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

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the Strategic Policies Partial Review. The purpose of the Strategic Policies document is to set out the long term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council’s strategy for achieving that vision. In particular, it identifies the broad locations for delivering housing and other types of development.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including ‘equalities’ and ‘health’ issues¹), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the Strategic Policies Review is a legal requirement.²

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.³
- 2.1.2 In-line with the Regulations, a report (which we call **the SA Report**) must be published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **the SA Report must answer the following four questions:**
1. What’s the scope of the SA?
 - The scope must be established subsequent to a review of the sustainability context and baseline, and consultation with designated agencies.
 2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point ‘reasonable alternatives’ are appraised.
 3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?

3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a complete draft plan. Rather, the Council is consulting on an early draft plan. This Interim SA Report is produced with the intention of informing the consultation and subsequent preparation of the draft (‘proposed submission’) version of the plan.

Structure of this Interim SA Report

- 3.1.2 Despite this being an ‘Interim’ SA Report (i.e. a document that does not need to provide the information legally required of the SA Report) it is nonetheless helpful to structure this report according to the four questions listed above.

¹ As part of this SA process, explicit consideration is being given to ‘equalities’ and ‘health’ issues, and as such this SA process can be said to be integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). More on the SA scope – i.e. the scope of issues that are a focus of SA – is explained in ‘Part 1’ of this Report.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that Local Planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012).

³ Directive 2001/42/EC

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the ‘scope’ of the SA. In particular, and as required by the Regulations⁴, this Part of the SA Report answers the following questions.

- What’s the Plan seeking to achieve?
- What’s the sustainability ‘context’?
- What’s the sustainability ‘baseline’?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 21 broad sustainability topics:

	Broad sustainability topics	
Social	<ul style="list-style-type: none"> • Crime • Education • Health 	<ul style="list-style-type: none"> • Housing • Community Cohesion • Accessibility
Economic	<ul style="list-style-type: none"> • Economic Growth • Skills and Training 	<ul style="list-style-type: none"> • Economic Inclusion • Town Centres
Environmental	<ul style="list-style-type: none"> • Biodiversity • Townscape and Cultural Heritage • Open Space • Water Resources • Soil and Land Quality • Flood Risk and Climate Change 	<ul style="list-style-type: none"> • Air Quality • Noise • Energy and Carbon • Waste Management • Sustainable Transport

4.2 Consultation on the scope

4.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the [SA] Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans”*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁵

4.2.2 As such, an SA Scoping Report was published for consultation in January 2012. In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council’s consultation database. Subsequent to consultation the SA scope was updated.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

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

4.3 A note on ‘equalities’ and ‘health’ considerations

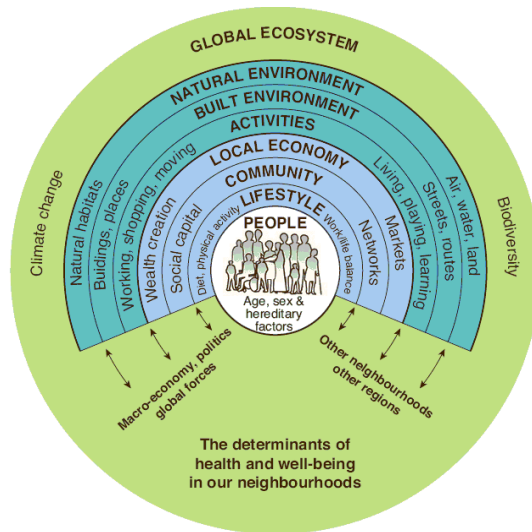
4.3.1 Equality and health considerations (‘issues’) were a focus of scoping work undertaken in late 2013 (when preparing the Scoping Report for consultation) and have also been given further consideration when updating / supplementing the SA scope in 2014 (subsequent to the Scoping Report consultation).

4.3.2 As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence **the SA process ‘integrates’ Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).**

Box 4.1: EqIA and HIA

The Council is not required to undertake **EqIA**, but does have a duty to give "due regard" to promoting equality of opportunity for all protected groups when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected groups’ are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

With regards to **HIA**, this are no requirements on the Council, although the NPPF requires planners to promote healthy communities and use evidence to assess health and wellbeing needs; and additionally, the GLA and the Mayor are required to ‘have regard to health’ in preparing strategies at the London-scale. It is important to understand that HIA is to a large extent about giving consideration to the wider *determinants of health*, including those related to the quality of the natural and built environment, people’s daily activities and lifestyles, and local communities and the economy.



Barton & Grant (2006)

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

5.1.1 Haringey's Strategic Policies document was adopted by the Council in March 2013. The purpose of the document is to set out the long term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's strategy for achieving that vision. In particular, it identifies the broad locations for delivering housing and other strategic development needs such as employment, retail, leisure, community facilities and other uses. It also sets the context for the other policy documents that make up the Haringey Local Plan, including:

- The Site Allocations DPD;
- The Development Management Policies DPD;
- The Tottenham Area Action Plan; and
- The Wood Green Area Action Plan

5.1.2 Since the Strategic Policies were adopted there have been a number of changes in the overarching planning framework, including at the national and regional level, which affect planning locally. As such, the Council is now seeking to review the Strategic Policies document.

5.1.3 Changes that have led to a need for a review include:

- The 2011 Census, which set out higher than previously projected population growth figures London, prompting the Mayor of London to prepared the Draft Further Alterations to the London Plan (FALP) that significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum – an 83% increase;
- Changes to permitted development rights, which give greater scope for the permitted change of use of offices and shops to go to residential development, as well as provision for larger residential extensions;
- Changes to the National Planning Practice Guidance (NPPG), most recently to clarify that development contributions for affordable housing should not be sought from developments of 10-units or less, putting it at odds with Haringey's Local Plan Strategic Policy SP2(7), which requires residential schemes for 1-9 units to provide 20% affordable housing;
- The introduction of both a Mayoral and Haringey Community Infrastructure Levy (CIL), which changed the way in which new development contributed financially or in kind towards the provision of strategic and local infrastructure required to support sustainable communities;
- The preparation of further key local evidence base studies, including an Open Spaces study, an Urban Characterisation Study, and a Strategic Housing Market Assessment, as well as updates to existing studies on Employment Land, Development Viability and the pan-London wide Strategic Housing Land Availability. These new and updated studies reflect the current state of the environment with respect to the local economy and demands for various land uses, which has changed significantly since the recession when the bulk of studies to inform the Strategic Policies were undertaken; and
- The new Housing Zone designation to be applied to Tottenham, which will see significant public and private investment committed to the area to unlock its development potential

and accelerate housing delivery, prompting the Council to prepare a comprehensive regeneration framework for the area along with a dedicated Area Action Plan.

- 5.1.4 In light of these changes, the Council has identified a number of alterations, vast majority of which are factual updates, which need to be made to the Strategic Policies to bring them up to date and ensure they remain consistent with the national and regional planning position.

Why is the Council only proposing a partial review of the Strategic Policies?

- 5.1.5 The Haringey Strategic Policies have already been subject to significant public scrutiny in their preparation, including an independent examination in public, following which they were found to be sound and in general conformity with both national policy and the London Plan. There have been no changes to national planning policy since the Strategic Policies were adopted (only to its supporting guidance), and the alterations to the London Plan were limited to address the implications of London’s population growth on housing needs, and therefore did not alter the regional spatial strategy for how London is to manage its growth and development over the next 20 years. The vast bulk of Haringey’s Strategic Policies document therefore remains consistent with both the national and regional policies, and there is no need therefore for these to be revisited at this early stage in the Plan’s implementation.

- 5.1.6 Further, the intention behind having a suite of local plan documents, rather than just one plan, was to enable each to be review independently and updated as necessary either in whole or in part.

- 5.1.7 In the context of the updates required, in this instance the Council has determined that a partial review is appropriate. The Council is content that, while Haringey’s strategic housing target has been significantly increased, such growth can be accommodated in accordance with the current spatial strategy for the Borough.

5.2 What’s the plan not seeking to achieve?

- 5.2.1 The Strategic Policies are an aid to delivery of the housing and employment targets for Haringey set out in London Plan, and are therefore not able to change the overall level of growth required.

- 5.2.2 Equally, the Strategic Policies document is not seeking to allocate the sites to be developed over the plan period or to set out detailed development management policies. The plan is strategic in nature in that it omits consideration of these issues in the knowledge that they can be addressed in the Site Allocations and Development Management Policies documents.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 This chapter introduces key sustainability context messages in relation to broad problems/issues and objectives. The source of context messages includes:

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), which constitutes the Government's view of what sustainable development in England means in practice for the planning system;
- Other Government reports; and
- Reports prepared by other (e.g. third sector) organisations.

6.1.2 Presented below is an updated summary of the context review presented in the Scoping Report (2012).

6.2 Social

Crime

- The NPPF calls on planning authorities to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life. It notes that measures to design out crime should be integral.
- The 'Haringey Community Safety Strategy 2013-2017' notes that following the riots in 2011, it was recommended that the Borough strengthen efforts to seek investment in economic growth, jobs, high quality housing and improved engagement with the communities affected.

Education

- The NPPF notes that providing a 'sufficient choice of school places is of 'great importance' and there is a need on the part of planning authorities to take a 'proactive, positive and collaborative approach' towards achieving this.
- According to the London Plan, the Mayor will support the provision of education facilities in order to meet the demand generated by London's growth.

Health

- The NPPF calls for the setting strategic policies to ensure the provision of health facilities. In terms of the wider determinants of health, it notes that access to high quality open spaces and sport and recreation can make an important contribution.
- The 'Marmot Review' concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked'. The 'Haringey Health and Wellbeing Strategy 2012-2015' endorses the findings of the Marmot review in terms of the need to 'ensure social justice, health and sustainability are at the heart of all policies'.
- The report 'Ready for Ageing?' warns that society is underprepared for the ageing population. Meanwhile, the study 'Under the Weather' finds that heat related illness is

liable to increase under climate change, but that this could be addressed through appropriate urban planning.

- At a local level, Haringey Council recently published for consultation a draft Corporate Plan, 'Building a Stronger Haringey Together'. One of the draft priorities is: "Empower all adults to live healthy, long and fulfilling lives."

Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible, including where housing market areas cross administrative boundaries. The NPPF also notes that:
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - Good design is a key aspect in sustainable development.
 - Authorities should ensure provision of affordable housing
 - Larger developments are sometimes the best means of achieving new homes.
- Each of London's Boroughs are required to fulfil the housing targets as set out in the London Plan, and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality.
- 'Haringey's Housing Strategy 2009-19' sets out Haringey's approach to housing over the next ten years. It includes a vision to create 'neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations'. In October 2014, the Council published for public consultation a new Housing Strategy 2015-2020.

Community cohesion

- The NPPF states that a planning principle is to support strategies to improve health, social and cultural wellbeing for all. There is a need to facilitate social interaction and promote the retention and development of community services and facilities.
- The report Natural Solutions notes that green spaces potentially have a role to play in increasing community cohesion by providing a neutral space for meeting and interacting.
- In the Haringey 'Sustainable Community Strategy 2007-2016' an ambition is set out to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.

Accessibility

- The NPPF notes that the planning system has a role to play in providing accessible local services that reflect community needs and support health, social and cultural well-being.
- The London Plan states that development should provide and improve access to social and community infrastructure. Inclusive design should also be adopted to take into account the needs of older and disabled people.
- The Haringey 'Sustainable Community Strategy 2007-2016' looks to ensure that the Borough's communities have easier access to open spaces, facilities and shopping areas.

6.3 Economic

Economic growth

- The European Union strategy for achieving economic growth up until 2020 focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth.

- According to the NPPF, the planning system can contribute to a responsive economy by ensuring sufficient land of the right type is available in the right places and at the right time; and by identifying and coordinating development requirements. It emphasises the need to:
 - Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
 - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- The Mayor's Economic Development Strategy sets an ambition for London to be the world capital of business, and to have the most competitive business environment in the world.
- The Haringey Regeneration Strategy sets out a key priority to develop a 21st century business economy that offers opportunities for sustainable employment and enterprise, to help make Haringey a place people want to work, visit and invest in.

Skills and training

- The Haringey 'Sustainable Community Strategy 2007-2016' sets an objective to extend training opportunities for people to improve their skills, especially in order to have access to jobs in key areas of commerce and growth.
- The Haringey Regeneration Strategy sets out a key priority to unlock the potential of Haringey residents through increasing skill levels and raising employment so that they can contribute to and benefit from being part of one of the most successful cities in the world.

Economic inclusion

- The London Plan notes that there is a need to tackle persistent poverty and deprivation through a policy framework that helps tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need.
- The Local Growth White Paper notes that growth should be broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings.
- The Haringey 'Sustainable Community Strategy 2007-2016' sets an ambition to target poverty through targeted social inclusion initiatives.

Town centres

- The NPPF emphasises the need to support competitive town centres, and oppose schemes that will impact town centre viability. It calls for town centres to provide a diverse retail offer and to reflect local 'individuality'.
- CLG's (2012) report 'High streets at the heart of our communities' notes that local policies should look to reinforce local distinctiveness and community value of town centres, and develop their social function with a view to underpinning ongoing commercial viability.
- The London Plan calls for the scale of new retail, commercial, culture and leisure developments within town centres to reflect the size, role and function of that centre.

6.4

Environmental

Biodiversity

- The NPPF emphasises the need to protect important sites, plan for green infrastructure and plan for ecological networks whilst taking account the anticipated effects of climate change. National policy reflects the EU Biodiversity Strategy's commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- The Natural Environment White Paper sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and well-being. It signals a move towards protecting biodiversity throughout the landscape.

- The London Plan states calls for priority to be given to achieving Biodiversity Action Plans (BAP) targets and supporting sites within or near to areas deficient in accessible wildlife sites. The Haringey BAP notes that there is a need to consider biodiversity as a cross cutting agenda to be integrated into the delivery of all services.

Townscape and cultural heritage

- The NPPF calls for a 'positive strategy' towards the 'conservation and enjoyment of the historic environment', including assets most at risk. Heritage assets should be recognised as an 'irreplaceable resource' to be conserved in a 'manner appropriate to their significance'.
- The London Plan calls for Local Authorities to maintain and enhance the contribution of the cities 'built, landscaped and buried heritage' to London's environment, culture, and economy.
- English Heritage's 'Heritage at Risk National Strategy' targets the removal of a quarter of nationally designated heritage at risk assets by April 2015. Meanwhile, 'Seeing history in the view' provides a means of understanding views that are recognised as important.

Open space

- The NPPF recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.
- The London Plan states that boroughs should plan for green infrastructure needs to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.
- Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments.

Water resources

- The EU Water Framework Directive drives a catchment-based approach to water management. An Environment Agency strategy implements Directive in relation to groundwater, highlighting that groundwater is at risk from point source and diffuse pollution.
- The NPPF calls for planning authorities to produce strategic policies to deliver the infrastructure necessary for water supply and wastewater and to take account of the effects of climate change in the long term, including on water supply.
- The 'Water White Paper' notes that through measures to encourage and incentivise water efficiency (and demand management measures by water companies), the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- An Environment Agency strategy for restoring rivers in North London considers how rivers play a role in urban regeneration, providing a range of social and environmental benefits.

Soil and land quality

- The NPPF recognises the need to protect and enhance soils; prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil pollution or land instability; and remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.

- The NPPF also highlights the need to encourage the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value.
- The 'Safeguarding our Soils' strategy highlights the vital role soils play in supporting ecosystems, facilitating drainage and providing urban green spaces for communities.

Flood risk and climate change

- The EU's 'Blueprint to Safeguard Europe's Water Resources' promotes the use of green infrastructure, such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts.
- The NPPF notes that development should be directed away from areas at highest risk from flooding. Where development is necessary, it should be made safe without increasing risk elsewhere. New developments should be planned to avoid vulnerability to climate change.
- The 'Flood and Water Management Act' calls for the incorporation of greater resilience measures into new buildings, retro-fitting at risk properties, and utilising the environment to address risk (e.g. harnessing wetlands to store water). 'Planning for SuDS' calls for greater recognition of the multiple benefits this form of water management can provide.

