Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Oct 2014	Non-technical summary of four reports: 1) The Strategic Policies Partial Review SA Report 2) The Site Allocations DPD SA Report 3) The DM Policies DPD SA Report 4) The Tottenham AAP SA Report	Mark Fessey Principal Consultant		

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INTRODUCTION

AECOM (formally URS) is commissioned by London Borough of Haringey ('the Council') to undertake Sustainability Appraisal (SA) in support of four emerging plans:

- The Strategic Policies Alterations (or 'Partial Review');

- The Site Allocations Development Plan Document (DPD);

- The Development Management (DM) Policies DPD; and

- The Tottenham Area Action Plan (AAP).

SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives with a view to avoiding and mitigating adverse effects and maximising the positives. SA for each plan is a legal requirement, stemming from the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, draft ('proposed submission') versions of each plan are out for consultation; and each has an 'SA Report' published alongside, with a view to ensuring an informed consultation (and informed plan-making subsequent to the consultation).

This is a Non-technical Summary (NTS) of the SA Reports. It is the intention of that this NTS should act as a 'window' into *all four* SA Reports.

Structure of the SA Reports / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?

    - i.e. in the run-up to preparing the draft plan for consultation.

2. What are the appraisal findings and recommendations at this current stage?

    - i.e. in relation to the draft plan.

3. What are the next steps?

Each of these questions is answered in turn below, for each of the four plans. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SA?'

What's the scope of the SA?

[Insert a summary of the SA scope, including by presenting the 'SA framework', i.e. the list of sustainability issues and objectives established subsequent to 'context' and 'baseline' review]

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

An important element of the required SA process involves appraising 'reasonable alternatives' in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, 'Part 1' of each of the four SA Reports presents information on 'reasonable alternatives, with a view to answering the question: *What has plan-making / SA involved up to this point?'*

The approach that has been taken to alternatives appraisal is notably different across the four plans. This reflects the fact that the aims and objectives of the plans are individually distinct (albeit they all share the aim of delivering on the vision and broad strategy set out in Haringey's adopted Strategic Policies, a fact that is also reflected in the approach taken to alternatives appraisal).

Each plan / Interim SA Report is considered in turn below.

The Strategic Policies Partial Review

Part 1 of the Interim SA Report explains how…

[Insert discussion of the alternatives appraisal work undertaken, and the Council's response]

The Site Allocations DPD

Part 1 of the Interim SA Report explains how…

[Insert discussion of the alternatives appraisal work undertaken, and the Council's response]

The DM Policies DPD

Part 1 of the Interim SA Report explains how…

[Insert discussion of the alternatives appraisal work undertaken, and the Council's response]

The Tottenham AAP

Part 1 of the Interim SA Report explains how…

[Insert discussion of the alternatives appraisal work undertaken, and the Council's response]

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

'Part 2' within each of the SA Reports answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the draft plan as it stands at the current time, i.e. as presented within the proposed submission document.

In each case the appraisal of the draft plan is presented under 21 topic headings, and then a final section presents 'overall conclusions'. The overall conclusions in relation to each plan are presented below.

The Strategic Policies Alterations

The conclusion of the draft plan ('preferred option') appraisal is as follows -

[Insert conclusion]

The Site Allocations DPD

The conclusion of the draft plan ('preferred option') appraisal is as follows -

[Insert conclusion]

The DM Policies DPD

The conclusion of the draft plan ('preferred option') appraisal is as follows –

[Insert conclusion]

The Tottenham AAP

The conclusion of the draft plan ('proposed alterations') appraisal is as follows –

[Insert conclusion]

WHAT ARE THE NEXT STEPS?

For each of the four plans:

- 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.

- 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	Oct 2015	SA Report published alongside the proposed submission version of the Strategic Policies Partial Review	Mark Fessey, Principal Consultant		

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INTRODUCTION

1   BACKGROUND

1.1.1   AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of Alterations to the Strategic Policies Development Plan Document (DPD); henceforth 'the Strategic Policies Partial Review'. The purpose of the Strategic Policies DPD – which was adopted in its original form in 2013 - is to set out a long term vision of how Haringey should develop to 2026 and set out the Council's strategy for achieving that vision, with broad locations identified for housing, employment and other uses.

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' issues[1]), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs 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 and Programmes 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 (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[4] The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3   More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point?**

    – Including with regards to consideration of 'reasonable alternatives'.

