

Habitats Regulations Assessment Screening Report – Alterations to Haringey's Strategic Policies

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1 Introduction

1.1 Background to the project

AECOM has been appointed by London Borough of Haringey (referred to as “Haringey Council” and “the Authority”) to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of Haringey's Alterations to Strategic Policies document on the Natura 2000 network and Ramsar sites in support of the already adopted Haringey Local Plan: Strategic Policies.

- 1.1.1 The Haringey Local Plan: Strategic Policies was formally adopted by the Full Council on 18th March 2013. The Local Plan, along with the saved UDP policies (Unitary Development Plan), sets out a vision and key policies for the future development within the Borough from 2013 through to the end of the plan period (2026). It provides special policies outlining local and strategic development within the Borough, including housing, employment, leisure, and retail provision. The adopted Local Plan included the provision for at least 8,200 net new dwellings to 2026 (in line with the then London Plan).
- 1.1.2 To support Haringey's adopted Local Plan, Habitats Regulations Assessment was undertaken¹. This document is used as a basis for this assessment. The document undertook Habitats Regulations Assessment (HRA) of the following internationally designated sites: The Lee Valley SPA and Ramsar sites, and Epping Forest SAC.
- 1.1.3 Since the Local Plan: Strategic Policies document was adopted in 2013, there have been changes in the overarching planning framework, including at the national and regional level, which affect planning locally. These changes include:
 - The release of 2011 Census data, which set out higher than previously projected population growth figures for London, prompting the Mayor of London to prepare and adopt 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, effective from April 2015 – an 83% increase;
 - Changes to permitted development rights, which give greater scope for the permitted change of use of offices, shops and warehouses to go to residential development, as well as provision for larger residential extensions;
 - Changes to the National Planning Practice Guidance (NPPG), including the methodology for assessing needs most recently for Gypsy and Traveller assessments
 - 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 and Biodiversity 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 Assessment. 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 Hale, 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.

¹ Hyder. (2010). London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment. http://www.haringey.gov.uk/sites/haringeygovuk/files/habitats_regulations_assessment.pdf [Accessed 23/09/15]

- 1.1.4 In light of these changes, the Council identified a number of alterations, the vast majority of which are factual updates, which need to be made to the adopted Local Plan: Strategic Policies document to bring it up to date and ensure it remains consistent with the current national and regional planning position. This document does not assess the entire Local Plan: Strategic Policies document, but the changes made to policy text. It does however draw from the policies that remain unchanged within the adopted Local Plan: Strategic Policies document for support.
- 1.1.5 The objective of this assessment is to:
- identify any aspects of the 'Alterations to Strategic Policies 2011 – 2026 Pre-submission Consultation October 2015' document that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites²), either in isolation or in combination with other plans and projects; and
 - to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

1.2 Current legislation

- 1.2.1 The need for Habitats Regulations Assessment (HRA) is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to "*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*" (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the internationally designated sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 Within the UK, Protected Areas for nature conservation include, those established under National legislation (e.g. Sites of Special Scientific Interest (SSSI)), areas established under European Union Directives/European initiatives (including the Natura 2000 network of sites), and protected areas established under Global Agreements (e.g. Ramsar sites).
- 1.2.3 With relevance to this report, Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. Special Areas of Conservation (SAC) are strictly protected sites designated under Article 3 of the EC Habitats Directive, which requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended)³. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). Ramsar sites are wetlands of international importance designated under the Ramsar Convention.
- 1.2.4 The Conservation of Habitats and Species Regulations 2010 require that land use plans are subject to Appropriate Assessment (AA) where they are likely to have a significant effect on a Natura 2000 site.
- 1.2.5 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network is maintained.
- 1.2.6 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

² Wetlands of International Importance designated under the Ramsar Convention 1979

³ <http://jncc.defra.gov.uk/>

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Figure 1: The Legislative Basis for Appropriate Assessment

- 1.2.7 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'appropriate assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.3 Scope of the Project

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of a HRA of a supporting Local Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:
- All sites within the Local Plan area boundary; and
 - Other sites shown to be linked to development within the Borough boundary through a known 'pathway'.

- 1.3.2 Briefly defined, pathways are routes by which a change in activity provided within the Alterations to Strategic Policies 2011-2026 document can lead to an effect upon an internationally designated site. In terms of the second category of designated site listed above, guidance from the former Department of Communities and Local Government states that the HRA should be *'proportionate to the geographical scope of the [plan policy]'* and that *'an AA need not be done in any more detail, or using more resources, than is useful for its purpose'* (CLG, 2006, p.6). More recently, the Court of Appeal⁴ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *'achieved in practice'* to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)⁵. In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'*.
- 1.3.3 No internationally designated sites are located within the London Borough of Haringey's boundary.
- 1.3.4 The following internationally designated sites are considered within the Habitats Regulations Assessment of Haringey's Alterations to Strategic Policies 2011-2026 document and are located within 20km of the London Borough of Haringey's authority boundary. These sites could potentially have impact pathways present that could interact with Haringey's Alterations to Strategic Policies document:
- Lee Valley SPA and Ramsar site;
 - Epping Forest SAC;
 - Richmond Park SAC;
 - Wimbledon Common SAC; and
 - Wormley-Hoddesdonpark Woods SAC.
- 1.3.5 During an initial sieving exercise to screen out internationally designated sites (e.g. no realistic impact pathways present), the following internationally designated sites can be sieved out from further assessment due to the distances involved.
- Wormley-Hoddesdonpark Woods SAC located 12.9km from the borough boundary;
 - Richmond Park SAC located 14.3km from the borough boundary, and;
 - Wimbledon Common SAC located 14.7km from the borough boundary.
- 1.3.6 These sites are not considered further within this document.
- 1.3.7 There are three internationally designated sites that are located within a sufficiently close distance that there could be impact pathways linking to Haringey's draft DMP. These are:
- Lee Valley SPA and Ramsar site, located immediately adjacent to the London Borough of Haringey to the east; and,
 - Epping Forest SAC, located 3km east from the London Borough of Haringey.
- 1.3.8 Details of these internationally designated sites that could be linked with Haringey's Alterations to Strategic Policies document as identified within paragraph 1.3.7 can be found in Appendix A. Appendix B, Figure 1 illustrates the locations of the internationally designated sites in relation to the London Borough of Haringey's boundary.
- 1.3.9 The Habitats Regulation Assessment undertaken for the adopted Local Plan in 2010⁶ identified only one impact pathway linking the London Borough of Haringey Local Plan to the Lee Valley SPA and Ramsar site. The residual impact pathway was construction noise, disturbing features in the designated site. Epping Forest SAC is located 3km from the London

⁴ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁵ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

⁶ Ibid

Borough of Haringey, and as such, this impact pathway did not link the SAC to the Local Plan in 2013. The 2013 Local Plan provided for 8,200 net new dwellings to the end of the Plan period (2026). Haringey's Alteration to Strategic Policies document provides for meeting the revised strategic housing requirement of 19,802 net new dwellings between 2011 and 2026. As a result of this change, at the initial sieving stage, Epping Forest SAC cannot be automatically screened out from likely significant effects resulting from Haringey's Alterations to Strategic Policies document, and impact pathways affecting this SAC require assessment. In addition, a more detailed investigation of impact pathways linking to Lee Valley SPA and Ramsar site is undertaken.

1.3.10 The remainder of this document considers potential for likely significant effects from impact pathways resulting from Haringey's Alterations to Strategic Policies document upon the following internationally designated sites:

- Lee Valley SPA and Ramsar site
- Epping Forest SAC

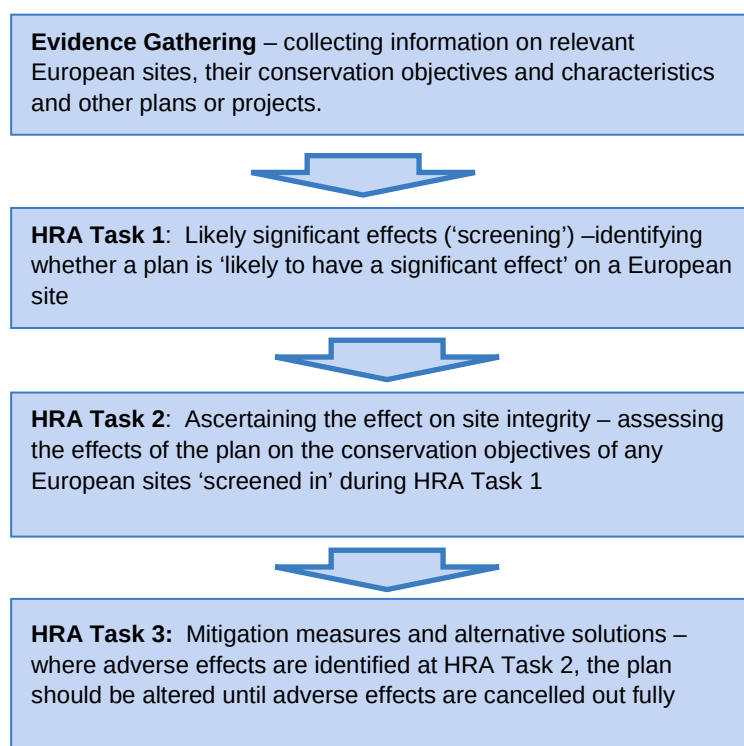
1.4 This Report

1.4.1 Section 2 of this report summarises the methodology for the assessment. Section 3 identifies the possible pathways by which adverse effects on European protected sites could arise. Section 4 considers each policy amendment within Haringey's Alterations to Strategic policies document, assessing possible pathways upon internationally designated sites that may be vulnerable, determine likely significant effects, based on key environmental conditions required to maintain the integrity of these sites. The screening exercise concludes by either screening out any possible impacts or by determining that mitigation or avoidance measures are required. Where mitigation strategies are deemed necessary, potential approaches are discussed. In combination effects with other plans on each internationally designated site are also considered within Section 4. Background information on all the internationally designated sites discussed in this report is presented within Appendix A. Figure 1 of Appendix B presents a map showing all internationally important wildlife sites discussed.

2 Methodology

2.1 Introduction

- 2.1.1 This HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist⁷. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006⁸. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁹ as has the RSPB¹⁰. Both of these have been referred to alongside the guidance outlined in Section 1.2 in undertaking this HRA.
- 2.1.2 Figure 2 below, outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.



Source: CLG, 2006

Figure 2- Four-Stage Approach to Habitats Regulations Assessment

2.2 HRA Task 1 - Likely Significant Effects (LSE)

- 2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

⁷ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁸ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁹ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

¹⁰ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007)

The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it. The RSPB, Sandy.

- 2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon internationally designated sites, usually because there is no mechanism for an adverse interaction with internationally designated sites. This stage is the subject of Chapter 4 of this report (See Appendix C, Table 1 for the screening table), and goes a step further than a scoping report that was able to scope out sites listed in section 1.3.5. Those particular sites could be scoped out regardless of the nature and scale of any proposed development, whereas screening is needed where there is a potential pathway of impact and the scale, nature and location of development determines whether this actually exists.
- 2.2.3 The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the former Department of Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

2.3 Confirming Other Plans and Projects That May Act In Combination

- 2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the internationally designated site(s) in question.
- 2.3.2 It is neither practical nor necessary to assess the 'in combination' effects of the Local Plan within the context of all other plans and projects within this area of England. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial allocations proposed for neighbouring and nearby authorities over the lifetime of the Local Plan. A good place to start is the London Plan (2015)¹¹
- 2.3.3 In considering the potential for regional housing development on internationally designated sites, the primary consideration for many sites is the impact of visitor numbers – i.e. recreational pressure. Other pathways of impact described in more detail in Chapter 3 include disturbances from construction activities, urbanisation, water quality and water quantity, and air quality. Whilst these are also strongly related to housing provision, the actual geographic impact must also be considered within the context of relevant infrastructure.

Table 1: Housing Levels to be Delivered in Neighbouring Authorities

Local Authority	Total housing (taken from the London Plan, 2015 ¹²) Minimum ten year target 2015-2025	Total housing (taken from the London Plan, 2015) Annual monitoring target 2015-2025
London Borough of Barnet	23,489	2,349
London Borough of Camden	8,892	889
London Borough of Enfield	7,976	798
London Borough of Islington	12,641	1,264
London Borough of Hackney	15,988	1,599
London Borough of Waltham Forest	8,620	862

- 2.3.4 There are other plans and projects that are relevant to the 'in combination' assessment and the following have all been taken into account in this assessment:

¹¹ Mayor of London (March, 2015). The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Also referred to as Further Alterations to the London Plan (FALP)

¹² Ibid

Plans

- **London Borough of Haringey Local Plan: Strategic Policies.** Adopted March 2013.
- **The London Plan.** The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Published March 2015.
- **The London Plan.** Sub Regional Development Framework – North London. Published May 2006.
- **The London Plan.** Sub Regional Development Framework – Central London. Published May 2006.
- **North London Waste Plan.** This is currently in preparation; the draft is due for consultation in 'Summer/ Autumn 2015'.
- **London Borough of Barnet Local Plan Core strategy DPD.** Adopted September 2012.
- **London Borough of Camden Core Strategy.** Adopted November 2010.
- **London Borough of Enfield Core Strategy.** Adopted November 2010.
- **London Borough of Islington Core Strategy.** Adopted February 2011.
- **London Borough of Hackney Core Strategy: Local Development framework.** Adopted December 2010.
- **London Borough of Waltham Forest Local Plan Core Strategy.** Adopted March 2012
- **Walthamstow Wetlands.** Planning permission granted 2014.

- 2.3.5 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

3 Pathways of Impact

3.1 Introduction

3.1.1 In carrying out an HRA it is important to determine the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with internationally designated sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Following the HRA of the Local Plan in 2010 and a brief sieve of the DMP, the following impact pathways are considered within this document.

3.1.2 Impact pathways for consideration are:

- Disturbance (from recreational and construction activities)
- Urbanisation
- Atmospheric pollution
- Water abstraction
- Water quality

3.2 Disturbance (from Recreational and Construction Activities)

3.2.1 Recreational use of an internationally designated site and construction activities within close proximity of an internationally designated site have potential to:

- Cause damage through mechanical/ abrasive damage and nutrient enrichment;
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl; and
- Prevent appropriate management or exacerbate existing management difficulties.

Recreational pressure

3.2.2 Different types of internationally designated sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

Mechanical/abrasive damage and nutrient enrichment

3.2.3 Most types of terrestrial internationally designated site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.

3.2.4 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:

- Wilson & Seney (1994)¹³ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that

¹³ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

- Cole et al (1995a, b)¹⁴ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow and grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole (1995c)¹⁵ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
- Cole & Spildie (1998)¹⁶ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance, but recovered rapidly. Higher trampling intensities caused more disturbance.

3.2.5 The total volume of dog faeces deposited on sites can be surprisingly large. For example, at Burnham Beeches National Nature Reserve over one year, Barnard¹⁷ estimated the total amounts of urine and faeces from dogs as 30,000 litres and 60 tonnes respectively. The specific impact on Epping Forest has not been quantified from local studies; however, the fact that habitats for which the SAC is designated appear to be subject already to excessive nitrogen deposition, suggests that any additional source of nutrient enrichment (including uncollected dog faeces) will make a cumulative contribution to overall enrichment. Any such contribution must then be considered within the context of other recreational sources of impact on sites.

Disturbance

3.2.6 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding¹⁸. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately the survival of the birds. In addition, displacement of birds from one feeding site to others can increase the

¹⁴ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

¹⁵ Cole, D.N. (1995c) Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah

¹⁶ Cole, D.N., Spildie, D.R. (1998) Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

¹⁷ Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, 11, 16 - 19

¹⁸ Riddington, R. et al. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds¹⁹.

3.2.7 The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:

- Underhill et al²⁰ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
- Evans & Warrington²¹ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to displacement of birds resulting from greater recreational activity on surrounding water bodies at weekends relative to week days.
- Tuite et al²² used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that on inland water bodies shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.
- Pease et al²³ investigated the responses of seven species of dabbling ducks to a range of potential causes of disturbance, ranging from pedestrians to vehicle movements. They determined that walking and biking created greater disturbance than vehicles and that gadwall were among the most sensitive of the species studied.
- In a three-year study of wetland birds at the Stour and Orwell SPA, Ravenscroft²⁴ found that walkers, boats and dogs were the most regular source of disturbance. Despite this, the greatest responses came from relatively infrequent events, such as gun shots and aircraft noise. Birds seemed to habituate to frequent 'benign' events such as vehicles, sailing and horses, but there was evidence that apparent habituation to more disruptive events related to reduced bird numbers – i.e. birds were avoiding the most frequently disturbed areas. Disturbance was greatest at high tide and on the Orwell, but birds on the Stour showed greatest sensitivity.

3.2.8 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer. In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication

¹⁹ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

²⁰ Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

²¹ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pit lake near London. *International Journal of Environmental Studies* 53: 167-182

²² Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

²³ Pease, M.L., Rose, R.K. & Butler, M.J. 2005. Effects of human disturbances on the behavior of wintering ducks. *Wildlife Society Bulletin* 33 (1): 103-112.

²⁴ Ravenscroft, N. (2005) Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. Era report 44, Report to Suffolk Coast & Heaths Unit.

near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces²⁵.

- 3.2.9 Underhill-Day²⁶ summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54.0%.
- 3.2.10 However the outcomes of many of these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population²⁷. A literature review undertaken for the RSPB²⁸ also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on internationally designated sites.
- 3.2.11 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration (such as those often associated with construction activities). Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.2.12 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 3.2.13 It should be emphasised that recreational use is not inevitably a problem. Many internationally designated sites are also nature reserves managed for conservation and public appreciation of nature. The Lee Valley Regional Park that encompasses the SPA and Ramsar sites is such an example. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.2.14 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at internationally designated sites involves location of new development away from such sites; Local Development Frameworks (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
- Access management – restricting access to some or all of a internationally designated site - is not usually within the remit of the Council and restriction of access may contravene a range of Government policies on access to open space, and Government objectives for increasing exercise, improving health etc. However, active management of access may be possible, for example as practised on nature reserves.
 - Habitat management is not within the direct remit of the Council. However the Council can help to set a framework for improved habitat management by promoting cross-authority collaboration and S106 funding of habitat management. Provision of alternative recreational space can help to attract recreational users away from sensitive internationally designated sites, and reduce pressure on the sites. For example, some species for which internationally designated sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to other, less sensitive, sites. However the location and type of alternative space must be attractive for

²⁵ Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

²⁶ Underhill-Day, J.C. (2005). A literature review of urban effects on lowland heaths and their wildlife. Natural England Research Report 623.

²⁷ Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, **97**, 265-268

²⁸ Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

users to be effective. In the case of both Epping Forest and Lee Valley SPA and Ramsar sites, dog-walking, walking and cycling are likely to be the major site usages, and so alternative space needs to cater for this.

- 3.2.15 The Lee Valley SPA and Ramsar site lies immediately adjacent to the London Borough of Haringey and Epping Forest SAC is located 3km from the Borough, as such they are theoretically vulnerable, to the effects of recreational pressure and/ or disturbances from construction activities resulting from development within Haringey.
- 3.2.16 It is therefore necessary to perform an initial screening exercise to determine whether Haringey's Alterations to Strategic Policies document contains policy measures that could lead to a likely significant effects, either alone or 'in combination' with other plans and projects, through recreational pressure, on these internationally designated sites.

3.3 Urbanisation

- 3.3.1 This impact is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:
- Increased fly-tipping - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive non-native species with garden waste. Non-native species can in some situations, lead to negative interactions with habitats or species for which internationally designated sites may be designated. Garden waste results in the introduction of invasive non-native species precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out²⁹. Non-native species may also be introduced deliberately or may be bird-sown from local gardens.
 - Cat predation - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period³⁰. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation
- 3.3.2 The most detailed consideration of the link between relative proximity of development to internationally designated sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.
- 3.3.3 After extensive research, Natural England and its partners produced a 'Delivery Plan' which made recommendations for accommodating development while also protecting the interest features of the internationally designated site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this internationally designated site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated since this was the range over which cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.
- 3.3.4 As such, screening is undertaken to determine whether Haringey's Alterations to Strategic Policies document contains policy measures that could lead to likely significant effects upon Lee Valley internationally designated site, either alone or 'in combination' with other plans and projects, through impacts of urbanisation.

²⁹ Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

³⁰ Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188

3.4 Atmospheric Pollution

- 3.4.1 The main pollutants of concern for internationally designated sites are oxides of nitrogen (NO_x), ammonia (NH₃) and sulphur dioxide (SO₂). NO_x can have a directly toxic effect upon vegetation. In addition, greater NO_x or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

Local air pollution

- 3.4.2 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"³¹. This is therefore the distance that has been used throughout this HRA in order to determine whether internationally designated sites are likely to be significantly affected by development under the Local Plan.

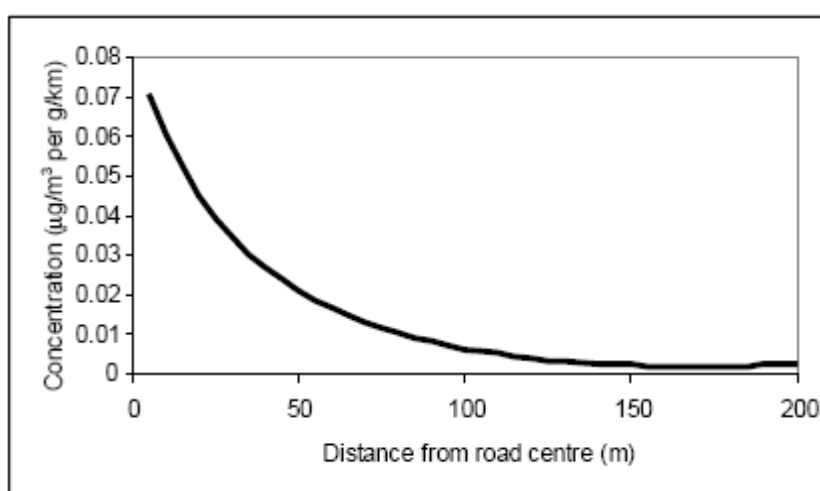


Figure 3: Traffic Contribution to Concentrations of Pollutants at Different Distances from a Road (Source: Dft)

- 3.4.3 Lee Valley internationally designated site lies within 200m of two major roads (A503 and A1055) that are likely to be regularly used by vehicle journeys within the Borough as a result of the increased population, and potentially other development plans. As such, it can be concluded that air quality should be included within the scope of this assessment. The location of these roads in relation to the internationally designated sites is illustrated in Appendix B, Figure 1.

Table 2: Major Roads Within 200m of Lee Valley SPA and Ramsar site

Road	Proximity to Lee Valley SPA and Ramsar site
A503	The A503 bisects the designated site. The A503 is adjacent to Low Maynard and High Maynard Reservoir (located north of the road), and 10m from Reservoir No. 4, and 70m of Reservoir No. 2 (located south of the road) for a distance of approximately 470m.
A1055	The A1055 is located west of the internationally designated site. At its closest the road is located 180m from the site.

- 3.4.4 Whilst Epping Forest SAC is located within 200m of major roads, due to the convoluted routes for traffic from Haringey to take to Epping Forest SAC, it is unlikely that links exist between

³¹ <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>; accessed 13/04/12

the Haringey DMP and Epping Forest SAC via the an air quality impact pathway. Air quality in relation to Epping Forest SAC is not discussed further.

Table 3: Critical Loads of SPA and Ramsar Features and Existing Nitrogen Deposition Rates Upon Features.

3.4.5 If hi-lighted in red, the feature is already in exceedance of its Critical Load. If hi-lighted in orange, the feature is within its Critical Load limits. If hi-lighted in green, the feature is not below Critical Load limits.

Site	Site Feature	Critical Load (kg N/ha/ya) ³²	Average current levels of N deposition (kg N/ha/ya) ³³
Lee Valley SPA	Wintering bittern	15-30 (Critical load class: rich fen)	16.28 ³⁴
	Migratory gadwall	(Standing open water) No comparable habitat with established critical load estimate available.	No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site specific level. Furthermore, consideration should also be given to other sources of N, i.e. discharges to water, diffuse agricultural pollution etc.
	Migratory shoveler		
Lee Valley Ramsar	Whorled water-milfoil	3-10 (Critical Load Class: standing open water and canals: mesotrophic standing waters)	16.28
	Waterboatman <i>Micronecta minutissima</i>	(Standing open water) No comparable habitat with established critical load estimate available.	No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site specific level. Furthermore, consideration should also be given to other sources of N, i.e. discharges to water, diffuse agricultural pollution etc.
	Northern shoveler		
	Gadwall		

3.5 Water abstraction

3.5.1 London is generally an area of high water stress. Development within the London Borough of Haringey will increase water demand.

3.5.2 Haringey lies within Thames Water's supply area, specifically their London Resource Zone. Approximately 80% of London's water supplies come from surface water of the rivers Thames

³² www.APIS.ac.uk [accessed 13/10/15]

³³ www.APIS.ac.uk [accessed 13/10/15]

³⁴ This is an average from 5km grid squares that cover the designated site. As such, these levels do not necessarily reflect exact levels within the parts of the SPA and Ramsar sites where the bittern and whorled water-milfoil are found.

and Lee via reservoirs, and 20% from groundwater sources situated beneath the London Boroughs from the confined chalk aquifer³⁵. Water supply for Thames Water's London Resource Zone does involve some abstraction from the Lee Valley Reservoirs (including Walthamstow Reservoirs), which are also subject to an agreement to (if necessary) supply Essex and Suffolk Water with up to 91ML/day average bulk transfer. Negotiations are currently being undertaken to reduce this transfer quantity to Essex and Suffolk Water to no less than 60 ML/d in the period January to March and 75 ML/d for the remainder of the year. The bulk supply is provided from the King George and William Girling Reservoirs (these reservoirs are not located within the Lee Valley internationally designated site, but are likely to be linked to the reservoirs within the designated site) in the Lee Valley, potentially supported by abstraction directly from the River Lee at defined intakes, if required.

- 3.5.3 Within the London Catchment Abstraction Management Strategy document³⁶, the Environment Agency identifies that within AP8 (the section of the River Lee between Enfield Lock to the north and the Tidal Thames to the south) *'New consumptive surface water abstractions in the Lower Lee catchment will be considered only at times of very high flows. Abstraction at very high flows will not provide a reliable source of water as they may not occur every year. Applicants may need to invest in a water storage reservoir to store water when it's available. Abstractions that are considered to be non-consumptive or small scale consumptive licences that result in an overall net benefit to the water environment may be considered beyond the stated restrictions, subject to a local impact assessment.'*
- 3.5.4 With no other schemes in place, increased residential and employment development as a result of Haringey's Alteration to Strategic Policies document could lead to a need for damaging levels of abstraction from the Lee Valley SPA/Ramsar when considered cumulatively with all other new development in the London WRZ and further north in Hertfordshire that would ordinarily entail water supply from the Lee Valley. However, Thames Water have implemented a major water supply project in London which involves abstraction and desalination of water from the tidal River Thames (the Thames Gateway Water Treatment Plant), such that damaging levels of abstraction from the River Lee to supply the London Borough of Haringey or other parts of London should be avoidable. The Revised Draft Water Resources Management Plan for the London area³⁷ determined that if no action was taken, then the London WRZ supply demand balance would be in deficit of between 55.4ML/d by 2015 and up to 291.7ML/d by 2030. This was taking into account housing forecasts from then existing Local Plan documents at that time. Thames Water proposes to address this imbalance through a number of changes. These are: demand management, leakage reduction, a new raw water trading agreement with RWE N Power in 2015 and small ground water schemes. Ultimately it is the Environment Agency that is the competent authority that determines licences for abstraction, thus it is not the responsibility of the Council to determine if levels of water abstraction will not lead to likely significant effects. The HRA for the 2013 London Plan³⁸ deferred screening of impacts resulting from the provision of increased housing within the Plan period to 'lower tier HRAs', placing the responsibility at a lower level, such as a Borough level.
- 3.5.5 The London Borough of Haringey Council has been consulting with Thames Water regarding the issue of water supply. It is understood that there is no suggestion that the total quantum of development proposed within Haringey's combined Alterations to Strategic Policies document and the adopted Local Plan cannot be accommodated within existing provisions, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey's Infrastructure Delivery Plan. As such, it can be determined that no likely significant effects upon the Lee Valley SPA and

³⁵ Thames Water. (2015) Thames Water Final Water Resources Management Plan 2015 – 2040
http://www.thameswater.co.uk/wrmp/Section_0.pdf [Accessed 16/10/15]

³⁶ Environment Agency. (2013) London Abstraction Licencing Strategy
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289888/LIT_2545_705985.pdf
[Accessed 16/10/15]

³⁷ Ibid.

³⁸ Mayor of London (October, 2009). Habitats Regulations Assessment Screening Report. Consultation draft replacement London Plan (Spatial Development Strategy for Greater London).
<https://www.london.gov.uk/sites/default/files/archives/uploads-hra-final-report-oct09.pdf> [Accessed 20/10/15]

Ramsar site will result as a consequence of Haringey's Alterations to Strategic Policies document. This is not discussed further within this document.

3.6 Water quality

- 3.6.1 Wastewater from Haringey is processed in Sewage Treatment Works (STWs). Discharges from STWs into watercourses such as Salmons Brook and the River Lee have potential to impact upon the Lee Valley SPA and Ramsar site. STWs that treat water from the London Borough of Haringey include Deephams STW and Beckton STW. These have both recently been subject to major improvement schemes by Thames Water to increase their capacities. Thames Water are undertaking a range of works across London to improve its sewage treatment network, increasing its capacity and improving the water quality within waterways such as the River Lee and the River Thames.
- 3.6.2 Deephams STW: Planning Permission has been granted for the upgrade to the Deephams STW within the London Borough of Enfield, for completion in 2018. The planned upgrade will help increase capacity and improve water quality³⁹ within Salmons Brook (where water is discharged into) and the River Lee (Salmons Brook flows into the River Lee). These improvement works will enable Thames Water to treat greater quantities of wastewater to a higher standard than is currently the case.
- 3.6.3 Beckton STW: This is being expanded by '60 per cent to enable it to deal with the increased volumes of sewage and allow for a ten per cent population increase until 2021 so it can:
- *Fully treat increased flows during heavy rainfall, which currently discharge into the River Thames when the site becomes overloaded to prevent streets and homes from flooding.*
 - *Treat additional storm flows from the Lee Tunnel, a new four-mile sewer which will capture storm sewage that currently overflows into the River Lee when the sewerage system gets overwhelmed during heavy rainfall.*
 - *Accommodate additional flows from the proposed Thames Tideway Tunnel.*⁴⁰
- 3.6.4 Beckton STW discharges in the tidal stretches of the River Thames, located downstream from the River Lee SPA and Ramsar site. As such, there are no impact discharge pathways present to the River Lee SPA and Ramsar site.⁴¹ A pathway does exist, in the sense that this project will reduce sewerage outflows into the River Lee, thus improving water quality within the River Lee. This is a positive impact pathway that will not result in detrimental likely significant effects upon the Lee Valley SPA and Ramsar site.
- 3.6.5 Lee Tunnel: The Lee Tunnel is currently under construction. It will tackle discharges from London's largest Combined Sewerage Overflow (CSO) at Abbey Mills Pumping Station in Stratford, which accounts for 40 per cent of the total discharge. It will help prevent more than 16 million tonnes of sewage mixed with rainwater overflowing into the River Lee each year, by

³⁹ Thames Water. (2015). Planning Permission Granted.

<http://www.thameswater.co.uk/deephams/16659.htm> [Accessed 19/10/15]

Thames Water. (2014). A630 Deepham Sewage Works Upgrade. Project Overview report. Phase 2 Public Consultation Version.

⁴⁰ Thames Water. (2015). Sewage Works upgrades: Beckton Sewage treatment Works

<http://www.thameswater.co.uk/about-us/10098.htm> [Accessed 19/10/15]

⁴¹ According to the Environment Agency's Stage 3 Appropriate Assessment for the Thames Estuary and Marshes SPA/Ramsar site, that lies downstream from Beckton, current consented discharges do not have a significant adverse impact upon the Thames Estuary & Marshes SPA, with the exception of slightly elevated levels of elemental copper (Cu) derived from pipes at Reading and Slough. Moreover, development within Haringey will take place at a time when a range of water quality improvements to the Thames Tideway as a whole will be implemented through various Thames Water/Environment Agency schemes including the interception and storage of wastewater from a large number of Combined Sewer Overflows (CSO's) in London and expansions to the treatment capacity of Thames Water's Sewage treatment Works, including at Beckton which will enable them to treat greater quantities of wastewater to a higher standard than is currently the case. As such, the overall water quality of the River Thames should actually improve over the delivery period.

capturing it and transferring it to Beckton Sewage Treatment Works⁴². This is expected to be operational by the end of 2015. A pathway does exist, in the sense that this project will reduce sewerage outflows into the River Lee, thus improving water quality within the River Lee. This is a positive impact pathway that will not result in detrimental likely significant effects upon the Lee Valley SPA and Ramsar site.

- 3.6.6 Thames Tideway Tunnel: It is planned that construction works will commence in 2016. The tunnel will be a sewer the width of three London buses, which will run up to 20 miles from west to east London. It is designed to reduce the amount of raw sewage overflow into the Thames (currently this happens up to 60 times a year). *'The Thames Tideway Tunnel will deal with this problem for at least the next 100 years. It will connect up to the 34 most polluting sewer overflows, as identified by the Environment Agency, to capture sewage which would otherwise spill into the river Thames, before transferring it to our Beckton sewage works to be treated.'*⁴³ Ultimately, this project will improve water quality of the River Thames, downstream of the Lee Valley SPA and Ramsar site. This project does not contain impact pathways that link with the Lee Valley SPA and Ramsar site.
- 3.6.7 In conclusion, the Deephams STW, Beckton STW and Lee Tunnel will all result in improvements to water quality downstream of these STWs within the River Lee and thus the Lee Valley SPA and Ramsar site. These works have been designed to cope with future increases in sewage resulting from future increases in sewage output.
- 3.6.8 The provision for the increases in housing supply to meet the strategic housing delivery requirement of 19,802 net new dwellings through to the end of the Plan period (2026) and an increase in Local Employment Areas outlined within Haringey's Alterations to Strategic policies document, have potential to increase the sewage output from within the London Borough of Haringey. The projects noted above will improve the capacity of the STWs and improve the quality of the water discharged. However, no data is available to determine exact capacities.
- 3.6.9 As noted in the previous section, the HRA for the 2013 London Plan⁴⁴ deferred screening of impacts from increased sewage resulting from the provision of increased housing within the Plan period to 'lower tier HRAs', placing the responsibility at a lower level, such as a Borough level. The London Borough of Haringey Council has been consulting with Thames Water regarding the issue of dealing with waste water. It is understood that there is no suggestion that the total quantum of development proposed within Haringey's combined Alterations to Strategic Policies document and the adopted Local Plan cannot be accommodated within existing provisions, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey's Infrastructure Delivery Plan. As such, it can be determined that no likely significant effects upon the Lee Valley SPA and Ramsar site will result as a consequence of Haringey's Alterations to Strategic Policies document. This is not discussed further within this document.

Location specific site runoff

- 3.6.10 The Walthamstow Reservoirs portion of the Lee Valley SPA and Ramsar site lies in close proximity to the A503, and therefore there is potential for point source pollution events to arise from accidental spillages from increases in the number of vehicles on this route resulting from Haringey's Alterations to Strategic policies document. In reality the implementation by transport operators of measures to avoid point source pollution is not the responsibility of the Council, and it is also likely that the levels of development promoted within the Plan will lead to a minimal increase in risk of such events occurring, given that the likelihood of a catastrophic spillage event may already be considered low. The River Lee and River Lee Navigation separate the reservoirs from most development identified within Haringey's Alterations to Strategic Policies document such as the Local Employment Areas of Hale Wharf, Central Leaside, and South Tottenham and housing estates identified for improvement works (Northumberland Park, and Leabank View / Lemsford Close), and do not in themselves form a part of the SPA or Ramsar within Haringey, whilst it is noted that these will be

⁴² Thames Water. (2015). Lee Tunnel. <http://www.thameswater.co.uk/about-us/10113.htm> [Accessed 19/10/15]

⁴³ Thames Water. (2015). Thames Tideway Tunnel. <http://www.thameswater.co.uk/about-us/10115.htm> [Accessed 19/10/15]

connected to the reservoirs of the SPA and Ramsar site. Standard construction methodologies and standard operational phase requirements include provisions to ensure no runoff leaves the site.

- 3.6.11 In conclusion, no internationally designated sites are susceptible to reduced water quality through STW discharges or direct run-off arising from development within Haringey's' Alterations to Strategic Policies document, and therefore such considerations are not considered further within this HRA.

⁴⁴ Ibid

4 Screening Assessment

4.1.1 As a first step, an initial screening exercise was undertaken in order to identify any changes to the Policies that required more detailed screening and discussion. This exercise is set out in Appendix C Table 1. The initial screening of Haringey's Alterations to Strategic policies document identified 3 policies that contain a potential linking pathway that could result in a likely significant effect upon Lee Valley SPA and Ramsar site and/ or Epping Forest SAC. The following amended policies within Haringey's Alterations to Strategic Policies document have potential to result in likely significant effects upon the internationally designated sites and are therefore subject to a more detailed discussion of likely significant effects in this chapter:

- Policy SP1: Managing Growth
- Policy SP2: Housing
- Policy SP8: Employment

4.1.2 These policies provide for an increase in net new residential development within Haringey and new Local Employment Areas are identified.

4.2 Disturbance (from Recreational and Construction Activities)

4.2.1 Policies SP1 (Managing Growth) and SP2 (Housing) provide for meeting the strategic housing requirement of 19,802 net new dwellings to the end of the Plan period (2026). This is an increase of 11,602 net new dwellings from the 8,200 outlined within Haringey's adopted Strategic Policies document. The HRA for Haringey's adopted Strategic Policies document⁴⁵ determined no likely significant effects upon either Lee Valley SPA and Ramsar site and Epping Forest SAC resulting from an increase in recreational pressure resulting from the 8,200 net new dwellings provided for within the policies. However, in light of the not insignificant increase in proposed net new dwellings within the Borough, this will need to be re-assessed.

Epping Forest SAC

Recreational Activities

4.2.2 At its closest, Epping Forest SAC is located 3km east of the London Borough of Haringey. Epping Forest SAC receives millions of visits per year. A programme of detailed formal visitor surveys has been undertaken in recent years and these have considerably refined our understanding of visitor catchments for Epping Forest. One visitor survey report⁴⁶ identified that those living within 2km of the edge of the Forest comprise at least 95% of all visitors. As such, nowhere within the London Borough of Haringey lies within the core recreational catchment for Epping Forest SAC. No likely significant effects upon Epping Forest SAC will arise as a result of increases in recreational pressure from Haringey's Alteration to Strategic Policies document. This pathway is therefore not considered further with regard to this internationally designated site.

4.2.3 There are no other potential impact pathways present between Epping Forest SAC and Haringey's Alteration to Strategic Policies document. This site can be screened out from further assessment.

In-combination with other projects and plans

4.2.4 As identified above, 5% of visitors to Epping Forest SAC come from beyond 2km of the designated site, the London Borough of Haringey is located 3km from the SAC. Epping Forest SAC is located within the Boroughs of Waltham Forest and Epping Forest, in part lies

⁴⁵ Ibid

⁴⁶ Alison Millward Associates. 2011. Epping Forest Visitor Survey 2011: Results Summary

adjacent to Redbridge, and within 300m of the London Borough of Enfield. Whilst there are no details currently available, it is feasible to conclude that the increase in recreational pressure resulting from the increase in dwellings provided within Haringey's Alterations to Strategic Strategies document, alone or in combination with other projects or plans, (including the London Plan) would not result in an increase in recreational pressure upon Epping Forest SAC that would result in likely significant effects. This is because recreational activities within Epping Forest are managed by the City of London. As such, there no likely significant effects will result alone or in combination with other projects or plans.

Lee Valley SPA and Ramsar site

Recreational Activities

- 4.2.5 At its closest, Lee Valley SPA and Ramsar site is located adjacent to the London Borough of Haringey. The citations for these sites⁴⁷, identify that they are vulnerable to increases in recreational pressure. The Strategic Policies document identifies that the majority of new housing will be provided for within Growth Areas. One of these is Tottenham Hale, located adjacent to the SPA and Ramsar site. Currently, access to the Walthamstow reservoirs is by key-holder only, and access is controlled by a permit basis, such that the exposure of the reservoirs to human activity is very limited, unlike the rest of the Regional Park (much of which lies outside of the SPA/Ramsar). Policy SP1 (Managing Growth) states that *'The Council will expect development in the Growth Areas to:... Be in accordance with the full range of the Council's planning policies and objectives'*, thus ensuring for the protection of Internationally designated sites and biodiversity resources within the borough in accordance with SP13 (Open Space and Biodiversity). As such this impact pathway upon Lee Valley SPA and Ramsar site can be screened out.
- 4.2.6 It should be noted that there is an inherent conflict between Government policy to increase public access to the natural environment (as embodied in the Countryside and Rights of Way Act) and existing policy SP13 (Open Spaces and Biodiversity), and the requirements of internationally designated site management which often require visitor numbers to be controlled. Policy SP13 states 'Working with Lee Valley Regional Park Authority to protect and enhance access to the park, its waterside open spaces and habitats, recreational and sporting facilities.' Further details of the project at Walthamstow Wetlands (reservoir) are detailed as follows:
- 4.2.7 *'The Heritage Lottery Fund (HLF) approved the Walthamstow wetlands project in the summer of 2014 and confirmation of the grant was received in March 2014. The project, working with The London Borough of Waltham Forest and the London Wildlife Trust, will see the refurbishment of the Marine Engine House to create a café, exhibition space and an educational classroom, alongside a network of paths and two new access points to allow people to enjoy the site. Habitat creation and enhancement are also planned, to improve and enhance the biodiversity on site. Construction on site has started, including new native species planting along the Victorian reservoir banks and the banks of the River Lee. The spinal footpath running from the north to the south of the site has also been completed. The site is due to open formally to the public in 2017.'*⁴⁸
- 4.2.8 However, increased access to a site such as Walthamstow Reservoirs does not automatically lead to increased levels of disturbance, particularly if access is well designed and managed. The Walthamstow Wetlands project that provides this new access to the SPA and Ramsar site is supported by Natural England. The project will provide pathways with four access points and a viewing tower and visitor centre. The access pathways will consist of a single primary pathway running from north to south through the centre of the site. Secondary

⁴⁷ JNCC (2006). Lee Valley SPA Citation. <http://jncc.defra.gov.uk/pdf/SPA/UK9012111.pdf> [Accessed 18/09/15]

JNCC (2008). Information Sheet on Ramsar Wetlands: Lee Valley. <http://jncc.defra.gov.uk/pdf/RIS/UK11034.pdf> [Accessed 18/09/15]

⁴⁸ Thames Water. Access recreation and heritage (2015). <http://www.thameswater.co.uk/cr/Responsibleoperations/Accessrecreationheritage/index.html> [Accessed 22/10/15]

pathways will have the ability to be closed as required seasonally to account for sensitive features of the SPA and Ramsar site, and following monitoring. In addition to this, habitats within the wetland site will be enhanced.

- 4.2.9 As this project has the support of Natural England, it is assumed that Ultimately, the legal requirements of the Conservation (Natural Habitats &c) Regulations should override policy where such a conflict exists unless the policy is considered to represent an Imperative Reason of Overriding Interest as defined in the Regulations. As such, this impact pathway can be screened out.

Construction Activities

- 4.2.10 Disturbances from construction activities such as noise and visual disturbances have potential to result in likely significant effects upon internationally designated sites such as the Lee Valley SPA and Ramsar site features (wintering bittern, and migratory gadwall and shoveler). Alterations to policy SP2 (Housing) include for the provision of '*strategic improvements to, or renewal of, Haringey's housing estates*', this includes Northumberland Park (located approximately 440m north west of Lee Valley SPA and Ramsar site), and Leabank View / Lemsford Close area (located within 30m of Lee Valley SPA and Ramsar site). In addition to this, alterations to policy SP8 (Employment) identify locations for Local Employment Areas. These include Hale Wharf N17 (located within 15m from Lee Valley SPA and Ramsar site), Central Leaside (located 350m from the designated site), and South Tottenham (located 28m from the designated site).
- 4.2.11 Lee Valley internationally designated site is located within an urban area so will already be subject to existing levels of visual disturbance and noise and vibrations. However, impacts from construction and operational activities in close proximity to the designated site still have potential to impact upon the site's features. SP13 (Open Spaces and Biodiversity) includes the following text: '*All development shall protect and improve sites of biodiversity and nature conservation*'. Whilst this does not refer directly to internationally designated sites, it does provide for sufficient protection for biodiversity and nature conservation sites such as Lee Valley SPA and Ramsar site.
- 4.2.12 Recommendation:

It is recommended that text is included within SP13 (Open Spaces and Biodiversity) to include reference to construction activities within close proximity of the SPA and Ramsar site and specifically that each application will need to consider the requirement for sensitive construction management such as timings of works (outside of wintering bird season which is November to February), and any need for acoustic and visual screening as required if works are to be undertaken between November and February. In addition, the sites in close proximity to the SPA and Ramsar site should be designed so as not to cause visual or acoustic disturbance to the designated site during the development's operational phase.

In-combination with other projects and plans

- 4.2.14 As detailed above, access to the Walthamstow reservoirs is by key-holder only, and access is controlled by a permit basis, so the exposure of the reservoirs to human activity is very limited, and is managed. As a result, it can be concluded that recreational disturbance will not result in a likely significant effect alone or in-combination with other projects or plans.

4.3 Urbanisation

- 4.3.1 This impact is closely related to recreational pressure, in that urbanisation and recreational pressure both result from increased populations (including industrial and employment sites) within close proximity to sensitive sites. As such, Epping Forest SAC (located 3km from the London Borough of Haringey) is not linked to this impact pathway resulting from Haringey's Alterations to Strategic Policies document.
- 4.3.2 Given that the Lee Valley SPA and Ramsar sites lie immediately adjacent to the London Borough of Haringey boundary, it is theoretically vulnerable, from a geographic perspective, to the effects of urbanisation from development within Haringey. Lee Valley SPA and Ramsar

site is ecologically vulnerable, (via direct habitat degradation). However, it is unlikely that the SPA and Ramsar site's designated features would be directly vulnerable to urbanisation impacts, as they are species that favour aquatic environments. In addition, the features are unlikely to suffer from significant cat predation or fly tipping as the River Lee (River Lea) and River Lee Navigation flows along the eastern extent of the London Borough of Haringey, between the Borough and Lee Valley SPA and Ramsar acting as a barrier to the dispersal of cats from Haringey. In addition to this, Waltham Wetlands project will provide for greater public access to the site via a small network of routes. However, this will be restricted by walkways and vegetation planting. The project will not provide for increased vehicular access by the public within the designated site, thus reducing the likelihood of activities such as fly-tipping within the designated site. As such, this impact pathway can be screened out.

In-combination with other projects and plans

- 4.3.3 As noted above, the Waltham reservoirs are separated from the London Borough of Haringey by the presence of the River Lee, and River Lee Navigation. The eastern boundary of the reservoirs is separated from the London Borough of Walthamstow by the Lee Flood Relief Channel, which also prevents urbanisation impacting upon the Lee Valley designated sites. As such, likely significant effects both alone and in-combination with other projects and plans can be screened out.

4.4 Atmospheric pollution

- 4.4.1 As noted in Section 3.4: Table 3, parts of the Lee Valley SPA and Ramsar site are sensitive to deterioration in air quality, as the supporting habitat consists of features that can be degraded by excessive deposition of pollutants. All forms of development identified within Haringey's Amended Strategic Policies document have potential to lead to increases in vehicle emissions within 200m of Lee Valley SPA and Ramsar site, thus reducing air quality. Haringey's Amendment to Strategic Policies document, provides for an additional 11,602 net new dwellings to meet the strategic housing requirement (beyond the 8,200 detailed in Haringey's adopted Strategic Policies) (a total of 19,802 net new dwellings during the Plan period to 2026) (SP1 and SP2) with approximately 13,500 of the new dwellings located with Growth Areas (North Tottenham, Wood Green and Tottenham Hale) (provided within SP1- Managing Growth), and the inclusion of thirteen Local Employment Areas (provided within SP8- Employment). All these additions have potential to lead to increases in traffic along routes within 200m of the SPA and Ramsar site (A503 and A1055) and thus increases in air pollution.
- 4.4.2 Haringey's adopted Strategic Policies document includes policy text that aims to reduce air pollution, thus improving air quality. Policy SP7 (Transport), includes improvements to underground, overground and bus transportation within the Borough. It also provides policy text to promote travel demand management schemes to *'tackle climate change, improve local place shaping and public realm, and environmental and transport quality and safety'* such as *'minimising congestion and addressing the environmental impacts of travel; promoting public transport, walking and cycling (including minimum cycle parking standards); promoting road safety and pedestrian movement particularly in town centres and close to local services; promoting car sharing and establishing car clubs; seeking to locate major trip generating developments in locations with good access to public transport and so better integrate transport and land use planning; adopting maximum car parking standards and car free housing wherever feasible; seeking to mitigate the impact of road based freight and promote alternatives; supporting measures to influence behavioural change such as promoting low carbon vehicles; and requiring the submission of transport assessments and travel plans for large scale proposals in line with TfL guidance.'* This policy text, goes some- way to improve air quality. In addition to this, supporting text within Haringey's adopted Strategic Policies (para 4.4.8) notes that Haringey is an Air Quality Management Area (AQMA) for pollutants such as NO₂. The Council's Air Quality Action Plan outlines measures to aid in improving air quality, this is supported by the above policy text detailing the requirement for developers to submit transport assessments and travel plans.
- 4.4.3 Changes in air quality will occur wherever 'affected roads' are identified and increases in airborne pollutants from car exhausts and construction activities are possible. Effects of these

increases are limited to areas within 200m of the road (DMRB, Volume 11⁴⁹). The Air Pollution Information System (APIS) website provides details of critical loads of atmospheric pollution which if exceeded could lead to habitat damage. At this stage it is worth noting that both the breeding bittern (SPA feature) and the whorled water-milfoil (Ramsar feature) are not present within the Walthamstow reservoirs parcel of the Lee Valley internationally designated sites (as identified within SSSI citations). These two species are present within the northern parcel of the Lee Valley internationally designated sites, associated with the Turnford and Cheshunt Pits SSSI located approximately 9.5km north (in a straight line) from the London Borough of Haringey. As such, due to the distance involved, the air quality impact pathway to these vulnerable features cannot be linked to Haringey's Alterations to Strategic policies document and no likely significant effects will arise.

- 4.4.4 No critical loads are provided for the habitat 'open standing water' (water boatman, shoveler and gadwall features rely upon this habitat) to allow for an assessment. The APIS website states that *'No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often phosphorus limited; therefore decisions should be taken at a site specific level'*. In this case, no likely significant effects are anticipated since the Walthamstow reservoirs associated with the Lee Valley SPA and Ramsar site, like most freshwater environments, are essentially phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the growth of macrophytes and algae. The main source of phosphates is from wastewater, agriculture and mining. As such, these features (the water boatman, gadwall and shoveler) are not sensitive to pathways linked to air quality and there is no potential for likely significant effects to arise as a result of Haringey's Alterations to Strategic Policies document.
- 4.4.5 Further to this, transport modelling has been undertaken by the Council for the preparation of the Tottenham Area Action Plan (AAP). It is acknowledged that the numbers in the table are only AM peak flows so it is not possible to calculate AADT. However, the figures provided take into account all expected growth (not just that provided within the Tottenham AAP) and does provide a broad indication of whether flows are likely to go up or down as a result of the AAP and if so, to what degree. Tottenham is located adjacent to the SPA and Ramsar site. Results of the Transport modelling are illustrated in Table 4.

Table 4: Change in AM peak hour [08.00 – 09.00]

Road section	Do minimum	Do something	Change	% change
Ferry Lane (A503)	2100	1700	-400	-19
Watermead Way (A1055)	2280	1920	-360	-16
High Road, south Tottenham (A10)	2160	2230	+70	+3
Tottenham High Road	3130	2970	-160	-5

- 4.4.6 Table 4 illustrates that, taking into account all expected growth within Haringey and the surrounding authorities, AM peak flows will decrease by 19% on the A503 (the road that passes through the SPA and Ramsar site) over the plan period. Similarly, a 16% decrease is expected on the A1055 (the road located within 200m of the SPA and Ramsar site). The traffic modelling indicates that rather than resulting in a net increase in traffic flows along these sensitive roads (A503 and A1055); and hence reduced air quality, development over the plan period will in fact result in a decrease in transport flows along these sensitive routes in close proximity to the Lee Valley SPA and Ramsar site, and has potential to improve air quality along these sensitive transport routes.

In-combination with other projects and plans

- 4.4.7 As noted above, features that have potential to be sensitive to increases in air pollution are not present within the Waltham Reservoirs portion of the Lee Valley SPA and Ramsar site. As

⁴⁹ Design Manual for Roads and Bridges Volume 11 Section 3 part 1 air quality – procedure for assessing impacts.

such, there are no impact pathways present that will act alone or in combination, resulting in likely significant effects upon the Lee Valley SPA and Ramsar site. As such, this impact pathway can be screened out.

5 Conclusion

- 5.1.1 Haringey's Alterations to Strategic Policies document provides for meeting the strategic housing requirement of 19,802 new dwellings within the lifetime of the Plan (to 2026). The potential impact pathway of recreational pressure upon Epping Forest was screened out, both alone and in-combination with other projects or plans. Following assessment of Lee Valley SPA and Ramsar site, the potential impact pathway of disturbance (from recreational pressure), urbanisation, water abstraction, water quality and air quality were also screened out, both alone and in-combination with other projects or plans. The impact pathway of disturbance to avian features from construction activities is a residual impact pathway as development is proposed within close proximity to the SPA and Ramsar site. The following recommendation is made:
- 5.1.2 'It is recommended that text is included within SP13 (Open Spaces and Biodiversity) to include reference to construction activities within close proximity of the SPA and Ramsar site and the need for sensitive construction management such as timings of works (outside of wintering bird season which is November to February), and the need for acoustic and visual screening as required if works are to be undertaken between November and February. In addition, the sites in close proximity to the SPA and Ramsar site should be designed so as not to cause visual or acoustic disturbance to the designated site during the development's operational phase.'
- 5.1.3 Provided Haringey's Alterations to Strategic Policies document provides clear measures to address potential disturbance to bird features resulting from construction activities, then Haringey's Alterations to Strategic Policies document can be screened from further assessment and no likely significant effects upon internationally designated sites will result, either alone or in combination with other projects or plans.

Appendix A. Background of Internationally Designated Sites

A.1 Lee Valley SPA and Ramsar site

A.1.1 Introduction

The Lee Valley SPA is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris*. Lee Valley SPA is split into two sections, a northern and a southern. The southern section is located adjacent to the eastern boundary of the London Borough of Haringey. It contains Walthamstow Reservoir SSSI and Walthamstow Marshes SSSI. The northern section is located approximately 9.5km north of the Borough which contains Turnford and Chestnut Pits SSSI.

A.1.2 Qualifying Features

The site qualifies as an **SPA** for the following Annex I species:

- Wintering bittern *Botaurus stellaris*. 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)
- Migratory gadwall *Anas strepera*. 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
- Migratory shoveler *Anas clypeata*. 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)

The site qualifies under the following **Ramsar** criterion

Criterion 2: The site supports the nationally scarce plant species:

- whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Criterion 6: Species/populations occurring at levels of international importance.

Species with peak counts in spring/autumn:

- Northern shoveler, *Anas clypeata*, (NW & C Europe) 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9- 2002/3)

Species with peak counts in winter:

- Gadwall, *Anas strepera strepera*, (NW Europe) 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3)

A.1.3 Conservation Objectives of the SPA

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; the extent and distribution of the habitats of the qualifying features.

- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

A.1.4 Environmental Vulnerabilities

- Water quality: eutrophication from waste water. This is being addressed by AMP3 funding under the urban Waste Water Treatment Directive
- Water quantity: over extraction of surface water for public consumption, notably during drought periods. This is managed via Environment Agency Review of Consents.
- Recreational pressure: this is managed by zoning of waterbodies within the Lee Valley Regional Park.

A.2 Epping Forest SAC

A.2.1 Introduction

Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains and scattered wetland. The semi-natural woodland is particularly extensive, forming one of the largest coherent blocks in the country. Most is characterised by groves of over-mature pollards and these exemplify all three of the main wood-pasture types found in Britain: beech-oak, hornbeam-oak and mixed oak. The Forest plains are also a major feature and contain a variety of unimproved acid grasslands which have become uncommon elsewhere in Essex and the London area. In addition, Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

A.2.2 Qualifying Features

The site is designated as an **SAC** for the following features:

Annex I habitats:

- Atlantic *acidophilous* beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*); Beech forests on acid soils
- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

Annex II species:

- Stag beetle *Lucanus cervus*

A.2.3 Conservation Objectives of the SAC

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

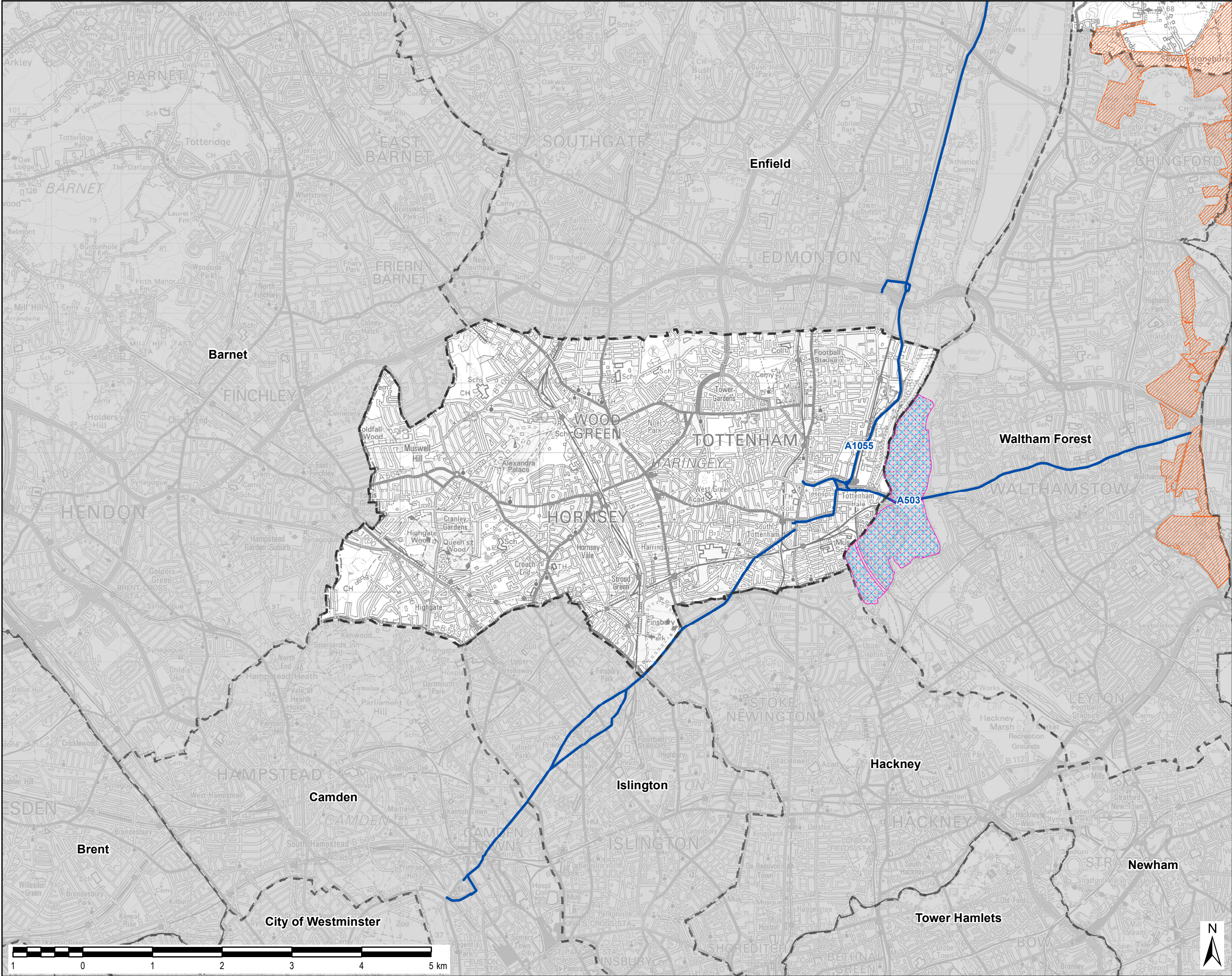
A.2.4 Environmental Vulnerabilities

- Habitat management: After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995.
- Atmospheric pollution
- Lack of deadwood

Appendix B. Figures

Figure 1: Locations of Internationally Designated Sites

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THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Haringey Borough Boundary
- Lee Valley Ramsar Site
- Lee Valley Special Protection Area
- Epping Forest Special Area of Conservation
- A Road
- London Borough Boundary

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Purpose of Issue
DRAFT

Client
HARINGEY COUNCIL

Project Title
HARINGEY HRA

Drawing Title
HARINGEY COUNCIL ENVIRONMENTAL DESIGNATIONS

Drawn S. Masnikosa	Checked J. Waters	Approved I. Hoffman	Date 13/10/2015
AECOM Internal Project No. 47076094		Scale @ A3 1:50,000	

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Appendix C. Screening Table of Haringey's Alteration to Strategic Policies Document

Policies identified in green have been screened from any further assessment due to a lack of realistic impact pathways. Please note that only amendments to policies (rather than supporting text) have been assessed below.

Policies identified in orange have been screened in for further assessment as there is potential for impact pathways to affect internationally designated sites, resulting in likely significant effects.

Regulation 18 amendments: (Text proposed to be inserted in bold black underlined), (Text proposed to be removed in ~~red strikethrough~~)

Regulation 19 further amendments: (New proposed text inserted in bold grey underlined), (Regulation 18 text now proposed to be deleted ~~bold black strikethrough underlined~~), (Text proposed to be removed in ~~red double strikethrough~~)

Table 1: Screening of Haringey's Alteration to Strategic Policies Document

Alteration Ref	Section	Policy/Para	Proposed change	HRA implications
Alt30	3.1	Policy SP1: Managing Growth	<i>Amend Policy SP1 to read as follows:</i> The Council will focus Haringey's growth in the most suitable locations, and manage it to make sure that the Council delivers the opportunities and benefits and achieve strong, healthy and sustainable communities for the whole of the borough. The Council will maximise the supply of additional housing to meet and exceed <u>its strategic housing requirement of 19,802 homes over the plan period 8,200 homes</u> from 2011-~~2021~~ <u>2026</u> (~~820 per annum~~). The Council will promote development in the following Growth Areas: - Haringey Heartlands; ~~and~~ <u>Wood Green Metropolitan Town Centre;</u> - Tottenham Hale; ~~and~~ <u>North Tottenham (which includes Northumberland Park, the redevelopment of Tottenham Hotspur Football Stadium, and High Road West).</u> The Council will expect development in the Growth Areas to: - Provide approximately <u>13,500</u> ~~13,000~~ <u>5,000</u> new homes and the majority of new business floorspace up to 2026; - Maximise site opportunities; - Provide appropriate links to, and benefits for, surrounding areas and communities; - Provide the necessary infrastructure; and	HRA implications The main changes to this policy reflect the new strategic housing target of 1,502 homes per annum for the Borough in the London Plan for the period 2015 – 2025. This includes an increase in housing provision from 8,200 new homes to the end of the Plan period to 19,802 new homes. In addition the end of the Plan Period has changed from 2021 to 2026. An additional main modification is to the number of new homes provided within Growth Areas, from 5000 to 13,500 up to 2026. Impact pathways present include: - Urbanisation; - Disturbance (from recreational and construction activities); - Air quality; - Water abstraction; and - Water quality.

			- Be in accordance with the full range of the Council's planning policies and objectives. The Council will promote development in the following Areas of Change: ~~Wood Green Metropolitan Town Centre;~~ ~~Northumberland Park (which includes the redevelopment of Tottenham Hotspur Football Stadium);~~ - Tottenham High Road Corridor; and - Seven Sisters Corridor. Parts of the borough outside of the Growth Areas and Areas of Change will experience some development and change <u>in contributing towards meeting local development needs</u>. The Council will ensure that development in these Areas of Limited Change will respect the character of its surroundings and provide environmental improvements and services.	
Alt47	3.2	Policy SP2: Housing	<i>Amend the first paragraph of Policy SP2 to read as follows:</i> The Council will aim to provide homes to meet Haringey's housing needs and to make the full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the target of ~~8,200 homes from 2011-21 (820 units per annum)~~ <u>19,802 homes from 2011-2026 (820 units from 2011-2014 and 1,502 units from 2015-2026).</u>	HRA implications This modification repeats the changes in SP1. It is a factual update based on the latest London Plan strategic housing requirement target figure for the Borough increasing the number of net new dwellings to 19,802 to 2026. Impact pathways present include: - Urbanisation; - Disturbance (from recreational and construction activities); - Air quality; - Water abstraction; and - Water quality.
Alt48	3.2	Policy SP2: Housing	<i>Amend Policy SP2 (2) to read:</i> ~~Complies with~~ <u>is designed having regard to</u> the housing design standards and space standards set out in ~~the Council's Housing SPD 2009 and adopts the GLA housing space and child play space standards 2009 as Haringey's own standards.~~ <u>the Mayor's Housing SPG (2012) and the London Plan and the play space standards set out in the Mayor's Play and Informal Recreation SPG 2012;</u>	No HRA implications. This modification is related to housing design. There are no impact pathways present.
Alt49	3.2	Policy SP2: Housing	<i>Amend Policy SP2 (5) to read:</i> Subject to viability, sites capable of delivering 10 units of more will be required to meet a borough wide affordable housing target of ~~50~~ <u>40</u>%, based	No HRA implications. This modification is related to the amount of affordable housing provided. There are no

			on habitable rooms¹; <i>Insert the following footnote:</i> ¹ <u>This equate to approximately 7,920 affordable dwellings over the plan period to 2026.</u>	impact pathways present.
Alt50	3.2	Policy Housing	SP2: <i>Amend Policy SP2 (6) to read:</i> Delivering an affordable housing tenure split of ~~70%~~ <u>60%</u> affordable rent (including social rent) and ~~30%~~ <u>40%</u> intermediate housing;	No HRA implications. This modification is related to the tenure of affordable housing. There are no impact pathways present.
Alt52	3.2	Policy Housing	SP2: <i>Amend Policy SP2 (8) to read:</i> The preferred affordable housing mix, in terms of unit size and type of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing needs, as set out in the <u>Haringey</u> Housing ~~Strategy~~ <u>SPD</u>.	No HRA implications. This demonstrates a factual change in the name of a document. There are no impact pathways present.
Alt53	3.2	Policy Housing	SP2: <i>Insert the following additional policy following Policy SP2 (10):</i> <u>~~The regeneration of Haringey's Housing estates~~ renewal and improvement</u> <u>The Council will bring forward a programme to undertake regeneration strategic improvements to, or renewal of, Haringey's housing estates, with priority being accorded to those located within wider regeneration proposals and/or identified as being most in need. An initially list is set out below:</u> • <u>Northumberland Park</u> • <u>Love Lane</u> • <u>Taymar and Reynardson</u> • <u>~~Helston Court / Culvert Road~~</u> • <u>Turner Avenue</u> • <u>Leabank View / Lemsford Close</u> • <u>Park Grove and Durnsford Road</u> • <u>Tunnel Gardens, including Blake Road</u> • <u>Noel Park</u> • <u>Broad Water Farm</u>	Potential HRA implications. It is noted that as an example, the Northumberland Park area is located in close proximity to the Lee Valley internationally designed site. It is assumed that any increase in net number of dwellings will be included within the 19,802 advised above. Northumberland Park is located approximately 440m north west of Lee Valley SPA and Ramsar site, and Leabank View / Lemsford Close are located within 30m of Lee Valley SPA and Ramsar site Impact pathways potentially present are: • Disturbance (from construction activities). • Water quality from construction and operational phase of development.
Alt67	4.3	Policy Waste and Recycling	SP6: <i>Amend the 7th bullet point of the Policy to read as follows:</i> • Continue working with its partners in the North London Waste Authority to adopt the North London Waste Plan (NLWP) which has identified locations suitable for waste management facilities to meet the London	No HRA implications. This is a factual update to reflect the new apportionment targets for North London and Haringey in the Further Alterations to the

			Plan apportionment of ~~1.9~~ <u>2.1m</u> tonnes and the Haringey apportionment of ~~237,000~~ <u>182,000</u> tonnes.	London Plan. There are no impact pathways present.
Alt70	5.1	Policy SP8: Employment	<i>Amend the first paragraph of the Policy to read:</i> The Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites, ~~and~~ Local Employment Areas <u>and other non-designated employment sites.</u>	No HRA implications. This is a minor change to wording to ensure the policy addresses the full complement of employment land in the borough. There are no impact pathways present.
Alt71	5.1	Policy SP8: Employment	<i>Amend the first bullet point of the Policy to read:</i> Protect B uses (under the Use Classes Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand ~~of 137,000m²~~ <u>32,000 m²</u> for an additional 23,000 m² of <u>employment</u> floorspace up to ~~2026~~ <u>2031</u>;	No HRA implications This change reflects new evidence from Haringey's Employment Land Study (2014). This is a reduction of proposed employment floorspace to the initial 137,000m² to 23,000m². There are no impact pathways present.
Alt72	5.1	Policy SP8: Employment	<i>Amend the list of Locally Significant Industrial Sites within the Policy as follows:</i> ~~• Crusader Industrial Estate, N15;~~ ~~• High Road West, N17;~~ ▪ Vale Road/Tewksbury Road (Part), N15; ~~and~~ ▪ White Hart Lane, N17; <u>and</u> ▪ <u>Willoughby Lane, N17.</u>	No HRA implications. This reflects changes to LSIS set out in the Site Allocations and Tottenham Area Action Plan documents. There are no impact pathways present.
Alt73	5.1	Policy SP8: Employment	<i>Under the sub-heading 'Local Employment Areas' amend the second bullet point of the Policy to read:</i> However, the approach to mixed uses in Regeneration Areas must have regard to London Plan town centre and retail policies, so not to encourage retail development outside of town centres, <u>as well as other Local Plan policies.</u>	No HRA implications. This change reflects that additional requirements for development within LEA will be included in other Local Plan documents. There are no impact pathways present.
Alt110	5.1	Policy SP8: Employment	<i>In the part of the policy on Local Employment Areas, add in the employment sites classified as Employment Land or Regeneration Area, as follows:</i> Employment Land (EL) is land that is deemed acceptable for other employment generating uses that complement the traditional 'B' use classes, such as a small scale "walk-to-retail", cafes and crèche/nursery. <u>Local Employment Areas classified as EL are:</u>	Potential HRA implications. Hale Wharf is located within 15m from Lee Valley SPA and Ramsar site, Central Leaside is located 350m from the designated site, and South Tottenham is located 280m from the designated site.

			- <u>Bound Green Industrial Estate;</u> - <u>Frien Barnet Sewage Works.</u> • A Regeneration Area (RA) is the most flexible of the categories as it can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses. However, the approach to mixed uses in Regeneration Areas must have regard to London Plan town centre and retail policies, so not to encourage retail development outside of town centres, <u>as well as other Local Plan policies</u>. <u>Local Employment Areas classified as RA are:</u> - <u>Campsbourne, N8</u> - <u>Central Leaside (Part SIL/RA), N17</u> - <u>Crusader Industrial Estate, N15</u> - <u>Hale Wharf, N17</u> - <u>High Road East, N17</u> - <u>High Road West, N17</u> - <u>Rangemoor Road and Herbert Road, N15</u> - <u>South Tottenham, (Part LSIS/RA), N15</u> - <u>Tottenham Hale, (Part SIL/RA), N17</u> - <u>Vale Road / Tewkesbury Road (Part LSIS/RA), N15</u> - <u>Wood Green, N22</u>	Impact pathways potentially present are: • Disturbance (from construction activities). • Water quality from construction and operational phase of development.	
Alt111	6.3	SP13	Amend the bullet point to read as follows: ▪ Implementation of the <u>Haringey Green Grid</u> ~~borough's green infrastructure~~ projects (such as Lordship Recreation Ground Improvements);	No HRA implications. This text change introduces the concept of the Haringey Green Grid, which builds upon the all London Green Grid and, therein, the Lea Valley & Finchley Ridge Area Framework. Responds to the representation by Natural England. There are no impact pathways present	
Alt80	8.2	Policy SP17: Delivering and Monitoring	<i>Amend the fifth bullet point of the policy to read:</i> Infrastructure Delivery Plan and S106 policy including the development S106 tariffs and ~~a possible~~ community infrastructure levy;	No HRA implications. To reflect the adoption and implementation of Haringey's Community Infrastructure Levy. There are no impact pathways present.	

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Habitats Regulations Assessment Screening Report – Haringey's Proposed Submission Development Management Policies Consultation Document December 2015

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1 Introduction

1.1 Background to the project

- 1.1.1 AECOM has been appointed by London Borough of Haringey (referred to as “Haringey Council” and “the Authority”) to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of the Proposed Submission Development Management Policies (DMPs) Consultation Document December 2015 (known henceforth as “DMP(s)”) on the Natura 2000 network and Ramsar sites in support of the Haringey's Local Plan: Strategic Policies documents.
- 1.1.2 The Haringey Local Plan: Strategic Policies document was formally adopted by the Full Council on 18th March 2013. The Local Plan, along with the saved UDP policies (Unitary Development Plan), sets out a vision and key policies for the future development within the Borough from 2013 through to the end of the plan period (2026). It provides special policies outlining local and strategic development within the Borough, including housing, employment, leisure, and retail provision. In support of the Local Plan, in 2010 a Habitats Regulations Assessment was undertaken¹. In February 2015, an update to Haringey's Strategic Policies (Alterations to Strategic Policies document) was published for public consultation. The Alterations to Strategic Policies document reflected the increase in the Borough's strategic housing delivery target of 19,802 net new dwellings 2011- 2026; new Growth Areas; strategic improvements to, or renewal of, Haringey's housing estates; an additional Locally Significant Industrial Site; and Local Employment Areas. HRA has been undertaken of this document (subject to consultation), which screened out most impact pathways, with the residual likely significant effect remaining of disturbance to internationally designated features from construction activities². These HRA documents will be used as a basis for this assessment. These documents undertook Habitats Regulations Assessment (HRA) of the following internationally designated sites: The Lee Valley Ramsar Site; The Lee Valley SPA; and Epping Forest SAC. The objective of this assessment is to:
- identify any aspects of Haringey's Proposed Submission DMP Consultation Document December 2015 that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites or internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites³), either in isolation or in combination with other plans and projects; and
 - advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

1.2 Current legislation

- 1.2.1 The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 Within the UK, Protected Areas for nature conservation include, those established under National legislation (e.g. Sites of Special Scientific Interest (SSSI)), areas established under European Union Directives/European initiatives (including the Natura 2000 network of sites), and protected areas established under Global Agreements (e.g. Ramsar sites).

¹ Hyder. (2010). London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment. http://www.haringey.gov.uk/sites/haringeygovuk/files/habitats_regulations_assessment.pdf [Accessed 23/09/15]

² AECOM (2015). Habitats Regulations Assessment Screening Report – Alterations to Haringey's Strategic Policies

³ Wetlands of International Importance designated under the Ramsar Convention 1979

- 1.2.3 With relevance to this report, Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. Special Areas of Conservation (SAC) are strictly protected sites designated under Article 3 of the EC Habitats Directive, which requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended)⁴. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). Ramsar sites are wetlands of international importance designated under the Ramsar Convention.
- 1.2.4 The Conservation of Habitats and Species Regulations 2010 require that land use plans are subject to Appropriate Assessment (AA) where they are likely to have a significant effect on a Natura 2000 site.
- 1.2.5 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network is maintained.
- 1.2.6 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Figure 1: The Legislative Basis for Appropriate Assessment

⁴ <http://jncc.defra.gov.uk/>

- 1.2.7 Over the years the phrase 'Habitats Regulations Assessment' has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'appropriate assessment'. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.3 Scope of the Project

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of a HRA of a supporting Local Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:
- All sites within the Local Plan area boundary; and
 - Other sites shown to be linked to development within the Borough boundary through a known 'pathway'.
- 1.3.2 Briefly defined, pathways are routes by which a change in activity within the Local Plan area can lead to an effect upon a European site. In terms of the second category of European site listed above, guidance from the former Department of Communities and Local Government states that the HRA should be '*proportionate to the geographical scope of the [plan policy]*' and that '*an AA need not be done in any more detail, or using more resources, than is useful for its purpose*' (CLG, 2006, p.6).
- 1.3.3 No Internationally designated sites are located within the London Borough of Haringey's boundary.
- 1.3.4 The following internationally designated sites considered within the Habitats Regulations Assessment of Haringey's draft DMP are located within 20km of the London Borough of Haringey's authority boundary, and as such could potentially have impact pathways present resulting from the draft DMP:
- Lee Valley SPA and Ramsar site;
 - Epping Forest SAC;
 - Richmond Park SAC;
 - Wimbledon Common SAC; and
 - Wormley-Hoddesdonpark Woods SAC.
- 1.3.5 During an initial sieving exercise to screen out internationally designated sites (e.g. no realistic impact pathways present), the following internationally designated sites can be sieved out from further assessment due to the distances involved.
- Epping Forest SAC, located 3km east from London Borough
 - Wormley-Hoddesdonpark Woods SAC located 12.9km from the borough boundary;
 - Richmond Park SAC located 14.3km from the borough boundary, and;
 - Wimbledon Common SAC located 14.7km from the borough boundary.
- 1.3.6 These sites are not considered further within this document.
- 1.3.7 There is one set of internationally designated sites that are located within a sufficiently close distance that the presence of impact pathways linking to Haringey's draft DMP cannot be screened out. These are:
- Lee Valley SPA and Ramsar site, located immediately adjacent to the London Borough to the east.

