Integrated Impact Assessment (IIA) of Haringey Proposed Submission Local Plan (Regulation 19)

October 2026



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0. Non-Technical Summary

0.1 What is this report about?

This report presents the findings of the Integrated Impact Assessment (IIA) undertaken to support the preparation of Haringey's Proposed Submission Local Plan (Regulation 19).

The Local Plan will guide development and investment across the borough over the period 2028 to 2043 and establish the planning framework for delivering new homes, employment opportunities, infrastructure, environmental improvements and neighbourhood placemaking. The IIA has been prepared alongside the Local Plan to ensure that social, economic, environmental, health and equality considerations have been integrated into plan-making and decision-making throughout the preparation of the Plan.

The IIA assesses:

- The likely effects of the Proposed Submission Local Plan.
- The reasonable alternatives considered during plan preparation.
- The potential social, economic and environmental consequences of different growth approaches.
- The extent to which the Local Plan supports sustainable development.
- Opportunities to enhance positive effects and minimise adverse effects.

0.2 The New Local Plan

The Haringey New Local Plan has been prepared to provide an updated planning framework for the borough. Once adopted, it will replace Haringey’s existing 2017 Local Plan forming the key part of the borough’s statutory Development Plan and will be used to help determine planning applications.

The Local Plan responds to a range of opportunities and challenges facing the borough, including:

- Housing affordability pressures and increasing housing need.
- Population growth and changing demographics.
- Health inequalities and social deprivation.

- Climate change mitigation and adaptation.
- Environmental protection and enhancement.
- Economic growth and employment needs.
- The need for investment in infrastructure and services.

The Plan establishes:

- A borough-wide vision and placemaking framework.
- A preferred spatial strategy for accommodating growth.
- Borough-wide development management policies.
- Neighbourhood policies.
- Site allocations.
- Policies covering housing, economy, employment, town centres, infrastructure, transport, climate change, biodiversity and design.

0.3 What is the Integrated Impact Assessment?

The purpose of the IIA is to assess the likely effects of the Local Plan and ensure that sustainability considerations are embedded throughout plan preparation. The assessment has informed the development of the Local Plan from the earliest stages and has been undertaken as an iterative process alongside policy development.

The IIA combines various assessment requirements into a single integrated process:

- Sustainability Appraisal (SA)
- Strategic Environmental Assessment (SEA)
- Health Impact Assessment (HIA)
- Equality Impact Assessment (EqIA)

A Habitats Regulations Assessment (HRA) has also been undertaken alongside the Local Plan and is reported separately.
This integrated approach ensures that environmental, social, economic, health and equality impacts are considered together when assessing the Plan.

0.4 How has the Proposed Submission Local Plan been assessed?

Sustainability objectives / IIA objectives

The assessment uses a framework of sixteen Integrated Impact Assessment (IIA) objectives covering the key sustainability issues facing Haringey. The topics covered are:

1. Social Infrastructure
2. Health and Wellbeing
3. Education
4. Air, Light and Noise Pollution
5. Climate Change Mitigation
6. Climate Change Adaptation and Resilience
7. Water Resources and Pollution
8. Biodiversity and Open Space
9. Soils and Minerals
10. Social Inclusion and Equality
11. Historic Environment, Culture and Character
12. Transport and Connectivity
13. Waste
14. Housing
15. Economy and Employment
16. Town Centres

These objectives have been used to assess:

- Reasonable alternatives.
- The Local Plan vision and objectives.
- The preferred spatial strategy.
- Borough-wide policies.
- Neighbourhood policies.
- Site allocations.

Scoring system

The assessment uses a scoring system to identify the likely impact of the proposed policies when they are considered against each of the IIA objectives. The assessment considers short, medium and long-term effects and identifies cumulative, synergistic and secondary effects where appropriate.

Table 0.1: SIGNIFICANCE DEFINITIONS (SCORING SYSTEM)

Significance of effect	
++	Significant positive
+	Minor positive
O	Neutral
-	Minor negative
--	Significant negative
?	Unknown
N/A	Not applicable

0.5 Our Local Plan Vision and Objectives

The Local Plan seeks to deliver sustainable growth through a neighbourhood placemaking approach which recognises the distinct character, opportunities and challenges of different parts of the borough.

The overarching ambition is to support:

- Delivery of new homes, including affordable homes.
- Strong and inclusive economic growth.
- Healthy and inclusive communities.
- Reduced inequalities.
- High-quality design and placemaking.
- Climate action and environmental resilience.
- Improved biodiversity and green infrastructure.

- Enhanced town centres and local centres.
- Better walking, cycling and public transport connectivity.
- Protection and enhancement of heritage, culture and local character.

The assessment concludes that the vision, objectives and placemaking framework are strongly aligned with the sustainability priorities identified through the evidence base, consultation responses and policy review.

0.6 Key Findings and Recommendations

Assessment of reasonable alternatives
The IIA assessed four spatial strategy options and three housing growth options. The assessment concluded that:

- **Option S4 (Urban intensification focus with limited land release/co-location)** provides the most sustainable spatial strategy, balancing housing growth, employment needs, environmental protection and infrastructure capacity.
- **Option H2 (London Plan 2021 and Capacity-Led Growth)** performs most favourably when considered against the full range of sustainability objectives, balancing housing delivery with environmental, economic and infrastructure considerations.

Assessment of the Proposed Submission Local Plan
Overall, the assessment concludes that the Proposed Submission Local Plan is expected to generate predominantly positive effects.

Significant positive effects are anticipated in relation to:
- Housing delivery.
- Health and wellbeing.
- Social inclusion and equality.
- Economy and employment.
- Town centre vitality and viability.

Positive effects are also expected in relation to:
- Climate change mitigation and adaptation.

- Biodiversity and green infrastructure.
- Sustainable transport.
- Heritage and local character.
- Water resources.
- Waste and circular economy objectives.

Potential adverse effects are primarily associated with accommodating growth and include:

- Increased pressure on transport infrastructure.
- Demand for healthcare and education facilities.
- Pressure on biodiversity and open spaces.
- Increased demand for utilities and water resources.
- Localised impacts on environmental quality.

However, these effects are expected to be largely mitigated through:

- Borough-wide policies.
- Neighbourhood policies.
- Site-specific requirements.
- Infrastructure planning.
- Development management processes.

Health Impact Assessment

The HIA concludes that the Local Plan is likely to have a significant positive effect on health and wellbeing through:

- New housing delivery.
- Healthy placemaking.
- Improved active travel opportunities.
- Enhanced green infrastructure.
- Better access to services and community infrastructure.

Equality Impact Assessment
The EqIA concludes that the Local Plan is expected to have significant positive effects on equality outcomes and support:

- Affordable housing delivery.
- Accessible homes.
- Improved access to employment.
- Community infrastructure provision.
- Inclusive design and placemaking.

Recommendations
No specific additional recommendations are considered necessary at this stage. The assessment concludes that the Proposed Submission Local Plan provides an appropriate framework for delivering sustainable development whilst avoiding, managing and mitigating adverse effects.

0.7 Next Steps

The Proposed Submission Local Plan and accompanying Integrated Impact Assessment will be published for Regulation 19 consultation. This will provide an opportunity for residents, businesses, statutory consultees, neighbouring authorities and other stakeholders to comment on the soundness of the Plan and the findings of the assessment.

Following consultation:

1. Representations will be reviewed by the Council.
2. The Local Plan and supporting evidence will be submitted to the Secretary of State.
3. The Plan will be independently examined by a Planning Inspector.
4. Any modifications arising through examination will be assessed and consulted on where necessary.
5. Following adoption, implementation of the Plan will be monitored through the Authority Monitoring Report (AMR).

Monitoring will help identify any unforeseen environmental, social or economic effects and ensure that the Plan continues to support the delivery of sustainable development across Haringey.

1. Introduction

1.1 Background

The London Borough of Haringey is preparing a New Local Plan to guide the future development of the borough over the plan period to 2043. The Local Plan will establish the spatial vision, objectives, policies and site allocations required to support sustainable growth, address local challenges and deliver the Council's ambitions for Haringey's communities, economy and environment.

The Local Plan is being prepared in the context of significant change and opportunity across the borough. Haringey faces a range of social, economic and environmental challenges including housing affordability pressures, inequality, climate change, infrastructure demands and the need to support economic growth whilst protecting the borough's valued heritage, green spaces and environmental assets. The Local Plan provides the primary mechanism through which these challenges can be addressed through the planning system.

This Integrated Impact Assessment has been undertaken alongside the preparation of the Local Plan to ensure that sustainability, health, equality and environmental considerations are embedded within plan-making and decision-making. The IIA process has informed the development of the Local Plan from an early stage, helping to identify potential impacts, test alternatives and refine the emerging strategy.

1.2 The Proposed Submission Local Plan

The Local Plan is the Council's key planning document which it uses to assess planning applications and to manage where new development happens and how it happens.

Haringey's existing Local Plan was adopted in 2017 and a process to replace it with a New Local Plan started in 2020. It is a statutory requirement for Local Authorities to have an up-to-date Local Plan. An updated Local Plan will allow the Council to plan for the next 15 years of development in the borough and support the successful delivery of Haringey's Borough Vision, including regarding inclusive placemaking and responding to the climate emergency.

The Plan has been prepared having regard to national planning policy and guidance, the London Plan and a wide range of supporting evidence prepared by the Council and its partners. It seeks to deliver sustainable development by balancing the need for homes, jobs and infrastructure with protection and enhancement of the borough's environmental, cultural and community assets.

This report accompanies the Regulation 19 publication version of the Local Plan (referred to as the 'Proposed Submission Local Plan') and presents the findings of the Integrated Impact Assessment undertaken to date.

1.3 What is the Integrated Impact Assessment (IIA)?

The Integrated Impact Assessment (IIA) is a process undertaken alongside preparation of the Local Plan to ensure that social, economic, environmental, health and equality considerations are taken account of throughout plan-making. The purpose of the IIA is to identify, describe and evaluate the likely effects of the Local Plan and to help ensure that sustainability considerations are integrated into decision-making from an early stage.

The IIA is intended to support the preparation of a more sustainable, inclusive and resilient Local Plan by testing emerging proposals, identifying potential adverse effects, considering opportunities for enhancement and assessing reasonable alternatives. It also provides a transparent evidence base explaining how sustainability considerations have influenced the development of the Plan.

To avoid duplication and ensure a coordinated assessment process, the Council has prepared a single IIA incorporates the following statutory and non-statutory assessment requirements:

- Sustainability Appraisal (SA);
- Strategic Environmental Assessment (SEA);
- Health Impact Assessment (HIA); and
- Equality Impact Assessment (EqIA).

The Sustainability Appraisal incorporates the requirements of the Strategic Environmental Assessment Regulations and considers the likely environmental, social and economic effects of the Local Plan. The Health Impact Assessment examines the potential effects of the Plan on the health and wellbeing of residents and seeks to identify opportunities to improve health outcomes and reduce health inequalities. The Equality Impact Assessment helps ensure that the Plan has regard to the Council's responsibilities under the Equality Act 2010 and considers the potential impacts of planning policies on people with protected characteristics and those experiencing socioeconomic disadvantage.
A separate Habitats Regulations Assessment (HRA) has also been undertaken alongside preparation of the Local Plan. The HRA considers whether the Local Plan could have likely significant effects on European designated habitat sites. The HRA is reported separately.

The integrated approach enables environmental, social, economic, health and equality considerations to be considered together through a single assessment framework. This provides a more comprehensive understanding of the likely consequences of policy choices and helps ensure that the Local Plan contributes towards the achievement of sustainable development.

1.4 Purpose of this Report

The purpose of this report is to:

- Document the Integrated Impact Assessment process undertaken to support preparation of the Proposed Submission Local Plan.
- Present baseline information and key sustainability issues affecting Haringey.
- Explain how reasonable alternatives have been identified and assessed.
- Evaluate the likely significant effects of the Proposed Submission Local Plan.
- Identify mitigation measures and opportunities for enhancement.
- Demonstrate how sustainability, health and equality considerations have informed plan preparation.
- Support consultation and provide evidence for the independent examination of the Local Plan.

This report has been prepared to accompany the Regulation 19 publication version of the Local Plan and forms part of the evidence base supporting the Plan.

1.5 Structure of this Report

The report is structured as follows:

- Chapter 0: Non-Technical Summary.
- Chapter 1: Introduction.
- Chapter 2: Review of relevant plans, policies and programmes.
- Chapter 3: Baseline analysis and key sustainability issues.

- Chapter 4: IIA framework and methodology.
- Chapter 5: Assessment of reasonable alternatives and explanation of the preferred approach.
- Chapter 6: Assessment of the Proposed Submission Local Plan.
- Chapter 7: Summary of key findings, cumulative effects and the outcomes of the HIA, EqIA and HRA.
- Chapter 8: Conclusions, recommendations, monitoring and next steps.
- Appendices: Detailed evidence, indicators and assessment matrices.

1.6 How to Comment on this IIA Report

The Council is consulting on both the Proposed Submission Local Plan and the accompanying Integrated Impact Assessment. Representations are invited from people who live and work in the borough, including residents, businesses, statutory consultees, infrastructure providers, community organisations and any other local groups.

Comments are welcomed on:

- The findings of the Integrated Impact Assessment.
- The assessment of reasonable alternatives.
- The evidence and assumptions relied upon.
- The identification of likely significant effects.
- Proposed mitigation measures and recommendations.
- Any information that may help improve the assessment.

Details of the consultation period, consultation documents and methods for submitting comments are provided alongside the Regulation 19 Local Plan consultation materials on the Council's website. All representations received will be considered by the Council before submission of the Local Plan for independent examination.

2. Review of Plans and Programmes

2.1 Introduction

The review of plans, programmes and strategies identifies the policy context within which the Local Plan is being prepared. The review helps to identify relevant sustainability objectives, environmental protection requirements and strategic priorities that should be taken account of through preparation of the Local Plan and the Integrated Impact Assessment. The findings of the review have informed the development of the IIA framework and objectives.

2.2 Approach

The review of plans, programmes and strategies was undertaken to establish the policy and legislative context within which the Local Plan is being prepared and to identify the key sustainability objectives, environmental protection requirements and strategic priorities relevant to the Integrated Impact Assessment.

The review considered relevant international, national, regional and local plans, programmes and policies covering a broad range of environmental, social and economic topics. These included planning policy, climate resilience, housing, transport, health, equality, economic development, heritage, infrastructure and environmental protection.

For each document reviewed, consideration was given to:

- The key objectives and priorities of the plan, programme or strategy.
- Relevant environmental, social and economic issues.
- Implications for the preparation of the Local Plan.
- Implications for the development of the IIA Framework and assessment objectives.

The review was undertaken at the scoping stage of the IIA process in 2020 and has subsequently been updated to reflect changes to the policy context, including publication of updated local evidence and strategies. The review has helped ensure that the Local Plan has been prepared having regard to relevant policy requirements and sustainability objectives at all levels of governance.

The review also assisted in identifying the key sustainability challenges and opportunities facing the borough and informed the development of the sixteen IIA objectives used throughout the assessment process. Together with the baseline review, it provided the evidence base for establishing the scope of the Integrated Impact Assessment.

A detailed review of relevant plans, programmes and strategies is provided in Appendix D. This appendix identifies the objectives of each document reviewed and summarises the implications for both the Local Plan and the Integrated Impact Assessment.

2.3 Review of Plans and Programmes: Key Findings

Key themes emerging from the review of plans and programmes include:

Housing and communities

The review highlights the need to:

- increase housing delivery;
- boost affordable housing provision;
- meet the needs of different groups;
- support healthy, inclusive communities.

Climate change and environment

The review highlights the need to:

- reduce greenhouse gas emissions;
- support net zero ambitions;
- improve climate resilience;
- protect biodiversity and green infrastructure and support nature recovery;
- improve air quality.

Economy and employment

The review highlights the need to:

- protect industrial capacity;
- support employment growth;
- strengthen town centres;
- support inclusive economic growth.

Historic environment and placemaking

The review highlights the need to:

- protect heritage assets;
- respond positively to local character;
- deliver high-quality design;
- create attractive and accessible places.

Overall, the review of plans, programmes and strategies highlights a strong and consistent emphasis on delivering sustainable growth, addressing climate change, reducing inequalities, improving health and wellbeing, supporting economic resilience, protecting and enhancing the natural and historic environment, and promoting high-quality placemaking. These themes reflect the key challenges and opportunities identified through the baseline evidence and have informed the development of the IIA Framework. These themes are reflected in the baseline analysis presented in Chapter 3 and informed the development of the IIA objectives presented in Chapter 4.

3. Baseline Analysis and Interrelationships Between Key Sustainability Issues

3.1 Baseline Data Summary

The baseline evidence provides an overview of the social, economic and environmental characteristics of Haringey and identifies the key sustainability issues that the Local Plan must address.

The evidence identifies several cross-cutting sustainability challenges facing the borough. These include population growth and increasing demand for housing and infrastructure; significant social, economic and health inequalities, particularly between eastern and western parts of the borough; housing affordability and overcrowding; climate change mitigation and adaptation; improving air quality and public health; protecting and enhancing biodiversity, heritage and open spaces; and supporting inclusive economic growth.

The evidence also highlights a strong spatial dimension to many sustainability issues, with eastern Haringey experiencing higher levels of deprivation, poorer health outcomes, lower open space provision, higher unemployment levels and greater environmental pressures than many western parts of the borough.

Existing physical infrastructure and community assets, including transport networks, utilities, schools, healthcare facilities, open spaces and waste infrastructure, will also experience increasing pressure as the population grows.

The baseline also identifies various positive trends, including improving air quality, reductions in carbon emissions, investment in active travel infrastructure, improvements in educational attainment and significant opportunities for placemaking and growth in locations such as Wood Green and Tottenham.

However, without a new Local Plan, many of the challenges faced are likely to intensify, and opportunities to deliver sustainable growth, reduce inequalities and improve environmental quality may be missed.

The table below presents a summary of key baseline conditions and trends and the likely future baseline without the Local Plan. A detailed baseline including statistics can be found in Appendix C.

Table 3.1: Baseline Summary and Likely Evolution Without the Local Plan

Sustainability Issue	Baseline Summary	Likely Situation Without the Local Plan
Social Infrastructure and Demographics	Haringey has a growing and highly diverse population, projected to increase to around 280,000 residents by 2031. The borough experiences significant inequalities, with	Without an updated planning framework, population growth is likely to place increasing pressure on housing, services and infrastructure. Existing social and spatial inequalities may widen, particularly in the east

	Northumberland Park remaining one of the most deprived neighbourhoods in London and pronounced east-west disparities in deprivation, health outcomes, educational attainment and economic opportunity. Population growth and an ageing population are expected to increase demand for housing, health facilities, community services and infrastructure. A key characteristic of the borough is the east-west divide in deprivation, health outcomes and access to opportunities and services. Although crime has fallen overall, it remains concentrated in more deprived neighbourhoods, alongside continuing concerns regarding youth violence and hate crime.	of the borough. Opportunities to promote inclusive communities, improve access to services, and support safer and healthier neighbourhoods may be missed.
Health and Wellbeing	Health outcomes have improved overall but significant inequalities remain between different parts of the borough and between population groups. Significant life expectancy gaps remain between the east and west of the borough.	Without the Local Plan, health inequalities may persist or worsen due to continued disparities in housing quality, environmental conditions, access to green space and healthcare infrastructure. Population growth may increase pressure on existing health facilities and recreational spaces.

	Childhood obesity levels remain among the most significant public health challenges, particularly among Year 6 pupils and within Black communities. Healthcare capacity pressures are forecast in some locations, particularly in primary care provision. Access to parks and open spaces contributes positively to wellbeing, although deficiencies remain in some areas.	
Education and Skills	Educational attainment has improved but remains below London averages in some areas. Significant disparities exist in educational outcomes by geography and ethnicity. Demand for primary school places has fallen significantly and linked to this demand for secondary school places is expected to decease, while post-16 education and training opportunities remain more limited within the borough. Participation in adult learning has declined, particularly amongst older and disadvantaged residents.	Without targeted planning and infrastructure delivery, educational inequalities may persist, potentially limiting opportunities for social mobility, skills development and economic participation. and ability to keep the full range of school sites open. Falling demand in primary and secondary schools may place additional pressure on funding of existing provision.

Air Quality, Noise and Light Pollution	Haringey remains designated as an Air Quality Management Area due to nitrogen dioxide exceedances, although air quality has improved in recent years. Major transport corridors remain associated with poorer air quality outcomes. Noise pollution is primarily associated with road traffic and can adversely affect health and wellbeing.	Without Local Plan policies supporting sustainable transport, low-emission development and improved environmental quality, poor air quality and noise pollution are likely to remain concentrated around major transport corridors and in more deprived areas. Vulnerable groups may continue to experience disproportionate impacts.
Climate Change Mitigation	Carbon emissions have fallen significantly since 2005, although residential energy use and transport remain the largest contributors. Haringey has committed to ambitious carbon reduction targets. Existing communal heating infrastructure in Haringey comprises estate-scale communal heating systems such as the Broadwater Farm heat network. The Council has previously explored proposals for larger strategic heat networks serving Tottenham Hale, Broadwater Farm, North Tottenham and Wood Green, however there are no immediate plans for a borough-wide heat network expansion. Opportunities for large-scale renewable energy generation remain relatively limited. Despite reductions in carbon emissions, fuel poverty remains a significant issue affecting	Without Local Plan measures supporting energy efficiency, renewable energy generation and low-carbon development, progress towards local and regional carbon reduction targets may slow. Fuel poverty and energy insecurity could continue to affect vulnerable households.

	almost 20,000 households. Improving energy efficiency standards in Haringey's building stock remains one of the largest opportunities to reduce carbon emissions in the borough.	
Climate Change Adaptation	Surface water flooding represents the principal source of flood risk within the borough. Flood risk is concentrated within the Lee Valley corridor and parts of eastern Haringey, while nine Critical Drainage Areas have been identified across the borough. Climate projections indicate increasing risks from flooding, overheating and extreme weather events. Urban heat island effects are expected to become more pronounced.	Without adaptation measures, climate-related risks are likely to increase. Surface water flooding and overheating could affect a growing number of residents, businesses and assets, with particularly significant impacts on older people, vulnerable groups and areas with limited green infrastructure.
Water Resources and Water Quality	Haringey lies within a water-stressed region and is served by a network of main rivers and culverted watercourses including the River Lee, Pymmes Brook and Moselle Brook. Water quality remains poor in several water bodies and there are opportunities for river restoration and deculverting.	Continued population growth is likely to increase pressure on water resources and wastewater infrastructure. Without Local Plan measures promoting water efficiency, SuDS and improved water management, water quality and resource pressures may increase. Opportunities to improve ecological conditions and resilience may be limited.
Biodiversity and Open Spaces	The borough contains an extensive biodiversity network comprising 71 Sites of Importance for Nature Conservation, 5 Local	Without policies protecting and enhancing biodiversity and green infrastructure, development and population growth may increase pressure on habitats and open

	Nature Reserves and strategically important ecological corridors including the Lee Valley, New River and Parkland Walk. Access to open space and nature remains uneven, with deficiencies concentrated in parts of eastern Haringey.	spaces. Opportunities for nature recovery, biodiversity net gain, habitat creation and improved access to nature could be reduced.
Land and Soil	Haringey is a predominantly urban borough with limited undeveloped land. Historic industrial activity has left areas of potentially contaminated land, although major brownfield sites have been remediated and no sites are currently recorded on the Contaminated Land Register. Brownfield land remains the primary source of future development opportunities. The majority of the borough is urbanised and opportunities to safeguard natural soil resources are limited. New development can contribute to additional soil sealing and loss of permeable surfaces unless appropriately managed.	Without the Local Plan, opportunities to make efficient use of previously developed brownfield land while protecting soil functions and managing contamination risks may be reduced.
Landscape and Townscape	Haringey's character is defined by a combination of urban neighbourhoods, valued open spaces and the Lee Valley landscape. Strategic views, Green Belt, Metropolitan Open Land and the Lee Valley landscape contribute significantly to the borough's character and environmental quality.	Without an updated planning framework, development may not consistently achieve high standards of design, accessibility and climate resilience. Development pressures could adversely affect landscape character, strategic views and the quality of the public realm.

	Growth is expected to involve higher density development in accessible locations, placing increasing importance on high-quality and inclusive design.	
Heritage and Culture	The borough contains a rich historic environment, including conservation areas, listed buildings, archaeological assets and locally significant heritage assets. Several heritage assets remain on Historic England's Heritage at Risk Register. Tottenham's Creative Enterprise Zone, Haringey's forthcoming London Borough of Culture 2027 programme, and a cultural sector representing almost 20% of local businesses contribute significantly to local identity, placemaking and economic vitality.	Without Local Plan policies supporting conservation and enhancement, designated and non-designated heritage assets, including archaeological remains, may become increasingly vulnerable to neglect, inappropriate development and loss of significance. Opportunities to protect and strengthen cultural infrastructure and support the creative economy may also be reduced.
Transport and Connectivity	Haringey benefits from strong radial public transport connections but weaker orbital connectivity. Walking and cycling infrastructure is improving, although active travel mode share remains low compared to many inner London boroughs. Congestion, road danger and air quality issues remain concentrated on major road corridors.	Without continued investment in sustainable transport and the integration of growth with transport infrastructure, congestion, pollution and road safety issues may worsen. Opportunities to increase active travel and reduce transport-related emissions may be missed.