2. What are the SA findings **at this stage?**

    – i.e. in relation to the draft plan.

3. What happens **next?**

    – What steps will be taken to finalise the plan?

    – What measures are proposed to monitor plan implementation?

2.1.4   These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. **Appendix I** makes the links between the ten Schedule 2 requirements and the three SA questions.

2.2   This SA Report

2.2.1   This document is the SA Report for the Strategic Policies Partial Review, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

2.2.2   Before answering Question 1, however, there is a need to set the scene further within this 'Introduction' by answering two initial questions.

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[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 Chapter 4.

[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

[4] Regulation 12(2)
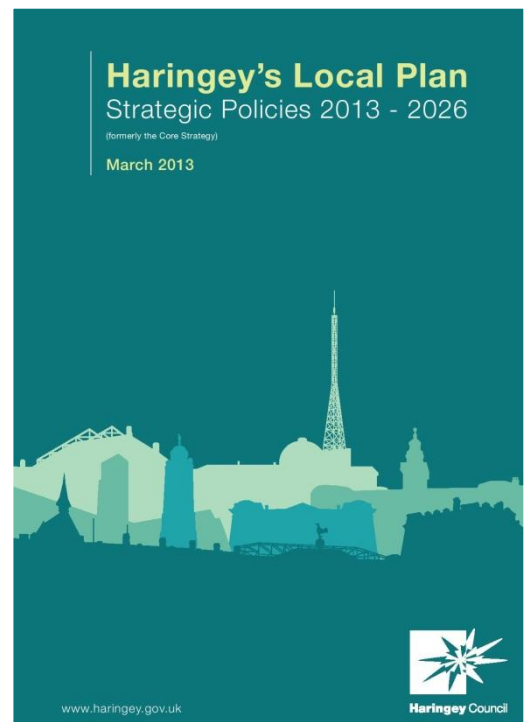
3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 The purpose of the Strategic Policies DPD – once adopted in its revised form – will be 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 will identify broad locations for delivering housing and achieving other strategic development needs around employment, retail, leisure, community facilities and other uses.

3.1.2 The Strategic Policies DPD was adopted in its original form in 2013, and at the current time a **Partial Review** is being prepared, with the Council currently consulting on a 'Proposed Alterations' consultation document. 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; London Plan (2011) and Further Alterations to the London Plan (FALP, 2014), which establishes housing and employment targets for Haringey; and the adopted Strategic Policies DPD (2013). The Partial Review is also being 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.

Haringey's Local Plan
Strategic Policies 2013 - 2026
(formerly the Core Strategy)

March 2013

www.haringey.gov.uk

Haringey Council

3.2 What's the plan not seeking to achieve?

3.2.1 The Strategic Policies Partial Review is necessarily strategic in nature. The aim is not to allocate sites to be developed over the plan period, or to set out detailed development management policies. Detailed issues are omitted from consideration in the knowledge that they can be addressed through the Site Allocations DPD, the Development Management Policies DPD and Area Action Plans (AAPs).

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within **Appendix II**.

Consultation on the scope

4.1.2 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]

4.1.3 As such, an SA Scoping Report was published for consultation in January 2007. 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.

4.1.4 Furthermore, SA scoping work was undertaken in 2012 and 2014 in relation to the Development Management Policies DPD and Site Allocations DPD respectively, which is also relevant to the Strategic Policies Partial Review SA.

4.2 Key issues / objectives

4.2.1 The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these objectives provide a methodological 'framework' for appraisal.

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[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.'*

Table 4.1: The SA Framework

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Social		
Crime	Reduce crime, disorder and the fear of crime	• 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	• 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	• 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	• 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	• 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	• 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	• 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?

Topic	SA Objective	Appraisal criteria
		Will the policy approach under consideration help to…
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	• 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	• 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	• 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	• 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	• 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	• 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	• 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	• 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	• Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	• Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	• Minimise the impact of the ambient noise environment?

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	• 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	• 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	• 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 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

5.1.1   This 'Part' of the report explains how SA has informed and helped to shape development of the Strategic Policies Partial Review. It is here that information is presented on the appraisal of **'reasonable alternatives'**.

5.1.2   Specifically, this chapter is structured as follows:

Chapter 10 -   Introduces the alternatives that have been a focus of appraisal (with a view to demonstrating the 'reasonableness' of the approach taken)

Chapter 11 -   Presents appraisal findings in relation to reasonable alternatives

Chapter 12 -   Explains the Council's reasons for selecting the preferred approach – as set out in the proposed submission plan - in-light of alternatives appraisal.