Air quality

- The EU Thematic Strategy on Air Pollution aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).
- According to the NPPF, plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas. New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.
- The Mayor's Air Quality Strategy notes that air pollution harms the environment and health, with greater impacts felt most severely by vulnerable people, such as children and the elderly. The London Plan seeks to ensure that development is at least 'air quality neutral'.

Noise

- The NPPF states that planning policies should aim to avoid noise that gives rise to significant adverse impacts on health and quality of life.
- The Mayor's Ambient Noise Strategy focuses on reducing noise through better management of transport systems, better town planning, and better design of buildings.

Energy and carbon

- On energy, the European Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008⁶. Plan-making should, for example, support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment
- The London Plan seeks to reduce London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. Haringey Council has set an ambitious target to reduce borough-wide carbon emissions by 40% by 2020 from a 2005 baseline.

⁶ In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.

Waste management

- The Mayor's municipal waste management strategy aims provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste, including minimising its impact on the environment and unlocking its economic value.
- The seven north London boroughs are preparing a joint Waste Plan. This plan will identify a range of suitable sites for waste management uses, to meet London Plan waste apportionments, and include policies and guidelines for determining planning applications.

Sustainable transport

- The NPPF states that the transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport). To minimise journey lengths planning policies should aim for 'a balance of land uses', and where practical, key facilities should be located within walking distance or be well served by public transport.
- Haringey encourages 'sustainable' forms of transport through measures including the Haringey Walking Plan, Cycling Action Plan and Haringey Cycle Route Network.

7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The SA Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan';
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Once the baseline has been established it can be used as a 'benchmark' against which to assess effects.

7.1.2 Presented below is an updated summary of the baseline review presented in the Scoping Report (2012).

7.2 Social

Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the Borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is above the London average (8.6%), but below the national level (9.3%). This is most acute in Tottenham Hale, with 22.45% of residents aged 16 and over having no qualifications.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.

Health

- Health and well-being in Haringey is very similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further.
- Health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the Borough. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.

- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese.

Housing

- Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The Borough has notable levels of homelessness, with 3000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the Borough (which is more densely populated than the west).
- At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London.
- The 2011 Census shows that the Borough; population was recorded as 254,926. This presents a significant change from the 2001 Census. The Borough has population density of 86.2 persons per hectare; well above the London average (52.0). The Borough's population is set to increase by 31,234 over the period 2011-2021.

Community Cohesion

- The 2011 Census showed that Haringey's population increased by 38,390 from 216,510 in 2001 to 254,900 in March 2011 (an 18% increase).
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. Nearly half the population comes from ethnic minority backgrounds.
- The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey.
- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 13th most deprived local authority in England. There are particular pockets of deprivation such as in Tottenham Northumberland Park, Wood Green and Hornsey. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England.

Accessibility

- Education is highly accessible, with 100% of 5 to 10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and 100% of 16-19 year olds within 30 minutes of further education.

7.3 Economic

Economic growth

- When it is compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. The level of employment declined by 7.1% between 2008-10 almost double the London and National averages.
- Low wages act as a barrier to home ownership and limit residents' housing options. Worklessness, isolation and low income have adverse effects upon resident's health and well-being. Employment growth is below the London average.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 or less people. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. Business stakeholders have expressed concern about the range of business premises available in the borough.

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles⁷ (55.4%) across Haringey were higher than the London average (54.6) and significantly above the percentage for Great Britain of 44.5%. The percentage of the Borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The Borough is characterised by its polarised skills base. Around 21% of the Borough's working age population has a level 1 or below qualification. Meanwhile, 40% have a level 4 or above qualification.

Economic inclusion

- The total number of economically active in 2011 was 65.5% with 6.1% unemployed. This compares reasonably favourably with London, where 66.5% were economically active in 2011, with 8.4% unemployed.
- Tottenham has some of the highest levels of unemployment in London and the UK. In 2011, 63.7% of people aged 16-64 in Tottenham were in employment, below both the London and England rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64). This is significantly above the England and London rates.

Town centres

- Haringey has a range of town centres providing shopping and services and local employment. The Wood Green Metropolitan Town Centre is the highest ranking shopping centre in the Borough with 106,000 square metres of floorspace.
- It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the Borough to fulfil their role and function

⁷ Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

- Haringey's town centre vacancy rates have increased in recent years but overall, they remain lower than national and regional averages. However, the borough's town centres are not performing equally in this respect.
- Crouch End and Green Lanes have the highest percentages of vacant town centre floor space, with 8.7% and 6.9% respectively. Wood Green (3.3%) is the best performing.

7.4

Environmental

Biodiversity

- Three European Sites are within a 10 km radius of Haringey – Lee Valley Ramsar Site, Lee Valley Special Protection Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- The Borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance. Of these, five are of Metropolitan Importance, 22 of Borough Importance Grade I and Borough Grade II and 33 of Local Importance. Haringey also has five Local Nature Reserves (LNRs) - Alexandra Palace & Park, Coldfall Wood, Parkland Walk, Railway Fields and Queens Wood. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced.
- The Lee Valley Regional Park straddles the eastern boundary of the Borough. This area is home to European designated sites and is a Site of Special Scientific Interest.
- Natural England suggests a ratio of 1 hectare of Local Nature Reserve for every 1000 of population. Haringey currently has 0.6 hectares per 1000 residents.

Townscape and cultural heritage

- The Boroughs historic assets include 467 listed buildings of Special Architectural or Historic Interest, six Grade I buildings and 434 Grade II buildings, 1150 locally listed Buildings of Merit, 29 Conservation Areas, two Registered Parks and Gardens, 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. All cultural heritage features should be conserved.
- Haringey has a number of adopted Conservation Area Character Appraisals⁸ that define the special architectural and historic interest of each of the 29 Conservation Areas and include a number of proposals that aim to protect and enhance the Conservation Areas.
- English Heritage identifies Finsbury Park and Alexandra Park in their Register of Parks and Gardens of Special Historic Interest in England. Whilst preserving statutory sites, it is important to ensure that the wider historic landscape is also protected and enhanced and that cultural heritage issues are addressed by new development.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace. This is up from 17 buildings in 2008.
- In Haringey, the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Viewing Corridor.

Open space

- The Lee Valley presents a significant recreational waterway, which could serve to link Haringey with developments in East London most notably the Olympic Park. The Lee Valley Regional Park is Haringey's single area of designated Green Belt and should continue to be protected. Efforts to encourage access for all to the River Lee must be supported, with a view to enabling health and educational excursions for residents and visitors.

⁸ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

- Haringey has a network of Metropolitan Open Land and Significant Local Open Land. Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked.
- The All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- There is a need to improve accessibility to and quality of open spaces; explore opportunities for accessible open spaces within new development and the opportunities to link open spaces; and improve smaller open spaces and green areas.
- The Borough has an overall provision of 1.7 ha of open space per 1,000 of population. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward.

Water resources

- Haringey is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment. The modification of rivers including in-stream structures and culverts has led to loss of habitat diversity and the creation of barriers for fish migration.
- The Moselle Brook and Stonebridge Brook is heavily modified and opportunities to deculvert and improve the ecological value of the brook should be taken. These Brooks are both tributaries of the Lower Lee River, classified as 'poor' ecological status and failing to meet 'good ecological potential' under the Water Framework Directive.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- The Borough is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.
- The GLA⁹ estimate that buildings cover 24,000 hectares or 16 per cent of Greater London. Crude calculations of the potential for green roofs in four areas of central London suggest that out of a surface area of 10 million m², 3.2 million m² had the potential to be greened. This would give a potential energy saving of 19,200 MWh per year or the equivalent of 8,256 CO₂e tonnes, and a capacity to store in the region of 80,000m³ of rainwater at roof level, the equivalent to, approximately, the volume of water needed for 35 Olympic swimming pools.
- Haringey-specific data is not available for water consumption however at the London level¹⁰ the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

Soil and land quality

- A variety of industrial land uses have left behind substantial contamination in the borough, which may need to be remediated before development. The Borough's Contaminated Land Strategy identified potentially contaminated sites in the borough.

⁹ GLA (2008) Living Roofs and Walls Technical Report: Supporting London Plan Policy [online] available at: <http://www.london.gov.uk/sites/default/files/living-roofs.pdf> (accessed 10/14)

¹⁰ Environment Agency (2013) State of the Environment Report for London [online] available at: <http://data.london.gov.uk/documents/SOE-2011-report.pdf> (accessed 10/14)

- Brownfield sites should be prioritised and sites which offer the greatest capacity for development. Previously developed land (PDL) within Haringey accounts for approximately for 3% of London's total PDL area.
- The Greater London Authority had identified 29 PDL sites in Haringey, which cover 84.9ha of land. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL. In 2011/12, 100% of housing was built on PDL.

Flood risk and climate change

- According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced. There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences would be significant.
- Climate change effects increase the severity and frequency of the flood risk. The extent and frequency of surface water flooding would be increased across the borough. The standard of protection from river flooding is also reduced by climate change effects in some parts of the borough adjacent to the River Lea.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the Borough. Tottenham Hale is the most vulnerable ward, with more than 50% lying within Flood Zone 2.

Air quality

- The Borough suffers poor air quality primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park.
- There are no sites listed as producing emissions to air, although the Edmonton Solid Waste Incinerator is located just beyond the Borough's northeast boundary.

Noise

- There is no suitable baseline data available for this SA topic, however anecdotally concentrations of noise exist along transport corridors in the Borough.

Energy and carbon

- The Borough has adopted a target of reducing its CO₂ emissions by 40% In line with the London Plan energy hierarchy. The population of Haringey is expected to increase during the plan period to 2050. If this growth occurs emissions are expected to increase.
- Haringey Annual Carbon Report explains the current situation in relation to a range of energy/carbon issues. A headline message is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%. This is consistent with London wide and national trends; London wide emissions have increased by 8% and UK emissions by 5.3%.
- It is also noted that in 2013 Haringey Council led a successful application to the Department of Energy and Climate Change for 'Green Deal Communities' funding, to deliver a programme that will reduce energy costs for households and businesses in Haringey, encourage eco-retrofit and drive sustainable economic growth.

Waste management

- The total amount of Municipal Solid Waste collected by Haringey in 2011 was 115,793 tonnes. 29% of the total was sent to landfill or 33,578 tonnes. Haringey has an overall capacity for waste management of approximately 104,800 tonnes per annum.
- The Borough achieves good recycling rates. There are two Reuse & Recycling Centres and these accept an increasing range of materials and items for reuse or recycling. Other

waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the Borough. The overall recycling and composting rate for the North London Waste Authority, including Haringey is 24%.

Sustainable transport

- Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes.
- Over half of Haringey households do not own a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car.
- Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider Borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital.
- Stronger orbital public transport capacity is required to serve key development areas and town centres. There is also a need for improved connectivity to key employment areas outside of the borough including Stratford, Brent Cross and Stansted Airport.

8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

The SA Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal.

8.1.1 Drawing on the review of the sustainability context and baseline, the Scoping Report (2012) was able to identify a list of key sustainability issues that should be a focus of SA. This list was then refined further into a concise list of key sustainability objectives for the Review of the Strategy Policies. These objectives (and the associated criteria) provide a methodological ‘framework’ for SA.

8.2 Sustainability objectives (the ‘SA framework’)

8.2.1 As discussed above, a key outcome of scoping work is a list of sustainability objectives that can be drawn upon as a methodological ‘framework’ for SA, i.e. can be used to guide the appraisal of significant effects on the baseline.

Table 8.1: The SA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Social		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> • Encourage safety by design? • Reduce levels of crime? • Reduce the fear of crime? • Reduce levels of antisocial behaviour?
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education for all members of society? • Improve the provision of and access to education and training facilities? • Ensure educational facilities are accessible to residential areas? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> • Improve access to health and social care services? • Prolong life expectancy and improve well-being? • Promote a network of quality, accessible open spaces? • Promote healthy lifestyles? • Provide good quality outdoor sports facilities and sites?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> • Reduce homelessness? • Increase the availability of affordable housing? • Improve the condition of Local Authority housing stock? • Improve the diversity of the housing stock? • Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character? • Create balanced communities of different affordable housing types, densities and tenures? • Create integrated, mixed-use tenure developments?
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> • Promote a sense of cultural identity, belonging and well-being? • Develop opportunities for community involvement? • Support strong relationships between people from different backgrounds and communities?
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> • Improve access to cultural and leisure facilities? • Maintain and improve access to essential services (banking, health, education) facilities?
Economic		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> • Retain existing local employment and create local employment opportunities? • Diversify employment opportunities? • Meet the needs of different sectors of the economy? • To facilitate new land and business development?
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> • Improve lifelong learning opportunities and work related training? • Reduce high levels of unemployment and worklessness? • Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> • Improve physical accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> • Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity at designated and non-designated sites? • Link and enhance habitats and wildlife corridors? • Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> • Promote townscape character and quality? • Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> • Promote a network of quality, accessible open spaces? • Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> • Preserve ground and surface water quality? • Conserve water resources? • Incorporate measures to reduce water consumption?
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> • Encourage the development and remediation of brownfield land? • Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> • Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> • Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> • Minimise the impact of the ambient noise environment?
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> • Minimise the use of energy? • Increase energy efficiency and support affordable warmth initiatives? • Increase the use of renewable energy? • Mitigate against the urban heat island effect? • Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> • Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? • Encourage the re-use of goods? • Reduce the production of waste? • Support the use of sustainable materials and construction methods? • Increase the proportion of waste recycling and composting across all sectors?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> • Improve the amenity and connectivity of walking and cycling routes? • Promote the use of public transport? • Reduce the use of the private car? • Encourage development in growth areas and town centres and reduce commuting?

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

9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

This part of the Report is yet to be completed.

Once complete, this part of the report will explain how preparation of the draft plan has been informed by appraisal of alternatives for a range of policy areas / issues (to include the overarching spatial strategy).

Specifically, for each issue / set of alternatives the following questions will be answered -

- What are the reasons for focusing appraisal on this issue / set of alternatives?
- What are the appraisal findings (in relation to the set of alternatives in question)?
- What are the Council's reasons for selecting the preferred approach in-light of the appraisal findings?

10 TBC

PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

11 INTRODUCTION (TO PART 3)

The report must include...

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

This part of the Report is yet to be completed.

Once complete, this part of the report will present an appraisal of the draft plan (i.e. the draft Partial Review).

For each of the 21 sustainability topics (see the Introduction to Part 1, above), the appraisal will identify and evaluate the 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability issues and objectives identified through scoping (see Part 1) as a methodological framework. Recommendations will be made, which can be taken into account subsequent to the consultation (alongside consultation responses) when preparing the proposed submission version of the plan.

12 TBC

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

13

23 INTRODUCTION (TO PART 4)

The report must include...

- Measures envisaged concerning monitoring.

Publication

23.1.1 Subsequent to the current consultation it is the Council's intention to prepare the final draft ('proposed submission') version of the plan for publication. This will be the version which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, representations made through the current consultation and also alternatives appraisal work.