- 1.3.8 Details of Lee Valley SPA and Ramsar sites can be found in Chapter 3. Appendix A, Figure 1 illustrates the location of the internationally designated site in relation to the London Borough of Haringey's boundary.
- 1.3.9 The Habitats Regulations Assessment undertaken for the Local Plan in 2010⁵ and of the Alterations to Haringey's Strategic policies document (subject to consultation)⁶, identified only one impact pathway linking the London Borough of Haringey Local Plan to the Lee Valley SPA and Ramsar site. The residual impact pathway was disturbances from construction activities, impacting on avian features of the designated site. These Local Plan HRA documents should be referred to for further background to this DMP.
- 1.3.10 The remainder of this document considers potential for likely significant effects from impact pathways resulting from Haringey's DMP upon the following internationally designated sites:
- Lee Valley SPA and Ramsar sites

1.4 This Report

- 1.4.1 Chapter 2 of this report summarises the methodology for the assessment. Chapter 3 outlines details of the internationally designated sites, including, features and conservation objectives identifies. Chapter 4 discusses the possible pathways by which adverse effects on internationally designated sites could arise and considers each Development Management Policy (DMP) identified within the screening assessment undertaken in Appendix B (Table 1) likely significant effects, based on key environmental conditions required to maintain the integrity of these sites. The screening exercise concludes by either screening out any possible impacts or by determining that mitigation or avoidance measures are required. Where mitigation strategies are deemed necessary, potential approaches are discussed. In combination effects with other plans on each European site are also considered within Chapter 4. Figure 1 of Appendix A presents a map showing all internationally important wildlife sites discussed.

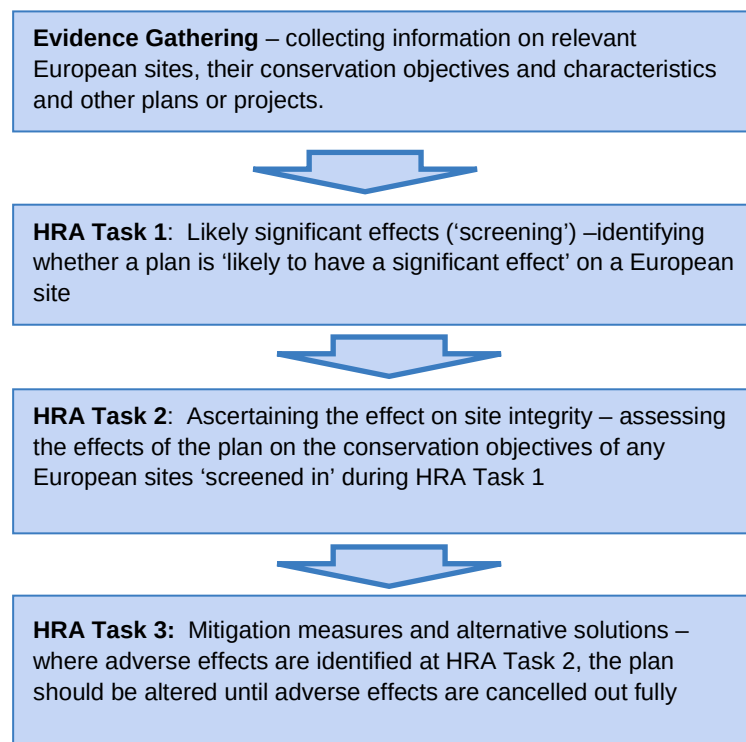
⁵ Hyder. (2010). London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment. http://www.haringey.gov.uk/sites/haringeygovuk/files/habitats_regulations_assessment.pdf [Accessed 23/09/15]

⁶ AECOM (2015). Habitats Regulations Assessment Screening Report – Alterations to Haringey's Strategic Policies

2 Methodology

2.1 Introduction

- 2.1.1 The HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist⁷. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006⁸. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁹ as has the RSPB¹⁰. Both of these have been referred to alongside the guidance outlined in Section 1.2 in undertaking this HRA.
- 2.1.2 Figure 2 below, outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.



Source: CLG, 2006

⁷ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁸ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁹ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

¹⁰ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

Figure 2- Four-Stage Approach to Habitats Regulations Assessment

2.2 HRA Task 1 - Likely Significant Effects (LSE)

- 2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites. This stage is the subject of Chapter 4 of this report (See Appendix B, Table 1 for the screening table of DMPs), and goes a step further than a scoping report that was able to scope out sites listed in paragraph 1.3.5. Those particular sites could be scoped out regardless of the nature and scale of any proposed development, whereas screening is needed where there is a potential pathway of impact and the scale, nature and location of development determines whether this actually exists.
- 2.2.3 The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the former Department of Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

2.3 Confirming Other Plans and Projects That May Act In Combination

- 2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the internationally designated site(s) in question.
- 2.3.2 It is neither practical nor necessary to assess the 'in combination' effects of the DMPs within the context of all other plans and projects within this area of England. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial allocations proposed for neighbouring and nearby authorities over the lifetime of the DMP. A good place to start is the London Plan (2015)¹¹

Table 1: Housing Levels to be Delivered in Neighbouring Authorities

Local Authority	Total housing (taken from the London Plan, 2015 ¹²) Minimum ten year target 2015-2025	Total housing (taken from the London Plan, 2015) Annual monitoring target 2015-2025
London Borough of Barnet	23,489	2,349
London Borough of Camden	8,892	889
London Borough of Enfield	7,976	798
London Borough of Islington	12,641	1,264
London Borough of Hackney	15,988	1,599
London Borough of Waltham Forest	8,620	862

¹¹ Mayor of London (March, 2015). The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011.

¹² Mayor of London (March, 2015). The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011

- 2.3.3 There are other plans and projects that are relevant to the 'in combination' assessment and the following have all been taken into account in this assessment:

Plans

- **London Borough of Haringey Local Plan: Strategic Policies.** Adopted March 2013.
- **London Borough of Haringey Local Plan: Alterations to Strategic Policies.** September 2015 (not yet subject to consultation).
- **The London Plan.** The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Published March 2015.
- **The London Plan.** Sub Regional Development Framework – North London. Published May 2006.
- **The London Plan.** Sub Regional Development Framework – Central London. Published May 2006.
- **North London Waste Plan.** This is currently in preparation; the draft is due for consultation in 'Summer/ Autumn 2015'.
- **London Borough of Barnet Local Plan Core strategy DPD.** Adopted September 2012.
- **London Borough of Camden Core Strategy.** Adopted November 2010.
- **London Borough of Enfield Core Strategy.** Adopted November 2010.
- **London Borough of Islington Core Strategy.** Adopted February 2011.
- **London Borough of Hackney Core Strategy: Local Development framework.** Adopted December 2010.
- **London Borough of Waltham Forest Local Plan Core Strategy.** Adopted March 2012
- **Walthamstow Wetlands.** Planning permission granted 2014.

- 2.3.4 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

3 Internationally Designated Sites, Interest Features and Conservation Objectives

3.1 Introduction

- 3.1.1 The Lee Valley SPA is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris*. Lee Valley SPA is split into two sections, a northern and a southern. The southern section is located adjacent to the eastern boundary of the London Borough of Haringey. It contains Walthamstow Reservoir SSSI and Walthamstow Marshes SSSI. The northern section is located approximately 9.5km north of the Borough which contains Turnford and Chestnut Pits SSSI.

3.2 Qualifying Features

- 3.2.1 The site qualifies as an **SPA** for the following Annex I species:
- Wintering bittern *Botaurus stellaris*. 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)
 - Migratory gadwall *Anas strepera*. 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
 - Migratory shoveler *Anas clypeata*. 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)
- 3.2.2 The site qualifies under the following Ramsar criterion
- 3.2.3 *Criterion 2*: The site supports the nationally scarce plant species:
- whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).
- 3.2.4 *Criterion 6*: Species/populations occurring at levels of international importance.
- 3.2.5 Species with peak counts in spring/autumn:
- Northern shoveler, *Anas clypeata*, (NW & C Europe) 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9- 2002/3)
- 3.2.6 Species with peak counts in winter:
- Gadwall, *Anas strepera strepera*, (NW Europe) 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3)

3.3 Conservation Objectives of the SPA

- 3.3.1 Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; the extent and distribution of the habitats of the qualifying features.
- The structure and function of the habitats of the qualifying features
 - The supporting processes on which the habitats of the qualifying features rely
 - The population of each of the qualifying features, and,
 - The distribution of the qualifying features within the site.

3.4 Environmental Vulnerabilities

- Water quality: eutrophication from waste water. This is being addressed by AMP3 funding under the urban Waste Water Treatment Directive
- Water quantity: over extraction of surface water for public consumption, notably during drought periods. This is managed via Environment Agency Review of Consents.
- Recreational pressure: this is managed by zoning of waterbodies within the Lee Valley Regional Park.

4 Likely Significant Effects

4.1 Introduction

- 4.1.1 In carrying out an HRA it is important to determine the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with internationally designated sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development (Plan) can lead to an effect upon an internationally designated site. Following the HRA of the Local Plan (Strategic Policies in 2010 and Alterations to Strategic Policies in 2015), and a brief sieve of the DMPs, the following impact pathways are considered within this document.
- 4.1.2 Impact pathways for consideration are:
- Disturbance from construction activities
 - Collision risk with proposed buildings
- 4.1.3 The screening assessment (see Appendix B, Table 1) identified a single policy that has potential to result in impact pathways that link to Lee Valley SPA and Ramsar site's avian features. This is Policy DM6 (Building Heights).
- 4.1.4 This policy provides for tall buildings. Map 2.2 of the policy indicative locations for tall buildings, with provision for mid-high rise buildings within 150m east of Lee Valley SPA and Ramsar site. This has potential to cause disturbance to avian bird features of the internationally designated site (sites such as shoveler, gadwall and bittern) during the construction phase of the development and an increased risk of collisions by bird features of the SPA and Ramsar site, both during the construction and operational phase.

4.2 Disturbance from Construction Activities

- 4.2.1 As previously noted, the Lee Valley SPA and Ramsar site lies immediately adjacent to the London Borough of Haringey and is theoretically vulnerable, to the effects of disturbances from construction activities resulting from development in close proximity to the internationally designated site within Haringey.
- 4.2.2 It is therefore necessary to perform a further screening assessment to determine whether Haringey's DMP contains policy measures that could lead to a likely significant effects, either alone or 'in combination' with other plans and projects, through disturbance from construction activities, on this internationally designated site.
- 4.2.3 Construction activities within close proximity of an internationally designated site have potential to:
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl resulting from visual and acoustic disturbances.
- 4.2.4 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding¹³. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately the survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds¹⁴.
- 4.2.5 The potential for disturbance may be less in winter than in summer. In addition, the consequences of disturbance at a population level may be reduced because birds are not

¹³ Riddington, R. *et al.* 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

¹⁴ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) activity (recreational) can result in quantifiable disturbance:

- Underhill et al¹⁵ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
- Evans & Warrington¹⁶ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to displacement of birds resulting from greater recreational activity on surrounding water bodies at weekends relative to week days.
- Tuite et al¹⁷ used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that on inland water bodies shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.
- Pease et al¹⁸ investigated the responses of seven species of dabbling ducks to a range of potential causes of disturbance, ranging from pedestrians to vehicle movements. They determined that walking and biking created greater disturbance than vehicles and that gadwall were among the most sensitive of the species studied.
- A three-year study of wetland birds at the Stour and Orwell SPA, Ravenscroft¹⁹ found that walkers, boats and dogs were the most regular source of disturbance. Despite this, the greatest responses came from relatively infrequent events, such as gun shots and aircraft noise. Birds seemed to habituate to frequent 'benign' events such as vehicles, sailing and horses, but there was evidence that apparent habituation to more disruptive events related to reduced bird numbers – i.e. birds were avoiding the most frequently disturbed areas. Disturbance was greatest at high tide and on the Orwell, but birds on the Stour showed greatest sensitivity.

4.2.6 However the outcomes of many of these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their population²⁰. A literature review undertaken for the RSPB²¹ also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to

¹⁵ Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

¹⁶ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pitlake near London. *International Journal of Environmental Studies* 53: 167-182

¹⁷ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

¹⁸ Pease, M.L., Rose, R.K. & Butler, M.J. 2005. Effects of human disturbances on the behavior of wintering ducks. *Wildlife Society Bulletin* 33 (1): 103-112.

¹⁹ Ravenscroft, N. (2005) Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. Era report 44, Report to Suffolk Coast & Heaths Unit.

²⁰ Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, 97, 265-268

²¹ Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on internationally designated sites.

- 4.2.7 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration (such as those often associated with construction activities). Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 4.2.8 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.

- 4.2.9 Disturbances from construction activities such as noise and visual disturbances have potential to result in likely significant effects upon avian features of an internationally designated site such as the Lee Valley SPA and Ramsar site features (wintering bittern, and migratory gadwall and shoveler). Construction activities associated with land in close proximity to the internationally designated site identified within Map2.2 of Policy DM6 have the potential to result in these disturbances.
- 4.2.10 Lee Valley internationally designated site is located within an urban area so will already be subject to existing levels of visual and acoustic disturbance. However, impacts from construction and operational activities in close proximity to the designated site still have potential to impact upon the site's features.
- 4.2.11 DMP 19 (Nature Conservation) states the following:
- 4.2.12 *'A. Development proposals on sites which are, or are adjacent to, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance the nature conservation value of the site.'*
- 4.2.13 *'B. Development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused.'*
- 4.2.14 This policy does provide some protection for conservation sites. Whilst it is noted that there are no internationally designated conservation sites within the Borough, Lee Valley SPA and Ramsar site is located immediately adjacent to the Borough. For robustness, it is recommended that DM19 also include reference to internationally designated sites.
- 4.2.15 Guidance from the former Department of Communities and Local Government states that the HRA should be *'proportionate to the geographical scope of the [plan policy]'* and that *'an AA need not be done in any more detail, or using more resources, than is useful for its purpose'* (CLG, 2006, p.6). More recently, the Court of Appeal ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *'achieved in practice'* to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy). In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'*. As such, it is valid to defer site specific screening of disturbances resulting from construction activities to the project planning stage of the application. As mitigation such as appropriate timing of works, pertinent choice of machinery and the use of acoustic and visual hording are feasible mitigation measures that could be incorporated within the project specific Planning Application to prevent likely significant effects from resulting. As such, this impact pathway can be screened out from further consideration, both alone, and in-combination with other projects or plans.

4.3 Collision risk

- 4.3.1 High-rise and mid high-rise buildings identified in Map 2.2 of DM6 (Building Heights) are located to the west and south west of Lee Valley SPA and Ramsar site. There is potential for avian features of the SPA and Ramsar site to collide with these proposed new tall structures.
- 4.3.2 Stoke Newington reservoir is located approximately 1.6km south west of the Lee Valley internationally designated sites and supports avian features for which the Lee Valley is designated such as gadwall and shoveler. As such, bird species associated with the Lee Valley designated site are likely to fly over the area identified in DM6, Map 2.2. The area between Stoke Newington reservoirs and those associated with the Lee Valley is already an urban built up area with high rise buildings, including three high rise buildings (at least 15 stories in height) along Bethane Road adjacent to Stoke Newington Reservoir to the north east. In addition to this, the main fly-way for bird features of the SPA and Ramsar site (shoveler, gadwall and bittern) is along the Lee Valley, north and south of the SPA and Ramsar site. As such, it is unlikely that a significant portion of bird features will fly in a south

westerly direction towards Stoke Newington Reservoirs and the proposed tall buildings. Due to these two factors, it can be considered that the construction of the tall buildings identified within Map 2.2 of DM6 (Building Heights), will not result in likely significant effects upon the bird features of Lee Valley SPA and Ramsar site. As such, this impact pathway can be screened out both alone, and in-combination with other projects or plans.

5 Conclusion

5.1.1 Impact pathways assessed against Lee Valley SPA and Ramsar site are:

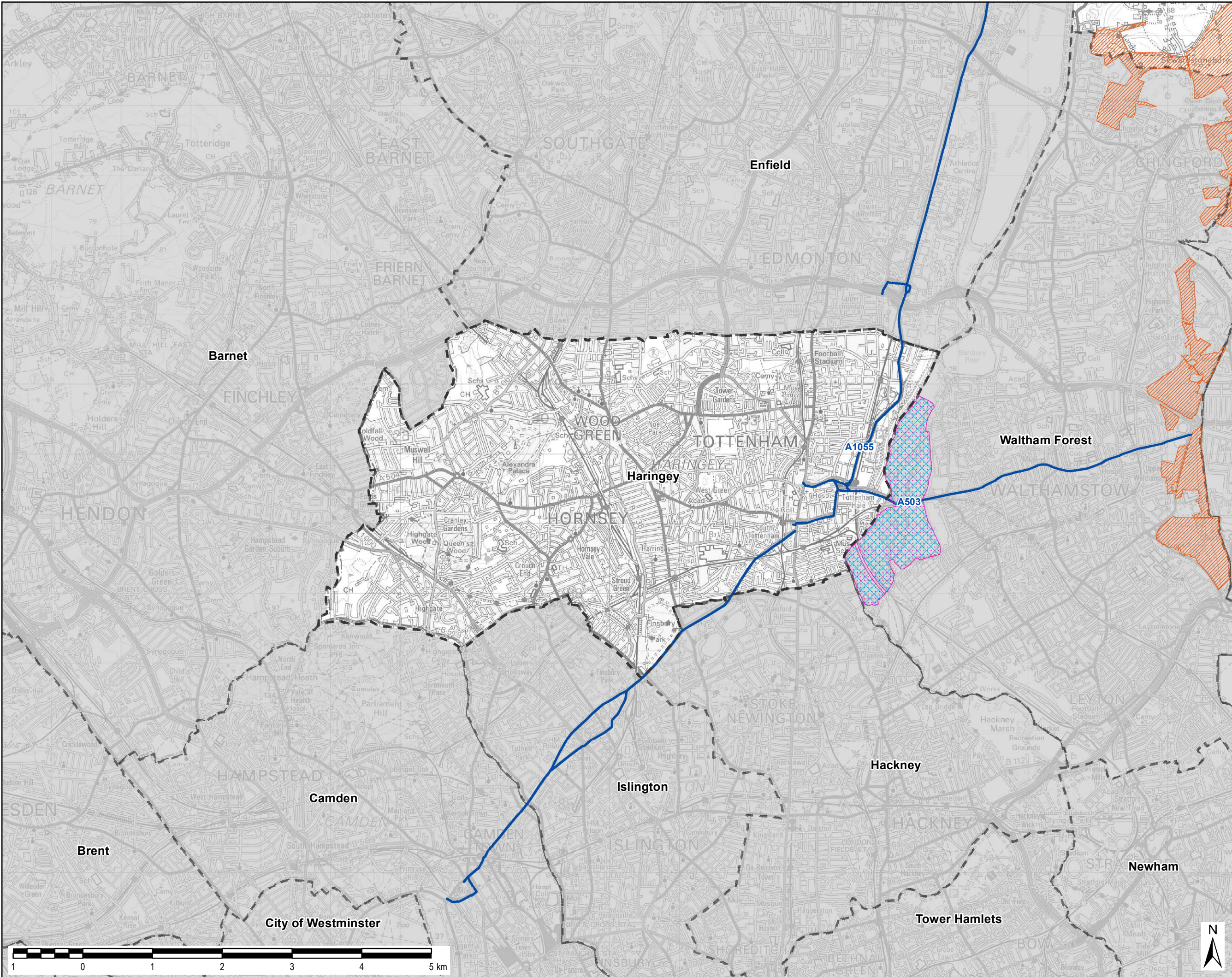
- Disturbance from construction activities
- Collision risk with proposed buildings

5.1.2 Both these impact pathways can be screened out both alone and in-combination with other projects or plans. This is due to the following factors:

- The ability of project specific mitigation measures to be feasibly incorporated at the appropriate level (e.g. not at the Plan level, but rather at the project level) where the competent authority (Council) is satisfied that proposed mitigation could be '*achieved in practice*';
- The urban setting of Lee Valley SPA and Ramsar site and Stoke Newington reservoirs; and,
- The main location of the flyway for bird features of the internationally designated site is along the Lee Valley, rather than across the urban areas of London towards Stoke Newington reservoirs.

Appendix A. Figure 1: Locations of Internationally Designated Sites

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THIS DRAWING IS TO BE USED ONLY FOR THE PURPOSE OF ISSUE THAT IT WAS ISSUED FOR AND IS SUBJECT TO AMENDMENT

LEGEND

- Haringey Borough Boundary
- London Borough Boundary
- Epping Forest Special Area of Conservation
- Lee Valley Ramsar Site
- Lee Valley Special Protection Area
- A Road

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Purpose of Issue
DRAFT

Client
HARINGEY COUNCIL

Project Title
HARINGEY HRA

Drawing Title
**HARINGEY COUNCIL
ENVIRONMENTAL DESIGNATIONS**

Drawn S. Masnikosa	Checked J. Waters	Approved I. Hoffman	Date 10/11/2015
AECOM Internal Project No. 47076094		Scale @ A3 1:50,000	

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Appendix B. Screening Table of Haringey's Draft Development Management Policies (DMPs)

Policies identified in green have been screened from any further assessment due to a lack of realistic impact pathways.

Policies identified in orange have been screened in for further assessment as there is potential for impact pathways to affect internationally designated sites, resulting in likely significant effects.

Table 1: Screening of Haringey's Development Management Policies (DMP)

Policy	Description	Screening outcome
Chapter 2. Design and Character		
DM1	Haringey Development Charter	No HRA implications.
Delivering High Quality Design	A. All development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria: a. Relate positively to neighbouring structures, new or old, to create a harmonious whole; b. Make a positive contribution to a place, improving the character and quality of an area; c. Confidently addresses feedback from local consultation; d. Demonstrate how the quality of the development will be secured when it is built; and e. Are inclusive and incorporate sustainable design and construction principles. Design Standards <u>Character of development</u> B. Development proposals must relate positively to their locality, having regard to: a. Building heights; b. Form, scale & massing prevailing around the site;	This outlines development management policy relating to character, landscaping, and privacy and amenity. There are no impact pathways present.

	c. Urban grain, and the framework of routes and spaces connecting locally and more widely; d. Maintaining a sense of enclosure and where appropriate, following existing building lines; e. Rhythm of any neighbouring or local regular plot and building widths; f. Active, lively frontages to the public realm; and g. Distinctive local architectural styles, detailing and materials. <u>Landscaping</u> C. Development proposals will demonstrate how the landscaping and planting are integrated into the development as a whole. The Council will expect development proposals to respond to: a. Landform; b. Levels, slopes and the fall of the ground; c. Trees on and close to the site; d. Landscaped boundary and treatments; and e. Any other significant biodiversity (including prioritising native over invasive species) on or close to the site. <u>Privacy and amenity</u> D. Developments must ensure a high standard of privacy and amenity for its users and neighbours. The Council will support proposals that: a. Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land; b. Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development; and c. Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to	

	arise from the use and activities of the development.	

DM2 Accessible and Safe Environments	Developments should ensure that they: a. Can be used safely, easily and with dignity by all; b. Are designed so that the layout improves people's access to social and community infrastructure, including local shops and public transport; c. Protect, improve and create, where appropriate, safe and accessible pedestrian and cycling routes and should not impede pedestrian and cycling permeability; and. Comply with the principles set out in 'Secured by design'.	No HRA implications. This outlines development management policy relating to accessibility and safety. There are no impact pathways present.
DM3 Public Realm	Public Art A. Major development proposals should consider how the scheme enhances local distinctiveness and legibility through the use of public art. The public art, which should be maintained in perpetuity, should be located in a prominent location, and could be fixed to the proposed building, or located on the development site in a public space. Privately owned public spaces within new Development A. New privately owned public spaces should increase the sense of public freedom rather than compounding the sense that it is a private space. The management of these spaces, including their use and public access, will need to be agreed by the Council. Advertisements B. Proposals for all advertisements should be designed to a high standard and in particular should: a. Contribute to a safe and attractive environment; b. Be of a high quality and sensitive to its visual appearance on the building on which it is to be sited and the surrounding street scene, especially in the case of listed buildings and conservation areas; c. Avoid unsightly proliferation or clutter of signage in the vicinity; d. Not cause a hazard to pedestrians or road users, including by siting and design Be sited to avoid visual intrusion of light pollution into adjoining residential properties; and f. Where appropriate, be constructed of materials and finishes which discourage both graffiti and fly	No HRA implications. This outlines development management policy relating to public art, advertisements and telecommunications. This policy does not outline any specific development. There are no impact pathways present.

	posting. Telecommunications equipment C. Proposals for the installation of telecommunications equipment will be permitted where: It is demonstrated the equipment is limited to the minimum operational requirement; b. Opportunities for sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored and have been taken advantage of; c. There is no significant adverse impact on the visual amenity of neighbouring occupiers; d. There is no adverse effect on the external appearance of the building, street scene, or spaces in which they are located; e. The size of any equipment visible from the street is minimised (including satellite dishes, other domestic equipment and any supporting structures); f. The equipment is future-proofed to accommodate anticipated improvements in infrastructure; g. They are located discretely and do not detract from the special character and appearance of heritage assets or conservation area; h. They are appropriately designed, coloured and landscaped. For dishes, this may include installing a mesh or transparent structure; i. A minimum residual footway width on main pedestrian roads in line with the Manual for Streets is preserved. D. All telecommunications equipment should be removed as soon as reasonably practicable after it is no longer required.	
DM4 Provision and Design of Waste Management Facilities	A. All proposals should consider how to sustainably manage waste arising from the development during the design, construction and occupation phases of new developments. B. All proposals will be required to make on-site provision for general waste, the separation of recyclable materials and organic material for composting. The on-site provision must:	No HRA implications. This outlines development management policy relating to provision and design of waste management facilities. It does not

	a. Ensure adequate dedicated internal and external storage space to manage the volume of waste arising from the site; Provide accessible and safe access to on-site storage facilities, both for occupiers and collection operatives, including vehicles, having regard to the Council's Refuse Collection Strategy; c. Be located and screened to avoid nuisance and adverse impact on visual and other amenity to occupiers and neighbouring uses, and are within the maximum permitted carrying and reversing distances; and d. For mixed-use development, suitably separate household and commercial waste. C. In addition, proposals for new multi-storey flatted residential development will be required to make provision for: a. Adequate temporary storage space within each flat, allowing for separate storage of recyclable materials; b. Adequate communal storage for waste, including separate storage for recyclables, pending its collection; and c. Storage and collection systems at each floor (such as dedicated rooms, storage areas and chutes or underground waste collection systems) which are sensitively integrated into the development, with the Council giving preference to basement servicing over the use of forecourts or ground floor internal storage.	outline any specific development. There are no impact pathways present.
DM5 Locally Significant Views and Vistas	A. Development proposals within the viewing corridors of the Locally Significant Views shown on Map 2.2 must demonstrate how the proposal: a. Enhances the viewers' ability to recognise and appreciate the landmark being viewed; b. Makes a positive contribution to the composition of the local view; and c. Meets the requirements of the Council's Tall Buildings and Views Supplementary Planning Document. B. Obstructions to the Locally Significant Views should be minimised and will be assessed by the Council on their level impact on the views. C. Development proposals should consider opportunities to create new local views and vistas through the design and layout of new development.	No HRA implications. This outlines development management policy relating to vistas and views. There are no impact pathways present.

	D. Existing identified viewpoints and viewing points should remain accessible and managed.	
DM6 Building Heights	A. For all development (including Tall and Taller buildings) proposals, the Council expects building heights to be of an appropriate scale which responds positively to the site's surroundings, including nearby sites, having regard to the need to achieve a high standard of development and should be consistent with the Council's Tall buildings and Views Supplementary Planning Document. B. Tall buildings will only be acceptable in areas identified on Map 2.2 as being suitable for tall buildings. C. Where tall buildings are acceptable in principle, having regard to A and B above, proposals must be justified in community benefit as well as urban design terms and should conform to the following general design requirements: a. Relates to the adjacent and surrounding buildings in terms of mass, bulk and height in order to respect the character of the townscape and landscape context; b. Responds to the local and historic environment, including the relationship to the local context of the locality, paying particular regard to local heritage assets, conservation areas and historic parks, and their setting; c. Protects and preserves existing locally important and London wide strategic views in accordance with policy DM5; d. Be of the highest standard of architectural quality and design, including a high quality urban realm; e. Represent a landmark building which by its distinctiveness must be: i. A way finder or marker, drawing attention to locations of civic importance, major public transport interchanges, and areas of high visitation; ii. Elegant and well proportioned, and visually interesting when viewed from any distance or direction; and iii. Positively engages with the street environment. f. Considers the impact on ecology and microclimate. D. Tall buildings within close proximity to each other should:	Potential impact pathways present This outlines development management policy relating to tall buildings located within Map 2.2. This outlines provision for mid-high rise buildings within 150m of Lee Valley SPA and Ramsar site. Potential impact pathways present: Disturbances from construction activities

	a. Avoid a canyon effect; b. Consider the cumulative climatic impact of the buildings; and c. Avoid coalescence between individual buildings, d. Each building accords with A and B above, e. Demonstrate how they collectively contribute to the delivery of the vision for the area. E. All proposals for tall buildings must be accompanied by an urban design analysis which assesses the proposal in relation to the surrounding context. This may include the submission of a digital 3D model to assist in the understanding of the design concept and impacts of the development.	
DM7 Development on Infill, Backland and Garden Land Sites	A. There will be a presumption against the loss of garden land unless it represents comprehensive redevelopment. B. Development proposals for infill, backland and garden land should meet the requirements of DM1 and DM2, and must: a. Relate appropriately and sensitively to the surrounding area as well as the established street scene, ensuring good access and where possible, retaining existing through routes; b. Provide a site specific and creative response to the built and natural features of the area; c. Where appropriate, repair or re-provide street frontage and provide additional passive surveillance and increased security; d. Safeguard privacy, amenity, and ensure no loss of security for adjoining houses and rear gardens; e. Retain and provide adequate amenity space for existing and new occupants; f. Incorporate at least one street frontage or be ancillary to the host dwelling and the adjacent houses/terraces; and g. Not result in 'gated' developments that prevent access which would normally be provided by a publicly accessible street.	No HRA implications. This outlines development management policy relating to development on infill, backland and garden land sites. There are no impact pathways present.
DM8 Shopfronts, Signs and On-	Shopfronts A. The Council will require shopfronts, including their signs and security design, to be designed to a high	No HRA implications. This outlines development

street Dining	standard and contribute to a safe and attractive environment. In particular: a. The Council will seek the retention of traditional shopfronts of distinctive character contributing to the visual, architectural or historic quality of the local townscape; b. Replacement shopfronts should conserve original materials as far as possible; c. The alteration or replacement of an existing shopfront or a new shopfront must allow for easy access by all members of the community; d. The Council will not support shopfront canopies fixed in the „down“ position. Retractable shopfront canopies may be acceptable where they are of an appropriate design and maintain sufficient clearance; and e. Solid external security shutters should be avoided. Signage Where required, the Council will grant consent for shopfront signage, including illuminated fascia signs, and free-standing display panels where they contribute to an attractive environment and do not cause a public safety hazard, contribute to clutter or a loss of amenity. On-street dining C. Proposals for on-street/forecourt dining must demonstrate the suitability of the proposed location, and should: a. Be integral and functionally related to the business; b. Be distinct from the pavement space and provide sufficient space to not obstruct it; and c. Be composed solely of moveable furniture.	management policy relating to shopfronts, signs and on-street dining. There are no impact pathways present.
DM9 Management of the Historic Environment	Haringey's Heritage Assets A. Development that sustains and enhances the significance of a heritage asset and its setting will be supported. B. Proposals affecting a designated or non-designated heritage asset and its setting will be assessed	No HRA implications. This outlines development management policy relating to the historic environment. There are no impact pathways

	against: a. The significance of the asset and its setting, and the impact of the proposals on that significance; and b. A statement submitted by the applicant describing the significance of the heritage asset(s) concerned, including any contribution made by its setting, along with an assessment and justification of the impact of the new development on the asset and its setting. C. When considering the impact of proposals on the historic environment, the Council will have regard to: a. The priority given to sustaining and enhancing the significance of a heritage asset and its setting; b. Character appraisals and management plans or other guidance, where they are available; c. The preservation or reinstatement of original or historic form, fabric, function or character of the asset and its setting; d. The desirability of securing a viable use for a heritage asset consistent with its conservation; e. Understanding of and respect for significance of heritage assets as parts of measures to mitigate and adapt to climate change; and The contribution that the sensitive utilisation of heritage assets can make to sustainable regeneration. Conservation Areas D. Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or compliment the special characteristics and significance of the area. E. Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive. Listed and Locally Listed Buildings F. In addition to (A-C) above, the Council will seek opportunities to secure the future of listed buildings	present.

particularly those on the „Heritage at Risk“ register, provided they:

- a. Do not lead to substantial harm or total loss of their significance;
 - b. Retain and repair existing features and fabric, or, if missing, replace them in a sympathetic manner;
 - c. Do not harm the structural integrity or stability of the building or that of adjoining buildings or structures; and
 - d. Extensions are restricted to less significant parts of the building, relate sensitively to the original building and not adversely affect the internal or external appearance or character of the building, curtilage or its setting.
- G. Subject to (A-C) above, the Council will seek to protect the local distinctiveness of the Borough by sustaining and enhancing the significance of locally listed buildings.

Archaeology

H. Proposals affecting a designated Archaeological Priority Area will be considered having regard to:

- a. The significance of an archaeological asset and its setting;
- b. The impact of the proposal on archaeological assets; and
- c. The priority given to preserving and managing the archaeological asset and its setting in situ.

I. All proposals will be required to assess the potential impact on archaeological assets and where appropriate ensure adequate arrangements for the investigation, recording and archiving of assets of archaeological importance and engage with the relevant advisory organisations.

Enabling development

J. The Council will approve proposals for enabling development where it is demonstrated that:

- a. It is the only viable means of securing the long term future of the asset affected; and
- b. It is the optimum viable use, supported by an appropriate options appraisal; and
- c. The proposals address relevant policies A-I above. Proposals that cause harm should be exceptional

	in relation to the significance of the asset, and be clearly and convincingly justified in line with national policy.	
Chapter 3. Housing		
DM10 Housing Supply	A. The Council will support proposals for new housing on sites allocated for residential development, including mixed use residential development, within the Site Allocations Local Plan and Area Action Plans. B. The Council will resist proposals for the development of alternative uses on allocated sites which are considered particularly suitable for general and specialist housing, unless it can be demonstrated that there is an overriding public benefit. C. The Council will resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace. D. Windfall development will be considered acceptable where this complies with all relevant policies of this Plan.	No HRA implications. This outlines housing supply policy. Whilst this policy does imply increases in residential development, there is no specific location or quantity of housing defined. This is defined within Haringey's Strategic Policies (also see Alterations document) There are no impact pathways present.
DM11 Housing mix	A. Proposals for new residential development, including mixed-use schemes comprising residential accommodation, should provide a mix of housing having regard to: a. Individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed; b. The target mix for affordable housing, in accordance with policies SP2 and DM13, and the Council's Housing Strategy; c. The priority afforded to the delivery of affordable family housing; d. The need to optimise housing outputs on sites; and e. The need to achieve mixed and balanced sustainable communities. B. The Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach (see Policies DM1 and DM2), also having regard to the findings of the Haringey Urban Characterisation Study (2015). C. The Council will not support proposals which result in an overconcentration of 1 or 2 bed units unless they are part of larger developments or located within neighbourhoods where such provision would	No HRA implications. This outlines development management policy relating to housing mix. There are no impact pathways present.

	deliver a better mix of unit sizes which include larger and family sized units. D. Proposals for comprehensive renewal of a social housing estate will be required to re-provide the existing affordable housing on an equivalent habitable room basis, tailored to better meet current housing needs and the achievement of more inclusive and mixed communities. E. Institutional investment which provides long-term investment in the private rental sector (not including accommodation for students) will be supported by the Council where it meets local housing needs and is of a high quality and consistent with the policies in this Plan, including the requirement to provide affordable housing.	
DM12 Housing Design and Quality	A. All new housing and residential extensions must be of a high quality, taking account of the privacy and amenity of neighbouring uses (See Policy DM1) and are required to meet or exceed the minimum internal and external space standards of the London Plan and the Mayor's Housing SPG. B. Ground floor family housing should provide access to private garden/amenity space, and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity, privacy and design considerations, or to shared amenity space and children's play space. C. In areas of especially poor residential environmental quality, the Council will seek the development proposal to include enhanced provision of green infrastructure, including the quantity and quality of landscaped areas, tree provision and, where the site allows, the provision of additional open space. D. Mixed tenure residential development proposals must be designed to be „tenure blind“ to ensure homes across tenures are indistinguishable from one another in terms of quality of design, space standards and building materials. Residential Extensions E. Extensions or alterations to residential buildings, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, and porches. High quality matching or complementary materials should be used appropriately and sensitively in relation to the context. F. New rooms created by an extension should comply with space and amenity requirements set out in the London Plan and the Mayor's Housing Supplementary Planning Guidance.	No HRA implications. This outlines development management policy relating to housing design and quality. There are no impact pathways present.
DM13 Affordable Housing	A. The Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate	No HRA implications. This outlines development

	11 or more dwellings, having regard to: a. Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision; b. The need for 60% provision to be social/affordable rent and 40% intermediate housing; c. The preferred affordable housing size mix as set out in the Council's Housing Strategy; d. The individual circumstances of the site; e. The availability of public subsidy; f. Development viability; and g. Other planning benefits that may be achieved. B. The affordable housing requirement will apply to: a. Sites that are artificially sub-divided or developed in phases; b. Additional residential units that are created through amended planning applications; c. Additional residential units proposed above that granted by permitted development; d. Unsecured student accommodation (see Policy DM15); e. All forms of Use Class C3 housing, and f. The total (gross) residential units to be delivered on the site. C. The Council may seek to alter the tenure and/or mix of affordable provision to be secured on a case-by-case basis to avoid affordable housing of a certain tenure or size being over or under represented in an area, or to assist in improving development viability (e.g. through provision of a greater ratio of intermediate housing). D. In negotiating the level of affordable housing provision viability assessments must be based on a standard residual valuation approach with the benchmark existing use land value as set out in Para 17 of the National Planning Policy Guidance.	management policy relating to the provision of affordable housing. It does not provide for increases in housing numbers. There are no impact pathways present.

	E. To maximise affordable housing output on schemes with a long build out period and/or at times of economic uncertainty, the Council will require the use of „cascade agreements“ and „contingent obligations“ as defined by the London Plan and set out in the Planning Obligations SPD. F. On-site provision of affordable housing will be required. Only in the following exceptional circumstances may an off-site provision be acceptable, where a development can: a. Secure a higher level of affordable housing on an alternative site. b. Secure a more balanced community. c. Better addresses priority housing needs. G. The Council will seek to achieve 20% of new units on small sites to be achieved as affordable, in line with SP2 and set out in the Planning Obligations SPD. H. Cash in-lieu contributions are only acceptable as a last resort and are also subject to the exceptional circumstances listed above.	
DM14 Self-build and Custom build housing	A. Planning applications for „self or custom build“ housing, built or commissioned by individuals or groups of individuals for their own occupation, will be supported by the Council. B. The Council will seek to identify plots for self and custom build housing across a range of tenures where the demand is identified. C. Self or Custom build housing is by definition C3 housing and is subject to the requirements of Haringey's Local Plan, including affordable housing (see Policy DM13), housing design and quality (see Policies DM1, DM2 and DM16), and planning obligations (see Policy DM48).	No HRA implications. This outlines development management policy relating to self-build and custom build housing. It does not outline increase in housing numbers or define location for housing. There are no impact pathways present.
DM15 Specialist Housing	Special Needs Housing A. Applications for development that would result in the loss of special needs housing will only be granted permission where it can be demonstrated that there is no longer an established local need for this type of accommodation or adequate replacement accommodation will be provided. B. The Council will support proposals for new special needs housing where it can be shown that: a. there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy;	No HRA implications. This outlines development management policy relating to the provision of specialist housing. It does not outline increase in housing numbers or define location for housing. There are no impact pathways present.

	b. the standard of housing and facilities are suitable for the intended occupiers in terms of: i. the provision of appropriate amenity space, parking and servicing; ii. the level of independence; and iii. necessary level of supervision, management and care/support; c. there is a good level of accessibility to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and d. the impact of the proposed development would not be detrimental to the amenity of the local area or to local services. Student Accommodation C. Where further student accommodation is required to meet local and strategic need, it will be supported where it is appropriately located within: a. One of Haringey's Growth Areas, as identified in the Strategic Policies Local Plan; or b. Within or at the edge of a town centre; and c. In an area of good public transport accessibility. D. In addition to meeting the requirements (C) above, proposals for student accommodation will also need to show that: a. there would be no loss of existing housing; b. there would be no adverse impact on local amenity, in particular, the amenity of neighbouring properties and on-street parking provision; c. the accommodation is of a high standard, including adequate unit size and compliance with daylight and sunlight standards; d. provision is made for units that meet the needs of students with disabilities;	

	e. the need for the additional bedspaces can be demonstrated; and f. the accommodation can be secured by agreement for occupation by members of a specified educational institution(s), or the proposal deliver an element of affordable student accommodation. Residential Hostels and Secured Accommodation E. The Council will support the provision of new hostels and secured accommodation where: a. the proposal does not involve the loss of permanent housing or existing satisfactory shared accommodation; b. the proposal will not result in an overconcentration of provision in an area; c. the proposal is located close to public transport, shops and services; d. the scale and intensity of hostel use or secured accommodation is appropriate to the size of the building; e. there would be no adverse impact on the amenity of neighbouring properties or the character of the area; and f. the standard of accommodation and facilities, including safety and security, is suitable for the intended occupiers. F. Proposals involving the loss of an existing hostel will need to demonstrate that: a. The accommodation is no longer needed or there is alternative provision available in the immediate area; or b. The existing accommodation is not fit for purpose for its continued current use and re-provision is unviable	
DM16 Residential Conversions	A. To maintain a supply of larger family homes to meet Haringey's housing need, the Council will only permit the conversion of a larger home(s) to small self contained homes (Class C3) where: a. It is located outside of the Family Housing Protection Zone as shown on Map 3.1; b. The gross original internal floor space of the existing dwelling is greater than 120m²;	No HRA implications. This outlines development management policy relating to residential conversions. It does not outline increase in housing numbers or define location for

	c. The proposal satisfies all other relevant policies, including the minimum internal space standards, the provision of satisfactory levels of amenity space, privacy, daylight, parking and access, and adequate and convenient refuse storage and collection; d. The resulting units achieve internal configurations that are practical and fit for purpose, including vertical and horizontal stacking arrangements that minimise noise transfer between homes, including neighbouring homes; e. The design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retains a single door to the front elevation of dwellings in residential areas; f. The balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard-surfaced) does not detract from the appearance of the property or the street scene; and g. The proposal provides for a mix of unit sizes (i.e. proposals which seek to maximise the number of one bedroom or studio units will not be acceptable where an alternative mix including larger units could be practically provided). B. Conversions within the Family Housing Protection Zone will only be considered acceptable where they comply with criteria b – g above, and result in a net gain in the number of family sized units. C. Where existing garden land is available the Council will seek to optimise the total amount of private amenity space and access to this space for residents. D. Conversions outside of the Family Housing Protection Zone should be supported by a car parking survey which demonstrates that there is residual car parking supply to meet the demand created by the proposal.	housing. There are no impact pathways present.
DM17 Houses in Multiple Occupation	A. Proposals for the conversion of larger homes to Houses in Multiple Occupation (HMO), including small HMOs (3-6 unrelated people) within the area covered by the Article 4 Direction (as shown in Map 3.2), will only be permitted where: a. The gross original internal floor space of the existing dwelling is greater than 120m²; b. They do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood, including cumulative impacts arising from an over-concentration of HMOs within an area; c. Satisfy the appropriate Haringey Environmental Health Standards;	No HRA implications. This policy does provide for increases in population via increases in the number of people inhabiting a single dwelling. However, this policy does not define a quantity or location of the increase in HMOs. In addition, it is assumed that the increase in HMOs will be in line with the number of new dwellings outlined

	d. Are accessible by public transport, cycling and walking; e. Provide high quality accommodation that satisfies the relevant policies of the Local Plan, including internal space standards, provision of a satisfactory level of amenity space for occupants, and adequate and convenient refuse storage and collection; f. Where non self-contained, have exclusive use of a kitchen or space within a shared kitchen for each household. B. Planning applications for the change of use from an HMO to self contained accommodation will only be considered in the following circumstances: a. Where the property does not meet the appropriate standards and has no realistic prospect of meeting the standards; or b. Where the property is in a Growth Area or Area of Change and is not registered.	within Haringey's Local Plan. As such it can be considered that there are no impact pathways present. There are no impact pathways present.
DM18 Residential Basement Development and Light Wells	A. Householder extensions to existing basements or the construction of new basements in existing dwelling will only be permitted where it can be demonstrated that the proposal: a. Will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure, including the adjoining highway, having regard to local geological conditions; b. Does not increase flood risk to the property and nearby properties from any source; c. Avoids harm to the appearance or setting of the property or the established character of the surrounding area; d. Will not adversely impact the amenity of adjoining properties by reason of noise or increased levels of internal or external activity; e. Will not adversely impact the local natural and historic environment; And, where the proposed basement extends beneath the garden area: f. Will not cause loss, damage or long-term threat to trees of townscape or amenity value; g. Maintains adequate soil depth satisfactory for preservation of landscaping consistent with neighbouring properties;	No HRA implications. This outlines development management policy relating to residential basement development and light wells. It does not outline increase in housing numbers or define location for housing. There are no impact pathways present.

	And during the construction phase: h. Will not harm unacceptable pedestrian, cycle, vehicular and road safety, adversely affect bus or other transport operations, significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working or visiting nearby; and i. Will minimise construction impacts such as noise, vibration and dust for the duration of the works. B. The Council will not permit basements which include habitable rooms or other sensitive uses in areas prone to flooding and where there is no satisfactory means of escape. C. In determining applications for light wells, the Council will consider whether: a. The architectural character of the building is protected; b. The character and appearance of the surrounding area is harmed; and c. The development results in the loss of more than 50% of the front garden or amenity area.	
Chapter 4. Environmental Sustainability		
DM19 Nature Conservation	A. Development proposals on sites which are, or are adjacent to, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance the nature conservation value of the site. B. Development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused.	No HRA implications. The outlines policy for the protection of nature conservation sites (SSSI, LNR and SINCs) and 'important ecological assets'. Whilst it is noted that there are no internationally designated conservation sites within the Borough, Lee Valley SPA is located immediately adjacent to the Borough. For robustness, this policy should also include reference to internationally designated sites. There are no impact pathways present.
DM20 Open Space and Green	A. Open Space is protected from inappropriate development by Strategic Policy SP 13. The Council will not grant planning permission for proposals for development that would result in the loss of open space, unless an assessment has been undertaken which shows that the open space is surplus to requirement	No HRA implications. This outlines policy relating to

Grid	for use as an open space. B. The reconfiguration of open space will be supported where: a. It is part of a comprehensive, deliverable scheme; b. There would be no net loss of open space; c. It would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space; and d. It would not be detrimental to any environmental function performed by the existing open space. C. The Council will require all development providing new or replacement open space, wherever possible, to connect to the All London Green Grid. Protection and enhancement of this network will make a positive contribution to Haringey and its communities, in addition to providing social, recreational and ecological benefits. D. Proposals for ancillary development on open space will be supported where: a. It is necessary to or would facilitate the proper functioning of the open space; b. It would not be detrimental to any other functions of the open space; c. It is ancillary to the use (s) of the open space; d. It would be of appropriate scale; e. It would not detract from the open character of the site or surroundings; f. It would contribute positively to the setting and quality of the open space. E. The Council supports the provision and improvement of outdoor leisure facilities. Ancillary developments which enhance the park and open space offer, such as refreshment facilities, market and event spaces, public conveniences, public art installations or outdoor play and fitness equipment, or to meet the special needs of education, will be permitted, provided that they: a. Are of a high standard of design and quality, safe and accessible to all;	open space and green grid. This is a positive policy in that it refers to policy SP13 of the Local Plan which offers protection of Open Space from 'inappropriate development' that would result in a loss of an open space except under certain criteria. The presence of open space encourages people from using sensitive wildlife sites, such as an SPA/ Ramsar site for recreation and diverts recreational activity to these amenity areas. There are no impact pathways present.

	b. Are not detrimental impact on nature conservation and biodiversity; c. Do not adversely detract from the overall function, amenity, character and appearance of the park or open space. F. Development adjacent to open space should seek to protect and enhance the value and visual character of the open land. G. Sites over 1Ha in size which are located in identified areas of open space deficiency should seek to create new publically accessible open space on the site, subject to viability. H. Consideration will be given to designating Local Green Spaces in line with national planning guidance.	
DM21 Sustainable Design, Layout and Construction	A. All new development, including building and landscape works, will be expected to consider and implement sustainable design, layout and construction techniques. Proposals should: a. Apply the energy hierarchy to minimise energy use in order to meet, and if possible exceed, minimum carbon dioxide reduction requirements; b. Apply the cooling hierarchy to reduce the potential for overheating and limit reliance on mechanical air conditioning systems; c. Maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls; and d. Wherever possible, use building materials with high environmental performance ratings; and e. Seek opportunities for locally sourced labour. B. The Council will support appropriate measures to sustainably retrofit existing homes and non-residential buildings. C. Proposals that fail to demonstrate adequate consideration for sustainable design, layout and construction techniques will be resisted. D. Consideration will be given to the use of carbon offset payments, to be secured by S106 agreements, where it can be demonstrated that proposals are unable to meet carbon dioxide emission reduction targets on-site.	No HRA implications. This outlines development management policy relating to sustainable design, layout and construction. By nature of the term, sustainable activities will not result in likely significant effects. There are no impact pathways present.
DM22	A. Subject to other policy requirements, proposals that contribute to the provision and use of	No HRA implications.

Decentralised Energy	Decentralised Energy network infrastructure will be supported. B. Communal energy systems a. All major development should incorporate site-wide communal energy systems that serve all energy demands within the development from a common system, irrespective of whether it is connected to a DE network. b. All development that incorporates site-wide communal energy systems should optimise opportunities for extending such systems beyond the site boundary to supply energy to neighbouring existing and planned future developments. C. Existing and planned future DE networks a. All development proposals should prioritise connection to existing or planned future DE networks. b. All major development located within 500 metres of an existing DE network, and minor new-build development located within 25 metres, will be expected to secure connection to that network. c. All major development located within 500 metres of a planned future DE network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be expected to secure connection to that network. d. Where connection to an existing or planned future DE network is expected, applicants must submit a feasibility assessment so the Council can determine whether a connection is technically feasible and financially viable. D. DE network „connection zones“ a. All major development located within 500 metres of a DE network „connection zone“ should be designed for connection to a DE network. b. All minor new-build development located within 25 metres of a DE network 'connection zone' should be designed for connection to a DE network. E. Customer charters a. Where site-wide communal and district heating systems are operational, the Council will strongly encourage heat and energy service providers to enter into Customer Charters with domestic and micro-business customers.	This outlines development management policy relating to decentralising energy. This policy does not identify any location or type of energy development. It is noted that if development delivered within the policy provides for wind turbines, pylons, or other tall structures in proximity to Lee Valley SPA and Ramsar, consideration for the features of the internationally designated site will be required. There are no impact pathways present.

DM23 Environmental Protection	Air Quality A. All development should be designed to: a. Improve or mitigate its impact on air quality in the Borough; and b. Improve or mitigate its impact on air quality for the occupant of the building or users of the development. B. Air quality assessments will be required for all major development and other development proposals, where appropriate. C. Where adequate mitigation is not provided planning permission will be refused. Noise and Vibration D. The Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Potentially noisy developments may be refused if it cannot be suitably demonstrated that measures will be implemented to mitigate its impact. E. A noise assessment will be required to be submitted if the proposed development is a noise sensitive development, or an activity with the potential to generate noise. Light Pollution F. Development proposals that include external lighting must mitigate potential adverse impacts from such lighting. Where relevant, proposals will be required to submit details demonstrating that external lighting is: a. Appropriate for its purpose in its setting; b. Designed to minimise and provide protection from glare and light spillage, particularly to sensitive receptors such as residential properties and natural habitats, including watercourses; and c. Energy efficient. Contaminated Land G. Proposals for new development will only be permitted where it is demonstrated that any risks	No HRA implications. This outlines development management policy relating to environmental protection, including air quality, noise and vibration, light pollution, contaminated land, and hazardous substances. This is a positive policy in that encourages improvements in air quality and ensures sensitive locations are protected. There are no impact pathways present.

	associated with land contamination, including to human health and the environment, can be adequately addressed in order to make the development safe. H. All proposals for new development on land which is known to be contaminated, or potentially contaminated, will be required to submit a preliminary assessment to identify the level and risk of contamination and, where appropriate, a risk management and remediation strategy. Hazardous Substances I. Proposals for development of new hazardous installations, or development of sites located within the vicinity of existing installations, will only be permitted where it is demonstrated that necessary safeguards are incorporated to ensure the development is safe.	
DM24 Managing and Reducing Flood Risk	A. The Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding. B. All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied. Proposals must be informed by a site specific Flood Risk Assessment taking account of all potential sources of flooding and should: a. Demonstrate the application of a sequential approach for the development of individual sites to ensure that the most vulnerable land uses are located in areas of the site that are at lowest risk of flooding; b. Preserve overland flood and flow routes and ensure there is no net loss of flood storage. Adequate flood storage and compensation should be provided on site, or if this is not possible, provided off site where circumstances allow; c. Where appropriate, set out the mitigation measures that will be incorporated on site to manage residual flood risk including: i. Finished floor levels set no lower than 300mm above the 1 in 100 chance in any given year, including an allowance for climate change, flood level; and ii. Ensure safe access and egress for future users of the development or an appropriate emergency evacuation plan. d. Contribute to naturalising watercourses where opportunities arise, in line with Policy DM28 (Watercourses and Flood Defences).	No HRA implications. This outlines development management policy relating to managing and reducing flood risks. This is a positive policy. There are no impact pathways present.

	C. All proposals for new development will be required to: a. Manage and reduce surface water run-off, in line with Policy DM25 (Sustainable Drainage Systems) and Policy DM26 (Critical Drainage Areas); b. Manage water and waste water discharges, in line with Policy DM29 (On-site Management of Waste Water and Water Supply). D. With the exception of water compatible uses and essential infrastructure, development in areas designated in Haringey's Strategic Flood Risk Assessment as being within Flood Zone 3b will not be permitted.	
DM25 Sustainable Drainage Systems	A. All proposals for new development must seek to manage surface water as close to its source as possible in line with the London Plan drainage hierarchy. B. The Council will require Sustainable Drainage Systems (SuDS) to be sensitively incorporated into new development by way of site layout and design, having regard to the following requirements: a. All major development proposals will be required to reduce surface water flows to a greenfield run-off rate for a 1 in 100 year critical storm event; b. All minor development proposals should aim to achieve a greenfield rate of run-off and, at a minimum, achieve a 50 per cent reduction on existing site run-off rates; and c. All other development should seek to achieve a greenfield rate of run-off and include at least one „at source“ SuDS measure resulting in a net improvement in water quantity or quality discharging to a sewer; and d. For all development where a greenfield run-off rate cannot be achieved justification must be provided to demonstrate that the rate has been reduced as much as possible. C. Where Sustainable Drainage Systems are implemented they will be expected to: a. Meet the requirements set out in the Council's relevant standards and guidance, or national standards where agreed; b. Incorporate measures identified in the Surface Water Management Plan; c. Be designed to maximise biodiversity and local amenity benefits, and where appropriate, ensure that SuDS techniques provide for clean and safe water at the surface;	No HRA implications. This outlines development management policy relating to sustainable drainage systems. This is a positive policy. There are no impact pathways present.

	d. Improve water quality; and e. Function effectively over the lifespan of the development. D. Where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations) robust justification must be provided along with proposed alternative sustainable approaches to surface water management.	
DM26 Critical Drainage Areas	A. All proposals for new development within a Critical Drainage Area (CDA) will be required to incorporate measures to reduce the overall level of flood risk in the CDA. B. Proposals for new development within Local Flood Risk Zones must include a statement describing how flood risk issues have been addressed. The Council may require a further site-specific Flood Risk Assessment to assess risk, particularly from surface water flooding.	No HRA implications. This outlines development management policy relating to critical drainage areas and local flood risk zones. This is a positive policy. There are no impact pathways present.
DM27 Protecting and Improving Groundwater Quality and Quantity	A. The Council will seek to protect and improve the quality and quantity of groundwater resources within the Borough. B. All proposals for new development will be required to identify existing and potential new sources of groundwater pollution and where appropriate, submit a relevant desktop study to demonstrate this has been fully considered, including on sites with an historic legacy of contamination. C. All proposals for new development must ensure that: a. There is no adverse impact on groundwater quality, either by design, construction or operation of the development; and b. Appropriate construction techniques are used in order to limit disturbance to natural groundwater flows. D. The Council will refuse proposals for new development in Source Protection Zones where there would be an unacceptable risk to groundwater quality.	No HRA implications. This outlines development management policy relating to protecting and improving groundwater quality and quantity. This is a positive policy. There are no impact pathways present.
DM28 Watercourses and Flood Defences	A. New development must be set back at a distance of 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as agreed by the Council and the Environment Agency, in order to provide an adequate undeveloped buffer zone. B. Development proposals on sites containing a main river or ordinary watercourse will be required to demonstrate how the objectives of the Thames River Basin Management Plan and London River	No HRA implications. This outlines development management policy relating to watercourses and flood defences. This is a positive policy as it

	Restoration Action Plan have been taken into account. C. Having regard to (B) above all major development will be required to, and minor development should: a. Investigate and secure the implementation of environmental enhancements to open sections of the river or watercourse; and b. Investigate and secure the implementation of measures to restore culverted sections of the river or watercourse. D. The Council will resist proposals that would adversely affect the natural functioning of main rivers and ordinary watercourses, including through culverting. E. Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements. F. Development on or adjacent to a watercourse must not result in the deterioration of the quality of that watercourse.	ensures that no development on or adjacent to a watercourse will result in deterioration of the quality of that watercourse. There are no impact pathways present.
DM29 On-Site Management of Waste Water and Water Supply	A. The Council will seek to ensure that there is adequate surface water, foul drainage and sewerage treatment capacity to serve all existing and new development. All proposals for new development will be required to: a. Demonstrate that the local public sewer network has adequate capacity to serve the existing and proposed development, or where such capacity does not exist, provide for suitable alternative arrangements for discharging water; b. Ensure the separation of surface and foul water systems, including by investigating and rectifying any identified misconnections; and c. Implement sustainable drainage systems, in line with policy DM25. B. The Council will give preference to mains foul drainage and will seek to restrict the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones, in line with Environment Agency guidance. Where non-mains drainage is proposed for the disposal of foul water, a foul drainage assessment will be required to ensure the most sustainable drainage option will be implemented. C. All proposals for new development will be required to: a. Demonstrate that there is adequate water supply infrastructure capacity both on and off site to serve	No HRA implications. This outlines development management policy relating to waste water and water supply on site management. This is a positive policy. There are no impact pathways present.

	the development without adversely impacting on existing users; and b. Make provision for the installation and management of measures for the efficient use of mains water. D. All proposals for new residential development should be designed to meet the London Plan target for mains water consumption.	
DM30 New Waste Facilities	A. Development proposals for all new waste facilities (including transfer and treatment facilities) will be required to demonstrate that any impacts caused by the operation of the facility can be controlled to achieve levels that will not have a significant adverse effect on human health and the environment.	No HRA implications. This outlines development management policy relating to new waste facilities. This is a positive policy. There are no impact pathways present.
Chapter 5. Transport & Parking		
DM31 Sustainable Transport	A. The Council will require that developments with high trip generating characteristics locate where public transport accessibility is high and car parking is minimised to mitigate generated car travel. B. The Council will support the protection, improvement and creation of pedestrian and cycle routes in the Borough to encourage walking and cycling both as a means of transport and as a recreational activity. The Council will also encourage improved links between pedestrian and cycle routes and public transport facilities, particularly at transport hubs. C. The Council will require the submission of a Travel Plan and a Transport Assessment/Statement in support of development proposals in accordance with the Transport for London thresholds¹³	No HRA implications. This outlines development management policy relating to sustainable transport. This is a positive policy. There are no impact pathways present.
DM32 Parking	A. Development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan. B. The Council will strongly encourage contributions to car club schemes or the provision of car club bays as an alternative to on-site car parking C. The Council will support proposals for new development with limited or no on-site parking where: a. There are alternative and accessible means of transport available; b. Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index;	No HRA implications. This outlines development management policy relating to parking. There are no impact pathways present.

	c. A controlled parking zone exists or will be provided prior to the occupation of the development; d. Parking is provided for disabled people; and e. Parking is designated for occupiers of developments specified as car capped	
DM33 Crossovers, Vehicular Access	A. The Council will only support a proposal for a crossover or new vehicular access where it is demonstrated that the proposal does not result in: a. A reduction in pedestrian or highway safety; b. A reduction of on-street parking capacity within a Controlled Parking Zone; or c. A visual intrusion to the street scene. B. New access roads to new development will only be permitted where they: a. Serve a large number of residential dwellings (generally greater than 200 units); b. Form a link to the highway network; and c. Form a useful extension to an existing highway.	No HRA implications. This outlines development management policy relating to crossovers and vehicular access. There are no impact pathways present.
DM34 Driveways and Front Gardens	The Council will only permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained. Any hard standing should seek to improve drainage and reduce flooding through the use of a permeable paving material.	No HRA implications. This outlines development management policy relating to driveways and front gardens and retaining the permeability of surfaces to prevent increases in flooding. There are no impact pathways present.
DM35 Cycle Storage in Front gardens	A. Cycle storage on front gardens should be of high quality design, should not be visually intrusive and should not harm the amenity of surrounding properties. Planning applications for cycle storage should have regard to the following: a. The size of the shed or storage shelter, the building and the garden;	No HRA implications. This outlines development management policy relating to cycle storage in front gardens. There are no impact pathways

	b. Its location; c. Level of screening; and d. The nature of the materials used	present.
DM36 Mini Cab Offices	A. Proposals for mini-cab offices should only be located within secondary frontages of town centres, in designated local shopping centres or adjacent to transport interchanges. B. In considering applications for mini-cab offices (and driving school offices) the Council will have regard to whether the proposal would have an adverse effect on traffic conditions in the area in particular the safe and efficient operation of buses. C. Where proposals are considered acceptable in principle: a. The Council will impose conditions relating to hours of operation, and noise; b. Permission will normally be granted in the first instance for a limited period of 1 year, in order to assess and review the impact of the use, and made personal to the applicant.	No HRA implications. This outlines development management policy relating to mini cab offices. There are no impact pathways present.
Chapter 6. Employment & Town Centres		
DM37 Maximising the Use of Employment Land and Floorspace	A. Within designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Area – Employment Land, as identified on Haringey's Policies Map, proposals for the intensification, renewal and modernisation of employment land and floorspace will be supported where the development: a. Is consistent with the range of acceptable uses in Policy SP8; b. Wherever possible, is designed to allow for future flexibility of use including subdivision and/or amalgamation to provide for a range of business types and sizes, including small businesses; c. Makes adequate provision of space for on-site servicing and waiting goods vehicles; d. Improves and enhances the quality of the environment of the site and business area; and e. Makes a demonstrable improvement in the use of the site for employment purposes, having regard to: i. The quality and type of employment floorspace provided; ii. The quality and density of jobs to be accommodated on-site; and	No HRA implications. This outlines development management policy relating to maximising the use of employment land and floorspace. This policy does not define any location or type of employment use. There are no impact pathways present.

	iii. The proposal's contribution to the achievement of economic objectives and outcomes set out in the Local Plan and the Council's other key plans and strategies.	
DM38 Employment-Led Regeneration	A. The Council will support proposals for mixed-use development within a Local Employment Area – Regeneration Area or on a highly accessible non-designated employment site where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. In addition to complying with other policy requirements, proposals must: a. Suitably demonstrate that for reasons of viability a mixed-use scheme is necessary to facilitate the delivery of employment floorspace; b. Maximise the amount of employment floorspace to be provided within the mixed-use scheme, having regard to a viability appraisal; c. Provide demonstrable improvements in the site's suitability for continued employment and business use, having regard to: i. The quality, type and number of jobs provided, including an increase in employment densities where appropriate; ii. Flexibility of design to enable adaptability to different business uses over the lifetime of the development; iii. Environmental quality of the site; and iv. Provision for an element of affordable workspace where viable. d. Investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs; e. Ensure an adequate separation of uses, particularly where new residential floorspace is introduced as part of a mixed use scheme; f. Not conflict with or inhibit the continued employment function of the site and nearby employment sites; and g. Enable connection to ultra-fast broadband.	No HRA implications. This outlines development management policy relating to employment-led regeneration. This policy does not define and location or extent of regeneration. There are no impact pathways present.
DM39 Warehouse Living	A. The Council has made provision for proposals for warehouse living within the Harringay Warehouse District as defined in the Site Allocations Document, and the Fountayne & Markfield Roads area as defined in the Tottenham Area Action Plan.	No HRA implications. This outlines development management policy relating to

	B. The Council will support proposals for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element. C. The preparation of a masterplan will have regard to the following matters: a. The access arrangements, physical condition and layout of the existing buildings and accommodation on the site; b. The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community; c. The host community's existing and future accommodation needs for creative living and working; d. The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b); e. The size and type of both the workplace space and residential accommodation to be provided, having regard to: i. the needs of SMEs for smaller unit sizes (<100m²); ii. provision for communal work space, both internal and external; iii. the need for low-cost workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors. f. The interface with, and potential impact on, neighbouring uses; g. The internal layout of uses and therein, the potential to optimise the positive inter-relationships and avoid, where practicable, negative impacts; h. Having regard to (e – g) above, the building specifications and amenity standards to be achieved for both the workshop space and the residential accommodation; i. The specific site requirements as identified in the individual site allocations; j. Controls over the management and operation of the warehouse living spaces, in particular, the means by which to ensure that the use of the site continues to promote the genuine inter-relationship of the	warehouse living. There are no impact pathways present.

	living and working elements; k. Servicing and parking requirements; and Document, and the Fountayne & Markfield Roads area as defined in the Tottenham Area Action Plan. B. The Council will support proposals for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element. C. The preparation of a masterplan will have regard to the following matters: a. The access arrangements, physical condition and layout of the existing buildings and accommodation on the site; b. The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community; c. The host community's existing and future accommodation needs for creative living and working; d. The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b); e. The size and type of both the workplace space and residential accommodation to be provided, having regard to: i. the needs of SMEs for smaller unit sizes (<100m²); ii. provision for communal work space, both internal and external; iii. the need for low-cost workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors. f. The interface with, and potential impact on, neighbouring uses; g. The internal layout of uses and therein, the potential to optimise the positive inter-relationships and avoid, where practicable, negative impacts; h. Having regard to (e – g) above, the building specifications and amenity standards to be achieved for	

	both the workshop space and the residential accommodation; i. The specific site requirements as identified in the individual site allocations; j. Controls over the management and operation of the warehouse living spaces, in particular, the means by which to ensure that the use of the site continues to promote the genuine inter-relationship of the living and working elements; k. Servicing and parking requirements; and l. Viability, including requirements for cross-subsidy from other uses including private residential development (market sale/PRS etc). D. Applications for non „warehouse living“ proposals within the industrial estates identified in Part A of the policy will be assessed against the requirements of Policies DM38, DM40 and Site Allocations as appropriate. E. Proposals for warehouse living on industrial estates not identified in Part A of the Policy will be resisted as will proposals for Live/Work anywhere within the Borough.	
DM40 Loss of Employment Land and Floorspace	A. Subject to other policy requirements, the loss of designated and non-designated employment land and floorspace to a non-employment use will only be permitted where: a. It is demonstrated that the site is no longer suitable or viable for the existing or an alternative industrial or business use; and b. There is clear evidence that an open and recent campaign to market the site, covering a minimum continuous period of 3 years, has been undertaken without success. B. Where the Council is satisfied that the loss of employment land or floorspace is acceptable, it will require new development proposals to: a. Provide the maximum amount of replacement employment floorspace possible, as determined having regard to viability; and b. Apply a sequential approach to delivering an alternative use through redevelopment as follows: i. Strategic community infrastructure appropriate to the location;	No HRA implications. This outlines development management policy relating to loss of employment land and floorspace. There are no impact pathways present.

	ii. Mixed-use development that includes employment generating and/or community uses; and iii. A higher value use, as determined by a viability study. C. Proposals involving the loss of employment floorspace will be required to make a financial contribution towards employment regeneration projects, training schemes, job brokerage services or business support initiatives in line with Policy SP9.	
DM41 New Town Centre Development	A. Proposals for new retail, leisure and cultural uses within Metropolitan Town and District centres will be supported where they: a. Are consistent with the size, role and function of the centre and its catchment; b. Sustain and enhance the vitality and viability of the town centre network; and c. Contribute to the delivery of Haringey's spatial strategy. B. Proposals for new retail, leisure and cultural uses at edge-of-centre locations will be permitted where: a. It is demonstrated through the sequential approach to site selection that there are no appropriate town centre sites available and the proposed location is the most preferable in light of alternatives considered; and b. The proposal complies with (A) above. C. Proposals for new retail, leisure and cultural uses in out-of-centre locations will only be permitted where: a. It is demonstrated through the sequential approach to site selection that there are no appropriate town centre or edge-of-centre sites available; b. Having regard to (a) above, consideration has been given to reasonable alternatives in terms of the format and scale of development in order to accommodate the use in town or edge-of-centre sites; and c. The proposal has been subject to an impact assessment, where required by national policy, and will not demonstrably harm centres within its catchment.	No HRA implications. This outlines development management policy relating to new town development. It does not detail any locations for development. There are no impact pathways present.
DM42 Primary and Secondary	A. Within Primary Shopping Frontages of the Metropolitan and District Town Centres, as defined on the Haringey Policies Map, the use of ground floor units for retail, financial & professional services,	No HRA implications. This outlines development

Frontages	restaurants & cafes and pubs & bars will be permitted where: a. The overall number of units in non-retail use (including extant planning permissions) will not exceed 35% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre; b. The continuity of the center's retail frontage will be maintained, normally with no more than two adjoining units in non-retail use; and c. An active frontage is provided. B. Within Secondary Shopping Frontages of the Metropolitan and District Town Centres, as defined on the Haringey Policies Map, the use of ground floor units for appropriate town centre uses will be permitted where: a. The overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre; and b. An active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage. C. Within Secondary Shopping Frontages, the Council will give consideration to proposals for community facilities where it can be demonstrated that the use will: a. Enhance the vitality and viability of the centre by attracting visitors to it, including by encouraging linked trips for shops and services; b. Ensure access to visiting members of the public; and c. Not result in an overconcentration of similar community uses where this would detract from the diversity of uses in the centre. d. Having regard to the above criteria, proposals for community uses which meet identified local need will be viewed favourably. D. Within designated Primary and Secondary Shopping Frontages, the Council will give consideration to the granting of temporary permissions for meanwhile uses not compliant with (A-C) above where it can be demonstrated that the use will positively support the retail function of the town centre. The temporary use of a vacant ground floor unit will be supported where it can be demonstrated that the unit is being	management policy relating to primary and secondary frontages. There are no impact pathways present.

	actively marketed.	
DM43 Local Shopping Centres	A. Within local centres, as defined on the Haringey Policies Map, the use of ground floor units for appropriate town centre uses will be permitted where: a. The overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre; and b. An active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage.	No HRA implications. This outlines development management policy relating to local shopping centres. This policy does not define any location or type of development. There are no impact pathways present.
DM44 Neighbourhood Parades and other non-designated frontages	A. Within neighbourhood parades and other non-designated shopping frontages, the use of ground floor premises for appropriate town centre, community and economic uses will be supported where an active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage. B. Having regard to (A) above, the change of use from retail to other appropriate uses will only be permitted where: a. It is demonstrated that the unit has been marketed for a minimum of one year and there is no realistic prospect of it being used for a town centre use; and b. There are adequate alternative shopping facilities for local residents within a reasonable walking distance of 400 metres.	No HRA implications. This outlines development management policy relating to neighbourhood parades and other non-designated frontages. There are no impact pathways present.
DM45 Maximising the Use of Town Centre Land and Floorspace	A. The Council will seek to maximise the use of land and floorspace within town centres by encouraging new mixed use development, including new or re-used space above shops and commercial premises, having regard to: a. The role and function of the town centre; b. Impact on town centre vitality and viability; c. Compatibility of both the proposed and existing neighbouring uses; and d. Compliance with other policies. B. Subject to (A) above, where a proposal for residential use is acceptable the development must: a. Provide adequate access arrangements, including separate access for the residential element of the	No HRA implications. This outlines development management policy relating to maximising the use of town centre land and floorspace. There are no impact pathways present.

	proposal; and b. Not adversely impact on the function and appearance of the designated frontages and the town centre. C. Proposals requiring planning permission for the conversion of ground floor town centre premises to non-town centre uses, within designated and non-designated shopping frontages, will not be permitted.	
DM46 Betting Shops	A. Proposals for betting shops will only be permitted where: a. They are appropriately located within the metropolitan town centre, a district town centre or a local centre, having regard to Policy DM42 Primary and Secondary Frontages and DM43 Local Centres; and b. The total number of betting shops (including extant planning permissions) will not exceed 5% of the units within the town or local centre.	No HRA implications. This outlines development management policy relating to betting shops. There are no impact pathways present.
DM47 Hot Food Takeaways	A. The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school. B. Subject to (A) above, proposals for hot food takeaway shops will only be permitted where: a. The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres; b. Within neighbourhood parades, other non-designated frontages and elsewhere in the Borough, it is suitably demonstrated that the proposal will not result in an overconcentration of hot food takeaways; c. It can be demonstrated that there will be no adverse impact on the vitality and viability of the centre; d. There is no unacceptable impact on the amenity of neighbouring uses, either adjacent to and surrounding the development; and e. Access, servicing and parking arrangements do not result in an adverse impact on the safety of pedestrians and traffic flows or cause unacceptable increases to traffic and parking. C. The Council may impose conditions on any planning permission granted for a hot food takeaway to ensure appropriate control over noise, vibration and odours, waste management, hours of operation and community safety.	No HRA implications. This outlines development management policy relating to hot food takeaways. There are no impact pathways present.
Chapter 7. Community Infrastructure		
DM48	A. Proposals that fail to make adequate provision for affordable housing, infrastructure and other requirements such as essential site-specific transport infrastructure, and employment	No HRA implications

Use of Planning Obligations	contributions made necessary by the development, either through appropriate on-site provision or a planning obligation, will be refused.	This is a development management policy relating to Planning obligations. There are no impact pathways present.
DM49 Managing the Provision and Quality of Community Infrastructure	A. The Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community. B. Where a development proposal may result in the loss of a facility, evidence will be required to show: a. That the facility is no longer required in its current use; b. The loss would not result in a shortfall in provision of that use; and c. The existing facility is not viable in its current use and there is no demand for any other suitable community use on the site. C. The evidence should also provide relevant accounts and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time (minimum 12 months) and that no suitable user has been/or is likely to be found. D. The Council will consider supporting the consolidation of equal or enhanced provision to meet an identified need. E. Proposals for new and extended social and community facilities and the sharing facilities will be supported by the Council provided they: a. Are accessible by public transport, walking and cycling, preferably in town centres or local centres, growth areas or areas of change; b. Are located within the community that they are intended to serve; c. Provide flexible, multifunctional and adaptable space, where practicable; d. Do not have significant impact on road safety or traffic generation; and e. Protect the amenity of residential properties.	No HRA implications. This outlines development management policy relating to managing the provision and quality of community infrastructure. There are no impact pathways present.

	F. Major Developments may be required to accommodate new infrastructure as part of mixed use proposals where feasible, where an acute deficiency is identified through the Infrastructure Delivery Plan. G. Consideration should be given to the Council's Infrastructure Delivery Plan, and identify and plan for opportunities to provide local facilities on site and/or connections to existing facilities adjacent or close to the development site. H. Development proposals in locations where new infrastructure is planned must be compatible with, and provide the necessary safeguards and network links for, the future infrastructure project.	
DM50 Public Houses	A. The Council will resist proposals for redevelopment or changes of use to non-permitted uses that will result in the loss of a public house, unless it can be demonstrated that: a. The public house is no longer financially viable, as set out through a thorough marketing campaign; b. All feasible options for re-provision of the public house on site have been explored; or c. The redevelopment of the site would secure an over-riding public benefit. B. Any permitted change of use from Use Class A4 involving the alteration and/or the extension of a public house must ensure any proposed alteration does not affect the viability of the pub, the vitality of the area, detract from the character and appearance of the building and the street scene and any significant features of historic or character value are retained and, where possible, enhanced.	No HRA implications. This outlines development management policy relating to public houses. There are no impact pathways present.
Policy DM51 Day Nurseries and Child Care Facilities	A. The Council will only grant planning permission for day nursery schools, childminding, playgroups and related activities in residential dwellings (excluding flats) provided that: a. The proposal does not result in the loss of a dwelling; b. The floorspace occupied by the activity is ancillary to the dominant residential use; c. The noise generated by activity would not adversely affect the amenities nearby properties; d. The activity would not adversely affect the character of the surrounding area or result in the loss of privacy of neighbouring properties; e. Traffic movements and parking arrangements of parents/carers and staff do not detrimentally affect road safety or traffic generation; and f. The property can accommodate satisfactorily the number of children proposed.	No HRA implications. This outlines development management policy relating to public day nurseries and child care facilities. There are no impact pathways present.