5.1.3   Providing information on reasonable alternatives, and explaining how consideration of reasonable alternatives has fed into plan-making, is important from an SEA Regulations compliance perspective.[6]

Aside from alternatives appraisal, how else has SA influenced plan-making?

5.1.4   In addition to alterntives appraisal, development of the draft (proposed submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the 'Proposed Alterations' consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the draft plan as it currently stands (specifically, boxes are embedded within the appraisal text to explain the influence of past appraisal).

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[6] In-line with the SEA Directive / Regulations the SA Report must present an appraisal of the draft plan and 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with'.

6 REASONS FOR SELECTING THE ALTERNATIVES DEALT WITH

6.1 Introduction

6.1.1 The aim of this chapter is to explain the set of alternatives that has been a focus of appraisal, with a view to demonstrating the 'reasonableness' of the approach taken.

6.2 Background

6.2.1 The Partial Review of the adopted Strategic Policies DPD is being developed in response to a number of changes in the overarching planning framework, including at the national and regional level, which affect planning locally. These changes include:

[Explain the national / regional planning policy context, how this sets parameters of the Strategic Policies Partial Review]

6.3 Identifying alternatives

[Introduce and explain the reasonable alternatives - i.e. alternative broad spatial strategies - in order to discharge the regulatory requirement to present 'an outline of the reasons for selecting the alternatives dealt with]

7   ALTERNATIVES APPRAISAL FINDINGS

7.1   Introduction

7.1.1   The aim of this chapter is to present alternatives appraisal findings in relation to the set of alternatives introduced above (in Chapter 6).

7.2   Methodology

[Explain the appraisal methodology]

7.3   Appraisal findings

[Present alternatives appraisal findings, i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above]

8 REASONS FOR SELECTING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this chapter is to explain the Council's 'outline reasons' for selecting the preferred approach subsequent to and in-light of alternatives appraisal. In other words, the aim is to explain why the preferred (proposed submission) strategy is 'justified', i.e. the most appropriate strategy, when considered against the reasonable alternatives.

8.2 The Council's reasons for selecting the preferred approach

[Insert the Council's text, responding to alternatievs appraisal findings and explaining why the preferred approach is on-balance preferred, despite inevitable draw-backs in terms of certain issues/objectives]

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9 INTRODUCTION (TO PART 2)

9.1.1 This part of the report presents an appraisal of the Strategic Policies Partial Review as it currently stands, i.e. as presented within the current 'proposed submission' document.

10 APPRAISAL OF THE DRAFT PLAN

10.1.1 This section first presents the appraisal methodology, before going on to present the appraisal of the draft plan under 21 'SA framework' headings. Finally, this section presents appraisal conclusions at the current stage.

10.2 Methodology

[Explain the appraisal methodology]

10.3 Crime

[Present an appraisal of the draft plan in terms of issues relating to 'crime']

10.4 Education

Etc

10.5 Health

10.6 Housing

10.7 Community cohesion

10.8 Accessibility

10.9 Economic growth

10.10 Skills and training

10.11 Economic inclusion

10.12 Town centres

10.13 Biodiversity

10.14 Townscape and cultural heritage

10.15 Open space

10.16 Water resources

10.17 Soil and land quality

10.18 Flood risk and climate change

10.19 Air quality

10.20 Noise

10.21 Energy and carbon

10.22 Waste management

10.23 Sustainable transport

10.24 Overall conclusions

[Present overall appraisal conclusions, highlighting the pros and cons, tensions, trade-offs etc]

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

11 INTRODUCTION (TO PART 3)

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

12 PLAN FINALISATION

12.1.1 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).

12.1.2 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'*.

13 MONITORING

13.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'…

[Insert a discussion of measures envisaged concerning monitoring, in-light of the effects highlighted through appraisal]

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1	Oct 2015	SA Report published alongside the proposed submission version of the DM Policies DPD	Mark Fessey, Principal Consultant		

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INTRODUCTION

1   BACKGROUND

1.1.1   AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Development Management (DM) Policies Development Plan Document (DPD). Once adopted, the DPD will set out the detailed DM 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' issues[1]), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs 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 and Programmes 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 (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[4] The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3   More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point?**

   – Including with regards to consideration of 'reasonable alternatives'.

2. What are the SA findings **at this stage?**

   – i.e. in relation to the draft plan.