	Car ownership is declining and electric vehicle infrastructure is expanding.	
Waste Management	Waste generation remains significant and is expected to increase alongside population growth. Recycling rates remain below strategic targets and most residual waste is managed through energy recovery facilities. Construction and demolition recycling rates are relatively high.	Without Local Plan measures supporting circular economy principles, sustainable construction and waste reduction, increased population and development may lead to higher waste generation and greater pressure on waste management infrastructure.
Housing	Haringey experiences significant housing affordability pressures, with demand for affordable homes substantially exceeding supply. Overcrowding, homelessness and housing insecurity remain significant issues. Demand for family housing, accessible homes, supported housing and specialist accommodation is expected to increase. Housing delivery has historically been strong nut below identified need.	Without the Local Plan, housing need is unlikely to be met, particularly for genuinely affordable and social rented homes. Housing affordability pressures, overcrowding and homelessness are likely to persist or worsen. Opportunities to provide accessible and specialist housing for diverse needs may be reduced.
Economy and Employment	Haringey has a diverse economy supported by industrial areas, town centres and a growing creative sector. Despite recent	Without a proactive planning strategy, economic growth may be constrained and inequalities in employment outcomes may persist. Employment land could be subject to

	growth, the borough has one of the lowest job densities in London, alongside persistent in-work poverty, skills inequalities and significant demand for affordable workspace. Key challenges include low job density, in-work poverty, skills inequalities and demand for affordable workspace. Employment land in the east of the borough continues to play an important economic role.	increased pressure from competing land uses, potentially affecting opportunities for local businesses and jobs.
Town Centres and Retail	Haringey's centres continue to evolve from predominantly retail destinations towards mixed-use locations supporting retail, leisure, cultural, residential and community uses. Vacancy rates are generally below national averages, although centres continue to experience structural changes associated with changing consumer behaviour and growth in online shopping. Wood Green remains the borough's principal centre, while Tottenham Hale and North Tottenham present significant opportunities for placemaking and growth. Safety, accessibility and inclusivity remain important considerations.	Without a coordinated planning approach, town centres may struggle to adapt effectively to changing retail and economic trends. Opportunities to support local businesses, maintain vitality and improve inclusivity may be reduced, potentially leading to declining attractiveness and resilience.

3.2 Interrelationships Between Key Sustainability Issues

Many of Haringey's sustainability issues are interconnected and cannot be considered in isolation.

Population growth is likely to increase demand for housing, employment land, transport infrastructure, healthcare, education facilities and open space. Similarly, economic growth can support investment in infrastructure and community facilities, whilst also increasing demand for housing, land and transport capacity.

Housing delivery and placemaking can contribute positively to economic growth, health outcomes and social inclusion, but may also place pressure on biodiversity, water resources, heritage assets and landscape character.

Climate change is closely linked to air quality, energy use, flood risk, health and wellbeing, green infrastructure and biodiversity. Similarly, access to open space and nature contributes to both physical and mental health, climate resilience and ecological connectivity.

Existing inequalities, particularly between eastern and western parts of the borough, influence many sustainability issues, including health outcomes, access to services, environmental quality, housing conditions, transport accessibility and economic opportunity.
The Local Plan therefore has an important role in managing these interrelated issues in an integrated manner and supporting sustainable development across the borough.

Overall, the baseline demonstrates that many sustainability issues are mutually reinforcing. For example, improving housing quality can contribute positively to health outcomes, climate change mitigation and fuel poverty reduction, whilst investment in green infrastructure can support biodiversity, climate resilience, air quality and health and wellbeing. The integrated nature of these issues underlines the importance of assessing Local Plan policies and site allocations collectively and cumulatively, rather than in isolation.

PART 1: What has plan-making/ IIA involved up to this point?

4. IIA Framework and Methodology

4.1 How was the IIA Scoped and Developed?

The purpose of the scoping stage is to establish the framework through which the likely significant social, economic and environmental effects of the Local Plan can be identified, described and evaluated. Scoping helps ensure that the assessment focuses on the issues that are most relevant to Haringey and provides the evidence base for the IIA. The process enables the Council to identify key sustainability challenges and opportunities, develop an appropriate assessment framework and ensure that sustainability considerations are integrated into plan preparation from an early stage.

The IIA has been undertaken as an iterative process alongside the preparation of the Local Plan. An IIA Scoping Report was prepared at the outset of the plan preparation and consulted upon alongside the Council's First Steps engagement on the emerging Local Plan between November 2020 and February 2021. The Scoping Report established the context for the assessment, established baseline conditions and sustainability issues, and proposed a framework of objectives and assessment questions against which the Local Plan could be assessed.

The scoping process involved four principal stages:

4.1.1 Review of Plans, Programmes and Strategies

A review was undertaken of relevant international, national, regional and local plans, programmes and strategies to identify environmental protection objectives, sustainability priorities and policy requirements relevant to the preparation of the Local Plan. The review considered planning, environmental, housing, transport, economic development, health, equality and climate change policy documents and helped identify the wider policy context within which the Local Plan is being prepared. The findings informed both the development of the Local Plan and the IIA Framework.

4.1.2 Baseline Evidence Review

A review of baseline information was undertaken to establish the social, economic and environmental characteristics of Haringey and identify key trends likely to influence the borough over the plan period. This included consideration of population and demographics, health and wellbeing, education, housing, employment, transport, climate change, biodiversity, heritage, infrastructure and environmental quality. The review also considered how these conditions may evolve in the absence of a new Local Plan.

4.1.3 Identification of Sustainability Issues and Opportunities

The findings of the policy review and baseline analysis were used to identify the principal sustainability challenges and opportunities that the Local Plan should seek to address. These included:

- Accommodating growth whilst maintaining and enhancing quality of life.
- Meeting identified housing needs, including affordable housing needs.
- Addressing health inequalities and improving wellbeing.
- Supporting inclusive economic growth and employment opportunities.
- Responding to the climate emergency through mitigation and adaptation measures.
- Protecting and enhancing biodiversity, open spaces and green infrastructure.
- Ensuring infrastructure provision keeps pace with growth.
- Protecting and enhancing heritage assets, local character and cultural infrastructure.
- Promoting sustainable and active travel.
- Supporting vibrant and resilient town centres.
- Reducing inequalities and promoting social inclusion.

These issues formed the basis for the subsequent development of the IIA Framework.

4.1.4 Development of the IIA Framework

The IIA Framework was developed by translating the identified sustainability issues into a series of objectives and supporting assessment questions. The framework provides the structure through which reasonable alternatives, policies and site allocations have been assessed

throughout preparation of the Local Plan. It ensures that social, economic and environmental considerations are assessed in a consistent and transparent manner.

The framework has been reviewed and refined during preparation of the Local Plan to reflect consultation responses, changes to the policy context, updated evidence and emerging priorities. Particular attention has been given to ensuring that the framework appropriately addresses health outcomes, equality impacts, the climate emergency, biodiversity, social inclusion, heritage, economic resilience and the wider objectives of sustainable development.

The Regulation 19 IIA Framework comprises sixteen objectives covering the principal environmental, social and economic issues relevant to Haringey. The framework integrates the requirements of SA, SEA, HIA and EqIA within a single assessment process.

4.1.5 Consultation and Evolution of the IIA

The IIA Scoping Report was published for consultation and circulated to the statutory environmental bodies and other key stakeholders, alongside the First Steps Consultation in 2020/2021. Since publication of the Scoping Report, the IIA framework has been reviewed and refined at key stages of plan preparation. Changes have been informed by consultation responses, updates to national, regional and local planning policy, new evidence, ongoing site assessment work and engagement with specialist officers, whilst maintaining continuity with the key sustainability issues identified during the scoping stage.

Following completion of the scoping stage, a Draft Integrated Impact Assessment was prepared and published alongside the Regulation 18 Draft Local Plan consultation which took place between October and December 2025. The Draft IIA assessed the emerging vision, objectives, spatial strategy, policies, site allocations and reasonable alternatives and sought views from statutory consultees, stakeholders and local communities.

The findings of the Regulation 18 IIA, together with consultation responses, updated evidence, changes in national planning policy, publication of the emerging Draft London Plan, updated housing and employment evidence, and further site assessment work, have informed the ongoing refinement of both the Local Plan and the IIA process. This Regulation 19 IIA Report represents the latest stage of the assessment and has been shaped by consultation responses, internal review of the IIA framework, updated evidence and continued refinement of the Local Plan, as summarised below.

How has consultation feedback shaped the IIA?
Following consultation on the Scoping Report, Historic England highlighted the importance of appropriate monitoring indicators. In response, the monitoring framework was developed to include indicators relating to both the condition of heritage assets and the effects of development on the historic environment (see Appendix E). Indicators include Heritage at Risk assets, conservation area management, heritage asset enhancement, development affecting designated heritage assets and archaeological resource protection, enabling monitoring of both positive and negative effects arising from Local Plan implementation.

Consultation on the Draft Regulation 18 IIA generated relatively limited comments on the assessment methodology itself (see Appendix B). However, responses regarding the Draft Local Plan, together with updated evidence and site assessment work, informed subsequent revisions to both the Local Plan and the accompanying IIA. This ensured that the assessment remained aligned with the evolving plan and policy context.

In addition to formal consultation, a series of officer workshops were undertaken with colleagues from the Council's Public Health and Equalities teams during preparation of the Regulation 19 Local Plan and accompanying assessments. These workshops reviewed the proposed IIA framework and emerging assessment findings. Feedback from these workshops informed the refinement of assessment objectives (see Table 4.1), health priorities, equality considerations and the interpretation of assessment outcomes. The workshops helped ensure that health and equality issues were fully integrated into the assessment process and reflected current local evidence and priorities.

Evolution of the IIA
The original Scoping Report established a broad framework of sustainability topics and objectives. Through consultation, ongoing evidence gathering, policy updates, internal reviews and engagement with specialist officers, the framework was subsequently refined and rationalised. As a result, the IIA framework now places a stronger emphasis on integrated assessment, equality, health and placemaking outcomes, whilst consolidating overlapping environmental topics and maintaining coverage of all sustainability issues identified through the original scoping process.

Summary of the main themes of change since publication of the IIA Scoping Report in 2021:

1. **Consolidation and simplification**
   The original Scoping Report framework included a number of overlapping objectives and sub-objectives. Following internal review, several closely related themes were consolidated to reduce duplication and improve clarity. For example:

- Air Quality and Noise were combined within a single Air, Light and Noise Pollution objective;
- Townscape and Landscape was merged with wider heritage and character considerations;
- Several environmental objectives were rationalised through the development of broader, more integrated assessment questions.

At the same time, some themes were separated where greater distinction was considered beneficial. For example, social infrastructure and social inclusion were separated into discrete objectives to better distinguish between infrastructure provision and equality outcomes.

2. **Stronger equality integration**
   Equalities considerations were originally addressed through a supporting equalities column within the assessment framework. Following engagement with the Council's Equalities Team, equality impacts became more directly embedded within the framework itself, including the development of a dedicated Social Inclusion and Equality objective (IIA10) and greater consideration of impacts on protected characteristic groups throughout the assessment criteria.

3. **Broader environmental objectives**
   Several environmental objectives were widened to provide a more comprehensive assessment of environmental sustainability and reflect evolving policy priorities and updated evidence. For example, the Air Quality objective was expanded to consider air, light and noise pollution; the Climate Change Mitigation objective evolved from a primary focus on reducing carbon emissions to encompass wider issues such as energy efficiency, net zero transition and reducing fuel poverty; the Climate Change Adaptation objective was broadened into Climate Adaptation and Resilience to capture a wider range of climate risks and responses; and the Waste Management objective was expanded to reflect circular economy principles and more efficient use of resources. These changes resulted in a more holistic assessment of environmental effects whilst maintaining continuity with the key issues identified at the scoping stage.

4. **Greater emphasis on place-making**
   The later iterations of the framework place greater emphasis on the quality of places and the experience of communities. This is reflected most clearly in the evolution of the heritage objective into "Historic Environment, Culture and Character", the expansion of the transport objective to include wider connectivity outcomes, and the greater consideration of social cohesion, accessibility, inclusion and healthy place-making throughout the assessment criteria.

Table 4.1 summarises the evolution of the IIA objectives throughout plan preparation, highlighting the key changes made between the Scoping Report, the Regulation 18 consultation draft, and the current Regulation 19 Integrated Impact Assessment.

Table 4.1: Evolution of IIA Objectives

IIA Scoping Report Objectives (2020/2021)	Draft IIA Objectives (Reg 18)	Reg 19 IIA Objectives	Summary of Key Changes	Main driver of change
Demographics	Incorporated across framework	Incorporated across framework	Standalone demographic objective removed. Population needs are embedded across social infrastructure, housing, health and equalities objectives.	Internal review of the framework to avoid duplication
Social Integration and Inclusion	IIA1 Social Infrastructure	IIA1 Social Infrastructure and IIA10 Social Inclusion & Equality	Original objective split into two separate objectives: one focused on facilities and infrastructure provision, the other on deprivation, inclusion, equality and community cohesion.	Equalities workshop feedback and improved integration of EqIA requirements
Health	IIA2 Improving Health	IIA2 Improving Health	Retained but expanded to strengthen links with social determinants of health, health inequalities and access to healthcare.	Public Health and Equalities workshop feedback and improved integration of HIA and EqIA requirements
Education	IIA3 Education	IIA3 Education	Largely unchanged. Continued focus on education, training, skills and accessibility.	No significant change following scoping stage.

Air Quality	IIA4 Air, Light and Noise Pollution	IIA4 Air, Light and Noise Pollution	Expanded from air quality alone to include wider environmental quality impacts including noise and light pollution.	Internal review and desire for a more integrated environmental quality assessment
Climate Change Mitigation	IIA5 Climate Change Mitigation	IIA5 Climate Change Mitigation	Retained but expanded from a primarily carbon reduction focus to include energy efficiency, heat networks, fuel poverty and the transition to net zero.	Updated climate evidence and policy emphasis on energy efficiency and reducing fuel poverty
Climate Change Adaptation	IIA 6 Climate Change Adaptation	IIA 6 Climate Adaptation and Resilience	Expanded from flood risk and overheating to a broader resilience-based objective.	Updated climate evidence and policy emphasis on resilience
Water Resources and Water Quality	IIA 7 Water Resources and Pollution	IIA 7 Water Resources and Pollution	Broadened to encompass pollution impacts as well as water quantity and quality issues.	Internal review and desire for a more integrated environmental quality assessment, also informed by consultation responses from the EA and Haringey's SFRA evidence.
Biodiversity and Open Spaces	IIA 8 Biodiversity and Open Space	IIA 8 Biodiversity and Open Space	Open space objective broadened to include green infrastructure, ecological	Updated environmental evidence and policy emphasis on biodiversity net gain, ecological connectivity and

			connectivity and wider environmental functions.	multifunctional green infrastructure.
Land and Soils	IIA9 Soils and Minerals	IIA9 Soils and Minerals	Largely unchanged. Continued focus on efficient use of land and natural resources.	No significant change following scoping stage.
Townscape and Landscape	IIA10 Townscape and Landscape	Incorporated into IIA 11	Standalone townscape objective removed and integrated into placemaking and heritage assessment.	Internal review to reduce overlap with heritage, design and placemaking considerations.
Design	Cross-cutting consideration	Cross-cutting consideration	Design no longer assessed as a separate objective; instead embedded throughout policy assessments.	Internal review recognising that design considerations influence multiple sustainability objectives and are more effectively assessed as a cross-cutting theme.
Heritage and Culture	IIA 11 Historic Environment and Culture	IIA 11 Historic Environment, Culture and Character	Expanded to explicitly recognise townscape, local character and placemaking alongside heritage assets.	Stronger placemaking focus and refinement of assessment framework by integrating townscape, local character, heritage and culture under one objective. Monitoring indicators provided (Appendix E) in

				response to comments from Historic England.
Transport	IIA 12 Transport	IIA 12 Transport and Connectivity	Expanded from transport provision to wider accessibility and connectivity outcomes.	Internal review and growing recognition of the importance of accessibility, connectivity and active travel in delivering sustainable development outcomes.
Noise	Incorporated into IIA 4	Incorporated into IIA 4	No longer assessed separately. Combined with air and light pollution objective to reflect environmental quality impacts.	Internal review and consolidation of related environmental quality objectives.
Waste Management	IIA 13 Waste	IIA 13 Waste	Retained but broadened to reflect circular economy principles.	Updated policy emphasis on circular economy
Housing	IIA 14 Housing	IIA 14 Housing	Retained but broadened to reflect identified needs including accessible and affordable homes.	Updated housing evidence and improved integration of health and equalities considerations.
Economy and Employment	IIA 15 Economy and Employment	IIA 15 Economy and Employment	Retained, with increased emphasis on inclusive growth, affordable workspace, local employment opportunities and economic resilience.	Internal review and desire to align with the Council's inclusive growth objectives.

Town Centres	IIA 16 Town Centres	IIA 16 Town Centres	Largely unchanged. Continued focus on vitality, increasing footfall and improving access to shops, services, leisure and cultural facilities.	No significant change following scoping stage.

As shown in Table 4.1, the evolution of the IIA framework has been characterised by refinement rather than fundamental change. The key sustainability issues identified through the Scoping Report remain reflected within the current framework, but objectives have been rationalised, broadened or reorganised to improve clarity, reduce duplication and better integrate health, equality and placemaking considerations. Collectively, these changes have produced a more holistic and integrated assessment framework whilst maintaining continuity with the original scope of the assessment.

4.2 IIA Framework

The IIA Framework provides the basis for assessing the likely significant effects of the Local Plan. The framework comprises sixteen objectives and supporting assessment questions derived from the review of plans and programmes, baseline evidence and sustainability issues identified through the scoping process. The framework has been applied consistently throughout the assessment of reasonable alternatives, policies and site allocations.

The IIA Framework is shown in the table blow. Baseline data evidence has also been referred to when using the IIA Framework to assess the Local Plan and its alternatives. The IIA objectives and assessment questions have been developed to address the key messages from the Context Review and the sustainability issues. The IIA framework needs to ensure that the EqIA and HIA are adequately addressed, by including objectives and assessment questions relevant to each assessment.

Table 4.2: The IIA Framework

Topic	IIA Objective	Assessment Questions – Does the Policy?
Social Infrastructure	IIA1 Social Infrastructure: Provision of social infrastructure in appropriate, accessible locations including education and health services.	• Promote social interaction in a way that fosters a culture of equality, fairness and respect? • Ensure all residents have equitable access to local services and facilities, taking account of the needs of Haringey's demographic? • Ensure all residents have equitable access to education, community services and facilities irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, marriage and civil partnership? • Improve safety and address fear of crime to help remove barriers to activities leading to reduced social isolation, particularly in areas of higher deprivation?
Improving Health	IIA2 Improving Health: Contribute positively to the physical and mental health and wellbeing of residents, whilst addressing the social determinants of health including housing, environment, and economic.	• Promote improvements in physical and mental health, particularly in areas of health and social deprivation? • Reduce differentials in life expectancy and healthy life expectancy across the borough? • Improve access to health and social care services and facilities, particularly in areas of deficiency such as the centre and east of the borough? • Improve quality of, and access to, health facilities? • Support the provision of quality, affordable and healthy food?

Education	IIA3 Education: Improve quality of, and access to, education and training facilities	• Improve inclusivity and accessibility of education and training facilities, particularly in areas where the need is greatest?
Air, Light and Noise Pollution	IIA4 Air, Light and Noise Pollution: Reduce emissions and concentrations of harmful atmospheric pollutants and minimise air, light and noise pollution	• Reduce inequal access to clean air? • Deliver development that does not expose current and future residents to poor air quality? • Minimise noise and vibration exposure and disruption?
Climate Change Mitigation	IIA5: Climate Change Mitigation: To support reductions in greenhouse emissions to meet national, regional and local net zero carbon targets	• Contributes to the provision of smart and affordable energy systems? • Reduce impacts of fuel poverty, particularly for vulnerable groups? • Support renewable and low carbon energy generation • Minimise greenhouse gas emissions?
Climate Adaptation and Resilience	IIA6: Climate Adaptation and Resilience: Adapt to the effects of climate change including current and future flood risk, minimise the potential for overheating	• Ameliorate the impact of flooding and overheating, particularly for those most vulnerable to its effects? • Ensure new development is designed to withstand future climate change?
Water Resources and Pollution	IIA7: Water Resources and Pollution: To minimise pressure on water resources, water consumption and wastewater flows	• Improve access to our waterways and restore culverted sections of rivers? • Maintain and enhance water quality consistent with the aims of the Water Framework Directive and Thames River Basin Management Plan?

		• Ensure water resources are used efficiently and contribute to the achievement of residential and commercial water usage targets in new developments? • Ensure adequate provision for sewerage infrastructure is made for new developments in line with predicted needs?
Biodiversity and Open Space	IIA8: Biodiversity and Open Space: To safeguard and enhance biodiversity and geodiversity and improve connectivity between, and access to, green spaces and functional habitats	• Improve access to open space and areas of biodiversity interest? • Avoid adverse effects on European designated habitats sites? • Conserve, enhance and repair nationally and locally designated wildlife sites? • Conserve, enhance and repair natural and semi natural habitats? • Contribute to the delivery of new or safeguard existing BAP priority species and habitats? • Reduce deficiencies in open space and play space? • Achieve biodiversity net gain? • Secure an increase in open space and play space across the borough? • Protect open space and biodiversity?
Soils and Minerals	IIA9: Soils and Minerals: To promote the efficient and sustainable use of land and natural resources and protect natural resources including greenfield land, soil and mineral resources	• Enable remediation of land to ensure the safety and protection of the most vulnerable • Avoid development of greenfield land? • Promote the efficient use of minerals? • Protect soil quality and avoid soil pollution?

Social Inclusion and Equality	IIA10: Social Inclusion and Equality: Reduce inequalities and promote social inclusion, accessibility, community cohesion and equality of opportunity for all residents.	• Reduce inequalities and disparities experienced by different groups and communities across the borough? • Promote equality of opportunity irrespective of race, religion, sex, age, sexual orientation, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership? • Improve accessibility and inclusion for all residents, particularly vulnerable and under-represented groups? • Promote community cohesion, social integration and positive relationships between different communities? • Reduce social isolation, exclusion and barriers to participation in community life?
Historic Environment, Culture and Character	IIA11: Historic Environment, Culture & Character: To protect, conserve and enhance Haringey's heritage assets, archaeological remains, cultural assets, historic character, landscapes, townscape quality and local distinctiveness.	• Improve equality of access and engagement with heritage assets, cultural facilities, creative activity and cultural participation? • Conserve and/or enhance heritage assets, historic environment, and their settings? • Ensure that new development uses existing historic character and heritage significance to guide new development and respond to local character and context? • Contribute to the better management of heritage assets and contribute to conserving heritage at risk? • Encourage heritage-led regeneration? • Help build a sense of place, support cultural identity and promote social integration?

		• Maintain and strengthen local landscape and townscape character and distinctiveness? • Protect sensitive areas and protected views? • Safeguard important and notable landscape and townscape features?
Transport	IIA12: Transport and Connectivity: To deliver a well-connected borough by promoting sustainable and active travel, enhancing accessibility and connectivity for people of all ages and abilities, and supporting the delivery of resilient digital infrastructure.	• Improve equality of access by walking, wheeling, cycling and public transport? • Increase the proportion of journeys made by sustainable and active transport modes? • Improves the safety of the transport network, particularly for those disproportionately affected by road danger?
Waste	IIA13: Waste: To minimise waste and support moves towards a circular economy	• Require new developments to provide adequate space for waste separation? • Encourage the repurposing and refurbishing of buildings? • Ensure waste is dealt with in line with circular economy principles? • Safeguard existing waste management sites?
Housing	IIA14 Housing: To deliver an increased supply of new homes including affordable homes, that meet local needs of all, including those on low incomes, the elderly and other vulnerable groups	• Contribute to increased supply of genuinely affordable homes? • Deliver homes to meet the full range of needs of Haringey's current and future population, including specific group needs such as older people, gypsies and travellers and those in need of supported housing? • Ensure that new homes are of a high quality and a suitable size and support health and wellbeing?

		• Ensure that new homes are inclusive and accessible? • Ensure that new homes are served by appropriate infrastructure and located well in relation to key amenities such as public open space and other services and facilities? • Provide a range of different sized housing sites to maintain a stable supply and five-year land supply of deliverable sites?
Economy and Employment	IIA:15: Economy and Employment: To support a strong, diverse and resilient economy and ensure an adequate supply of employment land suitable for existing and new businesses	• Provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration? • Improve equality of access to jobs and training opportunities? • Enable disadvantaged people to obtain employment or upgrade their skills and workplace experience? • Support for social enterprises, small businesses and the voluntary and community sectors? • Enable the delivery of affordable business premises?
Town Centres	IIA16: Town Centres: To enhance the vitality and vibrancy of the borough's town and local centres	• Create inclusive, safe and accessible town centres for everyone in the community? • Create healthy environments by promoting active travel and avoiding the proliferation and clustering of uses which are a risk to public health? • Enhance the environment of the borough's town and local centres?

		• Support new retail and leisure development within existing centres?

4.3 Assessment Methodology

4.3.1 Assessment Approach

The IIA has been undertaken in accordance with relevant legislation, guidance and best practice associated with SA, SEA, HIA and EqIA. The assessment has been carried out iteratively alongside preparation of the Local Plan to help inform policy development and the selection of preferred approaches.

The assessment has considered:

- Reasonable alternatives, including alternative spatial strategy options and housing growth options.
- The emerging Local Plan vision, objectives and placemaking framework.
- Neighbourhood policies.
- Borough-wide policies.
- Site allocations.