23.1.2 **The SA Report** (as opposed to an *Interim SA Report*) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the Regulations. Table 23.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 23.1: Information contained within this Interim SA Report and the forthcoming SA Report

Part / SA Question	This Interim SA Report	The SA Report
Part 1: What's the scope of the SA?	<ul style="list-style-type: none"> • The Scope of the SA; summarised as appropriate. 	
Part 2: What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of appraisal. • Alternatives appraisal findings. • Reasons for having selected the preferred (proposed submission) approach in light of alternatives appraisal. 	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of interim appraisal. • Interim appraisal findings. <ul style="list-style-type: none"> • i.e. alternatives appraisal findings and appraisal findings from Part 3 of this report. • Reasons for having selected the preferred (proposed submission) approach in light of interim appraisal.
Part 3: What are the SA findings at this stage?	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan. 	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan.
Part 4: What are the next steps?	<ul style="list-style-type: none"> • A general discussion of what happens next. 	<ul style="list-style-type: none"> • A discussion of what happens next; and 'measures envisaged concerning monitoring'

Submission / adoption

- 23.1.3 Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other sources of evidence) before determining whether the plan is sound (or requires further modifications).
- 23.1.4 Once found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	January 2014	Interim SA Report published alongside the draft version of the Development Management Policies DPD	Anthony Whitaker, Assistant Planner Charlotte Simpson, Assistant Planner James Salmon, Graduate Planner	Mark Fessey, Principal Consultant	Steve Smith, Technical Director

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

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Development Management Policies DPD. Once adopted, the DPD will set out the detailed development management policies for the Borough; building on the adopted Strategic Policies DPD.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including ‘equalities’ and ‘health’ issues¹), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the AAP is a legal requirement.²

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.³
- 2.1.2 In-line with the Regulations, a report (which we call **the SA Report**) must be published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **the SA Report must answer the following four questions:**
1. What’s the scope of the SA?
 - The scope must be established subsequent to a review of the sustainability context and baseline, and consultation with designated agencies.
 2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point ‘reasonable alternatives’ are appraised.
 3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?

3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a complete draft plan. Rather, the Council is consulting on an early draft plan. This Interim SA Report is produced with the intention of informing the consultation and subsequent preparation of the draft (‘proposed submission’) version of the plan.

Structure of this Interim SA Report

- 3.1.2 Despite this being an ‘Interim’ SA Report (i.e. a document that does not need to provide the information legally required of the SA Report) it is nonetheless helpful to structure this report according to the four questions listed above.

¹ As part of this SA process, explicit consideration is being given to ‘equalities’ and ‘health’ issues, and as such this SA process can be said to be integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). More on the SA scope – i.e. the scope of issues that are a focus of SA – is explained in ‘Part 1’ of this Report.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that Local Planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012).

³ Directive 2001/42/EC

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the ‘scope’ of the SA. In particular, and as required by the Regulations⁴, this Part of the SA Report answers the following questions.

- What’s the Plan seeking to achieve?
- What’s the sustainability ‘context’?
- What’s the sustainability ‘baseline’?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 21 broad sustainability topics:

	Broad sustainability topics	
Social	<ul style="list-style-type: none"> • Crime • Education • Health 	<ul style="list-style-type: none"> • Housing • Community Cohesion • Accessibility
Economic	<ul style="list-style-type: none"> • Economic Growth • Skills and Training 	<ul style="list-style-type: none"> • Economic Inclusion • Town Centres
Environmental	<ul style="list-style-type: none"> • Biodiversity • Townscape and Cultural Heritage • Open Space • Water Resources • Soil and Land Quality • Flood Risk and Climate Change 	<ul style="list-style-type: none"> • Air Quality • Noise • Energy and Carbon • Waste Management • Sustainable Transport

4.2 Consultation on the scope

4.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the [SA] Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans”*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁵

4.2.2 As such, an SA Scoping Report was published for consultation in January 2012. In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council’s consultation database. Subsequent to consultation the SA scope was updated.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

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

4.3 A note on ‘equalities’ and ‘health’ considerations

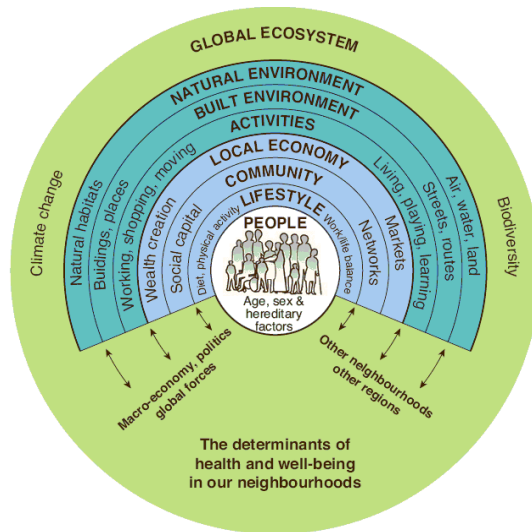
4.3.1 Equality and health considerations (‘issues’) were a focus of scoping work undertaken in late 2013 (when preparing the Scoping Report for consultation) and have also been given further consideration when updating / supplementing the SA scope in 2014 (subsequent to the Scoping Report consultation).

4.3.2 As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence **the SA process ‘integrates’ Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).**

Box 4.1: EqIA and HIA

The Council is not required to undertake **EqIA**, but does have a duty to give "due regard" to promoting equality of opportunity for all protected groups when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected groups’ are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

With regards to **HIA**, there are no requirements on the Council, although the NPPF requires planners to promote healthy communities and use evidence to assess health and wellbeing needs; and additionally, the GLA and the Mayor are required to ‘have regard to health’ in preparing strategies at the London-scale. It is important to understand that HIA is to a large extent about giving consideration to the *determinants of health*, including those related to the quality of the natural and built environment, people’s daily activities and lifestyles, and local communities and the economy.



Barton & Grant (2006)

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

5.1.1 The Development Management Policies DPD, once adopted will set out the detailed development management policies for the Borough; building on the adopted Strategic Policies DPD. The Development Management Policies DPD will be used to guide and shape the development that comes forward in the Borough and will provide the decision-making framework that planning applications will be assessed against.

5.1.2 The objectives of the Development Management Policies DPD are as follows:

- To direct development to appropriate locations and ensure a balance between land uses and in the case of housing, the types of accommodation that should be provided.
- To set out design requirements and environmental sustainability standards.
- To address the need to mitigate any impacts of development on valuable infrastructure and identify the circumstances in which applicants will be required to provide additional infrastructure. This includes social community facilities such as schools; public realm improvements; energy and utilities infrastructure; open space and a range of other types of infrastructure.

5.1.3 The principal influences on plan preparation are the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must adhere to; the Haringey Strategic Policies (2013); and London Plan (2011), along with Draft Further Alterations to the London Plan (FALP) (2014). The DMP DPD is also developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011.

5.2 What's the plan not seeking to achieve?

5.2.1 The plan is not seeking to set the strategic policies for the Borough as these are set out in the Strategic Policies (2013) and London Plan. The plan instead seeks to build on the strategic policies and add greater detail to guide, shape and inform decision-making for development proposals that will come forward during the plan period.

5.2.2 At the same time, the plan will be strategic in nature in that it will omit consideration of some detailed issues in the knowledge that these can be addressed further down the line, i.e. at the planning application stage.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 This chapter introduces key sustainability context messages in relation to broad problems/issues and objectives. The source of context messages includes:

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), which constitutes the Government's view of what sustainable development in England means in practice for the planning system;
- Other Government reports; and
- Reports prepared by other (e.g. third sector) organisations.

6.1.2 Presented below is an updated summary of the context review presented in the Scoping Report (2012).

6.2 Social

Crime

- The NPPF calls on planning authorities to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life. It notes that measures to design out crime should be integral.
- The 'Haringey Community Safety Strategy 2013-2017' notes that following the riots in 2011, it was recommended that the Borough strengthen efforts to seek investment in economic growth, jobs, high quality housing and improved engagement with the communities affected.

Education

- The NPPF notes that providing a 'sufficient choice of school places is of 'great importance' and there is a need on the part of planning authorities to take a 'proactive, positive and collaborative approach' towards achieving this.
- According to the London Plan, the Mayor will support the provision of education facilities in order to meet the demand generated by London's growth.

Health

- The NPPF calls for the setting strategic policies to ensure the provision of health facilities. In terms of the wider determinants of health, it notes that access to high quality open spaces and sport and recreation can make an important contribution.
- The 'Marmot Review' concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked'. The 'Haringey Health and Wellbeing Strategy 2012-2015' endorses the findings of the Marmot review in terms of the need to 'ensure social justice, health and sustainability are at the heart of all policies'.
- The report 'Ready for Ageing?' warns that society is underprepared for the ageing population. Meanwhile, the study 'Under the Weather' finds that heat related illness is

liable to increase under climate change, but that this could be addressed through appropriate urban planning.

- At a local level, Haringey Council recently published for consultation a draft Corporate Plan, 'Building a Stronger Haringey Together'. One of the draft priorities is: "Empower all adults to live healthy, long and fulfilling lives."

Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible, including where housing market areas cross administrative boundaries. The NPPF also notes that:
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - Good design is a key aspect in sustainable development.
 - Authorities should ensure provision of affordable housing
 - Larger developments are sometimes the best means of achieving new homes.
- Each of London's Boroughs are required to fulfil the housing targets as set out in the London Plan, and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality.
- 'Haringey's Housing Strategy 2009-19' sets out Haringey's approach to housing over the next ten years. It includes a vision to create 'neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations'. In October 2014, the Council published for public consultation a new Housing Strategy 2015-2020.

Community cohesion

- The NPPF states that a planning principle is to support strategies to improve health, social and cultural wellbeing for all. There is a need to facilitate social interaction and promote the retention and development of community services and facilities.
- The report Natural Solutions notes that green spaces potentially have a role to play in increasing community cohesion by providing a neutral space for meeting and interacting.
- In the Haringey 'Sustainable Community Strategy 2007-2016' an ambition is set out to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.

Accessibility

- The NPPF notes that the planning system has a role to play in providing accessible local services that reflect community needs and support health, social and cultural well-being.
- The London Plan states that development should provide and improve access to social and community infrastructure. Inclusive design should also be adopted to take into account the needs of older and disabled people.
- The Haringey 'Sustainable Community Strategy 2007-2016' looks to ensure that the Borough's communities have easier access to open spaces, facilities and shopping areas.

6.3 Economic

Economic growth

- The European Union strategy for achieving economic growth up until 2020 focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth.

- According to the NPPF, the planning system can contribute to a responsive economy by ensuring sufficient land of the right type is available in the right places and at the right time; and by identifying and coordinating development requirements. It emphasises the need to:
 - Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
 - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- The Mayor's Economic Development Strategy sets an ambition for London to be the world capital of business, and to have the most competitive business environment in the world.
- The Haringey Regeneration Strategy sets out a key priority to develop a 21st century business economy that offers opportunities for sustainable employment and enterprise, to help make Haringey a place people want to work, visit and invest in.

Skills and training

- The Haringey 'Sustainable Community Strategy 2007-2016' sets an objective to extend training opportunities for people to improve their skills, especially in order to have access to jobs in key areas of commerce and growth.
- The Haringey Regeneration Strategy sets out a key priority to unlock the potential of Haringey residents through increasing skill levels and raising employment so that they can contribute to and benefit from being part of one of the most successful cities in the world.

Economic inclusion

- The London Plan notes that there is a need to tackle persistent poverty and deprivation through a policy framework that helps tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need.
- The Local Growth White Paper notes that growth should be broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings.
- The Haringey 'Sustainable Community Strategy 2007-2016' sets an ambition to target poverty through targeted social inclusion initiatives.

Town centres

- The NPPF emphasises the need to support competitive town centres, and oppose schemes that will impact town centre viability. It calls for town centres to provide a diverse retail offer and to reflect local 'individuality'.
- CLG's (2012) report 'High streets at the heart of our communities' notes that local policies should look to reinforce local distinctiveness and community value of town centres, and develop their social function with a view to underpinning ongoing commercial viability.
- The London Plan calls for the scale of new retail, commercial, culture and leisure developments within town centres to reflect the size, role and function of that centre.

6.4

Environmental

Biodiversity

- The NPPF emphasises the need to protect important sites, plan for green infrastructure and plan for ecological networks whilst taking account the anticipated effects of climate change. National policy reflects the EU Biodiversity Strategy's commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- The Natural Environment White Paper sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and well-being. It signals a move towards protecting biodiversity throughout the landscape.

- The London Plan states calls for priority to be given to achieving Biodiversity Action Plans (BAP) targets and supporting sites within or near to areas deficient in accessible wildlife sites. The Haringey BAP notes that there is a need to consider biodiversity as a cross cutting agenda to be integrated into the delivery of all services.

Townscape and cultural heritage

- The NPPF calls for a 'positive strategy' towards the 'conservation and enjoyment of the historic environment', including assets most at risk. Heritage assets should be recognised as an 'irreplaceable resource' to be conserved in a 'manner appropriate to their significance'.
- The London Plan calls for Local Authorities to maintain and enhance the contribution of the cities 'built, landscaped and buried heritage' to London's environment, culture, and economy.
- English Heritage's 'Heritage at Risk National Strategy' targets the removal of a quarter of nationally designated heritage at risk assets by April 2015. Meanwhile, 'Seeing history in the view' provides a means of understanding views that are recognised as important.

Open space

- The NPPF recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.
- The London Plan states that boroughs should plan for green infrastructure needs to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.
- Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments.

Water resources

- The EU Water Framework Directive drives a catchment-based approach to water management. An Environment Agency strategy implements Directive in relation to groundwater, highlighting that groundwater is at risk from point source and diffuse pollution.
- The NPPF calls for planning authorities to produce strategic policies to deliver the infrastructure necessary for water supply and wastewater and to take account of the effects of climate change in the long term, including on water supply.
- The 'Water White Paper' notes that through measures to encourage and incentivise water efficiency (and demand management measures by water companies), the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- An Environment Agency strategy for restoring rivers in North London considers how rivers play a role in urban regeneration, providing a range of social and environmental benefits.

Soil and land quality

- The NPPF recognises the need to protect and enhance soils; prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil pollution or land instability; and remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.

- The NPPF also highlights the need to encourage the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value.
- The 'Safeguarding our Soils' strategy highlights the vital role soils play in supporting ecosystems, facilitating drainage and providing urban green spaces for communities.

Flood risk and climate change

- The EU's 'Blueprint to Safeguard Europe's Water Resources' promotes the use of green infrastructure, such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts.
- The NPPF notes that development should be directed away from areas at highest risk from flooding. Where development is necessary, it should be made safe without increasing risk elsewhere. New developments should be planned to avoid vulnerability to climate change.
- The 'Flood and Water Management Act' calls for the incorporation of greater resilience measures into new buildings, retro-fitting at risk properties, and utilising the environment to address risk (e.g. harnessing wetlands to store water). 'Planning for SuDS' calls for greater recognition of the multiple benefits this form of water management can provide.

Air quality

- The EU Thematic Strategy on Air Pollution aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).
- According to the NPPF, plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas. New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.
- The Mayor's Air Quality Strategy notes that air pollution harms the environment and health, with greater impacts felt most severely by vulnerable people, such as children and the elderly. The London Plan seeks to ensure that development is at least 'air quality neutral'.

Noise

- The NPPF states that planning policies should aim to avoid noise that gives rise to significant adverse impacts on health and quality of life.
- The Mayor's Ambient Noise Strategy focuses on reducing noise through better management of transport systems, better town planning, and better design of buildings.

Energy and carbon

- On energy, the European Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008⁶. Plan-making should, for example, support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment
- The London Plan seeks to reduce London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. Haringey Council has set an ambitious target to reduce borough-wide carbon emissions by 40% by 2020 from a 2005 baseline.

⁶ In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.

Waste management

- The Mayor's municipal waste management strategy aims provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste, including minimising its impact on the environment and unlocking its economic value.
- The seven north London boroughs are preparing a joint Waste Plan. This plan will identify a range of suitable sites for waste management uses, to meet London Plan waste apportionments, and include policies and guidelines for determining planning applications.

Sustainable transport

- The NPPF states that the transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport). To minimise journey lengths planning policies should aim for 'a balance of land uses', and where practical, key facilities should be located within walking distance or be well served by public transport.
- Haringey encourages 'sustainable' forms of transport through measures including the Haringey Walking Plan, Cycling Action Plan and Haringey Cycle Route Network.