3. What happens **next?**

   – What steps will be taken to finalise the plan?

   – What measures are proposed to monitor plan implementation?

2.1.4   These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. **Appendix I** makes the links between the ten Schedule 2 requirements and the three SA questions.

2.2   This SA Report

2.2.1   This document is the SA Report for the DM Policies DPD, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

2.2.2   Before answering Question 1, however, there is a need to set the scene further within this 'Introduction' by answering two initial questions.

---

[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 Chapter 4.

[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

[4] Regulation 12(2)

3   WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1   Overview

3.1.1   The DM Policies DPD, once adopted will set out the detailed development management policies for the Borough; building on the adopted Strategic Policies DPD. The DM 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.

3.1.2   The objectives of the DM Policies DPD are 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.

- Set out design requirements and environmental sustainability standards.

- 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.

3.1.3   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 plan is also being 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.

3.2   What's the plan not seeking to achieve?

3.2.1   The plan is not seeking to set an overarching spatial strategy for the Borough as this is set out in the Strategic Policies DPD (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.

3.2.2   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.

4   WHAT'S THE SCOPE OF THE SA?

4.1   Introduction

4.1.1   The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within **Appendix II**.

Consultation on the scope

4.1.2   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]

4.1.3   As such, an SA Scoping Report was published for consultation in 2012.[6]   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.

4.2   Key issues / objectives

4.2.1   The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these objectives provide a methodological 'framework' for appraisal.

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[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 can be viewed online: http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/development-management-development-plan-document

Table 4.1: The SA Framework

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Social		
Crime	Reduce crime, disorder and the fear of crime	• 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	• 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	• 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	• 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	• 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	• 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	• 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?

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	• 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	• 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	• 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	• 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	• 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	• 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	• 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	• 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	• Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	• Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	• Minimise the impact of the ambient noise environment?

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	• 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	• 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	• 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 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

5.1.1 The 'story' of plan-making / SA up to this point is told within this part of the SA Report. Specifically, this part of the report explains how preparation of the current version of the DM Policies DPD has been informed by appraisal of **alternatives** for the following policy areas / topics:

[Insert list of policy issues that have been the focus of alternatives appraisal in the build-up to finalising the proposed submission plan]

Reasons for focusing on these policy areas

5.1.2 These are all topics that offer opportunities to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Haringey's spatial strategy. Systematic appraisal of (and consultation on) reasonable alternatives equates to proactive plan-making, and is a means of ensuring that the final policy approach is sufficiently justified.

5.1.3 Other policy topics besides those listed above could have been the focus of alternatives appraisal, but were not on the basis that it was unclear what value would be added. For many topics it is proportionate to develop a preferred policy approach on the basis of technical work and consultation, without formal alternatives appraisal. It is important to remember that in many instances DM Policy will closely reflect the policy direction set out by the Strategic Policies DPD (which was developed alongside a process of Sustainability Appraisal).

[Insert any further explanation of reasons for focusing alternatives appraisal on particular policy areas, including reasons why understanding of reasonable alternatives has been refined since the February 2015 consultation]

Structure of this part of the SA Report

5.1.4 Each of the XXX policy areas listed above is assigned a chapter, below. Within each chapter, the following questions are answered:

- What are the reasons for selecting the alternatives dealt with?

- 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 alternatives appraisal findings?

5.1.5 These questions reflect the regulatory requirement for the SA Report to present 1) appraisal findings for 'reasonable alternatives' and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

Aside from alternatives appraisal, how else has SA influenced plan-making?

5.1.6 In addition to alterntives appraisal, development of the draft (proposed submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the draft plan consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the draft plan as it currently stands (specifically, boxes are embedded within the appraisal text to explain the influence of past appraisal).

6 [POLICY AREA 1]

6.1 Introduction

[Introduce the policy area]

6.2 Reasons for selecting the alternatives dealt with

[Introduce the alternatives]

6.3 Summary appraisal findings

[Present summary appraisal findings - i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above - signposting to detailed appraisal findings in an appendix]

6.4 Reasons for selecting the preferred approach in-light of alternatives appraisal

[Insert the Council's text, responding to alternatievs appraisal findings and explaining why the preferred approach is on-balance preferred, despite inevitable draw-backs in terms of certain issues/objectives]

7   [POLICY AREA 2]

7.1   Introduction

[Introduce the policy area]

7.2   Reasons for selecting the alternatives dealt with

[Introduce the alternatives]