Each element has been assessed against the sixteen IIA objectives set out in the IIA Framework. The assessment draws upon baseline evidence, technical studies, consultation responses and professional judgement to identify likely significant social, economic and environmental effects.

Assessment Assumptions

The assessment has been undertaken using the best available evidence at the time of preparation. However, the precise effects of planning policies cannot always be predicted with certainty and a degree of professional judgement is required.

The assessment therefore:

- Draws upon published evidence and baseline information.

- Assumes policies will be implemented as intended.
- Reflects the strategic nature of the Local Plan.
- Considers likely rather than certain effects.
- Identifies uncertainty where robust conclusions cannot be reached.

Where evidence is limited or future outcomes are dependent on factors outside the Council's control, this has been reflected in the assessment via uncertainty ratings.

4.3.2 Significance Criteria

The significance criteria set out in Table 4.3 have been used consistently throughout the assessment to identify the likely significance of effects.

Table 4.3: Significance Definitions

Significance of effect		Description of effect
++	Significant positive	Likely to result in a major beneficial effect due to its scale, duration, permanence, or the importance/sensitivity of affected receptors. Effects may be borough-wide or may relate to a particularly important environmental, social or economic asset or community.
+	Minor positive	Likely to result in a limited beneficial effect. Effects may be localised, temporary, indirect or reversible and are unlikely to materially alter baseline conditions.
O	Neutral	No discernible effect on the present or future baseline situation.
-	Minor negative	Likely to result in a limited adverse effect. Effects may be localised, temporary, indirect or reversible and are unlikely to materially alter baseline conditions.
--	Significant negative	Likely to result in a major adverse effect due to its scale, duration, permanence, or the importance/sensitivity of affected receptors. Effects may be borough-wide or may affect nationally, regionally or locally important assets, vulnerable communities or highly sensitive receptors.
?	Unknown	This significance criterion is applied where there is insufficient information to make a robust assessment, or where an option is likely to result in a mixture of positive and negative effects and the overall significance cannot be determined with confidence.

N/A	Not applicable	This is applied to objectives that are clearly not affected by the option or policy being assessed.

4.3.3 Mitigation and Enhancement

The assessment seeks not only to identify likely significant effects but also opportunities to avoid, reduce or mitigate adverse effects and enhance positive outcomes. Recommendations arising from the IIA have informed the evolution of the Local Plan throughout its preparation and, where appropriate, have resulted in amendments to policies, site allocations and the preferred strategy.

4.3.4 Monitoring

Monitoring plays an important role in the IIA process by enabling the Council to identify unforeseen adverse effects and assess whether the Plan is delivering its intended outcomes. Proposed monitoring indicators are set out in Appendix E and will be used alongside the Council's Authority Monitoring Report and other evidence sources to monitor significant effects arising from implementation of the Local Plan.

4.4 Cumulative, Synergistic and Secondary Effects

The SEA Regulations require consideration of cumulative, synergistic and secondary effects arising from implementation of the Plan. Whilst individual policies may result in relatively limited effects when considered separately, the combined impact of multiple policies and proposals may be more significant.

Cumulative effects

Cumulative effects arise where multiple policies, allocations or development proposals combine to influence the same environmental, social or economic receptor. Examples may include the cumulative effects of housing growth on infrastructure demand, transport networks, biodiversity or open spaces.

Synergistic effects

Synergistic effects occur where the combined effect of multiple policies is greater than the sum of their individual effects. For example, policies promoting active travel, healthy placemaking and improved access to green infrastructure may collectively generate greater health benefits than any one policy in isolation.

Secondary effects
Secondary effects are indirect effects that occur because of other changes generated by the Plan. These may include impacts on infrastructure demand, transport movements, environmental quality or resource consumption arising from new development.

Temporal effects
The assessments also consider whether effects are likely to occur in the short, medium or long term and whether they are likely to be temporary, permanent, reversible or irreversible.

A detailed assessment of cumulative, synergistic and secondary effects is presented in Chapter 7 of this report.

4.5 Integrating the Assessments across the IIA Objectives

The Council has adopted an integrated assessment approach to avoid duplication and ensure that environmental, social, equality and health impacts are considered together throughout the preparation of the Local Plan.

The Integrated Assessment incorporates:

- Sustainability Appraisal (SA);
- Strategic Environmental Assessment (SEA);
- Health Impact Assessment (HIA); and
- Equality Impact Assessment (EqIA).

In addition, a separate Habitat Regulations Assessment (HRA) has been undertaken alongside preparation of the Local Plan.

Whilst each assessment has its own legislative and methodological requirements, there is significant overlap between them. The sixteen IIA objectives have therefore been designed to capture the key themes relevant to each assessment process.

The framework enables environmental, social, economic, health and equality issues to be considered through a single integrated process. This provides a more comprehensive understanding of the consequences of policy choices and supports more effective decision-making.

Table 4.4 shows how each objective contributes towards the requirements of SA, SEA, HIA and EqIA.

Table 4.4: IIA Objectives

IIA Objective	Description	EQIA	HIA	SEA	SA
IIA1 Social Infrastructure	**Provision of social infrastructure in appropriate, accessible locations including education and health services.**	**Y**	**Y**	**Y**	**Y**
IIA2 Improving Health	**Contribute to the physical and mental health and wellbeing of residents, whilst addressing the social determinants of health.**	**Y**	**Y**	**Y**	**Y**
IIA3 Education	**Improve quality of, and access to, education and training facilities.**	**Y**	**Y**	**Y**	**Y**
IIA4 Air, Light and Noise Pollution	**Reduce emissions and concentrations of harmful atmospheric pollutants and minimise air, light and noise pollution, particularly in vulnerable communities and areas experiencing the greatest environmental burden.**	**Y**	**Y**	**Y**	**Y**
IIA5: Climate Change Mitigation	**Minimise greenhouse gas emissions by reducing energy demand, increasing energy efficiency, and supporting the provision of low-carbon and renewable energy infrastructure, enabling a just transition to a net zero carbon and resource-efficient borough.**		**Y**	**Y**	**Y**
IIA6: Climate Adaptation and Resilience	**Adapt to the effects of climate change including building resilience against current and future flood risk and minimising the risk of overheating to protect health and wellbeing.**	**Y**	**Y**	**Y**	**Y**
IIA7: Water Resources and Pollution	**Protect and enhance water quality, minimise pressure on water resources, reduce water consumption and manage wastewater sustainably.**		**Y**	**Y**	**Y**
IIA8: Biodiversity and Open Space	**Safeguard, enhance and restore biodiversity and geodiversity, support nature recovery and ecological connectivity, and improve inclusive access to green infrastructure and natural spaces.**	**Y**	**Y**	**Y**	**Y**
IIA9: Soils and Minerals	**Promote the efficient and sustainable use of land and natural resources, prioritise previously developed land where appropriate, and protect natural resources including greenfield land, soil and mineral resources.**			**Y**	**Y**
IIA10: Social Inclusion and Equality	**Reduce inequalities and promote social inclusion, accessibility, community cohesion and equality of opportunity for all residents.**	**Y**	**Y**	**Y**	**Y**

IIA11: Historic Environment, Culture and Character	**Protect, conserve and enhance Haringey's heritage assets, archaeological remains, cultural assets, historic character, landscapes, townscape quality and local distinctiveness.**	**Y**		**Y**	**Y**
IIA12: Transport and Connectivity	**To deliver a well-connected borough by promoting sustainable and active travel, enhancing accessibility and connectivity for people of all ages and abilities, and supporting the delivery of resilient digital infrastructure.**	**Y**	**Y**	**Y**	**Y**
IIA13: Waste	**Minimise waste and support moves towards a circular economy.**				**Y**
IIA14: Housing	**Deliver high-quality, affordable and accessible homes that meet identified needs, reduce inequalities and support healthy communities.**	**Y**	**Y**	**Y**	**Y**
IIA:15: Economy and Employment	**Support a strong, diverse, resilient and inclusive economy, providing an adequate supply of employment land suitable for existing and new businesses.**	**Y**		**Y**	**Y**
IIA16: Town Centres	**Enhance the vitality and vibrancy of the borough's town and local centres.**	**Y**		**Y**	**Y**

4.6 Health Impact Assessment Method

The HIA has been undertaken as an integral component of the IIA. The purpose of the HIA is to identify the likely effects of the Local Plan on health and wellbeing and ensure that opportunities to improve health outcomes and reduce health inequalities have been considered throughout plan preparation. The assessment responds to Planning Practice Guidance, which recognises the important role that planning can play in improving health and wellbeing and addressing the wider determinants of health.

The HIA has been informed by a range of evidence sources including the borough's baseline evidence, various Joint Strategic Needs Assessments, the Council's Health and Wellbeing Strategy, public health evidence, consultation responses and recognised guidance on health impact assessment in planning. The assessment considers both direct and indirect health effects, recognising that health outcomes are influenced by a broad range of social, economic and environmental factors.

The HIA framework is structured around seven health priorities:

- Healthy and Inclusive Communities;
- Access to Health, Care and Community Services;

- Healthy Homes;
- Healthy Environment and Climate Resilience;
- Access to Nature, Open Space and Physical Activity;
- Healthy Streets, Mobility and Accessibility; and
- Healthy Economy and Food Environment.

To support preparation of the HIA, officer workshops were undertaken with the Council's Public Health team to review the proposed health priorities, assessment questions, emerging findings and overall approach. These discussions informed the refinement of the HIA framework and helped ensure that the assessment reflected local health priorities, existing health inequalities and the objectives of the borough's Health and Wellbeing Strategy. Particular attention was given to issues such as health inequalities, healthy environments, active travel, access to services, climate resilience and wider determinants of health.

A cross-cutting consideration throughout the assessment has been the distribution of health outcomes across different population groups and neighbourhoods. Particular regard has been given to children and young people, older people, disabled people, ethnic minority communities, people with long-term health conditions, people experiencing socioeconomic disadvantage and other groups that may be more vulnerable to poor health outcomes or environmental inequalities.

The assessment indicates that the Local Plan is expected to generate predominantly positive health outcomes through the delivery of new homes, improved access to services and community infrastructure, enhanced opportunities for walking and cycling, protection and enhancement of green infrastructure, improved environmental quality and measures addressing climate change and health inequalities. Particular benefits are anticipated from policies promoting healthy placemaking, inclusive design, improved housing quality, access to open space, community infrastructure and sustainable travel.

Potential adverse effects may arise where growth places additional pressure on health services, environmental resources or existing infrastructure. However, these risks are expected to be mitigated through infrastructure planning, environmental protection measures, healthy placemaking principles and the wider Local Plan policy framework. The findings of the HIA have informed the development and refinement of Local Plan policies throughout the plan-making process. A detailed Health Impact Assessment is provided in Appendix XX.

4.7 Equalities Impact Assessment Method

An EqIA has been undertaken to support the Council's Public Sector Equality Duty under the Equality Act 2010 and to ensure that equality considerations have been embedded throughout preparation of the Local Plan. The EqIA examines the extent to which Local Plan policies may affect people with protected characteristics and considers opportunities to advance equality of opportunity, eliminate discrimination and foster good relations between different groups within the borough.

The assessment has been informed by a range of evidence sources, including Census 2021 data, housing evidence, health and wellbeing evidence, deprivation data, consultation responses and the borough's wider evidence base. The assessment also draws upon findings from the wider impact assessments, recognising the strong relationship between inequality, health outcomes, housing, access to services and economic opportunity.

The EqIA has considered the likely effects of the Local Plan on the following protected characteristics:

- Age;
- Disability;
- Gender reassignment;
- Marriage and civil partnership;
- Pregnancy and maternity;
- Race;
- Religion or belief;
- Sex; and
- Sexual orientation.

In addition, a decision was taken for the assessment to consider socioeconomic disadvantage as a local equality consideration, recognising that deprivation and inequality remain significant challenges within Haringey and often intersect with protected characteristics. Particular regard has therefore been given to groups more likely to experience housing need, poor health outcomes, barriers to accessing services or reduced access to economic opportunities.

Officer workshops were undertaken with the Council's Equalities team during preparation of the Regulation 19 Local Plan and supporting assessments. These workshops reviewed the proposed equality assessment framework, protected characteristic considerations, emerging findings and proposed mitigation measures. Feedback informed the approach to the assessment, ensuring that it reflected local equalities priorities, consultation feedback and the Council's obligations under the Public Sector Equality Duty.

The assessment identifies that the Local Plan is expected to have predominantly positive impacts for people with protected characteristics and residents experiencing socioeconomic disadvantage. Significant positive effects are anticipated through the delivery of affordable housing, accessible and adaptable homes, improved access to employment and training opportunities, enhanced community infrastructure, improved public transport and active travel networks, high-quality public realm and support for inclusive neighbourhoods. The groups expected to benefit most include older people, disabled people, children and young people, women, ethnic minority communities and residents on lower incomes.

Potential adverse effects may arise where growth and regeneration contribute to affordability pressures, displacement risks or changes to existing communities. These risks are recognised within the EqIA and are addressed through affordable housing policies, affordable workspace policies, inclusive design requirements, protection of community infrastructure and ongoing monitoring of plan outcomes.

Overall, the EqIA concludes that the Local Plan is expected to make a positive contribution towards reducing inequalities and advancing equality of opportunity across Haringey. The findings have informed preparation of the Local Plan and helped shape policy development throughout the plan-making process. A detailed EqIA is provided in Appendix H.

4.8 Habitats Regulation Assessment

A Habitats Regulations Assessment (HRA) has been undertaken in parallel with the Integrated Impact Assessment (IIA) and forms part of the evidence base supporting the Local Plan. The HRA considers whether the Local Plan, either alone or in combination with other plans and projects, is likely to result in significant effects on European sites designated under the Habitats Regulations.

The HRA has informed preparation of the Local Plan and has considered potential pathways for effects, including recreational pressure, air quality impacts and impacts on water resources. The findings of the HRA have been taken into account during plan development and should be read alongside this report.

4.9 Preparing the IIA

The IIA has been prepared alongside the Local Plan by the Council, drawing upon a wide range of technical evidence, specialist studies and consultation responses.

The preparation of the IIA has involved ongoing collaboration between planning policy officers, specialist consultants and internal and external stakeholders. The assessment has been undertaken iteratively, enabling its findings to inform the development of alternatives, policies and site allocations throughout the plan-making process.

Quality assurance has been undertaken throughout preparation of the IIA to ensure consistency, transparency and compliance with relevant legislation and guidance. A quality assurance checklist is included in Appendix A.

The relationship between the IIA and Local Plan preparation has been continuous and iterative. Assessment findings have informed the development of preferred approaches, while changes to the emerging Local Plan have been reflected through subsequent stages of the assessment process. This iterative approach is consistent with national guidance and represents an important component of sound plan preparation.

5. Reasonable Alternatives

5.0 Approach to alternatives assessment

A key element of the IIA process is the appraisal of ‘reasonable alternatives’ for the Local Plan. In line with regulatory requirements, there is a need to explain how work has been undertaken to develop and then appraise reasonable alternatives, and how the Council considers the appraisal findings when developing the preferred approach for the plan.

The regulations are not prescriptive as to what constitutes a reasonable alternative, stating only that the SEA Environmental Report (an integral element of this IIA) should present an appraisal of the “plan and reasonable alternatives taking into account the objectives and geographical scope of the plan”.

This part of the IIA report therefore describes how the IIA process to date has informed the Regulation 19 version of the Local Plan, including potential locations for proposed development. Focus is paid to how the emerging Local Plan has been developed in terms of a consideration of the sites available for potential allocation and the distribution and approach to future development.

This part of the report is structured as follows:

- 5.1 establishes the options for assessment based on the latest evidence underpinning the plan.
- 5.2 presents a summary of the appraisal of the various options established in 5.1.
- 5.3 provides the Council's reasoning behind the preferred approach for the Local Plan.

5.1. Establishing Reasonable Alternatives

5.1.1 Background

The reasonable alternatives assessed through the IIA have evolved throughout the preparation of the Local Plan in response to consultation feedback, changes in national, regional and local planning policy, and the preparation and publication of new evidence.

Earlier stages of plan preparation considered a broader range of alternative approaches to accommodating growth, including different assumptions regarding housing delivery, employment land, urban intensification, land release and the spatial distribution of development.

The Regulation 19 alternatives differ from those assessed at Regulation 18 due to the publication of the Draft London Plan, updated employment land evidence, updated housing capacity evidence, site assessment work, the Housing and Economic Land Availability Assessment (HELAA), and consultation feedback received on both the Regulation 18 Local Plan and Integrated Impact Assessment. The options assessed through this IIA have therefore been refined to reflect the latest evidence base, respond to issues raised through consultation, and better represent the realistic strategic choices available to the Council.

Table 5.1: Evolution of Haringey's Integrated Impact Assessment

Stage of Plan preparation and IIA	Evolution of key evidence and policy context	Key outputs
First Steps Consultation and IIA Scoping	Baseline evidence collected, sustainability issues identified, IIA framework developed and consulted upon alongside early plan-making engagement.	IIA framework and assessment objectives established.
Regulation 18 Consultation and Draft IIA Report	Initial evidence base, consultation feedback and emerging strategic priorities used to develop and assess a broad range of reasonable alternatives and to update the IIA assessment objectives.	Initial spatial strategy and housing alternatives identified and assessed.
Post-Regulation 18 Consultation	Updated evidence base, HELAA, employment land evidence, housing capacity work, Draft London Plan and consultation feedback used to review and refine alternatives. IIA assessment objectives updated to take a more holistic approach to social inclusion following internal review.	Refined reasonable alternatives developed for further assessment.
Preparation of the IIA for Regulation 19 Consultation	Final reasonable alternatives assessed against the updated evidence base and IIA framework.	Assessment of spatial strategy options (S1-S5) and housing growth options (H1-H4), informing selection of the preferred approach.

The spatial strategy alternatives explore where and how growth may be accommodated, establishing the principal spatial responses available to the Council, including different approaches to urban intensification, employment land release, Metropolitan Open Land (MOL) and Grey Belt release, and the optimisation of existing urban land.

The housing growth alternatives build upon the spatial strategy alternatives to explore how much growth can be reasonably accommodated by testing different levels of housing provision and considering the extent to which the alternative spatial approaches would need to be relied upon in order to deliver growth. The options therefore explore different approaches to balancing identified housing need, development capacity and the wider social, environmental and economic objectives of the Local Plan, recognising that higher levels of housing provision may require different spatial responses across the borough.

The alternatives assessed at this stage are considered to represent the most realistic and reasonable options available to the Council. Other alternatives considered through earlier stages of plan preparation were discounted where they were no longer consistent with the evidence base or policy framework, would not be capable of meeting the objectives of the Local Plan, or were not considered deliverable.

The purpose of the assessment is not to identify a single option that performs best against every objective. Rather, it seeks to understand the likely significant environmental, social and economic effects of each reasonable alternative, identify potential trade-offs between objectives, and inform the selection of the preferred strategy for the Local Plan. This reflects Planning Practice Guidance, which states that sustainability appraisal should focus on effects that are likely to be significant. Reasonable alternatives for detailed thematic policies are considered separately in Appendix F.2.

5.1.2 Spatial Strategy Options – Where should growth go and what form should it take?

Spatial strategy options have been explored to identify alternative approaches for accommodating housing and employment growth and delivering the vision and objectives of the Local Plan.

The primary focus of spatial strategy options comprises:

- geographical distribution of growth;
- placemaking priorities;
- role of centres and neighbourhoods;
- approach to employment land protection, release and intensification;
- approach to Metropolitan Open Land (MOL) and Green Belt release;

- extent and form of urban intensification.

The options consider different approaches to the distribution of development, the role of placemaking, the relationship between housing and employment growth, and the extent to which growth should be accommodated through the release of employment land, Metropolitan Open Land and Green Belt land, or through intensification within the existing urban area. The options also consider the extent to which new development can be used to address inequalities, improve access to services, support climate resilience and enhance local communities.

Four spatial strategy options have been identified for appraisal:

Option S1: Urban Intensification - The Council would seek to accommodate growth within the existing urban area without the release of designated employment land, Metropolitan Open Land and Green Land.

Under this option:

- Housing growth would be accommodated primarily through higher-density redevelopment and infill opportunities within the existing urban area.
- All designated industrial land would be retained and safeguarded for employment uses.
- There would be no release of Metropolitan Open Land or Green Belt land.
- The extent of urban intensification required would be significant and may require high-density development exceeding the building height assumptions tested through the Tall Buildings Study.
- Employment growth would be supported through intensification, modernisation and optimisation of existing employment sites.

This option would maximise protection of employment land and open land. However, accommodating growth would require substantially greater levels of urban intensification and taller buildings than under alternative options, potentially exceeding the assumptions tested through the Tall Buildings Study.

Option S2: Land Release Led - The Council would seek to accommodate a high level of growth through the release of employment land, Metropolitan Open Land and Green Belt land, reducing the need for more extensive urban intensification and taller forms of development.

Under this option:

- Housing growth would be accommodated through residential-led mixed-use redevelopment on released sites, including the re-provision of employment floorspace where appropriate, and through redevelopment and infill opportunities within the existing urban area.
- There would be large-scale release of designated industrial land.
- There would also be release of Metropolitan Open Land (MOL) where supported by evidence, including consideration of golf course sites, and to a lesser extent release of Green Belt.
- A high level of growth accommodated through land release would reduce need for, and reliance on, urban intensification elsewhere in the borough.
- There would be lower levels of urban intensification and reduced reliance on taller buildings and higher densities than under more intensification-led approaches.
- There would be opportunities to deliver comprehensive redevelopment and placemaking on larger land release sites.

This option seeks to accommodate a high level of growth through the release of employment land, Metropolitan Open Land and Green Belt land, reducing the need for more extensive urban intensification elsewhere in the borough. Whilst it may reduce pressure for higher-density development and taller buildings in existing urban areas, it would require the loss of designated employment land and protected open land to support housing and employment growth.

Option S3: Maximum Growth - The Council would seek to maximise housing and economic growth via the highest level of urban intensification that is realistically achievable together with extensive release of designated employment land, Metropolitan Open Land or Green Belt.

Under this option:

- There would be significant urban intensification, potentially requiring building heights and densities beyond those envisaged through the Council’s Tall Buildings Study

- There would be large-scale release and redevelopment of designated industrial land across the borough to support housing and mixed-use growth.
- There would be extensive release of Metropolitan Open Land (MOL), including golf course sites, and to a lesser extent release of Green Belt land,
- Development would be directed towards maximising overall housing and employment growth across the borough.

This option explores the extent to which housing and economic growth could be maximised through the combined use of land release and urban intensification. It would require substantial redevelopment, extensive land release and the highest levels of intensification considered within the alternatives assessment. Whilst it would provide the greatest opportunity to increase housing and employment capacity, it would also be likely to generate the greatest pressure on infrastructure, environmental assets, townscape character and the historic environment.

Option S4: Urban intensification focus with limited land release/co-location - The Council would seek to accommodate growth through an approach focused on urban intensification with limited co-location and limited Metropolitan Open Land and Green Belt release.

Under this option:

- Growth would be accommodated through an urban intensification focus with limited co-location of housing and employment on employment land, and very selective release of Metropolitan Open Land and Green Belt.
- There would be urban intensification through residential-led mixed-use development, with the location and extent of intensification guided by a design-led approach.
- All designated industrial land, including Strategic Industrial Locations (SIL) and Locally Significant Industrial Sites (LSIS), would be retained and safeguarded for employment. Employment growth would be supported through the renewal and intensification of existing employment areas.
- There would be co-located industrial and residential uses on a limited amount of employment land, maintaining industrial capacity while supporting housing growth.
- There would be very selective release of Metropolitan Open Land and Green Belt land identified as Grey Belt to support housing growth and placemaking aspirations.

- Locations suitable for tall buildings would be in line with the Council's Tall Buildings Study to support higher-density development in appropriate locations.
- The need for high-density development exceeding the building height assumptions tested through the Tall Buildings Study would be avoided.
- Development would be distributed across a range of neighbourhood growth areas rather than concentrated in a lower number of locations.

This option seeks to accommodate growth through a focus on urban intensification while avoiding the need for unacceptable densities in the urban area. This option reflects the broad approach consulted on through the Regulation 18 Local Plan. It would support housing growth whilst maintaining strong protection of employment land and avoiding significant harm to Metropolitan Open Land and Green Belt.

5.1.3 Housing Growth Options - How much housing growth should Haringey plan for?

Housing growth options have been informed by a range of evidence prepared to support the emerging Local Plan. The primary focus of housing growth options comprises:

- the level of housing provision;
- the extent to which identified housing need is met;
- the land requirements associated with different levels of growth; and
- the implications for housing affordability.

The NPPF requires that Local Plans set out the minimum amount of housing development to be provided for a period of no less than 10 years from the point of adoption of the plan. Haringey's New Local Plan is proposed for adoption in 2028/9 and must therefore contain a housing requirement for a minimum period of 2028/9 to 2037/8.

The NPPF Standard Method provides an unconstrained assessment of housing need, identifying the minimum number of homes required based on national methodology. In contrast, the Mayor of London's Spatial Development Strategy for Greater London - the London Plan - sets housing targets that are capacity-led, reflecting the opportunities and constraints associated with accommodating growth within London, including land availability, environmental designations and infrastructure considerations.

The adopted London Plan 2021 sets housing targets for London boroughs until 2028/29. It states at para 4.1.11 that "If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites".