	B. The Council will expect all planning applications for day nurseries and child care facilities in residential buildings and other non-residential buildings to outline: a. The numbers of staff and other visitors expected to attend the facility; b. The days of the week and the hours when the facility will operate; c. The nature of the activity; d. The car parking and transport patterns, including servicing of the use; e. Disabled access in and around the building to promote access for all; and f. The steps taken to minimise the noise impact of such uses.	
DM52 Burial Space	A. The Council will protect all existing burial spaces and seek to re-use existing spaces for new burial spaces where appropriate B. In determining any application for the provision of new burial spaces, applications should demonstrate the following: a. The provision meets the burial requirements of the various ethnic and religious groups within the Borough; b. The spaces are located within close proximity to the communities served by spaces to reduce the travelling distance to visit the deceased; and c. Any affect on the water table and the possibility of flooding or water logging cause by the new provision is minimised.	No HRA implications. This outlines development management policy relating to burial spaces. There are no impact pathways present.
DM53 Hotels and Visitor Accommodation	A. Hotels and other visitor accommodation are generally appropriate in locations within an existing town centre or at a location well served by public transport. B. In these locations proposals for new hotel and visitor accommodation will only be supported where they: a. Do not result in adverse impacts on residential amenity, including cumulative impacts; b. the proposal does not result in the loss of housing; c. Provide appropriate arrangements for pick up / drop off, service delivery vehicles and coaches,	No HRA implications. This outlines development management policy relating to hotels and visitor accommodation. This policy does not define and location or quantity of hotels or visitor accommodation. There are no impact pathways present.

	appropriate to the size of the hotel or visitor accommodation; d. Provide an adequate standard of amenity for occupants; e. Are inclusive, providing at least 10% of all hotel rooms to wheelchair accessible standards (the 10% wheelchair accessible standard rooms must be fully fitted from occupation); f. are not permanently occupied; g. Where appropriate, incorporate ancillary facilities which are open for public use and create employment opportunities for local residents, such as restaurants, gyms and conference facilities; and h. Where appropriate, create active frontages on the ground floor.	
Policy DM54 Facilitating Telecommunications Development	The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to: a. Be designed in such a way as to be capable of facilitating delivery of high speed broadband technology; b. Demonstrate how they will improve communications infrastructure in areas of poor broadband connectivity, as identified in Haringey's Infrastructure Delivery Plan, including through connection of the development to a nearby trunk network; and c. Deliver "ultrafast" connections in Regeneration Areas; and d. Be designed to meet the requirements of Policy DM3.	No HRA implications. This outlines development management policy relating to the facilitation of telecommunications development. There are no impact pathways present.
Policy DM55 Regeneration/ Masterplanning	A. The Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in this Plan. Applicants will be required to demonstrate how the proposal: 1. Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP. 2. Will integrate and complement successfully with existing and proposed neighbouring developments 3. Optimizes development outcomes on the site	No HRA implications. This outlines development management policy relating to regeneration master planning. There are no impact pathways present.
Policy DM56	A. The Council will support land assembly to achieve comprehensive development, and will use compulsory purchase powers, only where necessary, to assemble land for development within the	No HRA implications.

Supporting Site Assembly	borough where: a. Landowners and developers can demonstrate that they have: i. A viable, deliverable and Local Plan compliant scheme; and ii. Have made all reasonable attempts to acquire, or secure an option over, the land/building(s) needed, through negotiation. b. Comprehensive redevelopment of the assembled site is required to deliver the site's allocation (including the requirements of a Masterplan where stated in the Plan); and c. The development proposed for the assembled site would contribute to the delivery of the Local Plan's objectives. B. Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability	This outlines development management policy relating to site assembly. There are no impact pathways present.

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1 Introduction

1.1 Background to the project

- 1.1.1 AECOM has been appointed by the London Borough of Haringey (referred to as “Haringey Council” and “the Authority”) to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of Haringey’s Site Allocations DPD on the Natura 2000 network and Ramsar sites in support of the already adopted Haringey Local Plan: Strategic Policies.
- 1.1.2 Haringey’s Local Plan: Strategic Policies document was formally adopted by the Full Council on 18th March 2013. The Local Plan, along with the saved Unitary Development Plan policies, sets out a vision and key policies for the future development within the Borough from 2013 through to the end of the plan period (2026). It provides special policies outlining local and strategic development within the Borough, including housing, employment, leisure, and retail provision. In support of the Local Plan, in 2010 a Habitats Regulations Assessment was undertaken¹. In February 2015, an update to Haringey’s Strategic Policies (Alterations to Strategic Policies document) was published for public consultation. The Alterations to Strategic Policies document reflected the increase in the Borough’s strategic housing delivery target of 19,802 net new dwellings 2011-2026; new Growth Areas; strategic improvements to, or renewal of, Haringey’s housing estates; an additional Locally Significant Industrial Site; and Local Employment Areas. HRA has been undertaken of this document (subject to consultation), which screened out most impact pathways including recreational pressure from the increase in net new dwellings, with the residual likely significant effect remaining of disturbance to internationally designated features resulting from construction activities where sites were located within close proximity to the Lee Valley SPA and Ramsar site². These HRA documents will be used as a basis for this assessment. These documents undertook Habitats Regulations Assessment (HRA) of the following internationally designated sites: The Lee Valley Ramsar Site; The Lee Valley SPA; and Epping Forest SAC.
- 1.1.3 The objective of this assessment is to:
- identify any aspects of Haringey’s Site Allocations DPD that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites or internationally designated sites (Special Areas of Conservation (SACs)), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites³), either in isolation or in combination with other plans and projects; and
 - to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

1.2 Current legislation

- 1.2.1 The need for Habitats Regulations Assessment is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to “maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the European sites themselves, although the sites have a significant role in delivering favourable conservation status.
- 1.2.2 Within the UK, Protected Areas for nature conservation include, those established under National legislation (e.g. Sites of Special Scientific Interest (SSSI)), areas established under European Union Directives/European initiatives (including the Natura 2000 network of sites), and protected areas established under Global Agreements (e.g. Ramsar sites).
- 1.2.3 With relevance to this report, Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive 1979. They are classified for rare and vulnerable birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. Special Areas of Conservation (SAC) are strictly protected sites designated under Article 3 of the EC Habitats Directive, which requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788

¹ Hyder. (2010). London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment. http://www.haringey.gov.uk/sites/haringeygovuk/files/habitats_regulations_assessment.pdf [Accessed 23/09/15]

² AECOM (2015). Habitats Regulations Assessment Screening Report – Alterations to Haringey’s Strategic Policies

³ Wetlands of International Importance designated under the Ramsar Convention 1979

species identified in Annexes I and II of the Directive (as amended)⁴. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). Ramsar sites are wetlands of international importance designated under the Ramsar Convention.

- 1.2.4 The Conservation of Habitats and Species Regulations 2010 require that land use plans are subject to Appropriate Assessment (AA) where they are likely to have a significant effect on a Natura 2000 site.
- 1.2.5 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network is maintained.
- 1.2.6 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that sites conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Figure 1: The Legislative Basis for Appropriate Assessment

- 1.2.7 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘appropriate assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.3 Scope of the Project

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of HRA of a supporting Local Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary ‘zones’. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Local Plan area boundary; and
- Other sites shown to be linked to development within the Borough boundary through a known ‘pathway’.

⁴ <http://jncc.defra.gov.uk/>

- 1.3.2 Briefly defined, pathways are routes by which a change in activity provided within the Alterations to Strategic Policies 2011-2026 document can lead to an effect upon an internationally designated site. Guidance from the former Department of Communities and Local Government states that the HRA should be *'proportionate to the geographical scope of the [plan policy]'* and that *'an AA need not be done in any more detail, or using more resources, than is useful for its purpose'* (CLG, 2006, p.6). More recently, the Court of Appeal⁵ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *'achieved in practice'* to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)⁶. In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'*.
- 1.3.3 No internationally designated sites are located within the London Borough of Haringey's boundary.
- 1.3.4 The following internationally designated sites are considered within the Habitats Regulations Assessment of Haringey's Alterations to Strategic Policies 2011-2026 document and are located within 20km of the London Borough of Haringey's authority boundary. These sites could potentially have impact pathways present that could interact with Haringey's Alterations to Strategic Policies document:
- Lee Valley SPA and Ramsar site;
 - Epping Forest SAC;
 - Richmond Park SAC;
 - Wimbledon Common SAC; and
 - Wormley-Hoddesdonpark Woods SAC.
- 1.3.5 During an initial sieving exercise to screen out internationally designated sites (e.g. no realistic impact pathways present), the following internationally designated sites can be sieved out from further assessment due to the distances involved.
- Wormley-Hoddesdonpark Woods SAC located 12.9km from the borough boundary;
 - Richmond Park SAC located 14.3km from the borough boundary, and;
 - Wimbledon Common SAC located 14.7km from the borough boundary.
- 1.3.6 These sites are not considered further within this document.
- 1.3.7 There are three internationally designated sites that are located within a sufficiently close distance that the presence of impact pathways linking to Haringey's Site Allocations DPD cannot be screened out. These are:
- Lee Valley SPA and Ramsar site, located immediately adjacent to the London Borough of Haringey to the east; and,
 - Epping Forest SAC, located 3km east from the London Borough of Haringey.
- 1.3.8 Details of Lee Valley SPA and Ramsar sites and Epping Forest SAC can be found in Appendix A. Appendix B, Figure 1 illustrates the location of the internationally designated site in relation to the London Borough of Haringey's boundary.
- 1.3.9 The Habitats Regulations Assessment undertaken for the Local Plan in 2010⁷ and of the Alterations to Haringey' Strategic Policies document (subject to consultation)⁸, investigated the following impact pathways upon the Lee Valley and Epping Forest internationally designated sites:
- 1.3.10 Epping Forest SAC:
- Disturbances from recreational activities.

⁵ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁶ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

⁷ Hyder. (2010). London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment. http://www.haringey.gov.uk/sites/haringeygovuk/files/habitats_regulations_assessment.pdf [Accessed 23/09/15]

⁸ AECOM (2015). Habitats Regulations Assessment Screening Report – Alterations to Haringey's Strategic Policies

1.3.11 Lee Valley SPA and Ramsar site:

- Disturbances from recreational activities;
- Disturbances from construction activities;
- Urbanisation;
- Atmospheric Pollution;
- Water abstraction; and,
- Water quality.

1.3.12 The HRA for Haringey's Strategic Policies documents resulted in a single residual impact pathway unable to be screened out from further consideration. This was disturbances from construction activities impacting on avian features of the Lee Valley SPA and Ramsar site. These overarching Local Plan HRA documents should be referred to for further background to this DPD

1.3.13 As previously noted, Haringey's Strategic Policies documents reflect the increase in the Borough's strategic housing delivery target to 19, 802 net new dwellings to the end of the Plan period (to 2026). The HRA's for these documents screened out all impact pathways upon Epping Forest SAC.

1.3.14 Haringey's Site Allocations DPD provides for 7,698 net new dwellings through the Plan period⁹. It is noted that not all site allocations are for residential development. Additionally, some site allocations only detail the location and do not provide details for use. It is assumed, that where this detail is lacking, these sites will provide either new residential development, or employment uses, in line with the levels detailed within Haringey's Local Plan: Strategic Policies documents and will not deviate from this overarching document. In other words, the overall housing number for Haringey is not changed from that in the Strategic Policies document.

1.3.15 Impact pathways relating to increases in levels of housing, and employment uses were screened out within the higher tier documents. As such, this HRA document effectively only screens impact pathways relating to the locations of the specific site allocations identified within Haringey's Site Allocations DPD upon the Lee Valley SPA and Ramsar site. The impact pathway to be assessed is:

- Disturbance from construction activities
- Water quality from construction activities in close proximity to the Lee Valley SPA and Ramsar site.

1.4 This Report

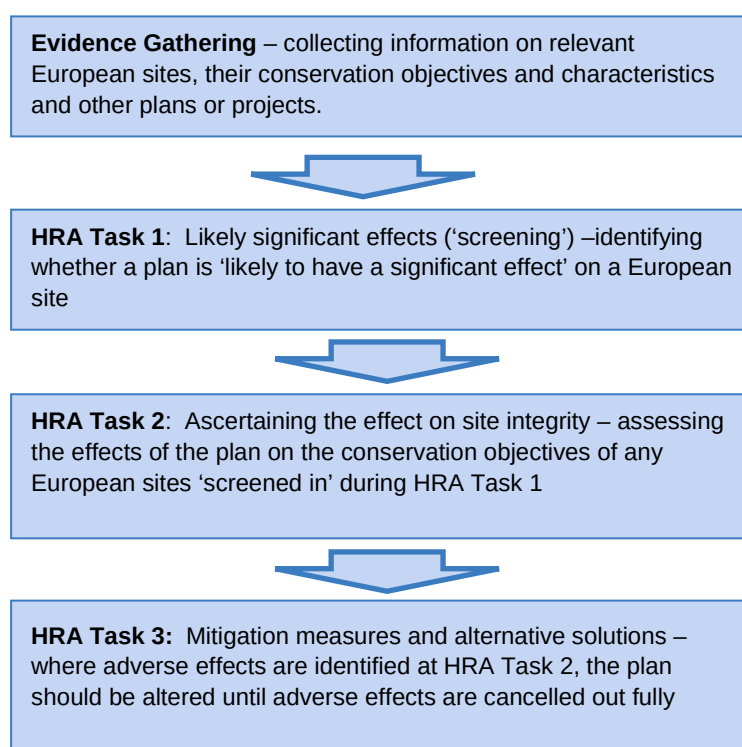
1.4.1 Chapter 2 of this report summarises the methodology for the assessment. Chapter 3 identifies the possible pathways by which adverse effects on European protected sites could arise. This chapter also considers each policy amendment within Haringey's Site Allocations DPD document, assessing possible pathways upon internationally designated sites that may be vulnerable, determine likely significant effects, based on key environmental conditions required to maintain the integrity of these sites. The screening exercise concludes by either screening out any possible impacts or by determining that mitigation or avoidance measures are required. Where mitigation strategies are deemed necessary, potential approaches are discussed. In combination effects with other plans on each internationally designated site are also considered within Chapter 4. Background information on all the internationally designated sites discussed in this report is presented within Appendix A. Figure 1 of Appendix B presents a map showing all internationally important wildlife sites discussed.

⁹ Not all the additional housing Haringey expects over the plan period will be specifically allocated in the Site Allocations DPD. Housing will also be delivered through site allocations in Area Action Plans as well as through windfall development of smaller and non-strategic sites. In addition, a number of housing developments have already been completed within the plan period.

2 Methodology

2.1 Introduction

- 2.1.1 This HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist¹⁰. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006¹¹. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance¹² as has the RSPB¹³. Both of these have been referred to alongside the guidance outlined in Section 1.2 in undertaking this HRA.
- 2.1.2 Figure 2 below, outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.



Source: CLG, 2006

Figure 2- Four-Stage Approach to Habitats Regulations Assessment

2.2 HRA Task 1 - Likely Significant Effects (LSE)

- 2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a likely significant effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:
- "Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"*
- 2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon internationally designated sites, usually because there is no mechanism for an adverse interaction with internationally designated sites. This

¹⁰ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

¹¹ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

¹² http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

¹³ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

stage is the subject of Chapter 3 of this report (See Appendix C, Table 1 for the screening table), and goes a step further than a scoping report that was able to scope out sites listed in paragraphs 1.3.5 and 1.3.10. Those particular sites could be scoped out regardless of the nature and scale of any proposed development, whereas screening is needed where there is a potential pathway of impact and the scale, nature and location of development determines whether this actually exists.

- 2.2.3 The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the former Department of Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

2.3 Confirming Other Plans and Projects That May Act In Combination

- 2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the internationally designated site(s) in question.
- 2.3.2 It is neither practical nor necessary to assess the 'in combination' effects of the DPD within the context of all other plans and projects within this area of England. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial allocations proposed for neighbouring and nearby authorities over the lifetime of the Plan. A good place to start is the London Plan (2015)¹⁴
- 2.3.3 In considering the potential for regional housing development on internationally designated sites, the primary consideration for many sites is the impact of visitor numbers – i.e. recreational pressure. Other pathways of impact described in more detail in Chapter 3 include disturbances from construction activities, urbanisation, water quality and water quantity, and air quality. Whilst these are also strongly related to housing provision, the actual geographic impact must also be considered within the context of relevant infrastructure.

Table 1: Housing Levels to be Delivered in Neighbouring Authorities

Local Authority	Total housing (taken from the London Plan, 2015 ¹⁵) Minimum ten year target 2015-2025	Total housing (taken from the London Plan, 2015) Annual monitoring target 2015-2025
London Borough of Barnet	23,489	2,349
London Borough of Camden	8,892	889
London Borough of Enfield	7,976	798
London Borough of Islington	12,641	1,264
London Borough of Hackney	15,988	1,599
London Borough of Waltham Forest	8,620	862

- 2.3.4 There are other plans and projects that are relevant to the 'in combination' assessment and the following have all been taken into account in this assessment:

Plans

- **London Borough of Haringey Local Plan: Strategic Policies.** Adopted March 2013.
- **London Borough of Haringey Local Plan: Alterations to Strategic Policies.** September 2015 (not yet subject to consultation).
- **The London Plan.** The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Published March 2015.
- **The London Plan.** Sub Regional Development Framework – North London. Published May 2006.

¹⁴ Mayor of London (March, 2015). The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Also referred to as Further Alterations to the London Plan (FALP)

¹⁵ Ibid

- **The London Plan.** Sub Regional Development Framework – Central London. Published May 2006.
- **North London Waste Plan.** This is currently in preparation; the draft is due for consultation in 'Summer/ Autumn 2015'.
- **London Borough of Barnet Local Plan Core strategy DPD.** Adopted September 2012.
- **London Borough of Camden Core Strategy.** Adopted November 2010.
- **London Borough of Enfield Core Strategy.** Adopted November 2010.
- **London Borough of Islington Core Strategy.** Adopted February 2011.
- **London Borough of Hackney Core Strategy: Local Development framework.** Adopted December 2010.
- **London Borough of Waltham Forest Local Plan Core Strategy.** Adopted March 2012
- **Walthamstow Wetlands.** Planning permission granted 2014.

2.3.5 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

3 Likely Significant Effects

3.1 Introduction

3.1.1 In carrying out an HRA it is important to determine the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with internationally designated sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development (Plan) can lead to an effect upon an internationally designated site. Following the HRA of Haringey's Local Plan: Strategic documents and a brief sieve of Haringey's Site Allocation DPD, the following impact pathways are considered within this document:

- Disturbance from construction activities in close proximity to the Lee Valley SPA and Ramsar site; and,
- Water quality from construction activities in close proximity to the Lee Valley SPA and Ramsar site.

3.1.2 The screening assessment (see Appendix C, Table 1) identified one site allocation that has potential to result in impact pathways that link to Lee Valley SPA and Ramsar site. These are:

- Leabank and Lemsford Close (SA65), located 0.03km west of the designated site

3.1.3 These site allocations are for residential development within close proximity to the SPA and Ramsar site. They provide for development either between the rail line and the SPA and Ramsar site, or in very close proximity to the SPA and Ramsar site. Works in these locations have potential to cause disturbance to avian bird features of the internationally designated site (sites such as shoveler, gadwall and bittern) during the construction phase of the development. In addition to this, there is potential for surface runoff from these sites to enter the designated sites.

3.1.4 The remainder of the Site Allocations within the DPD were screened out from further consideration as they were either located west of the rail line to the west of the designated site as this line will already provide levels of noise and visual disturbance, or were considered to be a large enough distance away from the designated site that disturbances from construction activities cannot conceivably link to the SPA and Ramsar site.

3.2 Location specific site runoff

3.2.1 The Walthamstow Reservoirs portion of the Lee Valley SPA and Ramsar site lies in close proximity to the Leabank and Lemsford Close (SA65) site allocation. There is potential for point source pollution events to arise from construction activities within this site. The River Lee and River Lee Navigation separate the reservoirs from the allocated sites, and do not in themselves form a part of the SPA or Ramsar within Haringey. It is acknowledged that these waterways will be connected to the reservoirs of the SPA and Ramsar site. Standard construction methodologies and standard operational phase requirements include provisions to ensure no runoff leaves a site. As such, this impact pathway can be screened out from further consideration. And provided standard methodologies are followed, no likely significant effects will result.

3.3 Disturbance from Construction Activities

3.3.1 As previously noted, the Lee Valley SPA and Ramsar site lies immediately adjacent to the London Borough of Haringey and is theoretically vulnerable, to the effects of disturbances from construction activities resulting from development in close proximity to the internationally designated site within Haringey.

3.3.2 It is therefore necessary to perform a further screening assessment to determine whether site allocations from Haringey's Site Allocations DPD identified in paragraph 3.1.2 could lead to a likely significant effects, either alone or 'in combination' with other plans and projects, through disturbance from construction activities, on this internationally designated site.

3.3.3 Construction activities within close proximity of an internationally designated site have potential to:

- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl resulting from visual and acoustic disturbances.

- 3.3.4 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding¹⁶. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately the survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds¹⁷.
- 3.3.5 The potential for disturbance may be less in winter than in summer. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) activity (recreational) can result in quantifiable disturbance:
- Underhill et al¹⁸ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
 - Evans & Warrington¹⁹ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to displacement of birds resulting from greater recreational activity on surrounding water bodies at weekends relative to week days.
 - Tuite et al²⁰ used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that on inland water bodies shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.
 - Pease et al²¹ investigated the responses of seven species of dabbling ducks to a range of potential causes of disturbance, ranging from pedestrians to vehicle movements. They determined that walking and biking created greater disturbance than vehicles and that gadwall were among the most sensitive of the species studied.
 - A three-year study of wetland birds at the Stour and Orwell SPA, Ravenscroft²² found that walkers, boats and dogs were the most regular source of disturbance. Despite this, the greatest responses came from relatively infrequent events, such as gun shots and aircraft noise. Birds seemed to habituate to frequent 'benign' events such as vehicles, sailing and horses, but there was evidence that apparent habituation to more disruptive events related to reduced bird numbers – i.e. birds were avoiding the most frequently disturbed areas. Disturbance was greatest at high tide and on the Orwell, but birds on the Stour showed greatest sensitivity.
- 3.3.6 However the outcomes of many of these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their

¹⁶ Riddington, R. et al. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

¹⁷ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

¹⁸ Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

¹⁹ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pitlake near London. *International Journal of Environmental Studies* 53: 167-182

²⁰ Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

²¹ Pease, M.L., Rose, R.K. & Butler, M.J. 2005. Effects of human disturbances on the behavior of wintering ducks. *Wildlife Society Bulletin* 33 (1): 103-112.

²² Ravenscroft, N. (2005) Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. Era report 44, Report to Suffolk Coast & Heaths Unit.

population²³. A literature review undertaken for the RSPB²⁴ also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on internationally designated sites.

- 3.3.7 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration (such as those often associated with construction activities). Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.3.8 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 3.3.9 Disturbances from construction activities such as noise and visual disturbances have potential to result in likely significant effects upon avian features of an internationally designated site such as the Lee Valley SPA and Ramsar site features (wintering bittern, and migratory gadwall and shoveler). Construction activities associated with land in close proximity to the internationally designated site such as Leabank and Lemsford Close (SA65) have potential to result in these disturbances.
- 3.3.10 Lee Valley internationally designated site is located within an urban area so will already be subject to existing levels of visual and acoustic disturbance. However, impacts from construction activities in close proximity to the designated site still have potential to impact upon the site's features.
- 3.3.11 DMP 19 (Nature Conservation) of Haringey's overarching Local Plan: Development Management Policies document states:
- 3.3.12 *'B. Development that has a direct or indirect negative impact upon important ecological assets will only be permitted where the harm cannot reasonably be avoided and it has been demonstrated that appropriate mitigation can address the harm caused.'*
- 3.3.13 SP13 (Open Space and Biodiversity) of Haringey's overarching Local Plan: Strategic Policies documents states:
- 3.3.14 *'All development shall protect and improve sites of biodiversity and nature conservation...'*
- 3.3.15 At an overarching level, these policies provide protection for conservation sites from construction activities. However, at this higher tier it was not appropriate to assess site specific impacts, such as those identified within the Site Allocations DPD.
- 3.3.16 Guidance from the former Department of Communities and Local Government states that the HRA should be *'proportionate to the geographical scope of the [plan policy]'* and that *'an AA need not be done in any more detail, or using more resources, than is useful for its purpose'* (CLG, 2006, p.6). More recently, the Court of Appeal ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *'achieved in practice'* to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy). In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'*. At the Plan level (including the Site Allocations DPD), specific details relating to construction activities and practices have not been identified. However, it can be determined that appropriate avoidance measures such as appropriate timing of works, pertinent choice of machinery and the use of acoustic and visual hording could feasibly be incorporated within the site specific Planning Application for Leabank and Lemsford Close (SA65) to prevent likely significant effects from resulting.
- 3.3.17 The avoidance measures noted above do not provide deliverability issues for the individual site allocations. It is valid to defer detailed site specific screening of disturbances resulting from construction activities to the project planning stage of the site specific application. As such, this impact

²³ Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, 97, 265-268

²⁴ Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

pathway can be screened out from further consideration, both alone, and in-combination with other projects or plans.

4 In-combination with Other Projects or Plans

- 4.1.1 The HRA's for Haringey's Local Plan: Strategic Policies assessed the quantum of development within the London Borough of Haringey. It assessed the impacts upon both the Lee Valley and Epping Forest internationally designated sites resulting from an increase in residential, employment and industrial development. Within the Local Plan: Strategic Policy HRAs the following quantum of development was assessed:
- 19,802 net new dwellings
 - 23,000 m² of employment floorspace (including Class B uses including light industry, logistics, warehousing and storage facilities)
- 4.1.2 This provision of development has the potential to link with internationally designated sites as follows:
- 4.1.3 Epping Forest SAC:
- Disturbances from recreational pressure.
- 4.1.4 Lee Valley SPA and Ramsar site:
- Disturbances from recreational pressure;
 - Disturbances from construction activities;
 - Urbanisation;
 - Atmospheric Pollution;
 - Water abstraction; and,
 - Water quality.
- 4.1.5 The HRA for Haringey's Local Plan: Strategic Policies documents screened out all impact pathways with the exception of a single residual impact pathway; disturbance from construction activities (as discussed in Chapter 3).
- 4.1.6 Haringey's Site Allocations DPD provides for 7,698 net new dwellings, which is in line with the figures identified in the overarching Local Plan: Strategic Policies documents. This DPD does not define a specific quantum for employment development; however, it is assumed that any quantum of employment development within Site Allocations will be in line with the 23,000m² of employment floorspace outlined within the Local Plan: Strategic Policies documents. The HRAs for Haringey's Local Plan: Strategic Policies documents, screened out the impact pathways noted above in paragraphs 4.1.3 and 4.1.4, alone and in-combination with other projects or plans. As such, there are no in-combination residual impact pathways that could result in likely significant effects upon the Lee Valley and Epping Forest designated sites alone or in-combination with other projects or plans.

5 Conclusion

5.1.1 Impact pathways assessed against Lee Valley SPA and Ramsar site are:

- Disturbance from construction activities
- Water quality from construction activities in close proximity to the Lee Valley SPA and Ramsar site.

5.1.2 Both these impact pathways can be screened out both alone and in-combination with other projects or plans. This is due to the following factors:

- Standard construction methodologies and standard operational phase requirements include provisions to ensure no runoff leaves a site, enabling this pathway to be screened out
- The ability of project specific mitigation measures to be feasibly incorporated at the appropriate level (e.g. not at the Plan level, but rather at the site specific project level) where the competent authority (Council) is satisfied that proposed mitigation could be '*achieved in practice*'; and,
- The urban setting of Lee Valley SPA and Ramsar site and Stoke Newington reservoirs.

5.1.3 In addition to this, there are no residual impact pathways present that could act alone or in-combination with other projects or plans.

Appendix A. Background of Internationally Designated Sites

A.1 Lee Valley SPA and Ramsar site

A.1.1 Introduction

The Lee Valley SPA and Ramsar site is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris*. Lee Valley SPA is split into two sections, a northern and a southern. The southern section is located adjacent to the eastern boundary of the London Borough of Haringey. It contains Walthamstow Reservoir SSSI and Walthamstow Marshes SSSI. The northern section is located approximately 9.5km north of the Borough which contains Turnford and Chestnut Pits SSSI.

A.1.2 Qualifying Features

The site qualifies as an **SPA** for the following Annex I species:

- Wintering bittern *Botaurus stellaris*. 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)
- Migratory gadwall *Anas strepera*. 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
- Migratory shoveler *Anas clypeata*. 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)

The site qualifies under the following **Ramsar** criterion

Criterion 2: The site supports the nationally scarce plant species:

- whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Criterion 6: Species/populations occurring at levels of international importance.

Species with peak counts in spring/autumn:

- Northern shoveler, *Anas clypeata*, (NW & C Europe) 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9- 2002/3)

Species with peak counts in winter:

- Gadwall, *Anas strepera strepera*, (NW Europe) 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3)

A.1.3 Conservation Objectives of the SPA

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; the extent and distribution of the habitats of the qualifying features.

- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

A.1.4 Environmental Vulnerabilities

- Water quality: eutrophication from waste water. This is being addressed by AMP3 funding under the urban Waste Water Treatment Directive
- Water quantity: over extraction of surface water for public consumption, notably during drought periods. This is managed via Environment Agency Review of Consents.
- Recreational pressure: this is managed by zoning of waterbodies within the Lee Valley Regional Park.

A.2 Epping Forest SAC

A.2.1 Introduction

Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains and scattered wetland. The semi-natural woodland is particularly extensive, forming one of the largest coherent blocks in the country. Most is characterised by groves of over-mature pollards and these exemplify all three of the main wood-pasture types found in Britain: beech-oak, hornbeam-oak and mixed oak. The Forest plains are also a major feature and contain a variety of unimproved acid grasslands which have become uncommon elsewhere in Essex and the London area. In addition, Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

A.2.2 Qualifying Features

The site is designated as an **SAC** for the following features:

Annex I habitats:

- Atlantic *acidophilous* beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion roburi-petraeae* or *Illici-Fagenion*); Beech forests on acid soils
- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

Annex II species:

- Stag beetle *Lucanus cervus*

A.2.3 Conservation Objectives of the SAC

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

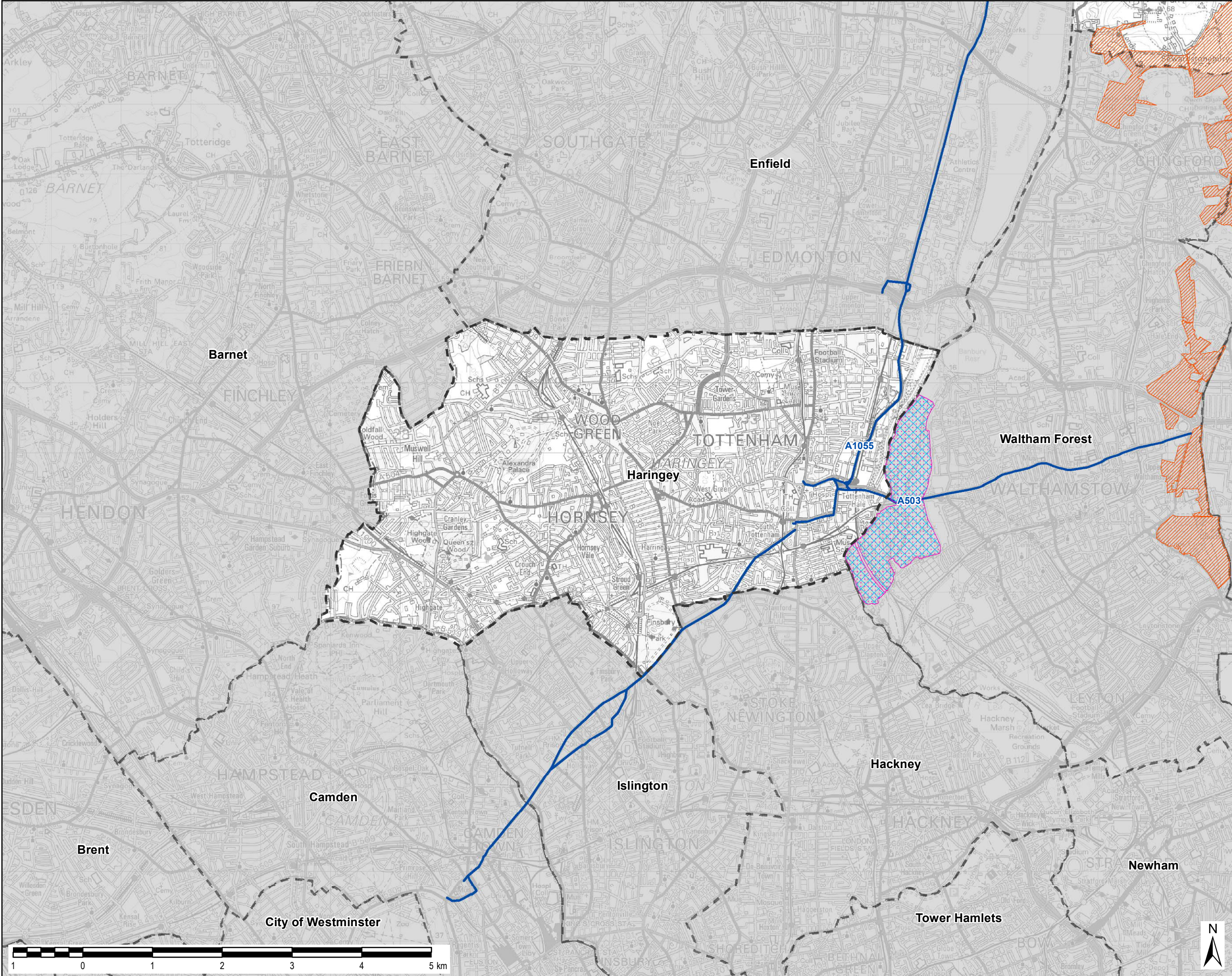
- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

A.2.4 Environmental Vulnerabilities

- Habitat management: After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995.
- Atmospheric pollution
- Lack of deadwood

Appendix B. Figure 1: Locations of Internationally Designated Sites

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LEGEND

- Haringey Borough Boundary
- London Borough Boundary
- Epping Forest Special Area of Conservation
- Lee Valley Ramsar Site
- Lee Valley Special Protection Area
- A Road

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Purpose of Issue
DRAFT

Client
HARINGEY COUNCIL

Project Title
HARINGEY HRA

Drawing Title
**HARINGEY COUNCIL
ENVIRONMENTAL DESIGNATIONS**

Drawn S. Masnikosa	Checked J. Waters	Approved I. Hoffman	Date 10/11/2015
AECOM Internal Project No. 47076094		Scale @ A3 1:50,000	

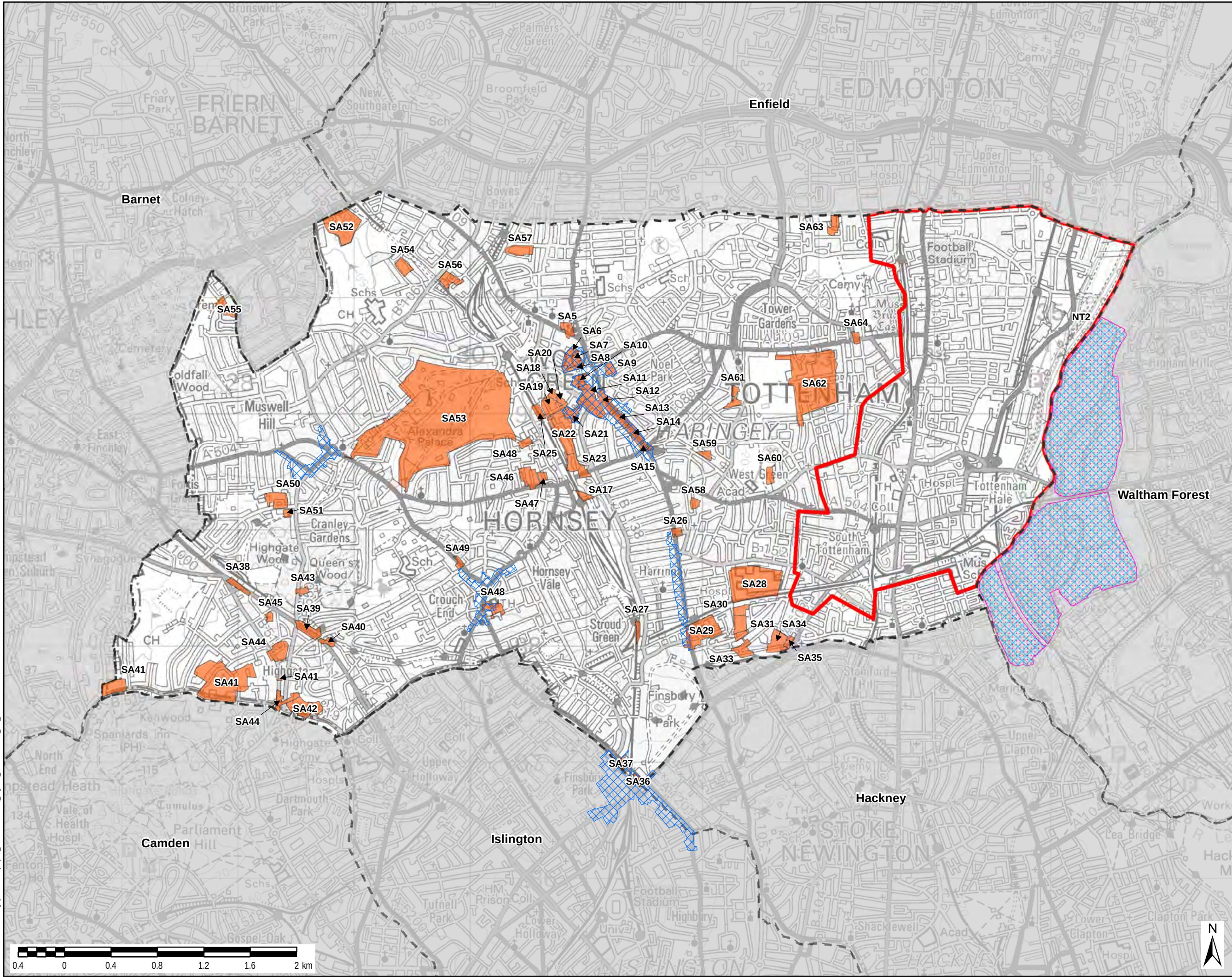
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Appendix B. Figure 2: Locations of Site Allocations

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LEGEND

- Haringey Borough Boundary
- London Borough Boundary
- Tottenham Area Action Plan
- Town Centre
- Site Allocation
- Lee Valley Ramsar Site
- Lee Valley Special Protection Area

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FIGURE 2			01

Appendix C. Screening Table of Haringey's Site Allocations

Sites identified in green, can be screened out from further consideration. Sites identified in orange are subject to further assessment within Chapter 3 of this document. It should be noted that this table does not identify in-combination effects. These are discussed in Chapter 4.

Table 1: Screening of Haringey's Site Allocations

Allocation Name	Allocation Code	Net Housing	Distance from internationally designated site (km)	Screening outcome (alone, not in-combination)
Leabank and Lemsford Close	SA65	65	0.03	Potential HRA implications. Impact pathways present: - Disturbance from construction activities. - Water quality NB: See in-combination assessment section
Summersby Road	SA43	124	5.77	No HRA implications. No impact pathways present. NB: See in-combination assessment section.
Wightman Rd	SA27	60	2.94	
460-470 Archway Rd	SA38	90	6.27	
Clarendon Rd South	SA23	206	3.47	
North of Hornsey Rail Depot	SA17	70	3.4	
Cranwood Care Home	SA51	41	5.96	
Overbury & Eade Roads	SA34	220	1.7	
Land behind Seven Sisters & Tewkesbury Rd	SA35	70	1.65	
Arena Retail Park	SA29	693	2.25	
Vale Rd & Eade Rd	SA33	45	2.02	
Arena Design Centre	SA30	140	1.98	
Omega Works	SA32	66	2.03	
Finsbury Park Bowling Alley	SA36	164	3.27	
18-20 Stroud Green Rd	SA37	63	3.36	
Barber Wilson	SA61	66	2.55	
Bury Rd Car Park	SA13	191	3.31	
Westbury & Whymark Ave	SA15	95	3.09	
Turnpike Lane Triangle	SA16	48	3.03	
16-54 Wood Green High Rd	SA14	334	3.14	
Mecca Bingo	SA9	191	3.6	
Green Riding's House	SA6	93	3.98	
Wood Green Bus Garage	SA7	310	3.92	
Station Rd Offices	SA8	241	3.89	
Morrison's Wood Green	SA10	239	3.8	
WG Cultural Quater (north)	SA18	89	3.97	
NW of Clarendon Square	SA24	22	3.9	
WG Cultural Quarter (east)	SA20	124	3.87	
WG Cultural Quarter (south)	SA19	265	3.9	
Clarendon Square Gateway	SA21	195	3.71	
L/A to Cornonation Sidings	SA25	87	4	
Hillcrest	SA44	34	5.97	
Former Highgate Rail Station	SA39	41	5.68	
The Red House	SA58	33	2.5	

Park View & Durnsford Road	SA56	132	5.14	
Cross Lane	SA47	60	3.83	
LB Civic Centre	SA5	108	4.08	
Hawes & Curtis	SA26	81	2.59	
Haringey Professional Centre	SA59	61	2.54	
Keston Centre	SA60	87	1.97	
Park Road & Lynton Rd	SA49	51	4.43	
Coppetts Wood Hospital	SA55	21	6.81	
Wood Green Library	SA11	358	3.69	
St Ann's Hospital	SA28	456	1.69	
Highgate Bowl	SA42	42	5.75	
The Roundway	SA64	56	1.73	
Highgate School	SA41	0	6.05	
Crusader Industrial Estate	SA31	0	2	
The Mall	SA12	0	3.45	
Alexandra Palace	SA53	0	4.17	
Tunnel Gardens	SA54	0	5.57	
Gonnerman Antiques	SA40	0	5.57	
Clarendon Square	SA22	0	3.66	
Hornsey Town Hall	SA48	0	4.09	
Hornsey Depot	SA46	0	3.88	
St Luke's Hospital	SA50	0	5.99	
Highgate Magistrate Court	SA45	0	6.09	
Pinkham Way	SA52	0	6.15	
Broad Water Farm	SA62	0	1.81	
Myddleton Road	SA57	0	4.65	
The Selby Centre	SA63	0	2.27	

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Habitats Regulations Assessment Screening Report – Tottenham Area Action Plan (Publication Version December-January 2015)

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1 Introduction

1.1 Background to the project

AECOM has been appointed by London Borough of Haringey (referred to as “Haringey Council” and “the Authority”) to assist in undertaking a Habitats Regulations Assessment (HRA) of the potential effects of the Tottenham Area Action Plan (Publication Version December-January 2015) (known henceforth as the “AAP”) on the Natura 2000 network and Ramsar sites in support of the Haringey’s Local Plan: Strategic Policies documents.

1.1.1 The Haringey Local Plan: Strategic Policies document was formally adopted by the Full Council on 18th March 2013. The Local Plan, along with the saved UDP policies (Unitary Development Plan), sets out a vision and key policies for the future development within the Borough from 2013 through to the end of the plan period (2026). It provides special policies outlining local and strategic development within the Borough, including housing, employment, leisure, and retail provision. In support of the Local Plan, in 2010 a Habitats Regulations Assessment was undertaken¹. In February 2015, an update to Haringey’s Strategic Policies (Alterations to Strategic Policies document) was published for public consultation. The Alterations to Strategic Policies document reflected the increase in the Borough’s strategic housing delivery target of 19,802 net new dwellings 2011- 2026; new Growth Areas; strategic improvements to, or renewal of, Haringey’s housing estates; an additional Locally Significant Industrial Site; and Local Employment Areas. As part of the Local Plan process a Site Allocations DPD has also been published. HRA has been undertaken of these documents (subject to consultation), which screened out most impact pathways, with the residual likely significant effect remaining of disturbance to internationally designated features from construction activities². These HRA documents will be used as a basis for this assessment. These documents undertook Habitats Regulations Assessment (HRA) of the following internationally designated sites: The Lee Valley Ramsar Site; The Lee Valley SPA; and Epping Forest SAC.

1.1.2 The objective of this assessment is to:

- identify any aspects of the Tottenham Area Action Plan (Publication Version December-January 2015) that would cause an adverse effect on the integrity of Natura 2000 sites, otherwise known as European sites or internationally designated sites (Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and, as a matter of Government policy, Ramsar sites³), either in isolation or in combination with other plans and projects; and
- to advise on appropriate policy mechanisms for delivering mitigation where such effects are identified.

1.2 Current legislation

1.2.1 The need for Habitats Regulations Assessment (HRA) is set out within Article 6 of the EC Habitats Directive 1992, and interpreted into British law by the Conservation of Habitats and Species Regulations 2010. The ultimate aim of the Directive is to “*maintain or restore, at favourable conservation status, natural habitats and species of wild fauna and flora of Community interest*” (Habitats Directive, Article 2(2)). This aim relates to habitats and species, not the internationally designated sites themselves, although the sites have a significant role in delivering favourable conservation status.

1.2.2 Within the UK, Protected Areas for nature conservation include, those established under National legislation (e.g. Sites of Special Scientific Interest (SSSI)), areas established under European Union Directives/European initiatives (including the Natura 2000 network of sites), and protected areas established under Global Agreements (e.g. Ramsar sites).

1.2.3 With relevance to this report, Special Protection Areas (SPAs) are strictly protected sites classified in accordance with Article 4 of the EC Birds Directive 1979. They are classified for rare and vulnerable

¹ Hyder. (2010). London Borough of Haringey Pre-submission Core Strategy Habitats Regulations Assessment. http://www.haringey.gov.uk/sites/haringeygovuk/files/habitats_regulations_assessment.pdf [Accessed 23/09/15]

² AECOM (2015). Habitats Regulations Assessment Screening Report – Alterations to Haringey’s Strategic Policies

AECOM (2015). Habitats Regulations Assessment Screening Report -

³ Wetlands of International Importance designated under the Ramsar Convention 1979

birds (as listed on Annex I of the Directive), and for regularly occurring migratory species. Special Areas of Conservation (SAC) are strictly protected sites designated under Article 3 of the EC Habitats Directive, which requires the establishment of a European network of important high-quality conservation sites that will make a significant contribution to conserving the 189 habitat types and 788 species identified in Annexes I and II of the Directive (as amended)⁴. The listed habitat types and species are those considered to be most in need of conservation at a European level (excluding birds). Ramsar sites are wetlands of international importance designated under the Ramsar Convention.

- 1.2.4 The Conservation of Habitats and Species Regulations 2010 require that land use plans are subject to Appropriate Assessment (AA) where they are likely to have a significant effect on a Natura 2000 site.
- 1.2.5 The Habitats Directive applies the precautionary principle to protected areas; plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. In the case of the Habitats Directive, potentially damaging plans and projects may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation will be necessary to ensure the overall integrity of the site network is maintained.
- 1.2.6 In order to ascertain whether or not site integrity will be affected, a Habitats Regulations Assessment should be undertaken of the plan or project in question:

Habitats Directive 1992

Article 6 (3) states that:

“Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives.”

Conservation of Habitats and Species Regulations 2010 (as amended)

The Regulations state that:

“A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site”.

Figure 1: The Legislative Basis for Appropriate Assessment

- 1.2.7 Over the years the phrase ‘Habitats Regulations Assessment’ has come into wide currency to describe the overall process set out in the Conservation of Habitats and Species Regulations from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an ‘appropriate assessment’. Throughout this report we use the term Habitats Regulations Assessment for the overall process.

1.3 Scope of the Project

- 1.3.1 There is no pre-defined guidance that dictates the physical scope of a HRA of a supporting Local Plan document. Therefore, in considering the physical scope of the assessment, we were guided primarily

⁴ <http://jncc.defra.gov.uk/>

by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Local Plan area boundary; and
- Other sites shown to be linked to development within the Borough boundary through a known 'pathway'.

1.3.2 Briefly defined, pathways are routes by which a change in activity provided within the Alterations to Strategic Policies 2011-2026 document can lead to an effect upon an internationally designated site. In terms of the second category of designated site listed above, guidance from the former Department of Communities and Local Government states that the HRA should be *'proportionate to the geographical scope of the [plan policy]'* and that *'an AA need not be done in any more detail, or using more resources, than is useful for its purpose'* (CLG, 2006, p.6). More recently, the Court of Appeal⁵ ruled that providing the Council (competent authority) was duly satisfied that proposed mitigation could be *'achieved in practice'* to satisfied that the proposed development would have no adverse effect, then this would suffice. This ruling has since been applied to a planning permission (rather than a Core Strategy)⁶. In this case the High Court ruled that for *'a multistage process, so long as there is sufficient information at any particular stage to enable the authority to be satisfied that the proposed mitigation can be achieved in practice it is not necessary for all matters concerning mitigation to be fully resolved before a decision maker is able to conclude that a development will satisfy the requirements of reg 61 of the Habitats Regulations'*.

1.3.3 No Internationally designated sites are located within the London Borough of Haringey's boundary.

1.3.4 The following internationally designated sites considered within the Habitats Regulations Assessment of Haringey's draft DMP are located within 20km of the London Borough of Haringey's authority boundary, and as such could potentially have impact pathways present resulting from the draft DMP:

- Lee Valley SPA and Ramsar site;
- Epping Forest SAC;
- Richmond Park SAC;
- Wimbledon Common SAC; and
- Wormley-Hoddesdonpark Woods SAC.

1.3.5 During an initial sieving exercise to screen out internationally designated sites (e.g. no realistic impact pathways present), the following internationally designated sites can be sieved out from further assessment due to the distances involved.

- Wormley-Hoddesdonpark Woods SAC located 12.9km from the borough boundary;
- Richmond Park SAC located 14.3km from the borough boundary, and;
- Wimbledon Common SAC located 14.7km from the borough boundary.

1.3.6 These sites are not considered further within this document.

1.3.7 There are three internationally designated sites that are located within a sufficiently close distance that the presence of impact pathways linking to Haringey's draft DMP cannot be screened out. These are:

- Lee Valley SPA and Ramsar site, located immediately adjacent to the London Borough to the east; and,
- Epping Forest SAC, located 3km east from London Borough

1.3.8 Details of Lee Valley SPA and Ramsar site and Epping Forest SAC can be found in Appendix A. Appendix B, Figure 1 illustrates the location of the internationally designated site in relation to the London Borough of Haringey's boundary and Areas/ Sites noted within the AAP.

1.3.9 The remainder of this document considers potential for likely significant effects from impact pathways resulting from the Tottenham AAP upon the following internationally designated sites:

- Lee Valley SPA and Ramsar site
- Epping Forest SAC

⁵ No Adastral New Town Ltd (NANT) v Suffolk Coastal District Council Court of Appeal, 17th February 2015

⁶ High Court case of R (Devon Wildlife Trust) v Teignbridge District Council, 28 July 2015

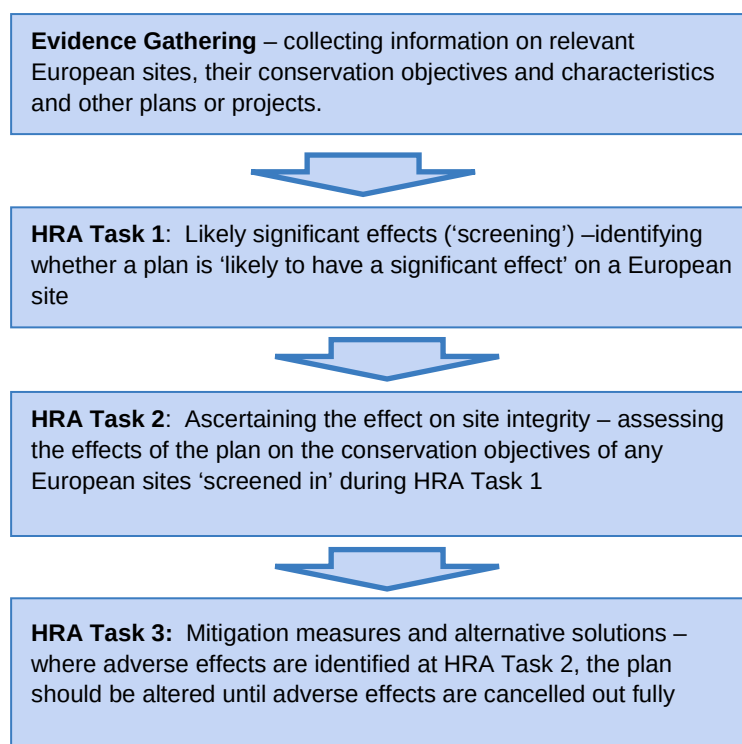
1.4 This Report

- 1.4.1 Section 2 of this report summarises the methodology for the assessment. Section 3 identifies the possible pathways by which adverse effects on European protected sites could arise. Section 4 considers each aspect of the AAP, assessing possible pathways upon internationally designated sites that may be vulnerable and determining likely significant effects. The screening exercise concludes by either screening out any possible impacts or by determining that mitigation or avoidance measures are required. Where mitigation strategies are deemed necessary, potential approaches are discussed. In combination effects with other plans on each internationally designated site are also considered within Section 4. Background information on all the internationally designated sites discussed in this report is presented within Appendix A. Figure 1 of Appendix B presents a map showing all internationally important wildlife sites discussed.

2 Methodology

2.1 Introduction

- 2.1.1 This HRA has been carried out in the continuing absence of formal central Government guidance, although general EC guidance on HRA does exist⁷. The former Department for Communities and Local Government released a consultation paper on the Appropriate Assessment of Plans in 2006⁸. As yet, no further formal guidance has emerged. However, Natural England has produced its own internal guidance⁹ as has the RSPB¹⁰. Both of these have been referred to alongside the guidance outlined in Section 1.2 in undertaking this HRA.
- 2.1.2 Figure 2 below, outlines the stages of HRA according to current draft CLG guidance. The stages are essentially iterative, being revisited as necessary in response to more detailed information, recommendations and any relevant changes to the plan until no significant adverse effects remain.



Source: CLG, 2006

Figure 2- Four-Stage Approach to Habitats Regulations Assessment

2.2 HRA Task 1 - Likely Significant Effects (LSE)

- 2.2.1 Following evidence gathering, the first stage of any Habitats Regulations Assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

- 2.2.2 The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon internationally designated sites, usually

⁷ European Commission (2001): Assessment of plans and projects significantly affecting Natura 2000 Sites: Methodological Guidance on the Provisions of Article 6(3) and 6(4) of the Habitats Directive.

⁸ CLG (2006) Planning for the Protection of European Sites, Consultation Paper

⁹ http://www.ukmpas.org/pdf/practical_guidance/HRGN1.pdf

¹⁰ Dodd A.M., Cleary B.E., Dawkins J.S., Byron H.J., Palframan L.J. and Williams G.M. (2007) *The Appropriate Assessment of Spatial Plans in England: a guide to why, when and how to do it*. The RSPB, Sandy.

because there is no mechanism for an adverse interaction with internationally designated sites. This stage is the subject of Chapter 4 of this report (See Appendix C, Table 1 for the screening table).

- 2.2.3 The level of detail in land use plans concerning developments that will be permitted under the plans will never be sufficient to make a detailed quantification of adverse effects. Therefore, we have again taken a precautionary approach (in the absence of more precise data) assuming as the default position that if an adverse effect cannot be confidently ruled out, avoidance or mitigation measures must be provided. This is in line with the former Department of Communities and Local Government guidance that the level of detail of the assessment, whilst meeting the relevant requirements of the Habitats Regulations, should be 'appropriate' to the level of plan or project that it addresses.

2.3 Confirming Other Plans and Projects That May Act In Combination

- 2.3.1 It is a requirement of the Regulations that the impacts of any land use plan being assessed are not considered in isolation but in combination with other plans and projects that may also be affecting the internationally designated site(s) in question.
- 2.3.2 It is neither practical nor necessary to assess the 'in combination' effects of the Local Plan within the context of all other plans and projects within this area of England. For the purposes of this assessment, we have determined that, due to the nature of the identified impacts, the key other plans and projects relate to the additional housing, transportation and commercial/industrial allocations proposed for neighbouring and nearby authorities over the lifetime of the Local Plan. A good place to start is the London Plan (2015)¹¹
- 2.3.3 In considering the potential for regional housing development on internationally designated sites, the primary consideration for many sites is the impact of visitor numbers – i.e. recreational pressure. Other pathways of impact described in more detail in Chapter 3 include disturbance from construction activities, urbanisation, water quality and water quantity, and air quality. Whilst these are also strongly related to housing provision, the actual geographic impact must also be considered within the context of relevant infrastructure.

Table 1: Housing Levels to be Delivered in Neighbouring Authorities

Local Authority	Total housing (taken from the London Plan, 2015 ¹²) Minimum ten year target 2015-2025	Total housing (taken from the London Plan, 2015) Annual monitoring target 2015-2025
London Borough of Barnet	23,489	2,349
London Borough of Camden	8,892	889
London Borough of Enfield	7,976	798
London Borough of Islington	12,641	1,264
London Borough of Hackney	15,988	1,599
London Borough of Waltham Forest	8,620	862

- 2.3.4 There are other plans and projects that are relevant to the 'in combination' assessment and the following have all been taken into account in this assessment:

Plans

- **London Borough of Haringey Local Plan: Strategic Policies.** Adopted March 2013.
- **London Borough of Haringey Local Plan: Alterations to Strategic Policies.** September 2015 (not yet subject to consultation).
- **London Borough of Haringey Local Plan: Draft Development Management Policies.** September 2015 (not yet subject to consultation).
- **London Borough of Haringey Local Plan: Site Allocations DPD.** September 2015 (not yet subject to consultation).
- **The London Plan.** The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Published March 2015.

¹¹ Mayor of London (March, 2015). The London Plan. The Spatial Development Strategy for London. Consolidated with Alterations Since 2011. Also referred to as Further Alterations to the London Plan (FALP)

¹² Ibid

- **The London Plan.** Sub Regional Development Framework – North London. Published May 2006.
- **The London Plan.** Sub Regional Development Framework – Central London. Published May 2006.
- **North London Waste Plan.** This is currently in preparation; the draft is due for consultation in 'Summer/ Autumn 2015'.
- **London Borough of Barnet Local Plan Core strategy DPD.** Adopted September 2012.
- **London Borough of Camden Core Strategy.** Adopted November 2010.
- **London Borough of Enfield Core Strategy.** Adopted November 2010.
- **London Borough of Islington Core Strategy.** Adopted February 2011.
- **London Borough of Hackney Core Strategy: Local Development framework.** Adopted December 2010.
- **London Borough of Waltham Forest Local Plan Core Strategy.** Adopted March 2012
- **Walthamstow Wetlands.** Planning permission granted 2014.

2.3.5 When undertaking this part of the assessment it is essential to bear in mind the principal intention behind the legislation i.e. to ensure that those projects or plans which in themselves have minor impacts are not simply dismissed on that basis, but are evaluated for any cumulative contribution they may make to an overall significant effect. In practice, in combination assessment is therefore of greatest relevance when the plan would otherwise be screened out because its individual contribution is inconsequential.

3 Pathways of Impact

3.1 Introduction

3.1.1 In carrying out an HRA it is important to determine the various ways in which land use plans can impact on internationally designated sites by following the pathways along which development can be connected with internationally designated sites, in some cases many kilometres distant. Briefly defined, pathways are routes by which a change in activity associated with a development can lead to an effect upon an internationally designated site. Following the HRA of the Local Plan in 2010 and the Alterations to Strategic Policies document and Site Allocations DPD in 2015 and a brief sieve of the AAP, the following impact pathways are considered within this document.

3.1.2 Impact pathways for consideration are:

- Disturbance (from recreational and construction activities)
- Urbanisation
- Atmospheric pollution
- Water abstraction
- Water quality

3.2 Disturbance (from Recreational and Construction Activities)

3.2.1 Recreational use of an internationally designated site and construction activities within close proximity of an internationally designated site have potential to:

- Cause damage through mechanical/ abrasive damage and nutrient enrichment;
- Cause disturbance to sensitive species, particularly ground-nesting birds and wintering wildfowl; and
- Prevent appropriate management or exacerbate existing management difficulties.

Recreational pressure

3.2.2 Different types of internationally designated sites are subject to different types of recreational pressures and have different vulnerabilities. Studies across a range of species have shown that the effects from recreation can be complex.

Mechanical/abrasive damage and nutrient enrichment

3.2.3 Most types of terrestrial internationally designated site can be affected by trampling, which in turn causes soil compaction and erosion. Walkers with dogs contribute to pressure on sites through nutrient enrichment via dog fouling and also have potential to cause greater disturbance to fauna as dogs are less likely to keep to marked footpaths and move more erratically. Motorcycle scrambling and off-road vehicle use can cause serious erosion, as well as disturbance to sensitive species.

3.2.4 There have been several papers published that empirically demonstrate that damage to vegetation in woodlands and other habitats can be caused by vehicles, walkers, horses and cyclists:

- Wilson & Seney (1994)¹³ examined the degree of track erosion caused by hikers, motorcycles, horses and cyclists from 108 plots along tracks in the Gallatin National Forest, Montana. Although the results proved difficult to interpret, it was concluded that horses and hikers disturbed more sediment on wet tracks, and therefore caused more erosion, than motorcycles and bicycles.

¹³ Wilson, J.P. & J.P. Seney. 1994. Erosional impact of hikers, horses, motorcycles and off road bicycles on mountain trails in Montana. *Mountain Research and Development* 14:77-88

- Cole et al (1995a, b)¹⁴ conducted experimental off-track trampling in 18 closed forest, dwarf scrub and meadow and grassland communities (each tramped between 0 – 500 times) over five mountain regions in the US. Vegetation cover was assessed two weeks and one year after trampling, and an inverse relationship with trampling intensity was discovered, although this relationship was weaker after one year than two weeks indicating some recovery of the vegetation. Differences in plant morphological characteristics were found to explain more variation in response between different vegetation types than soil and topographic factors. Low-growing, mat-forming grasses regained their cover best after two weeks and were considered most resistant to trampling, while tall forbs (non-woody vascular plants other than grasses, sedges, rushes and ferns) were considered least resistant. Cover of hemicryptophytes and geophytes (plants with buds below the soil surface) was heavily reduced after two weeks, but had recovered well after one year and as such these were considered most resilient to trampling. Chamaephytes (plants with buds above the soil surface) were least resilient to trampling. It was concluded that these would be the least tolerant of a regular cycle of disturbance.
- Cole (1995c)¹⁵ conducted a follow-up study (in 4 vegetation types) in which shoe type (trainers or walking boots) and trampler weight were varied. Although immediate damage was greater with walking boots, there was no significant difference after one year. Heavier trampers caused a greater reduction in vegetation height than lighter trampers, but there was no difference in effect on cover.
- Cole & Spildie (1998)¹⁶ experimentally compared the effects of off-track trampling by hiker and horse (at two intensities – 25 and 150 passes) in two woodland vegetation types (one with an erect forb understorey and one with a low shrub understorey). Horse traffic was found to cause the largest reduction in vegetation cover. The forb-dominated vegetation suffered greatest disturbance, but recovered rapidly. Higher trampling intensities caused more disturbance.

3.2.5 The total volume of dog faeces deposited on sites can be surprisingly large. For example, at Burnham Beeches National Nature Reserve over one year, Barnard¹⁷ estimated the total amounts of urine and faeces from dogs as 30,000 litres and 60 tonnes respectively. The specific impact on Epping Forest has not been quantified from local studies; however, the fact that habitats for which the SAC is designated appear to be subject already to excessive nitrogen deposition, suggests that any additional source of nutrient enrichment (including uncollected dog faeces) will make a cumulative contribution to overall enrichment. Any such contribution must then be considered within the context of other recreational sources of impact on sites.

Disturbance

3.2.6 Concern regarding the effects of disturbance on birds stems from the fact that they are expending energy unnecessarily and the time they spend responding to disturbance is time that is not spent feeding¹⁸. Disturbance therefore risks increasing energetic output while reducing energetic input, which can adversely affect the 'condition' and ultimately the survival of the birds. In addition, displacement of birds from one feeding site to others can increase the pressure on the resources available within the remaining sites, as they have to sustain a greater number of birds¹⁹.

¹⁴ Cole, D.N. 1995a. Experimental trampling of vegetation. I. Relationship between trampling intensity and vegetation response. *Journal of Applied Ecology* 32: 203-214

Cole, D.N. 1995b. Experimental trampling of vegetation. II. Predictors of resistance and resilience. *Journal of Applied Ecology* 32: 215-224

¹⁵ Cole, D.N. (1995c) Recreational trampling experiments: effects of trampler weight and shoe type. Research Note INT-RN-425. U.S. Forest Service, Intermountain Research Station, Utah

¹⁶ Cole, D.N., Spildie, D.R. (1998) Hiker, horse and llama trampling effects on native vegetation in Montana, USA. *Journal of Environmental Management* 53: 61-71

¹⁷ Barnard, A. (2003) Getting the Facts - Dog Walking and Visitor Number Surveys at Burnham Beeches and their Implications for the Management Process. *Countryside Recreation*, 11, 16 - 19

¹⁸ Riddington, R. et al. 1996. The impact of disturbance on the behaviour and energy budgets of Brent geese. *Bird Study* 43:269-279

¹⁹ Gill, J.A., Sutherland, W.J. & Norris, K. 1998. The consequences of human disturbance for estuarine birds. *RSPB Conservation Review* 12: 67-72

- 3.2.7 The potential for disturbance may be less in winter than in summer, in that there are often a smaller number of recreational users. In addition, the consequences of disturbance at a population level may be reduced because birds are not breeding. However, winter activity can still cause important disturbance, especially as birds are particularly vulnerable at this time of year due to food shortages, such that disturbance which results in abandonment of suitable feeding areas through disturbance can have severe consequences. Several empirical studies have, through correlative analysis, demonstrated that out-of-season (October-March) recreational activity can result in quantifiable disturbance:
- Underhill et al²⁰ counted waterfowl and all disturbance events on 54 water bodies within the South West London Water bodies Special Protection Area and clearly correlated disturbance with a decrease in bird numbers at weekends in smaller sites and with the movement of birds within larger sites from disturbed to less disturbed areas.
 - Evans & Warrington²¹ found that on Sundays total water bird numbers (including shoveler and gadwall) were 19% higher on Stocker's Lake LNR in Hertfordshire, and attributed this to displacement of birds resulting from greater recreational activity on surrounding water bodies at weekends relative to week days.
 - Tuite et al²² used a large (379 site), long-term (10-year) dataset (September – March species counts) to correlate seasonal changes in wildfowl abundance with the presence of various recreational activities. They found that on inland water bodies shoveler was one of the most sensitive species to disturbance. The greatest impact on winter wildfowl numbers was associated with sailing/windsurfing and rowing.
 - Pease et al²³ investigated the responses of seven species of dabbling ducks to a range of potential causes of disturbance, ranging from pedestrians to vehicle movements. They determined that walking and biking created greater disturbance than vehicles and that gadwall were among the most sensitive of the species studied.
 - In a three-year study of wetland birds at the Stour and Orwell SPA, Ravenscroft²⁴ found that walkers, boats and dogs were the most regular source of disturbance. Despite this, the greatest responses came from relatively infrequent events, such as gun shots and aircraft noise. Birds seemed to habituate to frequent 'benign' events such as vehicles, sailing and horses, but there was evidence that apparent habituation to more disruptive events related to reduced bird numbers – i.e. birds were avoiding the most frequently disturbed areas. Disturbance was greatest at high tide and on the Orwell, but birds on the Stour showed greatest sensitivity.
- 3.2.8 A number of studies have shown that birds are affected more by dogs and people with dogs than by people alone, with birds flushing more readily, more frequently, at greater distances and for longer. In addition, dogs, rather than people, tend to be the cause of many management difficulties, notably by worrying grazing animals, and can cause eutrophication near paths. Nutrient-poor habitats such as heathland are particularly sensitive to the fertilising effect of inputs of phosphates, nitrogen and potassium from dog faeces²⁵.
- 3.2.9 Underhill-Day²⁶ summarises the results of visitor studies that have collected data on the use of semi-natural habitat by dogs. In surveys where 100 observations or more were reported, the mean percentage of visitors who were accompanied by dogs was 54.0%.
- 3.2.10 However the outcomes of many of these studies need to be treated with care. For instance, the effect of disturbance is not necessarily correlated with the impact of disturbance, i.e. the most easily disturbed species are not necessarily those that will suffer the greatest impacts. It has been shown that, in some cases, the most easily disturbed birds simply move to other feeding sites, whilst others may remain (possibly due to an absence of alternative sites) and thus suffer greater impacts on their

²⁰ Underhill, M.C. et al. 1993. Use of Waterbodies in South West London by Waterfowl. An Investigation of the Factors Affecting Distribution, Abundance and Community Structure. Report to Thames Water Utilities Ltd. and English Nature. Wetlands Advisory Service, Slimbridge

²¹ Evans, D.M. & Warrington, S. 1997. The effects of recreational disturbance on wintering waterbirds on a mature gravel pit lake near London. *International Journal of Environmental Studies* 53: 167-182

²² Tuite, C.H., Hanson, P.R. & Owen, M. 1984. Some ecological factors affecting winter wildfowl distribution on inland waters in England and Wales and the influence of water-based recreation. *Journal of Applied Ecology* 21: 41-62

²³ Pease, M.L., Rose, R.K. & Butler, M.J. 2005. Effects of human disturbances on the behavior of wintering ducks. *Wildlife Society Bulletin* 33 (1): 103-112.

²⁴ Ravenscroft, N. (2005) Pilot study into disturbance of waders and wildfowl on the Stour-Orwell SPA: analysis of 2004/05 data. Era report 44, Report to Suffolk Coast & Heaths Unit.

population²⁷. A literature review undertaken for the RSPB²⁸ also urges caution when extrapolating the results of one disturbance study because responses differ between species and the response of one species may differ according to local environmental conditions. These facts have to be taken into account when attempting to predict the impacts of future recreational pressure on internationally designated sites.

- 3.2.11 Disturbing activities are on a continuum. The most disturbing activities are likely to be those that involve irregular, infrequent, unpredictable loud noise events, movement or vibration of long duration (such as those often associated with construction activities). Birds are least likely to be disturbed by activities that involve regular, frequent, predictable, quiet patterns of sound or movement or minimal vibration. The further any activity is from the birds, the less likely it is to result in disturbance.
- 3.2.12 The factors that influence a species response to a disturbance are numerous, but the three key factors are species sensitivity, proximity of disturbance sources and timing/duration of the potentially disturbing activity.
- 3.2.13 It should be emphasised that recreational use is not inevitably a problem. Many internationally designated sites are also nature reserves managed for conservation and public appreciation of nature. The Lee Valley Regional Park that encompasses the SPA and Ramsar sites is such an example. At these sites, access is encouraged and resources are available to ensure that recreational use is managed appropriately.
- 3.2.14 Where increased recreational use is predicted to cause adverse impacts on a site, avoidance and mitigation should be considered. Avoidance of recreational impacts at internationally designated sites involves location of new development away from such sites; Local Development Frameworks (and other strategic plans) provide the mechanism for this. Where avoidance is not possible, mitigation will usually involve a mix of access management, habitat management and provision of alternative recreational space.
- Access management – restricting access to some or all of a internationally designated site - is not usually within the remit of the Council and restriction of access may contravene a range of Government policies on access to open space, and Government objectives for increasing exercise, improving health etc. However, active management of access may be possible, for example as practised on nature reserves.
 - Habitat management is not within the direct remit of the Council. However the Council can help to set a framework for improved habitat management by promoting cross-authority collaboration and S106 funding of habitat management. Provision of alternative recreational space can help to attract recreational users away from sensitive internationally designated sites, and reduce pressure on the sites. For example, some species for which internationally designated sites have been designated are particularly sensitive to dogs, and many dog walkers may be happy to be diverted to other, less sensitive, sites. However the location and type of alternative space must be attractive for users to be effective. In the case of both Epping Forest and Lee Valley SPA and Ramsar sites, dog-walking, walking and cycling are likely to be the major site usages, and so alternative space needs to cater for this.

²⁵ Shaw, P.J.A., K. Lankey and S.A. Hollingham (1995) – Impacts of trampling and dog fouling on vegetation and soil conditions on Headley Heath. *The London Naturalist*, **74**, 77-82.

²⁶ Underhill-Day, J.C. (2005). A literature review of urban effects on lowland heaths and their wildlife. Natural England Research Report 623.

²⁷ Gill et al. (2001) - Why behavioural responses may not reflect the population consequences of human disturbance. *Biological Conservation*, **97**, 265-268

²⁸ Woodfield & Langston (2004) - Literature review on the impact on bird population of disturbance due to human access on foot. *RSPB research report* No. 9.

- 3.2.15 The Lee Valley SPA and Ramsar site lies immediately adjacent to the London Borough of Haringey and Epping Forest SAC is located 3km from the Borough, as such they are theoretically vulnerable, to the effects of recreational pressure and/ or disturbances from construction activities resulting from development within Haringey.
- 3.2.16 It is therefore necessary to perform an initial screening exercise to determine if the Tottenham AAP document contains policy measures that could lead to a likely significant effects, either alone or 'in combination' with other plans and projects, through recreational pressure, on these internationally designated sites.

3.3 Urbanisation

- 3.3.1 This impact is closely related to recreational pressure, in that they both result from increased populations within close proximity to sensitive sites. Urbanisation is considered separately as the detail of the impacts is distinct from the trampling, disturbance and dog-fouling that results specifically from recreational activity. The list of urbanisation impacts can be extensive, but core impacts can be singled out:
- Increased fly-tipping - Rubbish tipping is unsightly but the principle adverse ecological effect of tipping is the introduction of invasive non-native species with garden waste. Non-native species can in some situations, lead to negative interactions with habitats or species for which internationally designated sites may be designated. Garden waste results in the introduction of invasive non-native species precisely because it is the 'troublesome and over-exuberant' garden plants that are typically thrown out²⁹. Non-native species may also be introduced deliberately or may be bird-sown from local gardens.
 - Cat predation - A survey performed in 1997 indicated that nine million British cats brought home 92 million prey items over a five-month period³⁰. A large proportion of domestic cats are found in urban situations, and increasing urbanisation is likely to lead to increased cat predation
- 3.3.2 The most detailed consideration of the link between relative proximity of development to internationally designated sites and damage to interest features has been carried out with regard to the Thames Basin Heaths SPA.
- 3.3.3 After extensive research, Natural England and its partners produced a 'Delivery Plan' which made recommendations for accommodating development while also protecting the interest features of the internationally designated site. This included the recommendation of implementing a series of zones within which varying constraints would be placed upon development. While the zones relating to recreational pressure expanded to 5km (as this was determined from visitor surveys to be the principal recreational catchment for this internationally designated site), that concerning other aspects of urbanisation (particularly predation of the chicks of ground-nesting birds by domestic cats) was determined at 400m from the SPA boundary. The delivery plan concluded that the adverse effects of any development located within 400m of the SPA boundary could not be mitigated since this was the range over which cats could be expected to roam as a matter of routine and there was no realistic way of restricting their movements, and as such, no new housing should be located within this zone.
- 3.3.4 As such, screening is undertaken to determine whether Haringey's Alterations to Strategic Policies document contains policy measures that could lead to likely significant effects upon Lee Valley internationally designated site, either alone or 'in combination' with other plans and projects, through impacts of urbanisation.

3.4 Atmospheric Pollution

- 3.4.1 The main pollutants of concern for internationally designated sites are oxides of nitrogen (NOx), ammonia (NH₃) and sulphur dioxide (SO₂). NOx can have a directly toxic effect upon vegetation. In addition, greater NOx or ammonia concentrations within the atmosphere will lead to greater rates of nitrogen deposition to soils. An increase in the deposition of nitrogen from the atmosphere to soils is generally regarded to lead to an increase in soil fertility, which can have a serious deleterious effect on the quality of semi-natural, nitrogen-limited terrestrial habitats.

²⁹ Gilbert, O. & Bevan, D. 1997. The effect of urbanisation on ancient woodlands. *British Wildlife* 8: 213-218.

³⁰ Woods, M. et al. 2003. Predation of wildlife by domestic cats *Felis catus* in Great Britain. *Mammal Review* 33, 2 174-188

Local air pollution

- 3.4.2 According to the Department of Transport's Transport Analysis Guidance, "Beyond 200m, the contribution of vehicle emissions from the roadside to local pollution levels is not significant"³¹. This is therefore the distance that has been used throughout this HRA in order to determine whether internationally designated sites are likely to be significantly affected by development under the Local Plan.

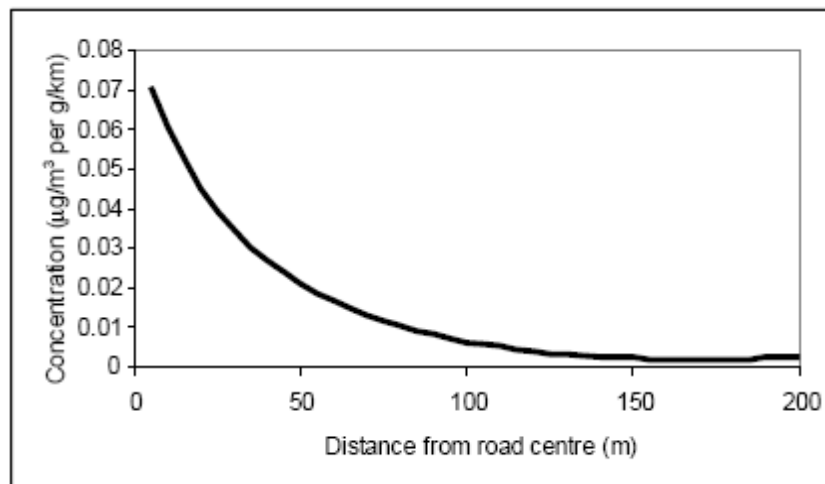


Figure 3: Traffic Contribution to Concentrations of Pollutants at Different Distances from a Road (Source: Dft)

- 3.4.3 Lee Valley internationally designated site lies within 200m of two major roads (A503 and A1055) that are likely to be regularly used by vehicle journeys within the Borough as a result of the increased population, and potentially other development plans. As such, it can be concluded that air quality should be included within the scope of this assessment. The location of these roads in relation to the internationally designated sites is illustrated in Appendix B, Figure 1.