7.3   Summary appraisal findings

[Present summary appraisal findings - i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above - signposting to detailed appraisal findings in an appendix]

7.4   Reasons for selecting the preferred approach in-light of alternatives appraisal

[Insert the Council's text, responding to alternatievs appraisal findings and explaining why the preferred approach is on-balance preferred, despite inevitable draw-backs in terms of certain issues/objectives]

8 [POLICY AREA 3]

8.1 Introduction

[Introduce the policy area]

8.2 Reasons for selecting the alternatives dealt with

[Introduce the alternatives]

8.3 Summary appraisal findings

[Present summary appraisal findings - i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above - signposting to detailed appraisal findings in an appendix]

8.4 Reasons for selecting the preferred approach in-light of alternatives appraisal

[Insert the Council's text, responding to alternatievs appraisal findings and explaining why the preferred approach is on-balance preferred, despite inevitable draw-backs in terms of certain issues/objectives]

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9   INTRODUCTION (TO PART 2)

9.1.1   This part of the report presents an appraisal of the DM Policies DPD as it currently stands, i.e. as presented within the current 'proposed submission' document.

10   APPRAISAL OF THE DRAFT PLAN

10.1.1   This section first presents the appraisal methodology, before going on to present the appraisal of the draft plan under 21 'SA framework' headings. Finally, this section presents appraisal conclusions at the current stage.

10.2   Methodology

[Explain the appraisal methodology]

10.3   Crime

[Present an appraisal of the draft plan in terms of issues relating to 'crime']

10.4   Education

Etc

10.5   Health

10.6   Housing

10.7   Community cohesion

10.8   Accessibility

10.9   Economic growth

10.10   Skills and training

10.11   Economic inclusion

10.12   Town centres

10.13   Biodiversity

10.14   Townscape and cultural heritage

10.15   Open space

10.16   Water resources

10.17   Soil and land quality

10.18   Flood risk and climate change

10.19   Air quality

10.20   Noise

10.21   Energy and carbon

10.22   Waste management

10.23   Sustainable transport

10.24   Overall conclusions

[Present overall appraisal conclusions, highlighting the pros and cons, tensions, trade-offs etc]

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

11 INTRODUCTION (TO PART 3)

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

12 PLAN FINALISATION

12.1.1 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).

12.1.2 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'*.

13 MONITORING

13.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'…

[Insert a discussion of measures envisaged concerning monitoring, in-light of the effects highlighted through appraisal]

Revision schedule					
Rev	**Date**	**Details**	**Prepared by**	**Reviewed by**	**Approved by**
1	Oct 2015	SA Report published alongside the proposed submission version of the Site Allocations DPD	Mark Fessey, Principal Consultant		

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TABLE OF CONTENTS

INTRODUCTION

1   BACKGROUND

1.1.1   AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Site Allocations Development Plan Document (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' issues[1]), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs 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 and Programmes 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 (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[4] The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3   More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point?**

    – Including with regards to consideration of 'reasonable alternatives'.

2. What are the SA findings **at this stage?**

    – i.e. in relation to the draft plan.

3. What happens **next?**

    – What steps will be taken to finalise the plan?

    – What measures are proposed to monitor plan implementation?

2.1.4   These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. **Appendix I** makes the links between the ten Schedule 2 requirements and the three SA questions.

2.2   This SA Report

2.2.1   This document is the SA Report for the Site Allocations DPD, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

2.2.2   Before answering Question 1, however, there is a need to set the scene further within this 'Introduction' by answering two initial questions.

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[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 Chapter 4.

[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

[4] Regulation 12(2)

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 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.

3.1.2 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.

3.1.3 Once adopted, the Site Allocations DPD 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.

3.1.4 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; London Plan (2011) and Further Alterations to the London Plan (FALP, 2014), which establishes housing and employment targets for Haringey; and the adopted Strategic Policies DPD (2013). The plan is also being 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.

3.2 What's the plan not seeking to achieve?

3.2.1 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.

3.2.2 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.

4   WHAT'S THE SCOPE OF THE SA?

4.1   Introduction

4.1.1   The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within **Appendix II**.

Consultation on the scope

4.1.2   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]

4.1.3   As such, an SA Scoping Report[6] was published for consultation in January 2014. 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.

4.2   Key issues / objectives

4.2.1   The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these objectives provide a methodological 'framework' for appraisal.