The Draft London Plan July 2026 proposed new ten-year targets for London Boroughs covering the period 2027/28 to 2036/37.
Taking account of the NPPF and the adopted and emerging London Plans, the Council has explored a range of potential housing growth options across the period of the Haringey New Local Plan. The housing growth options presented below have been developed having regard to identified housing need, housing requirements arising from national policy and the London Plan, and evidence relating to development capacity and land availability across the borough, including the Council's HELAA. The options test a range of potential housing growth scenarios and consider their implications for employment land, infrastructure provision, environmental objectives and the borough's wider placemaking priorities.

Four options have been identified for appraisal as follows:

Option H1: Housing Need-Led Growth - Haringey seeks to meet housing needs derived by the NPPF Standard Methodology over the period 2028/9 to 2037/8 (28,413 homes net).

This option would deliver the highest level of housing growth over the plan period. It seeks to maximise housing delivery in response to identified housing need and affordability pressures.

Under this option:

- Significant urban intensification would be required across the borough.
- There would need to large scale release of land designated for employment or open space
- Greater reliance required on tall buildings, including in locations where capacity for height growth may be constrained.
- Additional development opportunities would need to be identified beyond those currently identified through the Council's evidence base.
- Greater pressure would be placed on infrastructure, open space and competing land uses.
- Reduced ability to accommodate other land use priorities, including employment and town centre uses.
- Increased challenges in having sufficiency of social and community infrastructure needed to support growth.

At this level of housing growth, greater priority would need to be given to accommodating residential development. It is likely that identified environmental objectives, employment land and infrastructure needs would become increasingly difficult to accommodate alongside housing requirements, creating additional pressure on industrial land and other competing land uses.

Option H2: London Plan 2021 and Capacity-Led Growth - Haringey seeks to meet the adopted London Plan housing requirement up to 2028/9. Housing delivery from 2029/30 to 2037/8 would be informed by the borough's identified development capacity (18,300 homes net).

This option combines delivery of the adopted London Plan housing requirement to 2028/9 with a capacity-led approach to housing growth over the period 2029/30 to 2037/38. The capacity-led figure would be equivalent to rolling forward Haringey's London Plan 2021 annualised housing target to 2037/8 and delivering the backlog against the London Plan target for the years 2021/2 to 2025/6. This option seeks to optimise housing delivery within the constraints of the needs for housing, economic and other uses and taking account of the borough's identified development capacity, having regard to the availability, suitability and achievability of development sites.

Under this option:

- Housing delivery would reflect the borough's strategic housing requirement identified through the adopted London Plan 2021
- Significant urban intensification would continue to be required in accessible locations.
- Housing growth would be closely aligned with identified development opportunities and expected delivery.

- Greater flexibility would be available to balance housing delivery with employment land needs, infrastructure provision, environmental objectives and wider placemaking priorities.
- Reduced pressure to identify additional development capacity beyond that identified through the borough's evidence base.
- Continued optimisation of suitable sites through placemaking, redevelopment and urban intensification.
- Housing delivery would be lower than under housing need-led options where identified development capacity is more constrained than assessed housing need.

At this level of growth, housing delivery would be informed by identified development capacity and the expected delivery of allocated and identified sites. The option would provide greater flexibility to balance housing growth alongside employment land needs, infrastructure provision, environmental objectives and wider placemaking priorities.

Option H3: Draft London Plan 2026 – Haringey seeks to meet the housing requirement identified by the Draft London Plan over the period 2028/9 until 2037/8 (18,911 homes net).

This option would deliver housing growth in line with the strategic housing requirement identified through the emerging Draft London Plan. The requirement is informed by the Mayor of London's assessment of housing capacity and the strategic distribution of growth across London.

Under this option:

- Housing delivery would reflect the strategic housing requirement identified through the Draft London Plan.
- Urban intensification would continue to be required in accessible locations.
- There would be release of industrial land to provide additional housing capacity
- The level of growth exceeds that identified through Haringey's own assessment of deliverable development capacity.
- Greater housing delivery would be achieved than under lower-growth alternatives.
- Housing delivery would be lower than under housing need-led options where identified development capacity is more constrained than assessed housing need.

This option reflects the strategic spatial approach set out in the Draft London Plan 2026, placing emphasis on urban optimisation alongside industrial land release. Delivery would remain dependent on the development coming forward on industrial land via a development management-led process.

5.1.3 Site Options

Potential sites for allocation in the Local Plan were previously identified by the Council from a range of sources (including Strategic Housing Land Availability Assessment work undertaken by the GLA for the London Plan, various Call for Sites exercises, planning application and preapplication data, previous plan allocations, and a review of land in council ownership).

Evidence regarding housing land supply and development capacity has been informed by the London Strategic Housing Land Availability Assessment (SHLAA) and the Council's Housing and Economic Land Availability Assessment (HELAA). The HELAA is a technical assessment of potential development sites and broad locations across the borough. It draws on sites submitted through recent Call for Sites exercises, existing allocations, previous SHLAA evidence, the Brownfield Register and other known development opportunities. The HELAA assesses the suitability, availability, achievability and potential capacity of sites to provide an understanding of the borough's potential housing and employment land supply.

In accordance with national planning policy and guidance, the HELAA does not determine whether sites should be allocated for development. Rather, it provides evidence on sites that may have development potential. Decisions regarding site allocations are informed through the Local Plan process, taking account of the HELAA findings alongside other evidence including site selection work, infrastructure considerations and the IIA.

As part of the IIA process, all reasonable candidate sites were appraised against the IIA framework. Site appraisal formed one element of the wider site selection process and was considered alongside suitability, availability, achievability, infrastructure capacity, planning constraints and delivery considerations. This appraisal sought to evaluate the constraints and opportunities on each site based on the IIA objectives set out in the IIA framework. Based on these criteria, a 'significant effects' rating was then applied to each site for each criterion to provide an indication of the relative sustainability merits of the sites.

The detailed outcomes of this assessment are provided in Appendix F.4. This analysis has been used to inform the site selection process as well as subsequent IIA appraisals.

5.2 Assessing Reasonable Alternatives

For each of the options, the assessment examines likely significant effects on the baseline, drawing on the sustainability themes and objectives identified through scoping (see section 1.3) as a methodological framework. Green shading is used to indicate significant positive effects, whilst red shading is used to indicate significant negative effects, and significant effects are indicated in the text. Where appropriate neutral effects, or uncertainty will also be noted. Uncertainty is also highlighted with grey shading.

Where there is a need to rely on assumptions to reach a conclusion on a 'significant effect' this is made explicit in the appraisal text. Where it is not possible to predict likely significant effects based on reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a rank of preference. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Numbers are used to highlight the options that are preferred from an SA perspective with '**1**' being the highest ranking. '**=**' has been used to highlight where options perform equally or cannot be differentiated between.

5.2.1 Assessment of Spatial Strategy Options

Four options have been identified for appraisal:

- **Option S1: Urban Intensification** - The Council would seek to accommodate growth within the existing urban area without the release of designated employment land, Metropolitan Open Land and Green Land.
- **Option S2: Land Release Led -** The Council would seek to accommodate a high level of growth through the release of employment land, Metropolitan Open Land and Green Belt land, reducing the need for more extensive urban intensification and taller forms of development.
- **Option S3: Maximum Growth -** The Council would seek to maximise housing and economic growth via the highest level of urban intensification that is realistically achievable together with extensive land release through the Local Plan combining extensive land release of designated employment land, Metropolitan Open Land or Green Belt land.

- **Option S4: Urban intensification focus with limited land release/co-location** - The Council would seek to accommodate growth through an approach focused on urban intensification with limited co-location and limited Metropolitan Open Land and Green Belt release.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA1: Social Infrastructure	Effect	Positive	Uncertain	Uncertain	Positive
	Rank	2	3	4	1

The baseline review identifies that Haringey benefits from an extensive network of social infrastructure, including healthcare facilities, schools, community facilities, utilities and emergency services. However, provision is not always located in areas of greatest need and some facilities are subject to capacity pressures, require renewal or are no longer fit for purpose. Future growth will increase demand for services and facilities, making it important that development is coordinated with infrastructure planning and delivery.

The spatial strategy options propose different approaches to the location and form of growth. As a result, they differ in their ability to support investment in existing infrastructure, improve access to services and facilities, and ensure that infrastructure provision keeps pace with development.

Option S1 would accommodate growth exclusively through urban intensification within the existing urban area. While the concentration of all growth within existing urban areas could also place additional pressure on infrastructure and community facilities where capacity is already constrained, this may create opportunities to make more efficient use of existing social infrastructure and support investment in facilities located within established communities. Positive effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt. Whilst this approach could create opportunities to deliver new infrastructure alongside development, growth may be located further from existing services and facilities than under more neighbourhood-focused approaches. The option may also place greater reliance on the timely delivery of new infrastructure, associated with land release, rather than investment in and renewal of existing facilities. Overall, uncertain effects are identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. Whilst this could generate opportunities for investment in new and existing infrastructure, it would also place the greatest demand on schools, healthcare facilities,

community facilities and utilities. The scale of growth proposed may increase the risk that infrastructure provision, renewal and upgrading struggle to keep pace with development. Uncertain effects are therefore identified and the option performs least favourably overall.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth would be more distributed across neighbourhood growth areas, creating opportunities to align development with existing services and facilities whilst supporting investment in social infrastructure where required. The option may also provide greater flexibility to improve the accessibility and utilisation of infrastructure across the borough. Positive effects are therefore identified.

Overall, the assessment indicates that all options have the potential to support social infrastructure provision, although through different mechanisms. The principal distinction between the options relates to whether growth is accommodated through the provision of new infrastructure associated with land release, or through investment in and more efficient use of existing infrastructure within established urban areas. Options S4 and S1 perform well due to their ability to support growth alongside infrastructure improvements within existing communities, whilst Options S2 and S3 are subject to greater uncertainty regarding infrastructure capacity and delivery. Uncertainty regarding the timing, funding and delivery of infrastructure applies across all options.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA2: Improving Health	Effect	Positive	Uncertain	Uncertain	Positive
	Rank	2	3	4	1

Haringey experiences significant health inequalities, with marked differences in life expectancy, long-term health conditions, obesity and health outcomes between communities across the borough. Access to healthcare services, open space, active travel opportunities, employment, healthy environments and community facilities are all important determinants of health and wellbeing. The location and form of growth can influence these factors through the creation of healthy neighbourhoods, improvements to environmental quality and access to services and opportunities.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may influence access to health-promoting infrastructure, active travel opportunities, open space and healthy environments.

Option S1 would accommodate growth entirely within the existing urban area. This may place additional pressure on existing open spaces, local environmental quality and residential amenity in some locations but would support access to existing services, facilities and public transport Positive effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt, reducing the need for urban intensification. This may create opportunities to deliver new neighbourhoods incorporating active travel routes, public open space and community facilities. However, growth accommodated through land release may be located further from existing services and facilities than under more urban-focused approaches. Uncertain effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. Whilst this may support investment in facilities and services, the scale of growth proposed could place significant pressure on environmental quality, open spaces and health-supporting infrastructure. The extent to which healthy environments and supporting services could be delivered alongside growth is uncertain. Uncertain effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth distributed across a range of neighbourhood locations may support access to employment opportunities, open space, active travel routes, healthcare facilities and community infrastructure. The option may also provide opportunities to align growth with investment in healthcare and community facilities, improving the accessibility and utilisation of existing services whilst supporting provision in areas experiencing growth. Positive effects are therefore identified.

Overall, all options have the potential to support improvements in health and wellbeing through the delivery of housing, employment opportunities, services and supporting infrastructure. The principal distinction between the options relates to the distribution of growth and the extent to which development may support access to open space, active travel opportunities and healthy environments. Options S1 and S4 perform relatively well as growth would be accommodated across locations that maintain access to services, employment opportunities and community facilities whilst supporting opportunities for active travel and healthy neighbourhoods. Option S3 performs least favourably due to uncertainty regarding the cumulative effects of accommodating the highest levels of growth. Across all options, health outcomes will ultimately depend on the detailed location, design and delivery of development and associated infrastructure.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4

IIA3: Education	Effect	Positive	Positive	Significant positive	Positive
	Rank	=2	=2	1	=2

Haringey's education system plays an important role in supporting educational attainment, social mobility, skills development and access to employment opportunities. Demographic change will influence future demand for school places and, given current challenges associated with falling pupil numbers, growth that delivers family-sized housing may help maintain enrolment levels and support the continued operation of local schools. The location and form of growth may also affect opportunities to integrate educational provision, skills development and wider community infrastructure with new development.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may support the viability, renewal, expansion and delivery of educational facilities and learning opportunities. Falling school rolls is a key issue facing Haringey currently together with most other London boroughs.

Option S1 would accommodate growth entirely within the existing urban area. This option would support access to existing educational facilities and support the long-term viability of existing schools and educational infrastructure. Positive effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt. This approach would support the long-term viability of existing schools and educational infrastructure across the borough. Positive effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification This option would support the highest level of investment in educational facilities and training opportunities and generate the highest level of demand for school places and supporting educational infrastructure to secure the long-term viability of existing school sites in the borough many of which have falling school rolls. Significant positive effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth distributed across a range of neighbourhood locations may provide opportunities to coordinate educational provision with housing and employment growth and support investment in schools, training facilities and other learning opportunities in areas experiencing growth. Positive effects are therefore identified.

Overall, all options have the potential to support educational outcomes through an increase of residents to fill surplus places at existing schools. The maximum growth option S3 would have the greatest positive effects due to generating the biggest additional population.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA4: Air, Light and Noise Pollution	Effect	Uncertain	Uncertain	Significant negative	Positive
	Rank	= 2	=2	4	1

Haringey is designated as an Air Quality Management Area (AQMA) and the baseline review identifies that air pollution, noise and environmental quality issues are concentrated along major transport corridors and within some of the borough's more densely developed areas. Variations in environmental quality are closely linked to traffic levels, transport infrastructure and patterns of development. Future growth has the potential to influence air quality, noise levels and wider environmental conditions through changes in travel demand, development intensity and land use. At the same time, development can provide opportunities to incorporate green infrastructure, improve the public realm and reduce exposure to environmental pollutants through improved design and layout.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may influence air quality, noise, light pollution and wider environmental conditions across the borough.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. The compact pattern of development promoted by the option may support sustainable travel patterns and reduce reliance on private vehicles. However, accommodating growth through greater levels of urban intensification may increase pressure on areas already affected by traffic, noise and environmental quality issues. Uncertain effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt. This approach may reduce the need for the highest levels of urban intensification and associated environmental pressures within existing urban areas. However, growth accommodated through land release may generate additional travel demand and associated air quality and noise impacts in some locations. Uncertain effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. This option combines the highest levels of growth with the greatest levels of development activity and transport demand. As a result, it is considered most likely to increase pressure on air quality, noise environments and wider environmental quality. Significant negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth directed towards existing neighbourhoods, centres and accessible locations may provide opportunities to support active travel, reduce reliance on private vehicles and incorporate green infrastructure and environmental mitigation measures alongside development. Positive effects are therefore identified.

Overall, all options provide opportunities to improve environmental quality through the design of development, the incorporation of green infrastructure and support for sustainable travel. The principal distinction between the options relates to the scale and distribution of growth and the resulting pressure on areas already experiencing poor air quality and noise impacts. Options S4 performs best as growth would be accommodated through patterns of development that support sustainable travel whilst avoiding the highest levels of growth and development activity. Options S1 and S2 are subject to greater uncertainty due to the different environmental trade-offs associated with land release and significant urban intensification. Option S3 performs least favourably due to the scale of growth proposed and the associated increase in development activity, transport demand and environmental pressures. Uncertainty remains regarding the significance of effects under Options S1 and S2, as outcomes will depend on the location and design of future development and the effectiveness of mitigation measures.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA5: Climate Change Mitigation	Effect	Uncertain	Neutral	Significant negative	Positive
	Rank	2	3	4	1

Haringey has declared a climate emergency and is pursuing ambitious objectives to reduce greenhouse gas emissions and support the transition towards a net zero borough. Transport and buildings remain key sources of emissions, meaning that the location, density and form of development can significantly influence future carbon emissions through travel patterns, energy demand, construction activity and the efficient use of land. The spatial strategy options propose different approaches to accommodating growth and therefore differ in their potential climate change mitigation effects.

The principal distinction between the options relates to the balance between land release and urban intensification. Land release may require additional infrastructure and could increase travel distances in some locations, whilst more intensive development patterns may support sustainable travel and efficient use of land but can increase whole life carbon associated with taller buildings.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining all designated employment land, Metropolitan Open Land and Green Belt land. The compact development pattern promoted by the option may support sustainable travel patterns and efficient use of land. However, accommodating growth would require greater levels of urban intensification and a greater reliance on taller buildings, which may increase whole life carbon emissions associated with the construction and operation of tall buildings. Uncertain effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt land identified as Grey Belt, reducing the need for more extensive urban intensification and taller forms of development. The option may reduce some of the whole life carbon impacts associated with very high-density and high-rise development and could provide opportunities to deliver low-carbon development through comprehensive redevelopment schemes. However, the greater reliance on land release may increase the overall development footprint and reduce the compactness of growth. Neutral effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. The option combines the highest levels of land release with the greatest levels of intensification and a greater reliance on taller buildings than other options. This is likely to generate the greatest levels of whole life carbon emissions and resource consumption. Travel distances associated with extensive land release may also increase reliance on private vehicle trips and associated emissions. Significant negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth would continue to be directed towards accessible locations and supported by a design-led approach. The option may support low-carbon travel patterns and the efficient use of land whilst avoiding both the extensive land release proposed under Options S2 and the highest levels of intensification associated with Option S3. Positive effects are therefore identified.

Overall, all options have the potential to support climate change mitigation through the delivery of energy-efficient development and sustainable transport measures. The principal distinction between the options relates to the relative balance between land release and urban intensification. Land release options may provide opportunities for comprehensive low-carbon redevelopment but can result in a larger development footprint,

whilst intensification-led options may support sustainable travel and efficient use of land but can increase reliance on redevelopment and taller buildings associated with higher whole life carbon emissions. Option S4 performs relatively well as it supports compact growth whilst avoiding either the extensive land release proposed under Options S2 and or the highest levels of intensification associated with Option S1 and S3. Option S3 performs least favourably due to the scale of growth, increased travel distances associated with extensive land release and resource consumption associated with the option.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA6: Climate Adaptation and Resilience	Effect	Positive	Uncertain	Negative	Positive
	Rank	= 1	3	4	= 1

Haringey is vulnerable to a range of climate-related risks, including surface water flooding, fluvial flooding, overheating and urban heat island effects. The Council's Strategic Flood Risk Assessment identifies surface water flooding as the principal source of flood risk within the borough and highlights the role of sustainable drainage systems, urban greening, permeable surfaces and blue-green infrastructure in adapting to future climate conditions. In addition, climate change is expected to increase the frequency and intensity of extreme heat events, creating a need for development that supports urban cooling through tree planting, green infrastructure, shading, evaporative cooling, sustainable water management and the provision of accessible cool spaces within the public realm. The location, scale and form of growth can influence both exposure to climate risks and the ability to incorporate adaptation measures as part of development.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may support flood resilience, urban greening, sustainable drainage and wider climate adaptation measures.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. This would maximise the retention of open and permeable land that contributes to climate resilience. Accommodating growth through greater levels of urban intensification may increase exposure to overheating, urban heat island effects and surface water runoff within existing neighbourhoods but provides opportunities to deliver greening, cooling and flood mitigation interventions. The overall effect is positive.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt land identified as Grey Belt, reducing the need for more extensive urban intensification. This approach may create opportunities to incorporate sustainable drainage

systems, flood mitigation measures, urban greening, tree planting and climate adaptation measures as part of comprehensive redevelopment schemes. However, the release of open land may reduce some of the resilience benefits associated with undeveloped and permeable land. Uncertain effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. This option combines the highest levels of land release with the greatest levels of intensification and may place the greatest pressure on the borough's ability to adapt to future climate risks. The scale of development proposed could increase exposure to flooding, overheating and wider climate-related hazards whilst creating challenges in delivering adaptation measures consistently across all locations. Negative effects are therefore identified.

Option S4 would accommodate growth would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth distributed across a range of locations may provide opportunities to incorporate sustainable drainage systems, urban greening, flood risk management measures and improvements to the public realm alongside development. The option may also support climate adaptation by enhancing existing neighbourhoods through the creation of shaded streets, green infrastructure, cooling measures and accessible public spaces within growth areas. The distribution of growth across a range of locations may also provide greater opportunities to incorporate adaptation measures as part of comprehensive redevelopment and public realm improvements. Positive effects are therefore identified.

Overall, all options have the potential to support climate adaptation and resilience through the incorporation of sustainable drainage systems, urban greening and resilient design measures. The principal distinction between the options relates to the balance between protecting existing open land and accommodating growth in a manner that provides opportunities for adaptation measures to be incorporated into development. Options S1 and S4 perform relatively well as they provide opportunities to integrate flood risk management, urban greening, overheating mitigation and wider climate adaptation measures alongside growth. Option S3 performs least favourably due to the scale of development proposed and the resulting climate resilience challenges associated with extensive land release and urban intensification. Some uncertainty remains across all options, as the effectiveness of adaptation measures will ultimately depend on the location, design and delivery of future development and associated green and blue infrastructure.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
	Effect	Neutral	Neutral	Negative	Neutral

IIA7: Water Resources and Pollution	Rank	=1	=1	4	=1

Haringey is located within a water-stressed region and future growth is expected to increase demand for water resources and wastewater infrastructure. The baseline review identifies the importance of reducing water consumption, improving water efficiency and ensuring that wastewater and drainage infrastructure can accommodate future growth. Development can also provide opportunities to incorporate water-efficient design, sustainable drainage measures and sustainable water management practices that reduce pressure on water resources and help protect water quality.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may influence water consumption, wastewater generation and demand for supporting infrastructure.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. Whilst this approach would avoid development on open land, it would still lead to associated increases in water demand and wastewater generation within existing urban areas. Neutral effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt. Whilst this would increase demand for water resources and wastewater infrastructure, opportunities would exist to incorporate water-efficient design, sustainable drainage systems and sustainable water management measures alongside new development. Neutral effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. This option would generate the highest level of demand for water resources and wastewater infrastructure and is likely to result in the greatest levels of household water consumption and wastewater generation. Whilst mitigation measures could be incorporated, uncertainty remains regarding the extent to which impacts could be effectively managed across the scale of growth proposed. Negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth distributed across a range of locations may provide opportunities to incorporate water efficiency measures, sustainable drainage systems and sustainable water management practices alongside development. Neutral effects are therefore identified.

Overall, all options provide opportunities to incorporate water efficiency measures, sustainable drainage systems and sustainable water management practices within future development. The principal distinction between the options relates to the scale and distribution of growth and the resulting demand for water resources and wastewater infrastructure. Options S3 performs least favourably due to the scale of growth proposed and the resulting pressure on water resources and wastewater infrastructure.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA8: Biodiversity and Open Space	Effect	Positive	Negative	Significant negative	Positive
	Rank	1	3	4	2

Haringey contains an extensive biodiversity network comprising Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves, parks, woodlands, allotments, waterways and ecological corridors. The baseline review identifies the importance of maintaining habitat connectivity, protecting designated biodiversity assets and supporting opportunities for habitat enhancement and nature recovery. Key assets include the Lea Valley, New River, Parkland Walk, Coldfall Wood, Highgate Wood and Queen's Wood. The location and form of development can influence biodiversity both through direct impacts on habitats and through opportunities for ecological enhancement and improved connectivity.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may affect biodiversity assets, ecological networks, habitat connectivity and open space resources.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. This option would avoid direct impacts arising from land release and retain the greatest extent of open land, habitat resources and ecological corridors. Whilst urban intensification could create localised pressures on biodiversity, the option would provide the strongest basis for protecting designated sites, maintaining ecological connectivity and supporting nature recovery. Significant positive effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt land identified as Grey Belt. Whilst opportunities may exist to incorporate biodiversity enhancements and habitat creation within redevelopment schemes, the release of open land would increase pressure on habitats, ecological corridors and green infrastructure assets. Negative effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. This option combines the highest levels of land release with the greatest scale of development activity and is therefore likely to place the greatest pressure on biodiversity assets, habitat connectivity and open space resources. The potential for habitat fragmentation and ecological disturbance is greatest under this option. Significant negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Whilst some pressure on biodiversity assets and open land would occur, the more limited extent of land release compared with Options S2 and S3 may provide opportunities to incorporate biodiversity enhancements, habitat creation and ecological connectivity measures alongside development. Positive effects are therefore identified though to a lesser extent that Option S1.

Overall, all options provide opportunities to incorporate biodiversity enhancements and habitat improvements through the planning and design of development. The principal distinction between the options relates to the extent of land release and the resulting pressure on biodiversity assets, ecological networks and open space resources. Option S1 performs most favourably as it avoids the release of Metropolitan Open Land and Green Belt and provides the greatest protection for habitats and ecological corridors. Options S2 and S3 perform least favourably due to the scale of land release and associated pressure on biodiversity and open space resources.