7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The SA Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan';
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Once the baseline has been established it can be used as a 'benchmark' against which to assess effects.

7.1.2 Presented below is an updated summary of the baseline review presented in the Scoping Report (2012).

7.2 Social

Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the Borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is above the London average (8.6%), but below the national level (9.3%). This is most acute in Tottenham Hale, with 22.45% of residents aged 16 and over having no qualifications.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.

Health

- Health and well-being in Haringey is very similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further.
- Health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the Borough. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.

- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese.

Housing

- Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The Borough has notable levels of homelessness, with 3000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the Borough (which is more densely populated than the west).
- At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London.
- The 2011 Census shows that the Borough; population was recorded as 254,926. This presents a significant change from the 2001 Census. The Borough has population density of 86.2 persons per hectare; well above the London average (52.0). The Borough's population is set to increase by 31,234 over the period 2011-2021.

Community Cohesion

- The 2011 Census showed that Haringey's population increased by 38,390 from 216,510 in 2001 to 254,900 in March 2011 (an 18% increase).
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. Nearly half the population comes from ethnic minority backgrounds.
- The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey.
- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 13th most deprived local authority in England. There are particular pockets of deprivation such as in Tottenham Northumberland Park, Wood Green and Hornsey. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England.

Accessibility

- Education is highly accessible, with 100% of 5 to 10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and 100% of 16-19 year olds within 30 minutes of further education.

7.3 Economic

Economic growth

- When it is compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. The level of employment declined by 7.1% between 2008-10 almost double the London and National averages.
- Low wages act as a barrier to home ownership and limit residents' housing options. Worklessness, isolation and low income have adverse effects upon resident's health and well-being. Employment growth is below the London average.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 or less people. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. Business stakeholders have expressed concern about the range of business premises available in the borough.

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles⁷ (55.4%) across Haringey were higher than the London average (54.6) and significantly above the percentage for Great Britain of 44.5%. The percentage of the Borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The Borough is characterised by its polarised skills base. Around 21% of the Borough's working age population has a level 1 or below qualification. Meanwhile, 40% have a level 4 or above qualification.

Economic inclusion

- The total number of economically active in 2011 was 65.5% with 6.1% unemployed. This compares reasonably favourably with London, where 66.5% were economically active in 2011, with 8.4% unemployed.
- Tottenham has some of the highest levels of unemployment in London and the UK. In 2011, 63.7% of people aged 16-64 in Tottenham were in employment, below both the London and England rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64). This is significantly above the England and London rates.

Town centres

- Haringey has a range of town centres providing shopping and services and local employment. The Wood Green Metropolitan Town Centre is the highest ranking shopping centre in the Borough with 106,000 square metres of floorspace.
- It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the Borough to fulfil their role and function

⁷ Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

- Haringey's town centre vacancy rates have increased in recent years but overall, they remain lower than national and regional averages. However, the borough's town centres are not performing equally in this respect.
- Crouch End and Green Lanes have the highest percentages of vacant town centre floor space, with 8.7% and 6.9% respectively. Wood Green (3.3%) is the best performing.

7.4 Environmental

Biodiversity

- Three European Sites are within a 10 km radius of Haringey – Lee Valley Ramsar Site, Lee Valley Special Protection Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- The Borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance. Of these, five are of Metropolitan Importance, 22 of Borough Importance Grade I and Borough Grade II and 33 of Local Importance. Haringey also has five Local Nature Reserves (LNRs) - Alexandra Palace & Park, Coldfall Wood, Parkland Walk, Railway Fields and Queens Wood. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced.
- The Lee Valley Regional Park straddles the eastern boundary of the Borough. This area is home to European designated sites and is a Site of Special Scientific Interest.
- Natural England suggests a ratio of 1 hectare of Local Nature Reserve for every 1000 of population. Haringey currently has 0.6 hectares per 1000 residents.

Townscape and cultural heritage

- The Boroughs historic assets include 467 listed buildings of Special Architectural or Historic Interest, six Grade I buildings and 434 Grade II buildings, 1150 locally listed Buildings of Merit, 29 Conservation Areas, two Registered Parks and Gardens, 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. All cultural heritage features should be conserved.
- Haringey has a number of adopted Conservation Area Character Appraisals⁸ that define the special architectural and historic interest of each of the 29 Conservation Areas and include a number of proposals that aim to protect and enhance the Conservation Areas.
- English Heritage identifies Finsbury Park and Alexandra Park in their Register of Parks and Gardens of Special Historic Interest in England. Whilst preserving statutory sites, it is important to ensure that the wider historic landscape is also protected and enhanced and that cultural heritage issues are addressed by new development.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace. This is up from 17 buildings in 2008.
- In Haringey, the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Viewing Corridor.

Open space

- The Lee Valley presents a significant recreational waterway, which could serve to link Haringey with developments in East London most notably the Olympic Park. The Lee Valley Regional Park is Haringey's single area of designated Green Belt and should continue to be protected. Efforts to encourage access for all to the River Lee must be supported, with a view to enabling health and educational excursions for residents and visitors.

⁸ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

- Haringey has a network of Metropolitan Open Land and Significant Local Open Land. Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked.
- The All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- There is a need to improve accessibility to and quality of open spaces; explore opportunities for accessible open spaces within new development and the opportunities to link open spaces; and improve smaller open spaces and green areas.
- The Borough has an overall provision of 1.7 ha of open space per 1,000 of population. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward.

Water resources

- Haringey is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment. The modification of rivers including in-stream structures and culverts has led to loss of habitat diversity and the creation of barriers for fish migration.
- The Moselle Brook and Stonebridge Brook is heavily modified and opportunities to deculvert and improve the ecological value of the brook should be taken. These Brooks are both tributaries of the Lower Lee River, classified as 'poor' ecological status and failing to meet 'good ecological potential' under the Water Framework Directive.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- The Borough is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.
- The GLA⁹ estimate that buildings cover 24,000 hectares or 16 per cent of Greater London. Crude calculations of the potential for green roofs in four areas of central London suggest that out of a surface area of 10 million m², 3.2 million m² had the potential to be greened. This would give a potential energy saving of 19,200 MWh per year or the equivalent of 8,256 CO₂e tonnes, and a capacity to store in the region of 80,000m³ of rainwater at roof level, the equivalent to, approximately, the volume of water needed for 35 Olympic swimming pools.
- Haringey-specific data is not available for water consumption however at the London level¹⁰ the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

Soil and land quality

- A variety of industrial land uses have left behind substantial contamination in the borough, which may need to be remediated before development. The Borough's Contaminated Land Strategy identified potentially contaminated sites in the borough.

⁹ GLA (2008) Living Roofs and Walls Technical Report: Supporting London Plan Policy [online] available at: <http://www.london.gov.uk/sites/default/files/living-roofs.pdf> (accessed 10/14)

¹⁰ Environment Agency (2013) State of the Environment Report for London [online] available at: <http://data.london.gov.uk/documents/SOE-2011-report.pdf> (accessed 10/14)

- Brownfield sites should be prioritised and sites which offer the greatest capacity for development. Previously developed land (PDL) within Haringey accounts for approximately for 3% of London's total PDL area.
- The Greater London Authority had identified 29 PDL sites in Haringey, which cover 84.9ha of land. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL. In 2011/12, 100% of housing was built on PDL.

Flood risk and climate change

- According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced. There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences would be significant.
- Climate change effects increase the severity and frequency of the flood risk. The extent and frequency of surface water flooding would be increased across the borough. The standard of protection from river flooding is also reduced by climate change effects in some parts of the borough adjacent to the River Lea.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the Borough. Tottenham Hale is the most vulnerable ward, with more than 50% lying within Flood Zone 2.

Air quality

- The Borough suffers poor air quality primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park.
- There are no sites listed as producing emissions to air, although the Edmonton Solid Waste Incinerator is located just beyond the Borough's northeast boundary.

Noise

- There is no suitable baseline data available for this SA topic, however anecdotally concentrations of noise exist along transport corridors in the Borough.

Energy and carbon

- The Borough has adopted a target of reducing its CO₂ emissions by 40% In line with the London Plan energy hierarchy. The population of Haringey is expected to increase during the plan period to 2050. If this growth occurs emissions are expected to increase.
- Haringey Annual Carbon Report explains the current situation in relation to a range of energy/carbon issues. A headline message is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%. This is consistent with London wide and national trends; London wide emissions have increased by 8% and UK emissions by 5.3%.
- It is also noted that in 2013 Haringey Council led a successful application to the Department of Energy and Climate Change for 'Green Deal Communities' funding, to deliver a programme that will reduce energy costs for households and businesses in Haringey, encourage eco-retrofit and drive sustainable economic growth.

Waste management

- The total amount of Municipal Solid Waste collected by Haringey in 2011 was 115,793 tonnes. 29% of the total was sent to landfill or 33,578 tonnes. Haringey has an overall capacity for waste management of approximately 104,800 tonnes per annum.
- The Borough achieves good recycling rates. There are two Reuse & Recycling Centres and these accept an increasing range of materials and items for reuse or recycling. Other

waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the Borough. The overall recycling and composting rate for the North London Waste Authority, including Haringey is 24%.

Sustainable transport

- Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes.
- Over half of Haringey households do not own a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car.
- Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider Borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital.
- Stronger orbital public transport capacity is required to serve key development areas and town centres. There is also a need for improved connectivity to key employment areas outside of the borough including Stratford, Brent Cross and Stansted Airport.

8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

The SA Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal.

8.1.1 Drawing on the review of the sustainability context and baseline, the Scoping Report (2012) was able to identify a list of key sustainability issues that should be a focus of SA. This list was then refined further into a concise list of key sustainability objectives for the Development Management Policies DPD. These objectives (and the associated criteria) provide a methodological 'framework' for SA.

8.2 Sustainability objectives (the 'SA framework')

8.2.1 As discussed above, a key outcome of scoping work is a list of sustainability objectives that can be drawn upon as a methodological 'framework' for SA, i.e. can be used to guide the appraisal of significant effects on the baseline.

Table 8.1: The SA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Social		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> • Encourage safety by design? • Reduce levels of crime? • Reduce the fear of crime? • Reduce levels of antisocial behaviour?
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education for all members of society? • Improve the provision of and access to education and training facilities? • Ensure educational facilities are accessible to residential areas? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> • Improve access to health and social care services? • Prolong life expectancy and improve well-being? • Promote a network of quality, accessible open spaces? • Promote healthy lifestyles? • Provide good quality outdoor sports facilities and sites?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> • Reduce homelessness? • Increase the availability of affordable housing? • Improve the condition of Local Authority housing stock? • Improve the diversity of the housing stock? • Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character? • Create balanced communities of different affordable housing types, densities and tenures? • Create integrated, mixed-use tenure developments?
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> • Promote a sense of cultural identity, belonging and well-being? • Develop opportunities for community involvement? • Support strong relationships between people from different backgrounds and communities?
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> • Improve access to cultural and leisure facilities? • Maintain and improve access to essential services (banking, health, education) facilities?
Economic		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> • Retain existing local employment and create local employment opportunities? • Diversify employment opportunities? • Meet the needs of different sectors of the economy? • To facilitate new land and business development?
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> • Improve lifelong learning opportunities and work related training? • Reduce high levels of unemployment and worklessness? • Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> • Improve physical accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> • Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> Protect and enhance biodiversity at designated and non-designated sites? Link and enhance habitats and wildlife corridors? Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> Promote townscape character and quality? Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> Promote a network of quality, accessible open spaces? Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> Preserve ground and surface water quality? Conserve water resources? Incorporate measures to reduce water consumption?
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> Encourage the development and remediation of brownfield land? Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> Reduce and manage flood risk from all sources? Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> Manage air quality within the borough? Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> Minimise the impact of the ambient noise environment?
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> Minimise the use of energy? Increase energy efficiency and support affordable warmth initiatives? Increase the use of renewable energy? Mitigate against the urban heat island effect? Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? Encourage the re-use of goods? Reduce the production of waste? Support the use of sustainable materials and construction methods? Increase the proportion of waste recycling and composting across all sectors?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> • Improve the amenity and connectivity of walking and cycling routes? • Promote the use of public transport? • Reduce the use of the private car? • Encourage development in growth areas and town centres and reduce commuting?

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

9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan)

This part of the Report is yet to be completed.

Once complete, this part of the report will explain how preparation of the draft plan has been informed by appraisal of alternatives for a range of policy areas / issues.

It is anticipated that information on alternatives will be presented for 14 issues.

Specifically, for each issue / set of alternatives the following questions will be answered -

- What are the reasons for focusing appraisal on this issue / set of alternatives?
- What are the appraisal findings (in relation to the set of alternatives in question)?
- What are the Council's reasons for selecting the preferred approach in-light of the appraisal findings?

10**TBC**

PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

11 INTRODUCTION (TO PART 3)

The report must include...

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

This part of the Report is yet to be completed.

Once complete, this part of the report will present an appraisal of the draft plan.

For each of the 21 sustainability topics (see the Introduction to Part 1, above), the appraisal will identify and evaluate the 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability issues and objectives identified through scoping (see Part 1) as a methodological framework. Recommendations will be made, which can be taken into account subsequent to the consultation (alongside consultation responses) when preparing the proposed submission version of the plan.

12 TBC

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

13

14 INTRODUCTION (TO PART 4)

The report must include...

- Measures envisaged concerning monitoring.

14.1.1 This part of the report explains next steps that will be taken as part of plan-making / SA.

15 PLAN FINALISATION

Publication

15.1.1 Subsequent to the current consultation it is the Council's intention to prepare the final draft ('proposed submission') version of the plan for publication. This will be the version which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, representations made through the current consultation and also alternatives appraisal work.

 15.1.2 **The SA Report** (as opposed to an *Interim* SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the Regulations. Table 15.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 15.1: Information contained within this Interim SA Report and the forthcoming SA Report

Part / SA Question	This Interim SA Report	The SA Report
Part 1: What's the scope of the SA?	<ul style="list-style-type: none"> • The Scope of the SA; summarised as appropriate. 	
Part 2: What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of appraisal. • Alternatives appraisal findings. • Reasons for having selected the preferred (proposed submission) approach in light of alternatives appraisal. 	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of interim appraisal. • Interim appraisal findings. <ul style="list-style-type: none"> • i.e. alternatives appraisal findings and appraisal findings from Part 3 of this report. • Reasons for having selected the preferred (proposed submission) approach in light of interim appraisal.
Part 3: What are the SA findings at this stage?	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan. 	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan.
Part 4: What are the next steps?	<ul style="list-style-type: none"> • A general discussion of what happens next. 	<ul style="list-style-type: none"> • A discussion of what happens next; and 'measures envisaged concerning monitoring'

Submission / adoption

- 15.1.3 Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other sources of evidence) before determining whether the plan is sound (or requires further modifications).
- 15.1.4 Once found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	January 2014	Interim SA Report published alongside the draft version of the Site Allocations DPD	Anthony Whitaker, Assistant Planner Charlotte Simpson, Assistant Planner James Salmon, Graduate Planner	Mark Fessey, Principal Consultant	Steve Smith, Technical Director

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

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Site Allocations DPD. Once adopted, the plan will present a policy framework for those sites that will accommodate the majority of development in the Borough over the next 20 years.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including ‘equalities’ and ‘health’ issues¹), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the AAP is a legal requirement.²

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.³
- 2.1.2 In-line with the Regulations, a report (which we call **the SA Report**) must be published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **the SA Report must answer the following four questions:**
1. What’s the scope of the SA?
 - The scope must be established subsequent to a review of the sustainability context and baseline, and consultation with designated agencies.
 2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point ‘reasonable alternatives’ are appraised.
 3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?

3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a complete draft plan. Rather, the Council is consulting on an early draft plan. This Interim SA Report is produced with the intention of informing the consultation and subsequent preparation of the draft (‘proposed submission’) version of the plan.