---

[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

Table 4.1: The SA Framework

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Social		
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Health	Improve physical and mental health for all and reduce health inequalities	• 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	• 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?
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Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	• 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?
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Town Centres	Improve the vitality and vibrancy of town centres	• 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	• 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?
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Water Resources	Protect and enhance the quality of water features and resources	• 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	• 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	• Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	• Manage air quality within the borough? • Encourage businesses to produce travel plans?
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Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	• 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?
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Sustainable Transport	Promote the use of sustainable modes of transport	• 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 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5   INTRODUCTION (TO PART 1)

5.1.1   This 'Part' of the report explains how SA has informed and helped to shape development of the Strategic Policies Partial Review. It is here that information is presented on the appraisal of **'reasonable alternatives'**.

5.1.2   Specifically, this chapter is structured as follows:

Chapter 10 -   Introduces the alternatives that have been a focus of appraisal (with a view to demonstrating the 'reasonableness' of the approach taken)[7]

Chapter 11 -   Presents appraisal findings in relation to reasonable alternatives

Chapter 12 -   Explains the Council's reasons for selecting the preferred approach – as set out in the proposed submission plan - in-light of alternatives appraisal.

5.1.3   Providing information on reasonable alternatives, and explaining how consideration of reasonable alternatives has fed into plan-making, is important from an SEA Regulations compliance perspective.[8]

Aside from alternatives appraisal, how else has SA influenced plan-making?

5.1.4   In addition to alterntives appraisal, development of the draft (proposed submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the draft plan consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the draft plan as it currently stands (specifically, boxes are embedded within the appraisal text to explain the influence of past appraisal).

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[7] N.B. The Council remains open to suggestions regarding what should reasonably be the focus of alternatives appraisal. There is the potential to undertake further alternatives appraisal subsequent to the current consultation, i.e. when preparing the proposed submission version of the plan.

[8] In-line with the SEA Directive / Regulations the SA Report must present an appraisal of the draft plan and 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with'.

6   REASONS FOR SELECTING THE ALTERNATIVES DEALT WITH

6.1   Introduction

6.1.1   The aim of this chapter is to explain the set of alternatives that has been a focus of appraisal, with a view to demonstrating the 'reasonableness' of the approach taken.

6.2   Background

6.2.1   The Council's preferred approach to site allocation emerged in 2013 / 2014. Initial work was undertaken in 2013 in-light of the housing need indicated by the 2011 Census, and then subsequent work was undertaken in 2014 in-light of updated understanding of housing and employment growth requirements.

6.2.2   Work undertaken in 2013/14 is explained below. Specifically, there is an explanation of -

1) Reasons for selecting the preferred site package; and

2) Reasons for selecting preferred uses / policy approaches for each site.

[Insert explanation of (1) and (2)]

6.3   Identifying alternatives

[Introduce and explain the various sets of alternatives that have been a focus of appraisal in the build-up to finalising the proposed submission plan. As part of this, explain how understanding of reasonable alternatives has been 'refined' subsequent to the February 2015 consultation. The aim is to discharge the regulatory requirement to present 'an outline of the reasons for selecting the alternatives dealt with]

7 ALTERNATIVES APPRAISAL FINDINGS

7.1 Introduction

7.1.1 The aim of this chapter is to present alternatives appraisal findings in relation to the sets of alternatives introduced above (in Chapter 6).

7.2 Methodology

[Explain the appraisal methodology]

7.3 Appraisal findings

[Present alternatives appraisal findings, i.e. present an alternatives appraisal table for each of the policy areas / sets of alternatives introduced in chapter 6, with each table ranking the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above]

8 REASONS FOR SELECTING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this chapter is to explain the Council's 'outline reasons' for selecting the preferred approach subsequent to and in-light of alternatives appraisal. In other words, the aim is to explain why the preferred (proposed submission) strategy - in relation to each of the policy areas that has been the focus of alternatives appraisal - is 'justified', i.e. the most appropriate strategy, when considered against the reasonable alternatives.

8.2 The Council's reasons for selecting the preferred approach

[Insert the Council's text, responding to alternatives appraisal findings and explaining why the preferred approach is on-balance preferred, despite inevitable draw-backs in terms of certain issues/objectives]

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9	INTRODUCTION (TO PART 2)

9.1.1 This part of the report presents an appraisal of the Site Allocations DPD as it currently stands, i.e. as presented within the current 'proposed submission' document.