IIA objective	IIA outcomes	Option S1	Option S1	Option S2	Option S3
IIA9: Soils and Minerals	Effect	Significant positive	Negative	Significant negative	Positive
	Rank	1	3	4	2

Haringey is a predominantly urban borough with limited unconstrained land available for development. The baseline review identifies that accommodating future growth will require careful management of finite land resources and consideration of the extent to which development is directed towards previously developed land, urban intensification and the protection of undeveloped land. Whilst the borough contains relatively limited soil resources due to its urban character, Metropolitan Open Land and Green Belt land continue to perform important environmental,

recreational and landscape functions. The location and form of development can therefore influence the extent to which finite land resources are protected or developed.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may require land take, redevelopment and intensification. The principal distinction between the options relates to the balance between development on previously developed land and the release of open land for development.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. This would maximise protection of undeveloped land resources, avoid the release of open land for development and direct growth towards redevelopment and intensification within the existing urban area. Significant positive effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt land. Whilst this approach may reduce the need for more substantial urban intensification, it would require the development of a greater amount of undeveloped land than more urban-focused alternatives. Negative effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. The option combines the highest levels of land release with the greatest levels of intensification and would place the greatest overall pressure on land resources. The option is likely to result in the largest amount of land being utilised for development purposes and would place the greatest pressure on undeveloped land and natural resources. Significant negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Some undeveloped land would be released for development but this option would generally make effective use of previously developed land. Positive effects are therefore identified.

Overall, all options involve trade-offs between accommodating growth and protecting finite land resources. Options S2 and S3 would require greater levels of land release and therefore result in increased pressure on undeveloped land resources. Options S1 and S4 perform relatively well as a significant proportion of growth would be accommodated through redevelopment and intensification within the existing urban area, . Option S1 performs most favourably as it maximises the protection of undeveloped land resources and avoids the release of Metropolitan Open

Land and Green Belt land. Option S3 performs least favourably due to the combined effects of extensive land release and significant growth pressures on finite land resources.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA10: Social Inclusion and Equality	Effect	Neutral	Uncertain	Uncertain	Positive
	Rank	2	4	3	1

Haringey experiences significant social, economic and health inequalities, with marked differences in deprivation, access to services, employment opportunities and health outcomes across the borough. Improving access to housing, employment, community facilities, public transport and public open space is an important component of addressing these inequalities and supporting social inclusion. The spatial strategy options propose different approaches to the location and form of growth, which may influence access to opportunities and services across the borough.

Option S1 would accommodate growth entirely within the existing urban area. This may support access to existing services, facilities and employment opportunities. However, opportunities to distribute growth and investment across a wider range of locations may be more limited than under alternatives involving land release. Neutral effects are therefore identified.

Option S2 would accommodate growth primarily through the release of employment land, Metropolitan Open Land and Green Belt. This may provide opportunities for new housing, community facilities and supporting infrastructure to be delivered, however some development may be located further from existing services, facilities and employment opportunities. The release of employment land may also alter the distribution of employment opportunities in some locations. Uncertain effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. The scale of development proposed could increase access to housing and employment opportunities across the borough. However, there is uncertainty regarding the extent to which the benefits of growth would be distributed evenly across communities and whether access to services, facilities and employment opportunities would improve in areas experiencing the greatest deprivation. Uncertain effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth would be distributed across a range of neighbourhood growth areas, which may improve access to housing, employment opportunities, services and community facilities across a broader range of locations within the borough. Additional opportunities may also arise to improve connections between homes, jobs, services and public spaces. Positive effects are therefore identified.

Overall, all options have the potential to support social inclusion through the delivery of housing, employment opportunities and associated services. The principal distinction between the options relates to the distribution of growth and the extent to which development may improve access to opportunities across different parts of the borough. Options S1 and S4 perform relatively well as growth would be distributed across a range of locations whilst maintaining access to employment opportunities, services and community facilities. Option S2 performs least favourably due to uncertainty regarding how effectively the benefits of growth would be distributed across communities. Across all options, the extent to which development contributes to reducing deprivation and wider inequalities will depend on the detailed location, design and delivery of development, alongside wider social and economic interventions beyond the scope of the Local Plan.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA11: Historic Environment, Culture and Character	Effect	Negative	Uncertain	Significant negative	Positive
	Rank	3	2	4	1

Haringey has a rich and varied historic environment comprising conservation areas, listed buildings, locally listed buildings, registered parks and gardens, archaeological priority areas, historic landscapes and important local views. The borough's distinctive character is derived from its varied settlement history, historic high streets, employment areas, cultural assets and diverse neighbourhood identities. The baseline review identifies that accommodating growth whilst conserving heritage significance, local character and townscape quality is a key challenge for the Local Plan.

The spatial strategy options propose different approaches to the location and form of development and therefore differ in the extent to which they may affect heritage assets, archaeological remains, historic character, townscape quality, cultural infrastructure and local distinctiveness. The principal distinction between the options relates to the balance between land release, redevelopment and urban intensification, and the extent to which growth may affect the character and setting of existing places.

Option S1 would accommodate growth entirely within the existing urban area and would maximise protection of employment land, Metropolitan Open Land and Green Belt land identified as Grey Belt. Although this would provide the greatest protection for open landscapes and employment areas, accommodating growth would require greater levels of urban intensification and a greater reliance on taller buildings. This may place pressure on the character, appearance and setting of existing neighbourhoods, heritage assets and important views. Negative effects are therefore identified.

Option S2 would accommodate growth primarily through the release of employment land, Metropolitan Open Land and Green Belt, reducing the need for more extensive urban intensification and taller forms of development. This may reduce pressure on some conservation areas, heritage settings, important views and established townscapes within the existing urban area. However, the release of open land and redevelopment of employment land may affect historic landscapes, archaeological assets, industrial heritage and established character areas. Overall, uncertain effects are identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. This option would require the highest levels of intensification assessed and may necessitate building heights and densities beyond those envisaged through the borough's design-led tall buildings evidence base. The option is therefore considered likely to result in adverse effects on heritage assets, townscape character, important views and local distinctiveness. Whilst redevelopment may provide opportunities for investment in heritage assets and public realm improvements, significant negative effects are identified overall.

Option S4 would accommodate growth would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Development would continue to be guided by a design-led approach and neighbourhood-based placemaking principles, which may provide opportunities to respond positively to local character, heritage significance and townscape sensitivities. However, redevelopment and co-location may result in some changes to the character of employment areas and could affect industrial heritage assets, creative industries and established employment character. Positive effects are identified.

Overall, the assessment indicates that all options involve trade-offs between accommodating growth and conserving Haringey's historic environment and local character. Land release options may reduce pressure for extensive urban intensification but could affect historic landscapes, industrial heritage assets and established character areas. Intensification-led options avoid the loss of open land but may create pressure for taller buildings and higher densities, with potential effects on townscape character, heritage settings and important views. Option

S3 performs least favourably as it is considered likely to result in adverse effects on heritage assets, townscape character, important views and local distinctiveness.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA12: Transport and Connectivity	Effect	Positive	Negative	Uncertain	Positive
	Rank	1	4	3	2

Haringey benefits from a well-connected public transport network, including the Underground, London Overground, National Rail and a comprehensive bus network. Locations such as Wood Green, Tottenham Hale, Seven Sisters and the High Road corridor benefit from high levels of accessibility. However, the baseline review identifies challenges including variations in accessibility across the borough, barriers created by major roads and railway infrastructure, pressure on parts of the transport network, and the need to strengthen walking, cycling and east-west connections. The location and form of growth can influence travel patterns, accessibility and opportunities to increase the proportion of journeys made by sustainable modes of transport.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may support public transport use, active travel and wider connectivity improvements.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. The compact pattern of development promoted by the option may maximise opportunities for public transport use, walking and cycling through the concentration of growth in accessible urban locations. However, the levels of urban intensification required may place additional pressure on existing transport networks and infrastructure. Positive effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt land identified as Grey Belt, reducing the need for more extensive urban intensification. This may provide opportunities to deliver transport improvements and active travel infrastructure, however some growth may be accommodated in locations that are less accessible than established town centres and transport hubs, potentially resulting in longer journeys and increased reliance on private vehicles. Negative effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. Whilst this approach could support investment in transport infrastructure and increase demand for public transport services, it would also place the greatest pressure on existing transport networks and infrastructure. Uncertainty therefore exists regarding whether transport improvements could be delivered at a pace consistent with development. Uncertain effects are therefore identified.

Option S4 would accommodate growth through growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth distributed across neighbourhoods and centres may support increased use of public transport, walking and cycling whilst providing opportunities to improve connectivity as part of redevelopment and public realm improvements. Positive effects are therefore identified.

Overall, all options have the potential to support improvements in transport and connectivity through investment in public transport, active travel infrastructure and public realm improvements. The principal distinction between the options relates to the extent to which growth is concentrated in accessible urban locations or accommodated through land release. Options S1 and S4 perform well as they support development patterns that can increase the use of sustainable transport modes and improve access to services, employment and facilities. Option S2 performs least favourably due to risks growth may be accommodated in locations that are less accessible than established town centres and transport hubs, potentially resulting in longer journeys and increased reliance on private vehicles.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA13: Waste	Effect	Neutral	Neutral	Negative	Neutral
	Rank	=1	=1	4	=1

The baseline review identifies that future growth will increase demand for construction materials and generate additional construction, demolition and household waste. The efficient use of resources, re-use of buildings and materials, and application of circular economy principles will therefore play an important role in minimising waste generation and supporting sustainable development. The location and form of growth can influence the amount of demolition, redevelopment and new construction required, as well as opportunities to make efficient use of existing buildings, infrastructure and resources.

The spatial strategy options propose different approaches to accommodating growth and therefore differ in the extent to which they may influence waste generation, resource consumption and opportunities to support circular economy principles.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. This approach would maximise the use of existing urban land and infrastructure and avoid development on undeveloped land. However, accommodating growth through greater levels of urban intensification may require increased demolition, redevelopment and reconstruction activity, generating significant quantities of construction and demolition waste. Neutral effects are therefore identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt. Whilst opportunities would exist to incorporate resource efficiency measures and circular economy principles within development schemes, the option would require substantial new development and associated consumption of materials and resources. Neutral effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. This option would generate the highest levels of development activity and would therefore be expected to result in the greatest levels of construction, demolition and household waste. Whilst mitigation measures could reduce impacts, uncertainty remains regarding the extent to which waste generation could be minimised at the scale of growth proposed. Negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth would be accommodated through a combination of redevelopment, intensification and limited land release, creating opportunities for the re-use of buildings and materials and the incorporation of circular economy measures within development schemes. The option may reduce reliance on both extensive land release and the highest levels of demolition and redevelopment associated with more intensification-led approaches. Neutral significant effects are therefore identified.

Overall, all options provide opportunities to incorporate circular economy principles and resource efficiency measures within future development. The principal distinction between the options relates to the balance between land release, redevelopment and the extent of new construction required. Option S3 performs least favourably due to the scale of development activity, resource consumption and waste generation associated with the option.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4

IIA14: Housing	Effect	Neutral	Positive	Significant positive	Positive
	Rank	4	3	1	2

The baseline review identifies significant housing pressures across Haringey, including affordability challenges, overcrowding, homelessness and a substantial need for additional market and affordable housing. Increasing housing supply and delivering a range of homes that meet different needs remains a key objective of the Local Plan.

The spatial strategy options propose different approaches to accommodating growth and therefore differ significantly in the amount of development capacity available for housing delivery. The principal distinction between the options relates to the extent of land release and urban intensification required to accommodate new homes.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt land. Housing delivery would be dependent upon urban intensification and redevelopment opportunities within the existing urban area. The option is the most constrained in terms of available land supply and development opportunities. Neutral effects are identified.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt. This approach would provide significant opportunities for housing delivery and increase the amount of land available for development. The option has potential to make a key contribution towards meeting housing needs but land released from other uses can give rise to housing delivery challenges. Positive effects are identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. The option would provide the greatest opportunity to increase housing supply and maximise flexibility in identifying sites capable of delivering new homes. Significant positive effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. The option would support the delivery of a substantial number of homes through a range of growth mechanisms. Positive effects are therefore identified.

Overall, all options have the potential to contribute towards meeting Haringey's housing needs, although they differ significantly in the development capacity they make available and in terms of how easy different types of land are to bring forward for housing. The principal distinction between the options relates to the extent of land release and the resulting flexibility to accommodate housing growth. Options S2 and S3 perform most positively as they provide the greatest opportunities to increase housing supply and expand development capacity. Options S3 and S4 also support housing delivery, although growth is more constrained by employment land retention and more limited land release. Option S1 performs least favourably as housing growth would be accommodated entirely through intensification of the existing urban area, resulting in constrained capacity for additional housing delivery.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA15: Economy and Employment	Effect	Positive	Significant negative	Yes - Negative	Neutral
	Rank	1	4	3	2

The baseline review identifies that Haringey continues to experience demand for industrial land, employment floorspace and workspace to support existing and future businesses. Employment areas play an important role in supporting economic growth, local jobs, logistics, industrial activity, creative industries and small businesses. The borough's employment evidence indicates that maintaining an adequate supply of employment land will be important in supporting future economic needs and reducing pressure for the continued loss of industrial floorspace.

The spatial strategy options propose different approaches to accommodating growth and therefore differ significantly in the extent to which they retain, release or redevelop employment land. This influences their ability to support employment floorspace, business activity and long-term economic resilience.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining and safeguarding all designated employment land. The option would support employment growth through intensification, modernisation and improved utilisation of existing employment areas. Positive effects are therefore identified, although opportunities to accommodate growth elsewhere may be more constrained than under Option S4.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land and Green Belt land. Whilst this option may support housing delivery and economic activity associated with redevelopment, the large-scale release of industrial land would reduce the

amount of employment land available to accommodate future business growth and industrial needs. Significant negative effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. Whilst the option could generate economic benefits associated with construction activity, housing delivery and commercial development, the extensive release of employment land would impact negatively on the borough's ability to accommodate identified industrial and employment needs over the plan period. Significant negative effects are therefore identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. The option would continue to support employment growth through industrial intensification, co-location and the modernisation of employment areas. However, some employment land and operations may be impacted by new residential uses. This option performs less favourably than option S1. Neutral effects are therefore identified.

Overall, the principal distinction between the options relates to the extent to which employment land is retained, released or redeveloped. Options S1 and S4 perform most positively as they retain the borough's designated employment land and support opportunities for industrial intensification and modernisation. Option S1 performs most favourably as it provides the greatest opportunity to accommodate identified employment needs whilst maintaining a resilient supply of employment land. Options S2 and S3 perform least favourably due to the scale of employment land release proposed and the resulting risks to long-term employment capacity.

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA16: Town Centres	Effect	Positive	Positive	Positive	Positive
	Rank	=1	=1	=1	=1

Haringey's network of town and local centres performs an important economic, social and cultural role. Centres such as Wood Green, Seven Sisters, Crouch End, Muswell Hill and Hornsey provide a concentration of retail, employment, leisure, community and cultural uses and play a key role in supporting local identity and access to services. The baseline review identifies the need to maintain and strengthen the vitality and viability of centres in the context of changing retail patterns, increasing competition from online retailing and changing patterns of work and leisure.

The spatial strategy options propose different approaches to the location and distribution of growth and therefore differ in the extent to which they may support footfall, spending, investment and the mix of uses that contribute to successful town centres.

Option S1 would accommodate growth entirely within the existing urban area whilst retaining employment land, Metropolitan Open Land and Green Belt. The option would support investment and continued activity within centres and may increase footfall through higher-density development in existing urban locations and redevelopment within centres themselves. There is a risk that commercial, employment, cultural and community uses could be displaced in favour of housing-led development, potentially reducing the diversity of activities that support successful centres. Positive effects are therefore identified.

Option S2 would accommodate growth primarily through the release of employment land, Metropolitan Open Land and Green Belt land. This may increase housing delivery and support additional footfall and expenditure within centres. However, some potential spend may be lost if land release is in less accessible locations. Positive effects are therefore identified.

Option S3 would seek to maximise housing and economic growth through extensive land release and urban intensification. Thise option would increase population, footfall and expenditure within centres. However, some potential spend may be lost if land release is in less accessible locations. There is a risk that commercial, employment, cultural and community uses could be displaced in favour of housing-led development, potentially reducing the diversity of activities that support successful centres. Positive effects are identified.

Option S4 would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. Growth distributed across neighbourhoods and centres may support increased footfall, investment and activity within existing centres whilst maintaining a mix of housing, employment, retail, cultural and community uses. The option may also provide additional opportunities for mixed-use redevelopment and investment within centres, supporting their continued role as locations for housing, employment, services and cultural activity. Positive effects are therefore identified.

Overall, all options have the potential to support the vitality and viability of Haringey's centres through additional population growth, spending and investment. The principal distinction between the options relates to the distribution of growth and the extent to which centres are supported by a mix of housing, employment, retail, cultural and community uses.

Table 5.2: Summary findings for the assessment of spatial strategy options

IIA objective	IIA outcomes	Option S1	Option S2	Option S3	Option S4
IIA1: Social Infrastructure	Effect	Positive	Uncertain	Uncertain	Positive
	Rank	2	3	4	1
IIA2: Improving Health		Positive	Uncertain	Uncertain	Positive
	Rank	2	3	4	1
IIA3: Education	Effect	Positive	Positive	Significant positive	Positive
	Rank	=2	=2	1	=2
IIA4: Air, Light, Noise Pollution	Effect	Uncertain	Uncertain	Significant negative	Positive
	Rank	= 2	=2	4	1
IIA5: Climate Change Mitigation	Effect	Uncertain	No	Significant negative	Positive
	Rank	2	3	4	1
IIA6: Climate Adaptation and Resilience	Effect	Positive	Uncertain	Negative	Positive
	Rank	= 1	3	4	= 1
IIA7: Water Resources and Pollution	Effect	Neutral	Neutral	Negative	Neutral
	Rank	=1	=1	4	=1
IIA8: Biodiversity and Open Space	Effect	Positive	Negative	Significant negative	Positive
	Rank	1	3	4	2
IIA9: Soils and Minerals	Effect	Significant positive	Negative	Significant negative	Positive
	Rank	1	3	4	2
	Effect	Neutral	Uncertain	Uncertain	Positive

IIA10: Social Inclusion and Equality	Rank	2	4	3	1
IIA11: Historic Environment, Culture and Character	Effect	Negative	Uncertain	Significant negative	Positive
	Rank	3	2	4	1
IIA12: Transport and Connectivity	Effect	Positive	Negative	Uncertain	Positive
	Rank	1	4	3	2
IIA13: Waste	Effect	Neutral	Neutral	Negative	Neutral
	Rank	=1	=1	4	=1
IIA14: Housing	Effect	Neutral	Positive	Significant positive	Positive
	Rank	4	3	1	2
IIA15: Economy and Employment	Effect	Positive	Significant negative	Significant negative	Neutral
	Rank	1	4	3	2
IIA16: Town Centres	Effect	Positive	Positive	Positive	Positive
	Rank	=1	=1	=1	=1
Overall ranking based on average score across 16 objectives		**2**	**3**	**4**	**1**

Summary Conclusion

Option S3 would provide the greatest amount of development capacity across the borough and support the highest level of housing delivery. However, it would also generate the greatest impact and pressure on employment land, infrastructure, transport networks, environmental assets, water resources, biodiversity, heritage assets and local character. The option combines extensive land release with significant urban intensification and would require a scale of development beyond that assumed by much of the Council's evidence base, including the Council's Tall Buildings Study. As a result, it performs least favourably across a number of environmental and social objectives.

Option S2 would accommodate growth through the release of employment land, Metropolitan Open Land (MOL) and Green Belt, reducing reliance on the highest levels of urban intensification. This approach performs relatively strongly against housing provision objectives but would require significant land release and performs less favourably against objectives relating to biodiversity, soils and minerals, long-term employment capacity and the protection of environmental assets.

Option S1 would maximise the protection of designated employment land, Metropolitan Open Land and Green Belt land and performs well against a wide range of objectives relating including biodiversity and soils and minerals. However, accommodating growth entirely within the existing urban area would require greater levels of urban intensification and a greater reliance on taller buildings, increasing pressure on townscape character, heritage assets, and environmental quality in some locations.

Overall, Option S4 performs positively across the widest range of sustainability objectives. The option would accommodate growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. The assessment indicates that this approach performs relatively well across social, environmental and economic objectives whilst avoiding both the extensive land release proposed under Options S2 and S3 and the highest levels of urban intensification associated with Option S1 and S3.

The assessment demonstrates that no option performs most favourably against every objective and that each alternative involves trade-offs. However, when considered across the full range of Integrated Impact Assessment objectives, Option S4 achieves the most favourable overall outcome and is therefore identified as the preferred spatial strategy option.

5.2.2 Assessment of Housing Growth Options

Three options have been identified for appraisal:

- **Option H1: Housing Need-Led Growth** - Haringey seeks to meet housing needs derived by the NPPF Standard Methodology over the period 2028/9 to 2037/8 (28,413 homes net).
- **Option H2: London Plan 2021 and Capacity-Led Growth** - Haringey seeks to meet the adopted London Plan housing requirement up to 2028/9. Housing delivery from 2029/30 to 2037/8 would be informed by the borough's identified development capacity (18,300 new homes net).

- **Option H3: Draft London Plan 2026** – Haringey seeks to meet the housing requirement identified by the Draft London Plan over the period 2028/9 until 2037/38 (18,911 homes net).

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA1 Social Infrastructure	Effect	Significant negative	No	Uncertain
	Rank	3	1	2

The options propose varying levels of planned housing delivery over the period 2028/9 to 2037/8 and, generally, the higher the level of growth, the greater the demand placed on existing social infrastructure, including healthcare, community facilities and utilities infrastructure. This is reflected in the ranking of the options, with the highest growth options performing less favourably.

Whilst higher levels of growth may generate additional investment and create opportunities for strategic improvements to social infrastructure, there is also a greater risk that housing delivery would outpace the provision of supporting infrastructure. This is particularly relevant where substantial levels of urban intensification are required and where additional development opportunities may need to be identified beyond those currently evidenced through the Council's evidence base.

Option H1 would deliver the highest level of housing growth and is therefore considered most likely to place significant pressure on healthcare facilities, community infrastructure and wider service provision. However, the option may also provide the greatest opportunities for infrastructure investment and the delivery of new facilities associated with growth. The option would require substantial growth beyond current identified development opportunities. Significant negative effects are identified.

Options H2 is considered more likely to enable social infrastructure provision to be planned and delivered alongside growth. Option H2 would align housing delivery with currently identified development capacity and would avoid the need for a substantive amount of residential development on employment land where social infrastructure may not be sufficiently accessible. Neutral effects are identified.

Option H3 also performs more favourably than the higher-growth alternative in relation to this objective. It would generate opportunities for investment in social infrastructure associated with urban intensification. Effects are considered more uncertain than option H2 due to the level of

growth expected on employment land additional and uncertainty regarding the extent to which supporting infrastructure could be delivered alongside this growth.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA2 Improving Health	Effect	Negative	Positive	Positive
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. The provision of new homes has the potential to contribute positively to health and wellbeing through reducing overcrowding, improving housing quality and supporting access to suitable accommodation. However, higher levels of growth are also likely to increase pressure on healthcare facilities, open spaces, recreational infrastructure and wider environmental resources that contribute to healthy living, even though they may also support investment in health infrastructure and wider improvements to the built environment.

Option H1 would deliver the highest level of housing growth and therefore make the strongest contribution towards addressing housing need, overcrowding and housing affordability pressures. The option may also provide the greatest opportunity to secure investment in healthcare facilities, active travel infrastructure and green infrastructure improvements. However, it is also considered most likely to place significant pressure on existing healthcare facilities, community infrastructure and open spaces. In addition, the substantial levels of urban intensification required may have implications for residential amenity, environmental quality and access to green infrastructure. For these reasons, likely negative effects are identified.

Options H2 and H3 would support the delivery of new homes whilst reducing pressure on healthcare facilities, open space and environmental assets relative to the higher-growth alternative. Option H2 does not involve industrial land release and is considered more likely to provide a balanced relationship between housing delivery and the infrastructure, environmental and placemaking objectives that contribute to health and wellbeing. Positive effects are identified for both options H2 and H3.

Overall, the assessment indicates that Option H2 may perform more favourably against this objective than the alternatives assessed. Whilst delivering fewer homes than the higher-growth alternative, the option may provide a more balanced and deliverable approach to growth, supporting the delivery of healthy neighbourhoods whilst limiting pressure on healthcare infrastructure, environmental quality and other determinants of health. Option H3 also performs positively in this respect. However, uncertainty remains regarding the health outcomes from development on industrial land.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA3 Education	Effect	Significant positive	Positive	Positive
	Rank	1	3	2

The options propose varying levels of housing delivery over the period 2028/8 to 2037/8. New housing growth has the potential to help fill surplus school places in Haringey and support investment in educational facilities through developer contributions and planned infrastructure provision. This is reflected in the ranking of the options.

Haringey has recently experienced demographic change that has affected school rolls in parts of the borough and contributed to pressure on the viability of some educational facilities. In this context, housing growth may not only increase demand for school places but may also help support the continued operation of existing schools and improve opportunities for investment in educational and training facilities.

Option H1 would deliver the highest level of housing growth and therefore has the greatest potential to increase demand for primary, secondary and post-16 educational provision. Significant positive effects are identified.

Options H2 and H3 would both help maintain the viability of existing educational facilities although to a lesser extent that the higher-growth alternatives. Positive effects are identified for both options with Option 3 scoring slightly more favourably due to the slightly higher level of housing delivery proposed.

Overall, the assessment indicates that Option H1 performs y more favourably against this objective than the alternatives assessed. This is because it has greater ability to support the viability of Haringey's existing schools which are subject to falling school rolls. Options H2 and H3 also perform postively.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA4 Air, Light and Noise Pollution	Effect	Significant negative	Neutral	Neutral
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with increased development activity, construction impacts, transport movements and pressure on existing infrastructure, all of which have the potential to affect air quality and increase exposure to noise and light pollution. This is reflected in the ranking of the options, with the highest growth options performing less favourably.