Structure of this Interim SA Report

- 3.1.2 Despite this being an ‘Interim’ SA Report (i.e. a document that does not need to provide the information legally required of the SA Report) it is nonetheless helpful to structure this report according to the four questions listed above.

¹ As part of this SA process, explicit consideration is being given to ‘equalities’ and ‘health’ issues, and as such this SA process can be said to be integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). More on the SA scope – i.e. the scope of issues that are a focus of SA – is explained in ‘Part 1’ of this Report.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that Local Planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012).

³ Directive 2001/42/EC

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the ‘scope’ of the SA. In particular, and as required by the Regulations⁴, this Part of the SA Report answers the following questions.

- What’s the Plan seeking to achieve?
- What’s the sustainability ‘context’?
- What’s the sustainability ‘baseline’?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 21 broad sustainability topics:

	Broad sustainability topics	
Social	<ul style="list-style-type: none"> • Crime • Education • Health 	<ul style="list-style-type: none"> • Housing • Community Cohesion • Accessibility
Economic	<ul style="list-style-type: none"> • Economic Growth • Skills and Training 	<ul style="list-style-type: none"> • Economic Inclusion • Town Centres
Environmental	<ul style="list-style-type: none"> • Biodiversity • Townscape and Cultural Heritage • Open Space • Water Resources • Soil and Land Quality • Flood Risk and Climate Change 	<ul style="list-style-type: none"> • Air Quality • Noise • Energy and Carbon • Waste Management • Sustainable Transport

4.2 Consultation on the scope

4.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the [SA] Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans”*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁵

4.2.2 As such, an SA Scoping Report⁶ was published for consultation in January 2012. In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council’s consultation database. Subsequent to consultation the SA scope was updated.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

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

⁶ The SA Scoping Report is available at: http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/site-allocations-dpd.htm

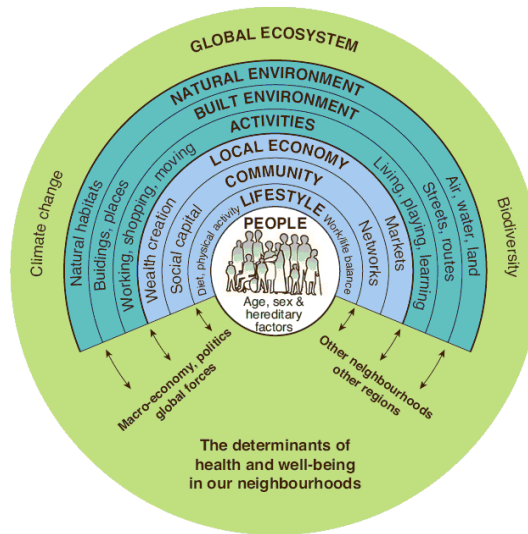
4.3 A note on ‘equalities’ and ‘health’ considerations

- 4.3.1 Equality and health considerations (‘issues’) were a focus of scoping work undertaken in late 2013 (when preparing the Scoping Report for consultation) and have also been given further consideration when updating / supplementing the SA scope in 2014 (subsequent to the Scoping Report consultation).
- 4.3.2 As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence **the SA process ‘integrates’ Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).**

Box 4.1: EqIA and HIA

The Council is not required to undertake **EqIA**, but does have a duty to give "due regard" to promoting equality of opportunity for all protected groups when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected groups’ are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

With regards to **HIA**, there are no requirements on the Council, although the NPPF requires planners to promote healthy communities and use evidence to assess health and wellbeing needs; and additionally, the GLA and the Mayor are required to ‘have regard to health’ in preparing strategies at the London-scale. It is important to understand that HIA is to a large extent about giving consideration to the *determinants of health*, including those related to the quality of the natural and built environment, people’s daily activities and lifestyles, and local communities and the economy.



Barton & Grant (2006)

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

- 5.1.1 The Site Allocations DPD, once adopted, will set out the key development sites which will accommodate the majority of development in the Borough over the next 20 years.
- 5.1.2 Larger, more strategic sites will benefit from having a Site Allocation, to ensure that:
 - The appropriate level of development occurs on the site;
 - A positive approach to design is taken;
 - Infrastructure is provided in a timely manner to serve the growing local community.
- 5.1.3 Once adopted, the Site Allocations document will enable the Council to determine planning applications and make interventions on sites in line with the allocations. If these sites are not safeguarded for specific uses, the borough would be at risk of not being able to facilitate and deliver mixed and balanced, sustainable communities, and meet its identified housing and employment targets.
- 5.1.4 The main influences on plan preparation are the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must adhere to; Haringey’s Strategic Policies DPD (2013) and London Plan (2011). In addition, the Draft Further Alterations to the London Plan (FALP) (2014) have been considered. The Site Allocations DPD is also developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the ‘Duty to Cooperate’ established by the Localism Act 2011.

5.2 What’s the plan not seeking to achieve?

- 5.2.1 The plan is not seeking to allocate all of the sites to be developed over the plan period. It only focuses on those sites that are most strategic and would benefit from having an allocation, in order to ensure that the Council meets its housing and employment targets as set out in the Core Strategy Strategic Policies. Many developments will take place which can be satisfactorily managed using policies included in the Strategic Policies DPD and Development Management Policies DPD.
- 5.2.2 Furthermore, even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 This chapter introduces key sustainability context messages in relation to broad problems/issues and objectives. The source of context messages includes:

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), which constitutes the Government's view of what sustainable development in England means in practice for the planning system;
- Other Government reports; and
- Reports prepared by other (e.g. third sector) organisations.

6.1.2 Presented below is an updated summary of the context review presented in the Scoping Report (2012).

6.2 Social

Crime

- The NPPF calls on planning authorities to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life. It notes that measures to design out crime should be integral.
- The 'Haringey Community Safety Strategy 2013-2017' notes that following the riots in 2011, it was recommended that the Borough strengthen efforts to seek investment in economic growth, jobs, high quality housing and improved engagement with the communities affected.

Education

- The NPPF notes that providing a 'sufficient choice of school places is of 'great importance' and there is a need on the part of planning authorities to take a 'proactive, positive and collaborative approach' towards achieving this.
- According to the London Plan, the Mayor will support the provision of education facilities in order to meet the demand generated by London's growth.

Health

- The NPPF calls for the setting strategic policies to ensure the provision of health facilities. In terms of the wider determinants of health, it notes that access to high quality open spaces and sport and recreation can make an important contribution.
- The 'Marmot Review' concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked'. The 'Haringey Health and Wellbeing Strategy 2012-2015' endorses the findings of the Marmot review in terms of the need to 'ensure social justice, health and sustainability are at the heart of all policies'.
- The report 'Ready for Ageing?' warns that society is underprepared for the ageing population. Meanwhile, the study 'Under the Weather' finds that heat related illness is

liable to increase under climate change, but that this could be addressed through appropriate urban planning.

- At a local level, Haringey Council recently published for consultation a draft Corporate Plan, 'Building a Stronger Haringey Together'. One of the draft priorities is: "Empower all adults to live healthy, long and fulfilling lives."

Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible, including where housing market areas cross administrative boundaries. The NPPF also notes that:
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - Good design is a key aspect in sustainable development.
 - Authorities should ensure provision of affordable housing
 - Larger developments are sometimes the best means of achieving new homes.
- Each of London's Boroughs are required to fulfil the housing targets as set out in the London Plan, and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality.
- 'Haringey's Housing Strategy 2009-19' sets out Haringey's approach to housing over the next ten years. It includes a vision to create 'neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations'. In October 2014, the Council published for public consultation a new Housing Strategy 2015-2020.

Community cohesion

- The NPPF states that a planning principle is to support strategies to improve health, social and cultural wellbeing for all. There is a need to facilitate social interaction and promote the retention and development of community services and facilities.
- The report Natural Solutions notes that green spaces potentially have a role to play in increasing community cohesion by providing a neutral space for meeting and interacting.
- In the Haringey 'Sustainable Community Strategy 2007-2016' an ambition is set out to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.

Accessibility

- The NPPF notes that the planning system has a role to play in providing accessible local services that reflect community needs and support health, social and cultural well-being.
- The London Plan states that development should provide and improve access to social and community infrastructure. Inclusive design should also be adopted to take into account the needs of older and disabled people.
- The Haringey 'Sustainable Community Strategy 2007-2016' looks to ensure that the Borough's communities have easier access to open spaces, facilities and shopping areas.

6.3

Economic

Economic growth

- The European Union strategy for achieving economic growth up until 2020 focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth.

- According to the NPPF, the planning system can contribute to a responsive economy by ensuring sufficient land of the right type is available in the right places and at the right time; and by identifying and coordinating development requirements. It emphasises the need to:
 - Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
 - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- The Mayor's Economic Development Strategy sets an ambition for London to be the world capital of business, and to have the most competitive business environment in the world.
- The Haringey Regeneration Strategy sets out a key priority to develop a 21st century business economy that offers opportunities for sustainable employment and enterprise, to help make Haringey a place people want to work, visit and invest in.

Skills and training

- The Haringey 'Sustainable Community Strategy 2007-2016' sets an objective to extend training opportunities for people to improve their skills, especially in order to have access to jobs in key areas of commerce and growth.
- The Haringey Regeneration Strategy sets out a key priority to unlock the potential of Haringey residents through increasing skill levels and raising employment so that they can contribute to and benefit from being part of one of the most successful cities in the world.

Economic inclusion

- The London Plan notes that there is a need to tackle persistent poverty and deprivation through a policy framework that helps tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need.
- The Local Growth White Paper notes that growth should be broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings.
- The Haringey 'Sustainable Community Strategy 2007-2016' sets an ambition to target poverty through targeted social inclusion initiatives.

Town centres

- The NPPF emphasises the need to support competitive town centres, and oppose schemes that will impact town centre viability. It calls for town centres to provide a diverse retail offer and to reflect local 'individuality'.
- CLG's (2012) report 'High streets at the heart of our communities' notes that local policies should look to reinforce local distinctiveness and community value of town centres, and develop their social function with a view to underpinning ongoing commercial viability.
- The London Plan calls for the scale of new retail, commercial, culture and leisure developments within town centres to reflect the size, role and function of that centre.

6.4

Environmental

Biodiversity

- The NPPF emphasises the need to protect important sites, plan for green infrastructure and plan for ecological networks whilst taking account the anticipated effects of climate change. National policy reflects the EU Biodiversity Strategy's commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- The Natural Environment White Paper sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and well-being. It signals a move towards protecting biodiversity throughout the landscape.

- The London Plan states calls for priority to be given to achieving Biodiversity Action Plans (BAP) targets and supporting sites within or near to areas deficient in accessible wildlife sites. The Haringey BAP notes that there is a need to consider biodiversity as a cross cutting agenda to be integrated into the delivery of all services.

Townscape and cultural heritage

- The NPPF calls for a 'positive strategy' towards the 'conservation and enjoyment of the historic environment', including assets most at risk. Heritage assets should be recognised as an 'irreplaceable resource' to be conserved in a 'manner appropriate to their significance'.
- The London Plan calls for Local Authorities to maintain and enhance the contribution of the cities 'built, landscaped and buried heritage' to London's environment, culture, and economy.
- English Heritage's 'Heritage at Risk National Strategy' targets the removal of a quarter of nationally designated heritage at risk assets by April 2015. Meanwhile, 'Seeing history in the view' provides a means of understanding views that are recognised as important.

Open space

- The NPPF recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.
- The London Plan states that boroughs should plan for green infrastructure needs to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.
- Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments.

Water resources

- The EU Water Framework Directive drives a catchment-based approach to water management. An Environment Agency strategy implements Directive in relation to groundwater, highlighting that groundwater is at risk from point source and diffuse pollution.
- The NPPF calls for planning authorities to produce strategic policies to deliver the infrastructure necessary for water supply and wastewater and to take account of the effects of climate change in the long term, including on water supply.
- The 'Water White Paper' notes that through measures to encourage and incentivise water efficiency (and demand management measures by water companies), the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- An Environment Agency strategy for restoring rivers in North London considers how rivers play a role in urban regeneration, providing a range of social and environmental benefits.

Soil and land quality

- The NPPF recognises the need to protect and enhance soils; prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil pollution or land instability; and remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.

- The NPPF also highlights the need to encourage the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value.
- The 'Safeguarding our Soils' strategy highlights the vital role soils play in supporting ecosystems, facilitating drainage and providing urban green spaces for communities.

Flood risk and climate change

- The EU's 'Blueprint to Safeguard Europe's Water Resources' promotes the use of green infrastructure, such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts.
- The NPPF notes that development should be directed away from areas at highest risk from flooding. Where development is necessary, it should be made safe without increasing risk elsewhere. New developments should be planned to avoid vulnerability to climate change.
- The 'Flood and Water Management Act' calls for the incorporation of greater resilience measures into new buildings, retro-fitting at risk properties, and utilising the environment to address risk (e.g. harnessing wetlands to store water). 'Planning for SuDS' calls for greater recognition of the multiple benefits this form of water management can provide.

Air quality

- The EU Thematic Strategy on Air Pollution aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).
- According to the NPPF, plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas. New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.
- The Mayor's Air Quality Strategy notes that air pollution harms the environment and health, with greater impacts felt most severely by vulnerable people, such as children and the elderly. The London Plan seeks to ensure that development is at least 'air quality neutral'.

Noise

- The NPPF states that planning policies should aim to avoid noise that gives rise to significant adverse impacts on health and quality of life.
- The Mayor's Ambient Noise Strategy focuses on reducing noise through better management of transport systems, better town planning, and better design of buildings.

Energy and carbon

- On energy, the European Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008⁷. Plan-making should, for example, support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment
- The London Plan seeks to reduce London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. Haringey Council has set an ambitious target to reduce borough-wide carbon emissions by 40% by 2020 from a 2005 baseline.

⁷ In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.

Waste management

- The Mayor's municipal waste management strategy aims provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste, including minimising its impact on the environment and unlocking its economic value.
- The seven north London boroughs are preparing a joint Waste Plan. This plan will identify a range of suitable sites for waste management uses, to meet London Plan waste apportionments, and include policies and guidelines for determining planning applications.

Sustainable transport

- The NPPF states that the transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport). To minimise journey lengths planning policies should aim for 'a balance of land uses', and where practical, key facilities should be located within walking distance or be well served by public transport.
- Haringey encourages 'sustainable' forms of transport through measures including the Haringey Walking Plan, Cycling Action Plan and Haringey Cycle Route Network.

7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The SA Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan';
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Once the baseline has been established it can be used as a 'benchmark' against which to assess effects.

7.1.2 Presented below is an updated summary of the baseline review presented in the Scoping Report (2012).

7.2 Social

Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the Borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is above the London average (8.6%), but below the national level (9.3%). This is most acute in Tottenham Hale, with 22.45% of residents aged 16 and over having no qualifications.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.

Health

- Health and well-being in Haringey is very similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further.
- Health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the Borough. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.

- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese.

Housing

- Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The Borough has notable levels of homelessness, with 3000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the Borough (which is more densely populated than the west).
- At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London.
- The 2011 Census shows that the Borough; population was recorded as 254,926. This presents a significant change from the 2001 Census. The Borough has population density of 86.2 persons per hectare; well above the London average (52.0). The Borough's population is set to increase by 31,234 over the period 2011-2021.

Community Cohesion

- The 2011 Census showed that Haringey's population increased by 38,390 from 216,510 in 2001 to 254,900 in March 2011 (an 18% increase).
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. Nearly half the population comes from ethnic minority backgrounds.
- The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey.
- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 13th most deprived local authority in England. There are particular pockets of deprivation such as in Tottenham Northumberland Park, Wood Green and Hornsey. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England.

Accessibility

- Education is highly accessible, with 100% of 5 to 10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and 100% of 16-19 year olds within 30 minutes of further education.