10	APPRAISAL OF THE DRAFT PLAN

10.1.1 This section first presents the appraisal methodology, before going on to present the appraisal of the draft plan under 21 'SA framework' headings. Finally, this section presents appraisal conclusions at the current stage.

10.2	Methodology

[Explain the appraisal methodology]

10.3	Crime

[Present an appraisal of the draft plan in terms of issues relating to 'crime']

10.4	Education

Etc

10.5	Health
10.6	Housing
10.7	Community cohesion
10.8	Accessibility
10.9	Economic growth
10.10	Skills and training
10.11	Economic inclusion
10.12	Town centres
10.13	Biodiversity
10.14	Townscape and cultural heritage
10.15	Open space
10.16	Water resources
10.17	Soil and land quality
10.18	Flood risk and climate change
10.19	Air quality
10.20	Noise
10.21	Energy and carbon
10.22	Waste management
10.23	Sustainable transport
10.24	Overall conclusions

[Present overall appraisal conclusions, highlighting the pros and cons, tensions, trade-offs etc]

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

11 INTRODUCTION (TO PART 3)

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

12 PLAN FINALISATION

12.1.1 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).

12.1.2 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'*.

13 MONITORING

13.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'…

[Insert a discussion of measures envisaged concerning monitoring, in-light of the effects highlighted through appraisal]

Revision schedule					
Rev	**Date**	**Details**	**Prepared by**	**Reviewed by**	**Approved by**
1	Oct 2015	SA Report published alongside the proposed submission version of the Tottenham Area Action Plan DPD	Mark Fessey, Principal Consultant		

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INTRODUCTION

1   BACKGROUND

1.1.1   AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Tottenham Area Action Plan (AAP) Development Plan Document (DPD); henceforth known as 'the Tottenham AAP'. Once adopted, the AAP will assist the delivery and implementation of significant development proposals for the Tottenham Hale Growth Area, the North Tottenham Growth Area and the Tottenham High Road Corridor and Seven Sisters Corridor Areas of Change.

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' issues[1]), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs 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 and Programmes 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 (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.[4] The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3   More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point?**

   – Including with regards to consideration of 'reasonable alternatives'.

2. What are the SA findings **at this stage?**

   – i.e. in relation to the draft plan.

3. What happens **next?**

   – What steps will be taken to finalise the plan?

   – What measures are proposed to monitor plan implementation?

2.1.4   These questions are derived from Schedule 2 of the Regulations, which present the information to be provided within the report. **Appendix I** makes the links between the ten Schedule 2 requirements and the three SA questions.

2.2   This SA Report

2.2.1   This document is the SA Report for the Tottenham AAP, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

2.2.2   Before answering Question 1, however, there is a need to set the scene further within this 'Introduction' by answering two initial questions.

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[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 Chapter 4.

[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

[4] Regulation 12(2)

3   WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1   Overview

3.1.1   The Tottenham AAP, once adopted, will assist the implementation of significant development proposals for the Tottenham Hale Growth Area, the North Tottenham Growth Area and the Tottenham High Road Corridor and Seven Sisters Corridor Areas of Change.

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

[Insert the AAP objectives]

3.1.3   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; London Plan (2011) and Further Alterations to the London Plan (FALP, 2014), which establishes housing and employment targets for Haringey; and the adopted Strategic Policies DPD (2013). The plan is also being 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.

3.2   What's the plan not seeking to achieve?

3.2.1   The AAP is an aid to delivery and implementation of the priorities and proposals set out in London Plan and Strategic Policies DPD, and is therefore unable to change the overall location or scale of development at the higher strategic level. 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.

3.2.2   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). Even the allocation of sites is a strategic undertaking. The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within **Appendix II**.

Consultation on the scope

4.1.2 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]

4.1.3 As such, an SA Scoping Report was published for consultation in January 2014.[6] 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.

4.2 Key issues / objectives

4.2.1 The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these objectives provide a methodological 'framework' for appraisal.

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[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 Scoping Report is available at: http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps

Table 4.1: The SA Framework

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Social		
Crime	Reduce crime, disorder and the fear of crime	• 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	• 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	• 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	• 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	• 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	• 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	• 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?

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	• 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	• 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	• 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	• 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	• 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	• 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	• 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	• 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	• Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	• Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	• Minimise the impact of the ambient noise environment?