Table 2: Major Roads Within 200m of Lee Valley SPA and Ramsar site

Road	Proximity to Lee Valley SPA and Ramsar site
A503	The A503 bisects the designated site. The A503 is adjacent to Low Maynard and High Maynard Reservoir (located north of the road), and 10m from Reservoir No. 4, and 70m of Reservoir No. 2 (located south of the road) for a distance of approximately 470m.
A1055	The A1055 is located west of the internationally designated site. At its closest the road is located 180m from the site.

- 3.4.4 Whilst Epping Forest SAC is located within 200m of major roads, due to the convoluted routes for traffic from Haringey to take to Epping Forest SAC, it is unlikely that links exist between the Haringey DMP and Epping Forest SAC via the an air quality impact pathway. Air quality in relation to Epping Forest SAC is not discussed further.

³¹ <http://www.dft.gov.uk/webtag/documents/expert/unit3.3.3.php#013>; accessed 13/04/12

Table 3: Critical Loads of SPA and Ramsar Features and Existing Nitrogen Deposition Rates Upon Features.

If highlighted in red, the feature is already in exceedance of its Critical Load. If hi-lighted in orange, the feature is within its Critical Load limits. If hi-lighted in green, the feature is not below Critical Load limits.

Site	Site Feature	Critical Load (kg N/ha/yr) ³²	Average current levels of N deposition (kg N/ha/yr) ³³
Lee Valley SPA	Wintering bittern	15-30 (Critical load class: rich fen)	16.28 ³⁴
	Migratory gadwall	(Standing open water) No comparable habitat with established critical load estimate available.	No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site specific level. Furthermore, consideration should also be given to other sources of N, i.e. discharges to water, diffuse agricultural pollution etc.
	Migratory shoveler		
Lee Valley Ramsar	Whorled water-milfoil	3-10 (Critical Load Class: standing open water and canals: mesotrophic standing waters)	16.28
	Waterboatman <i>Micronecta minutissima</i>	(Standing open water) No comparable habitat with established critical load estimate available.	No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often P limited (or N/P co-limiting), therefore decisions should be taken at a site specific level. Furthermore, consideration should also be given to other sources of N, i.e. discharges to water, diffuse agricultural pollution etc.
	Northern shoveler		
	Gadwall		

3.5 Water abstraction

- 3.5.1 London is generally an area of high water stress. Development within the London Borough of Haringey (and therefore Tottenham) will increase water demand.
- 3.5.2 Haringey lies within Thames Water's supply area, specifically their London Resource Zone. Approximately 80% of London's water supplies come from surface water of the rivers Thames and Lee via reservoirs, and 20% from groundwater sources situated beneath the London Boroughs from the confined chalk aquifer³⁵. Water supply for Thames Water's London Resource Zone does involve some abstraction from the Lee Valley Reservoirs (including Walthamstow Reservoirs), which are also subject to an agreement to (if necessary) supply Essex and Suffolk Water with up to 91Ml/day average bulk transfer. Negotiations are currently being undertaken to reduce this transfer quantity to

³² www.APIS.ac.uk [accessed 13/10/15]

³³ www.APIS.ac.uk [accessed 13/10/15]

³⁴ This is an average from 5km grid squares that cover the designated site. As such, these levels do not necessarily reflect exact levels within the parts of the SPA and Ramsar sites where the bittern and whorled water-milfoil are found.

³⁵ Thames Water. (2015) Thames Water Final Water Resources Management Plan 2015 – 2040
http://www.thameswater.co.uk/wrmp/Section_0.pdf [Accessed 16/10/15]

Essex and Suffolk Water to no less than 60 Ml/d in the period January to March and 75 Ml/d for the remainder of the year. The bulk supply is provided from the King George and William Girling Reservoirs (these reservoirs are not located within the Lee Valley internationally designated site, but are likely to be linked to the reservoirs within the designated site) in the Lee Valley, potentially supported by abstraction directly from the River Lee at defined intakes, if required.

- 3.5.3 Within the London Catchment Abstraction Management Strategy document³⁶, the Environment Agency identifies that within AP8 (the section of the River Lee between Enfield Lock to the north and the Tidal Thames to the south) *'New consumptive surface water abstractions in the Lower Lee catchment will be considered only at times of very high flows. Abstraction at very high flows will not provide a reliable source of water as they may not occur every year. Applicants may need to invest in a water storage reservoir to store water when it's available. Abstractions that are considered to be non-consumptive or small scale consumptive licences that result in an overall net benefit to the water environment may be considered beyond the stated restrictions, subject to a local impact assessment.'*
- 3.5.4 With no other schemes in place, increased residential and employment development as a result of Haringey's Alteration to Strategic Policies document could lead to a need for damaging levels of abstraction from the Lee Valley SPA/Ramsar when considered cumulatively with all other new development in the London WRZ and further north in Hertfordshire that would ordinarily entail water supply from the Lee Valley. However, Thames Water have implemented a major water supply project in London which involves abstraction and desalination of water from the tidal River Thames (the Thames Gateway Water Treatment Plant), such that damaging levels of abstraction from the River Lee to supply the London Borough of Haringey or other parts of London should be avoidable. The Revised Draft Water Resources Management Plan for the London area³⁷ determined that if no action was taken, then the London WRZ supply demand balance would be in deficit of between 55.4ML/d by 2015 and up to 291.7ML/d by 2030. This was taking into account housing forecasts from then existing Local Plan documents at that time. Thames Water proposes to address this imbalance through a number of changes. These are: demand management, leakage reduction, a new raw water trading agreement with RWE N Power in 2015 and small ground water schemes. Ultimately it is the Environment Agency that is the competent authority that determines licences for abstraction, thus it is not the responsibility of the Council to determine if levels of water abstraction will not lead to likely significant effects. The HRA for the 2013 London Plan³⁸ deferred screening of impacts resulting from the provision of increased housing within the Plan period to 'lower tier HRAs', placing the responsibility at a lower level, such as a Borough level.
- 3.5.5 The London Borough of Haringey Council has been consulting with Thames Water regarding the issue of water supply. It is understood that there is no suggestion that the total quantum of development proposed within Haringey's combined Alterations to Strategic Policies document and the adopted Local Plan cannot be accommodated within existing provisions, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey's Infrastructure Delivery Plan. As such, it can be determined that no likely significant effects upon the Lee Valley SPA and Ramsar site will result as a consequence of Haringey's Alterations to Strategic Policies document. This is not discussed further within this document.

3.6 Water quality

- 3.6.1 Wastewater from Haringey is processed in Sewage Treatment Works (STWs). Discharges from STWs into watercourses such as Salmons Brook and the River Lee have potential to impact upon the Lee Valley SPA and Ramsar site. STWs that treat water from the London Borough of Haringey include Deephams STW and Beckton STW. These have both recently been subject to major improvement schemes by Thames Water to increase their capacities. Thames Water are undertaking a range of works across London to improve its sewage treatment network, increasing its capacity and improving the water quality within waterways such as the River Lee and the River Thames.

³⁶ Environment Agency. (2013) London Abstraction Licencing Strategy
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/289888/LIT_2545_705985.pdf [Accessed 16/10/15]

³⁷ Ibid.

³⁸ Mayor of London (October, 2009). Habitats Regulations Assessment Screening Report. Consultation draft replacement London Plan (Spatial Development Strategy for Greater London).
<https://www.london.gov.uk/sites/default/files/archives/uploads-hra-final-report-oct09.pdf> [Accessed 20/10/15]

- 3.6.2 Deephams STW: Planning Permission has been granted for the upgrade to the Deephams STW within the London Borough of Enfield, for completion in 2018. The planned upgrade will help increase capacity and improve water quality³⁹ within Salmons Brook (where water is discharged into) and the River Lee (Salmons Brook flows into the River Lee). These improvement works will enable Thames Water to treat greater quantities of wastewater to a higher standard than is currently the case.
- 3.6.3 Beckton STW: This is being expanded by '60 per cent to enable it to deal with the increased volumes of sewage and allow for a ten per cent population increase until 2021 so it can:
- *Fully treat increased flows during heavy rainfall, which currently discharge into the River Thames when the site becomes overloaded to prevent streets and homes from flooding.*
 - *Treat additional storm flows from the Lee Tunnel, a new four-mile sewer which will capture storm sewage that currently overflows into the River Lee when the sewerage system gets overwhelmed during heavy rainfall.*
 - *Accommodate additional flows from the proposed Thames Tideway Tunnel.'*⁴⁰
- 3.6.4 Beckton STW discharges in the tidal stretches of the River Thames, located downstream from the River Lee SPA and Ramsar site. As such, there are no impact discharge pathways present to the River Lee SPA and Ramsar site.⁴¹ A pathway does exist, in the sense that this project will reduce sewerage outflows into the River Lee, thus improving water quality within the River Lee. This is a positive impact pathway that will not result in detrimental likely significant effects upon the Lee Valley SPA and Ramsar site.
- 3.6.5 Lee Tunnel: The Lee Tunnel is currently under construction. It will tackle discharges from London's largest Combined Sewerage Overflow (CSO) at Abbey Mills Pumping Station in Stratford, which accounts for 40 per cent of the total discharge. It will help prevent more than 16 million tonnes of sewage mixed with rainwater overflowing into the River Lee each year, by capturing it and transferring it to Beckton Sewage Treatment Works⁴². This is expected to be operational by the end of 2015. A pathway does exist, in the sense that this project will reduce sewerage outflows into the River Lee, thus improving water quality within the River Lee. This is a positive impact pathway that will not result in detrimental likely significant effects upon the Lee Valley SPA and Ramsar site.
- 3.6.6 Thames Tideway Tunnel: It is planned that construction works will commence in 2016. The tunnel will be a sewer the width of three London buses, which will run up to 20 miles from west to east London. It is designed to reduce the amount of raw sewage overflow into the Thames (currently this happens up to 60 times a year). *'The Thames Tideway Tunnel will deal with this problem for at least the next 100 years. It will connect up to the 34 most polluting sewer overflows, as identified by the Environment Agency, to capture sewage which would otherwise spill into the river Thames, before transferring it to our Beckton sewage works to be treated.'*⁴³ Ultimately, this project will improve water quality of the River Thames, downstream of the Lee Valley SPA and Ramsar site. This project does not contain impact pathways that link with the Lee Valley SPA and Ramsar site.

³⁹ Thames Water. (2015). Planning Permission Granted. <http://www.thameswater.co.uk/deephams/16659.htm> [Accessed 19/10/15]

Thames Water. (2014). A630 Deepham Sewage Works Upgrade. Project Overview report. Phase 2 Public Consultation Version.

⁴⁰ Thames Water. (2015). Sewage Works upgrades: Beckton Sewage treatment Works <http://www.thameswater.co.uk/about-us/10098.htm> [Accessed 19/10/15]

⁴¹ According to the Environment Agency's Stage 3 Appropriate Assessment for the Thames Estuary and Marshes SPA/Ramsar site, that lies downstream from Beckton, current consented discharges do not have a significant adverse impact upon the Thames Estuary & Marshes SPA, with the exception of slightly elevated levels of elemental copper (Cu) derived from pipes at Reading and Slough. Moreover, development within Haringey will take place at a time when a range of water quality improvements to the Thames Tideway as a whole will be implemented through various Thames Water/Environment Agency schemes including the interception and storage of wastewater from a large number of Combined Sewer Overflows (CSO's) in London and expansions to the treatment capacity of Thames Water's Sewage treatment Works, including at Beckton which will enable them to treat greater quantities of wastewater to a higher standard than is currently the case. As such, the overall water quality of the River Thames should actually improve over the delivery period.

⁴² Thames Water. (2015). Lee Tunnel. <http://www.thameswater.co.uk/about-us/10113.htm> [Accessed 19/10/15]

⁴³ Thames Water. (2015). Thames Tideway Tunnel. <http://www.thameswater.co.uk/about-us/10115.htm> [Accessed 19/10/15]

- 3.6.7 In conclusion, the Deephams STW, Beckton STW and Lee Tunnel will all result in improvements to water quality downstream of these STWs within the River Lee and thus the Lee Valley SPA and Ramsar site. These works have been designed to cope with future increases in sewage resulting from future increases in sewage output.
- 3.6.8 The provision for the increases in housing supply of 19,802 net new dwellings through to the end of Haringey's Plan period (2026) (including a minimum 10,000 identified within the Tottenham AAP) and an increase in Local Employment Areas outlined within Haringey's Alterations to Strategic policies document and the Tottenham AAP, have potential to increase the sewage output from within the Tottenham. The projects noted above will improve the capacity of the STWs and improve the quality of the water discharged. However, no data is available to determine exact capacities.
- 3.6.9 As noted in the previous section, the HRA for the 2013 London Plan⁴⁴ deferred screening of impacts from increased sewage resulting from the provision of increased housing within the AAP to 'lower tier HRAs', placing the responsibility at a lower level, such as a Borough level. The London Borough of Haringey Council has been in discussions with Thames Water regarding the issue of dealing with waste water. It is understood that there is no suggestion that the total quantum of development proposed within Haringey's combined Alterations to Strategic Policies (which includes the quantum of development identified within Tottenham AAP) document and the adopted Local Plan cannot be accommodated within existing provisions, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey's Infrastructure Delivery Plan. As such, it can be determined that no likely significant effects upon the Lee Valley SPA and Ramsar site will result as a consequence the Tottenham AAP. This is not discussed further within this document.

Location specific site runoff

- 3.6.10 The Walthamstow Reservoirs portion of the Lee Valley SPA and Ramsar site lies in close proximity to the A503, and therefore there is potential for point source pollution events to arise from accidental spillages from increases in the number of vehicles on this route resulting from the Tottenham AAP. In reality the implementation by transport operators of measures to avoid point source pollution is not the responsibility of the Council, and it is also likely that the levels of development promoted within the Plan will lead to a minimal increase in risk of such events occurring, given that the likelihood of a catastrophic spillage event may already be considered low. The River Lee and River Lee Navigation separate the reservoirs from most development identified within the Tottenham AAP, and do not in themselves form a part of the SPA or Ramsar within Haringey, whilst it is noted that these will be connected to the reservoirs of the SPA and Ramsar site. Standard construction methodologies and standard operational phase requirements include provisions to ensure no runoff leaves the site.
- 3.6.11 In conclusion, no internationally designated sites are susceptible to reduced water quality through STW discharges or direct run-off arising from development within the Tottenham AAP, and therefore such considerations are not considered further within this HRA.

⁴⁴ Ibid

4 Screening Assessment

4.1.1 As a first step, an initial screening exercise was undertaken in order to identify any Policies within the AAP that required more detailed screening and discussion. This exercise is set out in Appendix C Table 1. The initial screening of Tottenham AAP policies identified policies that contain a potential linking pathway that could result in a likely significant effect upon Lee Valley SPA and Ramsar site and/ or Epping Forest SAC. Where pathways have already been considered and screened out for all development cumulatively across Haringey (i.e. in the HRA of the Alterations of Strategic Policies) they are not listed below. Rather, this assessment focusses on potential for site-specific effects from individual development sites. The following policies within Tottenham AAP document have potential to result in likely significant effects upon the internationally designated sites and are therefore subject to a more detailed discussion of likely significant effects in this chapter:

- AAP4: Employment
- AAP11: Infrastructure
- TH1: District Centre in Tottenham Hale
- TH8: Hale Village
- TH9: Hale Wharf
- NT3: Northumberland Park North
- NT4: Northumberland Park

4.1.2 These policies identify specific sites located within relatively close proximity to the Lee Valley SPA/Ramsar site within Tottenham.

4.1.3 Impact pathways upon Epping Forest SAC considered further include:

- Disturbance (from recreational and construction activities);

4.1.4 Impact pathways upon Lee Valley SPA and Ramsar site considered further include:

- Urbanisation;
- Disturbance (from recreational and construction activities);
- Air quality;
- Water abstraction; and
- Water quality.

4.2 Disturbance (from Recreational and Construction Activities)

Recreational activities

4.2.1 AAP3: Housing provides for 10,000 net new dwellings to the end of the Plan period (2026). At the higher tier, the HRA for Haringey's adopted Strategic Policies document⁴⁵ and Alterations to Strategic Policies document determined no likely significant effects upon either Lee Valley SPA and Ramsar site and Epping Forest SAC resulting from an increase in recreational pressure resulting from the 19,802 net new dwellings provided for within the policies.

4.2.2 There are no other potential impact pathways present between Epping Forest SAC and the Tottenham AAP. This internationally designated site can be screened out from further assessment.

Construction Activities

4.2.3 Disturbances from construction activities such as noise and visual disturbances have potential to result in likely significant effects upon internationally designated sites such as the Lee Valley SPA and Ramsar site features (wintering bittern, and migratory gadwall and shoveler).

4.2.4 Tottenham AAP includes for the provision of development within close proximity to the Lee Valley internationally designated site, including various sites mentioned in Policy AAP4 (Employment), TH8: (Hale Village), TH9: (Hale Wharf), NT3: (Northumberland Park North), and NT4: (Northumberland Park), the closest being located within 30m of the designated site (see Figure 1 for locations).

⁴⁵ Ibid

- 4.2.5 Lee Valley internationally designated site is located within an urban area so will already be subject to existing levels of visual disturbance and noise and vibrations. However, impacts from construction and operational activities in close proximity to the designated site still have potential to impact upon the site's features.
- 4.2.6 AAP6 (Urban Design and Character including Tall Buildings), provides for protection from likely significant effects upon the Lee Valley sites as follows:
- 4.2.7 AAP6: *I 'Where proposals fall within 500m of a Special Protection Area/ RAMSAR areas, specific measures should be set out to ensure there is no adverse effect on ecological integrity. Applicants are encouraged to engage with Natural England during pre-application discussions.'*
- 4.2.8 This hook policy (AAP6) provides protection for the Lee Valley sites from development and given the development background it is very likely that any proposed development site can be delivered in such a way that adverse noise impacts do not take place on the SPA/Ramsar site, given the existing background levels and with specific mitigation as needed following pre-application discussions. As such, this impact pathway can be screened out as the AAP provides an adequate policy framework to protect the SPA/Ramsar site.

In-combination with other projects and plans

- 4.2.9 As detailed above, access to the Walthamstow reservoirs is by key-holder only, and access is controlled by a permit basis, so the exposure of the reservoirs to human activity is very limited, and is managed. As a result, it can be concluded that recreational disturbance will not result in a likely significant effect alone or in-combination with other projects or plans.

4.3 Urbanisation

- 4.3.1 This impact is closely related to recreational pressure, in that urbanisation and recreational pressure both result from increased populations (including industrial and employment sites) within close proximity to sensitive sites. As such, Epping Forest SAC (located 3km from the London Borough of Haringey) is not linked to this impact pathway resulting from the Tottenham AAP.
- 4.3.2 Given that the Lee Valley SPA and Ramsar sites lie immediately adjacent to Tottenham, it is theoretically vulnerable, from a geographic perspective, to the effects of urbanisation from development within Tottenham. Lee Valley SPA and Ramsar site is ecologically vulnerable, (via direct habitat degradation). However, it is unlikely that the SPA and Ramsar site's designated features would be directly vulnerable to urbanisation impacts, as they are species that favour aquatic environments. In addition, the features are unlikely to suffer from significant cat predation or fly tipping as the River Lee (River Lea) and River Lee Navigation flows along the eastern extent of Tottenham, between Tottenham and Lee Valley SPA and Ramsar acting as a barrier to the dispersal of cats from Haringey. In addition to this, Waltham Wetlands project will provide for greater public access to the site via a small network of routes. However, this will be restricted by walkways and vegetation planting. The project will not provide for increased vehicular access by the public within the designated site, thus reducing the likelihood of activities such as fly-tipping within the designated site. As such, this impact pathway can be screened out.

In-combination with other projects and plans

- 4.3.3 As noted above, the Waltham Reservoirs are separated from Tottenham by the presence of the River Lee, and River Lee Navigation. The eastern boundary of the reservoirs is separated from the London Borough of Walthamstow by the Lee Flood Relief Channel, which also prevents urbanisation impacting upon the Lee Valley designated sites. As such, likely significant effects both alone and in-combination with other projects and plans can be screened out.

4.4 Atmospheric pollution

- 4.4.1 Changes in air quality will occur wherever 'affected roads' are identified and increases in airborne pollutants from car exhausts and construction activities are possible. Effects of these increases are limited to areas within 200m of the road (DMRB, Volume 11⁴⁶). The Air Pollution Information System (APIS) website provides details of critical loads of atmospheric pollution which if exceeded could lead to habitat damage. At this stage it is worth noting that both the breeding bittern (SPA feature) and the

⁴⁶ Design Manual for Roads and Bridges Volume 11 Section 3 part 1 air quality – procedure for assessing impacts.

whorled water-milfoil (Ramsar feature) are not present within the Walthamstow reservoirs parcel of the Lee Valley internationally designated sites (as identified within SSSI citations). These two species are present within the northern parcel of the Lee Valley internationally designated sites, associated with the Turnford and Cheshunt Pits SSSI located approximately 9.5km north (in a straight line) from the London Borough of Haringey. As such, due to the distance involved, the air quality impact pathway to these vulnerable features cannot be linked to Haringey's Alterations to Strategic policies document and no likely significant effects will arise.

- 4.4.2 No critical loads are provided for the habitat 'open standing water' (water boatman, shoveler and gadwall features rely upon this habitat) to allow for an assessment. The APIS website states that '*No Critical Load has been assigned to the EUNIS classes for meso/eutrophic systems. These systems are often phosphorus limited; therefore decisions should be taken at a site specific level*'. In this case, no likely significant effects are anticipated since the Walthamstow reservoirs associated with the Lee Valley SPA and Ramsar site, like most freshwater environments, are essentially phosphate limited, rather than nitrogen limited, meaning that it is phosphate availability that controls the growth of macrophytes and algae. The main source of phosphates is from wastewater, agriculture and mining. As such, these features (the water boatman, gadwall and shoveler) are not sensitive to pathways linked to air quality and there is no potential for likely significant effects to arise as a result of Haringey's Alterations to Strategic Policies document.
- 4.4.3 Further to this, transport modelling has been undertaken by the Council for the preparation of the Tottenham Area Action Plan (AAP). It is acknowledged that the numbers in the table are only AM peak flows so it is not possible to calculate AADT. However, the figures provided take into account all expected growth (not just that provided within the Tottenham AAP) and does provide a broad indication of whether flows are likely to go up or down as a result of the AAP and if so, to what degree. Tottenham is located adjacent to the SPA and Ramsar site. Results of the Transport modelling are illustrated in Table 4.

Table 4: Change in AM peak hour [08.00 – 09.00]

Road section	Do minimum	Do something	Change	% change
Ferry Lane (A503)	2100	1700	-400	-19
Watermead Way (A1055)	2280	1920	-360	-16
High Road, south Tottenham (A10)	2160	2230	+70	+3
Tottenham High Road	3130	2970	-160	-5

- 4.4.4 Table 4 illustrates that, taking into account all expected growth within Haringey and the surrounding authorities, AM peak flows will decrease by 19% on the A503 (the road that passes through the SPA and Ramsar site) over the plan period. Similarly, a 16% decrease is expected on the A1055 (the road located within 200m of the SPA and Ramsar site). The traffic modelling indicates that rather than resulting in a net increase in traffic flows along these sensitive roads (A503 and A1055); and hence reduced air quality, development over the plan period will in fact result in a decrease in transport flows along these sensitive routes in close proximity to the Lee Valley SPA and Ramsar site, and has potential to improve air quality along these sensitive transport routes.

In-combination with other projects and plans

- 4.4.5 As noted above, features that have potential to be sensitive to increases in air pollution are not present within the Waltham Reservoirs portion of the Lee Valley SPA and Ramsar site. As such, there are no impact pathways present that will act alone or in combination, resulting in likely significant effects upon the Lee Valley SPA and Ramsar site. As such, this impact pathway can be screened out.

5 Conclusion

- 5.1.1 It can be concluded that the Tottenham Area Action Plan will not result in a likely significant effect on any European sites either alone or in combination with other projects and plans.

Appendix A. Background of Internationally Designated Sites

A.1 Lee Valley SPA and Ramsar site

A.1.1 Introduction

The Lee Valley SPA is located to the north-east of London, where a series of wetlands and reservoirs occupy about 20 km of the valley. The site comprises embanked water supply reservoirs, sewage treatment lagoons and former gravel pits that support a range of man-made, semi-natural and valley bottom habitats. These wetland habitats support wintering wildfowl, in particular Gadwall *Anas strepera* and Shoveler *Anas clypeata*, which occur in numbers of European importance. Areas of reedbed within the site also support significant numbers of wintering Bittern *Botaurus stellaris*. Lee Valley SPA is split into two sections, a northern and a southern. The southern section is located adjacent to the eastern boundary of the London Borough of Haringey. It contains Walthamstow Reservoir SSSI and Walthamstow Marshes SSSI. The northern section is located approximately 9.5km north of the Borough which contains Turnford and Chestnut Pits SSSI.

A.1.2 Qualifying Features

The site qualifies as an **SPA** for the following Annex I species:

- Wintering bittern *Botaurus stellaris*. 6 individuals representing at least 6.0% of the wintering population in Great Britain (5 year peak mean, 1992/3-1995/6)
- Migratory gadwall *Anas strepera*. 515 individuals representing at least 1.7% of the wintering Northwestern Europe population (5 year peak mean 1991/2 - 1995/6)
- Migratory shoveler *Anas clypeata*. 748 individuals representing at least 1.9% of the wintering Northwestern/Central Europe population (5 year peak mean 1991/2 - 1995/6)

The site qualifies under the following **Ramsar** criterion

Criterion 2: The site supports the nationally scarce plant species:

- whorled water-milfoil *Myriophyllum verticillatum* and the rare or vulnerable invertebrate *Micronecta minutissima* (a water-boatman).

Criterion 6: Species/populations occurring at levels of international importance.

Species with peak counts in spring/autumn:

- Northern shoveler, *Anas clypeata*, (NW & C Europe) 287 individuals, representing an average of 1.9% of the GB population (5 year peak mean 1998/9- 2002/3)

Species with peak counts in winter:

- Gadwall, *Anas strepera strepera*, (NW Europe) 445 individuals, representing an average of 2.6% of the GB population (5 year peak mean 1998/9-2002/3)

A.1.3 Conservation Objectives of the SPA

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the aims of the Wild Birds Directive, by maintaining or restoring; the extent and distribution of the habitats of the qualifying features.

- The structure and function of the habitats of the qualifying features
- The supporting processes on which the habitats of the qualifying features rely
- The population of each of the qualifying features, and,
- The distribution of the qualifying features within the site.

A.1.4 Environmental Vulnerabilities

- Water quality: eutrophication from waste water. This is being addressed by AMP3 funding under the urban Waste Water Treatment Directive

- Water quantity: over extraction of surface water for public consumption, notably during drought periods. This is managed via Environment Agency Review of Consents.
- Recreational pressure: this is managed by zoning of waterbodies within the Lee Valley Regional Park.

A.2 Epping Forest SAC

A.2.1 Introduction

Epping Forest is one of only a few remaining large-scale examples of ancient wood-pasture in lowland Britain and has retained habitats of high nature conservation value including ancient semi-natural woodland, old grassland plains and scattered wetland. The semi-natural woodland is particularly extensive, forming one of the largest coherent blocks in the country. Most is characterised by groves of over-mature pollards and these exemplify all three of the main wood-pasture types found in Britain: beech-oak, hornbeam-oak and mixed oak. The Forest plains are also a major feature and contain a variety of unimproved acid grasslands which have become uncommon elsewhere in Essex and the London area. In addition, Epping Forest supports a nationally outstanding assemblage of invertebrates, a major amphibian interest and an exceptional breeding bird community.

A.2.2 Qualifying Features

The site is designated as an **SAC** for the following features:

Annex I habitats:

- Atlantic *acidophilous* beech forests with *Ilex* and sometimes also *Taxus* in the shrublayer (*Quercion robori-petraeae* or *Ilici-Fagenion*); Beech forests on acid soils
- Northern Atlantic wet heaths with *Erica tetralix*
- European dry heaths

Annex II species:

- Stag beetle *Lucanus cervus*

A.2.3 Conservation Objectives of the SAC

Ensure that the integrity of the site is maintained or restored as appropriate, and ensure that the site contributes to achieving the Favourable Conservation Status of its Qualifying Features, by maintaining or restoring;

- The extent and distribution of qualifying natural habitats and habitats of qualifying species
- The structure and function (including typical species) of qualifying natural habitats
- The structure and function of the habitats of qualifying species
- The supporting processes on which qualifying natural habitats and the habitats of qualifying species rely
- The populations of qualifying species, and,
- The distribution of qualifying species within the site.

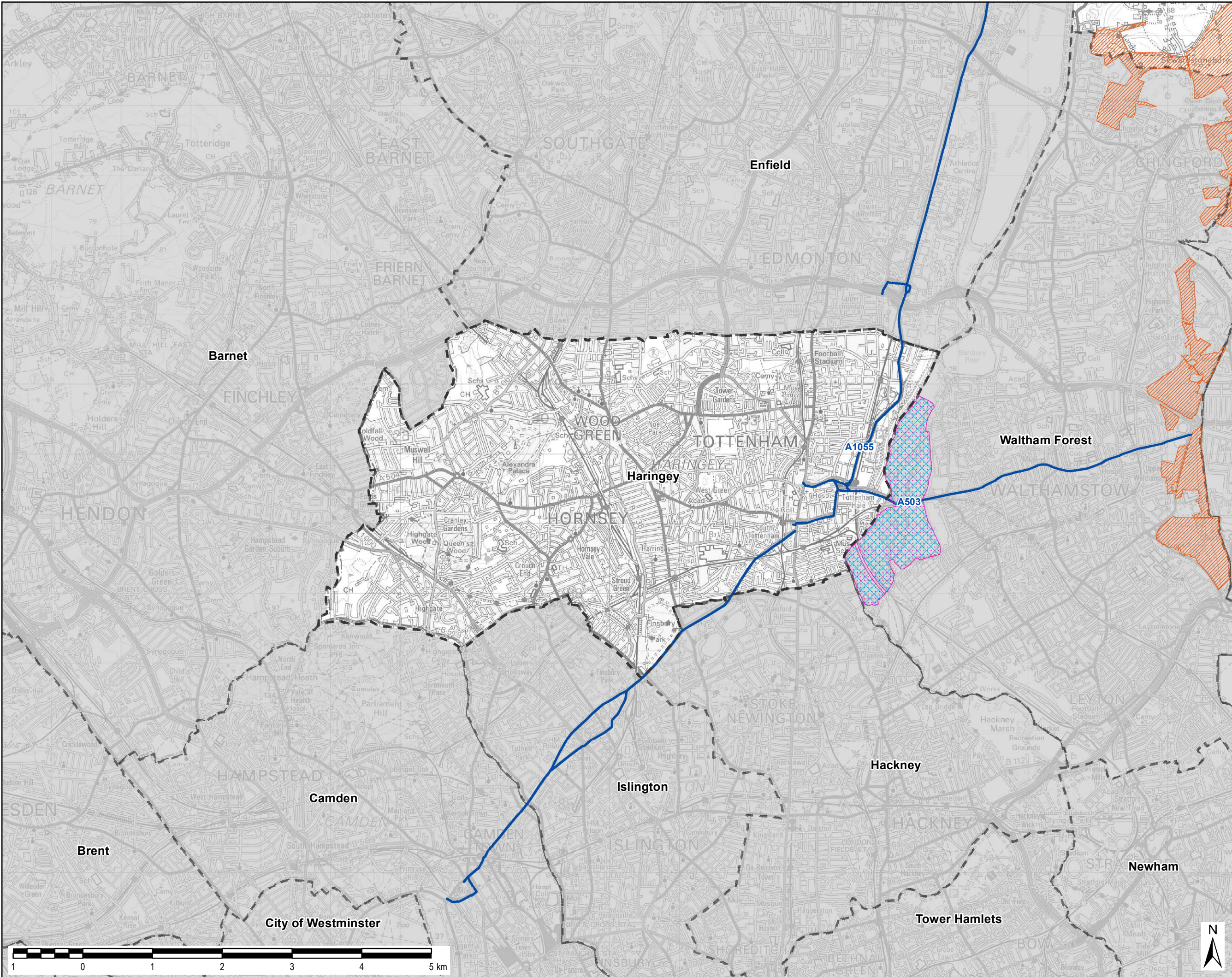
A.2.4 Environmental Vulnerabilities

- Habitat management: After neglect of the pollard cycle for over 100 years, re-pollarding of ancient beech trees was started in the early 1990s, and creation of maiden pollards was begun in 1995.
- Atmospheric pollution
- Lack of deadwood

Appendix B. Figures

Figure 1: Locations of Internationally Designated Sites

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LEGEND

- Haringey Borough Boundary
- London Borough Boundary
- Epping Forest Special Area of Conservation
- Lee Valley Ramsar Site
- Lee Valley Special Protection Area
- A Road

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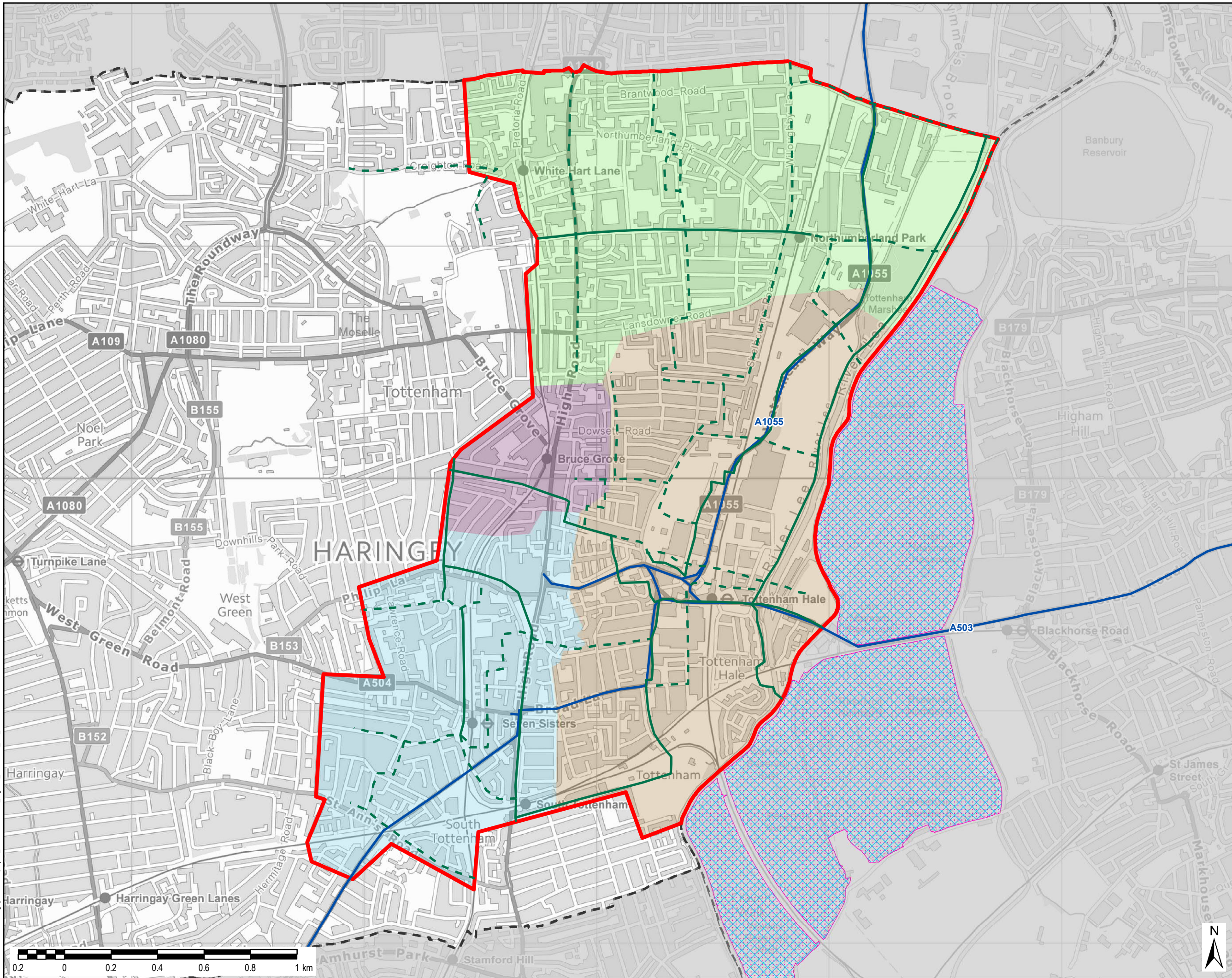
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Figure 2: Tottenham Area Action Plan

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- LEGEND**
- Haringey Borough Boundary
 - London Borough Boundary
 - Tottenham Area Action Plan
 - Lee Valley Ramsar Site
 - Lee Valley Special Protection Area
 - Bruce Grove Neighbourhood Area
 - North Tottenham Neighbourhood Area
 - Seven Sisters/ West green Road and Tottenham Green Neighbourhood Area
 - Tottenham Hale Neighbourhood Area
 - A Road
 - Existing Green Grid Route
 - Proposed Green Grid Route

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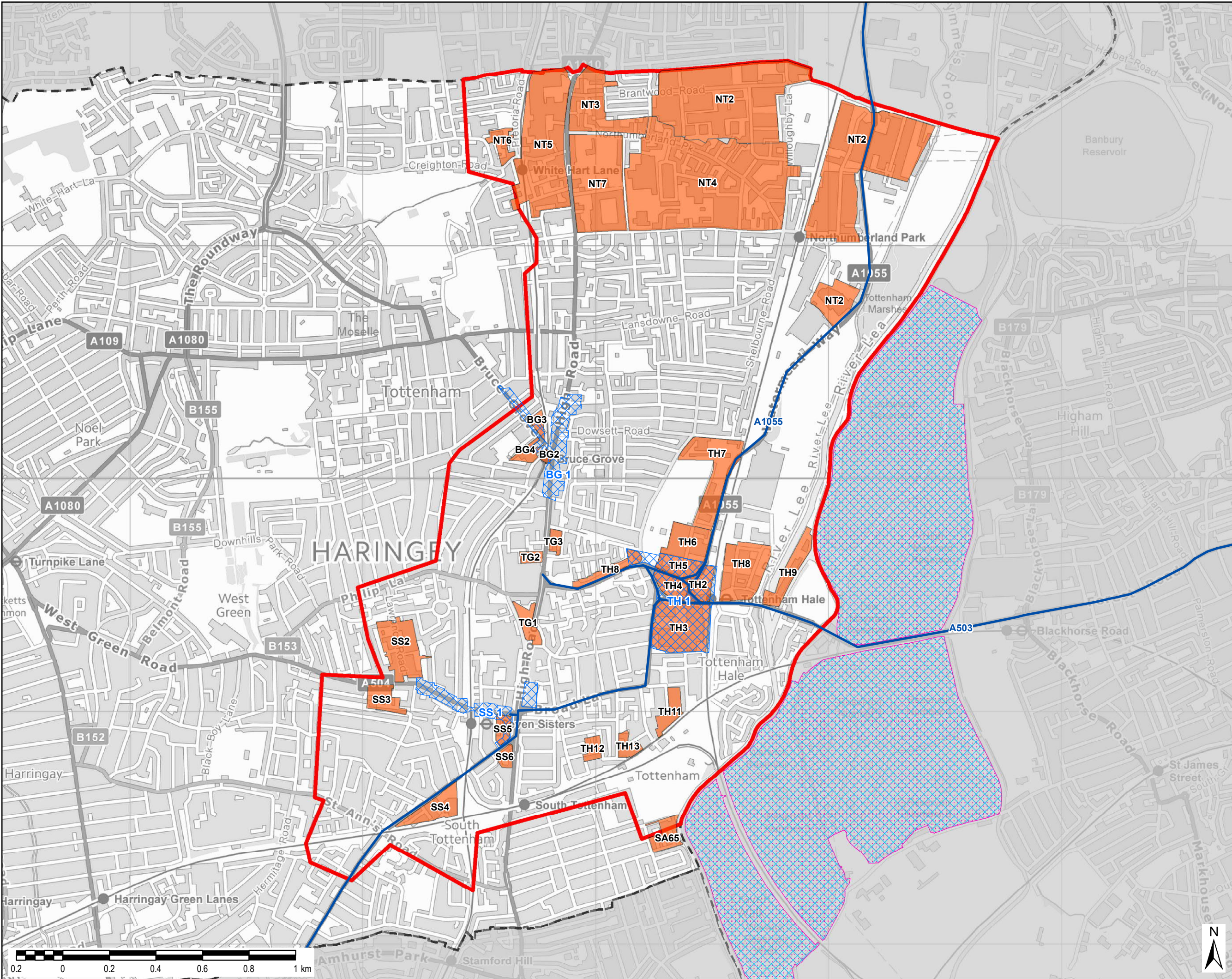
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Figure 3: Tottenham Area Action Plan Site Allocations

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- LEGEND**
- Haringey Borough Boundary
 - London Borough Boundary
 - Tottenham Area Action
 - Town Centre
 - Site Allocation
 - Lee Valley Ramsar Site
 - Lee Valley Special Protection Area
 - A Road

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TOTTENHAM AREA ACTION PLAN
SITE ALLOCATIONS**

Drawn	Checked	Approved	Date
S. Masnikosa	J. Waters	I. Hoffman	10/11/2015

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Appendix C. Screening Table

Policies identified in green have been screened from any further assessment due to a lack of realistic impact pathways.

Policies identified in orange have been screened in for further assessment as there is potential for impact pathways to affect internationally designated sites, resulting in likely significant effects.

Policy	Description	HRA Implications (Screening)
AAP1: Regeneration / Masterplanning	A. The Council expects all development proposals in the AAP area to come forward comprehensively to meet the wider objectives of the AAP. To ensure comprehensive and coordinated development is achieved, masterplans will be required to accompany development proposals which form part of a Site Allocation included in this Plan. Applicants will be required to demonstrate how the proposal: 1. Contributes to delivering the objectives of the Site, Neighbourhood Area, and wider AAP. 2. Will integrate and complement successfully with existing and proposed neighbouring developments 3. Optimizes development outcomes on the site B. The Council will direct development to Growth Areas and Areas of Change, and will support planning applications which accord to the delivery of Neighbourhood Objectives, and site requirements Site Allocations. Planning applications for development within the Tottenham AAP area which promote the positive regeneration of Tottenham, in line with the principles of the Strategic Regeneration Framework. C. The Council will take a proactive approach to working with landowners, the Mayor of London, the local community and other interested parties to help deliver the changes needed in Tottenham to meet the shared vision for the regeneration of Tottenham. D. Development proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes, create mixed and balanced communities within neighbourhoods, create economic opportunities for local residents and businesses, improve and enhance the local environment, and reduce carbon emissions and adapt to climate change, in accordance with the other policies of this AAP and Haringey's Local Plan.	This is effectively a development management policy relating to regeneration and masterplanning. This policy identifies Growth Areas and Areas of Change located within close proximity to Lee Valley SPA and Ramsar site. Impact pathways identified include: • Urbanisation; • Disturbance (from recreational and construction activities); • Air quality; • Water abstraction; and • Water quality. Growth Areas and Areas of Change have already been subject to HRA under a higher tier analysis at the Local Plan level.
AAP 2: Supporting	A. The Council will support land assembly to achieve comprehensive development, and will use compulsory purchase powers, only where	No HRA implications.

Policy	Description	HRA Implications (Screening)
Site Assembly	necessary, to assemble land for development within the Tottenham AAP area where: - Landowners and developers can demonstrate that they have: - A viable, deliverable and Local Plan compliant scheme; and - Have made all reasonable attempts to acquire, or secure an option over, the land/building(s) needed, through negotiation. - Comprehensive redevelopment of the assembled site is required to deliver the site's allocation as prescribed in Section 5 (including the requirements of a Masterplan where stated in the Plan) of this AAP; and - The development proposed for the assembled site would contribute to the delivery of the Tottenham AAP objectives. B. Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability.	This is a development management policy relating to site assembly. It does not define any location or quantum of development. There are no impact pathways present.
AAP3 Housing	- To improve the diversity and choice of homes and support mixed and balanced communities in Tottenham, the Council will seek the delivery of 10,000 additional new homes across the Tottenham AAP area in order to meet housing needs, contribute to mixed and balanced communities and to improve the quality of homes; - The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation; - Development proposals incorporating a housing element will be expected to provide the housing in accordance with the minimum capacities, set out in the Site Allocations in this AAP. Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised. - To better address the concerns of viability in delivering wholesale renewal on Haringey's housing estates in Tottenham (as listed in Alt53 of the Local Plan Strategic Policies), the Council will support higher density mixed tenure development, as a mechanism to - improve the quality and range of affordable housing options, - better address housing needs in Haringey; - secure a more balanced community; and - increase housing delivery in Tottenham.	This policy provides for 10,000 additional new homes within the Tottenham AAP area. Impact pathways identified include: • Urbanisation; • Disturbance (from recreational and construction activities); • Air quality; • Water abstraction; and • Water quality. The Amendment to Haringey Strategic Policies provides for 19,802 new dwellings throughout Haringey, including the 10,000 in the Tottenham area. Impacts from the 19,802 new dwellings were screened out within the HRA of the amendment to Strategic Policies. Whilst impact pathways do exist, these have therefore been screened out from further consideration at a higher tier (Local Plan level).

Policy	Description	HRA Implications (Screening)
AAP4 Employment	A. Within the Tottenham AAP area, the Council will facilitate the regeneration and renewal of selected Designated Employment Areas (DEAs) through a reconfiguration of the local employment offer in order to intensify land uses, maximise the amount of business floorspace and premises, and to increase the number and variety of jobs. This will be achieved by: - Re-classifying some of the area's Designated Employment Areas; - Protecting where appropriate industrial areas from inappropriate development as set out in SP8 and DM37; - Supporting development proposals for enabling led mixed-use schemes, in line with Local Plan Policy DM38; - Supporting development proposals for B1 Office uses in Tottenham Hale; - Supporting additional employment uses to be created along the High Rd - Intensification of industrial uses on the borough's stock of SIL; and - Effective enforcement of non-employment or non-conforming uses which if retained would be of detriment to the area's employment stock. B. The Council will support local residents to access local and London-wide jobs through the ongoing collection of planning contributions towards providing training courses in line with SP9. C. Employment Areas within Tottenham are designated as follows: Brantwood Road, N17 North East Tottenham N17 Marsh Lane, N17 Willoughby Lane, N17 Lindens/Roseberry Works Milmead and Lockwood, N17 Ashley Road South Hale Wharf South Tottenham, N15 Fountayne Road Rangemoor Road, N15 Constable Crescent	A number of the identified Employment Areas (such as Marsh Lane and Hale Wharf) are within 500m of the Lee Valley SPA/ Ramsar site. As such there is potential for likely significant effects via the following pathways: - Disturbance (from recreational and construction activities); - Air quality; and - Water quality.
AAP5 Conservation and Heritage	A. The Council will seek to strengthen the character and local identity of Tottenham by sustaining and enhancing heritage assets, their setting and the wider historic environment. Proposals for new development will be required to:	No HRA implications. This relates to conservation and heritage.

Policy	Description	HRA Implications (Screening)
	a. Reflect relevant character appraisals and management plans for the area; b. Identify and positively respond to the distinctive character and significance of heritage assets and their settings, whilst balancing the need to sensitively facilitate neighbourhood regeneration and renewal; c. Maximise opportunities for integrating heritage assets within new development and enhance connectivity between them d. Put heritage assets to viable uses consistent with their conservation, including through the adaptive re-use of vacant historic buildings, reinstating street frontages and historic street patterns, wherever possible. e. Reviewing Conservation Area Management Plans where appropriate, including reviewing existing boundaries. B. In line with the NPPF, paragraph 133, substantial or total loss of significance of designated heritage assets would only be considered where it satisfactorily justifies and demonstrates that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: a. the nature of the heritage asset prevents all reasonable uses of the site; and b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and c. conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and d. the harm or loss is outweighed by the benefit of bringing the site back into use. C. In line with the NPPF, paragraph 134, where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use. D. In line with the NPPF, paragraph 135, the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.	There are no impact pathways present.
AAP6 Urban Design and Character	A. The significant change planned for Tottenham's Growth Areas provides the opportunity to establish a new urban character for these areas. The Council will prepare Design Code SPDs for each area to ensure	This is a development management policy relating to design and character, including tall buildings. This policy does provide for development of tall buildings in specific locations that have potential to result in impact pathways

Policy	Description	HRA Implications (Screening)
including Tall Buildings	consistency of design across the area, and that a framework for high quality design is achieved. B. In line with DM6, Tottenham Hale and North Tottenham as growth areas, and the area directly adjacent to Seven Sisters Station have been identified as being potentially suitable for the delivery of tall buildings. Further details of these developments will be in accordance with the relevant Site Allocations, and proposals should follow the guidance set out Tall Buildings SPD. C. The appropriate height of development sites within Tottenham will be guided by the principles in Local Plan Policy DM1, and DM6, the reorientation of Tottenham Hale from an urban to a central area, the policy below, and the Site Allocations included in the Neighbourhood Areas Chapter. D. The Council expects the highest density development to be located adjacent to public transport nodes, and in Growth Areas and Areas of Change. At their boundary, development is expected to transition between these areas and the suburban areas of the AAP through appropriate transition/scaling of heights. E. The recommendations of the Urban Characterisation Study will ensure the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification and regeneration in order to help create legible neighbourhoods. F. Taller buildings will be appropriate along (parts of) Tottenham High Road, Park Lane, Lordship Lane, Northumberland Park, Broad Lane, Lawrence Road, West Green Road, Seven Sisters Road, Monument Way, Ferry Lane, and within existing mid-rise residential areas, responding to the prevailing mid-rise character, and in some cases promoting intensification, increasing heights from low-rise to mid-rise where appropriate. G. Retained suburban areas will be protected from inappropriate development, with taller development only being permitted where it can be demonstrated that the existing character of the area will not be compromised. H. The impact of new development, and particularly tall buildings should be considered against the requirements to protect Local Views as asset out in DM5: Locally significant views and vistas. I. Where proposals fall within 500m of a Special Protection Area/ RAMSAR areas, specific measures should be set out to ensure there is no adverse effect on ecological integrity. Applicants are encouraged to engage with Natural England during pre-application discussions.	linking to Lee Valley SPA and Ramsar site. However, this is overall a positive policy providing protection for internationally designated sites. Point I states: <i>'Where proposals fall within 500m of a Special Protection Area/ RAMSAR areas, specific measures should be set out to ensure there is no adverse effect on ecological integrity. Applicants are encouraged to engage with Natural England during pre-application discussions.'</i> In relation to ensuring no likely significant effects result from the Tottenham AAP, this is a positive 'hook' policy.
AAP7	A. The Council will support future improvements in the levels of public	No HRA implications.

Policy	Description	HRA Implications (Screening)
Transport	transport accessibility and capacity across the Tottenham AAP area. The Council expects development proposals to: - Seek improvements to connectivity and permeability for pedestrians whilst minimising the likelihood of conflicts with vehicular traffic. - Consider opportunities for improving walking and cycling across the AAP area, which could include the introduction of a wider cycling and walking network; and - Promote where appropriate, traffic calming, pedestrian accessibility enhancements, road safety measures and cycle facilities such as on street cycle parking; B. Developments proposed within 1km of a proposed Crossrail 2 station should show how they meet the requirements of Policy SA1. C. Parking provision will be expected to be delivered in accordance with Policy DM32 of the Development Management DPD; and D. In line with Haringey's Local Plan policies, the London Plan, the Local Implementation Plan [LIP] and the Mayor's Transport Strategy, the Council will work with its partners to promote and support the delivery of key infrastructure proposals to support the regeneration of Tottenham which are set out in the Neighbourhood Area wide section of this AAP. E. The Council will support applications which enhance the transport interchange between Tube, train bus, and pedestrian/cycling modes at Tottenham's transport interchanges. F. Sites required for the construction of Crossrail 2 safeguarding will be protected as necessary. The Department for Transport and TfL should be consulted with regards planning applications on any formalised Crossrail alignment. G. In order to maximise the utility of Seven Sisters station, development which can enhance pedestrian and cycling routes to and from the station will be supported. H. The Council supports the addition of a Cycle Superhighway that passes runs from THFC to the City, and this will be required to be produced in a manner that adds legibility to the urban realm in this area.	This is a positive policy in that it provides to improve public transport links and cycling/ walking network. There are no impact pathways present.
AAP8: Development along Tottenham High Rd	- Development on Tottenham High Rd will be supported where it is demonstrated to positively enhance the overall character and setting of Tottenham High Rd. - The High Road has a number of District and Local Centres along its length, and uses within these will be in line with DM42 and DM43. - Development will be expected to provide active frontages onto the High Rd between designated centres to provide activity along its length. A wide range of non-A1 or C class uses will be supported here. - Due to the excellent public transport connections, and in order to manage	This is effectively a development management policy relating to Tottenham High Road. It specifically notes that Class C (residential/ HMO/ hotels) will not be supported. This policy supports car-free development and the Cycle Superhighway 1. Tottenham High Road is located more than 1km from the from the Lee Valley SPA and Ramsar site.

Policy	Description	HRA Implications (Screening)
	flow on the High Rd, car-free development will be supported. Developments that help to optimize the benefits of Cycle Superhighway 1, including through the design of the site, and the incorporation of cycle parking facilities, will be supported. E. Development which positively enhances the distinctive character and setting of neighbouring and nearby buildings, and produces improved views along the High Road, including long views from other parts of the High Rd, and from adjacent streets, will be supported. F. Opportunities to create new space for enterprise and commercial uses to the rear properties fronting the High Rd will be permitted. Where a site with a back of High Rd frontage is redeveloped, an employment ground floor use will be sought.	
AAP9: Tottenham Green Grid	A. In areas identified as deficient in access to open space and nature, a high priority will be afforded to opportunities to enhance access through on-site provision or contributions to the implementation of relevant Tottenham Green Grid projects. B. Development proposals for sites adjoining the Green Grid will need to take account of the route and ensure that opportunities are taken to provide new developments which address the route along its built edges. C. The principles included in the Council's Green & Open Spaces Strategy should be adhered to in the creation of the Green Grid.	Whilst this policy provides for new 'Green Grid' routes adjacent Lee Valley SPA and Ramsar site. However, these routes do not pass directly into the SPA and Ramsar site, are located along existing 'Blue Ribbon' routes and are separated from the designated site by the presence of the River lee and the Lee Navigation, and is screened from the designed site by tall vegetation.
AAP10: Meanwhile Uses	The Council will support, through the granting of temporary planning consents, and where appropriate, time-limited Local Development Orders, "meanwhile" uses on allocated development sites which are not expected to come forward in the short term. Such uses will be required to demonstrate how they contribute to the vibrancy of the immediate area and support the delivery of the development outcomes and vision as set out in this Plan.	No HRA implications. This is a development management policy relating to 'meanwhile uses'. There are no impact pathways present.
AAP11: Infrastructure	A. The Council will plan positively to introduce improved facilities in Tottenham which meets the overall needs of the population, including meeting existing deficits, as well as the needs of new developments. B. The Council will actively seek to introduce tertiary employment operators into the Tottenham area to ensure local residents have excellent options to gain skills to access the London jobs market. C. New primary and secondary provision to match growth will be created in the growth areas of Tottenham Hale and North Tottenham. This will principally be at the new Harris Academy on Ashley Rd in Tottenham Hale, and within the Northumberland Park masterplan regeneration area in North Tottenham. D. The council will work with developers and construction companies to create local employment opportunities through:	This is a development management policy relating to infrastructure. This policy identifies the Growth Areas of Tottenham Hale and North Tottenham (including Northumberland Park). Impact pathways present include: • Urbanisation; • Disturbance (from recreational and construction activities); • Air quality; • Water abstraction; and • Water quality.

Policy	Description	HRA Implications (Screening)
	i. Ensuring local labour can access construction jobs ii. Creating apprenticeships iii. Ensuring contributions towards local skills regeneration are gained when employment floorspace is lost on a site.	
SS1: Seven Sisters and West Green Rd District Centre	A. The Council will support planning applications for development within the Seven Sisters and West Green Rd District Centre as indicated in Map X to promote the positive regeneration of the area. B. Development proposals will be resisted where they involved the amalgamation of individual shop units, in order to preserve the historical streetscape rhythm and preserve opportunities for independent traders. C. To retain the viability of the shopping area, the primary retail frontages will be adjusted as follows:- i. The primary frontage will be transferred to secondary shopping frontage between 70 to 126a (even), and 51-95 (odd) West Green Road to support the consolidation and intensification of the town centre uses. D. Active town centre uses including retail, restaurant/café, leisure, commercial or community facilities will be required on all ground floor street frontages; E. Small floor plate units a near the underground station are appropriate to create activity and vibrancy and security; F. The Council will require the retention of the Seven Sisters Market in the area. G. Council will support retention, repair and reinstatement of historic shop fronts and facades including innovative and creative branding opportunities to celebrate the area's independent and multi cultural shops; H. A high quality urban realm will be created around Seven Sisters station. I. Unauthorised and incorrectly implemented planning consents in the centre will be a focus for enforcement action to ensure high quality of design is maintained.	This is a development management policy relating to Seven Sisters and West Green Road District Centres. At their closest these are located more than 700m from Lee Valley SPA and Ramsar site.
SS2: Lawrence Road	Mixed use development with commercial uses at ground floor level and residential above.	No HRA implications. No impact pathways present.
SS3: Brunel Walk and Turner Avenue	Potential masterplanned housing estate renewal opportunity to improve the quality and utility of the housing stock on the site.	NB: See in-combination assessment section.
SS4: Gourley	Comprehensive mixed use redevelopment in accordance with a site wide masterplan providing new employment space and residential use.	

Policy	Description	HRA Implications (Screening)
Triangle		
SS5: Wards Corner	Mixed use development providing town centre uses at ground floor level, including a replacement market, with the potential for residential use above.	
SS6: Apex House & Seacole Court	Mixed use development with town centre uses at ground floor level and residential above.	
TG1: Tottenham Green's Civic Heart	Development which serves to consolidate and improve access to community facilities in the Tottenham Green area will be supported. A. Permissible uses on sites surrounding the Green will include community facilities, and secondary town centre uses such as restaurant and café use. B. Developments will positively enhance the setting of the listed buildings including Holy Trinity Church and that of Tottenham Green as an Open Space, closing street frontages where appropriate; improve footfall and activity along Town Hall Approach Road, and will be of a scale consistent with the existing buildings in the area. C. Tottenham Green itself will be enhanced, with opportunities to use the Green for public events such as markets and fetes supported.	No HRA implications. Whilst this policy defines an area, it does not identify any specific development types that could result in impact pathways linking to internationally deigned sites. It provides for improvement to green space at Tottenham Green, the Holy Trinity Church. Improvements to green space is a positive policy as it encourages people to use local green space amenities, rather than utilizing sensitive internationally designated sites. There are no impact pathways present.
TG2: Tottenham Chances & Nicholson Court	Mixed use development which creates an enhanced community use, with residential infill.	No HRA implications. No impact pathways present. NB: See in-combination assessment section.
TG3: Tottenham Police Station and Reynardson Court	Subject to reprovion of the Police Station locally, conversion of the existing police station to include commercial space for SME and start up businesses. Redevelopment of Reynardson Court, and the car park to the rear, for improved housing stock and improved/enhanced open space.	
BG1: Bruce Grove and Tottenham High Road District Centre	1. The Council will adjust the designated retail frontages to ensure that there is a consolidation of retail uses on Tottenham High Rd; 2. For the Bruce Grove area frontage, uses will be permitted that enable a character area that promotes a cafe and restaurant type environment. 3. An improved public realm to encourage pedestrian activity, this including where possible pavement widening measures; 4. Residential units behind ground floor could be acceptable provided they are carefully designed to allow overlooking on to the public realm without compromising the use of the town centre unit.	This is a development management policy that relates to frontages and character. It aims to improve the public realm. It does provide for residential development, however, no quantum is identified within this policy.

Policy	Description	HRA Implications (Screening)
	5. The Council will enhance this District Centre along the High Road as the principal high street shopping area, reinforcing its historic and diverse character. 6. Opportunities to improve shop fronts including enforcing against unauthorised development which contributes negatively to the overall appearance of the area.	
BG2: Bruce Grove Station	Improvements to Bruce Grove Station and forecourt including creation of new A3 use on Tottenham High Rd, and mixed use employment and residential on Moorefield Rd.	No HRA implications. No impact pathways present.
BG3: Bruce Grove Snooker Hall and Banqueting Suite	Masterplanned redevelopment including the retention of existing Banqueting Suite building, entrance to the former cinema building, and former public toilets building, with redevelopment of the remainder of the former cinema, and land behind, for town centre uses at ground floor level (fronting Bruce Grove) with residential above and behind.	NB: See in-combination assessment section.
BG4: Tottenham Delivery Office	Residential-led development incorporating replacement employment space, and creation of a new public route from Moorefield Road through the site to the southern end of Champa Close to increase permeability within the area and improve access to an improved Bruce Grove wood.	
NT1: Northumberland and Park Station	A. Sites required for the construction of Crossrail 2 safeguarding will be protected as necessary. B. Sites within 400m (a 5 minute walk) of a proposed Crossrail 2 station will be closely scrutinised to ensure the proposed development optimizes the future accessibility provided by the introduction of Crossrail 2. This may include ensuring that a mix of uses and potentially enhanced infrastructure may be required from proposals in this area. C. Sites within 800m (10 minute walk) of Crossrail will be scrutinised for how they can complement the introduction of Crossrail 2. This may include design issues such as provision of routes to and from the station, and consideration of density to include future PTAL increase.	No HRA implications. This policy is regarding safeguarding land for Crossrail 2. It is noted that this policy does imply development, but does not define development. There are no impact pathways present.
NT2: Strategic Industrial Land in North East Tottenham	The Council will support development which: A. Increases job density and therefore helps to meet the employment needs of the borough; B. Enables small firms to start up, and grow, in flexible industrial space; C. Improves the interface of the industrial area and the Lee Valley Regional Park; D. The Council will not encourage warehouse living or residential encroachment in this area.	This is a general development support policy which does not specify a quantum or location (except within the Tottenham area) of development. There are thus no impact pathways present.
NT3:	Comprehensive masterplanned improvement of the area to improve existing,	For most of these sites there are no HRA implications as no impact pathways

Policy	Description	HRA Implications (Screening)
Northumberland and Park North	and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include the provision of additional high quality housing with an increased range of types, sizes, and tenures, improvements to existing housing stock, new public spaces and new community infrastructure. Town Centre uses will be encouraged on the High Rd and Northumberland Park.	present. NB: See in-combination assessment section. NT3 and NT4 are located within 200m of the SPA and SAC and have HRA implications.
NT4: Northumberland and Park	Comprehensive masterplanned improvement of the area to improve existing, and create new, residential neighbourhoods through the delivery of a major estate regeneration programme that will include the provision of additional high quality housing with an increased range of types, sizes, and tenures, improvements to existing housing stock, new public spaces and new community infrastructure.	Impact pathways present include: • Disturbance (from recreational and construction activities); • Air quality; and • Water quality.
NT5: High Road West	Masterplanned, comprehensive development creating a new residential neighbourhood and a new leisure destination for London. The residential led mix use development will include a new high quality public square and an expanded local shopping centre, as well as an uplift in the amount and quality of open space and improved community infrastructure.	
NT6: North of White Hart Lane	Masterplanned comprehensive residential-led mixed use development with the potential to accommodate community uses, improve accessibility, and enhance the White Hart Lane retail frontage.	
NT7: Tottenham Hotspur Stadium	A. Redevelopment of existing football stadium to increase match day capacity, with the introduction of residential, commercial, education, community, leisure and hotel uses, and improved public realm across the site. B. The Council will support a mix of leisure uses around Tottenham Stadium to ensure it is a destination on match and non-match days; C. Development will contribute to creating a wider commercial and visitor destination for the area; D. Walking and cycling are important modes of transport around the Stadium, and links will be encouraged, particularly between nearby stations at White Hart Lane and Northumberland Park, and the Stadium; E. New health uses will be incorporated into the Stadium	
TH1: District Centre in Tottenham Hale	A. The Council will support planning applications for development within the Tottenham Hale District Centre as indicated in Map X to promote the positive regeneration of Tottenham Hale. B. Comprehensive development will be required to meet the overarching aims of this policy, and principles set out in any future masterplanning	Tottenham Hale District Centre is located approximately 400m from the Lee Valley SPA and Ramsar site, west of the rail line. However, this is effectively a development management policy. It supports retail, leisure, community and residential development.

Policy	Description	HRA Implications (Screening)
	document to provide: - A substantially improved public realm that unifies the streets and spaces around the former gyratory, improves access to Tottenham Hale Station, and prioritises pedestrian and cyclist circulation and safety; - A new urban form – consistent with the areas status and accessibility; - Attractive and functional public spaces located around the gyratory; - Incorporate permeable surfaces, green space and trees. C. A range of retail, leisure or community facilities on ground floor frontages, with residential or office above; D. Small-scale units and kiosks near the underground station, to create activity and vibrancy and security; E. Uses which are considered appropriate for Tottenham Hale are consistent with National Planning Policy Framework town centre uses.	Impact pathways present include: - Disturbance (from recreational and construction activities); - Air quality; and - Water quality
TH2: Tottenham Hale Station	Creation of a new station interchange, with: - A station environment which supports excellent and efficient public transport facilities - New residential and/or commercial development above the station, creating the centre of a new District Centre at Tottenham Hale. - Enabling over the longer term of sites to be developed for the creating of new rail projects linked to the STAR and/or Crossrail 2 schemes. - Creation of a new urban square enclosed by activities which help to attract people and increase dwell times, act as a new high quality point of arrival, departure and interchange, , and acts as a focus for Tottenham Hale District Centre - Links into routes which are easy, safe and pleasant for people to move through, as set out in the District Centre Framework and Streets & Spaces Strategy, Supports east-west and north-south movement	For most of these sites there are no HRA implications as no impact pathways present. NB: See in-combination assessment section. TH8 and TH9 are located within 200m of the SPA and SAC and have HRA implications. Impact pathways present include: - Disturbance (from recreational and construction activities); - Air quality; and - Water quality.
TH3: Tottenham Hale Retail Park	Comprehensive redevelopment to form part of the new Tottenham Hale District Centre along with adjoining sites to the north. New road layout, including a fine graining of the street layout, creating town centre uses at ground and first floor levels, with residential and commercial uses above.	
TH4: Station Square West	Comprehensive redevelopment incorporating new District Centre uses at ground and first floor levels, including a hotel use, with residential and commercial above. Creation of a high quality public realm including the extension of Ashley Rd as the primary route through the site.	
TH5: Station	Comprehensive redevelopment of the southern end of Ashley Road for	

Policy	Description	HRA Implications (Screening)
Square North	ground floor town centre uses with a mix of residential and employment above, forming part of the new District Centre.	
TH6: Ashley Road South Employment Area	Creation of an employment led mixed use quarter north of a new District Centre, creation of a new east-west route linking Down Lane Park and Hale Village, and enhanced Ashley Rd public realm. Residential use will be permitted to cross subsidise improvements to employment stock.	
TH7: Ashley Road North	New residential development complementing the amenity of Down Lane Park, and the extension of Ashley Rd as a pedestrian and cycling connection north through to Park View Rd. Creation of new educational facility.	
TH8: Hale Village	Completion of Hale Village reflecting the current planning permission and masterplan, with a new mixed use tower consisting of town centre uses at ground floor, with residential, and potentially a hotel above.	
TH9: Hale Wharf	Comprehensive redevelopment to provide a mix of uses, with replacement employment, new residential and a leisure destination linked to the Lee Valley Regional Park.	
TH10: Welbourne Centre & Monument Way	Comprehensive redevelopment of the Welbourne Centre for secondary town centre uses (which could include a health centre) at ground floor level, and residential above. Limited new residential development to the south of Chesnut Estate.	
TH11: Fountayne Road	Potential development to increase accessibility and provide increased employment floorspace and warehouse living accommodation.	
TH12: Herbert Road	Potential redevelopment of the sites for commercial-led mixed use development with residential.	
TH13: Constable Crescent	Potential development to increase accessibility, provide increased employment floorspace and warehouse living accommodation.	

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Sustainability Appraisal (SA) of the Haringey Local Plan

Non-technical summary of four SA Reports:

- The Strategic Policies Alterations SA Report
- The Site Allocations DPD SA Report
- The DM Policies DPD SA Report
- The Tottenham AAP SA Report

November 2015



Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	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	Steve Smith, Technical Director	Steve Smith, Technical Director

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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 ('pre-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?

An important first step in the SA process involves establishing the 'scope', i.e. those sustainability issues and objectives which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

- What's the sustainability context?
 - Answering this question primarily involves reviewing Government's National Planning Policy Framework, and the London Plan and adopted local policy; however, it is also important to 'cast the net wider' and consider contextual messages promoted by other influential organisations.
- What's the sustainability baseline?
 - Answering this question involves reviewing available data to establish an understanding of the current and likely future state of the environment / socio-economy locally.

The following is a *brief summary* of some of the sustainability baseline issues described within the SA Report, i.e. introduced as falling within the scope of SA.

N.B. The information presented under the heading 'What's the scope of the SA?' is identical within three of the four Interim SA Reports, whilst the information presented on the SA scope within the Tottenham AAP Interim SA Report reflects the need for a focus on Tottenham specific issues.

Social issues

- 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.
- Health inequalities in Haringey are evident; with the most deprived areas in the east of the borough tending 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. Also, childhood obesity rates in the borough are higher than the London and England average.
- Affordability of housing is a significant issue in the area. 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). The borough also has notable levels of homelessness, with 3000 people officially in temporary accommodation.
- 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 population in the west of the borough is predominantly 'older' than the east.
- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- The percentage of Haringey residents with no qualifications (8.6%) is in-line with the regional average, but in Tottenham Hale 22.45% of residents aged 16 and over have no qualifications.

Economic issues

- When 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.
- 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. However, Tottenham has some of the highest levels of unemployment in London.
- 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.
- 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.
- Haringey's town centre vacancy rates have increased in recent years, but remain lower than national and regional averages. However, the borough's centres are not performing equally in this respect.

Environmental issues

- The borough has a total of 60 areas designated as Sites of Importance for Nature Conservation (SINCs), which vary in terms of importance/sensitivity. Haringey also has five Local Nature Reserves (LNRs) and waterways also offer a valuable habitat. The Lee Valley Regional Park straddles the eastern boundary of the borough, and is home to European designated sites and is a Site of Special Scientific Interest.
- The borough's 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. Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace. Also, 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.

- The Lee Valley presents a significant recreational asset, which could serve to link Haringey with developments in East London most notably the Olympic Park. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land. The borough has an overall provision of 1.7 ha of open space per 1,000 of population, although there are some areas of deficiency. The All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- 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. 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, although there is also some risk from reservoir breach. Climate change effects will increase flood risk.
- The borough suffers poor air quality primarily because of traffic congestion, with the whole borough designated as an Air Quality Management Area.
- A headline message of the Haringey Annual Carbon Report is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%, consistent with London-wide and national trends.
- 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.

The SA 'framework'

Drawing on the findings of the context / baseline review, a list of sustainability objectives was identified under 21 'topic' headings. This list of topics, objectives and associated 'appraisal criteria' has been drawn-on as a methodological 'framework' for SA (i.e. for the appraisal of alternatives and the draft plan).

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	• 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?

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	• 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?
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 wider 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?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
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?
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?

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 / SA Report is considered in turn below.

The Strategic Policies Partial Review

Part 1 of the SA Report explains how **alternative spatial strategies** – i.e. alternative approaches to distributing the housing quantum assigned to Haringey by the London Plan (2015) - were appraised in the run-up to finalising the plan for publication.

[N.B. The 2015 requirement is 1,502 homes per annum, which equates a level of growth significantly (682 homes per annum) above that which was anticipated when preparing the adopted Strategic Policies.]

The alternatives subjected to appraisal were as follows –

- Option 1 -** The 2013 spatial strategy in the adopted Strategic Policies document, with updates to selected Growth Areas / Areas of Change, reflecting new evidence on site capacity.
- Option 2 -** Dispersed growth with each ward taking a roughly equal share of the additional housing (i.e. the additional 682 homes per year) above and beyond the existing spatial strategy.
- Option 3 -** Town centre and Crossrail 2 focused growth, with the additional housing (i.e. the additional 682 homes per year) focused at hubs in and around all town centres and Crossrail stations.

After explaining 'reasons for selecting the alternatives dealt with', the SA Report presents appraisal findings within a table that comprises 21 rows (one for each of the sustainability 'topics' established through scoping) and three columns (one for each of the alternatives under consideration). For each sustainability topic, the table both A) identifies instances where a particular option would likely lead to 'significant effects' (positive or negative) in terms of sustainability objectives; B) ranks the performance of the alternatives.

The conclusion of alternatives appraisal is as follows –

- Option 1 and 3 perform equally well in terms of a number of objectives. In terms of 'health', 'town centres' and 'sustainable transport' significant positive effects are predicted and there is little to differentiate between the two options. Options 1 and 3 are also anticipated to have significant positive effects in terms of 'accessibility' related objectives, although in this instance the appraisal suggests that Option 1 is preferable.

Option 1 would also likely lead to significant positive effects in terms of housing and energy/carbon; however, it should be noted that under Option 1 there is the greatest likelihood of worsening flood risk locally, given that housing would be concentrated in flood zone 2. The appraisal also highlights some potential risks around 'community cohesion' under Option 1, and identifies the importance of taking this into account when planning for and implementing development consistent with the plan policies, in Tottenham in particular.

No significant positive impacts are identified for Option 2 (Dispersal), reflecting the fact that considerable opportunities would be missed through an approach that distributes growth. Significant negative effects are predicted in terms of 'health' and 'accessibility', given the challenges that would likely arise around infrastructure delivery. Significant negative effects are also predicted in terms of townscape / cultural heritage, although there is some uncertainty in this respect.

Part 1 of the Strategic Policies Interim SA Report then concludes with a section explaining the Council's reasons for selecting/developing the preferred approach in-light of alternatives appraisal. The Council recognises that there are a range of likely effects associated with each option, but explains why Option 1 is on balance preferred.

The Council's reasons for selecting the preferred approach are as follow –

- “The preferred approach is to apply the higher growth figures to the spatial strategy established in the adopted Strategic Policies DPD, with updates to selected Areas of Change / Growth Areas, reflecting new evidence on site capacity. This option ensures the spatial strategy for Haringey remains consistent with the approach previously developed through extensive consultation with the local community and other stakeholders, as well as through an iterative process of Sustainability Appraisal. The option is considered to be the most sustainable and deliverable of the alternatives considered, in particular given: the existing distribution of sites across the borough which are capable of accommodating future growth, taking account of development constraints, such as significant open spaces and sites of ecological importance; its capacity to both optimise and facilitate focused provision of infrastructure, services and facilities to support growth; and its conformity with the spatial development strategy for London and alignment with the Council's key regeneration objectives, with a focus on areas of need. Further policies, such as Development Management Policies and Site Allocations, will give effect to the spatial strategy and appropriately address matters raised in the SA (e.g. flood risk) through site specific requirements. The SA finds the preferred approach to perform well against alternatives, with likely significant positive effects across a range of sustainability objectives.”

The Site Allocations DPD

Part 1 of the SA Report explains how **three sets of alternatives** were appraised in the run-up to finalising the plan for publication.

Sets of alternatives that have been the focus of appraisal

Issue	Option 1 (the preferred option)	Option 2
Office uses in Wood Green	Reduction in office uses, despite high accessibility (PTAL)	Promotion of office uses prevalent, commensurate with high PTAL
Haringey Warehouse District	Allow a mix of uses including residential	Maintain as employment, reflecting employment designation
Open space	Do not allocate sites for purely open space	Seek to allocate sites for purely open space

After explaining reasons for focusing on these three issues, and reasons for selecting the alternatives dealt with in each instance, the SA Report presents appraisal findings within three tables (see above for a discussion of how the tables are structured).

Conclusions of alternatives appraisal are as follows -

- **Office uses in Wood Green** - Option 1 (Managed reduction in office uses) performs best in terms of a range of sustainability objectives, stemming from the suggestion that this approach will support a targeted approach to regeneration in Wood Green, leading to a diversification of uses and a situation whereby the town centre is vibrant and has a clear role to play sub-regionally. It is not thought that a decision to reduce office space in Wood Green will have negative implications from an economic growth perspective, given that there are a number of other areas locally where demand for offices is high, and the effect of regeneration in Wood Green should be to enhance the image of Haringey in general as a place to do business and invest. The draw-back to Option 1 relates to ‘sustainable transport’ objectives; however, there are other locations with high PTAL that are set to be a focus of office development.
- **Haringey Warehouse District** - Option 1 (Allow a mix of uses including residential, despite employment designation) is likely to lead to widespread benefits given existing issues around unauthorised warehouse living (not least around poor living environments) and the fact that supporting the creative sector is an important economic objective for Haringey. There are potentially some draw-backs – including those that

relate to the loss of floorspace for traditional industries – but it is anticipated that policy measures can be put in place to mitigate effects.