With the whole of Haringey being a declared Air Quality Management Area (AQMA), the impacts for air quality could be significant under any option. Development will need to carefully consider mitigation and the priorities of the Air Quality Action Plan (AQAP). Existing environmental burdens are concentrated along major transport corridors and in parts of the borough that already experience poorer environmental quality. Growth therefore has the potential to exacerbate existing air quality and noise issues unless appropriate mitigation measures are implemented.

Whilst higher levels of growth may support investment in public transport, active travel infrastructure and environmental improvements, they are also likely to generate greater development pressures across the borough. The extent of these pressures is anticipated to increase as higher levels of urban intensification and redevelopment are required to accommodate growth.

Option H1 would deliver the highest level of housing growth and is therefore considered most likely to increase pressure on air quality, noise environments and wider environmental quality. The substantial level of urban intensification and land release required, together with increased transport movements and development activity, is likely to result in significant negative effects.

Options H2 and H3 would align housing delivery more closely with identified development capacity and may enable growth to be directed towards locations where environmental impacts can be more effectively managed. These options are therefore considered less likely to result in adverse effects than the higher-growth alternative. These options are anticipated to have neutral effects. Environmental impacts associated with the growth on industrial land are subject to some uncertainty so option H2 scores more favourably of the two options.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed. Whilst development would still generate some air quality, noise and light pollution impacts, the level and location of growth may reduce pressure on transport networks and lessen the need for substantial urban intensification. The option may also provide greater opportunity to incorporate design-led mitigation measures and environmental improvements alongside development.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA5: Climate Change Mitigation	Effect	Significant negative	Neutral	Neutral
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with increased construction activity, embodied carbon emissions, energy demand and transport movements, all of which have implications for greenhouse gas emissions and the borough's ability to achieve its net zero ambitions.

At the same time, higher density development in accessible locations can support more sustainable travel patterns and facilitate investment in low-carbon infrastructure. The extent to which these benefits are realised is likely to depend on the scale and location of growth, together with the ability of development to be delivered in accordance with the Council's climate change policies.

Option H1 would deliver the highest level of housing growth and would therefore be expected to generate the greatest level of construction activity, resource consumption and associated carbon emissions. Whilst the option may support investment in low-carbon infrastructure, sustainable transport improvements and the delivery of larger-scale low-carbon energy networks, it would also require substantial urban intensification and potentially the identification of development opportunities beyond those currently evidenced. Significant negative effects are identified.

Options H2 and H3 would align housing delivery more closely with identified development capacity. These options may be less likely to result in adverse climate change mitigation effects than the higher-growth alternative. Neutral effects are identified.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed. Whilst development would still generate greenhouse gas emissions and increase energy demand, the lower level of growth may reduce

development pressures relative to the higher-growth alternative. The option does not involve industrial land release and may also provide greater flexibility to balance housing growth alongside wider climate change objectives and support the delivery of low-carbon, design-led development.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA6: Climate Adaptation and Resilience	Effect	Significant negative	Neutral	Uncertain
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with greater pressure on land, infrastructure and environmental resources, which may increase exposure to climate-related risks including flooding, overheating and extreme weather events. However, larger-scale growth may also create opportunities to deliver strategic flood mitigation, urban greening and climate adaptation measures alongside development. This is reflected in the ranking of the options, with the highest growth options performing less favourably.

Haringey is already affected by climate-related risks, particularly surface water flooding, whilst climate projections indicate increasing risks associated with flooding, overheating and the urban heat island effect. Accommodating growth in a way that supports climate resilience is therefore a key consideration.

Option H1 would deliver the highest level of housing growth and is therefore considered most likely to increase pressure on land and infrastructure. The substantial levels of urban intensification required may reduce opportunities for urban greening, increase the extent of hard surfacing and contribute to overheating in parts of the borough. Whilst the option may create opportunities to secure strategic investment in flood mitigation, urban greening and climate adaptation infrastructure, the scale of growth proposed would also place greater pressure on land and infrastructure. Significant negative effects are identified.

Option H3 would also support a relatively high level of growth and urban intensification. Whilst climate resilience measures could be incorporated into development and growth may support investment in adaptation infrastructure, uncertainty remains regarding the ability of the borough to accommodate the scale of growth proposed whilst effectively managing future climate risks.

Options H2 and H3 would align housing delivery more closely with identified development capacity and may provide greater flexibility to incorporate flood resilience measures, urban greening and climate adaptation interventions alongside development. These options may be less likely to result in adverse climate resilience effects than the higher-growth alternative. Option H3 involves industrial land release and potential effects are considered to be uncertain. Option H2 is identified to have neutral effects.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed. Whilst development would still need to address flood risk, overheating and other climate hazards, the lower level of growth and proposed locations for growth may reduce development pressure relative to the higher-growth alternative and the other alternative which includes industrial land release. Option H2 may also support a more balanced approach to growth that is better able to respond to identified climate risks and infrastructure constraints.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA7: Water Resources and Pollution	Effect	Negative	Neutral	Neutral
	Rank	3	=1	=1

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8 and, consequently, differing levels of demand for water resources, wastewater infrastructure and surface water drainage systems. Higher levels of growth are generally associated with increased water consumption, wastewater generation and greater pressure on drainage and water management infrastructure. This is reflected in the ranking of the options, with the highest growth options performing less favourably.

Haringey is located within a water-stressed region and future growth is expected to increase demand for water resources and wastewater infrastructure. Sustainable management of water resources, minimising water consumption and maintaining water quality are therefore important considerations when accommodating future development. Development also presents opportunities to improve water efficiency, reduce consumption and support investment in water and wastewater infrastructure.

Option H1 would deliver the highest level of housing growth and would therefore be expected to place the greatest demand on water resources and wastewater infrastructure. The option would require substantial levels of development activity, increasing overall water consumption and wastewater generation. Whilst the option may create opportunities for investment in water infrastructure, water efficiency measures and wider

infrastructure improvements, uncertainty remains regarding the extent to which infrastructure upgrades could fully accommodate the scale of growth proposed. Negative effects are identified.

Options H2 and H3 may be less likely to result in adverse effects than the higher-growth alternative. Whilst development would be expected to incorporate water efficiency measures and sustainable water management practices in accordance with Local Plan policies, uncertainty remains regarding the extent to which impacts could be effectively managed across the scale of growth proposed. Neutral effects are identified for both options.

Overall, the assessment indicates that Options H2 and H3 perform equally more favourably against this objective than the higher-growth alternative. Whilst development would still increase demand for water resources and wastewater infrastructure, the lower level of growth may reduce pressure on water resources and associated infrastructure relative to the higher-growth alternatives. The options may also provide greater opportunity to ensure that water efficiency measures and wider water management improvements are delivered alongside growth.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA8: Biodiversity and Open Space	Effect	Significant negative	Neutral	Neutral
	Rank	3	=1	=1

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with increased pressure on biodiversity, green infrastructure and open spaces through the direct and indirect effects of development, increased recreational use and greater pressure on environmental assets. However, development also presents opportunities to deliver biodiversity enhancements, biodiversity net gain and investment in green infrastructure. This is reflected in the ranking of the options, with the highest growth options performing less favourably overall.

Haringey contains an extensive biodiversity network comprising Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves, parks, open spaces and strategic ecological corridors including the Lea Valley, New River and Parkland Walk. The borough also contains areas where access to nature is more limited, particularly within eastern Haringey. The Council's SINC Review highlights the importance of protecting and enhancing these interconnected ecological resources and identifies opportunities to strengthen habitat networks and improve access to nature.

Option H1 would deliver the highest level of housing growth and is therefore considered most likely to increase pressure on biodiversity and open space resources. Whilst development would be expected to deliver biodiversity enhancements and biodiversity net gain, the substantial levels of urban intensification required may reduce opportunities for habitat creation and place greater pressure on SINCs, ecological corridors and publicly accessible green spaces. Increased population growth may also intensify recreational pressure on sensitive habitats. As a result, likely significant negative effects are identified.

Options H2 and H3 would also support a relatively high level of growth with associated pressure on biodiversity resources and open spaces. Whilst development would be expected to deliver biodiversity enhancements and comply with biodiversity net gain requirements, uncertainty remains regarding the extent to which these measures could offset cumulative pressures associated with the scale of growth proposed. Both options are identified to have neutral effects.

Overall, the assessment indicates that Options H2 and H3 may perform relatively more favourably against this objective than the higher growth alternative assessed. Whilst development would still place some pressure on biodiversity and open space resources, the lower level of growth may reduce pressure on ecological assets, strategic wildlife corridors and publicly accessible green space relative to the higher-growth alternatives. The option may also provide greater opportunity to incorporate green infrastructure, biodiversity enhancement and habitat connectivity measures alongside development.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA9: Soils and Minerals	Effect	Significant negative	Neutral	Uncertain
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with increased pressure on land resources and a greater need to identify development opportunities beyond those currently evidenced through the Council's housing land supply and capacity assessments. This is reflected in the ranking of the options, with the highest growth options performing less favourably.

Haringey is a predominantly urban borough with limited undeveloped land and relatively few opportunities for large-scale outward expansion. The majority of future development opportunities are expected to be delivered on previously developed land through placemaking, redevelopment and urban intensification. The efficient use of land is therefore an important consideration in accommodating future growth.

Option H1 would deliver the highest level of housing growth and is therefore considered most likely to increase pressure on land resources. The option requires the identification of additional development opportunities beyond those currently identified through the borough's evidence base and could result in increased pressure to optimise sites beyond levels currently anticipated. As a result, likely significant negative effects are identified.

Option H2 would align housing delivery with identified development capacity and is therefore considered most likely to promote the efficient use of land whilst reducing pressure to identify additional development opportunities. The option would continue to support placemaking and urban intensification whilst recognising the borough's physical and environmental constraints. This option is identified to have neutral effects.

Option H3 would deliver housing growth in accordance with the Draft London Plan target. Whilst growth would continue to be focused on previously developed land and placemaking opportunities, uncertainty remains regarding the relationship between the proposed level of growth and the borough's identified development capacity and there would be a greater element of development on employment land. As a result, uncertain effects are identified.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA10: Social Inclusion and Equality	Effect	Negative	Positive	Neutral
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. New housing development has the potential to contribute positively towards reducing inequalities through the provision of new homes, including affordable housing, improved access to suitable accommodation and investment in communities. However, the delivery of inclusive and cohesive communities is dependent not only on housing supply, but also on the ability of supporting infrastructure, community facilities, services and employment opportunities to grow alongside the population. This is reflected in the ranking of the options.

Haringey experiences significant social, economic and health inequalities, with pronounced differences between eastern and western parts of the borough. Housing affordability, overcrowding and housing insecurity remain key challenges, whilst access to opportunities, services, community infrastructure and environmental quality varies across the borough. Accommodating growth in a way that both addresses housing need and supports inclusive communities is therefore a key consideration.

Option H1 would deliver the highest level of housing growth and would make the strongest contribution towards meeting housing need, improving housing choice and addressing affordability pressures. The option may also support access to housing for groups currently excluded from the housing market and generate investment in services and community facilities. However, the scale of growth proposed is anticipated to significantly exceed currently identified development capacity and would place substantial pressure on employment land, infrastructure, community facilities and local services. Negative effects are identified.

Option H2 would provide a positive contribution towards reducing inequalities through housing delivery whilst aligning growth more closely with identified development capacity. The option would provide greater opportunity to balance housing provision alongside infrastructure delivery, employment growth and placemaking objectives, supporting inclusive communities and access to services. Positive effects are identified.

Option H3 would provide social benefits through delivering a significant number of homes and supporting efforts to address housing need, affordability pressures and overcrowding. The option would increase opportunities for a wider range of households to access housing and could support investment in services and infrastructure. However, uncertainty remains regarding the deliverability of the Draft London Plan housing requirement and the implications of loss of employment land which could have negative impacts on the local economy and the availability fo employment. Neutral effects are therefore identified.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed. Whilst delivering fewer homes than the higher-growth alternatives, the option would continue to contribute towards meeting housing needs whilst providing protecting employment land and the local economy and would have greater opportunity to coordinate growth with supporting infrastructure, community facilities and local services. The option may support the delivery of well-designed and inclusive neighbourhoods, reduce the risk of infrastructure capacity being exceeded and enable housing growth to be balanced with wider social, economic and environmental objectives.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3

IIA11: Historic Environment, Culture and Character	Effect	Significant negative	Neutral	Positive
	Rank	3	2	1

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with increased pressure for redevelopment, urban intensification and taller buildings, all of which have the potential to affect heritage assets, cultural infrastructure, townscape character and local distinctiveness. This is reflected in the ranking of the options, with the highest growth options performing less favourably.

Haringey's character is strongly influenced by its historic settlement pattern, distinctive neighbourhoods, conservation areas, heritage assets and varied townscapes. Haringey's Urban Character and Placemaking Study identifies the importance of preserving and enhancing local character whilst accommodating growth, noting that much of the borough is characterised by low to mid-rise development, historic high streets, Victorian and Edwardian residential areas, and distinctive landscape features including Alexandra Palace, the Northern Heights and the Lea Valley.
The borough also benefits from a rich cultural landscape, including creative industries, cultural venues, community facilities, museums, festivals and cultural organisations. The Council's Arts and Culture Strategy highlights the importance of celebrating and promoting Haringey's distinctive cultural identity, heritage and communities whilst ensuring that growth supports cultural participation, creativity and community cohesion.

Option H1 would deliver the highest level of housing growth and is therefore considered most likely to increase pressure for redevelopment and urban intensification across the borough. The option may require development opportunities beyond those currently identified through the Council's evidence base and would increase pressure for taller buildings, higher densities and redevelopment within areas of established character. Whilst growth may support investment in cultural activities and facilities, the scale of change proposed is considered likely to place significant pressure on heritage assets, historic townscapes and local distinctiveness. Likely significant negative effects are therefore identified.

Option H2 would align housing delivery more closely with identified development capacity and may therefore reduce pressure for redevelopment and intensification relative to the higher-growth alternative. However, whilst growth would be expected to be guided by design and heritage policies, uncertainty remains regarding the extent to which the level of development proposed could be accommodated without affecting the character and appearance of sensitive areas, heritage assets and locally distinctive cultural environments The option may provide greater

flexibility to accommodate growth whilst respecting local character, townscape, heritage and cultural considerations. Neutral effects are therefore identified.

Option H3 would also support a relatively high level of growth and associated redevelopment activity. The option would involve greater levels of development on industrial land than Option H2 which may provide opportunities for much need placemaking investment in the borough's existing employment areas including industrial heritage and and public realm.

Overall, the assessment indicates that Option H3 may perform relatively more favourably against this objective than the alternatives assessed. Whilst development would still result in change across the borough, the level of growth may reduce pressure for extensive redevelopment, substantial urban intensification and taller buildings relative to the higher-growth alternative. In addition, the options would direct greater investment into Haringey's employment areas which are in high need of placemaking interventions and improvements.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA12: Transport and Connectivity	Effect	Negative	Positive	Uncertain
	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8. Higher levels of growth are generally associated with increased demand for public transport, walking and cycling infrastructure, highways capacity and digital communications infrastructure. This is reflected in the ranking of the options, with the highest growth options generally placing greater pressure on existing transport networks and infrastructure.

Haringey benefits from a well-connected transport network, with strong public transport accessibility focused around strategic corridors including the High Road, Wood Green, Turnpike Lane, Seven Sisters and Tottenham Hale. However, accessibility varies across the borough and a number of areas experience congestion, severance and limited connectivity. However, there is a need to improve walkability, strengthen east-west connections and address the impacts of major transport infrastructure acting as barriers within parts of the borough.

Option H1 would deliver the highest level of housing growth and would therefore be expected to generate the greatest increase in travel demand. Whilst the option may support greater investment in public transport, active travel and digital infrastructure, and strengthen the case for

improvements to transport capacity and connectivity, it would also place increased pressure on existing transport networks. Negative effects are therefore identified.

Option H2 would align housing delivery more closely with identified development and infrastructure capacity. The option would reduce pressure on transport networks relative to the higher-growth alternative whilst directing development to the most sustainable urban areas and supporting investment in sustainable transport improvements. Positive effects are identified.

Option H3 would also support investment in transport and active travel improvements but the level of growth on employment land may be a less sustainable form of development in terms of transport capacity. Uncertain effects are identified.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed. Whilst growth would continue to generate additional travel demand, the lower level of housing growth may reduce pressure on public transport services, highways and local infrastructure relative to the higher-growth alternative. The focus of growth in urban areas served best by sustainable transport will result in a sustainable pattern of development compared to more dispersed development including on existing employment land.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA13: Waste	Effect	Uncertain	Neutral	Neutral
	Rank	3	=1	=1

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8 and, consequently, differing levels of construction activity, resource consumption and waste generation. Higher levels of growth are generally associated with increased construction and demolition waste, greater household waste arisings and additional pressure on waste management infrastructure. However, larger-scale development may also create opportunities to support investment in waste infrastructure, resource efficiency measures and circular economy initiatives.

National, regional and local policy seeks to minimise waste generation and promote a transition towards a circular economy through waste reduction, re-use, recycling and the efficient use of materials and resources. The borough is also covered by the North London Waste Plan, which identifies the need to manage future waste arisings sustainably whilst supporting population growth and development.

Option H1 would deliver the highest level of housing growth and would therefore be expected to generate the greatest quantity of construction, demolition and household waste over the plan period. The option would require substantial levels of redevelopment and urban intensification, resulting in increased resource consumption and waste arisings. Whilst the option may support investment in waste management infrastructure and circular economy initiatives, uncertainty remains regarding the extent to which these measures could offset the scale of waste generated relative to the other options.

Option H2 would align housing delivery more closely with identified development capacity and would likely reduce waste generation relative to the higher-growth alternative. The option would still provide opportunity to coordinate waste infrastructure and circular economy measures alongside development and may therefore be less likely to result in adverse effects than the higher-growth alternative. Neutral effects are identified.

Option H3 would involve a similar level of housing delivery and associated waste generation as Option H2. Whilst development would be expected to comply with waste reduction and circular economy policies and may support additional investment in resource efficiency measures, uncertainty remains regarding the extent to which waste arisings could be minimised. Neutral effects are identified.

Overall, the assessment indicates that Options H2 and H3 perform relatively more favourably against this objective than the higher-growth alternative assessed. Whilst development would still generate construction and household waste, the lower level of growth may reduce waste arisings and resource consumption relative to the higher-growth alternative.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA14: Housing	Effect	Significant positive	Positive	Positive
	Rank	1	3	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8 and therefore differ significantly in their ability to address housing need, affordability pressures and the demand for a wider range of homes. Higher levels of housing growth would provide a greater contribution towards meeting identified housing needs, increasing housing supply and supporting the delivery of affordable housing. This is reflected in the ranking of the options, with the highest-growth options performing most favourably.

Haringey continues to experience significant housing pressures, including affordability challenges, overcrowding and a substantial need for affordable housing. Increasing the supply of homes, particularly affordable homes and housing that meets a range of needs, is therefore a key objective of the Local Plan.

Option H1 would deliver the highest level of housing growth and is therefore expected to make the strongest contribution towards meeting identified housing need over the plan period. The option would maximise opportunities for new housing delivery, including affordable housing, specialist housing and housing choice. Significant positive effects are therefore identified.

Option H2 would support continued housing growth through a capacity-led approach. Whilst the option would provide opportunities for housing delivery and may align more closely with identified development capacity, the overall level of provision is significantly lower than under the needs-led alternative and a little lower than the Draft London Plan alternative. Positive effects are identified.

Option H3 would deliver housing growth in line with the Draft London Plan and would also support a substantial increase in housing supply. The option would make a strong contribution towards meeting housing needs and affordability pressures. Positive effects are identified.

Overall, the assessment indicates that Option H1 performs relatively more favourably against this objective than the alternatives assessed, as it would deliver the greatest number of homes and make the strongest contribution towards meeting identified housing needs and affordability pressures. Options H2 and H3 would continue to deliver significant numbers of homes, their contribution towards meeting housing needs would be comparatively lower due to the reduced scale of housing growth anticipated.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
	Effect	Significant negative	Positive	Negative

IIA:15: Economy and Employment	Rank	3	1	2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8 and therefore differ in the extent to which they support economic growth whilst maintaining sufficient employment land and floorspace to meet the needs of existing and future businesses. Whilst higher levels of housing delivery may support economic activity through increased population growth, labour supply and expenditure, they would increase pressure on employment land and other competing land uses. This is reflected in the ranking of the options.

The borough benefits from a diverse economy and a significant concentration of creative industries, small businesses, industrial activities and town centre uses. The borough's evidence base identifies continuing demand for employment land and floorspace, whilst recognising increasing pressure on industrial land arising from housing growth and competing land use requirements.

Option H1 would deliver the highest level of housing growth and may support economic activity through increasing the supply of labour and supporting local expenditure. However, the option would place considerable pressure on the need to release employment land for housing and could reduce flexibility to accommodate identified industrial and employment land needs. The option may therefore generate both positive and negative economic effects. On the one hand it would increase labour supply, support expenditure and potentially stimulate investment; on the other hand it would place significant pressure on employment land and reduce flexibility to accommodate identified industrial and employment needs. Significant negative effects are identified.

Option H2 would align housing growth more closely with identified development capacity and provide the greatest flexibility to balance housing delivery with employment land protection and economic objectives. The option may support continued investment and placemaking whilst reducing pressure on industrial land and supporting the long-term availability of employment sites. Positive effects are identified.

Option H3 would require industrial release not required under Option H2. It would create additional pressure on employment land relative to the Option H2 but a lower level of pressure than Option H1. Negative effects are identified.

Overall, the assessment indicates that Option H2 may perform relatively more favourably against this objective than the alternatives assessed. The option may provide greater opportunity to balance housing delivery with the protection and enhancement of employment land and economic capacity, whilst supporting continued investment and placemaking objectives.

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA16: Town Centres	Effect	Positive	Positive	Positive
	Rank	1	=2	=2

The options propose varying levels of housing delivery over the period 2028/9 to 2037/8 and therefore differ in the extent to which they may support the vitality and viability of the borough's town and local centres. Additional housing growth can increase footfall, support spending within local businesses, sustain services and contribute to the vitality of centres. However, higher levels of housing growth may also increase pressure on land availability and competing uses, reducing flexibility to accommodate employment, cultural, leisure and community activities that contribute to successful centres.

Haringey's network of metropolitan, district and local centres performs an important economic, social and cultural role. Haringey's Urban Character & Placemaking Study identifies centres such as Wood Green, Crouch End, Muswell Hill, Hornsey and Seven Sisters as distinctive places whose vitality is derived not only from housing and footfall, but from a diverse mix of retail, employment, leisure, community and cultural uses. The study repeatedly highlights the importance of maintaining this mix while accommodating growth.

The Council's Arts and Culture Strategy also recognises the contribution that cultural venues, creative industries, festivals, community facilities and independent businesses make to thriving places and town centres. The strategy seeks to strengthen cultural infrastructure, support creative enterprise and increase participation in arts and culture across the borough.

Option H1 would deliver the highest level of housing growth and therefore has the potential to generate substantial increases in footfall and spending within the borough's centres. However, the scale of growth proposed may require additional housing opportunities to be identified beyond those currently evidenced through the Council's capacity work. This could increase pressure for residential-led redevelopment or conversion of sites and premises currently accommodating employment, cultural, leisure, retail and community uses within centres, potentially undermining the diversity of activities that contribute to vitality and vibrancy. Positive effects are identified.

Option H2 may offer greater opportunity to balance housing delivery with the retention and support of employment, retail, cultural, leisure and community uses within centres. By aligning housing delivery more closely with identified development capacity, the option may support increased town-centre activity whilst providing greater flexibility to retain a diverse mix of uses. Positive effects are identified.

Option H3 would support a relatively high level of housing growth and associated increases in activity within centres. Whilst this could support investment, footfall and vitality within centres, uncertainty remains regarding the extent to which growth could be accommodated whilst maintaining the diversity of uses that contribute to successful centres. Positive effects are identified.

Option H4 would also support positive effects through continued housing growth and increased expenditure within centres.

Whilst delivering a lower level of growth than the higher-growth alternatives, it would reduce pressure on competing land uses and help support the continued provision of a diverse range of activities within centres. Significant positive effects are therefore identified.

Overall, the assessment indicates that Option H1 may perform relatively more favourably against this objective than the alternatives assessed. The higher-growth option may provide greater opportunity to increase footfall and expenditure but may also place greater pressure on the uses that contribute to the vitality, viability and distinctiveness of Haringey's centres. In contract, lower growth options H2 and H3 may better balance housing delivery with the retention and enhancement of the mix of uses that underpin successful town centres, whilst supporting additional activity and investment within centres.