Topic	SA Objective	Appraisal criteria *Will the policy approach under consideration help to…*
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	• 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	• 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	• 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 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

5.1.1 The 'story' of plan-making / SA up to this point is told within this part of the SA Report. Specifically, this part of the report explains how preparation of the current version of the AAP has been informed by appraisal of **alternatives** for the following policy areas / topics:

[Insert list of policy issues that have been the focus of alternatives appraisal in the build-up to finalising the proposed submission plan]

Reasons for focusing on these policy areas

5.1.2 These are all topics that offer opportunities to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Haringey's spatial strategy. Systematic appraisal of (and consultation on) reasonable alternatives equates to proactive plan-making, and is a means of ensuring that the final policy approach is sufficiently justified.

5.1.3 Other policy topics besides those listed above could have been the focus of alternatives appraisal, but were not on the basis that it was unclear what value would be added. For many topics it is proportionate to develop a preferred policy approach on the basis of technical work and consultation, without formal alternatives appraisal. It is important to remember that:[7]

- In many instances DM policy will closely reflect the policy direction set out by the Strategic Policies DPD (which was developed alongside a process of Sustainability Appraisal). Further, borough-wide policies in the emerging DM Policies DPD will apply to the Tottenham area, and this Plan will also be subject to SA, with alternatives appropriately considered.

- The preferred approach to site allocations in Tottenham has developed through an iterative process that has involved systematic screening of site options and workshops to determine which sites to include in the preferred 'site package' and what the broad preferred use / policy approach should be (given deliverability / viability considerations). Following site screening, it is not clear that there is significant scope for further consideration of 'reasonable alternatives' in relation to the sites that are allocated, particularly in light of sites needed to deliver the preferred spatial strategy for the Tottenham AAP.

  – See Part 1 of the Site Allocations DPD Interim SA Report for a more detailed discussion of the methodology employed by the Council over 2013/14 when developing the preferred approach to site allocations.

[Insert any further explanation of reasons for focusing alternatives appraisal on particular policy areas, including reasons why understanding of reasonable alternatives has been refined since the February 2015 consultation]

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[7] N.B. The Council remains open to suggestions regarding what should reasonably be the focus of alternatives appraisal. There is the potential to undertake further alternatives appraisal subsequent to the current consultation.

Structure of this part of the SA Report

5.1.4   Each of the XXX policy areas listed above is assigned a chapter, below. Within each chapter, the following questions are answered:

- What are the reasons for selecting the alternatives dealt with?

- 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 alternatives appraisal findings?

5.1.5   These questions reflect the regulatory requirement for the SA Report to present 1) appraisal findings for 'reasonable alternatives' and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

Aside from alternatives appraisal, how else has SA influenced plan-making?

5.1.6   In addition to alterntives appraisal, development of the draft (proposed submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the draft plan consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the draft plan as it currently stands (specifically, boxes are embedded within the appraisal text to explain the influence of past appraisal).

6 [POLICY AREA 1]

6.1 Introduction

[Introduce the policy area]

6.2 Reasons for selecting the alternatives dealt with

[Introduce the alternatives]

6.3 Summary appraisal findings

[Present summary appraisal findings - i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above - signposting to detailed appraisal findings in an appendix]

6.4 Reasons for selecting the preferred approach in-light of alternatives appraisal

[Insert the Council's text, responding to alternatievs appraisal findings and explaining why the preferred approach is on-balance preferred, despite inevitable draw-backs in terms of certain issues/objectives]

7 [POLICY AREA 2]

7.1 Introduction

[Introduce the policy area]

7.2 Reasons for selecting the alternatives dealt with

[Introduce the alternatives]

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[Present summary appraisal findings - i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above - signposting to detailed appraisal findings in an appendix]

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8   [POLICY AREA 3]

8.1   Introduction

[Introduce the policy area]

8.2   Reasons for selecting the alternatives dealt with

[Introduce the alternatives]

8.3   Summary appraisal findings

[Present summary appraisal findings - i.e. present a table that ranks the alternatives in order of performance in terms of each of the sustainability topics/objectives listed in table 4.1 above - signposting to detailed appraisal findings in an appendix]

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[Explain the appraisal methodology]

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10.23   Sustainable transport

10.24   Overall conclusions

[Present overall appraisal conclusions, highlighting the pros and cons, tensions, trade-offs etc]

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13.1.1   At the current time, there is a need only to present 'measures envisaged concerning monitoring'…

[Insert a discussion of measures envisaged concerning monitoring, in-light of the effects highlighted through appraisal]