- **Open space** - There is difficulty in increasing the quantity of public open space in Haringey, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. Benefits of a Green Grid approach will be wide-spread, and hence 'significant positive effects' are predicted under a number of topic headings, most notably 'transport' and 'accessibility'.

Part 1 of the Sites DPD SA Report then concludes with a section explaining the Council's reasons for selecting/developing the preferred policy approach – in relation to each of the three plan issues - in-light of alternatives appraisal. The Council recognises that there are pros and cons associated with each of the options that has been the focus of appraisal, but explains that:

- **Office uses in Wood Green** - "The Further Alterations to the London Plan downgraded Wood Green's status as a preferred office location. While the Council is keen to maximise employment opportunities in the borough, and in particular within Wood Green and Tottenham, both the ELR and workspace viability study show that Wood Green faces challenges from cheaper stock outside of London and preferential locations in central London. It is therefore not deliverable approach to plan for significant large-scale office in this area, rather small scale and flexible workspace, or public sector occupants should be sought. Either way, the current stock is not of a high quality, and regeneration is a suitable approach to attracting investment to the centre. In addition, there is a risk that Permitted Development Rights allowing conversion from office to residential uses would threaten a strategic approach reliant on office development."
- **Haringey Warehouse District** - "The Council is committed to addressing the issue of warehouse occupation in parts of the south of the borough. As with non-designated employment sites above, the building stock in these areas is not always suitable for knowledge-based industries. Consultation with commercial agents in the area shows that there is interest from occupants to move to this area, which can be attributed to the improving reputation of the area being brought about by the warehouse occupants. The challenge now lies in harnessing this reputational uplift, and translating it into jobs. Therefore the Council is proposing a policy position that creates masterplan-led development which creates new employment floorspace, while creating spaces that the existing residential community wish to remain in and which would appeal to other potential occupiers."
- **Open space** - "Areas of the borough are deficient in open space. Competing against this are significant jobs and homes targets, which make the allocation of significant new open spaces very challenging. It is therefore the Council's aim that existing network of open spaces should be enhanced, and linkages to them improved, so that the borough's growing population can better access and utilise the existing open space assets within the borough."

The DM Policies DPD

Part 1 of the DM Policies DPD SA Report explains how **13 sets of alternatives** were appraised in the run-up to finalising the plan for publication.

Sets of alternatives that have been the focus of appraisal

Plan topic	Option 1	Option 2
Housing conversions	Establish a restricted conversion area to preserve larger and family homes	Do not establish a restricted conversion area
Housing density and design	Apply London Plan density standards, but allow flexibility in applying these standards, based on local circumstances, to optimise housing delivery	London Plan standards applied with no flexibility for consideration of local or site circumstances
Employment sites (1)	Requirement to maximise employment densities on sites	Less restrictive approach, with no specific steer for higher employment densities

Plan topic	Option 1	Option 2
Employment sites (2)	Allow introduction of non-employment uses (as part of mixed use schemes) in certain designated employment locations, to cross-subsidise and enable new employment development to come forward	Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development
Town centre uses	Set thresholds for percentage of A1 uses in primary and secondary frontages	No thresholds or different (higher/lower) thresholds for A1 uses
Negative clusters	Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)	No policy - applications assessed against other town centre use policies
Tall buildings	Detailed policy for the siting and design of tall buildings, within identified locations, taking account of site specific circumstances and supported by Haringey's Urban Characterisation study	Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD
Views and vistas	Policy to minimise disturbance of identified local views and vistas	Only protect London Plan strategic views
Heritage and conservation	Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use	Do not apply policy to non-designated heritage assets
Car-free or car-capped developments	Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned	Parking required, in accordance with the London Plan parking standards
Carbon offsetting	Carbon offsetting fund to better enable developers to meet carbon targets	No carbon offsetting (CO2 reductions must be met on site)
Community infrastructure	Policy to set location requirements for new / extended community facilities	No specific location requirements - accept facilities wherever proposed
Open space provision	Policy to allow for the reconfiguration of open space on site development proposals, where there would be no net loss of open space provision	Do not allow for reconfiguration of open space (maintain existing configuration)

Part 1 of the DM Policies DPD SA Report is structured slightly differently to the equivalent Part within the two Interim SA Reports described above, in that a chapter is assigned to each of the 13 topics that have been a focus of alternatives appraisal.

Within each chapter, after explaining 'outline reasons for selecting the alternatives dealt with', appraisal findings are presented within a table (see above for a discussion of how the table is structured).

Conclusions of alternatives appraisal are as follows -

- **Housing conversions-** A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant.
- **Housing density and design** - Haringey is a densely populated borough (86.2 persons per hectare; well above the London average of 52) and the population is set to increase by 31,234 over the period of 2011 to 2021. This indicates that some high density housing schemes are needed, perhaps going beyond what is recommended in the London Plan. Against this background, Option 1 is seen to perform well in terms of sustainability objectives. As well as benefits in terms housing objectives, targeted high density development in Haringey is supported in terms of 'sustainable transport', 'reducing per capita carbon emissions' and 'increasing accessibility to local jobs'. However, there are risks around access to health care and community infrastructure more generally.
- **Employment sites (1)** - In an area that is constrained in terms of the availability of land for employment development and has high unemployment levels, intensifying the existing offer is an important priority to create more jobs for the growing population and to address historic local unemployment. Against this background, Option 1 is seen to perform well in terms of sustainability objectives, with significant positive effects predicted in terms of economic growth and economic inclusion. A risk is that if/when space for large floorspace uses is needed, there will not be the land available to accommodate these uses, but this is a more minor consideration given the evidence suggesting economic growth locally is considered most likely to come from B1 development.
- **Employment sites (2)** – Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.
- **Town centre uses** - The town centres in Haringey act as the focus for local convenience shopping and community facilities. Given this role, they will contribute to the vitality local communities, and also help to reduce car dependency. Protecting retail in town centres (Option 1) could help to sustain strong and vital centres in the long term; but on the other hand there are arguments to suggest that setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2). If there is greater demand for non-A1 uses than some existing A-class uses, then a restrictive policy would act to constrain the vitality of town centres, with knock-on effects. It is difficult to distinguish between the alternatives, given the changing role of town centres in society. However, it is noted that Haringey has commissioned an evidence base study which in essence says that, given the increasing population in Haringey and the likely increase in disposable income, it is likely that more retailing will be needed in the borough.
- **Negative clusters** - Overall, in terms of sustainability objectives, Option 1 is clearly best performing. No draw-backs are highlighted by the appraisal. Restricting negative clusters of hot food takeaways and betting shops would likely lead to significant positive benefits in terms of 'health', given the assumption that there would be reduced consumption of fatty foods. There would also be benefits in terms of reduced crime and antisocial behaviour, improved townscape and improved vitality in town centres.

- **Tall buildings** - Option 1 is best performing in terms of all objectives, other than those relating to 'housing'. Option 1 would restrict tall buildings to particular areas, protecting the borough's townscape and cultural heritage, while still allowing tall buildings in some areas.
- **Views and vistas** - A policy to minimise disturbance to identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough's townscape and cultural heritage resources, as compared to only protecting London Plan strategic views (Option 2). Significant positive effects are predicted in terms of townscape/heritage objectives. However, greater protection of identified local views in addition to Local Plan strategic views could place constraints on housing delivery in some areas.
- **Heritage and conservation** - A policy focus on non-designated assets in addition to designated assets (Option 1) is likely to result in significant positive effects in terms townscape and cultural heritage objectives, and it is not clear that there are any major draw-backs to this approach. There might be some negative implications for housing and economic growth, but (thinking long-term) heritage assets can help enable regeneration and create a sense of place (with positive implications for economy and community objectives).
- **Car-free or car-capped developments** - Option 1 (limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone in place or planned) is likely to have greater positive effects in terms of encouraging sustainable transport (significant positive effect), health, air quality and climate change mitigation objectives. With large scale development planned within Haringey, an integrated approach to land use and transport planning that minimises the need to travel and encourages the most sustainable travel choices could have a notable positive effect on reducing transport-related greenhouse gas emissions per capita.
- **Carbon offsetting** - A local carbon offsetting fund (Option 1) could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact on housing could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme. Given that housing quality/condition and issues around fuel poverty are important determinants of health, Option 1 could also improve health outcomes and reduce health inequalities.
- **Community infrastructure** - Community Infrastructure assets can help to enable regeneration and create a sense of place and improve people's quality of life. Haringey has existing pockets of deprivation and also areas of deficiency for different types of community infrastructure, as well as new growth in the pipeline that will need supporting infrastructure. Therefore, by locating new and enhanced infrastructure in specific locations, Option 1 is more likely to benefit existing and future residents than Option 2 which could take place anywhere in the borough. No draw-backs to Option 1 have been identified.
- **Open space provision** - Allowing the reconfiguration of open space should enable targeted improvements to be made to the open space resource in those parts of the borough where there are currently deficiencies. It is likely that the quality of open space, in terms of its potential to support recreational activity and other typical open space uses, will improve. This has positive implications in terms of a range of objectives, with significant positive effects predicted in terms of 'health'. It is also the case that targeted enhancements should enable biodiversity (Green Grid) opportunities to be realised, to a significant extent. A policy of enabling reconfiguration does, however, lead to some risks in terms of 'Townscape and Cultural Heritage' given that reconfiguration might well involve a change to the existing character of the open space. More generally, there is the possibility that reconfiguration of numerous open spaces could have unforeseen effects in the long term, and so monitoring will be important.

Each topic chapter then concludes with a section explaining the Council's reasons for selecting/developing the preferred policy approach in-light of alternatives appraisal. The text is not repeated here, for brevity.

The Tottenham AAP

Part 1 of the Tottenham AAP SA Report explains how **5 sets of alternatives** were appraised in the run-up to finalising the plan for publication.

Sets of alternatives that have been the focus of appraisal

Plan topic ¹	Option 1	Option 2
Spatial strategy	Focus at the growth areas of Tottenham Hale and North Tottenham, with some growth also targeted at the 'area of change' of Tottenham High Road and the Seven Sisters Corridor (i.e. the Council's preferred option)	As per (1), but with some additional growth targeted at the northern edge of Tottenham, and commensurately less growth elsewhere
Employment sites	Allow introduction of non-employment uses (as part of mixed use schemes) in certain designated employment locations, to cross-subsidise and enable new employment development to come forward	Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development
Town centre hierarchy	Retain / reinforce the existing town centre hierarchy, along with designating a new district centre at Tottenham Hale	Retain / reinforce existing town centre hierarchy
Building heights	A locally specific approach to building heights, including tall buildings, in the Tottenham AAP; reflecting a more proactive approach to sensitive clustering of buildings in identified sites or areas (informed by Characterisation Study and Tall Buildings Validation Study)	Apply more borough-wide development management policies for tall buildings (including in Local Plan Strategic Policies and Local Plan DM Policies)
Affordable housing	Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 60% intermediate housing (housing available at prices and rents above those of social rent but below market prices or rents) and 40% social/affordable rented housing (as per the AAP housing policy).	Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 40% intermediate and 60% social/affordable rented (as per the proposed alterations to Strategic Policy SP2 and policy DM13 of the emerging Development Management Policies).

As with the DM DPD SA Report, Part 1 of the Tottenham AAP Interim SA Report is structured so that a chapter is assigned to each of the five topics that have been a focus of alternatives appraisal.

Within each chapter, after explaining 'outline reasons for selecting the alternatives dealt with', appraisal findings are presented within a table (see above for a discussion of how alternatives appraisal tables are structured). For reasons of brevity, conclusions are not presented here.

Each topic chapter then concludes with a section explaining the Council's reasons for selecting/developing the preferred policy approach in-light of alternatives appraisal.

Specifically, the Council state that:

¹ When considering the 'plan topics' that should be the focus of alternatives appraisal, consideration was given to appraising alternative approaches to site allocation (i.e. alternative 'site packages'); however, it was determined that there was no 'reasonable' need to do so. The preferred site package has strong justification, having been developed through a preliminary screening exercise (discussed in the SA Report), and given the need to deliver on the housing and employment targets established through the Further Alterations to the London Plan (FALP) and the broad spatial strategy established by the adopted Strategic Policies and emerging Alterations.

- **Spatial strategy** – “The preferred option promotes a balanced approach to growth and development in Tottenham, in particular, a spatial scope that includes but also extends beyond North Tottenham. This option better reflects the Council's strategic regeneration objectives for the wider area, addressing local character and responding to constraints which might inhibit development of mixed and balanced communities, and taking advantage of key public transport nodes and other existing and future planned infrastructure / investment. In addition, Option 2 would require the de-designation of strategic industrial land, which, as the appraisal indicates, is likely to have significant negative effects on economic sustainability objectives. The preferred option is therefore also better placed to accommodate the quantum of planned future growth without compromising local business and employment opportunities, which are integral to Tottenham's sustainable development. A number of Regulation 18 stage consultation comments expressed concern with provision of employment land, in particular, the loss of businesses and employment opportunities. A new AAP policy NT2 reinforces the spatial strategy and objective to protect SIL in North East Tottenham.”
- **Employment sites** – “There is a need to ensure that Tottenham's employment land is maximised for the benefit of the local community and borough. Fully employment led schemes may be difficult to deliver in certain circumstances, given viability considerations. Therefore, an approach which enables the introduction of more viable mixed use development to cross subsidise employment development is preferred. This approach will assist with driving forward regeneration in the area, with multiple benefits for the area. The policy will be delivered through a limited number of site allocations, in order to ensure that employment locations and floorspace are not compromised. The policy will also work in conjunction with the DM Policies DPD.”
- **Town centre hierarchy** – “The preferred option is to maintain and reinforce the existing town centre hierarchy, along with the introduction of a new District Centre at Tottenham Hale. This option will help to ensure that the future growth and regeneration of Tottenham Hale is appropriately supported, whilst reinforcing the need to maintain the vitality and viability of Haringey's other existing centres. Existing and future transport improvements will also support the delivery of this alternative. Further, the option better positions Haringey to realise the potential of Tottenham Hale within London's wider town centre network, as reflected in the Further Alterations to the London Plan. The Sustainability Appraisal highlights the significant positive effects of progressing this approach, particularly on the objectives for economic growth, townscape / cultural heritage and sustainable transport.”
- **Building heights** – “The preferred approach is for a specific tall building policy for the Tottenham AAP, to be considered via site allocations and an area-specific DM policy, building on relevant adopted and emerging Local Plan policies. This policy option will provide greater level of control over tall buildings in Tottenham, helping to ensure they make a positive contribution to the area by being appropriately situated, in particular, responding to local character and situated in areas with good transport accessibility. The policy will also provide greater certainty for prospective developers about the locations where relevant proposals will be acceptable.”
- **Affordable housing** – “The preferred option is for a localised policy which is a variation on the emerging borough-wide policy for affordable housing tenure split. This option will assist in rebalancing the comparatively high levels of social rented accommodation in Tottenham, which equates to more than 60% of the boroughs' total social rented stock. It will ensure the most effective use the funding received to help meet housing needs in Tottenham. Whilst the Sustainability Appraisal has identified potential issues in respect of area change, it is considered that the full suite of Local Plan policies will help to increase the quantum, range and quality of housing in Tottenham to better meet a wide range of housing need. Further, increasing the amount of intermediate housing will meet the needs of those who traditionally may have sought social housing but are eligible for low cost home ownership products, which the Council is seeking to encourage in Tottenham. Finally, Local Plan policies should not result in a net loss of affordable housing floorspace, in line with Strategic Policy SP2 and the emerging DM Policies DPD.”

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 pre-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 Partial Review

The conclusion of the draft plan appraisal is as follows -

The proposed Partial Review is likely to lead to significant positive effects on the baseline situation (i.e. a situation that assumes implementation of the existing Strategic Policies – see Box 14.1) in terms of a number of sustainability issues/objectives.

The increased residential development is focused at Growth Areas and Areas of Change outlined in the adopted Strategic Policies DPD. The scale of growth creates an opportunity for investment in infrastructure in the most deprived part of the borough, which should lead to benefits in terms of a number of sustainability objectives.

The spatial approach also seeks to address housing affordability; improve the condition of housing for existing residents; support economic growth ambitions; and reduce the need to travel. The review is also likely to have significant positive effects for town centres across the borough, most notably at Wood Green given the scale of development and its role at the top of Haringey's settlement hierarchy.

No negative effects are predicted, however some uncertainties are highlighted in terms of health, community cohesion, open space and air quality. Some uncertainties exist in relation to estate renewal (through SP2), which should have a positive effect through improving conditions, but which will need to be sensitively managed. It is noted that a number of changes have been made to the policy approach to estates renewal and improvement since February 2015, in response to past SA recommendations and consultation responses.

The Site Allocations DPD

The conclusion of the draft plan appraisal is as follows -

Significant positive effects are predicted in terms of the majority of the 21 sustainability topics that have provided a framework for the appraisal. In each instance, the appraisal finds that a carefully targeted approach to site specific policy is emerging that recognises the need for individual sites to contribute to wider objectives, whether borough-wide objectives (e.g. around walking/cycling, accessibility and biodiversity) or sub-area specific objectives (notably objectives for Wood Green, Haringey Heartlands and the Haringey Warehouse District).

Under some topic headings, whilst significant positive effects are predicted overall, the appraisal also serves to identify potential draw-backs / risks or the potential for policy to 'go further'. Most notably, with regards to economic growth and economic inclusion, whilst the effect of the plan will be to support economic growth and diversification, there are drawbacks given that some industries will find it increasingly difficult to operate in Haringey. Also:

- Whilst significant positive effects are predicted in terms of 'crime' overall, further opportunities to design-out crime should be explored;
- Whilst significant positive effects are predicted in terms of 'health' overall, emerging evidence around requirements for health facilities should be taken into account;
- Whilst significant positive effects are predicted in terms of 'housing' overall, emerging evidence around Gypsy and Traveller accommodation needs should be taken into account;
- Whilst significant positive effects are predicted in terms of 'townscape and heritage' overall, there will be a need to take careful account of the potential for tall buildings to impact, including through in-combination impacts; and
- Whilst significant positive effects are predicted in terms of 'flood risk' overall, further consideration might be given to policy measures aimed at avoiding and mitigating risk.

There are no instances of the appraisal concluding significant negative effects for a sustainability topic; however, there are number of instances where it is not possible to conclude significant positive

effects. In several instances it is the case that policy requirements are broad at this stage, in the knowledge that these issues can be sufficiently addressed at the planning application stage and appropriately managed through the Borough-wide DM Policies DPD. Most notably, it is not possible to conclude significant positive effects in terms of 'accessibility' at the current time, given that the Infrastructure Delivery Plan (IDP) update is yet to be finalised and feed into site specific policy requirements around community infrastructure delivery; nor is it possible to conclude predict significant positive effects in terms of 'energy and carbon' as there is still much work to be done in order to ensure that opportunities for delivering decentralised energy networks are realised.

The DM Policies DPD

The conclusion of the draft plan appraisal is as follows –

The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with significant positive effects identified as likely in terms of: education, health, housing, community cohesion, economic growth, town centres, biodiversity, townscape and cultural heritage, open space and sustainable transport. There is, however, often a degree of uncertainty around predicted positive effects given the important role that will be played by site allocation policy (which in turn will be influenced by the emerging update to the Infrastructure Delivery Plan, IDP).

No significant negative effects are predicted, although risks associated with some policy approaches. In particular, policy approaches that will drive a considerable shift in the nature of employment land in Haringey potentially have implications for economic inclusion, although it is recognised that the Plan is set in the context of delivering the Borough's strategic employment target. Objectives around 'energy and carbon' and 'open space' are notable in that there is the theoretical potential to do more (in order to meet carbon reduction standards; and reduce open space deficiencies), but it is recognised that in practice there is no potential to set more stringent policy without compromising other objectives, which are a priority locally (i.e. objectives around housing, regeneration and employment growth), and ensuring consistency with national and regional policy.

There were a limited number of recommendations made in the Interim SA Report (2015), where the appraisal highlighted a small number of instances where the plan might potentially reword or elaborate on policy wording for particular sustainability issues, and this report has noted where amendments to the Plan were subsequently made. No specific recommendations remain outstanding.

The Tottenham AAP

The conclusion of the draft plan appraisal is as follows –

The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with 'significant' positive effects identified as likely in terms of: health, housing, community cohesion, accessibility, town centres and economic growth.

A potential negative effect (relative to the baseline of 'no plan') is identified on flood risk, though the significance of the effect is uncertain. Flood risk policy in the DM Policies DPD should mitigate this effect to a large extent.

It is also important to point out that, whilst positive effects are generally predicted in terms of socio-economic issues/objectives, some risks are also highlighted. Specifically, there is a risk that development consistent with the proposed plan policies could lead to some disruption to existing communities. There is also a risk that some existing business sectors could be impacted by the policy focus on employment site renewal.

The appraisal has highlights a number of instances where policy approaches or wording in the plan were amended, following on from public consultation responses and findings of the Interim SA report. It is noted that a considerable amount of work has gone into strengthening the policy approach in relation to biodiversity (Green Grid) and townscape / heritage / character. However, it is considered there remain some opportunities to further refine policies in order to minimise the negative and strengthen the overall positive effects of the plan.

WHAT ARE THE NEXT STEPS?

For each of the four plans:

Subsequent to publication of the Pre-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).

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'.

Monitoring

At the current time, there is a need only to present 'measures envisaged concerning monitoring'. In-light of appraisal findings (i.e. predicted effects and uncertainties), the SA Reports explain that monitoring efforts might focus on:

- The effect of estate renewal on existing communities / community cohesion
- The shift in employment types within localities
- The mix of affordable housing
- Gypsy and Traveller accommodation needs
- Increase in population within areas of high/low PTAL
- Building heights in the vicinity of heritage assets
- The legibility of historic character
- The way in which schemes seek to contribute to / make use of decentralised energy
- Flood risk mitigation measures implemented
- Use of green spaces and the Lee Valley Regional Park
- The length of the Moselle river that is culverted
- Use of green spaces and the Lee Valley Regional Park
- Green roofs / living walls and other sustainable design measures implemented.



Sustainability Appraisal (SA) of the Strategic Policies Alterations

SA Report

Published alongside the pre-submission version of the plan

November 2015



Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	SA Report published alongside the pre-submission version of the Strategic Policies Partial Review	Mark Fessey, Principal Consultant	Steve Smith, Technical director	Steve Smith, Technical director

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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' issues¹), 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 **Table 2.1** explains more about the regulatory basis for answering these 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 other 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)

Table 2.1: Questions answered by this SA Report, in-line with Regulatory⁵ requirements

PRIMARY QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What has plan-making / SEA involved up to this point? [See Part 1 , below]		- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SEA findings at this current stage? [See Part 2 , below]		- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next? [See Part 3 , below]		A description of the monitoring measures envisaged
OTHER QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What's the plan seeking to achieve?		An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What's the scope of the SEA?	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment

N.B. The right-hand column of Table 2.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

Also, **Appendix II** presents supplementary information (in the form of a checklist) to further explain how/where regulatory requirements are met within this report.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

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; the London Plan (2015), 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.

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 III**.

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.⁶
- 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.

⁶ 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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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?

4.3 A note on 'equalities' and 'health' considerations

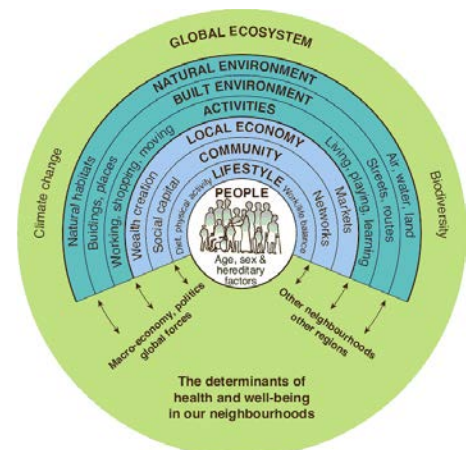
4.3.1 Equality and health considerations were a focus of SA scoping work. As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence the SA process 'integrates' Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). **Appendix IV** signposts to areas within this report where EqIA and HIA has 'fed-in'.

Box 4.1: EqIA and HIA

The Council has 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**, 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.

Determinants of health and wellbeing in our neighbourhoods, from Barton & Grant (2006)



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

Chapter 7 - Presents appraisal findings in relation to reasonable alternatives

Chapter 8 - 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.⁷

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

5.1.4 In addition to alternatives appraisal, development of the draft (pre-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.

⁷ 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:

- The 2011 Census, which set out higher than previously projected population growth figures for London, prompting the Mayor of London to prepare and subsequently adopt the Further Alterations to the London Plan (FALP) that significantly increased Haringey's -
 - housing target - from 820 to 1,502 homes per annum (an 83% increase); and
 - employment target - 22,000 additional jobs 2011-2036 (a 30% 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.
- 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 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 housing land availability (through the London-wide SHLAA). These new and updated studies inform understanding of site development capacities, the local economy and demands for various land uses.
- The new Housing Zone designation 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 consider integration with its comprehensive regeneration framework for the area and a dedicated Area Action Plan.
 - The Tottenham Housing Zone was designated on the basis that: *"This area of Haringey is one of the capital's big growth opportunities. Ambitious regeneration plans supported by a Housing Zone will see 10,000 new homes built and 5,000 new jobs created by 2025. The Zone will offer opportunities to build almost 2,000 new homes around and on top of a redeveloped Tottenham Hale station and open up the Lee Valley Regional Park with two new bridges."*⁸

- 6.2.2 In light of these changes, there is a need to:

- Make a range of factual updates to the Strategic Policies, with a view to bringing the DPD up to date and ensuring consistency with the current national and regional planning position; and
- Establish how best to deal with significantly increased housing and employment targets for Haringey.

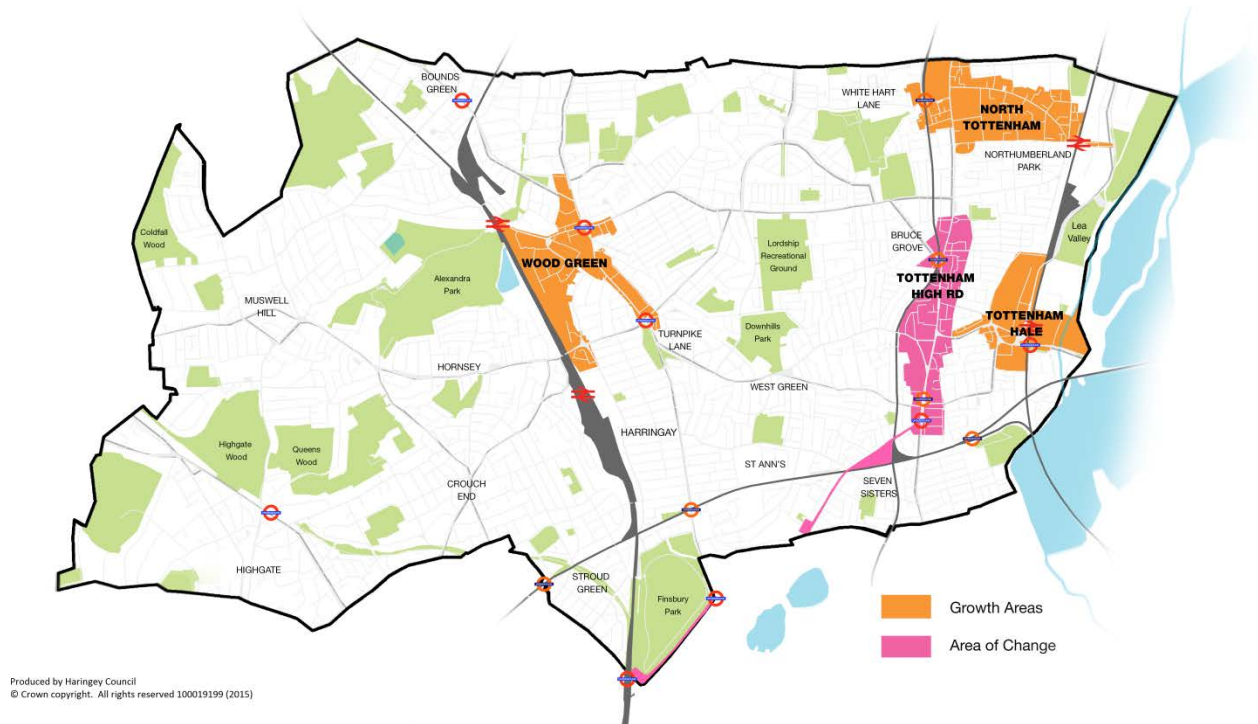
- 6.2.3 It is the second matter that ('reasonably') must be the focus of alternatives appraisal.

⁸ See <https://www.london.gov.uk/media/mayor-press-releases/2015/02/mayor-names-londons-first-housing-zones> (accessed 11/15)

6.3 Identifying alternatives

- 6.3.1 The default approach is to apply the higher growth figure (1,502 homes per annum) to a the spatial strategy established in the adopted Strategic Policies, with minor updates to selected Growth Areas / Areas of Change to reflect new evidence on site capacity. This spatial strategy is depicted in **Figure 6.1**.

Figure 6.1: The 2013 spatial strategy, updated to reflect new evidence on site capacity



- 6.3.2 Through discussions with the Council two other options were established, so that the reasonable alternatives are as follows –

- Option 1 -** The 2013 spatial strategy in the adopted Strategic Policies document, with updates to selected Growth Areas / Areas of Change, reflecting new evidence on site capacity (see **Figure 6.1** above).
- Option 2 - Dispersed growth** with each ward taking a roughly equal share of the additional housing (i.e. the additional 682 homes per year) above and beyond the existing spatial strategy.
- Option 3 - Town centre and Crossrail 2 focused growth**, with the additional housing (i.e. the additional 682 homes per year) focused at hubs in and around all town centres and Crossrail stations.

- 6.3.3 These alternatives were previously a focus of appraisal and consultation in February 2015. No other spatial distribution options were suggested through the February 2015 consultation (although numerous comments were received with respect to the preferred strategy).

What about alternative growth quanta?

- 6.3.4 A large number of Regulation 18 stage consultation comments were received on the uplift in housing growth that needs to be managed within the borough as a result of the updated London Plan (2015). Those representing the development industry and landowners, as well as the statutory bodies, welcomed the fact that the Council had chosen to undertake a partial review of its Strategic Policies DPD to take account of the new strategic housing requirement. Conversely, a number of local residents and resident groups were concerned with the ability of the borough to accommodate and manage growth of this level. Having now been adopted, the borough housing figures in the 2015 London Plan are a key tenet of the regional spatial strategy for the Capital, and Haringey's Local Plan must give effect to this to be considered 'sound'. As there is no scope to reduce the housing figure, it is not considered appropriate to test alternative scenarios in this regard.

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

- 6.3.5 In addition to alternatives appraisal, development of the draft (pre-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 current draft plan.

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

- 7.2.1 For each of the options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping as a methodological framework.
- 7.2.2 **Red shading** is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text (although this can create tensions with the desire to ensure conciseness / accessibility).
- 7.2.3 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible make a distinction in terms of 'significant effects'.
- 7.2.4 Effects are predicted taking into account the criteria presented within Regulations.⁹ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity that is outside the control of the Strategic Policies).
- 7.2.5 Finally, it is important to emphasise that the approach taken strikes a balance between the desire to ensure rigorous and systematic analysis on the one hand, and ensure conciseness / accessibility on the other. Where an issue, or an effect characteristic, is not referenced, the implication is that there is no point to be made that warrants a mention, given the desire to be concise. That is not to say that the issue/characteristic has been entirely overlooked as part of appraisal. Similarly, the 'significance' of effects is only discussed in instances where a clear conclusion can be reached (or there is some uncertainty).

⁹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

7.3 Appraisal findings

- 7.3.1 Detailed alternatives appraisal findings are presented within **Table 7.1**, with summary findings then presented in **Table 7.2**.
- 7.3.2 The appraisal methodology is explained above, but to reiterate: For each topic / row, the performance of each scenario is categorised in terms of 'significant effects (using **red** / **green**) and also **ranked** in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 7.1: Spatial strategy alternatives appraisal findings

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Crime	Compared to other London boroughs, crime levels in some areas are high in Haringey with residents concerned about safety, gang activity and high crime rates. Northumberland Park is considered particularly vulnerable for crime. As all three options involve significant regeneration of Northumberland Park all are considered likely to have similarly positive effects on crime. However, effects are not considered likely to be significant given the limited extent to which the planning system can influence crime and anti-social behaviour.	=		
Education	Educational attainment in Haringey is improving, but it remains below London levels. 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. It is clear that the high level of housing growth being planned for the borough will require new and improved provision of educational facilities. Options 1 and 3 should better ensure high quality educational facilities are accessible to residential areas (including deprived areas in the east of the borough). This is on the basis that housing growth would be more spatially focused, thus facilitating the provision of educational facilities in these growth areas (supported by the pooling of s106/CIL contributions from these residential developments). In contrast Option 2 would spread housing development and thus educational demand more widely; it is assumed this demand would be more difficult to meet cost effectively as it would require additional capacity in a large number of spatially distributed schools (some of which may have limited scope for expansion). The significance of the effects on this objective are uncertain as access to educational facilities will depend on many other factors (e.g. availability of funding for educational facilities and timely provision of additional capacity to ensure that educational access is not actually reduced due to a lack of capacity as housing numbers and thus demand grow).	★ 1	2	★ 1

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Health	Health inequalities in Haringey are marked; the most deprived areas in the east of the borough tend to experience the poorest health with a nine year gap in life expectancy for Tottenham compared with the rest of the Borough. Improving health and addressing health inequalities requires a targeted approach to addressing the wider determinants of health (e.g. access to green space and healthy food, air quality, housing, employment) as well as improved access to health services. All options will contribute to improved health and reduced health inequalities to the extent that they improve access to high quality housing, including for the poorest (although the baseline of 'no plan' would also involve this growth given the housing target in the Further Alterations to the London Plan). Option 1 and 3 should better ensure new and improved health facilities are accessible to residential areas (including deprived areas in the east of the borough) because housing growth would be spatially focused, thus facilitating the provision of such facilities in these growth areas (supported by the pooling of s106/CIL funding from these residential developments). In contrast Option 2 would spread housing development and thus health demand more widely, making it harder to address. Given the baseline situation, significant effects are predicted.	★1	2	★1
Housing	Affordability of housing is a significant issue in the borough. Social rented housing in the east of the borough, with substandard rented housing concentrated in Bruce Grove and Northumberland Park. While all options involve the development of the same quantum of new housing, Option 1 concentrates most new housing in Bruce Grove and Northumberland Park as it applies the higher growth figure to the existing spatial strategy which includes Areas of Change focused on Bruce Grove and Northumberland Park (moreover the proposed review would involve upgrading North Tottenham, which includes Northumberland Park, to a growth area based on new evidence of capacity). Option 1 should therefore support substantial improvement of the quality of housing in these two areas of need (and should also help to address related issues such as overcrowding and poor design and layout). Significant positive effects are predicted. With regards to Option 2, it is appropriate to conclude significant negative effects, as there are major uncertainties around deliverability. In practice there may be insufficient sites in some wards for every ward to take a roughly equal share of the additional housing. In contrast, Option 1 is supported by evidence of site availability and capacity. With regards to Option 3, there are also some risks around deliverability given uncertainties around Crossrail 2 and the sites that will be available for housing.	★1	3	2

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Community Cohesion	The Tottenham riots of 2011 highlight the need for greater community cohesion in this area in particular. All three options would involve significant housing growth in Tottenham, with Option 1 proposing the most. The aim is for housing growth to stimulate regeneration, with the effect in the medium to long term that stable and cohesive communities develop. However, there are risks as area change could bring some disruption to existing communities. Redevelopment and re-provision, such as with estate renewal, should be undertaken sympathetically and collaboratively with the local community. There is an opportunity for new development to deliver improved community infrastructure as part of regeneration proposals; however effects across all three options are uncertain at this stage.		=	
Accessibility	Access to cultural and leisure facilities and to essential services (banking, health, education) varies between neighbourhoods. If it is assumed that most cultural and leisure facilities and essential services are located in or near town centres then Option 3 would be considered the preferred option as this most concentrates housing in such locations, thereby doing most to improve access. Option 1 also has a significant focus on town centres and high areas of PTAL and is thus ranked a close second; whilst Option 2 would disperse housing most and thus would potentially result in the development of some housing with poor access to cultural and leisure facilities and essential services. As with the discussion above under the 'health' heading, it is appropriate to conclude 'significant' effects, given the issues that exist.	2	3	★1
Economic Growth	High and increasing unemployment is perhaps the greatest challenge facing the borough; Tottenham has some of the highest levels of unemployment in London and the UK. All options should, through increasing the number of residents, generate new demand and thus new employment opportunities (although the baseline of 'no plan' would also involve this growth given the housing target in the Further Alterations to the London Plan). It is not considered that the alternatives would have a marked differential impact on this objective. Employment policies will have a much greater and more direct impact on local economic growth.		=	
Skills and Training	The alternatives have little bearing on this topic as they focus on housing delivery rather than skills and training. However it may be possible to secure skills and training benefits for local people through the construction process.		n/a	
Economic Inclusion	Assuming that existing and new jobs are concentrated in town centres and strategic industrial locations, then Options 1 and 3 perform best as new homes would be concentrated to a greater extent in and around these areas. Significant effects are unlikely as other factors - e.g. policies on protection and enhancement of employment uses - are overriding.	★1	2	★1

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Town Centres	Housing under all three options would support the viability and vibrancy of town centres (including at the new Tottenham Hale district centre; assuming core retail and services are not displaced). However, Options 1 and 3 perform best as more homes would be delivered near to town centres. Options 1 and 3 would likely lead to significant positive effects, assuming new housing will be of high quality and will contribute to promoting town centres.	★1	2	★1
Biodiversity	The Lee Valley Regional Park straddles the eastern boundary of Haringey although access is a significant problem. The borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance (SINCs), which are spread across the borough. Developing new housing on sites near to SINCs would allow residents to access green spaces and biodiversity; on the other hand it could negatively impact biodiversity through building impacts (e.g. overshadowing of green spaces, light/noise disturbance to wildlife) and/or increased disturbance as a result of increased use of such spaces by a growing local population. The dispersed growth scenario (Option 2) might mean less flexibility to locate housing where it would not negatively impact on biodiversity, but the baseline of 'no plan' would also involve this same level of growth given the housing target in the Further Alterations to the London Plan so the effect is uncertain. Overall there is considered to be insufficient information to judge the relative performance of the alternatives on biodiversity, and there can be no certainty with regards to significant effects.	=		
Townscape and Cultural Heritage	Haringey has significant heritage assets including many Listed Buildings and 29 Conservation Areas which are distributed across the borough. Housing redevelopment can provide opportunities to preserve and enhance heritage assets and their settings (e.g. by re-establishing building lines), and there is the potential to deliver on this objective in the east of the borough. However, the scale of regeneration proposed will need to be carefully managed to ensure that existing assets and conservation areas are treated sensitively. In the west of the borough, which would see increased growth under Option 2, the nature of the townscape within town centres and Conservation Areas means that heritage assets are more sensitive to development, and higher buildings in particular. Option 2 could potentially lead to significant negative effects, although there is uncertainty. Option 3 promotes development at all town centres; and has the potential to have some negative effects in areas under Option 2; but as the scale of development in such areas would likely be less than under Option 2.	★1	3	2

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Open Space	The Lee Valley Regional Park straddles the eastern boundary of Haringey although access is a significant problem. Haringey also has a number of important green open spaces distributed across the borough from Highgate Woods in the west to Bruce Castle Park in the northeast. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The impacts of the alternatives on addressing these deficiency areas is somewhat uncertain (e.g. connectivity to existing open spaces could be enhanced through housing redevelopment and associated wider regeneration in these areas, on the other hand the pressure for housing delivery could further erode open space provision); however, assuming that the existing spaces are well protected and will not be significantly eroded by housing development, it is possible to conclude that the alternatives would have little impact on this objective (recognising that the baseline situation is one whereby housing would come forward in any case, in-line with the London Plan).	n/a		
Water Resources	The significant levels of housing growth proposed will result in increased water demand and potentially also increased risks to ground and surface water quality from development. However the level of housing growth is a given as a result of the revised housing target for Haringey in the Further Alterations to the London Plan. It is not considered that the alternatives would have a marked differential impact.	n/a		
Soil and Land Quality	Development under any option is likely to be on brownfield land as growth areas and change areas are located in existing densely built areas and green space in Haringey covers a small part of the total area and is protected by various designations. All three options are therefore considered likely to result in negligible effects on the land baseline in terms of encouraging the effective use of land through the development of brownfield land.	n/a		
Flood Risk and Climate Change	The main source of flood risk within the borough is the River Lee; there is also some risk from surface water and groundwater flooding. Notably, Tottenham Hale has more than 50% of the ward lying within Flood Zone 2; and parts of the east side of the Northumberland Park growth area lie within Flood Zone 2. It is therefore considered that Option 1 performs worst as it concentrates most housing growth in Tottenham Hale and Northumberland Park. There are not likely to be significant negative effects however, given existing flood risk policy in the NPPF, London Plan and adopted Strategic Policies document. There is good potential to implement mitigation measures (e.g. the emerging DM Policies DPD includes policies on flood risk management and drainage).	2	★1	★1
Air Quality	The area suffers poor air quality, primarily because of traffic congestion. Improving air quality is a challenge, particularly	n/a		

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
	along major roads. While some options may concentrate growth more in certain locations than others, whether or not this is positive or negative for overall air quality impacts is unclear. Concentrating growth could concentrate emissions to the air and thus pollutant concentrations; conversely concentrating growth can support improved public transport thus potentially reducing transport emissions per capita. On balance, there is unlikely to be an effect on the baseline (which would involve housing growth in-line with the London Plan) under any option.			
Noise	There is little baseline data available to inform the appraisal, however anecdotal evidence suggests concentrations of noise exist along transport corridors. While some options may concentrate growth more in certain locations than others, there is no potential to suggest that any option would involve concentrating growth at noisier locations.		n/a	
Energy and Carbon	Haringey is planning to develop decentralised energy networks to supply energy efficiently to buildings in Tottenham Hale and Northumberland Park, the latter connecting to an energy centre in the new Meridian Water development in Enfield (decentralised energy 'connection zones' are identified in the Development Management Policies document). As Option 1 involves the highest levels of development in these areas it was considered that it would benefit most from these decentralised energy networks in terms of securing a low carbon source of heat for new and existing buildings and potentially helping to reduce carbon emissions per capita. Option 3 was considered the next best performing against this objective as concentrating development in town centres and close to Crossrail stations should help to create heat demand clusters thereby facilitating the development of new decentralised heat networks. The more evenly distributed growth in Option 2 would be least amenable to supporting development of decentralised energy networks. Carbon savings from measures such as renewable energy generation on new homes (the opportunities for which are assumed to be the same for all options) and decentralised energy may be cancelled out by the substantial increase in population being planned for, possibly resulting in a net increase in energy and carbon emissions over the plan period, however it must be born in mind that the baseline of 'no plan' would involve similar levels of growth given the housing target in the Further Alterations to the London Plan. Wider factors will also have a significant bearing on net emissions, such as tightening of the energy efficiency standards for new homes (in the Building Regulations), however these changes will apply equally to all three options and the baseline scenario.		3	2

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Waste Management	Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and 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. It is judged that the alternatives would have little differential impact on waste generation and management relative to each other (therefore all are rated equally) and relative to the baseline of 'no plan' (as this would involve similar levels of growth given the housing target in the FALP). Strategic Policies, DM policies and emerging North London Waste Plan policies on waste and recycling will have a far greater effect on this objective.		n/a	
Sustainable Transport	Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes; Tottenham Hale provides particularly strong connections with underground and rail links. 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. By concentrating more growth in Tottenham Hale and close to planned Crossrail 2 stations Options 1 and 3 best support access to these existing and emerging public transport links. However this is based on the assumption that the significant growth planned in these areas is sequenced to coincide with the development of enhanced transport links; if large scale development were to occur close to Crossrail stations but in advance of Crossrail being implemented, this could lead to major congestion and constrained access to public transport services. The more focused growth and regeneration proposed in Options 1 and 3 may also better enable the development of improved cycling and walking routes, reducing the need to travel by car or public transport for shorter trips. Significant positive effects are predicted under Options 1 and 3, contingent on Crossrail 2 coming online.	★ 1	2	★ 1

Table 7.2: Spatial strategy alternatives appraisal findings - Summary

Relevant sustainability topics	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Crime	=		
Education	1★	2	1★
Health	1★	2	1★
Housing	1★	3	2
Community Cohesion	=		
Accessibility	2	3	1★
Economic Growth	=		
Economic Inclusion	1★	2	1★
Town Centres	1★	2	1★
Biodiversity	=		
Townscape and Cultural Heritage	1★	3	2
Flood Risk and Climate Change	2	1★	1★
Energy and Carbon	1★	3	2
Sustainable Transport	1★	2	1★

Option 1 and 3 perform equally well in terms of a number of objectives. In terms of 'health', 'town centres' and 'sustainable transport' significant positive effects are predicted and there is little to differentiate between the two options. Options 1 and 3 are also anticipated to have significant positive effects in terms of 'accessibility' related objectives, although in this instance the appraisal suggests that Option 1 is preferable.

Option 1 would also likely lead to significant positive effects in terms of housing and energy/carbon; however, it should be noted that under Option 1 there is the greatest likelihood of worsening flood risk locally, given that housing would be concentrated in flood zone 2. The appraisal also highlights some potential risks around 'community cohesion' under Option 1, and identifies the importance of taking this into account when planning for and implementing development consistent with the plan policies, in Tottenham in particular.

No significant positive impacts are identified for Option 2 (Dispersal), reflecting the fact that considerable opportunities would be missed through an approach that distributes growth. Significant negative effects are predicted in terms of 'health' and 'accessibility', given the challenges that would likely arise around infrastructure delivery. Significant negative effects are also predicted in terms of townscape / cultural heritage, although there is some uncertainty in this respect.

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

- 8.2.1 The preferred approach is to apply the higher growth figures to the spatial strategy established in the adopted Strategic Policies DPD, with updates to selected Areas of Change / Growth Areas, reflecting new evidence on site capacity. This option ensures the spatial strategy for Haringey remains consistent with the approach previously developed through extensive consultation with the local community and other stakeholders, as well as through an iterative process of Sustainability Appraisal. The option is considered to be the most sustainable and deliverable of the alternatives considered, in particular given: the existing distribution of sites across the borough which are capable of accommodating future growth, taking account of development constraints, such as significant open spaces and sites of ecological importance; its capacity to both optimise and facilitate focused provision of infrastructure, services and facilities to support growth; and its conformity with the spatial development strategy for London and alignment with the Council's key regeneration objectives, with a focus on areas of need. Further policies, such as Development Management Policies and Site Allocations, will give effect to the spatial strategy and appropriately address matters raised in the SA (e.g. flood risk) through site specific requirements. The SA finds the preferred approach to perform well against alternatives, with likely significant positive effects across a range of sustainability 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 'pre-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

- 10.2.1 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach – i.e. the proposed Partial Review - on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

• Crime	• Economic inclusion	• Flood risk and climate change
• Education	• Town centres	• Air quality
• Health	• Biodiversity	• Noise
• Housing	• Townscape and cultural heritage	• Energy and carbon
• Community cohesion	• Open space	• Waste management
• Accessibility	• Water resources	• Sustainable transport
• Economic growth	• Soil and land quality	
• Skills and training		

- 10.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.

- 10.2.3 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

- 10.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹⁰ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

10.3 Crime

- 10.3.1 Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. Essentially, issues relate to designing development that reduces levels of crime and the fear of crime as well as levels of anti-social behaviour. There is a need to address unemployment in order to tackle rates of acquisitive crime (domestic burglary, theft of a motor vehicle, theft from a motor vehicle and robbery of people or business).
- 10.3.2 The **2011 Strategic Policies SA Report** did not identify the likelihood of the Strategic Policies leading to significant effects, but did find that SP11 (Design), which proposes “Secured By Design” principles for new developments, SP1 (Managing growth) and SP10 (Town Centres) could indirectly contribute to this SA Objective by including housing in town centre expansion and intensification. Providing housing in town centres could increase natural surveillance, particularly in the evenings, which could deter crime.
- 10.3.3 The **Partial Review** proposes a significant increase in development in the centre and east of the borough which is where crime rates are the highest in the borough. A higher scale of development, particularly in North Tottenham and Northumberland Park, should have positive effects if delivered in-line with Secured by Design principles (SP11). Furthermore, a greater mix of uses in town centres should encourage activity throughout the day and into the night whilst also encouraging natural surveillance and overlooking of public areas.
- 10.3.4 Revised policy SP2 (Housing) provides greater support for strategic improvements to estates, or their renewal, which could lead to benefits in more disadvantaged parts of the borough. The housing estate improvement and renewal programme can facilitate physical improvements to estates that are poorly laid out, an issue that continues to hamper efforts to address localised problems of anti-social behaviour (as well efforts to improve access to public transport, and create better and more useable amenity spaces).
- 10.3.5 The proposed review provides for greater employment opportunities and employment densities to be delivered through the Site Allocations DPD and the Tottenham AAPs; as well as increasing employment in Wood Green. This should help to reduce acquisitive crime in the centre and east of the borough by improving job prospects locally.
- 10.3.6 SP16 (Community Facilities) requires new development to deliver new or contribute towards the required supporting infrastructure alongside new development. An increased scale of development has the potential to lead to increased provision of such facilities; which should lead to improved access to facilities for young people to engage in leisure activities and community activities. This has the potential to reduce anti-social behaviour by providing additional activities for young people.
- 10.3.7 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to be beneficial in terms of reducing crime and the fear of crime; however, significant effects are not predicted. Design of new development and improved local employment prospects are amongst many things that affect crime rates.

10.4 Education

- 10.4.1 There is a need to increase participation and attainment in education for all, not least by improving access to education and training facilities. School attainment in the area is significantly below the London average, with children and young people who live in the more deprived areas of Haringey (e.g. White Hart Lane, Northumberland Park and Seven Sisters) tending to have a lower level of achievement than those from more affluent backgrounds further to the west. As the population grows more school spaces will need to be created.

- 10.4.2 The **2011 Strategic Policies SA Report** did not identify the likelihood of the Strategic Policies leading to significant effects, but did find that educational facilities are to be provided under SP16 (Community Infrastructure) and SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion). Also, SP1 (Managing growth) will ensure that new facilities are provided in growth areas; and SP7 (Transport) will have an indirect positive contribution by improving access.
- 10.4.3 Focusing on the proposed **Partial Review**, an increase in the local population (though SP1) will require a commensurate increase in education facilities to support the additional residents through Policy SP16. A greater number of new and expanded schools would likely improve the quality and accessibility of provision; particularly in areas that have lower educational provision in the east of the borough around Northumberland Park and Seven Sisters.
- 10.4.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review could potentially lead to an increased scale of development and focus on areas of lower educational attainment, which in turn might lead to significant positive effects on the education baseline; however the nature of the effect is largely dependent on the emerging Infrastructure Delivery Plan (IDP), the Tottenham AAP and Site Allocations DPD.

10.5 Health

- 10.5.1 There is a need to improve access to health services, extend life expectancy and improve wellbeing, including by increasing access to open spaces and sports facilities. High levels of deprivation in the area are linked to health and wellbeing challenges e.g. high rates of obesity. Access to GPs is significantly poorer in the east of the borough than in other parts of Haringey and when combined with the level of planned growth in Tottenham this necessitates a need for development of additional health infrastructure.
- 10.5.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through improved health facilities (SP14) and also noted the potential for positive effects through SP2 (Housing), 11 (Design), 13 (Open Space and Biodiversity), SP14 (Health and Well-being), SP15 (Culture and Leisure) and SP16 (Community Infrastructure).
- 10.5.3 The increase in development under the proposed **Partial Review** will result in an improvement in quantity and accessibility of GP services through SP16; particularly in the more deprived areas to the centre and east of the borough which is a focus of growth.
- 10.5.4 Accessibility to open space is an issue with development being delivered in the east of the borough where there is generally worse accessibility to open space (notably at Northumberland Park and Bruce Grove). Overcrowding at open space could be an issue; although these areas will also have improved access to the Lee Valley Regional Park.
- 10.5.5 The proposed spatial strategy focusses new development at areas within and adjacent to town centres; which should help to increase uptake in active travel (walking and cycling). Also, investment in leisure and community facilities (SP16) should help improve accessibility to opportunities for exercise and also improve mental well-being through increasing the ability to join social gatherings and maintaining social networks; helping to combat isolation and build social capital. These connections should prove particularly beneficial in Haringey where the local population is so transient.
- 10.5.6 A new commitment to estate renewal and improvement in SP2 has the potential to improve the quality of the dwelling stock in deprived areas; which may help to improve the health of residents; reduce overcrowding and increase life expectancy.

- 10.5.7 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to enhance the already significant positive effects of the Strategic Policies. The nature of the effect is, however, dependent on the Infrastructure Delivery Plan (IDP), Tottenham AAP and Site Allocations DPD.

10.6 Housing

- 10.6.1 There is a need to provide greater choice, quality, quantity and diversity of housing across all tenures to meet the needs of residents. This will involve refurbishing existing stock (many existing homes do not meet required standards of decency) as well as developing new supply. The aim is to create more mixed communities that have a balance of different types of housing which offer quality, affordability and sustainability (Haringey's Housing Strategy 2009-19). Affordability of housing is also a significant issue in the area. Over 60% of all social housing in the borough is located in the Tottenham wards. High levels of homelessness and overcrowding are also significant issues.
- 10.6.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through increased housing development (SP2 and SP10) and also noted that SP2 (Housing) provides for maximising housing provision and providing to meet different housing needs. Furthermore, SP1 (Managing Growth) directs growth, which includes housing, to areas of opportunity and deprived areas (Tottenham Hale, Seven Sisters Corridor and Northumberland Park); and SP10 (Town Centres) seeks to provide housing through town centre expansion and intensification. In combination, these policies will contribute to the achievement of housing objectives in the borough.
- 10.6.3 The proposed **Partial Review** seeks to deliver a higher quantum of housing in order to meet identified needs in the London Plan; increasing the strategic delivery target from 8,200 to 19,802. This should have a positive effect in comparison to the existing Strategic Policies as it ensures that sufficient housing will be delivered to meet demand; with commensurate benefits in terms of addressing affordability, overcrowding and the condition of the existing dwelling stock.
- 10.6.4 New housing is focused on the east and centre of the borough where housing affordability and the quality of the existing dwelling stock is at its lowest. Estate renewal and improvement (SP2) and town centre intensification (SP1) has the potential to increase housing delivery in accessible locations where residents are able to access employment opportunities.
- 10.6.5 Importantly, there is a commitment to ensuring no loss of social housing floorspace through the estate renewal programme, and a commitment to rebalancing the supply of social housing, ensuring that the acute need for family housing is better addressed. This policy approach is largely in-line with a **recommendation** made within the February 2015 Interim SA Report (*"The policy might be strengthened to state that estate renewal schemes should, subject to viability considerations and creating mixed and balanced communities, seek to achieve 'no net loss' in affordable housing"*). Also, it is noted that supporting text now responds to a second **recommendation** from February 2015 (*"The Council should ideally develop an approach collaboratively with local residents and stakeholders to help ensure that existing communities are not adversely affected; and that residents have a say in shaping regeneration efforts"*), with supporting text now committing to appointing an independent advisor who can advise residents on rights and options at all stages of the renewal process.
- 10.6.6 The review is set to alter the policy approach to affordable housing, with the threshold decreased from 50% to 40% on sites over 10 dwellings (based on updated viability evidence). Although the affordable housing threshold has been reduced, the corollary of this is that a greater number of developments are now likely to be viable and deliverable which, when combined with the overall increase in the housing quantum through the proposed review, would lead to a significant increase in the absolute number of affordable housing delivered during the plan period when compared to the existing Strategic Policies.

- 10.6.7 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to have a **significant positive effect**. There remain some uncertainties in the appraisal regarding the implications of estate renewal for certain sectors of the community; however, it is recognised that the Council has responded to consultation responses and past appraisal findings, and amended the preferred approach accordingly in order to achieve the best outcomes.

10.7 Community cohesion

- 10.7.1 There is a need to promote a sense of community belonging and spirit, including by supporting relationships between people from different backgrounds and community groups. Tottenham is one of the most ethnically diverse areas in the country and has a relatively transient population. Over three quarters (78.9%) of the population have a non-White British ethnic group, compared to 55.1% for London. There are some 200 different languages spoken in Tottenham. The Haringey 'Sustainable Community Strategy 2007-2016' sets out an ambition to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.
- 10.7.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through reduced social exclusion and inequalities, and improved access to services and amenities (SP2, SP10, SP15 and SP16). It also noted that: SP1 (Managing Growth) and SP16 (Community Infrastructure) provide for community facilities; SP15 (Culture and Leisure) promotes cultural venues; SP11 (Design) may help improve community identity; and SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion) may have an indirect effect on community cohesion by providing the skills necessary for local residents to obtain employment.
- 10.7.3 By significantly increasing the housing quantum in Haringey the proposed **Partial Review** will also require, through SP15 and SP16, greater investment in leisure and community facilities. This will likely help to increase opportunities for exercise and also improve mental well-being through social gatherings and maintaining social networks; helping to combat isolation and build social capital. This has the potential to help create a sense of community where such community infrastructure is delivered; which is a particular issue in Haringey due to the transient population.
- 10.7.4 Estate renewal and improvement (SP2) has the potential to affect residents in deprived areas in the centre and east of the borough; and potentially minority communities. The process of redevelopment and re-provision needs to be sensitively managed and to this end it is noted the policy wording has been notably strengthened since February 2015, with supporting text now committing to appointing an independent advisor who can advise residents of their rights and options at all stages throughout any given renewal process. There is also a signpost to the Council's Housing Strategy, where options available to existing tenants and leaseholders are outlined.
- 10.7.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to improve provision of community facilities which will increase the potential for community cohesion, and with regards to estate renewal it is clear that the Council has responded to consultation responses and past appraisal findings, and amended the preferred approach accordingly in order to achieve the best outcomes. It is now possible to predict **significant positive effects**.

10.8 Accessibility

- 10.8.1 There is a need to improve access to essential services and amenities for all groups, including cultural, health and leisure facilities. Access to GPs is particularly poor in the area and the level of planned growth in the borough means a need for additional infrastructure.

- 10.8.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through improved access to services and amenities (SP1, SP7, SP10, SP13, SP15 and SP16). It also noted that SP1 (Managing Growth) focuses development in Tottenham Hale (Area of Opportunity), Haringey Heartlands (Area of Intensification), Seven Sisters and Wood Green Metropolitan Town Centre, where there are existing services and amenities and where regeneration plans would provide for additional services. Other policies identified as likely to contribute to this SA Objective were: SP13 (Open Space and Biodiversity), which provides for improvements to green spaces; SP16 (Community Infrastructure), which will ensure that community, health and education are provided to meet needs; and SP10 (Town Centres), which should ensure residents have access to services in these centres.
- 10.8.3 The proposed **Partial Review** (through SP1) will have the effect of increasing the annual housing target from 820 homes over the plan period to 820 homes for the period 2011/12 to 2014/15 and 1,502 homes from 2015/16 to 2025/26; focussing development in accessible town centre locations and areas of high PTAL; and increasing the quantum of supporting infrastructure delivered (SP16). Through focusing on Wood Green, the Seven Sisters Corridor, Tottenham and town centres this is likely to have a proportionately greater benefit than if development were elsewhere. This should help to improve access to town centre facilities and community infrastructure for existing and future residents. Additionally, further town centre services are likely to be more viable due to an increase in the local population; which could increase the accessibility to a variety of services available locally.
- 10.8.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review will likely lead to **significant positive effects**; however it should be noted that the significance of the effect is largely dependent on the content of the Infrastructure Delivery Plan (IDP) and site allocations outlined in the emerging Tottenham AAP and Site Allocations DPD.

10.9 Economic growth

- 10.9.1 There is a need to secure sustainable economic growth and business development, through increasing and diversifying employment opportunities; meeting the needs of different sectors of the economy and facilitating new land for business development. Compared to the rest of London, Haringey has levels of economic growth that are below average; a higher rate of unemployment and lower gross weekly pay per capita. However, Haringey also has the highest start-up of new businesses in London and the economy is dominated by small businesses with 90% of businesses employing 10 or fewer people. Evidence suggests that employment growth 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.
- 10.9.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of increased investment in regeneration areas (SP1, SP8 and SP10); however negative effects were predicted in terms of loss of employment land (SP8).
- 10.9.3 The proposed **Partial Review**, through changes to SP1, allows for increased development at town centres, particularly Wood Green, which should lead to positive effects in terms of economic activity. The proposed review also seeks to deliver additional jobs in Haringey Heartlands/Wood Green as part of mixed-use redevelopment. Also, changes to SP8 involve the de-designation of three Locally Significant Industrial Estates (based on the Employment Land Study 2014 and FALP); and adds additional policy protection for non-designated employment sites. This will lead to minor positive effects in terms of retaining existing employment opportunities; but also allow sufficient flexibility to adapt to changing market conditions and industrial/commercial requirements.

- 10.9.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review should help to retain and enhance employment opportunities and economic activity in the borough and update the Strategic Policies in order to capitalise upon changing commercial and industrial requirements in the period since the Strategic Policies were adopted. This is likely to result in a **significant positive effect** in relation to the baseline.

10.10 Skills and training

- 10.10.1 There is a need to develop the skills and training (included related facilities) needed to reduce unemployment and establish and maintain a healthy labour pool. Proportionately more Haringey employment than the London norm is with small firms often in the form of local retailers; which limits opportunities for employee training and progression within local firms. Evidence from providers active in the area suggest ongoing pressing demand for training in ESOL, literacy, numeracy and ICT, and predicts greater flows of people into employment once these skills barriers are addressed.
- 10.10.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved skills among working age residents (SP8, SP9 and SP16). It also noted that: SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion) and SP16 (Community Infrastructure) provide for educational facilities to meet local needs while SP17 (Delivering and Monitoring the Core Strategy) provides for planning obligations which includes training. SP8 (Employment) also provides for training programmes. However, skills development would depend on the appropriateness of programmes and suitability to local residents.
- 10.10.3 The proposed **Partial Review** seeks to focus growth in the east and centre of the borough where unemployment and skills are lowest. This should increase the accessibility of jobs and help to reduce unemployment; improving the skills of the local population.
- 10.10.4 The increase in housing development (SP1) will deliver additional community facilities (SP16) which can include skills and training centres. The Infrastructure Delivery Plan and Site Allocations DPD will outline the required infrastructure in due course. Additionally other policies in the DM plan can include requirements for local employment, apprenticeships, work experience and training in order to improve the local skills base.
- 10.10.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review should have little effect. The main policy referenced in the 2011 appraisal (SP9) will remain unchanged. The review is likely to have a minor positive effect through delivering additional infrastructure that can assist in developing skills and qualifications; but it is considered that other planning policies in the DM plan and Site Allocations DPD are likely to have a more significant effect.

10.11 Economic inclusion

- 10.11.1 There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses. Tottenham has some of the highest levels of unemployment in London and England, particularly amongst young people; whilst the borough average performs reasonably favourably compared to London. The London Plan highlights the 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.
- 10.11.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of reduced unemployment (SP8). It also noted that other policies including SP8 (Employment), SP9 (Improving skills and training) and SP15 (Community Infrastructure) will provide opportunities for jobs and training which could potentially contribute to this SA Objective.

- 10.11.3 The proposed **Partial Review** (through SP1) seeks to deliver the additional housing in areas that have good PTAL; at town centres that have good access to the Underground, buses and future Crossrail 2 stations. This should have the effect of increasing accessibility to employment for new residents in both Haringey and beyond.
- 10.11.4 Also, through SP8 the Partial Review seeks to add a degree of support for the mixed use redevelopment of buildings within Local Employment Areas designated as 'Regeneration Areas'. This is a necessary response to the ambitious employment growth targets set by the London Plan (2015), and could lead to some implications given that an outcome could be a gradual shift in the nature of jobs available in Haringey (with increased prevalence of office jobs).
- 10.11.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review reflects a town centre focus, which should also help to encourage new businesses in sustainable locations whilst the approach to employment land in SP8 is flexible to adapt to changing industrial and commercial requirements. However, some uncertainties are noted around the policy support for changes to employment land, which could have implications for economic inclusion.

10.12 Town centres

- 10.12.1 There is a need to enhance the environmental quality of town centres (including quality of buildings and public realm), ensure they are easily accessible and meet local needs. Wood Green is the largest centre in the borough and is a Metropolitan Centre in the London Plan. Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The economic down turn has stunted the ability of many of Haringey's centres to fulfil their function effectively, with Crouch End and Green Lanes having the highest percentage of vacant town centre floorspace. Wood Green is the best performing of Haringey's town centres, with 3.3% vacant town centre floor space.
- 10.12.2 The **2011 Strategic Policies SA Report** identified the likelihood of SP10 (Town Centres), which proposes expansion and intensification of town centres, contributing to town centre vitality. In addition, SP1 (Managing Growth) promotes growth in regeneration areas and SP15 (Culture and Leisure) proposes development of cultural quarters in Wood Green and Tottenham, which should contribute to the vitality of town centres.
- 10.12.3 The increased housing target under the proposed **Partial Review** (through SP1) permits development across the borough which is likely to benefit all town centres; however a significant increase in development at Wood Green over-and-above the existing Strategic Policies should help to increase local spending and the accessibility of the Metropolitan Centre. Additionally, the increased scale of development at all centres (but Wood Green in particular) should facilitate additional investment in the public realm and help to improve the streetscene and image of Haringey's town centres.
- 10.12.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to result in a **significant positive effect**; however it is noted that existing design policies in SP11 and further policies in the DM DPD will also have an influence.

10.13 Biodiversity

- 10.13.1 There is a need to protect and enhance priority species and habitats, improve ecological connectivity and enhance access. The Lee Valley Regional Park, designated as a Special Protection Area, straddles the eastern boundary of the borough, although access is an issue. The River Lee Navigation and Pyre's Brook waterways also offer important habitat, as do numerous other Sites of Importance for Nature Conservation (SINCs).

- 10.13.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improvement in quality and provision of open spaces (SP13); however significant negative effects were predicted in terms of increased pressure on open spaces, biodiversity and habitats (SP1, SP2 and SP3). It also noted that: SP13 (Open Spaces and Biodiversity) safeguards open spaces from development, seeks creation of new open spaces, protects green infrastructure and promotes enhancement to habitats and designated areas; SP11 (Design) promotes green and brown roofs; and SP12 (Conservation) promotes protection and enhancement of historic parks and gardens as well as protection of historic buildings, which could provide habitats for bats, etc. Other policies indirectly contribute to this objective, including: SP1 (Managing Growth), which directs growth to regeneration areas; and SP10 (Town Centres) which promotes intensification of town centres. These policies will reduce pressure to develop in greenfield land, which should indirectly benefit biodiversity.
- 10.13.3 The proposed **Partial Review** will lead to an increased population in east of borough and hence could have an adverse effect on existing open spaces, and the Lee Valley Regional Park, as an important biodiversity resource. Some parts of the east have poor access to open space and it is difficult to implement new open space as this would require the demolition of some buildings. Intensive use of existing green and open spaces could affect their biodiversity and amenity value and lead to a decline in their quality and integrity; leading to negative effects. It is noted that the Lee Valley is set to benefit from increased accessibility through enhanced east/west connections.
- 10.13.4 On the plus side, the increased scale of development could fund strategic investment in green infrastructure (including the Green Grid) to help create a resilient network of green corridors, and improve open space. This would lead to positive effects compared to the baseline; particularly when focused in the east of the borough.
- 10.13.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to a significant effect. The 2011 appraisal findings still stand.

10.14 Townscape and cultural heritage

- 10.14.1 There is a need to preserve or where possible enhance buildings and areas of architectural and historic interest. The borough has 29 Conservation Areas which cover a large part of the west of the borough and the entire Tottenham High Road corridor in the east. The borough includes 467 Listed Buildings and 1150 locally listed Buildings of Merit. Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.
- 10.14.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved townscape and public realm (SP11, SP12 and SP14). It also noted that SP11 (Design) and SP12 (Conservation) will lead to benefits.
- 10.14.3 The proposed **Partial Review**, whilst recognising that growth needs to be distributed across the borough, reflects the constraints for significant development in the west areas, which in addition to offering few strategic redevelopment sites are more sensitive in terms of townscape and heritage considerations. This is a positive; however, there are still set to be some challenges in relation to managing development in other areas where there are heritage assets. Notably, Tottenham High Road has a significant number of Listed and Locally Listed Buildings as well as being a contiguous Conservation Area. Existing policies SP11 and SP12 will apply; however further DM policy will need to be robust and comprehensive in order to ensure that the scale of development proposed is sympathetic to its context and does not harm designated assets or their settings. Without such an approach there is the potential for significant negative effects.

- 10.14.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review leads to uncertain effects. Effects will be to a large extent driven by DM policy, the Tottenham AAP and the Site Allocations DPD, which will allocate sites and seek to put in place suitable development management policies.

10.15 Open space

- 10.15.1 There is a need to deliver a network of high quality, accessible open spaces. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. Haringey has a network of open spaces that are relatively fragmented. The All London Green Grid Framework presents an opportunity to enhance inter- and intra-borough green corridors.
- 10.15.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved landscape (SP11 and SP13); however significant negative effects were predicted in terms of increased pressure on open spaces (SP1 and SP2). It also noted that: SP13 (Open Spaces and Biodiversity) proposes to safeguard existing spaces from development and promote enhancements to the green infrastructure network; and SP11 (Design) proposes consideration of the setting of development.
- 10.15.3 The proposed **Partial Review** is unlikely to result in a situation where open space deficiencies can be addressed more fully (i.e. through SP13) given the built up nature of the borough. Significant growth is identified at Northumberland Park and Bruce Grove which are located in areas of deficiency. This, and development in the east of the borough more generally, is likely to exert increased pressure on existing open spaces and the Lee Valley Regional Park; although it is noted that the increased development can help fund and design-in improved accessibility to the Lee Valley Regional Park and to deliver the All London Green Grid.
- 10.15.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects. It is recognised that open space enhancement is a focus of the emerging Development Management Policies DPD and Site Allocations DPDs, although no opportunities are identified for allocating sites purely for the purpose of delivering new open space.

10.16 Water resources

- 10.16.1 There is a need to preserve water quality (ground and surface) and quantity and ensure the type and capacity of infrastructure is known for future development. The modification of rivers in the area including in-stream structures and culverts has led to loss of habitat diversity. Upstream of its upper confluence with Pymmes Brook the River 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). Green roofs have the potential to play a significant part in reducing surface water runoff and storing rainwater.
- 10.16.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of in terms of increased water use (SP1 and SP2). It also noted that: SP1 (Managing Growth), SP2 (Housing) and SP10 (Town Centres) will maximise housing provision and as a result, increase water consumption. However, SP5 (Water Management and Flooding) will require developments to decrease the demand for water and improve the water environment and quality. There are also initiatives that Haringey supports to improve the River Lee.
- 10.16.3 The proposed **Partial Review** (through SP1) will lead to an increased scale of development and further increase net water use; however estate renewal (SP2) and the increased scale of growth incorporating water consumption reduction measures should help to reduce per capita water consumption, which in London is above the national average.

10.16.4 The increased scale of development also provides the opportunity for additional deculverting and river corridor enhancement, particularly in the east of the borough (where the majority of development is focussed). This would likely enhance water quality. A **recommendation** made within the February 2015 Interim SA Report (“It is recommended that policy is strengthened by requiring that development close to waterways helps to protect and where possible enhance water quality...”) has not been explicitly addressed through the Strategic Policies Partial Review, but DM policy in respect of water quality has been strengthened.

10.16.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects.

10.17 Soil and land quality

10.17.1 There is a need to encourage the effective use of land through the development of brownfield land (including where necessary the remediation of contamination). A variety of industrial land uses have left behind substantial contamination in Haringey which may need to be remediated before development.

10.17.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of increased use of previously developed land (SP1, SP2 and SP10). It also noted that: SP10 (Town Centres expansion) is expected to develop previously developed land; and SP1 (Managing Growth) directs development to regeneration areas with underused sites (Haringey Heartlands, Tottenham Hale, Seven Sisters and Wood Green Metropolitan Centre).

10.17.3 The proposed **Partial Review** seeks to increase the amount of previously developed land utilised through requiring additional housing and employment land to deliver the London Plan targets. This increases the potential for contaminated land remediation and is particularly the case at former industrial sites at Haringey Heartlands and in the Lee Valley corridor.

10.17.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to require a significant number of additional sites to be delivered, given the built-up nature of the borough the plan; more likely an increase in the density on available sites will be required. This is likely to have a negligible or very minor positive effect.

10.18 Flood risk and climate change

10.18.1 There is a need to reduce and manage flood risk from all sources, including through the use of sustainable drainage measures. The main source of fluvial flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. According to the SFRA surface water flooding is the source of flooding likely to have the greatest effect in Haringey. Flood risk is largely present in the east of the borough, with more than 50% of Tottenham Hale ward lying within Flood Zone 2.

10.18.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of increased resource use, waste generation and CO2 emissions (SP1 and SP2). Significant positive effects were predicted in terms of the potential to reduce energy use (SP4), deliver flood attenuation (SP5) and implement sustainable design and construction practices (SP11). It also noted that some areas of change are in or near flood risk zones (Tottenham Hale, Northumberland Park) and so the SP1 (Managing Growth) could have a significant adverse impact.

- 10.18.3 The proposed **Partial Review** (through SP1) seeks to distribute housing at town centres, at transport hubs and along transport corridors. This approach will deliver housing in the most accessible locations and near a large number of facilities, shops and services which should help to reduce the need to travel. It is acknowledged that increased development in the borough is likely to increase net resource use / emissions / waste generation, but the policy approach will have a positive effect in terms of reducing per capita effects.
- 10.18.4 Flood risk is a significant issue in Tottenham; however increased development in Tottenham will be made safe in-line with the NPPF, London Plan and emerging DM policy so no negative effects are predicted. Additionally the increase in development and application of SuDS techniques increase the number of opportunities for reducing surface water flooding.
- 10.18.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to lead to minor positive effects.

10.19 Air quality

- 10.19.1 There is a need to improve local air quality, including through measures to reduce car use such as encouraging businesses to produce green travel plans. The area 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.
- 10.19.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of reduced air quality due to increases in traffic (SP1, SP2 and SP10); however significant positive effects were predicted in terms of reducing the impact of growth by promoting sustainable transport (SP7). It also noted that SP7 (Transport) could have a positive impact on air quality in the long term by reducing car dependency. Also, SP1 (Managing Growth) and SP10 (Town Centres) direct growth to regeneration areas and town centres which should reduce travel and indirectly contribute to air quality objectives.
- 10.19.3 The proposed **Partial Review**, through increasing the number of residents in the borough, is likely to be increased congestion as a result of the demand for transport. It is considered that by policy focusing growth at sustainable town centre, transport hub and corridor locations and areas with high PTAL and future accessibility to Crossrail 2; the review should help to reduce the need to travel and ensure that air quality is not significantly worsened by new development,
- 10.19.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review could lead to a minor negative effect; however, it is noted that DM policy will set specific criteria for managing air quality, as well as for travel plans in order to reduce the impacts of new development that has the potential to generate significant numbers of movements.

10.20 Noise

- 10.20.1 There is a need to minimise the impact of the ambient noise environment on quality of life. However, there is no suitable baseline data available in relation to noise issues.
- 10.20.2 The **2011 Strategic Policies SA Report** did not explicitly consider the potential for the Strategic Policies to result in significant effects in terms of 'noise'.
- 10.20.3 The proposed **Partial Review**, through an increase in development in the borough, is likely to increase noise through construction and operation. The majority of development is residential development, which is not considered likely to increase ambient noise levels in comparison to commercial and industrial sites. There are, however, considerations around the plan directing new housing to locations where there could be noise issues associated with nearby employment.

- 10.20.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to a significant increase in noise levels, recognising the need to plan in-line with the London Plan and emerging DM policy on noise.

10.21 Energy and carbon

- 10.21.1 There is a need to increase energy efficiency and support renewable energy. Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in the Upper Lee Valley and other areas.
- 10.21.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of the increase in emissions due to the scale of development proposed (SP1, SP2 and SP10); however significant positive effects were predicted in terms of introducing policy to reduce energy use. It also noted that: policies likely to contribute to this SA Objective include: SP4 (Working towards a Low Carbon Haringey), which promotes energy efficiency; and SP11 (Design), which promotes sustainable construction and methods (solar design, natural ventilation and better insulation). Both these policies could help reduce emissions from heating and energy use. In addition, SP7 (Transport), which promotes public transport, walking and cycling, has the potential to reduce car use and consequently, vehicle emissions.
- 10.21.3 The proposed **Partial Review** (through SP1) will lead to an increase in the local population and a likely increase in movements and emissions; although as stated under the appraisal for Air Quality this is largely offset through the sustainable location of development at town centres, in areas of high PTAL and at future Crossrail 2 locations. The spatial strategy will reduce the need to travel as well as increase the potential to connect to low carbon energy infrastructure and decentralised energy networks through delivering high density development in the east of the borough in locations able to connect to infrastructure in adjacent Central Leaside (in Enfield). Additionally, through redevelopment, including estate renewal (SP2), it should be possible to increase the environmental performance of buildings.
- 10.21.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects. Existing policies SP4 and SP11 will still apply.