7.3 Economic

Economic growth

- When it is compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. The level of employment declined by 7.1% between 2008-10 almost double the London and National averages.
- Low wages act as a barrier to home ownership and limit residents' housing options. Worklessness, isolation and low income have adverse effects upon resident's health and well-being. Employment growth is below the London average.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 or less people. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. Business stakeholders have expressed concern about the range of business premises available in the borough.

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles⁸ (55.4%) across Haringey were higher than the London average (54.6) and significantly above the percentage for Great Britain of 44.5%. The percentage of the Borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The Borough is characterised by its polarised skills base. Around 21% of the Borough's working age population has a level 1 or below qualification. Meanwhile, 40% have a level 4 or above qualification.

Economic inclusion

- The total number of economically active in 2011 was 65.5% with 6.1% unemployed. This compares reasonably favourably with London, where 66.5% were economically active in 2011, with 8.4% unemployed.
- Tottenham has some of the highest levels of unemployment in London and the UK. In 2011, 63.7% of people aged 16-64 in Tottenham were in employment, below both the London and England rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64). This is significantly above the England and London rates.

Town centres

- Haringey has a range of town centres providing shopping and services and local employment. The Wood Green Metropolitan Town Centre is the highest ranking shopping centre in the Borough with 106,000 square metres of floorspace.
- It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the Borough to fulfil their role and function

⁸ Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

- Haringey's town centre vacancy rates have increased in recent years but overall, they remain lower than national and regional averages. However, the borough's town centres are not performing equally in this respect.
- Crouch End and Green Lanes have the highest percentages of vacant town centre floor space, with 8.7% and 6.9% respectively. Wood Green (3.3%) is the best performing.

7.4

Environmental

Biodiversity

- Three European Sites are within a 10 km radius of Haringey – Lee Valley Ramsar Site, Lee Valley Special Protection Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- The Borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance. Of these, five are of Metropolitan Importance, 22 of Borough Importance Grade I and Borough Grade II and 33 of Local Importance. Haringey also has five Local Nature Reserves (LNRs) - Alexandra Palace & Park, Coldfall Wood, Parkland Walk, Railway Fields and Queens Wood. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced.
- The Lee Valley Regional Park straddles the eastern boundary of the Borough. This area is home to European designated sites and is a Site of Special Scientific Interest.
- Natural England suggests a ratio of 1 hectare of Local Nature Reserve for every 1000 of population. Haringey currently has 0.6 hectares per 1000 residents.

Townscape and cultural heritage

- The Boroughs historic assets include 467 listed buildings of Special Architectural or Historic Interest, six Grade I buildings and 434 Grade II buildings, 1150 locally listed Buildings of Merit, 29 Conservation Areas, two Registered Parks and Gardens, 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. All cultural heritage features should be conserved.
- Haringey has a number of adopted Conservation Area Character Appraisals⁹ that define the special architectural and historic interest of each of the 29 Conservation Areas and include a number of proposals that aim to protect and enhance the Conservation Areas.
- English Heritage identifies Finsbury Park and Alexandra Park in their Register of Parks and Gardens of Special Historic Interest in England. Whilst preserving statutory sites, it is important to ensure that the wider historic landscape is also protected and enhanced and that cultural heritage issues are addressed by new development.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace. This is up from 17 buildings in 2008.
- In Haringey, the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Viewing Corridor.

Open space

- The Lee Valley presents a significant recreational waterway, which could serve to link Haringey with developments in East London most notably the Olympic Park. The Lee Valley Regional Park is Haringey's single area of designated Green Belt and should continue to be protected. Efforts to encourage access for all to the River Lee must be supported, with a view to enabling health and educational excursions for residents and visitors.

⁹ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

- Haringey has a network of Metropolitan Open Land and Significant Local Open Land. Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked.
- The All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- There is a need to improve accessibility to and quality of open spaces; explore opportunities for accessible open spaces within new development and the opportunities to link open spaces; and improve smaller open spaces and green areas.
- The Borough has an overall provision of 1.7 ha of open space per 1,000 of population. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward.

Water resources

- Haringey is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment. The modification of rivers including in-stream structures and culverts has led to loss of habitat diversity and the creation of barriers for fish migration.
- The Moselle Brook and Stonebridge Brook is heavily modified and opportunities to deculvert and improve the ecological value of the brook should be taken. These Brooks are both tributaries of the Lower Lee River, classified as 'poor' ecological status and failing to meet 'good ecological potential' under the Water Framework Directive.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- The Borough is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.
- The GLA¹⁰ estimate that buildings cover 24,000 hectares or 16 per cent of Greater London. Crude calculations of the potential for green roofs in four areas of central London suggest that out of a surface area of 10 million m², 3.2 million m² had the potential to be greened. This would give a potential energy saving of 19,200 MWh per year or the equivalent of 8,256 CO₂e tonnes, and a capacity to store in the region of 80,000m³ of rainwater at roof level, the equivalent to, approximately, the volume of water needed for 35 Olympic swimming pools.
- Haringey-specific data is not available for water consumption however at the London level¹¹ the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

Soil and land quality

- A variety of industrial land uses have left behind substantial contamination in the borough, which may need to be remediated before development. The Borough's Contaminated Land Strategy identified potentially contaminated sites in the borough.

¹⁰ GLA (2008) Living Roofs and Walls Technical Report: Supporting London Plan Policy [online] available at: <http://www.london.gov.uk/sites/default/files/living-roofs.pdf> (accessed 10/14)

¹¹ Environment Agency (2013) State of the Environment Report for London [online] available at: <http://data.london.gov.uk/documents/SOE-2011-report.pdf> (accessed 10/14)

- Brownfield sites should be prioritised and sites which offer the greatest capacity for development. Previously developed land (PDL) within Haringey accounts for approximately for 3% of London's total PDL area.
- The Greater London Authority had identified 29 PDL sites in Haringey, which cover 84.9ha of land. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL. In 2011/12, 100% of housing was built on PDL.

Flood risk and climate change

- According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced. There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences would be significant.
- Climate change effects increase the severity and frequency of the flood risk. The extent and frequency of surface water flooding would be increased across the borough. The standard of protection from river flooding is also reduced by climate change effects in some parts of the borough adjacent to the River Lea.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the Borough. Tottenham Hale is the most vulnerable ward, with more than 50% lying within Flood Zone 2.

Air quality

- The Borough suffers poor air quality primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park.
- There are no sites listed as producing emissions to air, although the Edmonton Solid Waste Incinerator is located just beyond the Borough's northeast boundary.

Noise

- There is no suitable baseline data available for this SA topic, however anecdotally concentrations of noise exist along transport corridors in the Borough.

Energy and carbon

- The Borough has adopted a target of reducing its CO2 emissions by 40% In line with the London Plan energy hierarchy. The population of Haringey is expected to increase during the plan period to 2050. If this growth occurs emissions are expected to increase.
- Haringey Annual Carbon Report explains the current situation in relation to a range of energy/carbon issues. A headline message is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%. This is consistent with London wide and national trends; London wide emissions have increased by 8% and UK emissions by 5.3%.
- It is also noted that in 2013 Haringey Council led a successful application to the Department of Energy and Climate Change for 'Green Deal Communities' funding, to deliver a programme that will reduce energy costs for households and businesses in Haringey, encourage eco-retrofit and drive sustainable economic growth.

Waste management

- The total amount of Municipal Solid Waste collected by Haringey in 2011 was 115,793 tonnes. 29% of the total was sent to landfill or 33,578 tonnes. Haringey has an overall capacity for waste management of approximately 104,800 tonnes per annum.
- The Borough achieves good recycling rates. There are two Reuse & Recycling Centres and these accept an increasing range of materials and items for reuse or recycling. Other

waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the Borough. The overall recycling and composting rate for the North London Waste Authority, including Haringey is 24%.

Sustainable transport

- Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes.
- Over half of Haringey households do not own a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car.
- Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider Borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital.
- Stronger orbital public transport capacity is required to serve key development areas and town centres. There is also a need for improved connectivity to key employment areas outside of the borough including Stratford, Brent Cross and Stansted Airport.

8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

The SA Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal.

8.1.1 Drawing on the review of the sustainability context and baseline, the Scoping Report (2012) was able to identify a list of key sustainability issues that should be a focus of SA. This list was then refined further into a concise list of key sustainability objectives for the Site Allocations DPD. These objectives (and the associated criteria) provide a methodological ‘framework’ for SA.

8.2 Sustainability objectives (the ‘SA framework’)

8.2.1 As discussed above, a key outcome of scoping work is a list of sustainability objectives that can be drawn upon as a methodological ‘framework’ for SA, i.e. can be used to guide the appraisal of significant effects on the baseline.

Table 8.1: The SA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Social		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> • Encourage safety by design? • Reduce levels of crime? • Reduce the fear of crime? • Reduce levels of antisocial behaviour?
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education for all members of society? • Improve the provision of and access to education and training facilities? • Ensure educational facilities are accessible to residential areas? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> • Improve access to health and social care services? • Prolong life expectancy and improve well-being? • Promote a network of quality, accessible open spaces? • Promote healthy lifestyles? • Provide good quality outdoor sports facilities and sites?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> • Reduce homelessness? • Increase the availability of affordable housing? • Improve the condition of Local Authority housing stock? • Improve the diversity of the housing stock? • Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character? • Create balanced communities of different affordable housing types, densities and tenures? • Create integrated, mixed-use tenure developments?
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> • Promote a sense of cultural identity, belonging and well-being? • Develop opportunities for community involvement? • Support strong relationships between people from different backgrounds and communities?
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> • Improve access to cultural and leisure facilities? • Maintain and improve access to essential services (banking, health, education) facilities?
Economic		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> • Retain existing local employment and create local employment opportunities? • Diversify employment opportunities? • Meet the needs of different sectors of the economy? • To facilitate new land and business development?
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> • Improve lifelong learning opportunities and work related training? • Reduce high levels of unemployment and worklessness? • Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> • Improve physical accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> • Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity at designated and non-designated sites? • Link and enhance habitats and wildlife corridors? • Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> • Promote townscape character and quality? • Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> • Promote a network of quality, accessible open spaces? • Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> • Preserve ground and surface water quality? • Conserve water resources? • Incorporate measures to reduce water consumption?
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> • Encourage the development and remediation of brownfield land? • Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> • Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> • Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> • Minimise the impact of the ambient noise environment?
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> • Minimise the use of energy? • Increase energy efficiency and support affordable warmth initiatives? • Increase the use of renewable energy? • Mitigate against the urban heat island effect? • Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> • Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? • Encourage the re-use of goods? • Reduce the production of waste? • Support the use of sustainable materials and construction methods? • Increase the proportion of waste recycling and composting across all sectors?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> • Improve the amenity and connectivity of walking and cycling routes? • Promote the use of public transport? • Reduce the use of the private car? • Encourage development in growth areas and town centres and reduce commuting?

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

9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

This part of the Report is yet to be completed.

Once complete, this part of the report will explain how 'informal consideration of alternatives' has fed-into development of the draft plan.

It will explain that further, detailed alternatives appraisal work will be undertaken subsequent to the current consultation (i.e. when preparing the proposed submission version of the plan) and invite readers to make suggestions regarding what should be the focus of alternatives appraisal, i.e. which sites (or areas) should be the focus of alternatives appraisal and, in each instance, what range of alternative uses / policy approaches should be appraised.

This part of the report will explain that the evidence points firmly to a preferred package of sites to be allocated, and hence there is no need to consider alternatives in this respect. The preferred site package in the Site Allocations DPD was established subsequent to a multi-stage process which did involve screening out some sites; however, there is very little room for maneuver given the broad spatial strategy set out within the adopted Strategy Policies DPD, and the challenging FALP housing/employment growth targets.

10

TBC

PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

11 INTRODUCTION (TO PART 3)

The report must include...

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

This part of the Report is yet to be completed.

Once complete, this part of the report will present an appraisal of the draft plan.

For each of the 21 sustainability topics (see the Introduction to Part 1, above), the appraisal will identify and evaluate the 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability issues and objectives identified through scoping (see Part 1) as a methodological framework. Recommendations will be made, which can be taken into account subsequent to the consultation (alongside consultation responses) when preparing the proposed submission version of the plan.

12 TBC

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

13

14 INTRODUCTION (TO PART 4)

The report must include...

- Measures envisaged concerning monitoring.

14.1.1 This part of the report explains next steps that will be taken as part of plan-making / SA.

15 PLAN FINALISATION

Publication

15.1.1 Subsequent to the current consultation it is the Council’s intention to prepare the final draft (‘proposed submission’) version of the plan for publication. This will be the version which the Council believes is ‘sound’ and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, representations made through the current consultation and also alternatives appraisal work.

15.1.2 **The SA Report** (as opposed to an *Interim SA Report*) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the Regulations. Table 15.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 15.1: Information contained within this Interim SA Report and the forthcoming SA Report

Part / SA Question	This Interim SA Report	The SA Report
Part 1: What’s the scope of the SA?	<ul style="list-style-type: none"> • The Scope of the SA; summarised as appropriate. 	
Part 2: What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> • A discussion of informal alternatives appraisal work that has been undertaken. 	<ul style="list-style-type: none"> • Outline reasons for having selected the sites/areas and alternatives that were (‘reasonably’) a focus of interim appraisal. • Interim appraisal findings. <ul style="list-style-type: none"> • i.e. appraisal findings from Part 3 of this report, plus findings from alternatives appraisal work that will be undertaken subsequent to the current consultation. • Outline reasons for having selected the preferred (proposed submission) approach in light of interim appraisal.
Part 3: What are the SA findings at this stage?	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan. 	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan.
Part 4: What are the next steps?	<ul style="list-style-type: none"> • A general discussion of what happens next. 	<ul style="list-style-type: none"> • A discussion of what happens next; and ‘measures envisaged concerning monitoring’

Submission / adoption

- 15.1.3 Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other sources of evidence) before determining whether the plan is sound (or requires further modifications).
- 15.1.4 Once found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *'the measures decided concerning monitoring'*.

Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	January 2014	Interim SA Report published alongside the draft Tottenham Area Action Plan	Doug McNab, Principal Planner Anthony Whitaker, Assistant Planner	Mark Fessey, Principal Consultant	Steve Smith, Technical Director

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

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Tottenham Area Action Plan (AAP). Once adopted, the AAP will assist the delivery and implementation of significant development proposals for the Tottenham Hale Growth Area, the Northumberland Park Area of Change and the Tottenham High Road/Bruce Grove Area of Change (including Tottenham Green).
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including ‘equalities’ and ‘health’ issues¹), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of the AAP is a legal requirement.²

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.³
- 2.1.2 In-line with the Regulations, a report (which we call **the SA Report**) must be published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **the SA Report must answer the following four questions:**
1. What’s the scope of the SA?
 - The scope must be established subsequent to a review of the sustainability context and baseline, and consultation with designated agencies.
 2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point ‘reasonable alternatives’ are appraised.
 3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?

3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a complete draft plan. Rather, the Council is consulting on an early draft plan. This Interim SA Report is produced with the intention of informing the consultation and subsequent preparation of the draft (‘proposed submission’) version of the plan.

Structure of this Interim SA Report

- 3.1.2 Despite this being an ‘Interim’ SA Report (i.e. a document that does not need to provide the information legally required of the SA Report) it is nonetheless helpful to structure this report according to the four questions listed above.

¹ As part of this SA process, explicit consideration is being given to ‘equalities’ and ‘health’ issues, and as such this SA process can be said to be integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). More on the SA scope – i.e. the scope of issues that are a focus of SA – is explained in ‘Part 1’ of this Report.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that Local Planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012).

³ Directive 2001/42/EC

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the ‘scope’ of the SA. In particular, and as required by the Regulations⁴, this Part of the SA Report answers the following questions.