Table 5.3: Summary findings for the assessment of housing growth options

IIA objective	IIA outcomes	Option H1	Option H2	Option H3
IIA1 Social Infrastructure	Effect	Significant negative	No	Uncertain
	Rank	3	1	2
IIA2 Improving Health	Effect	Negative	Positive	Positive
	Rank	3	1	2

IIA3 Education	Effect	Significant positive	Positive	Positive
	Rank	1	3	2
IIA4 Air, Light and Noise Pollution	Effect	Significant negative	Neutral	Neutral
	Rank	3	1	2
IIA5: Climate Change Mitigation	Effect	Significant negative	Neutral	Neutral
	Rank	3	1	2
IIA6: Climate Adaptation and Resilience	Effect	Significant negative	Neutral	Uncertain
	Rank	3	1	2
IIA7: Water Resources and Pollution	Effect	Negative	Neutral	Neutral
	Rank	3	=1	=1
IIA8: Biodiversity and Open Space	Effect	Significant negative	Neutral	Neutral
	Rank	3	=1	=1
IIA9: Soils and Minerals	Effect	Significant negative	Neutral	Uncertain
	Rank	3	1	2
IIA10: Social Inclusion and Equality	Effect	Negative	Positive	Neutral
	Rank	3	1	2

IIA11: Historic Environment, Culture and Character	Effect	Significant negative	Neutral	Positive
	Rank	3	2	1
IIA12: Transport and Connectivity	Effect	Negative	Positive	Uncertain
	Rank	3	1	2
IIA13: Waste	Effect	Uncertain	Neutral	Neutral
	Rank	3	=1	=1
IIA14: Housing	Effect	Significant positive	Positive	Positive
	Rank	1	3	2
IIA:15: Economy and Employment	Effect	Significant negative	Positive	Negative
	Rank	3	1	2
IIA16: Town Centres	Effect	Positive	Positive	Positive
	Rank	1	=2	=2
Summary Score	**Overall Rank**	**3**	**1**	**2**

Summary Conclusion

Whilst Option H1 would deliver the greatest number of homes and make the strongest contribution towards meeting housing need, it would also result in the greatest development pressures on infrastructure, employment land, environmental assets and the borough's placemaking objectives. Option H3 would similarly require employment land release and may exceed the level of growth indicated by the Council's identified

development capacity evidence. Option H2 would provide a capacity-led approach to housing delivery but may result in lower levels of housing provision than the higher-growth alternative.

Overall, the assessment indicates that Option H2 may perform relatively more favourably across the full range of IIA objectives than the alternatives assessed. Whilst delivering fewer homes than the higher-growth alternatives, the option may provide greater opportunity to balance housing delivery with infrastructure provision, employment land needs, environmental objectives and placemaking priorities. The option may also reduce pressure for additional development opportunities beyond those currently identified through the Council's evidence base.

5.3 Developing the Preferred Approach

The purpose of the IIA is not to identify a single "best" option against every objective, but to identify and evaluate the likely significant effects of reasonable alternatives and provide evidence to support informed decision-making. The assessment therefore considers the relative social, economic and environmental performance of alternative approaches, recognising that all options involve trade-offs between competing objectives and that the final preferred approach must be informed by a combination of assessment findings, evidence, consultation responses and planning judgement.

5.3.1 Preferred Spatial Strategy Approach

The assessment of spatial strategy options identified strengths and weaknesses associated with each alternative.

Options S2 and S3 would provide the greatest flexibility to accommodate housing growth through the release of employment land, Metropolitan Open Land and Green Belt. These options perform relatively strongly against the housing objective due to their ability to maximise development opportunities and increase housing delivery. However, they also perform less favourably against a range of environmental objectives, including biodiversity, open space, climate change, efficient use of land and protection of environmental assets. Option S3 would place the greatest pressure on infrastructure, biodiversity, heritage assets, landscape character and environmental quality.

Options S1 provides the strongest protection for designated employment land. However, these it places greater reliance on urban intensification to accommodate growth. Option S1 would require the high levels of densification and urban intensification and could necessitate development beyond the assumptions tested through the Council’s Tall Buildings Study. While the option performs particularly strongly against objectives

relating to biodiversity, open space and protection of environmental assets, it performs less favourably in relation to housing delivery and may result in increased pressure on existing infrastructure and townscape character.

Overall, the assessment concluded that Option S4 performs most favourably when considered against the full range of IIA objectives. The option accommodates growth through a focus on urban intensification with limited release of Metropolitan Open Land and Green Belt and limited co-location. The assessment indicates that this option provides the strongest balance between housing delivery, economic growth, environmental protection, infrastructure capacity and placemaking objectives. It avoids the extensive land release proposed under Options S2 and S3 whilst reducing reliance on the level of urban intensification anticipated under Option S1.

On this basis, Option S4 has been identified as the Council's preferred spatial strategy approach. The option is considered to provide the most appropriate balance between delivering growth, maintaining industrial capacity, protecting environmental assets and supporting the borough's wider placemaking ambitions.

5.3.2 Preferred Housing Growth Approach

The assessment of housing growth options identified clear differences in the extent to which each option contributes towards meeting housing needs and the wider sustainability implications associated with delivering that growth.

Option H1 would deliver the highest level of housing growth and make the strongest contribution towards meeting identified housing needs and affordability pressures. However, the option is also expected to generate the greatest pressure on infrastructure, environmental assets, employment land and the borough's ability to accommodate growth sustainably. The option may also require the identification of additional development opportunities beyond those currently evidenced through the borough's capacity assessments.

Option H3 would deliver a substantial level of housing growth in line with the Draft London Plan housing requirement. Whilst the option performs strongly against housing objectives, uncertainty remains regarding the impact of the growth given the borough's identified development capacity and the employment land release that would be involved.

Options H2 generally performs more favourably across a range of social, environmental and infrastructure-related objectives. This demonstrates greater potential to balance housing delivery alongside environmental protection, infrastructure provision, employment needs and placemaking priorities. The assessment consistently identifies this option as among the strongest performing alternative across many of the IIA objectives.

Based on the evidence currently available, Option H2 has been identified as the Council's preferred housing growth approach. The option provides continuity with the adopted London Plan 2021 whilst continuing to support the delivery of a significant number of new homes. The assessment indicates that this option provides greater opportunity to balance housing growth with environmental objectives, infrastructure capacity, employment needs and placemaking priorities. It is also anticipated to align more closely with the borough's identified development capacity than the other higher-growth alternatives.

5.3.3 Overall Conclusions

Taken together, the preferred approach combines:

- **Option S4: Urban intensification focus with limited land release/co-location** as the preferred spatial strategy approach; and
- **Option H2: London Plan 2021 and Capacity-Led Growth** as the preferred housing growth approach.

The assessment indicates that this combination provides the most appropriate balance between meeting housing needs, supporting economic growth, maintaining industrial capacity, protecting environmental assets and ensuring that growth can be supported by appropriate infrastructure and services. Whilst some alternatives perform more favourably against individual objectives, the preferred approach performs strongly across the majority of objectives and avoids many of the significant adverse effects associated with the higher-growth and greater land-release alternatives.

The preferred approach has therefore been developed having regard to the findings of the IIA alongside the wider evidence base, consultation responses, national and regional planning policy, and the Council's vision and objectives for the borough. Further assessment of the preferred spatial strategy, housing growth approach, policies and site allocations is presented in Chapter 6.

PART 2: What are the IIA findings at this stage in relation to the Proposed Submission Local Plan?

6. Assessment of the Preferred Local Plan

6.1 Introduction

This chapter presents the assessment of the Proposed Submission Local Plan and considers the likely significant social, economic and environmental effects of the Council's preferred approach. The assessment builds upon previous stages of the IIA process, including the Draft Integrated Impact Assessment published alongside the Regulation 18 Draft Local Plan consultation in 2025.

The assessment has been undertaken using the IIA Framework described in Chapter 4 and considers the extent to which the preferred Local Plan is likely to contribute towards the achievement of the sixteen IIA objectives. The assessment draws upon the baseline evidence, technical studies, consultation responses and other supporting evidence prepared to inform the Local Plan.

The purpose of this chapter is not to reassess every component of the Local Plan from first principles. Rather, it seeks to review the preferred Regulation 19 Local Plan, taking account of changes made since Regulation 18, updated evidence and the outcomes of the alternatives assessment presented in Chapter 5. Where significant changes have been made to the Plan since Regulation 18, these have been specifically considered as part of the assessment.

6.2 Changes Since the Regulation 18 Draft Local Plan

Following consultation on the Regulation 18 Draft Local Plan between October and December 2025, the Council reviewed the representations received alongside updated evidence and changes to the wider planning policy context. This process has informed the preparation of the Proposed Submission Local Plan and the accompanying Regulation 19 Integrated Impact Assessment.

The overall vision, placemaking framework and strategic objectives of the Local Plan remain broadly consistent with the approach consulted upon at Regulation 18. However, some changes have been made to reflect consultation responses, updated evidence and ongoing technical work, including updated housing capacity evidence, employment land evidence, site assessment work and preparation of the emerging Housing and Economic Land Availability Assessment (HELAA).

The most significant changes relevant to the IIA relate to:

- Refinement of the preferred spatial strategy and the assessment of reasonable alternatives.
- Refinement of housing growth options and the preferred housing growth approach.
- Amendments to policies in response to consultation responses and updated evidence.
- Updates to site allocations, including revised capacity assumptions and site-specific assessment work.
- Updates to the assessment framework, baseline information and supporting technical evidence.

Given the substantial continuity between the Regulation 18 Draft Local Plan and the Proposed Submission Local Plan, many of the conclusions reached through the earlier stages of assessment remain applicable. The focus of this chapter is therefore on assessing the preferred Regulation 19 Local Plan and considering whether updates to the evidence base, preferred approaches, policies and site allocations alter the conclusions previously identified through the IIA process.

6.3 Assessment of the Vision, Objectives and Placemaking Framework

The Local Plan vision, objectives and placemaking framework provide the overarching strategic direction for growth and development across the borough and establish the principles that underpin the wider policy framework. Together they set out the Council's aspirations for creating healthy, inclusive, sustainable and distinctive neighbourhoods whilst addressing housing need, supporting economic prosperity, tackling climate change and reducing inequalities. Detailed assessments are presented in Appendix F.3.

The assessment indicates that the vision, objectives and placemaking framework are strongly aligned with the sustainability issues identified through the review of plans and programmes, baseline evidence and stakeholder engagement process. In particular, the framework seeks to deliver growth in a manner that supports health and wellbeing, social inclusion, climate resilience, housing delivery, economic opportunity, environmental enhancement and high-quality placemaking. These priorities are closely aligned with the key challenges and opportunities identified through the IIA baseline review.

Consultation responses received during the Regulation 18 consultation demonstrated broad support for the overall direction of the vision, objectives and placemaking framework. Respondents generally supported the emphasis placed on climate action, healthier neighbourhoods,

green infrastructure, active travel, cultural identity, social infrastructure and inclusive growth. Consultees including statutory bodies, neighbouring authorities, landowners, representative groups and local organisations generally supported the strategic direction of the Plan, whilst also seeking clarification, additional supporting text or refinement of particular elements.

Whilst a number of respondents raised concerns regarding the delivery of growth, infrastructure capacity, housing affordability and the implications of development for specific neighbourhoods, these comments were generally directed towards the scale, location or implementation of growth rather than the overall vision or placemaking objectives themselves. The consultation evidence therefore suggests broad support for the strategic direction of the Plan, with debate focused primarily on how the vision should be delivered rather than whether its objectives are appropriate.

A number of amendments have been made to the vision, objectives and placemaking framework since Regulation 18 in response to consultation responses, updated evidence and ongoing policy development. These changes primarily relate to clarification of terminology, revisions to supporting text and minor amendments intended to improve clarity, consistency and effectiveness. The assessment concludes that these changes do not materially alter the strategic direction of the Plan or the sustainability performance of the framework.

Overall, the assessment indicates that the vision, objectives and placemaking framework are likely to generate predominantly positive effects across the majority of IIA objectives. Significant positive effects are anticipated in relation to health and wellbeing, social inclusion and equality, climate change mitigation and adaptation, housing, economy and employment, transport and connectivity, and heritage, culture and local character. No significant adverse effects have been identified. The extent to which these benefits are realised will depend upon the successful implementation of the spatial strategy, neighbourhood policies, borough-wide policies and site allocations.

6.4 Preferred Spatial Strategy

The preferred spatial strategy provides the overarching framework for managing growth, investment and change across the borough over the plan period. Rather than directing development solely towards a limited number of growth locations, the strategy adopts a neighbourhood placemaking approach which seeks to respond positively to the distinct characteristics, opportunities and challenges present across Haringey's neighbourhoods. The strategy establishes a place-based approach which combines housing delivery, economic growth, environmental enhancement and investment in social and physical infrastructure.

The strategy identifies a series of neighbourhood-based priorities and spatial interventions, including areas where growth and investment will be concentrated, areas where environmental, social and economic improvements will be prioritised, and areas where existing character, environmental assets and neighbourhood qualities should be protected and enhanced. Growth is therefore expected to be delivered through a combination of neighbourhood policies, placemaking priorities, site allocations and borough-wide development management policies. The neighbourhood chapters and associated place-based strategies provide the primary mechanism through which the spatial strategy will be delivered.

Following consultation on the Regulation 18 Draft Local Plan, the Council reviewed consultation responses, updated technical evidence on housing, employment, town centre needs and supply of land for such uses, and had regard to the findings of the Integrated Impact Assessment. As part of this process, the spatial strategy options were reassessed to consider how best to balance housing delivery, economic growth, environmental protection and placemaking objectives. This process resulted in Option S4 (Urban intensification focus with limIted land release/co-location) being identified as the Council's preferred spatial strategy approach for the Proposed Submission Local Plan. The Regulation 18 Draft Local Plan was broadly aligned with this approach but the approach as a whole has been further refined to maximise benefits and avoid harms, particularly in relation to designated employment land, town centre vitality and viability, and biodiversity/open space.

As set out in Chapter 5, the assessment of reasonable alternatives concluded that Option S4 performs more favourably when assessed against the full range of IIA objectives. In particular, it provides greater flexibility to accommodate housing growth and support placemaking priorities whilst continuing to support employment growth and industrial capacity. The option also avoids the more significant environmental effects associated with the higher land-release alternatives and reduces dependence on the highest levels of urban intensification to accommodate future growth. As a result, Option S3 was identified as the preferred spatial strategy because it provides a more balanced response to competing housing, employment, environmental and infrastructure objectives.

Importantly, the move from the Regulation 18 approach to the preferred Regulation 19 strategy does not represent a fundamental change in the overall direction of the Local Plan. Both approaches retain a strong emphasis on neighbourhood placemaking, sustainable development, environmental enhancement, active travel, infrastructure delivery and the protection of the borough's distinctive character. The principal difference relates to the degree of flexibility provided for accommodating growth and responding to competing land-use pressures.
The assessment indicates that the preferred spatial strategy is likely to generate significant positive effects in relation to health and wellbeing, social inclusion and equality, housing delivery, economy and employment, town centres, transport and connectivity, and climate change

mitigation and adaptation. These benefits arise from the strategy's focus on creating healthy and inclusive neighbourhoods, improving access to services and opportunities, supporting sustainable travel, strengthening local centres and directing growth towards accessible and sustainable locations.

The strategy is also expected to contribute positively towards reducing inequalities across the borough through a combination of housing delivery, environmental improvements, public realm enhancements, investment in social infrastructure and support for local economic growth. The emphasis on neighbourhood-specific placemaking priorities provides opportunities to respond to local circumstances whilst maintaining a coherent borough-wide approach.

Consultation responses on the Regulation 18 Draft Local Plan demonstrated broad support for the overall direction of the spatial strategy. Respondents frequently supported the objectives of creating healthier neighbourhoods, improving environmental quality, strengthening local centres, supporting sustainable travel and investing in public spaces. Many respondents also supported the principle of a neighbourhood-based approach which recognises the differing circumstances across the borough. Whilst concerns were expressed regarding infrastructure capacity, the distribution of growth and the potential impacts of development in specific locations, these concerns generally related to the implementation of the strategy and individual site allocations rather than the overall strategic approach.

A number of refinements have subsequently been made to the spatial strategy in response to consultation feedback and updated evidence. These changes primarily relate to updates to supporting text, revisions to mapping, clarification of terminology and amendments that strengthen the relationship between the spatial strategy, placemaking priorities and neighbourhood policies. The assessment concludes that these changes do not materially alter the sustainability performance of the strategy and generally strengthen its effectiveness and clarity.

Potential adverse effects remain associated with accommodating growth, particularly where development intensification may increase pressure on local infrastructure, biodiversity, open spaces, environmental quality, heritage assets or local character. Consultation responses also highlighted concerns regarding housing density, infrastructure capacity, transport impacts and the cumulative effects of development in some neighbourhoods. However, the strategy seeks to manage these pressures through neighbourhood-specific placemaking priorities, infrastructure planning, environmental protections and the wider policy framework. The significance of any adverse effects will depend on the detailed form, location and phasing of development and the successful implementation of mitigation and enhancement measures.

Overall, the preferred spatial strategy performs positively against the majority of IIA objectives and is considered capable of delivering sustainable development across the borough. By combining housing delivery, economic growth, environmental protection and neighbourhood placemaking priorities, the strategy provides an appropriate framework for implementing the Local Plan vision and objectives and supporting the creation of healthy, inclusive and resilient neighbourhoods across Haringey.

6.5 Borough-wide Policies

The borough-wide policies establish the overarching requirements that development proposals will be expected to satisfy throughout the borough. They provide the principal framework for managing the quality, design, sustainability and impacts of development and are intended to ensure that the growth directed through the spatial strategy, neighbourhood policies and site allocations is delivered in a coordinated and sustainable manner. Detailed assessments of individual policies are presented in Appendix F.2.

Consultation undertaken on the Regulation 18 Draft Local Plan generated a significant number of comments relating to the borough-wide policy framework. In most cases, consultees supported the overall policy direction whilst seeking clarification, additional flexibility, stronger supporting text or amendments to policy wording. Subsequent amendments have generally refined and strengthened the policy framework rather than altering its overall direction.

The assessment indicates that the borough-wide policies are expected to generate predominantly positive effects across the full range of IIA objectives. In particular, significant positive effects are anticipated in relation to:

- health and wellbeing;
- social inclusion and equality;
- climate change mitigation and adaptation;
- biodiversity and green infrastructure;
- transport and connectivity;
- housing quality;
- economy and employment; and
- the protection of heritage, culture and local character.

A number of policy themes perform particularly strongly across multiple objectives.

The design policies are expected to generate significant positive effects through their support for high-quality placemaking, inclusive design, healthy environments, climate resilience and protection of local character. These policies contribute positively to health, equality, transport, climate change, heritage and housing objectives simultaneously.

The climate change, resilience and environmental policies have been strengthened following consultation responses from organisations including the Environment Agency, Thames Water and NHS stakeholders. Amendments relating to flood risk, sustainable drainage, wastewater infrastructure, water efficiency and climate resilience are expected to improve the effectiveness of the policy framework and generate positive effects for climate adaptation, water resources, health and environmental quality.

Similarly, the green and blue infrastructure policies have been refined following consultation with Natural England, the Environment Agency, the Lee Valley Regional Park Authority, the Woodland Trust and local environmental organisations. These changes strengthen support for biodiversity, green infrastructure, watercourse restoration, tree protection, urban greening and open space provision and are expected to reinforce positive effects relating to biodiversity, climate resilience and health and wellbeing.

The social infrastructure policies have also been amended to respond to comments from healthcare providers, community organisations and statutory consultees. These changes strengthen support for social infrastructure delivery, community facilities and health provision and are expected to enhance positive effects relating to health, social inclusion and equality.

Consultation responses on employment and economy policies generally supported the continued protection of employment land and the promotion of affordable workspace, whilst raising questions regarding flexibility and future employment needs. The policy framework has subsequently been refined to improve consistency with regional policy and latest emerging evidence. Overall, the assessment concludes that the policies are likely to generate significant positive effects for economic growth, employment opportunities and industrial capacity whilst supporting wider regeneration objectives.

Similarly, consultation responses relating to town centres, sustainable travel and cultural infrastructure resulted in a number of amendments intended to strengthen policy effectiveness, accessibility and implementation. These updates are generally expected to reinforce positive effects relating to sustainable travel, active travel, cultural activity, town centre vitality and community wellbeing.

Whilst some policy themes inevitably involve tensions between competing objectives, particularly in balancing growth, environmental protection and infrastructure demands, the assessment identifies no significant adverse effects arising from the borough-wide policy framework as a whole. Potential adverse effects are generally mitigated through policy safeguards, development management requirements and supporting evidence.

Overall, the Regulation 19 borough-wide policy framework performs positively against the majority of IIA objectives and is expected to make a substantial contribution towards delivering sustainable development across the borough. The amendments made since Regulation 18 strengthen and clarify the policy approach but do not materially alter the overall conclusions reached through the previous assessment.

6.6 Neighbourhood Policies

The neighbourhood policies provide the primary mechanism through which the spatial strategy and placemaking framework are delivered at the local level. They translate the borough-wide vision and strategic objectives into place-specific priorities and reflect the distinct characteristics, opportunities and challenges of Haringey's neighbourhoods. Together, the neighbourhood policies establish a locally responsive framework for managing growth, investment and change across the borough's diverse communities. Detailed assessments of individual policies are provided in Appendix F.3.

The assessment indicates that the neighbourhood policy framework is likely to generate predominantly positive effects across the majority of IIA objectives. The policies support the delivery of housing, employment, environmental enhancement, improved connectivity, social infrastructure and healthier neighbourhoods whilst ensuring that development responds appropriately to local character and context.

The neighbourhood policies perform particularly strongly against objectives relating to health and wellbeing, social inclusion and equality, housing, economy and employment, town centres, transport and connectivity, heritage, culture and local character. The policies also contribute positively towards climate change mitigation and adaptation by promoting sustainable patterns of development, supporting active travel and encouraging environmental improvements as part of neighbourhood change.

A key strength of the neighbourhood policy framework is its place-based approach. By recognising the differing roles and characteristics of neighbourhoods across the borough, the policies provide opportunities to respond to local needs whilst supporting the wider objectives of the

Local Plan. This approach is expected to contribute positively towards reducing inequalities, improving access to services and opportunities, strengthening local centres and supporting high-quality placemaking.

Consultation responses received during the Regulation 18 consultation frequently related to neighbourhood-specific issues, reflecting the importance of local context in shaping perceptions of growth and change. Whilst responses often raised concerns regarding the scale and location of development, infrastructure provision, accessibility, heritage impacts and the implications of particular site allocations, these concerns generally focused on how growth should be managed within individual neighbourhoods rather than the principle of adopting a place-based approach. Many respondents supported investment in local centres, improvements to public realm, environmental enhancement, cultural assets and improved connections between neighbourhoods.

A number of amendments have been made to neighbourhood policies since Regulation 18 in response to consultation feedback, updated evidence and ongoing policy development. These changes include refinements to policy wording and supporting text, clarification of place-specific priorities and updates informed by emerging evidence. The changes are generally intended to improve clarity, strengthen policy effectiveness and respond to locally specific concerns rather than alter the overall direction of the neighbourhood strategies.

Potential adverse effects associated with the neighbourhood policies are primarily linked to the accommodation of growth within existing urban areas and may include pressure on local infrastructure, transport networks, environmental assets, heritage assets and local character. However, the assessment indicates that these effects are generally localised and can be reduced through the wider policy framework, site-specific requirements, infrastructure planning and mitigation measures. The neighbourhood policies themselves play an important role in identifying local sensitivities and guiding development to ensure that it responds appropriately to the characteristics of each area.

Overall, the neighbourhood policy framework is expected to make a significant positive contribution towards the delivery of the Local Plan vision and spatial strategy. By providing a locally distinctive approach to growth and placemaking, the policies help ensure that development is responsive to local circumstances whilst contributing towards the achievement of wider environmental, social and economic objectives. The assessment concludes that the neighbourhood policies perform positively against the majority of IIA objectives and are expected to support the creation of healthy, inclusive, sustainable and distinctive neighbourhoods across Haringey.

6.7 Site Allocations

Site allocations represent the principal locations through which the Local Plan will deliver new homes, employment floorspace, community infrastructure, environmental improvements and wider placemaking objectives over the plan period. The allocations vary considerably in scale, character and proposed land uses, reflecting the diverse role that different sites will play in delivering the spatial strategy. Detailed assessments of individual site allocations are presented in Appendix F.

The assessment indicates that the site allocations are likely to generate significant positive effects in relation to housing delivery, economy and employment, town centres, transport and connectivity, and health and wellbeing. Collectively, the allocations provide opportunities to accommodate growth in accessible locations, support investment in neighbourhoods, improve access to services and facilities, and contribute towards the delivery of the Local Plan's housing and economic objectives. Many allocations are located within established urban areas where residents can access public transport, employment opportunities, community facilities and local centres without reliance on private vehicles.

The site allocations also play an important role in delivering the neighbourhood placemaking objectives set out throughout the Plan. In addition to providing new homes and employment opportunities, many allocations have the potential to improve public realm, strengthen local centres, enhance connectivity, deliver environmental enhancements and support the provision of social infrastructure. As a result, the assessment identifies positive effects across a broad range of social, economic and environmental objectives.

Consultation on the Regulation 18 Draft Local Plan generated significant interest in a number of individual site allocations. Whilst consultation responses generally supported the principle of directing growth to sustainable locations, concerns were raised regarding the appropriateness of some allocations, the scale of development proposed, potential infrastructure pressures, impacts on local character, environmental considerations and site-specific constraints. A number of objections were concentrated on particular sites rather than the overall allocation strategy, and in several instances concerns reflected differing interpretations of site capacity, development assumptions or the intended role of the allocation within the wider spatial strategy.

Since Regulation 18, the Council has reviewed consultation responses alongside updated technical evidence, capacity information and ongoing site assessment work. A small number of site allocations have been removed from the plan and, where appropriate, amendments have been made for the majority of remaining allocations to site boundaries, site capacities, development principles, supporting text and allocation

requirements. Additional evidence, including updated housing capacity work and revised site-specific information, has also informed the preparation of the Regulation 19 Local Plan. Consequently, the assessment of site allocations has been updated to reflect the most recent evidence available.