10.22 Waste management

- 10.22.1 There is a need to reduce consumption of raw materials and increase re-use and recycling rates, notwithstanding the fact that Haringey currently achieves good recycling rates.
- 10.22.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of increased resource use, waste generation and CO2 emissions from new development (SP1, SP2 and SP10). It also noted that SP1 (Managing Growth) and SP2 (Housing) are likely to have a cumulative adverse effect through increased demand for resources. However, the Core Strategy addresses these potential impacts through the following policies: SP11 (Design), which promotes sustainable construction; SP4 (Working towards a Low Carbon Haringey), which promotes energy efficiency; and SP5 (Water Management and Flooding), which promotes reduction in water use.

10.22.3 The proposed **Partial Review** (through SP1) will lead to an increase in development compared to the baseline; but existing policies SP6 and SP11 remain extant and should ensure that per capita resource use, waste generation and water use decline; particularly when applied to estate renewal (SP2). The proposed review also looks to confirm that there will be a reduced waste apportionment for Haringey from 237,000 to 182,000 in the North London Waste Plan (NLWP); however site allocations will be a matter for the NLWP. There are currently two reuse and recycling centres, with other waste, if suitable, sent for incineration at Edmonton Waste Incinerator (in neighbouring Enfield), which also generates electricity for the borough.

10.22.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects.

10.23 Sustainable transport

10.23.1 There is a need to improve walking and cycling routes, promote the use of public transport and reduce reliance on the private car. Haringey has some of north London's best public transport links; however, cycling currently only forms 2% of all journeys.

10.23.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved public transport, walking and cycling (SP7). It also noted that SP7 (Transport) promotes public transport, cycling and walking. Other policies which could potentially contribute to this Objective are: SP 1 (Managing Growth), which promotes growth in regeneration areas; and SP10 (Town Centres).

10.23.3 The proposed **Partial Review** focuses additional development in sustainable locations in town centres, in areas of high PTAL and at future Crossrail 2 stations. This is likely to reduce the need to travel and support sustainable transport, particularly at Wood Green Metropolitan Centre where the scale of development has particularly increased.

10.23.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review should ensure that the significant increase in population does not lead to a significant increase in congestion and motorised transport. In addition the focus on mixed-use development and increased employment in Haringey is likely to reduce out-commuting. This is likely to lead to a **significant positive effect** compared to the baseline.

10.24 Overall conclusions

- 10.24.1 The proposed Partial Review is likely to lead to significant positive effects on the baseline situation (i.e. a situation that assumes implementation of the existing Strategic Policies – see **Box 14.1**) in terms of a number of sustainability issues/objectives.
- 10.24.2 The increased residential development is focused at Growth Areas and Areas of Change outlined in the adopted Strategic Policies DPD. The scale of growth creates an opportunity for investment in infrastructure in the most deprived part of the borough, which should lead to benefits in terms of a number of sustainability objectives.
- 10.24.3 The spatial approach also seeks to address housing affordability; improve the condition of housing for existing residents; support economic growth ambitions; and reduce the need to travel. The review is also likely to have significant positive effects for town centres across the borough, most notably at Wood Green given the scale of development and its role at the top of Haringey's settlement hierarchy.
- 10.24.4 No negative effects are predicted, however some uncertainties are highlighted in terms of health, community cohesion, open space and air quality. Some uncertainties exist in relation to estate renewal (through SP2), which should have a positive effect through improving conditions, but which will need to be sensitively managed. It is noted that a number of changes have been made to the policy approach to estates renewal and improvement since February 2015, in response to **past SA recommendations** and consultation responses.

Box 10.1: Overall conclusions from the 2011 Strategic Policies SA Report

Overall, the Core Strategy is predicted to have positive effects particularly against the social and economic objectives. However, in terms of the environmental objectives, there are both positive and negative potential effects.

Overall positive social effects are predicted to be improvements relating to: provision of affordable housing, improving access to services, improving public transport infrastructure and improving and providing community, educational, leisure, cultural and health facilities.

Overall positive economic effects are expected from the protection of employment land, provision of training and skills programmes and promotion of development in town centres. Improvement in public transport infrastructure will also help support business activities through improved access.

Overall positive environmental effects are predicted to include improvements to: public realm, townscape and landscape; standards of design and construction and open spaces. Improved public transport and promotion of walking and cycling is likely to reduce car use and emissions. The Core Strategy includes policies relating to water use and flood risk and energy use,

Nevertheless, there are some negative effects predicted from the Core Strategy. The main issues relate to: resources use, increased traffic and pressure on land.

The proposed growth in Haringey will result in increased use of resources (energy, water and land) and generate waste. There will also be increased pressure on utilities and services. There are policies in the Core Strategy which seek to reduce resource use (SP4, SP5 and SP11) but there will still be net increase. Policies SP16 and SP17 address the need for facilities and infrastructure to support growth.

Developing Wood Green and other centres are likely to increase travel to these centres and increase traffic locally. However, travel to the district centres may reduce travel to centres outside Haringey. Also, improvements in public transport, cycling and walking routes may encourage more sustainable local modes of transport.

There are conflicting demands on land – employment, residential and businesses as well as open spaces. The Core Strategy proposes intensification in employment areas and town centres, which may help reduce pressure to build on open spaces.

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 Pre-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'. In-light of appraisal findings (i.e. predicted effects and uncertainties) presented in Part 2 above, monitoring efforts might focus on:

- The effect of estate renewal on existing communities / community cohesion;
- The mix of affordable housing;
- Increase in population within areas of high/low PTAL;
- Development in areas of flood risk; and
- Use of green spaces and the Lee Valley Regional Park.

APPENDIX I - REGULATORY REQUIREMENTS (1)

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

Schedule 2

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
(c) the environmental characteristics of areas likely to be significantly affected;
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
(i) a description of the measures envisaged concerning monitoring.

Interpretation of Schedule 2

The report must include...

An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the SA Report]	
The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i> [Part 2 of the SA Report]	
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]	
An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>	
The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>	i.e. answer – <i>What's the scope of the SA?</i>
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
Environmental characteristics of areas likely to be significantly affected		
Key environmental problems / issues and objectives that should be a particular focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>	

i.e. answer - *What's the scope of the SA?*

APPENDIX II - REGULATORY REQUIREMENTS (2)

Appendix I signposts to broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met.

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 5 ('What's the scope of the SA'). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix III. With regards to explaining 'how... considerations have been taken into account' - - Chapter 6 ('Reasons for selecting the alternatives dealt with') explains how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015 (or, indeed, was <i>not</i> refined) - Chapter 8 ('Reasons for selecting/developing the preferred approach') explains the how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. - Chapter 10 ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in Feb 2015.

f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	- Chapter 7 ('Alternatives appraisal findings') presents the appraisal of reasonable alternatives. - Chapter 10 ('Appraisal of the draft plan') presents the appraisal of the draft plan. As explained within the methodology sections, as part of appraisal work consideration has been given to the established SA scope, and the need to consider the potential to various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The Feb 2015 'appraisal of the draft plan' (Chapter 14 within the Interim SA Report) made a number of recommendations, and subsequently these were taken on-board by the Council when finalising the plan for publication/submission. At the current time, Chapter 10 ('Appraisal of the draft plan') concludes by highlighting that there are uncertainties regarding the effects of the plan in some respects (with the implication being that further consideration by the Council may be warranted).
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 6 deals with 'Reasons for selecting the alternatives dealt with'. Also, Chapter 8 presents 'Reasons for selecting/developing the preferred approach'. Methodology/limitations are discussed ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives as appropriate.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 13 presents 'measures envisaged concerning monitoring'.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	An Interim SA Report, which essentially presented all the information required of the SA Report, was published for public consultation alongside the draft plan in February 2015, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the pre-submission plan, under Regulation 19, so that representations might be made ahead of submission.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Report (Feb 2015), alongside consultation responses received, when finalising the plan for publication/submission. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when considering the plan at Examination (i.e. taken into account by the Planning Inspector, when considering the plan's soundness, and the need for any modifications).

APPENDIX III: CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of sustainability objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal work under the SA framework.

What's the sustainability context?

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.

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.

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 2008¹¹. 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.

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.

What's the sustainability baseline?

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.
- There is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation.
- Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery
- There is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence

¹¹ 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.

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 not particularly high, but there are localised issues. In Tottenham Hale 22.45% of residents aged 16 and over have 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.
- Although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment.
- As a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers. This issue has a greater impact on children from Black and other ethnic minority groups and children who are eligible for free school meals. Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small.
- Post-16 attainment in Haringey is improving but opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education.

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.
- Health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children.
- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).
- There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas.
- The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years to ensure essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives.
- Environmental issues are more concentrated in certain parts of the borough. For example, town centres are a particular focus for highway congestion and poor air quality. Some issues also impact more heavily in more deprived parts of the borough, with higher accident casualty rates in the East of the borough.

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.
- Housing need is high amongst certain groups of residents including those with the protected characteristics. For example, levels of homelessness are high amongst female lone parents.
- Homelessness is also high in the age group 16-24 and 25-44 compared to the expected profile from census data.
- Homelessness data indicates Black households approach as homeless at a level which is more than twice their representation in Haringey's population.
- Some protected groups also have high levels of housing need due to higher levels of vulnerability. Homeless acceptance due to mental or physical disability is higher than would be expected given the profile of disability in the 2011 census, indicating that disability may be a factor in causing homelessness for these groups of households.
- The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services.

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.
- Compared to London, Haringey has a similar proportion of 0-19 year olds, a higher working age population and a lower proportion of older people. Those aged 25-29 and 30-34 form the two largest groups in the borough.
- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and around 200 languages are spoken. Our population is the fifth most ethnically diverse in the country.

- Historically, Haringey has experienced a high level of population turnover. Most population turnover occurs by people moving into and out of other parts of the UK.

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.
- Improved access to services and facilities is key to ensuring equality of opportunity. Certain groups may suffer particularly from reduced activity, for example those less able to travel due to mobility issues or low income.
- Analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough. For example, the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area.
- Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands

Economic growth

- When 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.
- 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 roles¹² (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.
- Labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities.

¹² 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.

- There is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park. Unemployment and the proportion of young people who are NEET (Not in education employment or training) is higher in the east of the borough.

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
- 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.

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 (some of which have had Character Appraisals¹³ completed), two Registered Parks and Gardens (Finsbury Park and Alexandra Park), 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. Also, 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.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.

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. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land, and 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.

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

- 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.
- Open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough.

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 Moselle Brook and Stonebridge Brook is heavily modified. These Brooks are both tributaries of the Lower Lee River, classified as having '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 GLA¹⁴ estimate that buildings cover 24,000 hectares or 16% 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 have 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 level¹⁵ 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.

¹⁴ 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)

¹⁵ 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)

- 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. 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.
- 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.

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

As explained within Chapter 4 (What's the scope of the SA?), the SA process undertaken for the Haringey Local Plan has sought to integrate EqIA and HIA. Relevant issues have been considered through scoping work (i.e. through context and baseline review - see Appendix III; and establishment of the SA framework - see Chapter 4) and have fed into the appraisal of alternatives (see 'Part 1') and the appraisal of the draft plan (see 'Part 2'). The aim of this appendix is to summarise and 'signpost'.

- Community cohesion is an important broad issue, recognising that: almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with around 200 languages are spoken; and historically, Haringey has experienced a high level of population turnover. Estate renewal is an important consideration, and there are some inherent uncertainties; however, the appraisal of the draft plan ('Part 2' above) is able to conclude that: *"...with regards to estate renewal it is clear that the Council has responded to consultation responses and past appraisal findings, and amended the preferred approach accordingly in order to achieve the best outcomes."*
- Health is an important broad issue, recognising that: health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years); there is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. Perhaps the most notable effects of the Strategic Policies Partial Review relate to the increased growth quantum, and the spatial distribution that is supported. The result should be targeted regeneration, with a focus on town/district centres, which should help to increase uptake in active travel (walking and cycling) and enable investment in leisure and community facilities. Also, a new commitment to estate renewal and improvement has the potential to improve the quality of the dwelling stock.
- Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals); Children from Gypsy Roma and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small; and whilst post-16 attainment in Haringey is improving. Opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. However, the Strategic Policies Partial Review is set to have relatively little effect in this regard, as discussed under the 'education' heading within the appraisal of the draft plan ('Part 2' above).
- Crime is an important broad issue, recognising that: there is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation; young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery; and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence. As discussed under the 'crime' heading, as part of the appraisal of the draft plan ('Part 2' above), the Strategic Policies Partial Review is set to have limited effects, with more notable effects likely to result from the other emerging plans.

- Housing is an important broad issue, recognising that: housing need is high amongst certain groups of residents including those with the protected characteristics, e.g. levels of homelessness are high amongst female lone parents; black households approach as homeless at a level which is more than twice their representation in Haringey's population; some protected groups also have high levels of housing need due to higher levels of vulnerability, with homeless acceptance due to mental or physical disability higher than would be expected given the profile of disability in the 2011 census. The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services; and through the Strategic Policies Partial Review new housing is set to be focused on the east and centre of the borough where housing affordability and the quality of the existing dwelling stock is at its lowest. Importantly, there is a commitment to ensuring no loss of social housing floorspace through the estate renewal programme, and a commitment to rebalancing the supply of social housing, ensuring that the acute need for family housing is better addressed. Also, it is noted that supporting text commits to appointing an independent advisor who can advise residents on rights and options at all stages of the renewal process.
- Economic inclusion is an important broad issue, recognising that: labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics, e.g. the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities; and there is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. This is an important issue set to be addressed through all four plans, including the Strategic Policies DPD, recognising the support for redevelopment of some existing employment areas. Employment density will be increased in the vast majority of cases, and will be significantly increased overall (i.e. across the borough); however, the nature of jobs available within the borough is set to shift, and there is a risk of disproportionate effects.
- Environmental quality is an important broad issue, recognising that: the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with the protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality); environmental issues are more concentrated in certain parts of the borough, e.g. town centres are a particular focus for highway congestion and poor air quality, and there being higher accident casualty rates in the relatively deprived east of the borough; and open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough. The Strategic Policies Partial Review supports an increased population density in Haringey, which could have negative implications for environmental quality; however, a carefully targeted approach is set to be put in place, with much emphasis on directing growth to areas of high PTAL and also to areas in need of regeneration (i.e. areas where there will be opportunities to increase urban realm quality).
- Accessibility is an important broad issue, recognising that: improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income); analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough, e.g. the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area. Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands, however, this is only set to be addressed through the plans at the current time to a limited extent, as work on the Infrastructure Delivery Plan (IDP) is still on-going, and it is through this plan that provision will primarily be made. Having said this, it is suggested that the Strategic Policies Partial Review performs relatively well as focusing growth/change on Wood Green, the Seven Sisters Corridor, Tottenham and town centres is likely to lead to benefits. This strategy should help to improve access to town centre facilities and community infrastructure for existing and future residents.



Sustainability Appraisal (SA) of the DM Policies DPD

SA Report

Published alongside the pre-submission version of the plan

November 2015



Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	SA Report published alongside the pre-submission version of the DM Policies DPD	Mark Fessey, Principal Consultant	Steve Smith, Technical director	Steve Smith, Technical director

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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' issues¹), 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 **Table 2.1** explains more about the regulatory basis for answering these 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 other 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)

Table 2.1: Questions answered by this SA Report, in-line with Regulatory⁵ requirements

PRIMARY QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What has plan-making / SEA involved up to this point? [See Part 1 , below]		- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SEA findings at this current stage? [See Part 2 , below]		- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next? [See Part 3 , below]		A description of the monitoring measures envisaged
OTHER QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What's the plan seeking to achieve?		An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What's the scope of the SEA?	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment

N.B. The right-hand column of Table 2.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

Also, **Appendix II** presents supplementary information (in the form of a checklist) to further explain how/where regulatory requirements are met within this report.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

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 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; the London Plan (2015), 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 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 somewhat strategic in nature, omitting 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 III**.

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.⁶
- 4.1.3 As such, an SA Scoping Report was published for consultation in 2012.⁷ 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.

⁶ 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.'*

⁷ 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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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?

4.3 A note on 'equalities' and 'health' considerations

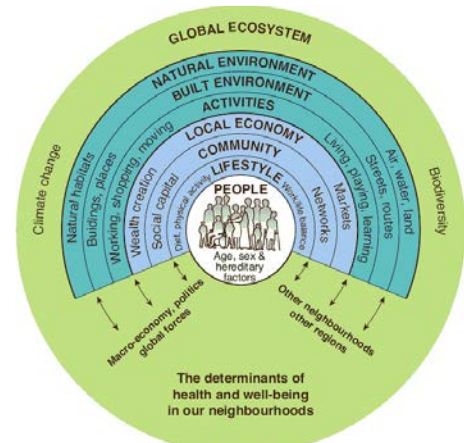
4.3.1 Equality and health considerations were a focus of SA scoping work. As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence the SA process 'integrates' Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). **Appendix IV** signposts to areas within this report where EqIA and HIA has 'fed-in'.

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.

Determinants of health and wellbeing in our neighbourhoods, from Barton & Grant (2006)



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:

- Managing housing conversions
- Housing density and design
- Employment sites (1)
- Employment sites (2)
- Town centre uses
- Negative clusters: hot food takeaways and betting shops
- Siting and design of tall buildings
- Views and vistas
- Heritage and conservation
- Car-free or car-capped developments
- Carbon offsetting
- Community infrastructure
- Open space provision

5.1.2 Systematic appraisal of (and consultation on) reasonable alternatives, in relation to these topics, is helpful as it equates to proactive plan-making, and is a means of ensuring that the final policy approach is sufficiently justified.

Reasons for focusing on these policy areas

5.1.3 These are the same key strategic issues that were the focus of alternatives appraisal within the Interim SA Report of February 2015, with the exception that 'Open space provision' has been added to the list.

5.1.4 All of these topics offer an opportunity to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Haringey's spatial strategy. It is not the case that the preferred policy approach in relation to any of the topics previously examined in February 2015 is now 'set in stone' to such an extent that it is no longer helpful to dwell on alternatives, nor is it the case that any further topics - other than open space provision - have emerged since February 2015 as necessitating alternatives appraisal.⁸ Other policy topics besides those listed above could *potentially* 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 the direction set by higher level policy, technical work and consultation, without formal alternatives appraisal.

⁸ There are several new policy areas that have emerged since February 2015, but it is not thought that any necessitate formal alternatives appraisal. Three of the new policy areas relate to implementation and delivery, specifically: 1) Use of Planning Obligations; 2) Regeneration and Masterplanning; and 3) Supporting Site Assembly. The matter of regeneration and masterplanning / site assembly has been a focus of consultation responses to some extent, in particular responses received by those who would wish to see less of a strategic approach (i.e. more of a piecemeal approach) in some areas of the Borough (in order to maintain existing character); however, given the plan objectives, and need to ensure and demonstrate that the plan is deliverable, it is not clear that there are reasonable alternatives. Two other new policy areas are: 4) Maximising the use of town centre floorspace; and 5) Backland, garden land and infill development; however, these need not be the focus of alternatives appraisal (for the reasons set out in paragraph 5.1.4).

Structure of this part of the SA Report

5.1.5 Each of the 13 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?

5.1.6 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?

5.1.7 In addition to alternatives appraisal, development of the draft (pre-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 current draft plan.

6 HOUSING CONVERSIONS

6.1 Introduction

- 6.1.1 There is a demand for housing within the borough, including family housing. Conversions have historically made a relatively small but consistent contribution to housing supply however the incremental and cumulative impact of conversions over the years has reduced the availability of family housing, and negatively impacted local amenity in some circumstances.

6.2 Reasons for selecting the alternatives dealt with

- 6.2.1 The Local Plan is not reliant on housing conversions to meet strategic housing targets and the Council therefore has the flexibility to consider policy options for maintaining access to and availability of family housing. An approach to restrict conversions in certain areas to preserve larger and family homes is therefore proposed. This should be considered against an option of not introducing this restriction.

- 6.2.2 The following alternatives have been appraised:

Option 1 - Establish a restricted conversion area to preserve larger and family homes

Option 2 - Do not establish a restricted conversion area.

- 6.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

6.3 Summary appraisal findings

- 6.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix V**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 6.1: Summary appraisal findings: Housing conversions

Relevant sustainability topics	Option 1	Option 2
Health	=	
Housing	1	2
Community Cohesion	1	2
Economic Growth	=	
Soil and Land Quality	2	1
Flood Risk and Climate Change	=	
Energy and Carbon	2	1
<u>Summary</u> A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.		

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

- 6.3.2 In order to help support and deliver mixed and balanced communities, including a range of housing options across the borough, an approach to restrict the conversion of family homes is preferred (Option 1). The preferred option will help to address local housing need whilst maintaining and improving local character and amenity. In addition, the preferred option will not inhibit the Council's ability to meet its strategic housing target. The SA reflects the likely positive effects of this option, particularly on the objective of housing.

7 HOUSING DENSITY AND DESIGN

7.1 Introduction

- 7.1.1 Haringey's annual strategic housing delivery target is expected to increase from 820 to 1,502 in the London Plan. There is therefore an imperative to maximise the delivery of housing on development sites. However, this delivery needs to be balanced against wider considerations around maintaining and improving local character, amenity and access. There is a need to appropriately situate new housing in the local context.

7.2 Reasons for selecting the alternatives dealt with

- 7.2.1 The Strategic Policies DPD sets out that new development should comply with the density standards set out in the London Plan. This is a baseline position which should be considered. However, the DM Policies document offers an opportunity to provide more detailed policy and guidance on the application of the London Plan policy, taking account of local technical evidence and individual site circumstances.

- 7.2.2 The following alternatives have been appraised:

Option 1- Apply London Plan density standards, but allow flexibility in applying these standards, based on local circumstances, to optimise housing delivery

Option 2 - London Plan standards applied with no flexibility for consideration of local or site circumstances.

- 7.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

7.3 Summary appraisal findings

- 7.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VI**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 7.1: Summary appraisal findings: Housing density and design

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Education	=	
Health	=	
Housing	★1	2
Community Cohesion	★1	2
Economic Growth	★1	2
Economic Inclusion	★1	2
Soil and Land Quality	★1	2
Flood Risk and Climate Change	=	
Energy and Carbon	★1	2
Sustainable Transport	★1	2
Summary Haringey is a densely populated borough (86.2 persons per hectare; well above the London average of 52) and the population is set to increase by 31,234 over the period of 2011 to 2021. This indicates that some high density housing schemes are needed, perhaps going beyond what is recommended in the London Plan. Against this background, Option 1 is seen to perform well in terms of sustainability objectives. As well as benefits in terms housing objectives, targeted high density development in Haringey is supported in terms of 'sustainable transport', 'reducing per capita carbon emissions' and 'increasing accessibility to local jobs'. However, there are risks around access to health care and community infrastructure more generally. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.		

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

- 7.4.1 A flexible policy approach to housing density (Option 1), based on the London Plan density matrix, is considered an appropriate means to ensure that development is guided by local and site specific circumstances. Some locations in Haringey may be better suited to higher or lower density development than others. As such, it is not considered that a strict interpretation of the density matrix would be the best option, particularly in the wider view of maximising housing delivery and responding to local character. The SA confirms that a flexible policy approach would likely result in positive effects across a number of sustainability objectives.

8 EMPLOYMENT SITES (1)

8.1 Introduction

- 8.1.1 The Strategic Policies DPD aims to facilitate a gradual restructuring of the borough's employment land portfolio in order to attract a wider range of businesses, as well as to facilitate inward investment and regeneration. There is also a need to provide more and improved local job opportunities, particularly to meet the borough's employment growth targets, which have risen significantly since the adoption of the Further Alterations to the London Plan. The DM Policies DPD provides an opportunity to set more detailed policy requirements to help meet these objectives.

8.2 Reasons for selecting the alternatives dealt with

- 8.2.1 B Class employment uses are broadly acceptable in Haringey's employment sites and areas. However, the nature of employment activity is generally dependent on the nature of use within the B Class. Some B Class uses (such as B1 and B2) offer the potential for higher density employment development than others (B8). Given the strategic employment objectives set out above, it is appropriate to consider options which differentiate between the range of acceptable uses within the B Class.

- 8.2.2 The following alternatives have been appraised:

Option 1 - Requirement to maximise employment densities on sites

Option 2 - Less restrictive approach, with no specific steer for higher employment densities.

- 8.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

8.3 Summary appraisal findings

- 8.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VII**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 8.1: Summary appraisal findings: Employment sites (1)

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Community Cohesion	=	
Economic Growth	1	2
Economic Inclusion	1	2
Soil and Land Quality	1	2
Noise	1	2

Summary

In an area that is constrained in terms of the availability of land for employment development and has high unemployment levels, intensifying the existing offer is an important priority to create more jobs for the growing population and to address historic local unemployment. Against this background, Option 1 is seen to perform well in terms of sustainability objectives, with significant positive effects predicted in terms of economic growth and economic inclusion. A risk is that if/when space for large floorspace uses is needed, there will not be the land available to accommodate these uses, but this is a more minor consideration given the evidence suggesting economic growth locally is considered most likely to come from B1 development.

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

- 8.4.1 The Strategic Policies DPD sets out acceptable uses in identified Strategic Industrial Locations. However there is scope to consider more locally specific approaches to development in employment areas. There is a limited supply of employment land in Haringey and a targeted response is needed to ensure the use of this land is fully maximised, particularly to raise the level of business and employment in the borough. An approach which is more prescriptive about land uses, facilitating site intensification and higher density employment development is therefore preferred. The SA broadly supports this option with positive effects identified across a range of sustainability objectives.

9 EMPLOYMENT SITES (2)

9.1 Introduction

- 9.1.1 Whilst safeguarding land for employment is important to support and promote economic development, there is significant pressure to accommodate other land uses in the borough, including for housing, and it is also the case that there are viability challenges associated with employment led redevelopment schemes. The Strategic Policies DPD therefore provides some flexibility for land uses in certain employment locations, particularly where there is a need to facilitate site renewal and regeneration.

9.2 Reasons for selecting the alternatives dealt with

- 9.2.1 It is vital that the borough has a sufficient supply of employment land, and so given the context provided by the Strategic Policies DPD (which provides some flexibility for land uses in certain employment locations) there is a need to consider how best to maximise employment uses on existing employment sites that will be the focus of mixed use redevelopment.

- 9.2.2 The following alternatives have been appraised:

Option 1 - Allow introduction of non-employment uses (as part of mixed use schemes) in certain designated employment locations, to cross-subsidise and enable new employment development to come forward

Option 2 - Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development.

- 9.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

9.3 Summary appraisal findings

- 9.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VIII**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 9.1: Summary appraisal findings: Employment sites (2)

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Housing	=	
Community Cohesion	=	
Economic Growth	★1	2
Economic Inclusion	★1	2
Noise	=	
<u>Summary</u>		
Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.		

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

- 9.4.1 There is a need to ensure that the borough's employment land is maximised. Fully employment led schemes may be difficult in certain circumstances, given viability considerations. Therefore, an approach which enables the introduction of more viable mixed uses to cross subsidise employment development is preferred. Whilst the SA scores the preferred option positively, it raises concerns over the issues of access to key services and to sustainable transport, as well as amenity. The policy requirements have been nuanced to ensure the approach is limited to specified locations, where a more flexible approach to development is accepted and with high public transport accessibility levels. The policy will also work in conjunction with other DM policies which seek to protect and enhance amenity.

10 TOWN CENTRE USES

10.1 Introduction

- 10.1.1 The Strategic Policies DPD recognises the important role town centres have in the borough. Beyond being a place where people shop, they are the heart of the communities they serve, providing a location for jobs, services and community facilities. The importance of healthy and vibrant town centres has been highlighted, in particular due to the detrimental effects of vacant shops, changing shopping patterns and increasing need for centres to accommodate a wider range of uses. The DM Policies provide an opportunity to set more detailed policy requirements for the uses within town centres.

10.2 Reasons for selecting the alternatives dealt with

- 10.2.1 In order to address the issue of town centre vitality and viability, the reasonable alternatives are set to consider a range of thresholds for A1 uses. This includes an option of setting no thresholds for A1, which is a less restrictive approach, as well as setting specific thresholds to ensure a minimum of A1 uses. The policy options consider the extent to which interventions should be made to ensure the health of town centres.

- 10.2.2 The following alternatives have been appraised:

Option 1 - Set thresholds for percentage of A1 uses in primary and secondary frontages

Option 2 - No thresholds or different (higher/lower) thresholds for A1 uses.

- 10.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

10.3 Summary appraisal findings

- 10.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix IX**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 10.1: Summary appraisal findings: Town centre uses

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Community Cohesion	=	
Economic Growth	=	
Economic Inclusion	=	
Town Centres	=	
Summary The town centres in Haringey act as the focus for local convenience shopping and community facilities. Given this role, they will contribute to the vitality local communities, and also help to reduce car dependency. Protecting retail in town centres (Option 1) could help to sustain strong and vital centres in the long term; but on the other hand there are arguments to suggest that setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2). If there is greater demand for non-A1 uses than some existing A-class uses, then a restrictive policy would act to constrain the vitality of town centres, with knock-on effects. It is difficult to distinguish between the alternatives, given the changing role of town centres in society. However, it is noted that Haringey has commissioned an evidence base study which in essence says that, given the increasing population in Haringey and the likely increase in disposable income, it is likely that more retailing will be needed in the borough. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.		

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

- 10.4.1 The preferred approach is to introduce a threshold requirement for A1 uses (Option 1). This has been selected in order to ensure that centres retain an element of retail uses, to help ensure their vitality and vibrancy, recognising the need to expand town functions with complementary uses, i.e. recognising current economic realities and changing role of centres. The preferred policy approach has been nuanced in light of the SA in order to permit other uses, and introduce a type of sequential test which identifies a hierarchy of appropriate uses for town centres.

11 NEGATIVE CLUSTERS: HOT FOOD TAKEAWAYS / BETTING SHOPS

11.1 Introduction

- 11.1.1 Both the London Plan and Strategic Policies DPD set out objectives to address human health and social deprivation. In Haringey, evidence has suggested a correlation between obesity and deprivation, as well as the location of betting shops and deprivation. Nationally there is also evidence suggesting a link between fast food and obesity. The concentration of any service, where not serving a wider specialist niche market, can have a detrimental effect on the town centres and communities, constraining the land and space available for other services. The role of town centres is critical to the borough, in providing a location for jobs, services and community activities. There is therefore the opportunity to set more detailed planning policies to deliver these objectives.

11.2 Reasons for selecting the alternatives dealt with

- 11.2.1 The location of betting shops and fast food outlets is, to a degree, already controlled by planning policy. There is an opportunity to explore the impacts of refining the baseline policy position by testing an alternative option, which considers more proactive and stringent controls on the management of the placement of fast food and betting shops.

- 11.2.2 The following alternatives have been appraised:

Option 1 - Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)

Option 2 - No policy - applications assessed against other town centre use policies.

- 11.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

11.3 Summary appraisal findings

- 11.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix X**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 11.1: Summary appraisal findings: Hot food takeaways / betting shops

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Health	★1	2
Community Cohesion	★1	2
Accessibility	=	
Economic Growth	=	
Economic Inclusion	★1	2
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
<u>Summary</u> Overall, in terms of sustainability objectives, Option 1 is clearly best performing. No draw-backs are highlighted by the appraisal. Restricting negative clusters of hot food takeaways and betting shops would likely lead to significant positive benefits in terms of 'health', given the assumption that there would be reduced consumption of fatty foods. There would also be benefits in terms of reduced crime and antisocial behaviour, improved townscape and improved vitality in town centres.		

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

- 11.4.1 The preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.

12 TALL BUILDINGS

12.1 Introduction

- 12.1.1 Tall buildings can contribute to wider strategic objectives for regeneration and economic development, for example, by helping to maximise the use of land, including for new housing. However, tall buildings can have a significant impact on the character and function of local areas and are therefore not appropriate in all locations. The London Plan requires boroughs to identify suitable locations for tall buildings, and to identify these in Development Plan Documents. Haringey's Strategic Policies DPD includes relevant design criteria for tall buildings, however there is an opportunity to set more detailed policies in this regard.

12.2 Reasons for selecting the alternatives dealt with

- 12.2.1 One approach is to develop a detailed policy for the siting and design of tall buildings, taking account of site specific circumstances and local evidence, such as characterisation studies. This option should be considered against a baseline approach, applying the London Plan and Strategic Policies but without further detailed guidance.

- 12.2.2 The following alternatives have been appraised:

Option 1 - Detailed policy for the siting and design of tall buildings, within identified locations, taking account of site specific circumstances and supported by Haringey's Urban Characterisation study

Option 2 - Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD.

- 12.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

12.3 Summary appraisal findings

- 12.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XI**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 12.1: Summary appraisal findings: Tall buildings

Relevant sustainability topics	Option 1	Option 2
Housing	2	★1
Accessibility	=	
Economic Growth	=	
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
Soil and Land Quality	=	
Energy and Carbon	=	
<u>Summary</u>		
Option 1 is best performing in terms of all objectives, other than those relating to 'housing'. Option 1 would restrict tall buildings to particular areas, protecting the borough's townscape and cultural heritage, while still allowing tall buildings in some areas.		
N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.		

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

- 12.4.1 The preferred option is to develop a more detailed DM policy covering the siting and design of tall buildings, which draws on current tall building guidance. This policy will provide that proposals for tall buildings take better account of local and site specific circumstances, and ensure that such development is appropriately located within the borough, having regard to local character and transport accessibility, along with other considerations.
- 12.4.2 One matter raised in the SA is that the approach may restrict the future supply of housing. The DM Policies DPD has been prepared in view of the relevant emerging site allocations focused DPDs, and these have considered and demonstrated the borough’s ability to deliver its strategic housing targets.

13 VIEWS AND VISTAS

13.1 Introduction

- 13.1.1 The Strategic Policies DPD seeks to protect and manage identified regionally strategic views. There are, however, other specific keys views and vistas within the borough that allow a glimpse of important buildings and other features of the urban landscapes. These contribute to local sense of place as well as providing landmarks and a means of wayfinding. Local views and vistas could benefit from additional policy protection, however a balance must be struck to ensure that opportunities for future development are not constrained.

13.2 Reasons for selecting the alternatives dealt with

- 13.2.1 One option is a policy to minimise disturbance to identified local views and vistas, recognising the role that these can play in contributing to local character. This option is set against a baseline option of protecting only London Plan strategic views, which is a less restrictive policy position by comparison.

- 13.2.2 The following alternatives have been appraised:

Option 1 - Policy to minimise disturbance of identified local views and vistas

Option 2 - Only protect London Plan strategic views.

- 13.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

13.3 Summary appraisal findings

- 13.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XII**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 13.1: Summary appraisal findings: Views and vistas

Relevant sustainability topics	Option 1	Option 2
Housing	2	★1
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
<u>Summary</u> A policy to minimise disturbance to identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough's townscape and cultural heritage resources, as compared to only protecting London Plan strategic views (Option 2). Significant positive effects are predicted in terms of townscape/heritage objectives. However, greater protection of identified local views in addition to Local Plan strategic views could place constraints on housing delivery in some areas.		

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

- 13.4.1 The preferred option is for a DM policy which provides stronger protection for identified local views and vistas. The option has particular benefits for sustainability objectives on townscape and cultural heritage.
- 13.4.2 The SA has identified that this option might have the effect of constraining opportunities for the delivery of housing, for example, with taller buildings. The DM Policies DPD has been prepared in view of the relevant Site Allocations DPD, and these have considered and demonstrated the borough's ability to deliver its strategic housing targets.

14 HERITAGE AND CONSERVATION

14.1 Introduction

- 14.1.1 The historic environment makes an important contribution to local character and residents' sense of place. The Strategic Policies DPD therefore broadly aims to maintain and enhance Haringey's historic environment. National planning policy provides that the Council should protect heritage assets in relation to their significance. Therefore, there is scope for the DM Policies DPD to consider the level of policy weight given to particular heritage assets, and how protection of the historic environment should be positively promoted.

14.2 Reasons for selecting the alternatives dealt with

- 14.2.1 Haringey has a wide range of heritage assets including designated, statutory listed assets and other non-designated assets. As the Council has a duty to protect statutory listed assets, this baseline option needs to be taken forward. However, an option promoting stronger protection for non-designated assets is also considered, recognising the value these have to local character. Further, for positively promoting the historic environment, an approach favouring adaptive re-use of all heritage assets is set against the baseline policy position.

- 14.2.2 The following alternatives have been appraised:

Option 1 - Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use

Option 2 - Do not apply policy to non-designated heritage assets.

- 14.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

14.3 Summary appraisal findings

- 14.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XIII**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 14.1: Summary appraisal findings: Heritage and conservation

Relevant sustainability topics	Option 1	Option 2
Health	=	
Housing	2	★1
Economic Growth	2	★1
Townscape and Cultural Heritage	★1	2
Summary A policy focus on non-designated assets in addition to designated assets (Option 1) is likely to result in significant positive effects in terms townscape and cultural heritage objectives, and it is not clear that there are any major draw-backs to this approach. There might be some negative implications for housing and economic growth, but (thinking long-term) heritage assets can help enable regeneration and create a sense of place (with positive implications for economy and community objectives).		

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

- 14.4.1 The approach to provide protection for both designated and non-designated assets (Option 1) is preferred, given the Strategic Policies overarching position to maintain and enhance Haringey's historic environment. The Local Plan needs to help facilitate new development. It is recognised that an overly restrictive policy approach on the historic environment, including non-designated heritage assets, might prohibit new development from coming forward. However the SA has indicated the effect is likely to be limited if the preferred option is implemented, and when considered against the significant effects on objectives for townscape and cultural heritage, the approach is sufficiently justified from a sustainability perspective.

15 CAR FREE OR CAR CAPPED DEVELOPMENTS

15.1 Introduction

- 15.1.1 The Strategic Policies DPD aims to promote sustainable transport options across the borough, recognising in particular the social and environmental benefits involved. The DM Policies DPD will set detailed policy requirements for new development and provides an opportunity to consider how local parking standards may contribute to delivering on the strategic transport objectives.

15.2 Reasons for selecting the alternatives dealt with

- 15.2.1 The Council aims to maximise the use of sustainable transport options and to reduce car dependency. The London Plan sets out car parking standards which seek to restrain car use and reduce congestion, particularly to improve local accessibility. The London Plan standards provide a baseline position that should be appraised. However, recognising that some areas of the borough are well connected to public transport with high levels of accessibility, along with controlled parking measures, it is reasonable to consider a locally specific approach which allows for car free or car capped development in these locations.

- 15.2.2 The following alternatives have been appraised:

Option 1 - Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned

Option 2 - Parking required, in accordance with the London Plan parking standards.

- 15.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

15.3 Summary appraisal findings

- 15.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XIV**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 15.1: Summary appraisal findings: Car free or car capped developments

Relevant sustainability topics	Option 1	Option 2
Health	★1	2
Accessibility	=	
Air Quality	★1	2
Energy and Carbon	★1	2
Sustainable Transport	★1	2
<u>Summary</u> Option 1 (limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone in place or planned) is likely to have greater positive effects in terms of encouraging sustainable transport (significant positive effect), health, air quality and climate change mitigation objectives. With large scale development planned within Haringey, an integrated approach to land use and transport planning that minimises the need to travel and encourages the most sustainable travel choices could have a notable positive effect on reducing transport-related greenhouse gas emissions per capita.		

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

- 15.4.1 The preferred option is one which provides the flexibility for car free or car capped parking (Option 1). The SA reflects that both policy options score positively on sustainability objectives, however there are notable significant positive effects with the preferred option, Further, the preferred option will support delivery of the Strategic Policies, enabling a more flexible approach to promoting sustainable transport options, where local and site specific circumstances allow, reducing car dependency whilst positively impacting on the environment.

16 CARBON OFFSETTING

16.1 Introduction

- 16.1.1 The Strategic Policies DPD sets out a range of policies on climate change adaptation and mitigation, including requirements to reduce energy use and facilitate low and zero carbon development. The DM Policies DPD provides an opportunity to set further detailed policies and guidance which can help to ensure that new development is designed and constructed in a sustainable way.

16.2 Reasons for selecting the alternatives dealt with

- 16.2.1 The Strategic Policies require that carbon reduction targets on new development must be achieved on-site. The London Plan currently provides that London Boroughs can introduce carbon offsetting arrangements in order to achieve carbon reduction targets. An alternative option is therefore to introduce a more flexible local policy requirement to facilitate carbon offsetting, subject to national planning policy and legislation.

- 16.2.2 In light of this discussion, the following alternatives have been appraised:

Option 1 - Carbon offsetting fund to better enable developers to meet carbon targets

Option 2 - No carbon offsetting (CO₂ reductions must be met on site)

- 16.2.3 The reasonable alternatives are slightly modified since February 2015. Specifically, reference to 'allowable solutions' has been removed from Option 1.⁹

16.3 Summary appraisal findings

- 16.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XV**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, '=' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

⁹ The Council had previously proposed an 'Allowable Solutions' DM policy (which included carbon offsetting as one of several potential options for developers to deliver carbon reductions requirements); however since the publication of the Council's Regulation 18 stage consultation document, the Government has indicated it does not intend to progress with the national Allowable Solutions framework. The draft approach has therefore been amended to focus only on carbon offsetting, in line with regional policy.

Table 16.1: Summary appraisal findings: Carbon offsetting

Relevant sustainability topics	Option 1	Option 2
Health	★1	2
Housing	★1	2
Air Quality	★1	2
Energy and Carbon	★1	2
Summary A local carbon offsetting fund (Option 1) could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact on housing could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme. Given that housing quality/condition and issues around fuel poverty are important determinants of health, Option 1 could also improve health outcomes and reduce health inequalities. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.		

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

- 16.4.1 The preferred option is to set a local requirement to enable carbon offsetting (Option 1), as this will provide a more flexible approach for developers to meet the policy requirements, taking account of local and site specific circumstances, and viability considerations. The SA highlights the positive effects resulting from carbon offsetting, including financial contributions ringfenced into a local fund to support local projects, where the impacts of new development will be experienced. The preferred approach will need to be reviewed and considered subject to any relevant Government policy or regulations coming into force.

17 COMMUNITY INFRASTRUCTURE

17.1 Introduction

- 17.1.1 Community infrastructure is integral to the creation of balanced and sustainable communities, promoting social interaction and enhancing the quality of life within local neighbourhoods. Planning for community infrastructure is a key challenge and the Local Plan seeks to ensure the needs of Haringey's existing and future population are met.

17.2 Reasons for selecting the alternatives dealt with

- 17.2.1 Given the likely sustained demand for community infrastructure in the borough, it is reasonable to consider a policy option which broadly supports proposals for new or extended facilities, irrespective of their location. This should be considered against an option which is more prescriptive, setting location specific requirements for development, particularly in view of the spatial strategy growth areas and identified areas of infrastructure need.

- 17.2.2 The following alternatives have been appraised:

Option 1 - Policy to set location requirements for new / extended community facilities

Option 2 - No specific location requirements - accept facilities wherever proposed.

- 17.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

17.3 Summary appraisal findings

- 17.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XVI**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 17.1: Summary appraisal findings: Community infrastructure

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Education	★1	2
Health	★1	2
Community Cohesion	★1	2
Accessibility	★1	2
Skills and Training	★1	2
Economic Inclusion	★1	2
Open Space	=	
Sustainable Transport	★1	2

Summary

Community Infrastructure assets can help to enable regeneration and create a sense of place and improve people's quality of life. Haringey has existing pockets of deprivation and also areas of deficiency for different types of community infrastructure, as well as new growth in the pipeline that will need supporting infrastructure. Therefore, by locating new and enhanced infrastructure in specific locations, Option 1 is more likely to benefit existing and future residents than Option 2 which could take place anywhere in the borough. No draw-backs to Option 1 have been identified.

N.B. Neither option is predicted to lead to a significant effect, hence there is no **green** or **red** shading within this appraisal table.

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

- 17.4.1 The SA has highlighted the significant positive effects of a policy that sets location requirements for community infrastructure (Option 1). The option is preferred as it is more likely to support the creation of sustainable communities through an integrated and plan-led process, rather than an ad-hoc basis. This will help to ensure that infrastructure is situated in areas of growth, where need is identified and in highly accessible locations. Further considerations for infrastructure may be covered by the Site Allocations DPD, however the DM DPD will complement any such policies.

18 OPEN SPACE PROVISION

18.1 Introduction

- 18.1.1 Haringey's Strategic Policies Local Plan seeks to protect and enhance the borough's designated open spaces, as well as improve the quality of and access to this provision. Recognising the limited opportunities for new open space provision within the Borough, it is vital that existing open spaces are protected and enhanced, particularly in areas of identified deficiency.

18.2 Reasons for selecting the alternatives dealt with

- 18.2.1 It is imperative that new developments both maximise the contribution sites make to meeting growth targets and, wherever possible, improve the overall provision of open space. Regulation 18 consultation responses suggested that the Council should apply a more flexible policy approach which allows for the reconfiguration of open space, as this may help developments address site specific constraints in meeting the above noted objectives. The Council considers there is merit in considering this approach against the baseline position of protecting open spaces in their current configuration. Both options are premised on a policy for no net loss of open space.

- 18.2.2 The following alternatives have been appraised:

Option 1 - Policy to allow for the reconfiguration of open space on site development proposals, where there would be no net loss of open space provision

Option 2 - Do not allow for reconfiguration of open space (maintain existing configuration).

18.3 Summary appraisal findings

- 18.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XVII**. The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Table 18.1: Summary appraisal findings: Open space provision

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Health	★1	2
Housing	★1	2
Community Cohesion	★1	2
Biodiversity	★1	2
Townscape and Cultural Heritage	2	★1
Open Space	★1	2
Sustainable Transport	★1	2

Summary

Allowing the reconfiguration of open space should enable targeted improvements to be made to the open space resource in those parts of the borough where there are currently deficiencies. It is likely that the quality of open space, in terms of its potential to support recreational activity and other typical open space uses, will improve. This has positive implications in terms of a range of objectives, with significant positive effects predicted in terms of 'health'. It is also the case that targeted enhancements should enable biodiversity (Green Grid) opportunities to be realised, to a significant extent. A policy of enabling reconfiguration does, however, lead to some risks in terms of 'Townscape and Cultural Heritage' given that reconfiguration might well involve a change to the existing character of the open space. More generally, there is the possibility that reconfiguration of numerous open spaces could have unforeseen effects in the long term, and so monitoring will be important.

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

- 18.4.1 The preferred approach supports the spatial strategy in seeking to deliver sustainable development through the provision of high quality, well designed and accessible open spaces. Given the limited opportunities for significant increases in the quantum of open space across the Borough, there is a need to maximise the value of existing open space. Reconfiguration can be an effective approach to addressing identified deficiencies, overcoming functional issues as part of re-provision and may provide windfall opportunities as part of the Borough's Green Grid. It also provides sufficient flexibility for proposals to overcome site specific constraints to deliver not only improved open space provision, but also other requirements needed to support the spatial strategy.

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

19 INTRODUCTION (TO PART 2)

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

20 APPRAISAL OF THE DRAFT PLAN

- 20.1.1 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.

20.2 Methodology

- 20.2.1 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach – i.e. the proposed Partial Review - on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

• Crime	• Economic inclusion	• Flood risk and climate change
• Education	• Town centres	• Air quality
• Health	• Biodiversity	• Noise
• Housing	• Townscape and cultural heritage	• Energy and carbon
• Community cohesion	• Open space	• Waste management
• Accessibility	• Water resources	• Sustainable transport
• Economic growth	• Soil and land quality	
• Skills and training		

- 20.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.

- 20.2.3 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

- 20.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹⁰ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

20.3 Crime

- 20.3.1 **DM 01** (Delivering High Quality Design) establishes that any new development proposal should be designed to make a positive contribution to a place. High quality design can help contribute to the reduction in crime levels as well as the fear of crime. Further benefits will result from **DM 02** (Accessible and Safe Environments), which requires development proposals to secure inclusive environments that can be used safely.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

- 20.3.2 **DM 09** (Management of the Historic Environment) promotes the adaptive reuse and enabling development of heritage assets, encouraging redevelopment of buildings that may not otherwise be developed due to their sensitivity. This positive policy approach should reduce the number of vacant, derelict or dilapidated buildings in the borough and therefore reduce the potential for crime and anti-social behaviour. Furthermore **DM 42** (Primary and Secondary Frontages) respond to the issue of vacant units in making provision for meanwhile uses.
- 20.3.3 Other policies that could have implications for crime include:
- **DM 08** (Shopfronts, Signs and On Street Dining) requires shopfronts to contribute to a safe and attractive environment
 - **DM 03** (Public Realm) requires advertisements to contribute to a safe and attractive environment.
- 20.3.4 In **conclusion**, the proposed approach to DM policy should have the effect of reducing levels of crime in Haringey. It has a focus on adaptive re-use and developing vacant and derelict buildings (including historic buildings), and policies also seek to use positive design in order to 'design-out' crime and reduce the fear of crime. However, it is not clear that significant effects will result, given the wider determinants of crime.

20.4 Education

- 20.4.1 The approach set out in **DM 48** (Use of Planning Obligations) and **DM 40** (Loss of Employment Land and Floorspace) establishes that planning contributions will be sought to facilitate opportunities for local employment training, including apprenticeships and work experience placements, in line with Policy SP9. This helps ensure that education after school age is still available for the local population.
- 20.4.2 **DM 49** (Managing the Provision and Quality of Community Infrastructure) seeks to protect existing community infrastructure and ensure that new development delivers the required supporting infrastructure and also additional infrastructure in suitable locations, delivering identified infrastructure listed in the Infrastructure Delivery Plan (IDP). These two policies seek to protect existing infrastructure (including education facilities) and, where necessary, extend or enhance existing infrastructure or provide new facilities.
- 20.4.3 In **conclusion**, the proposed policies around education infrastructure seek to increase the quantity, quality and accessibility of provision in the borough, enhancing existing infrastructure and delivering new infrastructure where necessary in order to support growth. It is, however, not possible to conclude significant positive effects given the role played by the IDP.

20.5 Health

- 20.5.1 **DM 02** (Accessible and Safe Environments) and **DM 03** (Public Realm) require all developments to secure healthy environments to help promote healthy lifestyles and in the long term prolong life expectancy and improve well-being. A means of achieving this is through the creation of good quality accessible open space that also provides outdoor sports facilities.
- 20.5.2 **DM 20** (Open Space and Green Grid) seeks to ensure that open space is protected from inappropriate development and positively responds to the need to increase the quality of, and accessibility to, the Borough's network of green and open spaces. It also sets requirements for larger sites in Areas of Open Space Deficiency, setting out how they should provide new open space or improve existing open space. This should encourage exercise and recreation for existing and future residents. The Council also promotes the provision of leisure facilities on these open space areas so to promote healthy lifestyles while using these areas.

- 20.5.3 **DM 23** (Environmental Protection) focuses on protecting the environment from the adverse effects of human activities, as well as seeking to ensure that building occupants and other people in the Borough are not adversely impacted by new development. Through the mitigation of negative effects on air quality during construction and the lifetime of developments, the health of nearby residents should be protected. Furthermore this policy recommends that new development will only be permitted where it is demonstrated that any risks associated with land contamination, including to human health, is addressed beforehand.
- 20.5.4 **DM 47** (Hot Food Takeaways) strongly supports the restriction of hot food takeaway shops 400m from primary and secondary schools and the granting of planning permission for hot food take-away shops outside this exclusion zone has strong requirements that it must meet. This should help to address obesity for residents in Haringey, particularly for children attending secondary school.
- 20.5.5 **DM 31** (Sustainable Transport) promotes active travel (cycling and walking) which should help encourage healthy lifestyles; and also promotes improved public transport which is likely to lead to minor improvements in air quality through displacing car users, reducing emissions and pollution from road transport.
- 20.5.6 Other policies that could have implications for health include:
- **DM 19** (Nature Conservation) seeks to protect and enhance the nature conservation value of designated sites, including those which are publicly accessible
 - **DM 20** (Open Space and Green Grid) promotes a network of open spaces through the London Green Grid
 - **DM 47** (Betting shops) seeks to address the health impacts of negative clustering of uses
 - **DM 58** (Managing the Provision and Quality of Community Infrastructure) states the Council will resist the loss of existing social and community facilities.
- 20.5.7 In **conclusion**, the proposed policy approach focuses on improving the health and wellbeing of the local residents through increasing access to and quality of open space; restricting the locations in which hot food takeaways and betting shops can operate; and encouraging active travel and sustainable transport. The DM Policies DPD should result in **significant positive effects** on the health of local residents.

20.6 Housing

- 20.6.1 **DM 01** (Delivering High Quality Design) and **DM 12** (Housing Design and Quality) underline how all new development needs to be built to a high quality using sustainable design and construction techniques. The creation of balanced communities is supported in **DM 11** (Housing Mix) through the provision of housing developments providing a mix of tenure type for housing across the Borough, particularly to address areas that have imbalances in provision, such as affordable rented housing dominating or where affordable rented housing is under represented.
- 20.6.2 **DM 10** (Housing Supply) sets out the housing delivery aims for the London Borough of Haringey, which expects the maximum appropriate contribution of housing on all sites across all tenures and loss of existing housing only when the housing is replaced with at least equivalent floorspace. **DM 11** (Housing Mix) provides flexibility in the application of the London Plan density matrix, and should help meet a good portion of the markets needs while still being of high quality.

- 20.6.3 Affordable housing levels will be increased through **DM 13** (Affordable Housing), which in line with SP2 of the Strategic Policies, sets the target tenure mix for affordable housing on new development sites, having regard to from viability assessments for each proposal. Furthermore with the 'tenure blind' approach set out in DM 12 (Housing Design and Quality) houses will be better integrated with each other. The current Local Authority housing stock is encouraged to be improved upon through **DM 21** (Sustainable Design, Layout and Construction) with the promotion of sustainable retrofitting. Such improvements can make a vast difference in providing better quality housing for the residents.
- 20.6.4 **DM 15** (Specialist Housing) focuses on the provision of specialist housing, which includes sheltered housing and care homes, housing for older people, student accommodation and hostel accommodation. There is a growing demand for older people's housing as people are living for longer and remaining economically active for longer, and older people's housing can help older people to retain independence and to ensure that older people are not isolated or detached from their communities. Bespoke specialist housing has the potential to deliver more appropriate housing for those that need it, whilst freeing up/preventing the loss of housing stock for families.
- 20.6.5 Loss of larger and family housing to Houses in Multiple Occupation (HMOs) or smaller self-contained homes is a key issue in Haringey. **DM 17** (Houses in Multiple Occupation) seeks to restrict the conversion of housing into HMOs so that Haringey can maintain a stock of larger homes in the priority areas for families, and to reduce the risk of the larger housing stock from being completely converted. **DM 16** (Residential Conversions) seeks to restrict conversions in specified areas of the Borough. The policies do not completely restrict HMOs and housing conversions altogether but do strengthen the requirements so that HMOs and conversions that do come forward are higher quality and in more accessible locations. Maintaining diversity in the housing stock will lead to secondary benefits in terms of diversity in the community.
- 20.6.6 Other policies that could have implications for housing include:
- DM 01 (Delivering High Quality Design) through promoting environments that are well designed and sensitive to the local context
 - DM 06 (Building Heights)
 - DM 11 (Housing Mix) through promoting a mix of housing types, density and tenure
 - DM 14 (Self-build and Custom Build Housing) seeks to support this type of housing
 - DM 18 (Basement development and lightwells)
 - DM 51 (Warehouse living) will only be allowed in locations where they are supported by site-specific allocations.
- 20.6.7 In **conclusion**, the proposed policies focus on ensuring that Haringey maintains a mix of housing in order to meet housing needs, that new development is mixed in tenure, allowing for regeneration, renewal and refurbishment of the existing dwelling stock where necessary. As such, the DM Policies DPD should lead to **significant positive effects**. Furthermore, flexibility over higher housing densities will be permitted (subject to criteria) which will assist Haringey in meeting its housing targets in a highly built-up borough.

20.7 Community cohesion

- 20.7.1 The policies with perhaps the greatest bearing on community cohesion are those that deal with community infrastructure. **DM 49** (Managing the Provision and Quality of Community Infrastructure) seeks to protect existing community infrastructure and to ensure that new development delivers the required supporting infrastructure and also additional infrastructure in suitable locations, delivering identified infrastructure listed in the Infrastructure Delivery Plan. The policy seeks to protect existing infrastructure and, where necessary, extend or enhance existing infrastructure or provide new facilities. This should lead to benefits in terms of increasing accessibility to community infrastructure and encouraging social cohesion and fostering social capital.
- 20.7.2 The way buildings are placed and how they interact with each other can play a major role in the community cohesion of an area. High quality design can create environments that promote a sense of cultural identity and bring people together. **DM 01** (Delivering High Quality Design) encourages this through requiring new development to demonstrate how they relate positively to neighbouring structures to create a harmonious whole and how they will make a positive contribution to a place. Furthermore, **DM 02** (Accessible and Safe Environments) seeks to create inclusive environments that do not discriminate against people regardless of their ethnicity, gender, age, disability, childcare responsibilities or economic circumstances. The inclusive design requirements should lead to benefits in terms of supporting strong relationships between people from different backgrounds and communities.
- 20.7.3 Local distinctiveness can be enhanced in new developments through high quality public realm, including public art, as set out in **DM 03** (Public Realm). This has the potential to create a sense of cultural identity and brings more uniqueness to the area of Haringey.
- 20.7.4 **DM 11** (Housing Mix) seeks to create a more balanced mix of tenure in housing areas, which will result in strong relationships between people from different backgrounds and communities. This will create more community cohesion that is greatly beneficial for the area especially with the Tottenham riots that highlight a need for this.
- 20.7.5 Other policies that could have implications for community cohesion include: **DM 12** (Housing Design and Quality), which calls for a 'tenure blind' approach to mixed tenure residential development proposals to ensure homes across tenures are indistinguishable.
- 20.7.6 In **conclusion**, the proposed approach to addressing community infrastructure through the DM Policies DPD seeks to increase quantity, quality and accessibility in relation to community infrastructure, enhancing existing infrastructure and delivering new infrastructure where necessary. The policies should therefore lead to **significant positive effects** in terms of access to community infrastructure and other community related objectives. Furthermore, cultural identity, belonging and well-being will be promoted through public art schemes, and higher quality in design supporting a more harmonious public realm. More generally, strong relationships between people from different backgrounds and communities are encouraged through efforts to ensure inclusive environments that do not discriminate against anyone and through the promotion of a mix of tenure housing. The Tottenham riots of 2011 highlight the need of greater community cohesion in the borough.

20.8 Accessibility

- 20.8.1 The improvement of accessibility to facilities is promoted through **DM 02** (Accessible and Safe Environments) through requiring development to be used safely with easy accessibility for all members of the community. This will assist in reducing inequalities in accessibility for disabled people, parents with small children and those with limited mobility. The improvement of access to open space and other leisure facilities is sought for in **DM 20** (Open Space and Green Grid) through the requirement of new developments to improve upon or create new open space and to contribute to enhancing the network of green and open spaces.

- 20.8.2 **DM 31** (Sustainable Transport) focuses on the promotion of sustainable transport, especially where development will lead to high trip generation rates. This focuses on the protection, improvement and creation of pedestrian and cycle routes. This would not only improve transport links for the borough, it would also likely decrease CO₂ emissions and pollution emitted and lead to positive health effects.
- 20.8.3 Proposals for new and extended social and community facilities are required to be located where they are accessible by public transport, walking and cycling, according to **DM 49** (Managing the Provision and Quality of Community Infrastructure). This should ensure good access to essential services and facilities, and help provide access for all people across a number of transport modes. The policy also seeks to protect against the loss of social and community infrastructure.
- 20.8.4 Other policies that could have implications for accessibility include:
- DM 01 (Delivering High Quality Design)
 - DM 03 (Public Realm)
 - DM 41 (New Town Centre Development) seeks to sustain and enhance Haringey's established town centre hierarchy in order to ensure services and facilities are focussed around highly accessible locations
 - DM 54 (Facilitating Telecommunications Development) seeks to enable residents and businesses to fully benefit from modern telecommunications, including online access to services.
- 20.8.5 In **conclusion**, steps are set to be taken to improve the accessibility of the key services and facilities in Haringey; and there is support for sustainable transport, especially for developments that have high trip generation rates. Notably, key services will be required to locate in areas easily accessible by public transport, and new leisure facilities are required to be easily accessible by all members of the community. It is understood that additional work around delivery of community infrastructure will be progressed in line with the updated Infrastructure Delivery Plan (IDP); and on that basis significant positive effects are not predicted.

20.9 Economic growth

- 20.9.1 **DM 40** (Loss of Employment Land and Floorspace) seeks to maintain existing employment land provision, including non-allocated employment land. This should help facilitate economic growth by safeguarding sites for economic and employment purposes.
- 20.9.2 **DM 37** (Maximising the Use of Employment Land and Floorspace) seeks to maximise the use of employment land within the borough through a gradual restructuring of the borough's employment land portfolio. This is to enable the modernisation of old stock where this is no longer suited to current needs, to attract a wider range of businesses to the borough, and to regenerate employment land in highly accessible areas. Improving employment sites and increasing job densities should assist in delivering further opportunities in terms of local jobs as well as a possibility of a shift towards higher paid sectors.
- 20.9.3 The Council recognises, however, that there remains a demand for sites which are more suited to traditional industrial activities and the Local Plan seeks to ensure sufficient provision to meet local need in this regard. Additionally **DM 38** (Employment Led Regeneration) and **DM 51** (Warehouse living) support the regeneration of designated sites to provide mixed-use developments "where this is necessary to facilitate renewal and regeneration", taking account of viability considerations.
- 20.9.4 **DM 41** (New Town Centre Development) supports Haringey's town centre hierarchy and sets criteria for new developments outside recognised town centres to ensure that they satisfy the sequential test in the National Planning Policy Framework.

- 20.9.5 It is also worth noting that a number of other policies could have implications for economic growth, albeit to a lesser extent. These policies include:
- DM 10 (Housing Supply) and DM 11 (Housing Mix) seek to meet housing need sustainably in the borough. New housing in sustainable locations could benefit economic growth by increasing the size of the workforce in the borough and the quality and affordability of housing; potentially attracting businesses to the area.
 - DM 31 (Sustainable Transport) seeks to improve public transport, walking and cycling provision which could improve accessibility to work for employees as well as encourage people to travel and spend money within the local economy.
 - DM 20 (Open Space and Green Grid) would improve the quality of the natural and built environment. This could help draw businesses to the borough through providing a high quality environment which is attractive to business.
 - DM 54 (Facilitating Telecommunications Development) seeks to maximise the sustainable economic benefits of modern telecommunications infrastructure.

- 20.9.6 **In conclusion**, policies should lead to widely enhanced local employment opportunities and facilitate redevelopment of under-used employment sites. The net effect should be to grow and diversify the local economy, and hence **significant positive effects** are predicted; however, there may be some instances where particular sectors find it more difficult to operate in Haringey.

20.10 Skills and training

- 20.10.1 **DM 48** (Use of Planning Obligations) seeks to create local opportunities for employment and training including both apprenticeships and work experience in line with Policy SP9. This would aid in the up skilling of the local labour force and would provide opportunities for the unemployed.
- 20.10.2 As per the **recommendation** made within the Interim SA report (February 2015), the Council will seek opportunities for locally sourced labour in the construction phase of development, as set out in **DM 21** (Sustainable Design, Layout and Construction).
- 20.10.3 **In conclusion**, policies are unlikely to lead to significant effects however there are likely to be some minor positive effects where opportunities for skills are provided through planning obligations.

20.11 Economic inclusion

- 20.11.1 **DM 13** (Affordable Housing) seeks to ensure that the maximum reasonable amount of affordable housing provision is secured, in line with Strategic Policy SP2. This would likely allow more financially constrained residents have a better physical accessibility to local and London-wide jobs and opportunities; and allow those on low incomes to access employment opportunities that they would not otherwise be able to access if required to pay full market rates.
- 20.11.2 **DM 37** (Maximising the Use of Employment Land and Floorspace) seeks to maximise employment densities on sites and deliver a higher number of jobs through modernising stock and intensifying the land use. This may lead to positive effects in terms of attracting prospective employers to Haringey as well as delivering new jobs that can potentially be taken up by local residents.
- 20.11.3 **DM 38** (Employment Led Regeneration) seeks to facilitate employment development on selected sites where viability issues would otherwise limit potential for employment generating uses. This will have positive effects in terms of ensuring sites fully contribute to making provision for local jobs; however, it is recognised that a shift in the employment land portfolio could have some negative implications for those that rely on more traditional industry.

- 20.11.4 **DM 39** (Warehouse Living) allows a bespoke housing product within designated areas. Warehouse living units can help facilitate flexible working patterns through encouraging new housing in sustainable locations that enable the user to work within the unit.
- 20.11.5 **DM 48** (Use of Planning Obligations) seeks to create local opportunities for employment and training through apprenticeships and work experience in line with Policy SP9. This would aid in the up skilling of the local labour force and would improve accessibility to local employment opportunities delivered through the plan, and also London-wide jobs planned elsewhere.
- 20.11.6 In **conclusion**, the preferred approach is likely to lead to positive effects in terms of economic inclusion through delivering additional jobs, affordable housing and supporting employment led regeneration and warehouse living units where suitable. However, it is not clear that significant positive effects will result, given some uncertainties around the link between the nature of jobs available (now and in the future) and the characteristics of the local workforce.

20.12 Town centres

- 20.12.1 **DM 01** (Delivering High Quality Design) and **DM02** (Accessible and Safe Environments) should ensure that development proposals accord with the design principles for the locality as well as national and regional policy. The policies expect proposals to apply and incorporate development design in accordance with the particular area's characteristics while conserving or enhancing local biodiversity interest. In doing so it should lead to significant positive impacts in supporting local distinctiveness and build quality while minimising impact on the local environment. Similarly, **DM 05** (Locally Significant Views and Vistas) should also help to conserve the borough's local character through the need for proposals to demonstrate that they would minimise disturbance to any Locally Significant Views.
- 20.12.2 **DM 08** (Shopfronts, Signs and On Street Dining) and **DM 03** (Public Realm) both seek to ensure that development is appropriate in design and appearance, compatible with its surroundings and that it retains important landscape features. In particular **DM 08** seeks to protect the identity and quality of the town centre; and seeks to ensure that replacement buildings will actually bring about improvements and conversions which positively contribute to the established local character and sense of place.
- 20.12.3 With regard to town centre development, **DM 42** (Primary and Secondary Frontages), **DM 43** (Local Shopping Centres) and **DM 44** (Neighbourhood Parades and Other Non-Designated Frontages) seek to maintain and enhance existing provision and provide an appropriate range of facilities and services; provide opportunities for commercial development including retail and leisure; improve and enhance vitality and viability and improve the links between employment, shopping and services. This approach should help improve the attractiveness and vitality of town centres, in particular at Wood Green as the borough's principal centre and a Metropolitan Centre in the London Plan.
- 20.12.4 **DM45** (Maximising the Use of Town Centre Land and Floorspace) supports the diversification of town centres to help support their vitality and viability. The policy seeks the beneficial use of underused or vacant upper storeys or town centres and other town centre sites, including through appropriate mixed use development.
- 20.12.5 **DM 41** (New Town Centre Development) seeks to protect the borough's established town centre hierarchy and sets a criteria for new developments outside recognised town centres to ensure that they satisfy the sequential test in the National Planning Policy Framework. This policy should preserve the role and function of settlements in the borough and ensure that 'out of town' retail complements town centre uses.
- 20.12.6 **DM 46** (Betting Shops) and **DM 47** (Hot Food Takeaways) seek to ensure that and hot food takeaway and betting shops do not cluster and significantly affect the quality of the environment in centres. The policies seek to protect the identity and quality of the town centre, recognising that cluster of these uses can affect the character of a centre, and that there needs to be a variety of shops and services on the high street.

- 20.12.7 In **conclusion**, the proposed approach is likely to help to ensure that vitality and vibrancy of town centres can be enhanced, whilst ensuring that the borough's town centres are easily accessible and meet local needs and requirements. Policies seek to promote high quality design and public realm and address potential clusters of hot food takeaways and betting shops that can be detrimental to centres. **Significant positive effects** are likely.

20.13 Biodiversity

- 20.13.1 The borough contains a range of wildlife sites, in addition to non-protected areas of importance to biodiversity in the wider landscape, such as wildlife corridors. **DM 19** (Nature Conservation) seeks to protect and enhance the diversity and richness of the borough's flora and fauna to provide a rich and varied landscape and ecological foundation to Haringey. The policy also aims to provide protection to existing ecological assets and enhance the contribution these make to the local landscape character. In line with this, **DM 20** (Open Space and Green Grid) seeks to protect and enhance the ecological benefits of open space and outlines that proposals for any local open space improvements must not have a detrimental impact on nature conservation and biodiversity. Additionally **DM 20** seeks to ensure that all new development providing new or replacement open space connects that provision to the All London Green Grid.
- 20.13.2 The approach outlined in **DM 21** (Sustainable Design, Layout and Construction) addresses the important contribution vacant roof space and vertical surfaces can have to climate change adaptation when being used for urban greening, albeit acknowledging that in some cases such approaches will be impractical.
- 20.13.3 Policy **DM 25** (Sustainable Drainage Systems) seeks to maximise the biodiversity benefits of this water management infrastructure, however the full extent of benefits are uncertain as these will vary on a case by case basis and depending on the drainage techniques used.
- 20.13.4 In **conclusion**, the proposed policies would likely result in **significant positive effects** in terms of biodiversity, through protecting and enhancing designated and non-designated sites, providing greater connectivity between sites and delivering enhanced open and green space provision.

20.14 Townscape and cultural heritage

- 20.14.1 Townscape character and cultural heritage are given due consideration through **DM 01** (Delivering High Quality Design), **DM 02** (Accessible and Safe Environments) and **DM 03** (Public Realm) as development proposals are required to deliver high quality design and demonstrate how they respond to the character of the development site and the surrounding area/street scene. This should ensure that new development complements surrounding buildings and enhances the character of Haringey.
- 20.14.2 Locally Significant Views are important visual corridors in Haringey. **DM 05** (Locally Significant Views and Vistas) aims to manage these views by requiring development proposals to demonstrate how they will harness the opportunities these views present and minimise disturbance on these views. This will assist in protecting the visual amenity of Haringey from insensitive or out of character development.
- 20.14.3 **DM 06** (Building Heights) helps to protect the local and historic environment by ensuring that tall and large buildings are situated in appropriate locations and do not result in unacceptable impacts on townscape character, cultural heritage and its setting. Furthermore the Council is seeking the retention of traditional shopfronts of distinctive character that contribute to the visual, architectural or historic quality of the local townscape via **DM 08** (Shopfronts, Signs and On Street Dining). Also, advertisements are to be more tightly controlled through **DM 03** (Public Realm). There is a requirement for adverts to be of a high standard and sensitive to their visual appearance on buildings; especially in the case of listed buildings and conservation areas.

- 20.14.4 **DM 09** (Management of the Historic Environment) requires development proposals in designated Archaeological Priority Areas to be assessed and evaluated prior to development; and may require significant finds to be excavated or preserved in situ. This would ensure that potential archaeological heritage is protected and not sterilised by development.
- 20.14.5 **DM 09** (Management of the Historic Environment) will ensure that heritage assets and their setting are preserved and enhanced in a manner which is consistent with their significance. DM 12 supports proposals that secure the preservation, conservation or enhancement of heritage assets and their settings, outlines when loss of a heritage asset, would be acceptable, sets out the support for adaptive reuse of buildings and criteria in respect of enabling development. The policy supports the sensitive refurbishment and redevelopment of heritage assets, subject to criteria, provided the development retains and enhances the significance of the asset. The policy recognises that heritage assets can as a foundation for regeneration of the wider area. These policies contribute to the positive use of historic assets in Haringey and the sustainable and sensitive redevelopment of them to help meet identified needs but also retain cultural heritage assets.
- 20.14.6 Other policies that could have implications for townscape and cultural heritage include DM 50 (Public Houses), which specifies that any change of use should not affect significant features of historic or character value.
- 20.14.7 In **conclusion**, the proposed approach would lead to **significant positive effects** on development in terms of the townscape and cultural heritage. Policy will be in place to protect and enhance existing assets, including heritage assets, but also allow them to be modified where appropriate. Locally Significant Views will be protected and policy seeks to site tall and taller buildings in the most appropriate locations.

20.15 Open space

- 20.15.1 The approach set out in **DM 19** (Nature Conservation) set out that development should not to lead to adverse effects on designated and other non-designated nature conservation sites and that the value of these sites will be protected. Where proposals cannot reasonably avoid harm to nature conservation sites, it requires appropriate mitigation measures to be implemented.
- 20.15.2 **DM 26** (Open Space and Green Grid) seeks to ensure that the boroughs open space and similarly designated land are enhanced and protected from inappropriate development. This should also result in positive effects as it will ensure that development proposals do not lead to the whole or partial loss of open spaces without an assessment of the current level of provision, and the creation of a suitable replacement where necessary or financial contributions to enable the provision of new open spaces. The policy also provides for the reconfiguration of open space where this would have demonstrable improvements in the quality of and access to open space.
- 20.15.3 **DM 26** (Open Space and Green Grid) also outlines the requirements to where possible, to connect all new or replacement open space, to the All London Green Grid. This policy will contribute a positive effect to the boroughs open space by promoting access to open space through the use of pedestrian and cycle linkages within and between the Green Grid.
- 20.15.4 Other policies that could have implications for open space include: DM 34 (Environmental Protection); DM 01 (Delivering High Quality Design); DM 03 (Public Realm); and DM 48 (Use of Planning Obligations).
- 20.15.5 In **conclusion**, policy measures should help to ensure that **significant positive effects** are achieved against the baseline, particularly through improving the quality of existing open spaces. As per the **recommendation** from the Interim SA Report (February 2015), the DM Policies have been revised to emphasise the role which enhancements to open space can make in terms of green infrastructure and the Green Grid.

20.16 Water resources

- 20.16.1 **DM 18** (Residential Basement Development and Lightwells) provides criteria for planning applications for basement development and lightwells. The policy has a general reference to development not causing harm to the natural environment. It also contains specific reference to not causing harm to the local water environment, ground conditions and biodiversity. This would provide protection to both surface water and groundwater resources.
- 20.16.2 **DM 21** (Sustainable Design, Layout and Construction) requires new development to fully consider incorporating living roofs and green walls into their design as far as it is practicable to do so. While living roofs and green walls are primarily promoted in order to manage water run-off rates, they can also have benefits in terms of improving the quality of run-off water.
- 20.16.3 **DM 24** (Managing and Reducing Flood Risk) focuses on managing flood risk and contained overall key principles when designing schemes in flood prone areas. These principles include contributing to the naturalisation of watercourses and managing water and waste water discharges (in line with **DM 29**, On-site Management of Waste Water and Water Supply), both of which would be expected to contribute positively to enhancing to quality of the borough's water resources.
- 20.16.4 **DM 25** (Sustainable Drainage Systems) promotes the use of Sustainable Drainage Systems (SuDS) for developments. While the focus of SuDS tends to be primarily on managing water run-off and infiltration rates, the policy states that systems should also be designed to result in a net improvement in water quality and provide for clean and safe water at the surface.
- 20.16.5 **DM 27** (Protecting and Improving Groundwater Quality and Quantity) focuses on protecting groundwater and requires, amongst other things, that development does not adversely affect groundwater quality during design, construction or operation. The policy gives further direction specifically on limiting disturbance to natural groundwater flows and emphasises that planning permission will be refused where development presents unacceptable risks to groundwater in source protection zones (SPZs).
- 20.16.6 **DM 28** (Watercourses and Flood Defences) promotes the naturalisation of watercourses, in accordance with the Thames River Basin Management Plan and the London River Restoration Action Plan. The policy also provides direction on culverts, stating that there is general presumption against development where culverting would adversely affect the functioning of main rivers and ordinary watercourses. Furthermore, development on sites already containing culverted watercourses, are expected to investigate measures to restore sections of the watercourse.
- 20.16.7 **DM 29** (On-site Management of Waste Water and Water Supply) covers surface water and waste water drainage with the onus on the Council (working with Thames Water) to ensure that there is adequate capacity in the local public sewer network to meet existing and future foreseeable demand. Where connection to the local public sewer is not available for a proposed development, alternative (non-mains) drainage options would be considered but would be subject to control by the Council. The policy also provides the Council with the ability to restrict non-mains drainage in SPZs.
- 20.16.8 In **conclusion**, the proposed policies related to water resources are expected to have a positive effect in terms of ensuring the protection of water resources at the planning applications stage. Policy will also encourage naturalisation / restoration of watercourses in some cases. As per the **recommendation** made in the Interim SA Report (February 2015), the supporting text to policy DM28 has been amended slightly to set out further detail about where opportunities for site deculverting should be investigated.

20.17 Soil and land quality

- 20.17.1 The Greater London Authority has identified 29 Previously Developed Land (PDL) sites in Haringey, which cover 84.9ha of land. The vast majority (86%) of PDL is already allocated within the Unitary Development Plan or already have planning permission and only 2% of sites are without planning permission. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL.
- 20.17.2 The growth aspirations for the borough mean that redevelopment of PDL is likely. The DM Policies DPD as currently drafted does not provide any policy direction promoting the development of PDL; however this is not considered necessary given that 86% of PDL in the Borough has either already been allocated or has planning permission for redevelopment.
- 20.17.3 PDL can often be contaminated and the borough does contain a number of contaminated sites due to historical industrial uses. Where redevelopment of PDL is proposed, **DM 23** (Environmental Protection) contains protections to manage risks to human and environmental health from potentially contaminated land. The redevelopment of contaminated land (including land containing derelict buildings) could help the remediation of brownfield land.
- 20.17.4 Other policies that could have implications for soil and land quality include DM 25 (Sustainable Drainage Systems), which promotes the use of SuDS for new development but recognises that on some sites, land contamination issue may make the use of SuDS impractical. In these instances, an alternative approach is advocated.
- 20.17.5 In **conclusion**, it is considered that DM 23 would ensure that the potential environmental and human health risks of development on contaminated land would be adequately considered and managed through the planning process. Significant effects are, however, unlikely.