- What’s the Plan seeking to achieve?
- What’s the sustainability ‘context’?
- What’s the sustainability ‘baseline’?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 21 broad sustainability topics:

	Broad sustainability topics	
Social	<ul style="list-style-type: none"> • Crime • Education • Health 	<ul style="list-style-type: none"> • Housing • Community Cohesion • Accessibility
Economic	<ul style="list-style-type: none"> • Economic Growth • Skills and Training 	<ul style="list-style-type: none"> • Economic Inclusion • Town Centres
Environmental	<ul style="list-style-type: none"> • Biodiversity • Townscape and Cultural Heritage • Open Space • Water Resources • Soil and Land Quality • Flood Risk and Climate Change 	<ul style="list-style-type: none"> • Air Quality • Noise • Energy and Carbon • Waste Management • Sustainable Transport

4.2 Consultation on the scope

4.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the [SA] Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans”*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁵

4.2.2 As such, an SA Scoping Report was published for consultation in January 2012. In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council’s consultation database. Subsequent to consultation the SA scope was updated.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

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

4.3 A note on ‘equalities’ and ‘health’ considerations

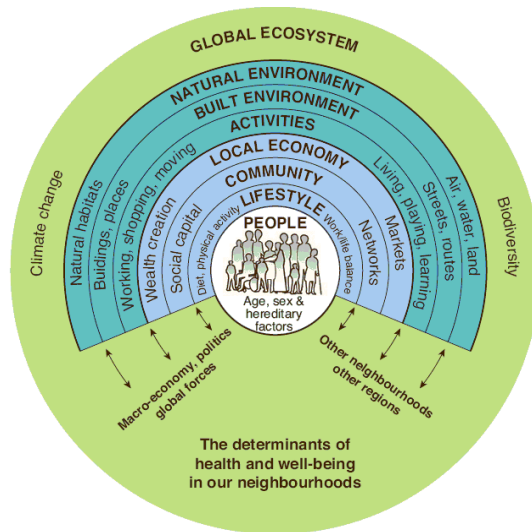
4.3.1 Equality and health considerations (‘issues’) were a focus of scoping work undertaken in late 2013 (when preparing the Scoping Report for consultation) and have also been given further consideration when updating / supplementing the SA scope in 2014 (subsequent to the Scoping Report consultation).

4.3.2 As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence **the SA process ‘integrates’ Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).**

Box 4.1: EqIA and HIA

The Council is not required to undertake **EqIA**, but does have a duty to give "due regard" to promoting equality of opportunity for all protected groups when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected groups’ are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

With regards to **HIA**, this are no requirements on the Council, although the NPPF requires planners to promote healthy communities and use evidence to assess health and wellbeing needs; and additionally, the GLA and the Mayor are required to ‘have regard to health’ in preparing strategies at the London-scale. It is important to understand that HIA is to a large extent about giving consideration to the wider *determinants of health*, including those related to the quality of the natural and built environment, people’s daily activities and lifestyles, and local communities and the economy.



Barton & Grant (2006)

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes.

5.1.1 The Tottenham AAP, once adopted, will assist the implementation of significant development proposals for the Tottenham Hale Growth Area, the Northumberland Park Area of Change and the Tottenham High Road/Bruce Grove Area of Change (including Tottenham Green).

5.1.2 More specifically, the objective of the Tottenham AAP is to help deliver:

- More than 10,000 new high quality homes;
- Over 5,000 new jobs created or accessed with almost a million square feet of employment and commercial space added;
- A new district centre at Tottenham Hale;
- A new civic hub and open space at Tottenham Green and a new gateway to Seven Sisters;
- A reinvigorated and enhanced high street at Bruce Grove;
- A new leisure destination at High Road West;
- The long term regeneration of Northumberland Park Estate; and
- An enhanced movement network across Tottenham that encourages a modal shift away from the car and improved linkages to Lee Valley Park.

5.1.3 The main influences on plan preparation are the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must adhere to; and the Haringey Core Strategy Strategic Policies (2013) and London Plan (2011). The Site Allocations DPD is also developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011.

5.2 What's the plan not seeking to achieve?

5.2.1 The AAP is an aid to delivery and implementation of the priorities and proposals set out in London Plan and Core Strategy Strategic Policies DPD, and is therefore unable to change the overall location or scale of development. The AAP has value in that it can set the parameters for co-ordinated land assembly and proactive planning through compulsory purchase and planning policies which are responsive to the local area. It can also help to modify existing planning designations such as employment land and town centre designations which may be required to unlock the full potential of a place undergoing transformational change.

5.2.2 At the same time, the plan will be strategic in nature in that it will omit consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process).

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 This chapter introduces key sustainability context messages in relation to broad problems/issues and objectives. The source of context messages includes:

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), which constitutes the Government's view of what sustainable development in England means in practice for the planning system;
- Other Government reports; and
- Reports prepared by other (e.g. third sector) organisations.

6.1.2 Presented below is an updated summary of the context review presented in the Scoping Report (2012).

6.2 Social

Crime

- The NPPF calls on planning authorities to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life. It notes that measures to design out crime should be integral.
- The 'Haringey Community Safety Strategy 2013-2017' notes that following the riots in 2011, it was recommended that the Borough strengthen efforts to seek investment in economic growth, jobs, high quality housing and improved engagement with the communities affected.

Education

- The NPPF notes that providing a 'sufficient choice of school places is of 'great importance' and there is a need on the part of planning authorities to take a 'proactive, positive and collaborative approach' towards achieving this.
- According to the London Plan, the Mayor will support the provision of education facilities in order to meet the demand generated by London's growth.

Health

- The NPPF calls for the setting strategic policies to ensure the provision of health facilities. In terms of the wider determinants of health, it notes that access to high quality open spaces and sport and recreation can make an important contribution.
- The 'Marmot Review' concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked'. The 'Haringey Health and Wellbeing Strategy 2012-2015' endorses the findings of the Marmot review in terms of the need to 'ensure social justice, health and sustainability are at the heart of all policies'.
- The report 'Ready for Ageing?' warns that society is underprepared for the ageing population. Meanwhile, the study 'Under the Weather' finds that heat related illness is

liable to increase under climate change, but that this could be addressed through appropriate urban planning.

- At a local level, Haringey Council recently published for consultation a draft Corporate Plan, 'Building a Stronger Haringey Together'. One of the draft priorities is: "Empower all adults to live healthy, long and fulfilling lives."

Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible, including where housing market areas cross administrative boundaries. The NPPF also notes that:
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - Good design is a key aspect in sustainable development.
 - Authorities should ensure provision of affordable housing
 - Larger developments are sometimes the best means of achieving new homes.
- Each of London's Boroughs are required to fulfil the housing targets as set out in the London Plan, and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality.
- 'Haringey's Housing Strategy 2009-19' sets out Haringey's approach to housing over the next ten years. It includes a vision to create 'neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations'. In October 2014, the Council published for public consultation a new Housing Strategy 2015-2020.

Community cohesion

- The NPPF states that a planning principle is to support strategies to improve health, social and cultural wellbeing for all. There is a need to facilitate social interaction and promote the retention and development of community services and facilities.
- The report Natural Solutions notes that green spaces potentially have a role to play in increasing community cohesion by providing a neutral space for meeting and interacting.
- In the Haringey 'Sustainable Community Strategy 2007-2016' an ambition is set out to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.

Accessibility

- The NPPF notes that the planning system has a role to play in providing accessible local services that reflect community needs and support health, social and cultural well-being.
- The London Plan states that development should provide and improve access to social and community infrastructure. Inclusive design should also be adopted to take into account the needs of older and disabled people.
- The Haringey 'Sustainable Community Strategy 2007-2016' looks to ensure that the Borough's communities have easier access to open spaces, facilities and shopping areas.

6.3

Economic

Economic growth

- The European Union strategy for achieving economic growth up until 2020 focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth.

- According to the NPPF, the planning system can contribute to a responsive economy by ensuring sufficient land of the right type is available in the right places and at the right time; and by identifying and coordinating development requirements. It emphasises the need to:
 - Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
 - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- The Mayor's Economic Development Strategy sets an ambition for London to be the world capital of business, and to have the most competitive business environment in the world.
- The Haringey Regeneration Strategy sets out a key priority to develop a 21st century business economy that offers opportunities for sustainable employment and enterprise, to help make Haringey a place people want to work, visit and invest in.

Skills and training

- The Haringey 'Sustainable Community Strategy 2007-2016' sets an objective to extend training opportunities for people to improve their skills, especially in order to have access to jobs in key areas of commerce and growth.
- The Haringey Regeneration Strategy sets out a key priority to unlock the potential of Haringey residents through increasing skill levels and raising employment so that they can contribute to and benefit from being part of one of the most successful cities in the world.

Economic inclusion

- The London Plan notes that there is a need to tackle persistent poverty and deprivation through a policy framework that helps tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need.
- The Local Growth White Paper notes that growth should be broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings.
- The Haringey 'Sustainable Community Strategy 2007-2016' sets an ambition to target poverty through targeted social inclusion initiatives.

Town centres

- The NPPF emphasises the need to support competitive town centres, and oppose schemes that will impact town centre viability. It calls for town centres to provide a diverse retail offer and to reflect local 'individuality'.
- CLG's (2012) report 'High streets at the heart of our communities' notes that local policies should look to reinforce local distinctiveness and community value of town centres, and develop their social function with a view to underpinning ongoing commercial viability.
- The London Plan calls for the scale of new retail, commercial, culture and leisure developments within town centres to reflect the size, role and function of that centre.

6.4

Environmental

Biodiversity

- The NPPF emphasises the need to protect important sites, plan for green infrastructure and plan for ecological networks whilst taking account the anticipated effects of climate change. National policy reflects the EU Biodiversity Strategy's commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- The Natural Environment White Paper sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and well-being. It signals a move towards protecting biodiversity throughout the landscape.

- The London Plan states calls for priority to be given to achieving Biodiversity Action Plans (BAP) targets and supporting sites within or near to areas deficient in accessible wildlife sites. The Haringey BAP notes that there is a need to consider biodiversity as a cross cutting agenda to be integrated into the delivery of all services.

Townscape and cultural heritage

- The NPPF calls for a 'positive strategy' towards the 'conservation and enjoyment of the historic environment', including assets most at risk. Heritage assets should be recognised as an 'irreplaceable resource' to be conserved in a 'manner appropriate to their significance'.
- The London Plan calls for Local Authorities to maintain and enhance the contribution of the cities 'built, landscaped and buried heritage' to London's environment, culture, and economy.
- English Heritage's 'Heritage at Risk National Strategy' targets the removal of a quarter of nationally designated heritage at risk assets by April 2015. Meanwhile, 'Seeing history in the view' provides a means of understanding views that are recognised as important.

Open space

- The NPPF recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.
- The London Plan states that boroughs should plan for green infrastructure needs to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.
- Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments.

Water resources

- The EU Water Framework Directive drives a catchment-based approach to water management. An Environment Agency strategy implements Directive in relation to groundwater, highlighting that groundwater is at risk from point source and diffuse pollution.
- The NPPF calls for planning authorities to produce strategic policies to deliver the infrastructure necessary for water supply and wastewater and to take account of the effects of climate change in the long term, including on water supply.
- The 'Water White Paper' notes that through measures to encourage and incentivise water efficiency (and demand management measures by water companies), the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- An Environment Agency strategy for restoring rivers in North London considers how rivers play a role in urban regeneration, providing a range of social and environmental benefits.

Soil and land quality

- The NPPF recognises the need to protect and enhance soils; prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil pollution or land instability; and remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.

- The NPPF also highlights the need to encourage the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value.
- The 'Safeguarding our Soils' strategy highlights the vital role soils play in supporting ecosystems, facilitating drainage and providing urban green spaces for communities.

Flood risk and climate change

- The EU's 'Blueprint to Safeguard Europe's Water Resources' promotes the use of green infrastructure, such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts.
- The NPPF notes that development should be directed away from areas at highest risk from flooding. Where development is necessary, it should be made safe without increasing risk elsewhere. New developments should be planned to avoid vulnerability to climate change.
- The 'Flood and Water Management Act' calls for the incorporation of greater resilience measures into new buildings, retro-fitting at risk properties, and utilising the environment to address risk (e.g. harnessing wetlands to store water). 'Planning for SuDS' calls for greater recognition of the multiple benefits this form of water management can provide.

Air quality

- The EU Thematic Strategy on Air Pollution aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).
- According to the NPPF, plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas. New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.
- The Mayor's Air Quality Strategy notes that air pollution harms the environment and health, with greater impacts felt most severely by vulnerable people, such as children and the elderly. The London Plan seeks to ensure that development is at least 'air quality neutral'.

Noise

- The NPPF states that planning policies should aim to avoid noise that gives rise to significant adverse impacts on health and quality of life.
- The Mayor's Ambient Noise Strategy focuses on reducing noise through better management of transport systems, better town planning, and better design of buildings.

Energy and carbon

- On energy, the European Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008⁶. Plan-making should, for example, support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment
- The London Plan seeks to reduce London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. Haringey Council has set an ambitious target to reduce borough-wide carbon emissions by 40% by 2020 from a 2005 baseline.

⁶ In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.

Waste management

- The Mayor's municipal waste management strategy aims provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste, including minimising its impact on the environment and unlocking its economic value.
- The seven north London boroughs are preparing a joint Waste Plan. This plan will identify a range of suitable sites for waste management uses, to meet London Plan waste apportionments, and include policies and guidelines for determining planning applications.

Sustainable transport

- The NPPF states that the transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport). To minimise journey lengths planning policies should aim for 'a balance of land uses', and where practical, key facilities should be located within walking distance or be well served by public transport.
- Haringey encourages 'sustainable' forms of transport through measures including the Haringey Walking Plan, Cycling Action Plan and Haringey Cycle Route Network.

7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The SA Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan;
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through the context review so that they are locally specific. Once the baseline has been established it can be used as a 'benchmark' against which to assess effects.

7.1.2 Presented below is an updated summary of the baseline review presented in the Scoping Report (2014). A more comprehensive (and fully referenced) review can be found within the SA Scoping Report.

7.2 Social

Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others. There are 52 neighbourhood crimes per 1,000 population in Tottenham, compared to 49.3 for Haringey.
- Crime is high in Tottenham compared to Haringey as a whole. Significant criminal activities in the ward include theft and handling and violence against the person.
- Crime is particularly prevalent in Northumberland Park. The challenge facing Tottenham, and the borough as a whole, is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is above the London average (8.6%), but below the national level (9.3%). This is most acute in Tottenham Hale, with 22.45% of residents aged 16 and over having no qualifications.
- In 2013, 69% of the pupils who live and study in the Tottenham area achieved level 4+ at Key Stage 2, compared to 79% in London. This reduced to 56.4% in St Ann's. In 2013, 57% of pupils achieved 5 or more A*-C at GCSE level, compared to 64.5% in London. This reduces to 50% in Seven Sisters.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. None of the schools in Tottenham have sixth forms which may indicate low expectations in the young people of Tottenham.

- Tottenham does have outstanding rated schools and the primary school teacher of the year teaches in the area, but educational attainment is still below London levels. Educational attainment is significantly lower than the London average across Haringey and is lowest in White Hart Lane, Northumberland Park and Seven Sisters (all in Tottenham).
- As the population grows additional school places will need to be created.

Health

- Health and well-being in Haringey is very similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further. However Tottenham has a lower life expectancy to London with it being only 74.7 years for men and 81.8 years for women in 2006 to 2010.
- Health inequalities in Haringey are evident; the most deprived areas in the east of the borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the borough. Male life expectancy is low compared to the Haringey average.
- Childhood obesity rates in the borough are higher than the London and national average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. In Tottenham this is even worse with 44.9% of 10-11 year olds in 2012/13 being either overweight or obese. About 112,865 adults in Haringey are estimated to be overweight or obese.
- There are high levels of deaths attributed to external causes and respiratory disease in Tottenham compared to Haringey. Cancer and cardiovascular disease rates amongst the under 75s are also high (17% and 35% above expected rates).
- There are a limited number of GP practices in some wards in Tottenham (White Hart Land and West green) and patients are likely to access primary care elsewhere. Access to GPs in Tottenham is significantly poorer in than in other parts of Haringey and the level of planned growth in Tottenham means a need for development of more health infrastructure.