Whilst site allocations generate many positive effects, they also represent the component of the Local Plan where potential adverse effects are most likely to arise. Depending on their location and characteristics, some allocations have the potential to give rise to adverse effects relating to biodiversity, open space, heritage assets, townscape character, environmental quality, water resources, transport capacity or pressure on existing infrastructure. The nature and significance of these effects varies considerably between sites and reflects local circumstances and site-specific constraints.

The assessment indicates that most identified adverse effects are capable of being avoided, reduced or mitigated through the application of borough-wide policies, neighbourhood policies, site-specific requirements and development management processes. Many allocations include specific mitigation measures or development principles intended to address issues such as design quality, heritage sensitivity, biodiversity enhancement, environmental protection, accessibility, infrastructure provision and climate resilience.

Overall, the site allocations are expected to make a substantial contribution to the delivery of the Local Plan vision, spatial strategy and neighbourhood placemaking priorities. Whilst some site-specific adverse effects have been identified, the assessment concludes that these are generally capable of being managed through the policy framework and are outweighed by the wider benefits associated with housing delivery, economic growth, investment in neighbourhoods and the creation of healthier, more sustainable places. The assessment therefore concludes that the site allocation framework performs positively against the majority of IIA objectives and is expected to support the delivery of sustainable development across the borough.

6.8 Summary of Effects

The assessment indicates that the Proposed Submission Local Plan is expected to generate predominantly positive social, economic and environmental effects across the borough. The Plan provides a comprehensive framework for accommodating growth whilst seeking to improve health and wellbeing, reduce inequalities, support economic prosperity, respond to the climate emergency and protect and enhance Haringey's environmental, cultural and heritage assets.

The assessment identifies significant positive effects in relation to:

- Health and wellbeing;
- Social inclusion and equality;
- Housing delivery and housing quality;
- Economy and employment;
- Climate change mitigation and adaptation;
- Transport and connectivity; and
- Town centres and local centres.

These positive effects arise primarily from the Plan's neighbourhood placemaking approach, delivery of new homes, support for economic growth and employment, investment in social infrastructure, promotion of active and sustainable travel, protection and enhancement of green infrastructure, and measures to improve environmental quality and climate resilience. The integrated nature of the policy framework means that many policies contribute positively across several IIA objectives simultaneously. For example, policies relating to design, climate resilience, biodiversity, active travel and social infrastructure are expected to deliver a range of interconnected environmental, social and health benefits.

The assessment indicates that the overall strategic direction of the Local Plan remains broadly consistent with that consulted upon at Regulation 18. Whilst a number of amendments have been made in response to consultation responses, updated evidence and ongoing policy development, these changes primarily comprise refinements intended to improve clarity, effectiveness and deliverability. Consequently, the sustainability effects identified through the Regulation 18 IIA remain broadly applicable, and the Regulation 19 Plan is expected to perform positively against the majority of IIA objectives.

The assessment also identifies a number of potential adverse effects associated with accommodating growth. These principally relate to the potential for pressure on infrastructure, biodiversity, open space, heritage assets, environmental quality and local character. At the site-specific level, some allocations also have the potential to generate localised adverse effects depending on their scale, location and surrounding context. However, the assessment concludes that the majority of these effects are capable of being avoided, reduced or mitigated through the borough-wide policies, neighbourhood policies, site-specific requirements and development management processes contained within the Local Plan.

The preferred spatial strategy, together with the borough-wide policies, neighbourhood policies and site allocations, is expected to support the delivery of sustainable development by balancing housing delivery, economic growth, environmental protection and neighbourhood placemaking objectives. The assessment indicates that the Plan provides a robust framework for managing future growth whilst responding to the challenges identified through the baseline evidence and supporting the achievement of the Council's vision for the borough.

Overall, the IIA concludes that the Proposed Submission Local Plan is likely to make a positive contribution towards the achievement of sustainable development and performs favourably against the majority of IIA objectives. Whilst some adverse effects and areas of uncertainty remain, particularly in relation to the detailed implementation of individual sites and the cumulative effects of growth, these are generally outweighed by the significant positive effects anticipated across the social, economic and environmental objectives of the assessment. Ongoing monitoring and review will be important to ensure that the Plan continues to deliver the anticipated benefits and that any unforeseen adverse effects are identified and addressed through future plan implementation and monitoring arrangements.

7. Key Findings and Cumulative Effects

7.1 Cumulative, Synergistic and Secondary Effects of the Local Plan

The IIA has considered the cumulative, synergistic and secondary effects arising from the combined implementation of the Local Plan. Whilst individual policies and site allocations may generate relatively modest effects when considered in isolation, the combined effects of multiple policies, growth locations and development proposals may be more significant.

This section focuses on the effects arising from the implementation of the Local Plan itself (intra-plan effects). Potential cumulative effects arising in combination with neighbouring plans, programmes and major growth proposals outside the borough are considered separately in Section 8.2.

Cumulative Effects

The assessment identifies a number of significant cumulative positive effects arising from the interaction of the Local Plan's spatial strategy, borough-wide policies, neighbourhood policies and site allocations.

The most significant cumulative positive effects are anticipated in relation to:

- Housing delivery and housing quality.

- Health and wellbeing.
- Social inclusion and equality.
- Economy and employment.
- Sustainable transport and connectivity.
- Climate change mitigation and adaptation.
- Town centre vitality and local economic activity.

These effects arise from the combined influence of housing, employment, transport, social infrastructure, healthy placemaking, climate resilience, biodiversity and town centre policies, together with the proposed site allocations.

In particular:

- The combined effect of housing policies, affordable housing policies and site allocations is expected to support increased housing delivery, improved housing quality and greater housing choice across the borough.
- The interaction of healthy placemaking, social infrastructure, active travel and green infrastructure policies is expected to generate cumulative benefits for physical and mental health and wellbeing.
- The combined effect of employment, industrial land, town centre and transport policies is expected to support economic growth, improve access to employment opportunities and strengthen the vitality and resilience of town and local centres.
- The interaction of biodiversity, urban greening, climate resilience, sustainable drainage and environmental protection policies is expected to strengthen environmental quality, climate adaptation and ecological connectivity across the borough.
- The combined effect of housing, social infrastructure, equality and accessibility policies is expected to contribute positively towards reducing inequalities and improving access to opportunities, services and facilities.

The assessment therefore concludes that the most substantial cumulative effects arising from implementation of the Local Plan are likely to be positive and reinforce the achievement of the Plan's wider social, economic and environmental objectives.

Synergistic Effects

A number of positive synergistic effects have been identified where the combined effect of multiple policies is greater than the sum of their individual effects.

For example:

- Housing, social infrastructure, healthy placemaking and sustainable travel policies collectively contribute towards improved health outcomes and reduced health inequalities.
- Affordable housing, employment, skills and town centre policies combine to support social mobility, economic inclusion and reduced deprivation.
- Green and blue infrastructure, climate resilience and healthy streets policies collectively contribute towards improved environmental quality, climate adaptation and public health.
- Inclusive design, accessible transport, community infrastructure and housing policies work together to improve accessibility and participation for older people, disabled people and other groups who may experience barriers to accessing opportunities.

The assessment concludes that many of the Local Plan's strongest positive effects arise through these interrelationships between policy themes rather than from individual policies acting alone.

Secondary Effects

A range of secondary effects have also been identified.

Positive secondary effects include:

- Increased physical activity resulting from investment in active travel infrastructure.
- Improved mental wellbeing associated with access to high-quality housing, green infrastructure and community facilities.
- Economic benefits arising from improved accessibility, skills development and town centre investment.
- Climate and environmental benefits associated with reduced car dependency and improved energy efficiency.

Potential negative secondary effects may arise from the wider consequences of growth, including:

- Increased demand for social infrastructure, healthcare facilities and education provision.
- Increased pressure on transport networks and public services.
- Additional pressure on environmental assets and open spaces.
- Increased demand for water resources and utility infrastructure.

However, the Local Plan includes a broad range of policies relating to infrastructure delivery, environmental protection, climate resilience, social infrastructure and sustainable transport that are expected to reduce the significance of these effects.

Overall, the assessment concludes that the cumulative, synergistic and secondary effects arising from implementation of the Local Plan are predominantly positive. Whilst some cumulative adverse effects may arise as a consequence of housing and employment growth, particularly in relation to infrastructure capacity and environmental resources, these effects are expected to be managed through the policy framework of the Plan, supporting infrastructure investment, project-level assessment and ongoing monitoring. Collectively, the Local Plan's policies and site allocations are expected to work together to support the delivery of sustainable development, healthier communities, improved environmental quality and inclusive economic growth across Haringey.

7.2 Key Findings from the Health Impact Assessment

The HIA considers the likely effects of the Local Plan on health and wellbeing and has been undertaken using seven health priorities reflecting the wider determinants of health. These comprise: Healthy and Inclusive Communities; Access to Health, Care and Community Services; Healthy Homes; Healthy Environment and Climate Resilience; Access to Nature, Open Space and Physical Activity; Healthy Streets, Mobility and Accessibility; and Healthy Economy and Food Environment.

Overall, the Health Impact Assessment concludes that the Local Plan is likely to have a **significant positive effect on health and wellbeing** across the borough. The strongest positive effects arise from:

- Delivery of high-quality and affordable housing.
- Improved access to healthcare, community facilities and social infrastructure.
- Enhanced opportunities for walking, wheeling and cycling.
- Improvements to environmental quality and climate resilience.
- Increased access to green and blue infrastructure.
- Support for healthier town centres and local food environments.
- Improved access to employment, education and training opportunities.

The assessment also concludes that the Local Plan is likely to contribute positively towards reducing health inequalities. In particular, benefits are expected for:

- Children and young people.
- Older people.
- Disabled people.
- Ethnic minority communities.
- Residents experiencing socioeconomic disadvantage.
- Communities experiencing poorer health outcomes and environmental inequalities.

Particularly strong positive health outcomes are associated with the housing, social infrastructure, sustainable travel, green and blue infrastructure, climate resilience and neighbourhood placemaking policies. Collectively, these policies address many of the wider determinants of health and are expected to improve both physical and mental wellbeing.

Potential adverse effects relate primarily to the pressure that growth may place on healthcare infrastructure, social infrastructure, transport networks and environmental resources. Temporary adverse effects may also arise during construction and redevelopment phases. However, these risks are generally recognised within the Local Plan and are expected to be mitigated through infrastructure delivery, environmental safeguards and development management processes.

Overall, the HIA concludes that the Local Plan is likely to make a significant positive contribution towards improving health outcomes and creating healthier, more resilient and more inclusive communities across Haringey.

7.3 Key Findings from the Equality Impact Assessment

The EqIA considers the likely effects of the Local Plan on people with protected characteristics under the Equality Act 2010, together with people experiencing socioeconomic disadvantage as a specific Haringey consideration. The assessment considers the implications of the Plan for age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation, alongside Haringey's local commitment to considering socioeconomic inequalities.

Overall, the EqIA concludes that the Local Plan is likely to have a **significant positive effect on equality outcomes** and is expected to make a positive contribution towards advancing equality of opportunity, reducing inequalities and fostering more inclusive communities.

The strongest positive equality outcomes are associated with:

- Affordable housing and housing quality improvements.
- Accessible and adaptable homes.
- Social infrastructure provision.
- Inclusive design.
- Sustainable transport and accessibility improvements.
- Employment and skills opportunities.
- Improved access to community facilities, public spaces and cultural infrastructure.

The groups expected to benefit most significantly include:

- Residents experiencing socioeconomic disadvantage.
- Disabled people.
- Older people.
- Ethnic minority communities.
- Women and girls.
- Children and young people.
- Gypsy and Traveller communities.
- Households experiencing housing need.

The assessment identifies particularly strong positive equality outcomes within the Housing, Social Infrastructure, Sustainable Travel, Employment and Industry, Green and Blue Infrastructure and Design chapters of the Local Plan. The neighbourhood strategies for North Tottenham, Tottenham Hale and Wood Green are also expected to generate substantial positive equality outcomes through directing investment, housing, employment opportunities and infrastructure towards areas experiencing higher levels of deprivation and need.

The principal equality risks identified relate to:

- Housing affordability pressures.

- Potential displacement of existing residents and businesses.
- Commercial and residential value increases associated with investment and development.
- Temporary disruption associated with redevelopment and construction activity.

However, these risks are recognised throughout the Plan and are expected to be mitigated through affordable housing requirements, affordable workspace provision, social infrastructure policies, inclusive design standards and ongoing monitoring.

Overall, the EqIA concludes that the Local Plan is expected to have predominantly positive effects for protected groups and is likely to make a significant contribution towards reducing inequalities, advancing equality of opportunity and supporting the creation of fairer and more inclusive neighbourhoods across Haringey.

7.4 Key Findings from the HRA

A Habitats Regulations Assessment has been undertaken separately from the IIA process. The findings are reported in a standalone HRA report.

PART 3: What happens next?

8. Conclusions and Next Steps

8.1 Overall Findings

The IIA has considered the likely environmental, social, economic, health and equality effects of the Proposed Submission Local Plan. The assessment indicates that the Plan is expected to make a positive contribution towards achieving sustainable development in Haringey by supporting the delivery of new homes, employment opportunities, infrastructure improvements, climate action, enhanced environmental quality and healthier neighbourhoods. The assessment has also informed the development of the Plan through the consideration of reasonable alternatives and the refinement of policies and site allocations throughout the plan-making process.

Significant positive effects are anticipated in relation to housing delivery, health and wellbeing, social inclusion and equality, economy and employment, and town centres. The Plan is expected to support the delivery of new homes, including affordable housing and specialist

accommodation, helping to address housing need, overcrowding and affordability pressures. Significant positive effects are also anticipated through the Plan's housing policies, employment land policies, town centre policies, infrastructure policies and healthy placemaking policies, which support the protection and enhancement of employment land, support for town centres, delivery of community infrastructure, promotion of healthy placemaking, improvements to sustainable and active travel networks, and measures to reduce inequalities between different communities and parts of the borough. The findings of the HIA and EqIA indicate that the Plan is likely to support improved health outcomes, enhanced accessibility and greater equality of opportunity for a range of population groups, including those with protected characteristics and people experiencing socio-economic disadvantage.

Minor positive effects are identified in relation to climate change mitigation, climate resilience, water resources, biodiversity and open space, heritage, townscape and landscape quality, waste management and transport connectivity. The Plan includes a comprehensive framework of policies which support net zero and climate resilience objectives, sustainable design and construction, biodiversity net gain, urban greening, sustainable drainage, protection and enhancement of heritage assets, sustainable movement and circular economy principles. Whilst the strategic nature of the Local Plan means that many benefits will ultimately depend on the detailed design and implementation of development proposals, the policy framework is expected to contribute positively to environmental quality and long-term sustainability objectives.

Minor negative effects are likely to arise from the scale of growth proposed through the Plan, despite the positive effects identified. In particular, additional housing and employment development associated with site allocations, housing growth and town centre intensification has the potential to increase pressure on transport networks, utilities infrastructure, healthcare provision, education facilities, open spaces, biodiversity assets and water resources. Construction activity and population growth may also result in localised adverse effects relating to air quality, noise, traffic movements and resource consumption. However, the assessment concludes that these effects are generally capable of being managed through the policy framework of the Plan, including policies relating to sustainable transport, green infrastructure, environmental protection, climate resilience and infrastructure delivery, together with supporting infrastructure investment, project-level environmental assessment and the implementation of mitigation measures.

Neutral effects are identified for a number of policies against specific IIA objectives where the scope of the policy is not expected to influence the objective being assessed. For example, policies relating to employment land and economic growth were frequently assessed as neutral against objectives relating to heritage assets or water resources, whilst policies focussed on design, heritage and character were often assessed as neutral in relation to employment generation. In addition, several borough-wide policies were assessed as having negligible effects against

objectives outside their primary area of influence. In these instances, implementation of the Plan is unlikely to materially alter baseline conditions either positively or negatively.

Uncertainty remains regarding the nature and significance of some effects, as with all strategic assessments. This reflects the strategic nature of the Local Plan, the long-term timescales associated with its implementation, and the fact that many effects will depend on the detailed design, timing and delivery of development proposals. Uncertainty is particularly associated with future housing delivery rates, the timing of infrastructure provision, market conditions, funding availability, cross-boundary development proposals and the implementation of strategic transport improvements. There is also uncertainty regarding the precise magnitude of cumulative effects arising from growth within Haringey and neighbouring boroughs over the plan period.

Nevertheless, the assessment concludes that the Proposed Submission Local Plan provides an appropriate framework for managing growth whilst avoiding, minimising and mitigating adverse effects and supporting positive environmental, social and economic outcomes. Ongoing monitoring will play an important role in identifying any unforeseen effects and informing future plan reviews where necessary.

8.2 Cross-Boundary Cumulative effects

Cumulative effects can result from the combined impacts of a plan with impacts of another plan, or the ‘inter-plan’ effects. These can affect the same receptor, resulting in in-combination or synergistic effects. The Proposed Submission Local Plan therefore has the potential to combine with other planned or on-going activities in the vicinity of the borough to result in cumulative effects.

Whilst the geographic scope of the Proposed Submission Local Plan only addresses the area covered by Haringey, the in-combination effects of new development proposed through the plans for the Local Planning Authorities adjoining or in close proximity to the borough have the potential to lead to cumulative effects. This includes relating to adopted or emerging Local Plan documents for:

- Barnet;
- Enfield;
- Waltham Forest;
- Hackney;

- Islington; and
- Camden

In addition, whilst the Proposed Submission Local Plan is being prepared to be in conformity with the published London Plan (2021), the London Plan takes forward a range of proposals in the wider area which have the potential to lead to cumulative effects. Other plans in London, including the Mayor of London's Transport Strategy, also have the potential to take forward proposals which may lead to cumulative effects.

Furthermore, the combination of Proposed Submission Local Plan proposals and other proposals and activities being taken forward in the wider area has the potential to lead to cumulative effects. Proposals associated with Opportunity Areas (OAs) in the wider area which are adjacent to the borough boundary with Haringey, are located within shared transport corridors (West Anglia Main Line, Piccadilly Line, Victoria Line, Great Northern corridor, A10, A406), or are expected to deliver substantial housing or employment growth, are likely to lead to cumulative impacts.

Examples include:

Lee Valley Opportunity Area (Waltham Forest/Enfield)
- Extends through parts of Enfield, Waltham Forest and Haringey.
- Significant logistics, industrial and residential growth potential.
- Potential cumulative effects on the Lee Valley corridor, biodiversity assets, flood risk management and transport infrastructure.

Upper Lea Valley growth locations (non-OA sites within Waltham Forest)
- Although not separately designated as an OA, substantial redevelopment is occurring around Blackhorse Road and adjacent Lea Valley locations.
- Potential cumulative effects on transport, housing provision and ecological networks shared with Haringey.

Meridian Water (Enfield)
- Major mixed-use growth location in the Upper Lee Valley, with significant planned housing, employment and infrastructure delivery.
- Potential cumulative effects on transport networks, healthcare and education infrastructure, utilities, biodiversity, open space provision and the wider Lee Valley corridor.

Joyce and Snell's (Enfield)

- Significant housing-led redevelopment area in Edmonton, located close to Haringey's eastern boundary.
- Potential cumulative effects on housing delivery, social infrastructure, local transport networks and community facilities serving residents in both boroughs.

New Southgate Opportunity Area (Barnet/Enfield)

- Strategic growth area adjoining Haringey's northern boundary, with planned residential and town centre development.
- Potential cumulative effects on transport infrastructure, housing delivery, public services, open space and local environmental quality.

Blackhorse Lane (Waltham Forest)

- Major regeneration and intensification area within the wider Upper Lea Valley growth corridor.
- Potential cumulative effects on housing and employment growth, transport capacity, air quality, utilities infrastructure and ecological networks shared with Haringey.

Woodberry Down (Hackney)

- Large-scale residential-led redevelopment area located adjacent to Haringey's southern boundary.
- Potential cumulative effects on public transport demand, healthcare provision, open space, community infrastructure and local housing markets.

Stamford Hill Area Action Plan (Hackney)

- Comprehensive planning framework supporting growth and investment in an area directly adjoining Haringey.
- Potential cumulative effects on public transport capacity, town centre functions, public realm, air quality and demand for social infrastructure.

Finsbury Park (Haringey/Islington/Hackney)

- Major Metropolitan Centre and cross-boundary growth location shared between Haringey, Islington and Hackney.
- Potential cumulative effects on public transport capacity, town centre functions, public realm, air quality and demand for social infrastructure.

- Opportunities for positive cumulative effects through coordinated investment in connectivity, public space and local services.

Strategic transport investment across London, including improvements to the London Overground network, enhancements to National Rail services, and longer-term proposals such as Crossrail 2, may also interact cumulatively with growth planned in Haringey by influencing travel patterns, accessibility, housing markets and employment locations.

In this context, potential effects (both positive and negative) which may occur as a result of the in-combination effects of the Proposed Submission Local Plan and other plans and proposals in the area include the following:

- Increased pressure on transport networks arising from the combined effects of planned growth in Haringey and neighbouring boroughs, with the potential for associated impacts on congestion, air quality, noise and the quality of the public realm.

- Cumulative impacts on ecological assets networks, including from the combined effects of new development and associated infrastructure on habitats, biodiversity corridors and green and blue infrastructure assets, particularly the Epping Forest Special Area of Conservation

- Positive effects for biodiversity and climate resilience through enhancements to green and blue infrastructure delivered through the London Plan (2021), the Proposed Submission Local Plan, neighbouring local plans and wider environmental improvement initiatives. These measures have the potential to strengthen local and sub-regional ecological networks and improve access to nature.

- Changes in employment land demand and employment distribution arising from the combined effects of growth planned in Haringey and major neighbouring growth areas, including Opportunity Areas and other strategic development locations.

- Increased demand for social and physical infrastructure, including healthcare, education, community facilities, utilities and open space, arising from the cumulative effects of planned housing and employment growth across North and North-East London.

- Potential cumulative impacts on water resources, wastewater infrastructure and water quality associated with population growth and development across catchments shared with neighbouring authorities.

- Potential cumulative impacts relating to surface water and fluvial flood risk from the combined effects of new development. However, national policy requirements and the mitigation measures secured through relevant plans and development management processes are expected to reduce the significance of adverse effects.

- Positive cumulative effects arising from improvements to public transport, walking and cycling infrastructure, supporting increased accessibility, reduced reliance on private vehicles and enhanced connectivity between Haringey and neighbouring boroughs.

- Positive cumulative effects associated with increased housing delivery, employment opportunities and investment across the sub-region, contributing to wider economic growth and improved access to homes, jobs and services.

8.3 Recommendations

As highlighted above, for many potential cumulative effects, the policy approaches proposed by the Proposed Submission Local Plan will help reduce the significance of in-combination impacts. However, monitoring will be a key means of ensuring that any unforeseen environmental, social and economic effects are identified and that appropriate remedial action can be considered where significant adverse effects arise.

At this stage, no specific recommendations are considered necessary. The assessment indicates that the Proposed Submission Local Plan provides an appropriate framework for avoiding, managing and mitigating adverse effects whilst supporting positive environmental, social and economic outcomes.

Nevertheless, there remains a need for ongoing monitoring to ensure that development is delivered in accordance with the objectives and policy framework of the Plan, and to identify any unforeseen effects arising from implementation, either alone or in combination with other plans, programmes and projects in the wider area. Monitoring will also help inform any future reviews of the Local Plan and associated implementation measures where required.

8.4 Consultation on the Regulation 19 Proposed Submission Local Plan

The Proposed Submission Local Plan, together with this IIA Report and supporting evidence base documents, will be published for consultation in accordance with the requirements of the Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).

The Regulation 19 consultation will provide an opportunity for statutory consultees, key stakeholders, infrastructure providers, neighbouring authorities and local communities to comment on the legal compliance, soundness and effectiveness of the Proposed Submission Local Plan and the findings of the IIA. Representations received during the consultation period will be considered by the Council prior to submission of the Plan for independent examination.

8.5 Submission and Examination

Following consideration of representations received during the Regulation 19 consultation, the Proposed Submission Local Plan and supporting documents, including the IIA Report, will be submitted to the Secretary of State for independent examination.

The purpose of the examination will be to determine whether the Plan has been prepared in accordance with legal and procedural requirements, including relevant environmental assessment requirements, and whether it is sound. The appointed Planning Inspector will consider evidence submitted by the Council and representations made by interested parties before issuing conclusions and recommendations. Any main modifications identified through the examination process will be subject to consultation and, where necessary, further sustainability appraisal and integrated impact assessment.

8.6 Monitoring

Following adoption of the Local Plan, the Council will monitor the implementation and effects of the Plan through its monitoring framework and Authority Monitoring Report (AMR). Monitoring will help identify whether the objectives of the Plan are being achieved and whether any unforeseen environmental, social or economic effects arise from implementation of the Plan, either alone or in combination with other plans, programmes and projects in the wider area. Monitoring will also provide an evidence base to inform future reviews of the Local Plan and the development of any necessary mitigation, management or policy responses.

As highlighted above, for many potential cumulative effects, the policy approaches proposed by the Proposed Submission Local Plan will help reduce the significance of in-combination impacts. However, monitoring will be a key means of ensuring that any unforeseen environmental, social and economic effects are identified and that appropriate remedial action can be considered where significant adverse effects arise.
At this stage, no specific recommendations are considered necessary. The assessment indicates that the Proposed Submission Local Plan provides an appropriate framework for avoiding, managing and mitigating adverse effects whilst supporting positive environmental, social and economic outcomes. Nevertheless, ongoing monitoring will be important to ensure that development is delivered in accordance with the objectives and policy framework of the Plan and to identify any unforeseen effects arising during implementation.