20.18 Flood risk and climate change

- 20.18.1 Flood risk is greatest in the east of the borough with Tottenham Hale being the worst affected ward in the borough with more than 50% lying within Flood Zone 2 (low to medium risk of flooding). Northumberland Park to the north of Tottenham Hale is also largely within Flood Zone 2. The wards of Tottenham Green, Seven Sisters and West Green contain smaller areas lying in Flood Zone 2 and Alexandra and White Hart Lane have very small areas at risk from flooding. It should also be noted that small areas within Northumberland Park, Tottenham Hale and Seven Sisters lie within Flood Zone 3, which is land with a high risk of flooding.
- 20.18.2 Amongst other things, climate change is predicted to increase the intensity of rainfall which has the potential to increase flood risk in the borough. This is particularly an issue given the growth aspirations in the Local Plan. Traditionally, urban development has led to an increase in impervious hard surfaces (e.g. roads, car parks, roofs etc.) which typically increases run-off rates from what they would be naturally.
- 20.18.3 **DM 18** (Residential Basement Development and Lightwells) sets out the principles for basement development and lightwells. A major focus of this policy is on ensuring that development, whether underground or above ground, will not cause adverse flooding effects. For proposed underground works a particular additional consideration of the policy is ensuring that development does not increase the risks posed to people and property by flooding. This is a particular consideration for basement extensions to provide habitable rooms.
- 20.18.4 **DM 21** (Sustainable Design, Layout and Construction) promotes the use of living roofs and green walls for development, where it is practicable to do so. Living roofs and green walls can act to absorb rainfall while ultimately reduces runoff and helps to reduce flood risk.

- 20.18.5 **DM 24** (Managing and Reducing Flood Risk: Key principles), **DM 25** (Sustainable Drainage Systems) and **DM 26** (Critical Drainage Areas) will work together to ensure that new development gives due regard to assessing and mitigating flood risk. This means ensuring that the development itself is not subject to an unacceptably high level of risk as well as ensuring that the development does not increase flood risk elsewhere. DM 24 requires a flood risk assessment (FRA) to be undertaken to inform development in flood risk areas. This is likely to be required for flood risk areas in the east of the borough. It is noted also that in developing the Haringey Local Plan, a Strategic FRA was used to inform (amongst other things) the siting of proposed development (referred to as the 'sequential test'). DM 25 requires the use of sustainable drainage system (SuDS) for new development with the primary aim of reducing surface water run-off, which has been identified as the main cause of flooding in the borough. DM 26 contains particular requirements for nine areas in the borough which have been identified as critical drainage areas (CDAs). For development in these areas, additional assessment requirements will apply, recognising that there is higher risk.
- 20.18.6 **DM 28** (Watercourses and Flood Defences) applies to sites containing flood defences or in close proximity to flood defences. The policy stipulates minimum separation distances between development and investigating opportunities to remove hard flood defences. It also promotes the investigation of naturalising existing modified watercourse (e.g. through the removal of culverts and hard landscaped channels etc.). Naturalised watercourses can help to reduce the speed of water run-off and offer greater capacity for flood storage.
- 20.18.7 Other policies that could have implications for flood risk and climate change include:
- DM 29 (On-site Management of Waste Water and Water Supply)
 - DM 34 (Driveways and front gardens)
 - DM 21 (Sustainable Design, Layout and Construction).
- 20.18.8 In **conclusion**, the proposed DM policies provide for an adequate site specific assessment, proportionate to the risk (e.g. Flood Zone 2, Flood Zone 3 or CRA). Policies will also require the use of SuDS for all new development, which is considered highly beneficial. Overall, it is considered that the Plan contains adequate policies to manage flood risk and that there will be a minor positive effect.

20.19 Air quality

- 20.19.1 The whole borough is designated as an Air Quality Management Area (AQMA) for PM10 and NO₂. Major roads provide a significant proportion of PM10 and NO₂ emissions in Haringey. There are no sites within the borough, which are listed as producing emissions to air under the Environment Agency's Pollution Inventory although the Edmonton Solid Waste Incinerator is located just beyond the north-east boundary of the borough.
- 20.19.2 **DM 23** (Environmental Protection) ensures that the effects on air quality of new development are assessed and adequately mitigated. Furthermore, the policy would also mean where air quality assessment are required, they assess the potential effect of air quality on proposed development. This is intended to address air quality having an adverse effect on newly introduced receptors (e.g. if a new residential development was proposed in close proximity to a busy road).
- 20.19.3 With most of the emissions in the borough arising from road traffic emissions, reductions in emissions will be achieved by promoting modal shift to sustainable (and low emissions) forms of transport. One of the main methods of achieving modal shift is to promote development (including higher density development in some areas) in areas which are currently well served by public transport or will be well served in the future. **DM 06** (Building Heights) specifically addresses the clustering of tall buildings and notes that the only areas in the borough where this is likely to be appropriate.

- 20.19.4 **DM 15** (Specialist Housing), **DM 16** (Residential Conversions), **DM17** (Houses in Multiple Occupation), **DM 38** (Employment Led Regeneration) also promote development in locations served by public transport and walking and cycling and in doing so seek to reduce the need for travel by private motor vehicle. Collectively, this group of policies would be expected to have a positive effect in terms of reducing emissions to air from road traffic.
- 20.19.5 **DM 31** (Sustainable Transport) requires that developments with high trip generating characteristics be located in areas of high public transport accessibility and also that travel plans are produced in accordance with Transport for London thresholds. This policy also seeks that car parking is managed, and in some cases not provided at all, to reduce generated vehicular-based travel. DM 32 also makes allowance for car capped or car free development.
- 20.19.6 In **conclusion**, the proposed policies reflect a considerable focus on promoting sustainable transport, and hence would be expected to have a positive effect in terms of improving air quality. At this stage it is not possible to provide a further comment on the magnitude of this positive effect.

20.20 Noise

- 20.20.1 The Council supports the Mayor of London's noise strategy 'Sounder City – The Mayor's Ambient Noise Strategy' (March 2004) which focuses on reducing noise through better management of transport systems, town planning and the design of buildings. This also includes minimising the noise on roads and railways and the careful siting of noisy activities.
- 20.20.2 Currently there is no evidence to indicate that exposure to high levels of noise is a widespread issue for the borough (notwithstanding that some receptors may currently experience high levels of noise). With the general intent of the DM Policies DPD being towards facilitating growth in the borough (particularly to meet the London Plan's housing targets), land use intensification as well as mixed use development is likely to occur in a number of selected areas throughout the borough. If not managed properly, there is the potential that development could give rise to adverse noise effects.
- 20.20.3 **DM 23** (Environmental Protection) seeks to ensure that the noise effects of new development are assessed and adequately mitigated. Furthermore, the policy would also mean that, where a noise assessment is required, it would assess the potential effect of existing noise on proposed development. This is intended to address noise having an adverse effect on newly introduced receptors (for instance, if a new residential development was proposed close to an industrial park or a busy road).
- 20.20.4 It is also notable that the DM Policies DPD encourages the use of sustainable forms of transport, such as walking and cycling and public transport (particularly through **DM 02**, **DM 20**, and **DM 31**). In general terms it would be expected that these measures would contribute to a reduction in the number of journeys made by private car; and, given that road traffic is a major contributing factor to ambient noise levels, any measure to reduce the number of car trips would be expected to have a positive effect on reducing ambient noise levels. Benefits will be relatively minor, however.
- 20.20.5 In **conclusion**, a focus of the proposed policies is on promoting the use of sustainable forms of transport, which could lead to benefits in terms of noise. With regards to DM 23, although the policy is concise it is considered that it provides sufficient policy direction and regulatory control to ensure that potential noise effects are adequately considered and mitigated as part of the development control planning process. Given the growth aspirations in the borough, noise is likely to be a key issue (even where it is not particularly an issue at present).

20.21 Energy and carbon

- 20.21.1 A major challenge for the borough is to accommodate the proposed level of growth within the borough while at the same time reducing carbon emissions. These two objectives potential appear incompatible. However, between 2005 and 2011 the population of Haringey is estimated to have increased by 11% while the total annual CO₂ emissions reduced from 1,037kT to 870kT. This increase is due partly to local carbon reduction initiatives but does also reflect national trends, including year variations in average temperature, the economic downturn, falling real incomes and changes to the power generation fuel mix as we move from coal to gas and more renewable energy.¹¹ While the reasons for a reduction in the borough's CO₂ emissions between 2005 and 2011 may not be solely due to local initiatives, this does show that it is possible to effectively decouple development and carbon emissions.
- 20.21.2 **DM 01** (Delivering High Quality Design), **DM 02** (Accessible and Safe Environments), **DM 12** (Housing Design and Quality) and **DM 21** (Sustainable Design, Layout and Construction) set out design standards for development. The policies cover a wide range of design considerations, with DM 21 in particular having energy implications. This policy advocates design having regard to climate change adaptation and mitigation. It encourages retrofitting, natural ventilation, living roofs and green walls. As well as having drainage benefits, green walls and living roofs also improve the thermal performance of buildings reducing the need for mechanical heating and cooling.
- 20.21.3 Strategic Policy SP4 requires new developments to reduce energy use and carbon emissions during the design, construction and occupation phases. The policy seeks a step change in carbon emissions reduction in the borough so that all new residential development is zero carbon from 2016 onwards, and all new non-residential development from 2019 onwards. While Local Plan Strategic Policy SP4 should be followed, the DM Policies DPD does recognise that there may be specific circumstances where it is not possible for a proposed development to meet the required CO₂ reduction levels through on-site measures. **DM 21** (Sustainable Design, Layout and Construction) provides for carbon offsetting where on-site solutions are not practicable or viable, subject to national and regional policy. This includes off-site measures or financial contributions (via a section 106 agreement). It is considered that this policy would provide adequate flexibility for development proponents while not undermining the intent of Strategic Policy SP4.
- 20.21.4 **DM 22** (Decentralised Energy) promotes connections to decentralised energy (DE) networks for new development in line with the London Plan target for 25% of heat and power used in London to be generated through the use of localised DE systems by 2025. DE energy systems generate electricity locally which reduces transmission losses and lowers carbon emissions.
- 20.21.5 It is also notable that the DM Policies DPD encourages the use of sustainable forms of transport, such as walking and cycling and public transport (particularly through **DM 02**, **DM 20** and **DM 31**). In general terms it would be expected that these measures would contribute to a reduction in the number of journeys made by private car compared to how many trips would occur if high quality and convenient alternative transport options were not available. This would reduce CO₂ emissions from transport in the borough.
- 20.21.6 In **conclusion**, the DM Policies DPD will have a positive effect in terms of reducing per capita carbon emissions in the borough; however, it is not possible to determine whether this will result in continuing reductions in total CO₂ emissions from the borough to allow the borough to reach its target of a 40% carbon reduction in Haringey by 2020. While the DM Policies DPD will assist in meeting the overall emissions reductions targets for the borough, other measures will also be required, such as those set out in the Council's 'Third Annual Carbon Report 2013'.

¹¹ Haringey Council (2013) Third Annual Carbon Report 2013.

20.22 Waste management

- 20.22.1 Every year Haringey residents generate approximately 366kg of waste per person. Overall, residents produced 85,000 tonnes of waste each year. In 2006-2007, 22% of waste was recycled. The remaining residential and commercial waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which generates electricity. Around 75,000 homes currently receive a green box recycling service, enabling them to recycle a wide range of goods. In 2007-2008, Haringey exceeded their recycling and composting target with 25.68% of all waste sent to recycling and composting.
- 20.22.2 **DM 04** (Provision and Design of Waste Management Facilities) requires that new development makes provision for adequate waste storage and recycling facilities. It also requires the preparation of a waste management plan and encourages on-site composting for development with gardens. The policy has been updated since Regulation 18 stage to provide additional requirements for flatted development.
- 20.22.3 Other policies that could have implications for waste management include:
- DM 22 (Residential Conversions)
 - DM 23 (Houses in Multiple Occupation) in relation to providing adequate refuse storage facilities
 - DM 30 (New Waste Facilities) also seeks to ensure that new waste facilities support the principles of sustainable development and sets out that additional requirements will be set out in the North London Waste Plan.
- 20.22.4 In **conclusion**, the approach of the DM Policies DPD in terms of waste should have the effect of encouraging waste management and recycling for new development. Given the growth aspirations for the borough, this would be expected to contribute to a reduction in per capita terms of waste. The proposed DM policies on their own would not be expected to lead to significant reductions in waste volumes in the borough, either in per capita or net terms. Achieving more significant reductions is likely to require measures outside the scope of the DM Policies DPD. No effects are predicted in terms of delivery of waste facilities. This reflects the fact that Haringey Council is one of the seven north London councils developing the North London Waste Plan Development Plan Document.

20.23 Sustainable transport

- 20.23.1 Many parts of the borough already have relatively good levels of public transport accessibility and walking levels are slightly higher than the London average. The growth aspirations for the borough mean that demand for travel will inevitably increase. Planned integration of development with transport will be essential to ensuring that the increased demand for travel is met primarily using sustainable forms of transport. This will be achieved by giving travellers convenient access to sustainable transport options.
- 20.23.2 With large scale development planned within Haringey, the overall policy direction of the DM Policies DPD is to promote an integrated approach to land use and transport planning that minimises the need to travel and encourages sustainable travel choices. This can mean focusing land use intensification around transport interchanges (e.g. the siting of tall buildings as set out in **DM 06**). Policies are included that promote the consideration of accessibility by public transport, cycling and walking when considering the location of proposed development such as for specialist housing (**DM 15**) and community facilities (**DM 49**).

- 20.23.3 **DM 31** (Sustainable Transport) requires that developments with high trip generating characteristics be located in areas of high public transport accessibility and also that travel plans are produced in accordance with Transport for London thresholds. This policy (along with **DM 32**) also seeks that car parking is managed, and in some cases not provided at all, to reduce the demand for travel by private cars. **DM 32** (Parking) also promotes the use of car club schemes as a means of reducing car use, as well as making allowance for car capped or car free development.
- 20.23.4 **DM 38** (Employment Led Regeneration) promotes proposals for mixed-use redevelopment on sites within designated Local Employment Area: Regeneration Areas where this is necessary to facilitate employment led renewal and regeneration. This policy also requires that potential regeneration sites have high levels of public transport accessibility. This policy does also allow for some non-employment uses provided it would not result in an overall net loss of employment floorspace. The enabling of mixed-use development in certain circumstance would have a positive effect in terms of sustainable transport by reducing the need to travel by having a range of land uses in proximity to each other. There is a risk that housing built as part of such mixed-use redevelopment could have poor access to key services such as health care and education and to sustainable transport.
- 20.23.5 Other policies that could have implications for sustainable transport include:
- DM 02 (Accessible and Safe Environments)
 - DM 20 (Open Space and Green Grid) provides for improvement of pedestrian and cycle linkages within and between sites within the Green Grid which would be expected to have sustainable transport benefits
 - DM 433 (Crossovers and Vehicular Accesses)
 - DM 35 (Cycle storage in front gardens)
 - DM 49 (Managing the Provision and Quality of Community Infrastructure) in terms of managing potential effects on road safety or traffic generation.
- 20.23.6 **In conclusion**, the proposed policies will have a **significant positive effect** on encouraging the use of sustainable forms of transport. Ensuring that walking and cycling are actively encouraged as part of new development will be a matter for site specific policy and detailed planning applications, but the borough-wide DM Policies DPD policies will focus growth towards areas with existing or future high levels of public transport accessibility.

20.24 Overall conclusions

- 20.24.1 The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with significant positive effects identified as likely in terms of: education, health, housing, community cohesion, economic growth, town centres, biodiversity, townscape and cultural heritage, open space and sustainable transport. There is, however, often a degree of uncertainty around predicted positive effects given the important role that will be played by site allocation policy (which in turn will be influenced by the emerging update to the Infrastructure Delivery Plan, IDP).
- 20.24.2 No significant negative effects are predicted, although risks associated with some policy approaches. In particular, policy approaches that will drive a considerable shift in the nature of employment land in Haringey potentially have implications for economic inclusion, although it is recognised that the Plan is set in the context of delivering the Borough's strategic employment target. Objectives around 'energy and carbon' and 'open space' are notable in that there is the theoretical potential to do more (in order to meet carbon reduction standards; and reduce open space deficiencies), but it is recognised that in practice there is no potential to set more stringent policy without compromising other objectives, which are a priority locally (i.e. objectives around housing, regeneration and employment growth), and ensuring consistency with national and regional policy.
- 20.24.3 There were a limited number of recommendations made in the Interim SA Report (2015), where the appraisal highlighted a small number of instances where the plan might potentially reword or elaborate on policy wording for particular sustainability issues, and this report has noted where amendments to the Plan were subsequently made. No specific recommendations remain outstanding.

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

21 INTRODUCTION (TO PART 3)

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

22 PLAN FINALISATION

- 22.1.1 Subsequent to publication of the Pre-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).
- 22.1.2 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'*.

23 MONITORING

- 23.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. In-light of appraisal findings (i.e. predicted effects and uncertainties) presented in Part 2 above, monitoring efforts might focus on:
- Building heights in the vicinity of heritage assets;
 - The way in which schemes seek to contribute to / make use of decentralised energy
 - Green roofs / living walls and other sustainable design measures implemented;
 - The mix of affordable housing;
 - Use of green spaces and the Lee Valley Regional Park.

APPENDIX I – REGULATORY REQUIREMENTS (1)

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

Schedule 2

Interpretation of Schedule 2

The report must include...

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the SA Report]
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	The likely significant effects associated with alternatives, including on issues such as...	
(c) the environmental characteristics of areas likely to be significantly affected;	... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i> [Part 2 of the SA Report]
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(i) a description of the measures envisaged concerning monitoring.	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
	Environmental characteristics of areas likely to be significantly affected	
	Key environmental problems / issues and objectives that should be a particular focus of appraisal	

APPENDIX II – REGULATORY REQUIREMENTS (2)

Appendix I signposts to broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met.

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 5 ('What's the scope of the SA'). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix III. With regards to explaining 'how... considerations have been taken into account' - • Chapters 5 explains how/why understanding of the issues that should be a focus of alternatives appraisal was refined subsequent to consultation/SA in Feb 2015. • Chapters 6-18 explain, for each of the issues that is a focus of alternatives appraisal at the current time, how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015. • Chapters 6-18 also explain the Council's 'reasons for selecting/developing the preferred approach', i.e. explain how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. • Chapter 20 ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in Feb 2015.

f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	- Chapter 6-18 present alternatives appraisal findings (in relation to each of the plan issues that reasonable need to be a focus of alternatives appraisal at the current time). - Chapter 20 ('Appraisal of the draft plan') presents the appraisal of the draft plan. As explained within the various methodology sections, as part of appraisal work consideration has been given to the established SA scope, and the need to consider the potential to various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The Feb 2015 'appraisal of the draft plan' (Chapter 23 within the Interim SA Report) made a number of recommendations, and subsequently these were taken on-board by the Council when finalising the plan for publication/submission. At the current time, Chapter 20 ('Appraisal of the draft plan') concludes by highlighting a number of ways in which the plan might 'go further' in order to more fully address specific sustainability considerations; however, no explicit recommendations are outstanding.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	As discussed, Chapters 5-18 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapters 6-8 explain the Council's 'reasons for selecting/developing the preferred approach' in-light of alternatives appraisal. Methodology/limitations are discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 23 presents 'measures envisaged concerning monitoring'.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	An Interim SA Report, which essentially presented all the information required of the SA Report, was published alongside the draft plan in February 2015, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the pre-submission plan, under Regulation 19, so that representations might be made ahead of submission.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Report (Feb 2015), alongside consultation responses received, when finalising the plan for publication/submission. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when considering the plan at Examination (i.e. taken into account by the Inspector).

APPENDIX III – CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of sustainability objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal work under the SA framework.

What's the sustainability context?

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.

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.

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 2008¹². 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.

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.

What's the sustainability baseline?

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.
- There is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation.
- Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery
- There is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence

¹² 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.

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 not particularly high, but there are localised issues. In Tottenham Hale 22.45% of residents aged 16 and over have 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.
- Although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment.
- As a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers. This issue has a greater impact on children from Black and other ethnic minority groups and children who are eligible for free school meals. Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small.
- Post-16 attainment in Haringey is improving but opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education.

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.
- Health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children.
- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).
- There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas.
- The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years to ensure essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives.
- Environmental issues are more concentrated in certain parts of the borough. For example, town centres are a particular focus for highway congestion and poor air quality. Some issues also impact more heavily in more deprived parts of the borough, with higher accident casualty rates in the East of the borough.

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.
- Housing need is high amongst certain groups of residents including those with the protected characteristics. For example, levels of homelessness are high amongst female lone parents.
- Homelessness is also high in the age group 16-24 and 25-44 compared to the expected profile from census data.
- Homelessness data indicates Black households approach as homeless at a level which is more than twice their representation in Haringey's population.
- Some protected groups also have high levels of housing need due to higher levels of vulnerability. Homeless acceptance due to mental or physical disability is higher than would be expected given the profile of disability in the 2011 census, indicating that disability may be a factor in causing homelessness for these groups of households.
- The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services.

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.
- Compared to London, Haringey has a similar proportion of 0-19 year olds, a higher working age population and a lower proportion of older people. Those aged 25-29 and 30-34 form the two largest groups in the borough.
- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and around 200 languages are spoken. Our population is the fifth most ethnically diverse in the country.

- Historically, Haringey has experienced a high level of population turnover. Most population turnover occurs by people moving into and out of other parts of the UK.

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.
- Improved access to services and facilities is key to ensuring equality of opportunity. Certain groups may suffer particularly from reduced activity, for example those less able to travel due to mobility issues or low income.
- Analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough. For example, the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area.
- Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands

Economic growth

- When 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.
- 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 roles¹³ (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.
- Labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities.

¹³ 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.

- There is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park. Unemployment and the proportion of young people who are NEET (Not in education employment or training) is higher in the east of the borough.

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
- 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.

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 (some of which have had Character Appraisals¹⁴ completed), two Registered Parks and Gardens (Finsbury Park and Alexandra Park), 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. Also, 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.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.

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. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land, and 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.

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

- 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.
- Open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough.

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 Moselle Brook and Stonebridge Brook is heavily modified. These Brooks are both tributaries of the Lower Lee River, classified as having '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 GLA¹⁵ estimate that buildings cover 24,000 hectares or 16% 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 have 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 level¹⁶ 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.

¹⁵ 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)

¹⁶ 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)

- 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. 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.
- 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.

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

As explained within Chapter 4 (What's the scope of the SA?), the SA process undertaken for the Haringey Local Plan has sought to integrate EqIA and HIA. Relevant issues have been considered through scoping work (i.e. through context and baseline review - see Appendix III; and establishment of the SA framework - see Chapter 4) and have fed into the appraisal of alternatives (see 'Part 1') and the appraisal of the draft plan (see 'Part 2'). The aim of this appendix is to summarise and 'signpost'.

- Community cohesion is an important broad issue, recognising that: almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with around 200 languages are spoken; and historically, Haringey has experienced a high level of population turnover. The proposed approach to addressing community infrastructure through the DM Policies DPD seeks to increase quantity, quality and accessibility in relation to community infrastructure, enhancing existing infrastructure and delivering new infrastructure where necessary; however, there is also much reliance placed on the Infrastructure Delivery Plan. More generally, strong relationships between people from different backgrounds and communities are encouraged through efforts to ensure inclusive environments and through the promotion of a mix of tenure housing.
- Health is an important broad issue, recognising that: health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years); there is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. The DM Policies DPD is set to improve health and wellbeing through increasing access to and quality of open space; restricting the locations in which hot food takeaways and betting shops can operate; and encouraging active travel and sustainable transport. These benefits will likely be felt in parts of the borough where existing issues are greatest.
- Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals); Children from Gypsy Roma and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small; and whilst post-16 attainment in Haringey is improving, opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. However, the DM Policies DPD has relatively little effect in this regard, as discussed under the 'education' heading within the appraisal of the draft plan ('Part 2' above).
- Crime is an important broad issue, recognising that: there is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation; young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery; and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence. As discussed under the 'crime' heading, as part of the appraisal of the draft plan ('Part 2' above), DM policy is set to ensure that opportunities to design-out crime are realised, and policy also supports adaptive re-use and developing vacant and derelict buildings (including historic buildings).
- Housing is an important broad issue, recognising that: housing need is high amongst certain groups of residents including those with the protected characteristics, e.g. levels of homelessness are high amongst female lone parents; black households approach as homeless at a level which is more than twice their representation in Haringey's population; some protected groups also have high levels of

housing need due to higher levels of vulnerability, with homeless acceptance due to mental or physical disability higher than would be expected given the profile of disability in the 2011 census. The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services, and the DM policies DPD will act to maintain a mixture of housing, allowing for renewal and refurbishment of the existing dwelling stock where necessary.

- Economic inclusion is an important broad issue, recognising that: labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics, e.g. the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities; and there is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. This is an important issue set to be addressed through all four plans, including the DM Policies DPD, recognising the support for redevelopment of some existing employment areas. Employment density will be increased in the vast majority of cases, and will be significantly increased overall (i.e. across the borough); however, the nature of jobs available within the borough is set to shift, and there is a risk of disproportionate effects. It is noted that there is some focus on skills and training, including support for apprenticeships and work experience.
- Environmental quality is an important broad issue, recognising that: the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with the protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality); environmental issues are more concentrated in certain parts of the borough, e.g. town centres are a particular focus for highway congestion and poor air quality, and there being higher accident casualty rates in the relatively deprived east of the borough; and open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough. DM 23 (Environmental Protection) should help to ensure an improvement in the baseline over time, but more notable effects will result from redevelopment and regeneration within areas where environmental quality is currently poor.
- Accessibility is an important broad issue, recognising that: improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income); analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough, e.g. the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area. Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands, however, this is only set to be addressed through the plans at the current time to a limited extent, as work on the Infrastructure Delivery Plan (IDP) is still on-going, and it is through this plan that provision will primarily be made. Having said this, the DM DPD does perform well, as discussed under the 'accessibility' heading above (and other headings), given the considerable focus on enhancements to movement / permeability, and support for locating high trip generating developments where PTAL is best. Notably, there is also a policy focused on Accessible and Safe Environments (DM 02).

APPENDIX V – HOUSING CONVERSIONS

Introduction

Chapter 6 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for 'housing conversions':

Option 1 - Restricted conversion area to preserve larger and family homes

Option 2 - Do not introduce restricted conversion areas.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

For each of the options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework.

Red shading is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Effects are predicted taking into account the criteria presented within Regulations.¹⁷ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity).

Finally, it is important to emphasise that the approach taken strikes a balance between the desire to ensure rigorous and systematic analysis on the one hand, and ensure **conciseness / accessibility** on the other. Where an issue, or an effect characteristic, is not referenced, the implication is that there is no point to be made that warrants a mention, given the desire to be concise. That is not to say that the issue/characteristic has been entirely overlooked as part of appraisal. Similarly, the 'significance' of effects is only discussed in instances where a clear conclusion can be reached (or there is some uncertainty). In instances where significant effects are not predicted, then significance is not discussed.

¹⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	The preservation of larger and family homes will help preserve more homes for families that will have their own gardens. This should encourage children, along with adults, to spend more time outside which in the long term leads to many health benefits. On the other hand if a lack of smaller, more affordable homes means people are forced to live in sub-standard accommodation or commute long distances, this could have negative health impacts. On balance, the alternatives cannot be differentiated with any certainty.	=	
Housing	The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing in terms of smaller and larger homes; but if allowed to continue unrestrained can lead to a loss of housing mix as larger homes are lost to conversions. The cumulative effect of conversions can have an adverse impact on the character of the existing residential area in terms of the intensification of use, increased parking and introduction of communal bin stores. Without setting a restricted conversion area, it can lead to the loss of smaller family homes, for which there is an anticipated need. Notwithstanding issues related to the standard of accommodation provided following conversions and the impact on the intensification of the amenity of adjacent occupiers. Residential conversions, particularly of smaller properties require management to ensure that an appropriate balance is struck between the contribution conversions make to local housing supply, the demand for family homes with three bedrooms or more and the impact on the character of the local area. The Borough's population is set to increase by 31,234 over the period 2011-2021 indicating higher density housing is needed.	★1	2
Community Cohesion	If it is assumed that the restricted conversion area policy would only be applied to areas with a mix of housing where larger and family housing is under significant pressure for conversion, then Option 1 would be the preferred option as it would help to protect and maintain a variety of housing types in areas where there is pressure to sub-divide the remaining family homes. This should support a more mixed community and encourage the development of relationships between from different backgrounds and communities.	★1	2
Accessibility	No notable implications.		
Economic Growth	Assuming that there are significant pressures for the conversion of family homes in a number of areas, the failure to set a restricted conversion area is likely to result in greater adverse effects on the availability of family homes, compared to not setting a restricted area. This could affect the type of people that move into the area and thus the type of labour available for the Borough's employment sector. On the other hand, a greater availability of small homes might enable more people to afford to live in the borough and thus have a positive impact on the amount of labour available locally. On balance, the alternatives cannot be differentiated with any certainty.	=	
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	Enabling building conversions to create more dwellings and higher density living helps use land effectively and efficiently. Therefore allowing conversion to happen all over the borough would allow for higher density housing and more effective use of land.	2	★1
Flood Risk and Climate Change	While there is the potential that per capita emissions could reduce as a result of the more efficient use of space through provision of smaller dwellings within the footprint of an existing dwelling there is no evidence to ascertain this at this stage.	=	
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	The conversion of larger houses, that are often not modern, could increase the efficiency of the use of space and enhance energy efficiency (given building regulations requirements for energy efficiency). Therefore not restricting conversion to a particular area could facilitate the energy efficient conversion and retrofitting of more homes, reducing per capita energy consumption and carbon emissions.	2	★1
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
Summary A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.			

APPENDIX VI – HOUSING DENSITY AND DESIGN

Introduction

Chapter 7 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for housing density and design:

Option 1- Apply London Plan density standards, but allow flexibility in applying these standards, based on local circumstances, to optimise housing delivery

Option 2 - London Plan standards applied with no flexibility for consideration of local or site circumstances.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Historically, high density housing was designed in such a way that it inadvertently facilitated antisocial behaviour, crime and the fear of crime. However if the high density housing is designed effectively (for example through 'Secured By Design' principles) and provides a mix of housing this fear and level of crime should be reduced. On balance, the alternatives cannot be differentiated with any certainty.	=	
Education	The only concern with education would be to make sure that in creating higher density housing, it would be possible to provide enough additional educational capacity to support it. However, it is assumed that this would be secured through s106 or CIL contributions. On balance, the alternatives cannot be differentiated with any certainty.	=	
Health	A concern would be creating enough open space and health facilities, such as GP practices, for the residents of these high density developments. This relates to the quality of design and to the ability of the council to secure funding for supporting health, open space and community infrastructure through s106 or CIL contributions. It is assumed that the council is able to effectively address these issues through implementation. On balance, the alternatives cannot be differentiated with any certainty.	=	
Housing	The NPPF and London Plan require authorities to meet their assessed need for market and affordable housing. In some cases this might only be achieved through building higher density buildings to accommodate housing. The NPPF also states that larger developments are sometimes the best means of achieving new homes. With Haringey being a tightly built up borough, available land is restricted. However more homes could be provided on the same land area where higher densities are allowed. Allowing higher densities in some circumstances will help increase the amount of housing provided in the area, including affordable housing.	★1	2
Community Cohesion	Higher density housing has the opportunity to create a strong sense of cultural identity, belonging and well-being and develop opportunities for community involvement. High quality design and the creation of mix of housing types will be critical to achieving this.	★1	2
Accessibility	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Economic Growth	The borough has a great housing need, and if left unchecked could lead to the reduction of land available for businesses and reduce economic growth. The promotion of higher density housing can leave more land for business development and enable people looking to live and work in the borough to find homes, increasing the local labour supply.	★1	2
Skills and Training	No notable implications.		
Economic Inclusion	Higher density housing can leave more land for business development and enable people looking to live and work in the borough to find homes, increasing the local labour supply and accessibility to local jobs.	★1	2
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	Building at higher densities promotes the efficient and effective use of land because it uses less land to provide more housing for the local residents.	★1	2
Flood Risk and Climate Change	Density can have implications for surface water run-off, but high quality design including green roofs and sustainable drainage measures should be used to minimise surface water runoff. On balance, the alternatives cannot be differentiated with any certainty.	=	
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	Higher density housing can mean less energy is needed to heat individual dwellings with some heat being distributed across nearby dwellings. This means that new housing, along with modern designs, can be more energy efficient.	★1	2
Waste Management	No notable implications.		
Sustainable Transport	Higher density development could facilitate the development of enhanced sustainable transport solutions that require a critical mass to support them. This would bring benefits for local residents and promote reduced car use.	★1	2
Summary Haringey is a densely populated borough (86.2 persons per hectare; well above the London average of 52) and the population is set to increase by 31,234 over the period of 2011 to 2021. This indicates that some high density housing schemes are needed, perhaps going beyond what is recommended in the London Plan. Against this background, Option 1 is seen to perform well in terms of sustainability objectives. As well as benefits in terms housing objectives, targeted high density development in Haringey is supported in terms of 'sustainable transport', 'reducing per capita carbon emissions' and 'increasing accessibility to local jobs'. However, there are risks around access to health care and community infrastructure more generally. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.			

APPENDIX VII – EMPLOYMENT SITES (1)

Introduction

Chapter 8 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for employment sites:

Option 1 - Requirement to maximise employment densities on sites

Option 2 - Less restrictive approach, with no specific steer for higher employment densities

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Not maximising employment densities could lead to continued high unemployment levels, with Tottenham having some of the highest levels of unemployment in London and the UK. High unemployment areas can often lead to higher crime rates and antisocial behaviour. However, on the other hand maximising employment densities can have implications for the type of employment that is supported. On balance, the alternatives cannot be differentiated with any certainty.	=	
Education	No notable implications.		
Health	No notable implications.		
Housing	No notable implications.		
Community Cohesion	The points discussed above under the 'crime' heading are relevant here. There could be implications; however, on balance, the alternatives cannot be differentiated with any certainty.	=	
Accessibility	No notable implications.		
Economic Growth	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. 22% of businesses in Haringey cite the size of their current premises as a 'major problem'. This could indicate the need of newer, more appropriate office space for the businesses that dominate the area, mainly falling into B1 use. Overall economic growth is more likely to occur from B1 and B2 uses as these have not declined over recent years while other uses have, therefore showing where investment would be most beneficial for the economy of the local area. By maximising employment densities (Option 1) there would be an increase in the number of jobs within the same amount of floorspace, and as such could lead to higher rates of employment than under Option 2. This is likely to lead to a significant positive effect. Option 2 would operate a more flexible approach to employment which could potentially better-respond to market dynamics, however is likely to result in fewer jobs than Option 1.	1	2
Skills and Training	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	The encouragement of new businesses is more likely to occur from Option 1 because, as noted above, economic growth is considered most likely to come from B1 development in the borough. Also a focus on B1, with higher employment densities, is likely to lead to a higher number of new jobs created which is likely to have a preferential effect in terms of economic inclusion. Option 1 is therefore likely to lead to a significant positive effect in terms of this objective.		2
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	Higher density employment results in more effective and efficient use of land with more jobs being provided from less space.		2
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	B1 uses are less likely to cause noise disturbance compared to B2 and B8 uses.		2
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
Summary In an area that is constrained in terms of the availability of land for employment development and has high unemployment levels, intensifying the existing offer is an important priority to create more jobs for the growing population and to address historic local unemployment. Against this background, Option 1 is seen to perform well in terms of sustainability objectives, with significant positive effects predicted in terms of economic growth and economic inclusion. A risk is that if/when space for large floorspace uses is needed, there will not be the land available to accommodate these uses, but this is a more minor consideration given the evidence suggesting economic growth locally is considered most likely to come from B1 development.			

APPENDIX VIII – EMPLOYMENT SITES (2)

Introduction

Chapter 9 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for employment sites:

- Option 1 -** Allow introduction of non-employment uses (as part of mixed use schemes) in certain designated employment locations, to cross-subsidise and enable new employment development to come forward
- Option 2 -** Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Mixed use schemes (Option 1) ensure that sites are busy throughout the day, therefore reducing risk of crime / fear of crime.		2
Education	No notable implications.		
Health	No notable implications.		
Housing	A requirement to cross-subsidise employment development could make redevelopment less of an attractive option, meaning that it is less likely that housing would come forward. However, in practice it is not thought that this will be the case in Haringey. There is also an argument to suggest that, under Option 2 (no cross subsidy) it could be the case that existing employment sites are developed more intensively for residential uses, which might not be ideal from a 'housing' perspective if the buildings and locations are not ideal (e.g. because of layout, design or access to services/facilities).	=	
Community Cohesion	Under Option 1 the design of any new mixed use development in an employment area would have to be carefully considered to ensure that a genuine and cohesive 'community' was created.	=	
Accessibility	No notable implications.		
Economic Growth	Cross subsidy (Option 1) is a means of ensuring that sites that already perform an employment function continue to do so, and it is likely that the nature of employment development that comes forward through cross-subsidy will be of a type (e.g. knowledge or creative industries) that is needed from an economic growth perspective. Significant positive effects are likely.		2
Skills and Training	No notable implications.		
Economic Inclusion	Creating mixed use development promotes flexible working patterns and good physical accessibility to local jobs in the employment location and may help to cross subsidise employment uses that create jobs and		2

Topic	Discussion	Opt 1	Opt 2
	opportunities for new businesses to establish. Regeneration of employment areas could have negative impacts on existing businesses if increases in average rents or changes in floorspace provision force them to relocate. However this should be mitigated by the requirement in Policy DM 48 for a proportion of the provided employment floorspace to be affordable workspace in perpetuity.		
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site is likely to mean that the employment use is office based, leading to fewer problems around noise and disturbance.		=
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
<u>Summary</u> Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.			

APPENDIX IX – TOWN CENTRE USES

Introduction

Chapter 10 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for town centre uses:

Option 1 - Set thresholds for percentage of A1 uses in primary and secondary frontages

Option 2 - No thresholds or different (higher/lower) thresholds for A1 uses

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	There is an issue in that a lack of active frontages can lead to increased fear of crime; however, it is not entirely clear which option would most likely lead to positive effects / would lead to greater positive effects.	=	
Education	No notable implications.		
Health	No notable implications.		
Housing	No notable implications.		
Community Cohesion	Protecting retail in town centres could help to sustain strong centres for the community, which helps to generate a greater sense of cultural identity and belonging. Conversely, setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the community benefits provided by town centres. On balance, the alternatives cannot be differentiated with any certainty.	=	
Accessibility	No notable implications.		
Economic Growth	Protecting A1 uses in town centres could help to sustain a vibrant local economy and local jobs. Conversely, setting thresholds for A1 could constrain the vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the economic growth of town centres. On balance, the alternatives cannot be differentiated with any certainty.	=	
Skills and Training	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	Protecting A1 uses in town centres could help to sustain a vibrant local economy and local jobs. Conversely, setting thresholds for A1 could constrain the vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the economic growth of town centres. A more permissive approach (Option 2) might create more opportunities for new local businesses to develop. On balance, the alternatives cannot be differentiated with any certainty.	=	
Town Centres	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. Crouch End and Green lanes have the highest percentages of vacant town centre floor space, with 8.7% and 6.9% respectively. In one sense, Option 1 could improve this situation by giving priority for space in the town centres to be used for retail uses. However in the other sense, Option 1 could exacerbate the problem if retail cannot afford to set up in these town centres. Protecting retail in town centres could help to sustain strong and vital centres for the community. Conversely, setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the vitality of town centres. On balance, the alternatives cannot be differentiated with any certainty.	=	
Biodiversity; Townscape and Cultural Heritage; Open Space; Water Resources; Soil and Land Quality; Flood Risk and Climate Change; Air Quality; Noise; Energy and Carbon; Waste Management; and Sustainable Transport: No notable implications.			
<u>Summary</u> The town centres in Haringey act as the focus for local convenience shopping and community facilities. Given this role, they will contribute to the vitality local communities, and also help to reduce car dependency. Protecting retail in town centres (Option 1) could help to sustain strong and vital centres in the long term; but on the other hand there are arguments to suggest that setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2). If there is greater demand for non-A1 uses than some existing A-class uses, then a restrictive policy would act to constrain the vitality of town centres, with knock-on effects. It is difficult to distinguish between the alternatives, given the changing role of town centres in society. However, it is noted that Haringey has commissioned an evidence base study which in essence says that, given the increasing population in Haringey and the likely increase in disposable income, it is likely that more retailing will be needed in the borough. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.			

APPENDIX X – NEGATIVE CLUSTERS: HOT FOOD TAKEAWAYS / BETTING SHOPS

Introduction

Chapter 11 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for negative clusters:

Option 1 - Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)

Option 2 - No policy - applications assessed against other town centre use policies.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Negative clusters are more likely to attract crime and have an increased fear of crime associated with them. Restricting these negative clusters would help reduce the levels of crime and antisocial behaviour in the long term.	★1	2
Education	No notable implications.		
Health	Hot Food / Fast Food Takeaways are often bad for people's health, and there is clear evidence that regular use consumption of fatty food can lead to poor health (e.g. cardiovascular disease, obesity). Therefore promoting the restriction of negative clusters can help reduce the amount of fast food takeaways and in the longer term can significantly contribute to healthier lifestyles of residents. Given the prevalence of obesity in Haringey, this would likely lead to a significant positive effect in terms of health.	★1	2
Housing	No notable implications.		
Community Cohesion	Negative clusters of hot food takeaways and betting shops can often take the identity out of a community and detract from people visiting the area due to their impact on the character of an area. Option 1 would help promote a sense of cultural identity, belonging and well-being more than Option 2.	★1	2
Accessibility	It might be suggested that negative clusters impact on town centre vibrancy, and hence the potential for town centres to function as centres of service provision. However, there is no clarity on this matter.	=	
Economic Growth	There is the possibility that if negative clusters were restricted there would be a struggle to find alternative uses for the buildings. However if they were restricted this would create opportunities to diversify employment opportunities for the local area.	=	
Skills and Training	No notable implications.		
Economic Inclusion	The restriction of negative clusters could give the opportunity for the encouragement of new businesses to the area which would diversify the employment in the area and give more opportunities for the local community.	★1	2

Topic	Discussion	Opt 1	Opt 2
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. All of this indicates that promoting town centres that are diverse and beneficial for the community through the economy and society are more advantageous. This is achievable through buildings being used for positive uses, compared to the town centres being a hub for negative clusters. As a result Option 1 is more beneficial for town centres.	★1	2
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	Negative clusters of hot food takeaways and betting shops can often adversely affect the character of an area and the townscape. Option 1 would control clusters of such uses and help to prevent negative effects, providing greater policy protection than Option 2.	★1	2
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
Summary Overall, in terms of sustainability objectives, Option 1 is clearly best performing. No draw-backs are highlighted by the appraisal. Restricting negative clusters of hot food takeaways and betting shops would likely lead to significant positive benefits in terms of 'health', given the assumption that there would be reduced consumption of fatty foods. There would also be benefits in terms of reduced crime and antisocial behaviour, improved townscape and improved vitality in town centres.			

APPENDIX XI – TALL BUILDINGS.

Introduction

Chapter 12 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for tall buildings:

- Option 1 -** Detailed policy for the siting and design of tall buildings, within identified locations, taking account of site specific circumstances and supported by Haringey's Urban Characterisation study.
- Option 2 -** Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	No notable implications.		
Housing	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. The difference between the alternatives is that Option 1 would limit tall building development to specific locations, whereas Option 2 can be seen to be a more relaxed approach. Option 2 could therefore be considered the preferred option in terms of delivery of a greater amount of housing.	2	1
Community Cohesion	No notable implications.		
Accessibility	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. Ensuring accessible local services in various buildings will lead to a better environment for all Communities. However Siting and Design of Tall Buildings is not likely to have any significant effect in terms of Accessibility. On balance, the alternatives cannot be differentiated with any certainty.	=	
Economic Growth	The development of tall buildings could create additional space for business development and new employment opportunities. However indiscriminate development of tall buildings could put pressure on infrastructure including transport infrastructure, potentially undermining growth prospects. On balance, the alternatives cannot be differentiated with any certainty.	=	
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Town Centres	Not having a Prescriptive Tall buildings Siting and Design constraint will allow more wide ranging development which in turn could give a much needed lift to areas in decline. However there is a need for town centres to retain local distinctiveness and community value. It is important to ensure that a balance would be able to be struck so as to ensure the scale of new retail, commercial, culture and leisure developments within town centres reflect the size, role and function of the centres.	★1	2
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	The Strategically Important Landmark Viewing Corridor contributes to the overall feel of the area. Any Tall building in this respect would impede on the “London Panorama.” Proposed developments should fit within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. In this case applying constraints, including complying with CABE/English heritage guidance, would be the better option as it would have a more-beneficial preferential effect on protecting the borough’s townscape and cultural heritage.	★1	2
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	Tall buildings represent an efficient use of land; however, it is not possible to meaningfully differentiate between the alternatives.	=	
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	Siting and Design of Tall Buildings is not likely to have any significant effect in terms of Energy and Carbon. It is noted that tall buildings can have very high embodied energy/carbon and that the use of lifts to access floors can increase energy consumption; however tall buildings can be designed to be very energy efficient in operation (e.g. due to high densities involved).	=	
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
<u>Summary</u> Option 1 is best performing in terms of all objectives, other than those relating to ‘housing’. Option 1 would restrict tall buildings to particular areas, protecting the borough’s townscape and cultural heritage, while still allowing tall buildings in some areas. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.			

APPENDIX XII – VIEWS AND VISTAS

Introduction

Chapter 13 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for views and vistas:

Option 1 - Policy to minimise disturbance of identified local views and vistas

Option 2 - Only protect London Plan strategic views.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	No notable implications.		
Housing	The protection of identified local views in addition to Local Plan strategic views could limit the options for housing development on some sites, therefore in terms of housing delivery Option 2 (protect London Plan strategic views only) would be the preferred approach as it constrains fewer sites.	2	1
Community Cohesion	No notable implications.		
Accessibility	No notable implications.		
Economic Growth	No notable implications.		
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	View and vistas contribute to legibility and wayfinding within town centres.	1	2
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	Protection of identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough's townscape and cultural heritage resources, as compared to only protecting London Plan strategic views. Therefore Option 1 is preferred as it will have the greater positive impact on this objective. Option 1 goes over and above the London Plan requirements and therefore would lead to a significant positive effect in terms of this objective.	1	2
Open Space	No notable implications.		
Water	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Resources			
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
<u>Summary</u> A policy to minimise disturbance to identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough's townscape and cultural heritage resources, as compared to only protecting London Plan strategic views (Option 2). Significant positive effects are predicted in terms of townscape/heritage objectives. However, greater protection of identified local views in addition to Local Plan strategic views could place constraints on housing delivery in some areas.			

APPENDIX XIII – HERITAGE AND CONSERVATION.

Introduction

Chapter 14 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for heritage and conservation:

Option 1 - Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use

Option 2 - Do not apply policy to non-designated heritage assets.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	It is not possible to differentiate between the alternatives, although it is noted that the preservation of heritage assets can help to create a sense of place and thus improve people's sense of wellbeing.	=	
Housing	The protection of non-designated heritage assets (Option 1) could place greater restrictions on the development of some sites, including housing developments. However this effect is anticipated to be limited.	2	1
Community Cohesion	No notable implications.		
Accessibility	No notable implications.		
Economic Growth	The protection of non-designated heritage assets (Option 1) could place greater restrictions on the development of some sites, including sites that could contribute to economic growth. However this effect is anticipated to be limited.	2	1
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	Option 1 would seek to protect both designated and non-designated heritage assets. Designated assets appear sufficiently protected through national policy, though some buildings are at risk, but the policy would increase protection of non-designated assets, thereby helping to preserve and enhance the value that they contribute to Haringey. Expanding the policy focus to include non-designated assets (Option 1) is likely to result in significant positive effects in terms of townscape and cultural heritage, compared to Option 2 which retains a focus solely on designated assets.	1	2

Topic	Discussion	Opt 1	Opt 2
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
<u>Summary</u> A policy focus on non-designated assets in addition to designated assets (Option 1) is likely to result in significant positive effects in terms townscape and cultural heritage objectives, and it is not clear that there are any major draw-backs to this approach. There might be some negative implications for housing and economic growth, but (thinking long-term) heritage assets can help enable regeneration and create a sense of place (with positive implications for economy and community objectives).			

APPENDIX XIV – CAR FREE OR CAR CAPPED DEVELOPMENTS

Introduction

Chapter 15 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for ‘car free or car capped developments’:

Option 1 - Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned

Option 2 - Parking required, in accordance with the London Plan parking standards.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	Creating residential developments with limited or no on-site parking could increase the usage of forms of sustainable transport, including active travel modes such as walking and cycling. This should improve health outcomes over the medium to long term through increased physical activity.	1	2
Housing	No notable implications.		
Community Cohesion	No notable implications.		
Accessibility	Limiting parking could reduce accessibility to services and amenities, however if it is assumed that Option 1 would only be applied to sites with high PTAL levels then this should not occur, therefore it is considered that Car Free or Car Capped Developments is not likely to have any significant effect in terms of accessibility.	=	
Economic Growth	No notable implications.		
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Quality			
Flood Risk and Climate Change	No notable implications.		
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 concerns that ongoing development might significantly increase emissions. Minimising per capita emissions from transport by encouraging use of more sustainable transport modes would improve air quality in an area.	★ 1	2
Noise	No notable implications.		
Energy and Carbon	If, under Option 1, the policy is robustly applied in the planning process (and assuming that there are significant opportunities to reduce car use) then it could result in a positive effect in terms of reducing transport-related energy consumption and per capita greenhouse gas emissions.	★ 1	2
Waste Management	No notable implications.		
Sustainable Transport	Car Capped developments (Option 1) would encourage use of 'sustainable' forms of transport (walking, cycling and public transport) instead of the car. The reason for taking this approach primarily relates to infrastructure capacity (as there are concerns that the cumulative effect of numerous developments might overwhelm road capacity, which is already set to be stretched).	★ 1	2
Summary Option 1 (limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone in place or planned) is likely to have greater positive effects in terms of encouraging sustainable transport (significant positive effect), health, air quality and climate change mitigation objectives. With large scale development planned within Haringey, an integrated approach to land use and transport planning that minimises the need to travel and encourages the most sustainable travel choices could have a notable positive effect on reducing transport-related greenhouse gas emissions per capita.			

APPENDIX XV – CARBON OFFSETTING

Introduction

Chapter 16 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for allowable solutions / carbon offsetting:

Option 1 - Allowable solutions (including local carbon offsetting fund) to better enable developers to meet carbon targets

Option 2 - No allowable solutions (CO₂ reductions must be met on site); wait on further Government guidance,

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. Housing quality/condition is an important wider determinant of health.	★1	2
Housing	A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme.	★1	2
Community Cohesion	No notable implications.		
Accessibility	No notable implications.		
Economic Growth	No notable implications.		
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. This would reduce the need for heating and thus the emissions to air from boilers.		2
Noise	No notable implications.		
Energy and Carbon	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 2008. Plan-making should support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment. A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, reducing carbon emissions. However national government may rule out such an approach in favour of a national offsetting scheme.		2
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
Summary A local carbon offsetting fund (Option 1) could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact on housing could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme. Given that housing quality/condition and issues around fuel poverty are important determinants of health, Option 1 could also improve health outcomes and reduce health inequalities. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.			

APPENDIX XVI – COMMUNITY INFRASTRUCTURE

Introduction

Chapter 17 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for community infrastructure:

Option 1 - Policy to set location requirements for new / extended community facilities

Option 2 - No specific location requirements - accept facilities wherever proposed.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Provision of community facilities can help to reduce crime levels, particularly youth offending and anti-social behaviour, through providing opportunities for recreation and socialising. Option 1 would target community infrastructure where it is needed the most (where there are deficiencies in accessibility) which would likely have a more beneficial effect; although it is assumed that both Options would lead to a similar quantum of infrastructure being delivered in order to support growth.	★1	2
Education	Education facilities are an important type of community infrastructure and ensuring that schools are accessible can have a positive effect on educational attainment. Option 1 would target community infrastructure where it is needed the most (where there are deficiencies in accessibility) which would likely have a more beneficial effect; although it is assumed that both Options would lead to a similar quantum of infrastructure being delivered in order to support growth.	★1	2
Health	GP facilities and open space are types of community infrastructure that affect health and wellbeing and accessibility to these types of infrastructure is important to maintaining good health. As above, Option 1 would focus infrastructure where it is needed (in areas of growth of areas of deficiency) and therefore can be said to be the preferred option.	★1	2
Housing	No notable implications.		
Community Cohesion	Provision of accessible and high quality community facilities can enhance community cohesion through enabling social mixing amongst local residents. Investment in new and improved facilities in targeted locations (Option 1) is likely to have a more beneficial effect.	★1	2
Accessibility	If it can be assumed that one of the locational requirements under Option 1 is that the new/expanded infrastructure is in an accessible location, then it can be assumed that Option 1 would lead to provision of community infrastructure in more accessible locations than Option 2 which could come forward in myriad locations.	★1	2
Economic Growth	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
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. Community infrastructure can play a part in increasing educational attainment, training, workforce skills and qualifications. If under Option 1 such facilities are targeted in areas of low skills and high unemployment, Option 1 would likely lead to a more beneficial effect than Option 2.		2
Economic Inclusion	Putting new community infrastructure in the most impoverished areas of Haringey would increase attractiveness of neighbourhoods as places to live and work, and the ability of residents to take advantage of new employment opportunities. In this case Option 1 would be preferred as it would enable the developments to be put in areas of most need.		2
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	Open space is a type of community infrastructure. Certain parts of the borough are deficient in terms of access to open space. Targeted investment in new, expanded or enhanced open spaces in areas of deficiency could have a positive effect should it improve accessibility to open space.	=	
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	If it can be assumed that one of the locational requirements under Option 1 is that the new/expanded infrastructure is in an accessible location, then it can be assumed that Option 1 would lead to provision of community infrastructure in more accessible locations than Option 2 which could come forward in myriad locations.		2
Summary Community Infrastructure assets can help to enable regeneration and create a sense of place and improve people's quality of life. Haringey has existing pockets of deprivation and also areas of deficiency for different types of community infrastructure, as well as new growth in the pipeline that will need supporting infrastructure. Therefore, by locating new and enhanced infrastructure in specific locations, Option 1 is more likely to benefit existing and future residents than Option 2 which could take place anywhere in the borough. No draw-backs to Option 1 have been identified. N.B. Neither option is predicted to lead to a significant effect, hence there is no green or red shading within this appraisal table.			

APPENDIX XVII – OPEN SPACE PROVISION

Introduction

Chapter 18 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for community infrastructure:

Option 1 - Policy to allow for the reconfiguration of open space on site development proposals, where there would be no net loss of open space provision

Option 2 - Do not allow for reconfiguration of open space (maintain existing configuration).

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Well designed and laid out open spaces can improve the quality, accessibility and safety for its users. Reconfiguration will lead to opportunities to improve design and layout.	★1	2
Education	No notable implications.		
Health	The NPPF recognises the importance of Open Space to community health, stating that access to high quality open spaces can make an important contribution to the health and well-being of communities. There are localised open space deficiencies in Haringey, and it is also the case that Haringey's population is set to increase considerably. As such, access open space is an important health issue. Allowing the reconfiguration of open space should enable targeted improvements to be made to the open space 'resource' in those parts of the borough where there are currently deficiencies (see further discussion under 'open space', below). It is likely that the quality of open space, in terms of it's potential to support recreational activity and other typical open space uses, will improve. Reconfiguration will be undertaken with the caveat that there must be 'no net loss', and it is assumed that net loss will be measured on a site by site basis, as opposed to an area basis. Were net loss to be calculated on an area basis, then there might be a risk that there would be net loss in certain localities and/or a risk that the cumulative effect of reconfiguration would be open spaces become smaller and more fragmented in the long term (possibly with implications for health, if it is the case that larger open spaces are particularly important in this sense). Despite some uncertainties, it is appropriate to conclude that Option 1 is best performing and will lead to significant positive effects.	★1	2
Housing	Enabling the reconfiguration of open space will facilitate development; however, significant effects are not predicted.	★1	2
Community Cohesion	Well designed and laid out open spaces can improve the quality, accessibility and safety for its users. Reconfiguration will lead to opportunities to improve design and layout.	★1	2
Accessibility; Economic Growth; Skills and Training; Economic Inclusion; and Town Centres: No notable			

Topic	Discussion	Opt 1	Opt 2
implications.			
Biodiversity	There is a good evidence-base - in the form of the Open Space and Biodiversity Study (2013) and work to establish the Borough's Green Grid - to enable an understanding of those sites that perform an important biodiversity role, and an understanding of those areas where there is the potential for open space enhancements to lead to biodiversity benefits. There is good potential for 'intervention' to lead to biodiversity benefits, and hence the principle of reconfiguration is supported and identified as having the potential to lead to significant positive effects to biodiversity at the Haringey scale.	1	2
Townscape and Cultural Heritage	Reconfiguration might well involve a change to the existing character of the open space, which may be understood to hold a heritage value.	2	1
Open Space	Open Space is protected from inappropriate development by Strategic Policy SP 13. The Council will not grant planning permission for proposals for development that would result in the loss of open space, unless an assessment has been undertaken which shows that the open space is surplus to requirement for use as an open space. A policy approach enabling reconfiguration will be applied with a view to ensuring no-net loss, and also with a view to addressing existing deficiencies and delivering targeted enhancements to quality. There is much opportunity, and hence Option 1 is supported; however, it is recognised that there might also be some risk involved with reconfiguration. The nature of open spaces will change, and there could be cumulative effects over time. It will be important to monitor implementation of the no-net-loss policy.	1	2
Water Resources; Soil and Land Quality; Flood Risk and Climate Change; Air Quality; and Noise: Open space can contribute to objectives, and it might potentially be the case that reconfiguration can facilitate this. However, there is no certainty.			
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	Reconfiguration of open space will enable opportunities to be realised in relation to walking/cycling links.	1	2
<u>Summary</u> Allowing the reconfiguration of open space should enable targeted improvements to be made to the open space resource in those parts of the borough where there are currently deficiencies. It is likely that the quality of open space, in terms of it's potential to support recreational activity and other typical open space uses, will improve. This has positive implications in terms of a range of objectives, with significant positive effects predicted in terms of 'health'. It is also the case that targeted enhancements should enable biodiversity (Green Grid) opportunities to be realised, to a significant extent. A policy of enabling reconfiguration does, however, lead to some risks in terms of 'Townscape and Cultural Heritage' given that reconfiguration might well involve a change to the existing character of the open space. More generally, there is the possibility that reconfiguration of numerous open spaces could have unforeseen effects in the long term, and so monitoring will be important.			

Sustainability Appraisal (SA) of the Site Allocations DPD

SA Report

Published alongside the pre-submission version of the plan

November 2015



Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	SA Report published alongside the pre-submission version of the Site Allocations DPD	Mark Fessey, Principal Consultant	Steve Smith, Technical director	Steve Smith, Technical director

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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 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 period 2011-2026.
- 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 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 **Table 2.1** explains more about the regulatory basis for answering these 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 other 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)

Table 2.1: Questions answered by this SA Report, in-line with Regulatory⁵ requirements

PRIMARY QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What has plan-making / SEA involved up to this point? [See Part 1 , below]		- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SEA findings at this current stage? [See Part 2 , below]		- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next? [See Part 3 , below]		A description of the monitoring measures envisaged
OTHER QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What's the plan seeking to achieve?		An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What's the scope of the SEA?	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment

N.B. The right-hand column of Table 2.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

Also, **Appendix II** presents supplementary information (in the form of a checklist) to further explain how/where regulatory requirements are met within this report.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

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 strategic development sites which will assist the Borough in delivering the spatial strategy set out in the Strategic Policies Local Plan.
- 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; the London Plan (2015), 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 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.⁶
- 4.1.3 As such, an SA Scoping Report⁷ 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.

⁶ 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.'*

⁷ 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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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?

4.1 A note on 'equalities' and 'health' considerations

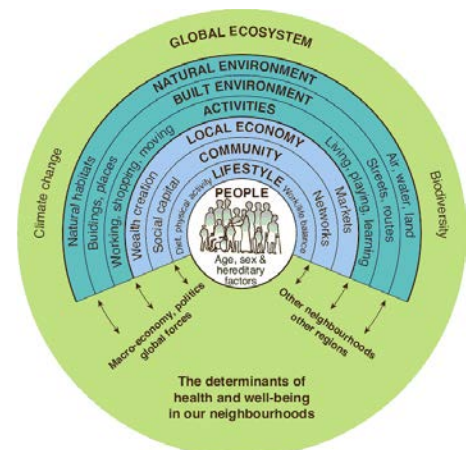
- 4.1.1 Equality and health considerations were a focus of SA scoping work. As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence the SA process 'integrates' Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). **Appendix IV** signposts to areas within this report where EqIA and HIA has 'fed-in'.

Box 4.1: EqIA and HIA

The Council has 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**, 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.

Determinants of health and wellbeing in our neighbourhoods, from Barton & Grant (2006)



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

Chapter 7 - Presents appraisal findings in relation to reasonable alternatives

Chapter 8 - 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 alternatives appraisal, development of the draft (pre-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).

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 CONSIDERED

6.1 Introduction

- 6.1.1 The aim of this chapter is to explain the sets of alternatives that have been a focus of appraisal, with a view to demonstrating the 'reasonableness' of the approach taken.
- 6.1.2 Alternatives were selected for appraisal in 2015, but in order to set the context for this work there is firstly a need to explain work undertaken by the Council in 2013/14.

6.2 Background to the selection of alternatives (work undertaken in 2013/2014)

- 6.2.1 The Council's preferred *broad* 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.

Establishing the preferred site package

- 6.2.3 The preferred site package was established subsequent to a multi-stage process which involved:

- Gathering a long list of all potentially available sites in the borough;
 - A long list of site options was established in-light of a 'Call for Sites' exercise (2013); and a Strategic Housing Land Availability Assessment (SHLAA) process undertaken by the London Borough of Haringey (LBH) and the Greater London Authority (GLA). This was supplemented with a list of sites otherwise 'in the system', e.g. where pre-application discussions had taken place.
- Drawing on sources of technical evidence - such as the Strategic Housing Market Assessment, Employment Land Review, existing Development Frameworks, Viability Study, SFRA, and Open Space Assessment – to establish site specific issues.
- Initial analysis and workshops to **screen out sites** with 'showstopper' constraints;
 - Factors related to community considerations (school site, transport asset site, existing infrastructure site, employment considerations (designated employment land, i.e. 'SIL'), environmental considerations (e.g. Green Belt, Metropolitan Open Land, Lee Valley Regional Park, Site of Importance for Nature Conservation, Allotments, Flood Zone 3a/3b) and other cumulative considerations that would affect deliverability (e.g. limited building heights, strategic views, listed buildings, Conservation Area).

- 6.2.4 There was **limited potential to screen-out sites** given the need to meet housing and employment targets, and the broad spatial strategy that is established through the adopted Strategic Policies DPD (2013). With regards to housing and employment targets, the London Plan (2011) housing target between 2011 and 2015 was 820 net dwellings per annum; however in-light of the published Further Alterations to the London Plan (FALP, March 2015) the target will be 1,502 dwellings per annum. Over the plan period (2011-2026) this creates an overall strategic delivery target of 19,802 net additional dwellings in Haringey. The Tottenham AAP will accommodate a minimum of 10,000 of these dwellings and so there is a need to deliver the remaining dwellings across the rest of the borough, particularly in identified Growth Areas and Areas of Change. The FALP also sets a target for a significant increase in the number of jobs in Haringey from 73,000 jobs in 2011 to 85,000 jobs in 2026. This will necessitate a move towards employment types that require less floorspace per employee.

Establishing preferred uses / policy approaches for each site

- 6.2.5 The Council went through a systematic process of defining and applying a set of ‘rules’ with a view to establishing the uses that might be suitable at each of the preferred sites. The following rules were applied:
- A site is potentially suitable for **residential** development *unless* it is a Designated Employment Area (DEA = LSIS, EL or SIL)
 - A site is potentially suitable for **employment** development where it is a DEA, in a town centre, or where PTAL is good (4 or above)
 - A site is potentially suitable for **town centre** uses if it is within a town centre
- 6.2.6 Applying these rules led to the identification of potentially suitable uses for each site.⁹ Subsequently, a preferred policy approach was developed, factoring-in consultation findings from the previous Regulation 18 consultation (January 2014), and also the findings of a further series of workshops (with each dedicated to a sub-area within the Borough).

6.3 Selecting alternatives (2015)

- 6.3.1 This section first gives consideration to the process of developing reasonable alternatives in early 2015, and then gives consideration to the process of refining understanding of the reasonable alternatives in late 2015.

Early 2015

- 6.3.2 A meeting was held between Council officers and the SA consultants in January 2015, with a view to identifying instances where the preferred approach to particular sites is more difficult to explain / justify. The intention was to identify a number of such sites, and then establish alternative uses (which could then be the focus of appraisal).
- 6.3.3 However, at the meeting it was recognised that, rather than appraising alternatives in relation to specific sites, a more appropriate approach is to appraise alternatives in relation to broad issues – see Table 6.1.

Table 6.1: Sets of alternatives established in January 2015

Issue	Option 1	Option 2
Office uses in Wood Green	Reduction in office uses, despite high accessibility (PTAL)	Promotion of office uses prevalent, commensurate with high PTAL
Non-designated employment sites	Generally maintain employment function where PTAL is high	Generally maintain employment function where PTAL is moderate or high
Haringey Warehouse District	Allow a mix of uses including residential	Maintain as employment, reflecting employment designation
Open space	Do not allocate sites for purely open space	Seek to allocate sites for purely open space

⁹ The February 2015 Interim SA Report explained this step of ‘considering alternative uses for each site’ in greater detail. It was helpful to consider alternatives in early 2015; however, things have moved on since that time (including because at that time the possibility of assigning open space or community infrastructure uses to allocations was a consideration, whilst the view now is that this should not necessarily be the role of the Site Allocations DPD, i.e. it is more appropriate to rely on DM policies and the Infrastructure Delivery Plan, where the need for site specific infrastructure is not clearly needed to support delivery of the spatial strategy).

6.3.4

Other broad issues were discussed at the meeting, on the basis that there could be merit to giving systematic consideration to alternatives, before being ‘screened-out’ as not (‘reasonably’) necessitating alternatives appraisal. The following issues were screened-out:

- Community infrastructure uses
 - Consideration was given to ‘rules’ that might be applied with a view to identifying alternative approaches that might be taken to community infrastructure delivery; however, on balance it was determined inappropriate to give detailed consideration to community infrastructure at this stage. The preferred approach is to avoid being overly prescriptive, on the basis that an Infrastructure Delivery Plan update is in development. It is also the case that it is appropriate to firstly determine / consult on a preferred spatial approach to development, and then subsequently determine an approach to community infrastructure delivery to appropriately support that development. It was also recognised that the emerging Development Management Policies DPD could help manage requirements for infrastructure on new development, having regard to the IDP.
 - Where there was a clear need or opportunities for site specific infrastructure to support delivery of the spatial strategy, it was considered reasonable to set relevant requirements in the Plan’s site policies. Regulation 18 consultation responses were particularly helpful in flagging key opportunities for delivery of infrastructure, such as for sustainable transport and flood risk management.
- Town centre uses
 - The preferred approach is to ensure that Town Centre uses are directed only to the designated town centres, and an alternative approach could potentially involve introducing a degree of flexibility. On balance, however, it was determined that the alternative approach does not necessitate appraisal at this stage.
- Town centre boundaries
 - The Strategic Policies Local Plan aims to protect and enhance Haringey’s town centre hierarchy, including by positively planning for the future distribution of additional retail capacity. The boundaries of town centres are an integral part of town centre management and therefore merit consideration in plan preparation. This is particularly in view of local evidence which suggests a need to accommodate additional retail capacity to meet the needs of Haringey’s future population over the plan period. In order to accommodate additional retail capacity, there is an option to deliver this *within* the existing hierarchy and established town centre boundaries. However, the preferred approach is to accommodate planned future retail capacity through an *extension to* the town centre boundaries. This is considered a more flexible option for delivering capacity, taking into account committed growth and expected population increases, as well as future transport improvements.
- Development within Conservation Areas
 - The preferred approach is to allocate some sites within designated Conservation Areas, and an alternative approach could potentially involve ruling out allocation within Conservation Areas. On balance, however, it was determined that the alternative approach does not necessitate appraisal at this stage. The matter of development within Conservation Areas is more appropriately addressed through the setting of criteria-based policy within the Development Management Plan.

Late 2015

- 6.3.5 Whilst the alternatives discussed above were the focus of appraisal and consultation in early 2015, the view of the Council now is that it is appropriate to refine understanding somewhat. Specifically, having regard to public consultation feedback and other technical evidence, the view of the Council has shifted in relation to 'Non-designated employment sites', where there is a greater emphasis on retaining employment generating land and floorspace. The view of the Council is that the decision on whether or not to redevelop non-designated employment locations for residential uses should generally be taken on a site-by-site basis, recognising that an overarching objective is to protect against the loss of employment land in; including for non-designated sites. This can be appropriately managed through the Development Management Policies DPD.
- 6.3.6 This would seem a reasonable approach to take, although it is noted that the appraisal of alternatives from February 2015 did find that a clear strategy of considering residential uses at non-designated employment sites in all cases except where PTAL is high performs well in terms of a range of sustainability objectives, with the exception of 'economic inclusion' objectives.
- 6.3.7 Table 6.2 lists the refined reasonable alternatives.

Table 6.2: The reasonable alternatives

Issue	Option 1 (the preferred option)	Option 2
Office uses in Wood Green	Reduction in office uses, despite high accessibility (PTAL)	Promotion of office uses prevalent, commensurate with high PTAL
Haringey Warehouse District	Allow a mix of uses including residential	Maintain as employment, reflecting employment designation
Open space	Do not allocate sites for purely open space	Seek to allocate sites for purely open space

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 four sets of alternatives introduced above (in Chapter 6). Summary appraisal findings are presented in this Chapter, with detailed appraisal findings presented in the **Appendices V - VIII**.
- 7.1.2 The methodology is explained in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each option in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

7.2 Office uses in Wood Green

7.2.1 The table below presents summary appraisal findings in relation to the following alternatives:

- **Option 1** – Managed reduction in office uses, despite high accessibility (PTAL)
- **Option 2** – Promotion of office uses prevalent, commensurate with high PTAL

N.B. These are the same alternatives that were considered within the February 2015 Interim SA Report, and it is also the case that alternatives appraisal findings are largely unchanged.

Table 7.1: Summary appraisal findings: Office uses in Wood Green

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Housing	★1	2
Community Cohesion	★1	2
Accessibility	★1	2
Economic Growth	★1	2
Economic Inclusion	=	
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
Sustainable Transport	2	★1
Option 1 (Managed reduction in office uses) performs best in terms of a range of sustainability objectives, stemming from the suggestion that this approach will support a targeted approach to regeneration in Wood Green, leading to a diversification of uses and a situation whereby the town centre is vibrant and has a clear role to play sub-regionally. It is not thought that a decision to reduce office space in Wood Green will have negative implications from an economic growth perspective, given that there are a number of other areas locally where demand for offices is high, and the effect of regeneration in Wood Green should be to enhance the image of Haringey in general as a place to do business and invest. The draw-back to Option 1 relates to 'sustainable transport' objectives; however, there are other locations with high PTAL that are set to be a focus of office development.		

7.3 Haringey Warehouse District

7.3.1 The table below presents summary appraisal findings in relation to the following alternatives:

- **Option 1** – Allow a mix of uses including residential
- **Option 2** – Maintain as employment, reflecting employment designation

N.B. These are the same alternatives that were considered within the February 2015 Interim SA Report, and it is also the case that alternatives appraisal findings are largely unchanged.

Table 7.2: Summary appraisal findings: Haringey Warehouse District

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Health	★1	2
Housing	★1	2
Community Cohesion	★1	2
Economic Growth	★1	2
Skills and Training	★1	2
Economic Inclusion	?	?
Sustainable Transport	2	★1
Option 1 (Allow a mix of uses including residential, despite employment designation) is likely to lead to widespread benefits given existing issues around unauthorised warehouse living (not least around poor living environments) and the fact that supporting the creative sector is an important economic objective for Haringey. There are potentially some draw-backs – including those that relate to the loss of floorspace for traditional industries – but it is anticipated that policy measures can be put in place to mitigate effects.		

7.4 Open space

7.4.1 The table below presents summary appraisal findings in relation to the following alternatives:

- Option 1 – Do not allocate sites for purely open space (focusing instead on quality/access)
- Option 2 – Seek to allocate sites for purely open space

N.B. These are the same alternatives that were considered within the February 2015 Interim SA Report, and it is also the case that alternatives appraisal findings are largely unchanged.

Table 7.3: Summary appraisal findings: Open space

Relevant sustainability topics	Option 1	Option 2
Crime	★ 1	2
Health	=	
Housing	★ 1	2
Accessibility	★ 1	2
Economic Growth	★ 1	2
Biodiversity	=	
Townscape and Cultural Heritage	=	
Open Space	=	
Water Resources	★ 1	2
Flood Risk and Climate Change	★ 1	2
Air Quality	=	
Noise	=	
Sustainable Transport	★ 1	2

There is difficulty in increasing the quantity of public open space in Haringey, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. Benefits of a Green Grid approach will be wide-spread, and hence 'significant positive effects' are predicted under a number of topic headings, most notably 'transport' and 'accessibility'.

8 REASONS FOR SELECTING THE PREFERRED APPROACH

8.1 Introduction

- 8.1.1 The aim of this chapter is to explain the Council's reasons for selecting the preferred approach subsequent to and in-light of alternatives appraisal. In other words, the aim of this chapter is to explain why the preferred strategy (as presented within the current pre-submission plan) is 'justified', i.e. the most appropriate strategy in-light of reasonable alternatives.

8.2 The Council's reasons for selecting the preferred approach

Office uses in Wood Green

- 8.2.1 The Further Alterations to the London Plan downgraded Wood Green's status as a preferred office location. While the Council is keen to maximise employment opportunities in the borough, and in particular within Wood Green and Tottenham, both the ELR and workspace viability study show that Wood Green faces challenges from cheaper stock outside of London and preferential locations in central London. It is therefore not deliverable approach to plan for significant large-scale office in this area, rather small scale and flexible workspace, or public sector occupants should be sought. Either way, the current stock is not of a high quality, and regeneration is a suitable approach to attracting investment to the centre. In addition, there is a risk that Permitted Development Rights allowing conversion from office to residential uses would threaten a strategic approach reliant on office development.

Haringey Warehouse District

- 8.2.2 The Council is committed to addressing the issue of warehouse occupation in parts of the south of the borough. As with non-designated employment sites above, the building stock in these areas is not always suitable for knowledge-based industries. Consultation with commercial agents in the area shows that there is interest from occupants to move to this area, which can be attributed to the improving reputation of the area being brought about by the warehouse occupants. The challenge now lies in harnessing this reputational uplift, and translating it into jobs. Therefore the Council is proposing a policy position that creates masterplan-led development which creates new employment floorspace, while creating spaces that the existing residential community wish to remain in and which would appeal to other potential occupiers.

Open space

- 8.2.3 Areas of the borough are deficient in open space. Competing against this are significant jobs and homes targets, which make the allocation of significant new open spaces very challenging. It is therefore the Council's aim that existing network of open spaces should be enhanced, and linkages to them improved, so that the borough's growing population can better access and utilise the existing open space assets within the borough.

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 'pre-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

- 10.2.1 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach – i.e. the proposed Partial Review - on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

• Crime	• Economic inclusion	• Flood risk and climate change
• Education	• Town centres	• Air quality
• Health	• Biodiversity	• Noise
• Housing	• Townscape and cultural heritage	• Energy and carbon
• Community cohesion	• Open space	• Waste management
• Accessibility	• Water resources	• Sustainable transport
• Economic growth	• Soil and land quality	
• Skills and training		

- 10.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.

- 10.2.3 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

- 10.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹⁰ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

10.3 Crime

- 10.3.1 The plan is set to make **better use of under-used sites**, and in this way it will lead to positive effects in terms of crime and fear of crime. It is notable that the plan will bring a number of employment sites into more intensive uses. Increased passive surveillance could help to reduce localised crime.
- 10.3.2 Site Allocations for two sites directly reference the need for **passive surveillance**:
- SA 17: North of Hornsey Rail Depot (Wood Green) - *“Buildings along Hampden Road should create an appropriate street frontage, providing passive surveillance for users of Hornsey station.”*
 - SA 34: Overbury & Eade Rds (South of the borough) – *“Create active frontages to ensure passive surveillance.”*
- 10.3.3 Others that could potentially benefit from specific wording in relation to crime include:
- SA28: St Ann’s Hospital (South of the borough) – where it is anticipated that a route through the site will serve to link adjacent areas.
 - SA61: Barber Wilson (East of the borough) – where the aim is for infill development to facilitate an improved green grid link between Wood Green and Tottenham through Lordship Rec (with possible deculverting of the Moselle river).
- 10.3.4 Policy for several other sites references measures that could have a more indirect benefit in terms of crime / fear of crime. For example:
- SA 33: Vale/Eade Rd (South of the borough) – *“The new link should provide a straight, secure, pedestrian and cycling route.”*
 - SA 36: Finsbury Park Bowling Alley (South of the borough) – *“The entrance to the park from Station Place will be enhanced, with a clear, visible, open pedestrian and cycling route provided.”*
 - SA 38: 460-470 Archway Rd (Highgate) - *“The opportunity for provision of a new entrance to Highgate Wood should be explored...”*
- 10.3.5 There is potentially some degree of ‘trade-off’ between facilitating access through support for **new pedestrian and cycle routes**, and wishing to minimise crime / fear of crime. A strategic approach to access enhancements should help to ensure that routes are well used, and setting DM policy through the Site Allocations DPD should help to ensure that new routes only come forward where they are well designed (including to ensure good surveillance); however, this is an issue that should be a focus of further consideration (and potentially monitoring post plan adoption). It is noted that street lighting is a matter requiring ongoing investment in the emerging update to the Infrastructure Delivery Plan.
- 10.3.6 In **conclusion**, the proposed approach would likely lead to **significant positive effects** on the baseline, although there will further opportunities to design-out crime beyond those discussed above. This is a matter that should be the focus of plan-making, and of course will also need to be a focus of detailed investigations at the planning applications stage.