Housing

- Affordability of housing is a significant issue in the area. The borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The borough has notable levels of homelessness, with 3,000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the borough (which is more densely populated than the west).
- Overcrowding is a major issue with a fifth of all households with at least one bedroom too few for the number and composition of people living in the household. This increases to a quarter of all households in Northumberland Park.
- At just £25,138 per year, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average annual household income for London.
- Tottenham has a population of 118,337 (2012 mid year estimate) which is projected to grow to approximately 147,000 by 2041. The area has a population density of 100.2 persons per hectare (2011), compared to 86.2 for Haringey and 54 for London as a whole. The borough's population is set to increase by 31,234 over the period 2011 to 2021.

Community cohesion

- The 2011 Census showed that Haringey's population increased by 18% between 2001 and 2011. In Tottenham the population is currently 118,337, set to rise to 147,409 by 2014 according to the GLA Population Projections.
- Tottenham has a higher proportion of under 20s (28.1%) than Haringey (25.6%) and London as a whole (24.5%), suggesting an increased need for services aimed at mothers, children and young people. The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey in future.
- Tottenham is one of the most ethnically diverse areas in the country. A higher than average proportion of residents are from ethnic backgrounds; most notably Black Caribbean, Black African and Other White. Over three quarters (78.9%) of the population have non White British ethnic group, compared to 55.1% for London. There are some 200 different languages spoken.
- Overall deprivation in the borough is high, with Haringey ranked as the fourth most deprived borough in London. The eight wards that make up Tottenham (Northumberland Park, Tottenham Hale, Tottenham Green, White Hart Lane, West Green, Seven Sisters, St. Ann's and Bruce Grove) accommodate almost half of the people living in Haringey. They are ranked among the top 10% of the most deprived areas in England.

Accessibility

- Education is highly accessible, with all 5-10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and all 16-19 year olds within 30 minutes of further education.

7.3

Economic

Economic growth

- When it is compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. Low wages act as a barrier to home ownership and limit residents' housing options.
- Through the London Plan, Tottenham has two regionally strategic industrial locations, one of which is a preferred industrial location (Central Leaside Business Area – North Tottenham) and the other an industrial business park located in Tottenham Hale. The regeneration of Tottenham Hale and the industrial areas in Central Leaside⁷ offer new business and employment opportunities.
- For long periods Tottenham provided a home to light industry along the Upper Lee Valley but despite a number of active and well used industrial estates it now has, in broad terms, a declining employment base.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 people or less. Tottenham has the highest start-up rate of new businesses in London, despite the recent recession. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. Business stakeholders have expressed concern about the range of business premises available in the borough.
- Research has indicated that economic growth within Tottenham will come primarily from small and medium sized B1 businesses, the creative sector and retail and leisure opportunities unlocked by the area's regeneration plans.

⁷ The regeneration area of Central Leaside is also partly in the London Borough of Enfield.

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles⁸ (55.4%) across Haringey were higher than the London average (54.6%) and significantly above the national average (44.5%). The percentage of the borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The borough is characterised by its polarised skills base. Around 21% of the borough's working age population has a Level 1 or below qualification. Meanwhile, 40% have a Level 4 or above qualification.
- A high proportion of Tottenham residents are employed in low level jobs or are receiving benefits.

Economic inclusion

- Tottenham has some of the highest levels of unemployment in London and England. In 2011, 63.7% of 16-64 year olds in Tottenham were in employment, below both the London and national rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64 year olds). This is significantly above the national and London rates.
- Youth unemployment in Tottenham is particularly an issue with 5.4% of 18-24 year olds in the area claiming JSA, increasing to nearly 10% in Northumberland Park.
- High levels of unemployment and deprivation, along with a number of other factors, caused riots in Tottenham in the summer of 2011. This has led to a number of discussions on the prospects for the area's young population and in turn has triggered investment from the borough and the Mayor of London.
- In 2012/13 the median household annual income in Tottenham was £21,834, substantially below both Haringey (£33,140) and London (£35,740).

Town centres

- Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The scale of the High Road has to a large part been an obstacle to creating a cohesive and distinctive High Street experience.
- It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the borough to fulfil their role and function. However Tottenham Hale was the best performing of Haringey's town centres with no vacant town centre floor space.
- Haringey's town centre vacancy rates have increased in recent years but overall, they remain lower than national and regional averages. However, the borough's town centres are not performing equally in this respect.
- Tottenham's town centres need to be maintained and enhanced to retain retail capacity. Additional shopping and service facilities are needed in order to meet projected growth in expenditure.

⁸ Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

7.4 Environmental

Biodiversity

- Three European Sites are within a 10 km radius of Haringey – Lee Valley Ramsar Site, Lee Valley Special Protection Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- The Borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance. Of these, five are of Metropolitan Importance, 22 of Borough Importance Grade I and Borough Grade II and 33 of Local Importance. Haringey also has five Local Nature Reserves (LNRs) - Alexandra Palace & Park, Coldfall Wood, Parkland Walk, Railway Fields and Queens Wood. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced.
- The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem. This area is home to European designated sites and is a Site of Special Scientific Interest. The River Lee Navigation and Pymee's Brook waterways also offer a habitat for wildlife. There are no designated Sites of Importance for Nature Conservation in Tottenham and much of the area generally lacks access to the natural environment.

Townscape and cultural heritage

- The Tottenham High Road Historic Corridor comprises the following six Conservation Areas: North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green and South Tottenham. There are also three other Conservation Areas: Bruce Castle, St Ann's and Clyde Circus⁹. Tottenham also includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas.
- The North Tottenham Conservation Area is identified on English Heritage's Heritage at Risk Register as a conservation area at risk.

Open space

- Tottenham has a small number of significant green spaces such as Down Lane Park and the Lee Valley Regional Park (designated as Green Belt) on the eastern boundary, although access is a significant problem. The borough has an overall provision of 1.7ha of open space per 1,000 residents. Areas deficient in access to public open space include Northumberland Park and Tottenham Hale wards and parts of Bruce Grove, Tottenham Green and Seven Sisters wards.

Water resources

- Tottenham is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment. The modification of rivers including in-stream structures and culverts has led to loss of habitat diversity and the creation of barriers for fish migration.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area. Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- Haringey is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance

⁹ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.

- Haringey-specific data is not available for water consumption however at the London level¹⁰ the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

Soil and land quality

- A variety of industrial land uses have left behind substantial contamination in the borough, which may need to be remediated before development. The Borough's Contaminated Land Strategy identified potentially contaminated sites in the borough.
- Brownfield sites should be prioritised and sites which offer the greatest capacity for development. Previously developed land (PDL) within Haringey accounts for approximately for 3% of London's total PDL area.
- The Greater London Authority had identified 29 PDL sites in Haringey, which cover 84.9ha of land. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL. In 2011/12, 100% of housing was built on PDL.

Flood risk and climate change

- According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced. There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences would be significant.
- Climate change effects increase the severity and frequency of the flood risk. The extent and frequency of surface water flooding would be increased across the borough. The standard of protection from river flooding is also reduced by climate change effects in some parts of the borough adjacent to the River Lea.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the Borough. Tottenham Hale is the most vulnerable ward, with more than 50% lying within Flood Zone 2.

Air quality

- The borough suffers poor air quality primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park.
- There are no sites listed as producing emissions to air, although the Edmonton Solid Waste Incinerator is located just beyond the borough's north-east boundary.

Noise

- There is no suitable baseline data available for this SA topic, however anecdotally concentrations of noise exist along transport corridors in the Borough.

Energy and carbon

- The Borough has adopted a target of reducing its CO₂ emissions by 40% In line with the London Plan energy hierarchy. The population of Haringey is expected to increase during the plan period to 2050. If this growth occurs emissions are expected to increase.

¹⁰ Environment Agency (2013) State of the Environment Report for London [online] available at: <http://data.london.gov.uk/documents/SOE-2011-report.pdf> (accessed 10/14)

- Haringey Annual Carbon Report explains the current situation in relation to a range of energy/carbon issues. A headline message is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%. This is consistent with London wide and national trends; London wide emissions have increased by 8% and UK emissions by 5.3%.
- It is also noted that in 2013 Haringey Council led a successful application to the Department of Energy and Climate Change for 'Green Deal Communities' funding, to deliver a programme that will reduce energy costs for households and businesses in Haringey, encourage eco-retrofit and drive sustainable economic growth.

Waste management

- The total amount of Municipal Solid Waste collected by Haringey in 2011 was 115,793 tonnes. 29% of the total was sent to landfill or 33,578 tonnes. Haringey has an overall capacity for waste management of approximately 104,800 tonnes per annum.
- The Borough achieves good recycling rates. There are two Reuse & Recycling Centres and these accept an increasing range of materials and items for reuse or recycling. Other waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the Borough. The overall recycling and composting rate for the North London Waste Authority, including Haringey is 24%.

Sustainable transport

- Tottenham has some of north London's best transport links with it only being 12 minutes on the tube (Victoria line) or train to central London. This is coupled with express rail services to Stratford, the City, Stansted Airport and Cambridge
- Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital.
- Stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas. Transport links need to be improved to major employment opportunity areas outside of the borough including Stratford, Brent Cross and Stansted Airport.
- Transport for London has invested £20m into a major redevelopment of Tottenham Hale Tube, rail and bus station.
- Investment is also committed for £90 million for the Gospel Oak – Barking London Overground Line providing capacity and frequency improvements to south Tottenham, and £40 million for road improvements to unlock development sites near Tottenham Hale by dismantling the one-way gyratory system.
- Over half of Haringey households do not own or have access to a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car.
- Tottenham's main road network is often congested with high flows of traffic on the A10 and A1010. Local resident streets are frequently heavily parked.
- Currently cycling only forms 2% of all journeys. Haringey has a target for a modal share by cycling of 5% by 2026. A local cycle route network including Quietways has been developed and Cycle Superhighway 1 runs through the area but more infrastructure is needed.

8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

The SA Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal.

8.1.1 Drawing on the review of the sustainability context and baseline, the Scoping Report (2012) was able to identify a list of key sustainability issues that should be a focus of SA. This list was then refined further into a concise list of key sustainability objectives for the Tottenham AAP. These objectives (and the associated criteria) provide a methodological ‘framework’ for SA.

8.2 Sustainability objectives (the ‘SA framework’)

8.2.1 As discussed above, a key outcome of scoping work is a list of sustainability objectives that can be drawn upon as a methodological ‘framework’ for SA, i.e. can be used to guide the appraisal of significant effects on the baseline.

Table 8.1: The SA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Social		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> • Encourage safety by design? • Reduce levels of crime? • Reduce the fear of crime? • Reduce levels of antisocial behaviour?
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education for all members of society? • Improve the provision of and access to education and training facilities? • Ensure educational facilities are accessible to residential areas? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> • Improve access to health and social care services? • Prolong life expectancy and improve well-being? • Promote a network of quality, accessible open spaces? • Promote healthy lifestyles? • Provide good quality outdoor sports facilities and sites?
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> • Reduce homelessness? • Increase the availability of affordable housing? • Improve the condition of Local Authority housing stock? • Improve the diversity of the housing stock? • Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character? • Create balanced communities of different affordable housing types, densities and tenures? • Create integrated, mixed-use tenure developments?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> Promote a sense of cultural identity, belonging and well-being? Develop opportunities for community involvement? Support strong relationships between people from different backgrounds and communities?
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> Improve access to cultural and leisure facilities? Maintain and improve access to essential services (banking, health, education) facilities?
Economic		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> Retain existing local employment and create local employment opportunities? Diversify employment opportunities? Meet the needs of different sectors of the economy? To facilitate new land and business development?
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> Improve lifelong learning opportunities and work related training? Reduce high levels of unemployment and worklessness? Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> Improve physical accessibility to local and London-wide jobs? Support flexible working patterns? Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> Enhance the environmental quality of the borough's town centres? Promote the borough's town centres as a place to live, work and visit? Ensure that the borough's town centres are easily accessible and meet local needs and requirements? Promote high quality buildings and public realm?
Environmental		
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> Protect and enhance biodiversity at designated and non-designated sites? Link and enhance habitats and wildlife corridors? Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> Promote townscape character and quality? Preserve or enhance buildings and areas of architectural and historic interest?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> Promote a network of quality, accessible open spaces? Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> Preserve ground and surface water quality? Conserve water resources? Incorporate measures to reduce water consumption?
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> Encourage the development and remediation of brownfield land? Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> Reduce and manage flood risk from all sources? Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> Manage air quality within the borough? Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> Minimise the impact of the ambient noise environment?
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> Minimise the use of energy? Increase energy efficiency and support affordable warmth initiatives? Increase the use of renewable energy? Mitigate against the urban heat island effect? Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? Encourage the re-use of goods? Reduce the production of waste? Support the use of sustainable materials and construction methods? Increase the proportion of waste recycling and composting across all sectors?
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> Improve the amenity and connectivity of walking and cycling routes? Promote the use of public transport? Reduce the use of the private car? Encourage development in growth areas and town centres and reduce commuting?

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

9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

This part of the Report is yet to be completed.

Once complete, this part of the report will explain how preparation of the draft plan has been informed by appraisal of alternatives for a range of policy areas / issues (to include the overarching spatial strategy).

Specifically, for each issue / set of alternatives the following questions will be answered -

- What are the reasons for focusing appraisal on this issue / set of alternatives?
- What are the appraisal findings (in relation to the set of alternatives in question)?
- What are the Council's reasons for selecting the preferred approach in-light of the appraisal findings?

10 TBC

PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

11 INTRODUCTION (TO PART 3)

The report must include...

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

This part of the Report is yet to be completed.

Once complete, this part of the report will present an appraisal of the draft plan.

For each of the 21 sustainability topics (see the Introduction to Part 1, above), the appraisal will identify and evaluate the 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability issues and objectives identified through scoping (see Part 1) as a methodological framework. Recommendations will be made, which can be taken into account subsequent to the consultation (alongside consultation responses) when preparing the proposed submission version of the plan.

12 TBC

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

13

23 INTRODUCTION (TO PART 4)

The report must include...

- Measures envisaged concerning monitoring.

Publication

23.1.1 Subsequent to the current consultation it is the Council's intention to prepare the final draft ('proposed submission') version of the plan for publication. This will be the version which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, representations made through the current consultation and also alternatives appraisal work.

23.1.2 **The SA Report** (as opposed to an *Interim* SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the Regulations. Table 23.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 23.1: Information contained within this Interim SA Report and the forthcoming SA Report

Part / SA Question	This Interim SA Report	The SA Report
Part 1: What's the scope of the SA?	<ul style="list-style-type: none"> • The Scope of the SA; summarised as appropriate. 	
Part 2: What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of appraisal. • Alternatives appraisal findings. • Reasons for having selected the preferred (proposed submission) approach in light of alternatives appraisal. 	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of interim appraisal. • Interim appraisal findings. <ul style="list-style-type: none"> • i.e. alternatives appraisal findings and appraisal findings from Part 3 of this report. • Reasons for having selected the preferred (proposed submission) approach in light of interim appraisal.
Part 3: What are the SA findings at this stage?	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan. 	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan.
Part 4: What are the next steps?	<ul style="list-style-type: none"> • A general discussion of what happens next. 	<ul style="list-style-type: none"> • A discussion of what happens next; and 'measures envisaged concerning monitoring'

Submission / adoption

- 23.1.3 Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other sources of evidence) before determining whether the plan is sound (or requires further modifications).
- 23.1.4 Once found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.