10.4 Education

- 10.4.1 Using the latest available data the Council will look to respond to school place projections as necessary, and also respond to any major residential development that is likely to impact upon demand for school places.¹¹ A response will be necessary in the designated Growth Areas (Tottenham Hale, North Tottenham and Wood Green); and where need for additional capacity is identified, this might be delivered in one of three ways: bulge classes (not sustainable for long term increased provision), expansions and new (free) schools as a part of major sites.
- 10.4.2 In terms of school capacity, the Site Allocations DPD need not allocate some land for additional provision (although an allocation is made through the Tottenham AAP). The February 2015 consultation document proposed the allocation of land for the expansion of St James C of E Primary, in order to address a possible shortfall in primary school places in Muswell Hill/north Bounds Green; however, due to updated deliverability and school need information, the school proportion of this allocation has been deleted. The Council states that: *“The decision not to proceed with consultation on the expansion of one or more Muswell Hill schools is based on projected overall local sufficiency of places until 2024 and accords with the agreed place planning principle of the need to meet (but not to exceed) the demand for school places in the local area... The Council has a duty to ensure sufficiency of primary and secondary school places for children of compulsory school are available for their area. Feasibility work was agreed on an evidence base of projections that showed unmet demand in the coming years. Current projections now show overall sufficiency of places across the borough up to 2024, although with an acknowledgement that there is greater surplus in some areas, and that projections show we will need to increase capacity in Tottenham and the Wood Green borders from 2020.”* It is, however, noted that the adjacent allocation at SA 51: Cranwood Care Home references the need to design the scheme (residential) in the knowledge that expansion of the adjacent school may prove necessary.
- 10.4.3 It is important to emphasise that the **Infrastructure Delivery Plan (IDP)** update will assist in setting out an assessment of future need over the plan period, and once this assessment is in place detailed measures will be considered. Also, the anticipated need in Wood Green will be addressed in the forthcoming Wood Green AAP.
- 10.4.4 Finally, it is important to reference SA 41: Highgate School. The proposal is for: *“Exploration of how school facilities can be enhanced while simultaneously benefitting local communities including potentially increasing accessibility through the site.”* A Supplementary Planning Document (SPD) will be prepared to guide development on this site.
- 10.4.5 In **conclusion**, it seems appropriate that the Site Allocations DPD need not have a major focus on education provision, but there will be increased clarity once the IDP update is completed.

10.5 Health

- 10.5.1 It is clear that facilitating **walking/cycling** and access to green / **open space** is a major ‘driver’ of the plan. Policy will be put in place to ensure that opportunities are realised as far as possible. Some site allocations set out to create connections, whilst others set out to enhance adjacent elements of the existing ‘network’. This matter is considered in detail below under the headings of ‘Open space’ and ‘Sustainable transport’.
- 10.5.2 Access to **health facilities** is another important issue. Two site allocations propose new health facilities in the borough: at Wood Green Library, and the Hawes and Curtis site on Green Lanes. This is in response to information received from NHS England regarding likely unmet demand in these areas. It is considered that when delivered, these sites will acceptably meet need for health premises in the borough. The **Infrastructure Delivery Plan (IDP)** update will set out a full assessment of future need over the plan period, and once this assessment is in place detailed measures will be considered.

¹¹ Haringey’s latest School Place Planning Report is available at <http://www.haringey.gov.uk/schoolplaceplanning>

- 10.5.3 Other health related issues relate to housing, air quality, noise and soil contamination. All of these issues are given stand-alone consideration below.
- 10.5.4 In **conclusion**, the plan will likely lead to **significant positive effects** given its emphasis on realising opportunities to provide new health facilities, as well as enhanced walking/cycling infrastructure and access to open space. As things stand, there is little emphasis on delivery of health facilities; however, it is understood that further discussions with relevant stakeholders and providers will be undertaken, and the findings of the IDP update will inform the final decisions taken at sites (at the planning application stage).
- 10.6 Housing**
- 10.6.1 Allocations made through the Site Allocations DPD will ensure that the appropriate amount of land is allocated to meet the borough's **housing target**. Very few sites are set to be developed with no residential element, which serves to demonstrate that efforts are being made to maximise housing delivery.
- 10.6.2 The plan is not set to allocate smaller (less than ten dwellings or 0.25ha) sites (as this would be impractical). There has historically been some reliance on small sites, although it is noted that emerging policies in the DM DPD may reduce the numbers of **conversions** coming forward over the plan period, in order to protect family-sized housing. The Council is not relying on smaller sites to meet its housing target.
- 10.6.3 There are limited references to the **type of housing** that should come forward at particular sites, which is appropriate given that this issue is a focus of the DM DPD. The following references are notable:
- SA 13: Bury Rd Car Park (Wood Green) – establishes that existing social housing will need to be reprovided on the site or another local site.
 - SA 44: Hillcrest (Highgate) – requires provision of affordable housing. It is noted that the **previous version** of the policy (Feb 2015) referenced 'social' housing.
- 10.6.4 It is also noted that SA 58 (Red House; East of the borough) – proposes the redevelopment of a **care home** and church building (to create a continued town centre frontage, new homes, and potentially a reconfiguration of open space); however, it is understood that there is sufficient care home capacity locally. Also, SA 51 Cranwood Care Home (Muswell Hill) supports redevelopment of a vacant care home.
- 10.6.5 There are specific 'housing' issues in the **Haringey Warehouse District** that are set to be addressed through an overarching DM Policy and associated allocations at: SA 30: Arena Design Centre, Crusader Industrial Estate (SA 31), Omega Works (SA 32), Vale/ Eade Rds (SA 33), Overbury & Eade Rds (SA 34) and Land between Seven Sisters and Tewkesbury Rds (SA 35). On these designated industrial sites non-conventional residential development ('warehouse living') will be supported where sufficient living standards can be demonstrated, e.g. though demonstration of access arrangements, physical condition and layout of the existing buildings and accommodation on the site, and a return of dedicated employment floorspace to the area can be accommodated. Proposals for warehouse living on industrial sites not identified through policy will be resisted, and in this way existing problems associated with unauthorised warehouse living (e.g. around poor living environments impacting on the health of some individuals, typical of Houses in Multiple Occupation) will be addressed.

10.6.6 With regards to the specific issue of **Gypsy and Traveller** accommodation needs, the plan document is clear that sites which are being transferred from B2/B8 employment to a mix of uses provide the best opportunities for accommodating the Council's existing and emerging need.¹² However, as things stand the potential to provide for Gypsies and Travellers is not identified for any particular sites. There is one site specific reference currently: SA 5 (LBH Civic Centre, Wood Green) references the need to retain the traveller pitches adjacent to the site, and protect their amenity. An ongoing study is exploring the needs of the Gypsy & Traveller communities.

10.6.7 In **conclusion**, a targeted approach to housing delivery is set to be implemented through the plan, i.e. one that seeks to make best use of every site, recognising that opportunities / constraints vary considerably. **Significant positive effects** are predicted. Some concerns are raised around provision for Gypsies and Travellers, however.

10.7 Community cohesion

10.7.1 A number of targeted measures are set to be put in place to the benefit of community cohesion.

10.7.2 At **Haringey Heartlands** the intention is to create a sense of place through provision of a new urban square at Clarendon Square, and an enhanced Cultural Quarter at the Chocolate Factory and Parma House sites. For example, at SA 18: Wood Green Cultural Quarter (north) the intention is to enhance the public realm and ensure a focal point of the Cultural Quarter in the south of the site around Clarendon Road. Policy will require active frontages to both sides of Clarendon Road that contribute to the cultural output of the area.

10.7.3 Site specific proposals within the **Haringey Warehouse District** also reflect an overarching strategy, *to some extent*. Local residents have identified positives associated with having a creative community living nearby, and there are opportunities to capitalise on this through creation of space that can facilitate events and help to ensure the local community enjoys the spoils of the local cultural output. There are few DM requirements proposed that have an explicit focus on delivering this vision (although there are some, e.g. SA 34: Overbury & Eade Rds requires fine-graining of the street network in this area encouraging pedestrian permeability), but supporting text states that "further masterplanning may be desirable... this could include an SPD".

10.7.4 There are **numerous other instances** of site allocation policy referencing measures that will lead to benefits in terms of community cohesion. For example:

- SA 7: Wood Green Bus Garage – A new urban square will be created on the podium above the bus stabling.
- SA 11: Wood Green Library – Development at this important site (which signals the connection between Wood Green and its western hinterland) will provide for a new urban square with a pedestrian and cycling link through to Clarendon Square, enhanced town centre uses and a new library (plus residential development). The effect will be to help ensure a clear 'circuit' within the Centre.
- SA 15: Westbury & Whymark Aves (Wood Green) references the need for building to be set back at ground floor level to increase space for circulation along Wood Green High Rd, while also providing active frontages.
- SA 39: Former Highgate Rail Station & Gonnerman Antiques Site (Highgate) – *"Uses on the station site should enable the station to become a destination providing a range of functions that benefit the local community and help to draw visitors to the area."*

¹² This is due to the change of value between the existing and future land values is generally higher on these sites than on residential intensification schemes. This will allow for greater flexibility in terms of site design, which will better enable an appropriate site being created for pitch provision.

- 10.7.5 Finally, it is important to reference SA 23: Clarendon Rd South (Haringey Heartlands), which will impact on an existing **West Indian Cultural Centre**. Policy is set to require that alternative provision is agreed before development proceeds.
- 10.7.6 In **conclusion**, site specific opportunities for designing-in features to encourage community cohesion are set to be realised, and furthermore the policy approach to sites in Haringey Heartlands and Haringey Warehouse District will act in combination to ensure development of 'sustainable communities'. **Significant positive effects** are predicted.

10.8 Accessibility

- 10.8.1 As discussed above, under the 'Health' heading, there are few instances of policy within the draft plan looking to prescribe the community uses that should come forward at particular sites; rather, policy is flexible in this respect. This reflects the fact that a review of the Council's **Infrastructure Delivery Plan (IDP)** is underway to understand the levels of new infrastructure required in order to accommodate an increased population in Haringey.
- 10.8.2 There are many instances of sites being set to contribute to *improving* accessibility to some extent through the focus on ensuring **enhancements to movement / permeability**. In terms of more direct impacts (i.e. instances of sites directly **impacting on existing facilities**) the following sites are notable –
- SA 28 St. Ann's Hospital Site (South of the borough) - The site will be developed as residential in order to enable a rationalisation of the health facilities.
 - SA 36: Finsbury Park Bowling Alley (South of the borough) – The Twelve Pins pub should be retained, and an acceptable community / leisure facility must be provided to replace the bowling alley (which is listed as an asset of community value).
 - SA 41: Highgate School – There will be further consideration of how school facilities can be enhanced while simultaneously benefitting local communities including potentially increasing accessibility to and through the site.
 - SA 57: Myddleton Road Local Centre (East of the borough) – *"Diversification of uses on Myddleton Road, enhancements to the urban realm, and improvements to local connections to encourage an increasingly viable and wider range of food and drinks establishments within the local centre."* It is clear that shifts in the uses at this local centre will need to be the focus of further consideration / monitoring.
- 10.8.3 In **conclusion**, whilst there remains uncertainty around whether or not the plan will put in place the necessary policy to ensure delivery of sufficient community infrastructure, the plan is set to perform well in that there is a focus on enhancements to movement / permeability. It is noted that the majority of strategic transport improvements will be taken at the London-wide level (by TfL).

10.9 Economic growth

- 10.9.1 The Further Alterations to the London Plan (2015) set out revised employment projections for Haringey. The FALP forecasts 12,000 additional jobs in the borough over the period 2011 – 2026. Over the period 2011 – 2036, it forecasts an additional 22,000 jobs in Haringey. This represents a 29.5% increase in jobs, the highest projected employment growth rate of all London boroughs.
- 10.9.2 At the same time, Haringey contains a number of employment sites that contain poor quality buildings, many of which are approaching the end of their functional lives, and have the potential to be used more intensively for knowledge-oriented uses. As such, a number of sites are allocated for **redevelopment** to encourage the development industry to invest in bringing the land forward into a new, **more intense employment use**, thereby enabling jobs growth.

- 10.9.3 In some cases, renewal will likely include allocating employment sites for mixed use redevelopment where a cross subsidisation through residential development can increase employment densities, and therefore, job numbers on the site. At a number of sites, the employment floorspace will decrease significantly, but there is an expectation that the **jobs density** on-site will increase. The average job density across Haringey's employment sites is currently 44m² per job, but redevelopment for office uses can enable a job density at a given site of 12-16m² per job.
- 10.9.4 In a number of instances the preferred approach is to redevelop sites currently with one storey of workspace to four storey mixed use with one storey used for employment (the others being residential) at an increased job density, leading to an increase in the number of jobs onsite. The Roundway (SA 64) in the east of the Borough is an example of a site where a scheme like this can be expected. Green Ridings House (SA 6) in Wood Green is another notable example of a site that will see a large decrease in employment floorspace but an increase in jobs onsite, although this is something of a special case as the building onsite is an old telephone exchange.
- 10.9.5 Public Transport Accessibility Level (**PTAL**) is a key factor that has influenced the approach taken for particular sites. Generally, an increase in jobs through mixed-use redevelopment is being sought on sites with a good PTAL rating (3+), whilst protection of existing job levels is acceptable on sites with a poor PTAL rating. There are limited exceptions to the principle where the number of jobs on sites will decrease significantly despite a high PTAL rating. The prime example is Station Rd Offices (SA 8) in Wood Green, where the employment floorspace will decrease from 24,700 m² to 4,800m² once residential dwellings are delivered; however, this site is currently an 8-10 storey office block, which is not an appropriate use given the need to deliver new homes in **Wood Green** (which will benefit the local economy in a different way).
- 10.9.6 The approach set to be taken in the **Wood Green Cultural Quarter** is also notable. As with other sites in Wood Green, there are currently multi-storey buildings used for employment, and a considerable loss of floorspace will be accepted (given wider objectives for the sites and surrounding area); however, with an increase in jobs density it is not expected that the number of jobs onsite will change significantly. Within the previous version of the plan (Feb 2015) each site was assigned an employment floorspace percentage target (either 50% or 33%); however, these targets have now been replaced with a requirement for the maximum floor space viable (as in the DM Policies DPD).
- 10.9.7 The approach set to be taken in the **Haringey Warehouse District** is also notable. The aim is to reintroduce employment floorspace on these sites, so creating a genuine mix of employment and warehouse living, while re-providing for current occupants (mixed use development), with cross subsidy from another higher value use. For example, at Arena Design Centre (SA 30) redevelopment will provide for commercial floorspace with the number of jobs and job density is increased, with policy stating that: *"The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the re-introduction of creative employment uses."* There is general commitment within Policy SA2 that: *"In Warehouse living areas, as part of the regulation of these area, the original floorspace before conversion to residential use began will be replaced as part of new developments."* It is notable that the **PTAL** rating for this site is low, at 1 – 2, but permeability improvements in the local area are proposed to mitigate this.
- 10.9.8 There are three examples of builders yards that will be redeveloped for residential, with either a mix of employment, or else improving local pedestrian routes. The PTAL at each is 3 or below -
- SA 27: Wightman Rd (South of the borough) - redevelopment of existing builders yard for residential to enable an improved east-west connection along Burgoyne Rd.
 - SA 38: 460-470 Archway Rd (Highgate) - redevelopment of existing builders yard to develop new residential buildings and employment use.

- SA 43: Summersby Rd (Highgate) - redevelopment of existing builders yard for a mix of new employment, residential development, and potentially a hotel.

10.9.9

Other strategic issues that are set to be addressed through the Site Allocations DPD relate to Crossrail 2, Wood Green / Haringey Heartlands and Haringey Warehouse District.

- Crossrail 2 is expected to serve the borough with enhanced stations at Seven Sisters, Turnpike Lane and Alexandra Palace stations. Policy SA1 addresses the Council's emerging approach to managing land around the stations, with a view to ensuring that challenges and opportunities are addressed.
 - Sites within 400m (a 5 minute walk) of a proposed Crossrail 2 station will be closely scrutinised to ensure the proposed development optimises the future accessibility provided by the introduction of Crossrail 2. This may include ensuring a mix of uses and potentially enhanced infrastructure.
 - Sites within 1000m (10 minute walk) will be examined for how they can complement the introduction of Crossrail 2. This may include design issues such as provision of routes to and from the station, and consideration of density to include future PTAL increase.
- Wood Green is a designated growth area, and numerous site allocations are set to ensure a coordinated approach that will ensure that economic opportunities are realised including economic opportunities that link closely to the Centre's civic role. Traffic congestion is a specific issue that is set to be addressed through specific policy, with SA 29 (Arena Retail Park) requiring that development reduces traffic on Green Lanes.
- A new local strategic policy for the Haringey Warehouse District within the DM DPD (DM39) seeks to increase the number of jobs in the area, and preserve the creative community that is currently present. Certain sections of LSIS are retained under Policy SA 1, but other sections are proposed to be changed to Local Employment Area: Regeneration Area, to reflect the changes underway in this area.

10.9.10

In **conclusion**, the plan is set to deliver on ambitious jobs growth targets through a focus on increasing the employment density at a range of existing employment sites. It has to be assumed that this will be to the benefit of the local and London-wide economy in the long term; however, there are some risks/uncertainties given that some industries will find it increasingly difficult to operate in Haringey. It is also important to note that targeted approaches are set to be put in place at Wood Green, Haringey Warehouse District and at locations around future Crossrail 2 stations, which will contribute to economic growth and diversification. Overall, **significant positive effects** are likely.

10.10

Skills and training

10.10.1

As things stand, there are no references to skills / training; however, it is understood that the emerging update to the **Infrastructure Delivery Plan (IDP)** will inform decisions (at the planning application stage) on the types of community uses required at particular sites. It is also important to note that skills and training is a focus of the adopted Strategic Policies (SP 9), DM Policies DPD and adopted Planning Obligations SPD (2014), with Chapter 7 encouraging use of planning obligations to deliver the facilities that will ensure the up-skilling of local residents so that they can better compete in the local jobs market. There is also a focus on ensuring employment, apprenticeships and work placements during the construction phase, with the level of development anticipated likely to create opportunities for these types of schemes.

10.10.2

In **conclusion**, whilst skills and training is not set to be a focus of the plan, this is broadly appropriate given the potential for opportunities to be realised through other plans.

10.11 Economic inclusion

- 10.11.1 There are specific issues in the **Haringey Warehouse District** that are set to be addressed through an overarching policy and a series of site allocations. The aim is to regulate warehouse living, thereby enabling enforcement action to be taken where necessary to avoid inappropriate instances of commercial floorspace becoming de facto residential use. The outcome should be a situation whereby occupants are ensured an appropriate standard of living; the existing creative industries and SME sectors are supported and given room to grow; and the employment offer of sites is maximised (including traditional industrial uses in some instances). Individual sites in this area should only come forward as part of a masterplan, given the bespoke issues involved at each site.
- 10.11.2 Also of note are the numerous instances of site specific policy requiring that: “Capped commercial rents will be expected in this area.” This requirement is set to apply to sites in Wood Green and Haringey Warehouse District in particular.
- 10.11.3 Finally, it is noted that there is at least one instance of site specific policy being established with a view to protecting an existing employment use. Specifically, SA 61: Barber Wilson is set to require that the presumption in favour of retention / conversion of historic industrial buildings on site, that house viable businesses. This approach reflects a consultation response received on this subject.
- 10.11.4 In **conclusion**, targeted approaches should be implemented that will ensure support for SMEs; however, there is little explicit consideration given to this subject (aside from signposting the DM policy on capped commercial rents). Also, it is important to note that there are some concerns about the potential for the economic growth strategy to marginalise some sectors (in particular, ‘traditional industries’), potentially with implications for those that rely on those sectors for employment.

10.12 Town centres

- 10.12.1 There are opportunities to enhance the function of **Wood Green** (the sole Metropolitan Town Centre in the Borough) through diversifying uses, which in practice means delivering a wide range of entertainment, leisure, and community facilities alongside new housing. The introduction of two new Crossrail 2 stations at Turnpike Lane and Alexandra Palace stations will stimulate investment and growth in the area. The construction of Crossrail 2 will require land to be safeguarded in the short term, but may also offer opportunities for redevelopment in the longer term. In particular, Turnpike Lane provides development potential to enhance the southern end of Wood Green High Rd. The Turnpike Lane end of Wood Green is personified by low height, large floorplate retail units, and this is considered to be inconsistent with Wood Green's status as a Metropolitan Town Centre with high public transport accessibility.
- 10.12.2 There are also considerable areas of developable land to the west of Wood Green, which leads to the potential for a new suburb (**‘Haringey Heartlands’**). This is a predominantly industrial area between Wood Green and the Great Northern rail line. The focus is the Clarendon Square site, where planning permission has been granted to redevelop redundant gas holders into new homes, and businesses centred on a new urban square. SA 22: Clarendon Square seeks to ensure that any opportunity to revisit the planning permission for the site seeks to maximise the role of Clarendon Square as a destination that complements Wood Green Metropolitan Town Centre.
- 10.12.3 It is also the case that the ongoing regeneration of Alexandra Palace will benefit Wood Green (and elsewhere in the Borough). There are opportunities for development of particular sites to enhance the connection between Wood Green and the Palace, both via Alexandra Palace station and Wood Green underground station, but also by foot through Haringey Heartlands.
- 10.12.4 The following are examples of site allocations geared towards ensuring the functioning of Wood Green / Haringey Heartlands:

- SA 11: Wood Green Library – The new urban square, including an entrance to a new library facility, will serve as the new civic heart of Wood Green.
- SA 12: The Mall – *“Greater open space for circulation should be created in order to make the middle section of the High Road a more pleasant place to visit.”*
- SA 14: 16-54 Wood Green High Rd – *“The standard of architecture and urban realm on the High Rd frontage should be of the highest order.”*
- SA 21: Clarendon Square Gateway – This site plays an important role in linking the Haringey Heartlands area to Wood Green High Rd. The future development will cross subsidise a safe pedestrian and cycling link from Wood Green to Alexandra Palace Park via the Heartlands area, and Cultural Quarter.

10.12.5 **Finsbury Park** is another important centre that is set to be enhanced through the Plan. New town centre frontages are proposed, alongside the allocation of Finsbury Park's District Centre status, thus complementing its existing designation in LB Islington. The site allocations alongside the guidance included in the Finsbury Park Town Centre SPD will guide development in this area. Finsbury Park Bowling Alley (SA 36) is a key site, where redevelopment will create an improved entrance to Finsbury Park from the station, a new leisure facility and an improved town centre offer. It is also notable that: “Development proposals must show how it impacts upon the Park, and improves its overall function and appearance.” SA 37: 18-20 Stroud Green Rd is the other site allocation that will contribute to the functioning of the centre.

10.12.6 Other notable centres are -

- Green Lanes – where a notable policy is set for Arena Retail Park (SA 29). Uses fronting onto Green Lanes redevelopment should provide town centre uses to extend the town centre south towards Hermitage Rd on the east side of the rd. This redevelopment should realign retail along Green Lanes, with this becoming a primary shopping frontage.
- Myddleton Road Local Centre (SA 57) – Policy will require: *“Diversification of uses, on Myddleton Road, enhancements to the urban realm, and improvements to local connections to encourage and increasingly viable and wider range of food and drinks establishments within the local centre”*. It is also understood that the level of transition from retail to food and drink will be closely monitored, and the findings used as a test case to inform future policy for other local centres in the borough.

10.12.7 In **conclusion**, a targeted approach is set to be implemented at Wood Green (including Haringey Heartlands) that should ensure that the function of this town centre is maintained and enhanced in the long term. A focus on residential development (high density in some instances) should ensure good potential for town centre uses and community infrastructure, and the policies for Wood Green / Haringey Heartland sites are set to put in place a framework to guide this (although some detail will be put in place only once the IDP is complete). A proactive approach is also being taken with respect to Finsbury Park. Overall **significant positive effects** are likely.

10.13 Biodiversity

10.13.1 Generally, development will avoid **important areas** (SINCs and areas identified as functioning as an ecological corridor). In the limited number of instances where development will (or may) impact on a sensitive site, policy will be put in place to ensure that targeted enhancements are also delivered (with a view to ensuring no net impact on biodiversity).

10.13.2 Detailed site specific policy is set to be put in place to ensure a targeted approach to **green infrastructure** delivery (i.e. realisation of the 'Green Grid' ambition). Generally access and biodiversity objectives can be delivered in support of one another, although there are instances where there is some tension.

- 10.13.3 The following examples of policy reflect the breadth of issues, and the breadth of measures being proposed through site allocations policy:
- In **Wood Green**, there is the opportunity to make a **green chain** linking Wood Green Common to the old rail line between Cumberland/Wolseley and Bradley/Barrett Rds, and Trinity Gardens. Accessibility benefits are set to be realised alongside biodiversity.
 - SA 16: Green Ridings House – *“This site can complete the green chain from Wood Green Common through to Trinity Gardens. Planning Obligations will be sought to improve the public space fronting the site, and enhance its ecological credentials.”*
 - SA 8: Station Rd Offices – *“Open space will be created on this site through the connection of a green chain linking Wood green Common through this site.”*
 - SA 10: Morrison's Wood Green – *“Existing semi-mature trees along the western and north-western boundary should be retained and protected in the development.”*
 - SA 25: Land adjacent to Coronation Sidings (Haringey Heartlands) – *“The site is currently part of an underperforming north-south ecological corridor running along the rail line. While **accepting that the quantum of corridor in this area will be reduced**, the impact of development will need to be identified and mitigated to ensure that the function of the corridor is protected through the development. At present the land is not considered to be positively contributing to the principles of the corridor, and any future development should ensure a positive contribution...”*
 - SA 27: Wightman Rd (South of the borough) – *“The site adjoins a north-south ecological corridor running along the rail line, and this should be **preserved and where possible enhanced** through the development... Open space will be provided to the rear, and should complement the ecological corridor running along the rail line.”*
 - SA 29: Arena Design Centre - Development should enhance the ecological corridor to the north of the site; and **edge treatment should complement the Gospel Oak-Barking rail line ecological corridor**, through a new green chain, linking the “slopes” behind Finsbury Park Avenue towards Finsbury Park.
 - SA 38: 460-470 Archway Rd (Highgate) – *“An ecological corridor runs along the northern edge of the site. While the site does not enter the ecological corridor itself, development will need to demonstrate that **no adverse impact, and/or suitable mitigation** is provided*
 - SA 43: Summersby Rd (Highgate) - *“**The impact on the Queen's Wood should be minimised**, potentially by ensuring that light from the site is directed downwards.... The impact of removing any trees on both this woodland and the wider SINC of Queen's Wood will need to be carefully considered.”*
 - SA 52: Pinkham Way (West of the borough) – The North London Waste Authority own part of the site, and have nominated it for waste related uses, whilst the Council's ambition is for employment uses on the site. There is a tension with the existing SINC designation, which will need to be addressed if the site is developed. Policy is set to state that: *“Before any development is granted planning permission, a **detailed Biodiversity Study** will be carried out to identify how the designated SINC can be enhanced by the development...”*
 - Other sites where biodiversity issues are briefly referenced include SA 28: *St. Ann's Hospital*; and SA 54: *Tunnel Gardens*.
- 10.13.4 In **conclusion**, it is clear that evidence-gathering work around biodiversity constraints and opportunities has fed through directly into policy. Not only does site specific policy look to conserve and enhance onsite and adjacent areas of biodiversity value, but it is also the case that policy reflects the need to ensure that areas are functionally linked as part of a borough-wide ecological network. **Significant positive effects** are predicted.

10.14 Townscape and cultural heritage

- 10.14.1 There is an inherent need in some instances to trade-off between, on the one hand, the need to deliver **tall buildings** to mark locations / develop 'place' or make development viable, and on the other hand the objective of conserving heritage / preserving valued townscape. The most sensitive locations tend to be the designated Conservation Areas and areas that contribute to long distance views and/or views to Alexandra Palace and other areas of open space.
- 10.14.2 The February 2015 version of the plan sought to apply a carefully targeted approach to tall buildings. However, public responses were greatly divided on this approach, with opposition (e.g. prescribed heights too low or too high) and differing views on the most suitable locations. In response, the Council has modified the preferred approach and is now to stop short of setting site specific building height guidelines. Rather, all development proposals will be assessed against the building heights policy in the Development Management Policies DPD.
- 10.14.3 **Wood Green** is a suitable location for taller buildings, which will mark the area as a location for people to visit, invest in, and navigate around, as set out in the Tall Building Validation Study (2015). Tall buildings will be appropriate in specific locations, marking either end of the town centre and/or a new connection towards Haringey Heartlands. Locations have been carefully considered through the Urban Characterisation Study to ensure views to and from Alexandra Palace and St. Michaels Church are protected. Areas potentially suitable for taller buildings are: Turnpike Lane, marking the new Crossrail station and the southern end of the shopping precinct; Wood Green underground station, marking the Piccadilly Line station and the northern end of the shopping precinct; Wood Green Library, signalling the connection between Wood Green and Haringey Heartlands, and a new urban realm and entertainment location; Penstock foot tunnel, signalling the connection between Haringey Heartlands/Wood Green area, and Alexandra Palace park.
- 10.14.4 Within **Wood Green**, a host of site specific policy measures are set to be put in place with the aim of mitigating negative effects on townscape/heritage. Examples are as follows -
- SA 5: LBH Civic Centre - The public realm to the front of the site will be improved to enhance the Trinity Gardens Conservation Area. Also, the setting of St. Michaels Church should be preserved in particular views from the High street, Trinity Gardens to the west, and to the east from Crescent Gardens. There is also a commitment to ensuring that the new residential block is built in 'a style that complements the modernist Civic Centre'.
 - SA 6: Green Ridings House - where development should "contribute positively to the Trinity Gardens Conservation Area."
 - SA 7: Wood Green Bus Garage - Heights will be restricted next to the properties on Ringslade Road. This will be achieved through the introduction of news-style development between the new green link, and these residential properties.
 - SA 10: Morrison's Wood Green - The Gaumont Cinema to the south of the site is Grade II* Listed, and the terraces adjacent on the High Road (nos. 1-19 incl. The Broadway) make a vital contribution to the setting of the Listed Building. Any development should consider the impact of the proposals on the setting and significance of these heritage assets.
 - SA 11: Wood Green Library - The former Coronet Cinema to the north of the site has listed status, and has an excellent interior, but the use as a boundary wall will be permitted so long as the historic fabric is not affected. Also, adequate sound and vibration mitigation measures must be incorporated, reflecting its desired reuse as a theatre, cinema or other cultural venue.
 - SA 13: Bury Rd Car Park - Development should complement the buildings in the Noel Park Estate Conservation Area. Heights should be restricted to four storeys along the interface, and have entrances that present onto the street.

- SA 14: 16-54 Wood Green High Rd - The Victorian shopping parade immediately north of the site on Wood Green should be retained and enhanced.
- SA20 (Wood Green Cultural Quarter East) - the Council considers that the Chocolate Factory building creates a positive active frontage well suited to being part of the future of the site while linking with the past, despite representations received highlighting concerns with the policy requirement to retain existing buildings.

10.14.5 It is also the case that mitigation has been strengthened since the February consultation in some cases, where the removal of reference to specific building heights leads to a risk to townscape/heritage. For example, at SA18 (Wood Green Cultural Quarter North) a guideline has been added that development on the site should make a positive contribution to the neighbouring conservation area.

10.14.6 **Elsewhere**, there are numerous examples of allocations aiming to ensure that townscape and heritage assets (Conservation Areas and Listed Buildings) are proactively conserved.

- SA 30-38: Harringey Warehouse District - there is some focus on maintaining the unique warehouse character of the area.
- SA 40: Former Highgate Rail Station & Gonnerman Antiques Site - seeks to ensure that the existing locally listed station building is retained, and brought into use. The existing platforms should be used as the basis for the enhancement to the site, to recognise the historical use of the site.
- SA 55: Alexandra Palace - will help to ensure that the regeneration of Alexandra Palace is continued in an appropriate manner to the existing historic building, given that the introduction of Crossrail to Alexandra Palace station, and also to New Southgate station, will lead to increased pressures. Detailed measures are set out in relation to the western part of the Palace, where development of restaurant and hotel uses will be supported.

10.14.7 It is also noted that for all sites that fall within a **Conservation Area** there is a policy stipulation that development should “preserve or enhance its appearance as per the statutory requirements”. Sites that fall within a Conservation Area are as follows –

- SA 5: LBH Civic Centre (Wood Green) falls within the Trinity Gardens Conservation Area
- SA 38: 460-470 Archway Rd; SA 45: Highgate Magistrates Court; SA 40: Former Highgate Rail Station & Gonnerman Antiques Site; SA 41: Highgate School; SA 43: Summersby Rd; and SA 44: Hillcrest all fall within the Highgate Conservation Area.
- SA 49: Cross Lane falls within the Hornsey Water Works & Filter Beds Conservation Area
- SA 55: Alexandra Palace falls within the Alexandra Palace Conservation Area
- SA 57: Myddleton Road Local Centre falls within the Bowes Park Conservation Area.
- SA 64: The Roundway - The prominent location attributes itself to an opportunity to create a visible architectural landmark, marking the entrance and setting of Bruce Castle. It could act as a ‘wayfinder’ for the heritage assets nearby. More generally, new development should be of high quality and enhance the setting of both the Conservation Areas and the grade I listed Bruce Castle, and should also contribute to the setting of Bruce Castle Park (a non-listed heritage and community asset).

10.14.8 In **conclusion**, whilst the intention is no longer to specify building heights through site specific policy, numerous policy measures are set to be put in place in order to ensure that potential impacts to Conservation Areas, other heritage assets and important views (e.g. to/from Alexandra Palace) are avoided, informed by the Urban Characterisation Study. Most if not all site allocations in Wood Green appear to reflect a desire to maintain and enhance the setting of heritage assets and ensure strategically important views, although there perhaps remains a risk that sites will impact in combination (here, and also possibly elsewhere). **Significant positive effects** are predicted, given a baseline situation whereby there is high probability of development schemes impacting in combination.

10.15 Open space

10.15.1 The Open Space Study 2014 identified areas of open space deficiency, taking into account both existing deficiency and deficiency set to arise in the future given projected population growth. There is difficulty in increasing the quantity of public open space in Haringey as this is an urban borough and the focus is therefore, primarily on the function, quality, usage and accessibility of existing public open space.

10.15.2 A solution is to apply a '**Green Grid**' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. A DM Policy is set to be adopted that will establish the overall strategy, and a number of site allocations will help to ensure that it is implemented. Across the borough, strategically important features within the Green Grid include Alexandra Palace Park (given its proximity to Wood Green), various areas of Metropolitan Open Land (MOL) and SINCS (where they are accessible). Another priority for the east of the borough is to open-up access to the Lee Valley regional Park.

10.15.3 The following sites are set to **contribute to the Green Grid**, or otherwise ensure easily accessible open space -

- SA 7: Wood Green Bus Garage - Open space will be created on this site through the connection of a green chain linking Wood green Common through this site.
- SA 11: Wood Green Library – The site will provide a civic open space / urban square.
- SA 17: North of Hornsey Rail Depot - Development should create improved and clearer access to the New River along the northern edge of the site.
- SA 19: Wood Green Cultural Quarter (south) - Coburg Rd may become part a predominantly cycle & pedestrian route linking Wood Green with Alexandra Palace and the west of the borough through the Penstock foot tunnel.
- SA 28 St. Ann's Hospital Site - New open space should be provided on the site which compliments the nearby Chestnuts Park, and in the area south of the rail line with Chestnuts/Downhills/Lordship parks
- SA 33: Vale/Eade Rd - Planning obligations to open up the south bank of the New River and institute a linear park should be explored through this development.
- SA 38: 460-470 Archway Rd - The opportunity for provision of a new entrance to Highgate Wood should be explored.
- SA 41: Highgate School - Exploration of how school facilities can be enhanced while simultaneously benefiting local communities including potentially increasing accessibility through the site. Open space should be made as accessible as possible.
- SA 42: Highgate Bowl – The aim is to achieve protection of the Highgate Bowl as open space, and improvement of public access through limited redevelopment of Townsend and Duke's Head yards. The entrances to the yard roads should signal the open space hidden behind, encouraging new users of the open space.

- SA52: Pinkham Way – if appropriate development may be required to improve access to the SINC.

10.15.4 In **conclusion**, it is clear that evidence-gathering work around issues and opportunities has fed through directly into policy. Recognising that there is little or no potential to increase the quantity of open space, efforts are focused on increasing the quality of open space, and access to open space. The plan is set to contribute to Green Grid objectives, and as such lead to benefits felt at a larger-than-local scale. **Significant positive effects** are predicted.

10.16 Water resources

10.16.1 Thames Water proposes to continue the Victorian Mains Replacement programme, and hence the following policy stipulation is made for many of the sites: *“Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.”* Previously (Feb 2015), the policy was set to go slightly further, stipulating that provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.

10.16.2 Water supply and demand management measures are primarily a matter for consideration at the London-scale, but it is noted that the Council has been consulting with Thames Water regarding the issue of water supply. It is understood there is no suggestion that the total quantum of development proposed cannot be accommodated within existing provisions, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey’s Infrastructure Delivery Plan.

10.16.3 In **conclusion**, there is little potential for the plan to impact significantly on the water resources baseline. London-wide and Haringey-specific development management policy will ensure that ‘sustainable drainage’ and water efficiency measures are implemented.

10.17 Soil and land quality

10.17.1 A number of site allocations are set to bring back into use underused brownfield land, remediating any ground **contamination** in the process. This is particularly the case in Haringey Heartlands. Clarendon Square (SA 22) – currently a vacant former gas works - is a prime example. Contamination is a wide-spread issue in the borough, which has led to the following policy stipulation being drafted for most sites: *“Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.”*

10.17.2 In **conclusion**, site specific policy will be put in place to make the best use of underused brownfield sites, and as such it is appropriate to conclude **significant positive effects**.

10.18 Flood risk and climate change

10.18.1 Opportunities to **de-culvert the River Moselle** are set to be explored. At a number of sites (e.g. SA 9: Mecca Bingo; and SA 61: Barber Wilson) investigations around possible deculverting should be facilitated through any development; whilst SA 11: Wood Green Library, SA 12: The Mall and SA 21: Clarendon Square Gateway are examples of policies that are set to go further. Here policy will state that: *“Any development in this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is explored. It may be possible that a deculverted river could be a focal point for the new urban square.”*

- 10.18.2 It is noted that at SA14: Mecca Bingo, the Environment Agency has suggested an eight metre buffer for development adjacent to Moselle Brook culverts, however this is not consistent with meeting the housing targets and hence the recommendation has not been implemented. The Council's view is that, due to the Growth Area location, an eight metre buffer would not be acceptable and a smaller buffer area should be negotiated.
- 10.18.3 Flood risk is an issue at s 52: Pinkham Way, where there is residual 1 in 100 year + Climate change flood risk from Bounds Green Brook to the north of the site. Policy is set to require that more vulnerable uses are kept from this part of the site in line with the sequential test.
- 10.18.4 In **conclusion**, necessary policy measures are set to be put in place to require the avoidance of development within flood risk areas (in-line with sequential test). It might also be expected that design-measures to mitigate risk should be a focus for some sites, although this does not seem to be the case with the current draft policies. Notably, a highly proactive approach is set to be implemented with regards to de-culverting / naturalising the River Moselle, which should lead to benefits not only in Haringey but also at other locations down-stream. On this basis **significant positive effects** are predicted.

10.19 Air quality

- 10.19.1 Air quality is a wide-spread issue in the borough, which has led to the following policy stipulation being drafted for most sites: *"Mitigation of and improvement to local air quality and noise pollution should be made on this site."* It is noted that this policy stipulation is not made for any sites in the west of the borough, reflecting the fact that air quality is less of a concern here.
- 10.19.2 In **conclusion**, it is not clear that site specific measures can be implemented to directly address air quality issues, given that poor air quality is widespread across the borough; however, this should be the focus of further investigation.

10.20 Noise

- 10.20.1 **Noise pollution** is a wide-spread issue in the borough, which has led to the following policy stipulation being drafted for most sites: *"Mitigation of and improvement to local air quality and noise pollution should be made on this site."* It is noted that this policy stipulation is not made for sites in the east of the borough, reflecting the fact that noise is less of a concern here and that emerging DM Policies can appropriately address this matter
- 10.20.2 Noise is a particular issue for some **sites that border a rail line**, and where this is the case specific policy measures are set to be put in place -
- SA 23: Clarendon Rd South - Close attention in the design of this site should be had to the impact of the railway embankment on future occupants of the site.
 - SA 27: Wightman Rd - The design of new buildings on this site should have regard to the noise from road and rail links nearby.
 - SA 37: 18-20 Stroud Green Rd - A new communal courtyard should be created, with development providing a buffer from the noise on Stroud Green Rd and the rail line.
- 10.20.3 In **conclusion**, a targeted approach is set to be implemented that should ensure sites adjacent to railway lines are delivered in such a way that noise pollution issues are avoided or mitigated, e.g. through attenuation measures or layout measures that separate sensitive receptors from the noise source. There may be opportunities to go further through policy, i.e. identify other sites where noise may be an issue and put in place policy accordingly.

10.21 Energy and carbon

- 10.21.1 There are widespread opportunities around **decentralised energy**, which is a subject of **ongoing work** with a view to developing a masterplan and establishing which sites should play a role in creating a local network. To date, opportunity areas have been established, and where a site falls into one of these areas then the following policy stipulation is set to be made: *"This site is identified as being in an area with potential for being part of a de-centralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network."* It is noted that this policy stipulation is made for all sites in Wood Green, but none of the sites in Highgate or the west of the borough, owing to the key priorities areas established for implementing networks in the Council's emerging DE Masterplan. The DM Policies DPD will set further requirements in this regard, and other sites across the west of the Borough may, over the plan period, be required to support objectives in this regard.
- 10.21.2 In **conclusion**, there are considerable opportunities around implementing decentralised energy networks, and it is vital that emerging understanding of these opportunities continues to feed-in at the planning application stage.

10.22 Waste management

- 10.22.1 A number of Safeguarded Waste Sites will continue to be **safeguarded** for waste until alternative provision has been made. With regards to **Pinkham Way** (SA 52), which is not a Safeguarded Waste Site, the North London Waste Authority own part of the site, and have nominated it for waste related uses. There is a tension with the existing SINC designation, which will need to be addressed if the site is developed.
- 10.22.2 In **conclusion**, the need to cooperate closely with the North London Waste Authority has been highlighted. The emerging North London Waste Plan will deliver on objectives around ensuring sufficient local capacity for waste management.

10.23 Sustainable transport

- 10.23.1 Issues around '**accessibility**' have already been discussed above (under the 'accessibility' heading; under the 'economic growth' heading where the council's approach of increasing the number of jobs on sites with a high PTAL rating is explained; and under the 'biodiversity' heading, where the 'Green Grid' approach is discussed). Additional issues are discussed here, with a view to demonstrating that the objective of encouraging walking, cycling and use of public transport is a major focus of the Plan.
- 10.23.2 Wood Green is notable for having very good access to public transport services. As such, the following policy stipulation around **parking** is set to be made for all sites (with the exception of SA 12: The Mall): *"Parking should be minimised on this site due to the excellent local public transport connections."* This policy stipulation is also set to be made for one site in the south of the borough (SA 27: Wightman Rd), and at another (SA 29: Arena Retail Park) policy is set to state that: *"Parking should be managed down on this site due to the excellent local public transport connections. The parking requirements of the retail in the new scheme should be considered however."*
- 10.23.3 A range of other site specific policy measures are set to be put in place, including:
- SA 22: Clarendon Square - Provide optimised **north south link** through the site improving the link to the future Alexandra Palace Crossrail station
 - SA 10: Morrison's Wood Green - A new **pedestrian route** should be created through the site.
 - SA 11: Wood Green Library - This site must provide an attractive, safe and generous east west pedestrian and cycling connection linking into the wider **cycle network**; and, in

addition to the main east-west route, a pedestrian loop towards Station Road should be facilitated through the site.

- SA 16: Turnpike Lane Triangle - Could form an important **node on the local cycle network**, network by enabling a connection from Frome Rd through the bus station and Ducketts Common towards Hornsey and the West of the Borough. The ground floor of the Westbury Avenue frontage of the building could be a suitable location for a secure cycle storage facility linked to Turnpike Lane station.
- SA 17: North of Hornsey Rail Depot - Mixed use residential and employment will secure improved **pedestrian and cycling link to Hornsey rail station** and the west of the borough, and improvements to the New River Path.
- SA 19: Wood Green Cultural Quarter (south) - Development contributions for a dedicated cycle and pedestrian **crossing of Western Rd into the Penstock Tunnel** should be secured through development on this site.
- SA 24: NW of Clarendon Square - Development contributions for a dedicated cycle and pedestrian **crossing of Western Rd** into an enhanced Penstock Tunnel should be secured through development on this site.
- SA 27: Wightman Rd - This development should help to fund an improvement to the **bridge at Harringay station**, to improve east-west connections. Measures to **reduce the gradient** of the bridge into Burgoyne Rd should particularly be considered.
- SA 29: Arena Retail Park - The potential to connect the Harringay Warehouse District more directly to Harringay Green Lanes station should be explored by creating a new pedestrian link.
- SA 52: Pinkham Way - **Connectivity to New Southgate station**, which Crossrail 2 is proposed to be connected to, should be optimised.
- SA 61: Barber Wilson - Residential development will be permitted on this site to enable creation of **a new pedestrian and cycle route**.
- SA 64: The Roundway - Consolidation of the site for employment-led mixed use development with residential will enable an improved east-west cycling connection.

10.23.4 It is also important to bear in mind that site specific measures will not be implemented 'in a vacuum'. TfL are expected to invest in cycling through a range of measures such as the proposed cycle superhighway through Tottenham and Quietways cycle routes. Other investment to promote cycling being led by the Borough includes cycle training, local cycle routes and cycle parking.

10.23.5 In **conclusion**, it is clear that a policy priority is to ensure high density residential and employment development where there is the highest PTAL, and furthermore a carefully targeted approach is set to ensure that sites contribute to borough-wide walking and cycling networks. **Significant positive effects** are predicted.

10.24 Overall conclusions

- 10.24.1 Significant positive effects are predicted in terms of the majority of the 21 sustainability topics that have provided a framework for the appraisal. In each instance, the appraisal finds that a carefully targeted approach to site specific policy is emerging that recognises the need for individual sites to contribute to wider objectives, whether borough-wide objectives (e.g. around walking/cycling, accessibility and biodiversity) or sub-area specific objectives (notably objectives for Wood Green, Haringey Heartlands and the Haringey Warehouse District).
- 10.24.2 Under some topic headings, whilst significant positive effects are predicted overall, the appraisal also serves to identify potential draw-backs / risks or the potential for policy to 'go further'. Most notably, with regards to economic growth and economic inclusion, whilst the effect of the plan will be to support economic growth and diversification, there are drawbacks given that some industries will find it increasingly difficult to operate in Haringey. Also:
- Whilst significant positive effects are predicted in terms of 'crime' overall, further opportunities to design-out crime should be explored;
 - Whilst significant positive effects are predicted in terms of 'health' overall, emerging evidence around requirements for health facilities should be taken into account;
 - Whilst significant positive effects are predicted in terms of 'housing' overall, emerging evidence around Gypsy and Traveller accommodation needs should be taken into account;
 - Whilst significant positive effects are predicted in terms of 'townscape and heritage' overall, there will be a need to take careful account of the potential for tall buildings to impact, including through in--combination impacts; and
 - Whilst significant positive effects are predicted in terms of 'flood risk' overall, further consideration might be given to policy measures aimed at avoiding and mitigating risk.
- 10.24.3 There are no instances of the appraisal concluding significant negative effects for a sustainability topic; however, there are number of instances where it is not possible to conclude significant positive effects. In several instances it is the case that policy requirements are broad at this stage, in the knowledge that these issues can be sufficiently addressed at the planning application stage and appropriately managed through the Borough-wide DM Policies DPD. Most notably, it is not possible to conclude significant positive effects in terms of 'accessibility' at the current time, given that the Infrastructure Delivery Plan (IDP) update is yet to be finalised and feed into site specific policy requirements around community infrastructure delivery; nor is it possible to conclude predict significant positive effects in terms of 'energy and carbon' as there is still much work to be done in order to ensure that opportunities for delivering decentralised energy networks are realised.

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 Pre-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'. In-light of appraisal findings (i.e. predicted effects and uncertainties) presented in Part 2 above, monitoring efforts might focus on:
- The shift in employment types within localities;
 - Gypsy and Traveller accommodation needs;
 - Building heights in the vicinity of heritage assets;
 - The length of the Moselle river that is culverted;
 - The way in which schemes seek to contribute to / make use of decentralised energy.

APPENDIX I - REGULATORY REQUIREMENTS (1)

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

Schedule 2

Interpretation of Schedule 2

The report must include...

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the SA Report]
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	The likely significant effects associated with alternatives, including on issues such as...	
(c) the environmental characteristics of areas likely to be significantly affected;	... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i> [Part 2 of the SA Report]
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(i) a description of the measures envisaged concerning monitoring.	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
	Environmental characteristics of areas likely to be significantly affected	
	Key environmental problems / issues and objectives that should be a particular focus of appraisal	

APPENDIX II - REGULATORY REQUIREMENTS (2)

Appendix I signposts to broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met.

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 4 ('What's the scope of the SA'). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 5 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix III. With regards to explaining 'how... considerations have been taken into account' - - Chapter 6 ('Reasons for selecting the alternatives dealt with') explains how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015. - Chapter 8 ('Reasons for selecting/developing the preferred approach') explains the how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. - Chapter 10 ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in Feb 2015.

f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	- Chapter 7 ('Alternatives appraisal findings') presents the appraisal of reasonable alternatives. - Chapter 10 ('Appraisal of the draft plan') presents the appraisal of the draft plan. As explained within the various methodology sections, as part of appraisal work consideration has been given to the established SA scope, and the need to consider the potential to various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The Feb 2015 'appraisal of the draft plan' (Chapter 14 within the Interim SA Report) made a number of recommendations, and subsequently these were taken on-board by the Council when finalising the plan for publication/submission. At the current time, Chapter 10 ('Appraisal of the draft plan') concludes by highlighting a number of ways in which the plan might 'go further' in order to more fully address specific sustainability considerations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapter 6 deals with 'Reasons for selecting the alternatives dealt with'. Also, Chapter 8 presents 'Reasons for selecting/developing the preferred approach'. Methodology/limitations are discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives as appropriate.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 13 presents 'measures envisaged concerning monitoring'.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	An Interim SA Report, which essentially presented all the information required of the SA Report, was published for public consultation alongside the draft plan in February 2015, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the pre-submission plan, under Regulation 19, so that representations might be made ahead of submission.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Report (Feb 2015), alongside consultation responses received, when finalising the plan for publication/submission. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when considering the plan at Examination (i.e. taken into account by the Planning Inspector, when considering the plan's soundness, and the need for any modifications).

APPENDIX III - CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of sustainability objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal work under the SA framework.

What's the sustainability context?

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.

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.

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 2008¹³. 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.

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.

What's the sustainability baseline?

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.
- There is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation.
- Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery
- There is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence

¹³ 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.

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 not particularly high, but there are localised issues. In Tottenham Hale 22.45% of residents aged 16 and over have 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.
- Although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment.
- As a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers. This issue has a greater impact on children from Black and other ethnic minority groups and children who are eligible for free school meals. Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small.
- Post-16 attainment in Haringey is improving but opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education.

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.
- Health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children.
- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).
- There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas.
- The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years to ensure essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives.
- Environmental issues are more concentrated in certain parts of the borough. For example, town centres are a particular focus for highway congestion and poor air quality. Some issues also impact more heavily in more deprived parts of the borough, with higher accident casualty rates in the East of the borough.

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.
- Housing need is high amongst certain groups of residents including those with the protected characteristics. For example, levels of homelessness are high amongst female lone parents.
- Homelessness is also high in the age group 16-24 and 25-44 compared to the expected profile from census data.
- Homelessness data indicates Black households approach as homeless at a level which is more than twice their representation in Haringey's population.
- Some protected groups also have high levels of housing need due to higher levels of vulnerability. Homeless acceptance due to mental or physical disability is higher than would be expected given the profile of disability in the 2011 census, indicating that disability may be a factor in causing homelessness for these groups of households.
- The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services.

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.
- Compared to London, Haringey has a similar proportion of 0-19 year olds, a higher working age population and a lower proportion of older people. Those aged 25-29 and 30-34 form the two largest groups in the borough.
- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and around 200 languages are spoken. Our population is the fifth most ethnically diverse in the country.

- Historically, Haringey has experienced a high level of population turnover. Most population turnover occurs by people moving into and out of other parts of the UK.

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.
- Improved access to services and facilities is key to ensuring equality of opportunity. Certain groups may suffer particularly from reduced activity, for example those less able to travel due to mobility issues or low income.
- Analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough. For example, the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area.
- Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands

Economic growth

- When 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.
- 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 roles¹⁴ (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.
- Labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities.

¹⁴ 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.

- There is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park. Unemployment and the proportion of young people who are NEET (Not in education employment or training) is higher in the east of the borough.

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
- 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.

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 (some of which have had Character Appraisals¹⁵ completed), two Registered Parks and Gardens (Finsbury Park and Alexandra Park), 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. Also, 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.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.

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. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land, and 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.

¹⁵ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

- 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.
- Open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough.

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 Moselle Brook and Stonebridge Brook is heavily modified. These Brooks are both tributaries of the Lower Lee River, classified as having '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 GLA¹⁶ estimate that buildings cover 24,000 hectares or 16% 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 have 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 level¹⁷ 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.

¹⁶ 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)

¹⁷ 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)

- 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. 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.
- 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.

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

As explained within Chapter 4 (What's the scope of the SA?), the SA process undertaken for the Haringey Local Plan has sought to integrate EqIA and HIA. Relevant issues have been considered through scoping work (i.e. through context and baseline review - see Appendix III; and establishment of the SA framework - see Chapter 4) and have fed into the appraisal of alternatives (see 'Part 1') and the appraisal of the draft plan (see 'Part 2'). The aim of this appendix is to summarise and 'signpost'.

- Community cohesion is an important broad issue, recognising that: almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with around 200 languages are spoken; and historically, Haringey has experienced a high level of population turnover. However, the Site Allocations DPD has relatively little effect in this regard, with the other plans set to have greater effects through policy on housing mix. Perhaps the most notable effects will result from the clear focus on delivering enhancements to the open space through the Site Allocations DPD. Other matters discussed under the community cohesion heading, as part of the appraisal of the draft plan ('Part 2' above), include efforts targeted at those who seek warehouse living.
- Health is an important broad issue, recognising that: health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years); there is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. Perhaps the most notable effects of the Site Allocations DPD relates to design of the urban realm and support for walking/cycling infrastructure, as discussed under the health, accessibility and sustainable transport headings within the appraisal of the draft plan ('Part 2' above).
- Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals); Children from Gypsy Roma and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small; and whilst post-16 attainment in Haringey is improving, opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. However, the Site Allocations DPD has relatively little effect in this regard, as discussed under the 'education' heading within the appraisal of the draft plan ('Part 2' above).
- Crime is an important broad issue, recognising that: there is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation; young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery; and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence. As discussed under the 'crime' heading, as part of the appraisal of the draft plan ('Part 2' above), site specific policy is set to ensure that opportunities to design-out crime at certain sites are realised; however, the appraisal concludes that the plan might go further.
- Housing is an important broad issue, recognising that: housing need is high amongst certain groups of residents including those with the protected characteristics, e.g. levels of homelessness are high amongst female lone parents; black households approach as homeless at a level which is more than twice their representation in Haringey's population; some protected groups also have high levels of housing need due to higher levels of vulnerability, with homeless acceptance due to mental or physical disability higher than would be expected given the profile of disability in the 2011 census. The rate

and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services; however, the Site Allocations DPD has relatively little effect in this regard, with the other plans set to have greater effects through policy on Estate Renewal and housing mix. As discussed under the 'housing' heading, as part of the appraisal of the draft plan ('Part 2' above), there are relatively few examples of site specific policy set to prescribe the nature of the housing mix.

- Economic inclusion is an important broad issue, recognising that: labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics, e.g. the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities; and there is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. This is an important issue set to be addressed through all four plans, including the Site Allocations DPD, recognising the support for redevelopment of some existing employment areas. Employment density will be increased in the vast majority of cases, and will be significantly increased overall (i.e. across the borough); however, the nature of jobs available within the borough is set to shift, and there is a risk of disproportionate effects. It is noted that there is not set to be an explicit focus on skills and training, although it is recognised that planning has a limited role to play in meeting objectives in this respect.
- Environmental quality is an important broad issue, recognising that: the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with the protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality); environmental issues are more concentrated in certain parts of the borough, e.g. town centres are a particular focus for highway congestion and poor air quality, and there being higher accident casualty rates in the relatively deprived east of the borough; and open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough. Site specific policy is set to generic references (essentially signposts to DM policy) to the need to address air quality, noise and contamination issues, in areas where these issues are likely to arise. Notably, site specific policy is established at several sites adjacent to rail lines, in order to ensure noise mitigation.
- Accessibility is an important broad issue, recognising that: improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income); analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough, e.g. the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area. Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands, however, this is only set to be addressed through the plans at the current time to a limited extent, as work on the Infrastructure Delivery Plan (IDP) is still on-going, and it is through this plan that provision will primarily be made. Having said this, it is suggested that the Site Allocations DPD does perform well, as discussed under the 'accessibility' heading above (and other headings), given the considerable focus on enhancements to movement / permeability.

APPENDIX V - OFFICE USES IN WOOD GREEN

Introduction

Chapter 7 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for 'Office uses in Wood Green':

- **Option 1** – Reduction in office uses, despite high accessibility (PTAL)
- **Option 2** – Promotion of office uses prevalent, commensurate with high PTAL

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

For each of the options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework.

Red shading is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Effects are predicted taking into account the criteria presented within Regulations.¹⁸ So, for example, account is taken of the duration, frequency and reversibility of effects. **Cumulative effects** are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity that is outside the control of the Site Allocations DPD).

Finally, it is important to emphasise that the approach taken strikes a balance between the desire to ensure rigorous and systematic analysis on the one hand, and ensure **conciseness / accessibility** on the other. Where an issue, or an effect characteristic, is not referenced, the implication is that there is no point to be made that warrants a mention, given the desire to be concise. That is not to say that the issue/characteristic has been entirely overlooked as part of appraisal. Similarly, the 'significance' of effects is only discussed in instances where a clear conclusion can be reached (or there is some uncertainty). In instances where significant effects are not predicted, then significance is not discussed.

¹⁸ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Option 1 should support a targeted approach to regeneration in Wood Green, leading to a situation whereby the town centre is vibrant '24/7', with positive implications for the achievement of crime objectives.		2
Education	No notable implications.		
Health	No notable implications.		
Housing	Wood Green is an appropriate location for new homes, and therefore Option 1 performs relatively well.		2
Community Cohesion	Option 1 should support a targeted approach to regeneration in Wood Green, leading to a situation whereby the town centre is vibrant and well used by a cross-section of the community. Significant effects are possible, but unlikely.		2
Accessibility	Wood Green is highly accessible by public transport, and this situation is set to improve further given Crossrail 2. High PTAL means that town centre uses and community facilities should be encouraged with a view to ensuring good 'accessibility' for all members of surrounding communities, including the less mobile. There is likely to be the greatest opportunities to support town centre uses and community facilities under Option 1. Significant effects are possible, but unlikely.		2
Economic Growth	The London Plan establishes that Wood Green is not a preferred location for office growth, and it is expected that development of Wood Green as a functioning and vibrant Town Centre with a clear civic role – through delivery of new homes and town centre uses (Option 1) – will support borough wide and sub-regional economic objectives in the long term. It is also the case that there is low market demand for office space in Wood Green. Significant effects are possible, but unlikely.		2
Skills and Training	No notable implications.		
Economic Inclusion	It might be that new office space in Wood Green (Option 2) would lead to less need to increase the jobs density at existing employment sites (i.e. convert traditional employment floorspace into office space) with the effect that there is more potential for traditional employment sectors to thrive locally. However, this effect is highly uncertain. It is also important to note that, under Option 1, whilst Wood Green would not be a focus of office uses, there could (would) still be the potential for targeted measures to be taken to ensure delivery of employment space that is suitable for SMEs (affordable, flexible, etc.).	=	=
Town Centres	There are opportunities to enhance the function of Wood Green (the sole Metropolitan Town Centre in the Borough) through diversifying uses, which in practice means delivering a wide range of entertainment, leisure, and community facilities alongside new housing. Option 1 should support a targeted approach to regeneration in Wood Green, leading to a situation whereby the town centre can thrive and develop an offer that is distinct within the wider sub-region. Significant positive effects are predicted under Option 1. There is no reason to suggest that Option 2 would lead to significant negative effects, however.		2

Topic	Discussion	Opt 1	Opt 2
Biodiversity	There are biodiversity related opportunities locally, and it might be the case that Option 1 will lead to more funds being made available to support conservation/ enhancement measures; however, this is uncertain and effects would be fairly negligible.		
Townscape and Cultural Heritage	Option 1 is best performing, on the assumption that increased footfall (and town centre 'vibrancy', more generally) is a positive from a heritage conservation perspective. There are issues around building heights in Wood Green, given important views not least to and from Alexandra Palace, but it is not clear that either option leads to implications.	★ 1	2
Open Space; Water Resources; Soil and Land Quality; Flood Risk and Climate Change; Air Quality; Noise; Energy and Carbon; and Waste Management: No notable implications.			
Sustainable Transport	It is generally accepted that offices - as locations where a large number of people will commute to and from – should be located in areas with high public transport accessibility. Option 1 is therefore preferable, although it is not clear that there would be significant effects, given that the baseline situation is one whereby there are many other highly accessible locations for office development in the borough.	2	★ 1
<u>Summary</u> Option 1 (Reduction in office uses) performs best in terms of a range of sustainability objectives, stemming from the suggestion that this approach will support a targeted approach to regeneration in Wood Green, leading to a diversification of uses and a situation whereby the town centre is vibrant and has a clear role to play sub-regionally. It is not thought that a decision to reduce office space in Wood Green will have negative implications from an economic growth perspective, given that there are a number of other areas locally where demand for offices is high, and the effect of regeneration in Wood Green should be to enhance the image of Haringey in general as a place to do business and invest. The draw-back to Option 1 relates to 'sustainable transport' objectives; however, there are other locations with high PTAL that are set to be a focus of office development.			

APPENDIX VI - HARINGEY WAREHOUSE DISTRICT

Introduction

Chapter 7 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for 'Haringey Warehouse District':

- **Option 1** – Allow a mix of uses including residential
- **Option 2** – Maintain as employment, reflecting employment designation

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Employment sites that are underused may attract crime and anti-social behaviour, which would suggest that opportunities should be taken to allow a mix of uses in some instances (Option 1).	★1	2
Education	No notable implications.		
Health	The current situation is one whereby there are issues around unauthorised warehouse living and poor living environments. It can be assumed that this situation would continue and worsen under Option 2, leading to significant negative effects.	★1	2
Housing	Under Option 1, non-conventional residential development ('warehouse living') will address a specific demand, and so is a positive in terms of housing objectives.	★1	2
Community Cohesion	Local residents have identified positives associated with having a creative community living nearby, and there are opportunities to capitalise on this under Option 1.	★1	2
Accessibility	PTAL is generally poor in this area, although it is not clear that there will be any notable implications. This reflects an assumption that residents will tend to be young and healthy adults.		
Economic Growth	Option 1 will support the creative industries and therefore likely lead to a diversification in the local economy of Haringey, albeit there will be some loss of traditional industries. It is assumed that, under Option 1, there would be no-net-loss of employment floorspace, and an increase in jobs density. Significant effects for the local economy of Haringey are possible, but uncertain.	★1	2
Skills and Training	It is anticipated that a creative hub will develop under Option 1, which could lead to opportunities around skills and training.	★1	2
Economic Inclusion	Option 1 will lead to a situation whereby the existing creative industries and SME sectors are supported and given room to grow; and the employment offer of sites is maximised. The net effect for traditional industrial uses would likely be negative; however, it is understood that there would be some instances under Option 1 where traditional industries can be supported.	?	?
Town Centres; Biodiversity; Townscape and Cultural Heritage; Open Space; Water Resources; Soil and			

Topic	Discussion	Opt 1	Opt 2
Land Quality; Flood Risk and Climate Change; Air Quality; Noise; Energy and Carbon; and Waste Management: No notable implications.			
Sustainable Transport	PTAL is relatively low for much of the Haringey Warehouse District, which would suggest that these sites are not suitable for intensification.	2	
<u>Summary</u> Option 1 (Allow a mix of uses including residential, despite employment designation) is likely to lead to widespread benefits given existing issues around unauthorised warehouse living (not least around poor living environments) and the fact that supporting the creative sector is an important economic objective for Haringey. There are potentially some draw-backs – including those that relate to the loss of floorspace for traditional industries – but it is anticipated that policy measures can be put in place to mitigate effects.			

APPENDIX VII - OPEN SPACE

Introduction

Chapter 9 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for 'Open space':

- Option 1 – Do not allocate sites for purely open space
- Option 2 – See to allocate sites for purely open space

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Option 1 might lead to increased funds being made available for enhancements to existing open space, which will enable existing issues around crime / anti-social behaviour to be addressed.	★1	2
Education	No notable implications.		
Health	There are areas of open space deficiency locally, and either option could help to ensure that issues are addressed.	=	
Housing	Option 2 would certainly constrain the ability to deliver on the ambitious London Plan housing targets. Significant negative effects are predicted.	★1	2
Community Cohesion	No notable implications.		
Accessibility	Option 1 will enable efforts to be focused on increasing the role that existing open space can play in terms of connectivity. Significant positive effects are predicted.	★1	2
Economic Growth	Option 2 would certainly constrain the ability to deliver on the ambitious London Plan employment targets. Significant negative effects are predicted.	★1	2
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	No notable implications.		
Biodiversity	Either option could support target enhancements to local ecological networks, although it might be suggested that new open space would likely be geared towards recreational uses, as opposed to biodiversity.	=	
Townscape and Cultural Heritage	Either option could support target enhancements to open space that enhance views and the setting of heritage assets. There could be particular opportunities under Option 2 (new open space).	=	

Topic	Discussion	Opt 1	Opt 2
Open Space	The Open Space Study 2014 identified areas of open space deficiency, taking into account both existing deficiency and deficiency set to arise in the future given projected population growth. There is difficulty in increasing the quantity of public open space in Haringey as this is an urban borough, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. A Green Grid approach can ensure that the functional role of key assets within the network (e.g. Alexandra Palace Park, various areas of Metropolitan Open Land and SINCS) is enhanced. Option 1 has the potential to lead to significant positive effects, as does Option 2 (on the assumption that this approach would be deliverable).	=	
Water Resources	Either option could help to ensure that waterways are appropriately buffered, although it is likely that a Green Grid approach (Option 1) would lead to more widespread benefits.	★1	2
Soil and Land Quality	Either option could help to ensure that a targeted approach is taken to dealing with land that is contaminated; however, it is not clear that this would be a focus of policy in practice.		
Flood Risk and Climate Change	Either option could help to ensure that waterways are appropriately buffered, although it is likely that a Green Grid approach (Option 1) would lead to more widespread benefits.	★1	2
Air Quality	Either option could help to ensure that open space is used to buffer major roads, and polluting industry.	=	
Noise	As above.	=	
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	Either option could help to encourage open space to be used for walking and cycling, but it is expected that (Option 1) would lead to more widespread benefits, with significant positive effects predicted.	★1	2
Summary There is difficulty in increasing the quantity of public open space in Haringey, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. Benefits of a Green Grid approach will be wide-spread, and hence 'significant positive effects' are predicted under a number of topic headings, most notably 'transport' and 'accessibility'.			



Sustainability Appraisal (SA) of the Tottenham AAP

SA Report

Published alongside the pre-submission version of the plan

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1	Nov 2015	SA Report published alongside the pre-submission version of the Tottenham Area Action Plan	Mark Fessey, Principal Consultant	Steve Smith, Technical director	Steve Smith, Technical director

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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' issues¹), 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 **Table 2.1** explains more about the regulatory basis for answering these 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 other 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)

Table 2.1: Questions answered by this SA Report, in-line with Regulatory⁵ requirements

PRIMARY QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What has plan-making / SEA involved up to this point? [See Part 1 , below]		- Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach) - The likely significant effects associated with alternatives - Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SEA findings at this current stage? [See Part 2 , below]		- The likely significant effects associated with the draft plan - The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next? [See Part 3 , below]		A description of the monitoring measures envisaged
OTHER QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What's the plan seeking to achieve?		An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What's the scope of the SEA?	What's the sustainability 'context'?	- Relevant environmental protection objectives, established at international or national level - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What's the sustainability 'baseline'?	- Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan - The environmental characteristics of areas likely to be significantly affected - Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment

N.B. The right-hand column of Table 2.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

Also, **Appendix II** presents supplementary information (in the form of a checklist) to explain how/where regulatory requirements are met within this report.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

- 3.1.1 The Area Action Plan (AAP) is being prepared in order to ensure that the scale of development and change proposed for Tottenham through 2026 and beyond is positively managed and guided by a planning framework. It aims to ensure that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it.
- 3.1.2 The boundary of the AAP (see Figure 1.0) has been drawn to include the key neighbourhoods that have the capacity to accommodate growth i.e. those with developable strategic brownfield sites, existing transport connections, and maximise the benefits that come from regeneration. It recognises that sites identified sit within and alongside other sites and neighbourhoods that are not intended to be subject to the same level of change but will benefit from the targeted regeneration and proposals to improve physical connections, transport accessibility, employment creation and enhanced social infrastructure.
- 3.1.3 An AAP will provide clarity and certainty about how the opportunities for improving Tottenham's places will be realised, and the challenges addressed. Specifically, it will: prescribe a vision for how neighbourhoods areas can develop, allocate strategic sites for particular uses and types of development, and set out Tottenham specific policies aimed at ensuring new development is ambitious, appropriate and sustainable in a Tottenham context. It will alert infrastructure providers and public sector agencies to the growth targets and existing deficiencies present, so that they may schedule service and capacity upgrades accordingly. The Council's Infrastructure Delivery Plan will be used in conjunction with the AAP for this purpose.
- 3.1.4 More specifically, the objective of the Tottenham AAP is to help deliver:
- World class education and training
 - A prosperous hub for business and local employment
 - High quality public realm
 - A different kind of housing market
 - A fully connected place with even better transport links
 - A strong and healthy community
 - Enhancement of heritage assets

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. 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). 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.⁶
- 4.1.3 As such, an SA Scoping Report was published for consultation in January 2014.⁷ 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.

⁶ 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.'*

⁷ 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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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 <i>Will the policy approach under consideration help to...</i>
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?

4.3 A note on 'equalities' and 'health' considerations

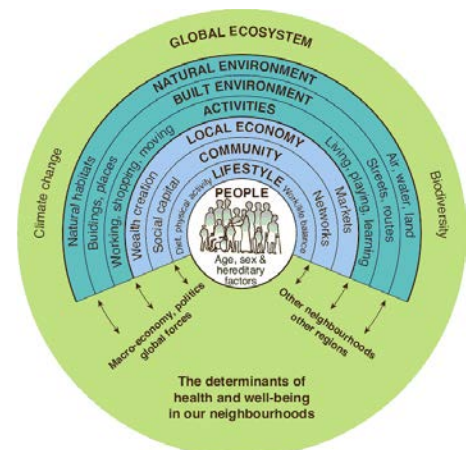
4.3.1 Equality and health considerations were a focus of SA scoping work. As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence the SA process 'integrates' Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). **Appendix IV** signposts to areas within this report where EqIA and HIA has 'fed-in'.

Box 4.1: EqIA and HIA

The Council has 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**, 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.

Determinants of health and wellbeing in our neighbourhoods, from Barton & Grant (2006)



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:

- The spatial strategy for Tottenham
- Building heights / tall building clusters
- Employment sites
- Affordable housing
- The town centre hierarchy

5.1.2 Systematic appraisal of (and consultation on) reasonable alternatives, in relation to these topics, is helpful as it equates to proactive plan-making, and is a means of ensuring that the final policy approach is sufficiently justified.

Reasons for focusing on these policy areas

5.1.3 These are the same issues that were the focus of alternatives appraisal within the Interim SA Report of February 2015, with the exception that 'Green Link' has been removed from the list. The Council received a number of consultation responses on the proposed Green Link, and in light of these has now determined a need to establish a policy focused on promoting the concept of the Green Grid through the plan (giving consideration to links through Tottenham to the Lee Valley). As such, there is no longer the same need to formally consider alternatives.

5.1.4 The five topics that are currently a focus of attention all offer an opportunity to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Haringey's spatial strategy. It is not the case that the preferred policy approach in relation to any of the topics previously examined in February 2015 is now 'set in stone' to such an extent that it is no longer helpful to dwell on alternatives, nor is it the case that any further topics have emerged since February 2015 as necessitating alternatives appraisal.⁸ Other policy topics besides those listed above could *potentially* 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). 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 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.

⁸ Having said that no new issues have emerged as necessitating alternatives appraisal, it is recognised that a number of new policies have emerged and the Council has recognised the need to change emphasis in respect of several other policy areas. A number of new policy areas are set to be addressed through the plan with a view to repeating principles of relevant borough-wide DM policy, and adding a degree of local specificity. Other new policy areas deal with implementation. Also, 'Neighbourhood Area' policies are now being developed to provide context to the area-based site allocations in the AAP, with an emphasis on setting out principles for town centre uses / development in the neighbourhood areas.

Structure of this part of the SA Report

- 5.1.5 Each of the five 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?

- 5.1.6 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?

- 5.1.7 In addition to alternatives appraisal, development of the draft (pre-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 current draft plan.

6 SPATIAL STRATEGY

6.1 Introduction

6.1.1 The AAP more is than a collection of site and thematic policies – i.e. it establishes a broad spatial strategy for the area, balancing growth across several key areas. Thus it was considered necessary to consider alternatives in relation to this key policy issue.

6.2 Reasons for selecting the alternatives dealt with

6.2.1 Given the need to deliver a significant amount of housing in Haringey (a densely developed borough) over the plan period it is clear that options are somewhat limited. The adopted Strategic Policies established Tottenham Hale as a 'growth area', and Tottenham High Road and North Tottenham as 'areas of change'; and it is now established - in light of updated evidence of capacity⁹ – that North Tottenham should sit alongside Tottenham Hale as a growth area.

6.2.2 However, it is nonetheless appropriate to give consideration to alternatives at the current time. Through initial discussions, the following options were discussed -

- Allocate more growth to the northern edge of Tottenham (north of Northumberland Park), where there is currently much land designated as SIL (Strategic Industrial Location), capitalising on synergies with the Enfield's planned transformative Central Leaside/Meridian Water mixed use development... with commensurately less growth to other areas.
- Allocate significantly more growth to Seven Sisters / Tottenham High Road area, given existing rail and tube links and the planned Crossrail 2 station... with commensurately less growth to other areas.

6.2.3 Subsequently, it was agreed that the first option is a reasonable alternative to the preferred strategy, whilst the second option is not.¹⁰

6.2.4 In summary, the reasonable alternatives are as follows –

Option 1 - Focus at the growth areas of Tottenham Hale and North Tottenham, with some growth also targeted at the 'area of change' of Tottenham High Road and the Seven Sisters Corridor (i.e. the Council's preferred option)

Option 2 - As per (1), but with some additional growth targeted at the northern edge of Tottenham, and commensurately less growth elsewhere.

6.2.5 These alternatives are very similar to those that were previously a focus of appraisal and consultation in February 2015.

⁹ Namely, the latest pan-London Strategic Housing Land Availability Assessment (GLA 2014).

¹⁰ Whilst the Seven Sisters / Tottenham Green area has significant transport infrastructure (existing or planned) and will play a part in delivering future growth, the area is also heavily constrained and is therefore unlikely to be a suitable location for accommodating a significant amount of additional growth. Constraints include: the historic environment (conservation areas, area of archaeological search, statutory listed buildings); and urban fabric and prevailing building heights which generally do not readily lend themselves to tall buildings. In addition, there are a limited number of available sites; and fragmented site ownership, which would require complex land assembly measures and challenge deliverability.

6.3 Summary appraisal findings

6.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix V**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings have been updated since the February 2015 Interim SA Report.

Table 6.1: Summary appraisal findings: Spatial strategy

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Education	=	
Health	=	
Housing	2	1
Community Cohesion	=	
Accessibility	1	2
Economic Growth	1	2
Economic Inclusion	1	2
Town Centres	1	2
Biodiversity	=	
Townscape and Cultural Heritage	=	
Open Space	=	
Soil and Land Quality	=	
Flood Risk and Climate Change	=	
Air Quality	=	
Energy and Carbon	=	
Sustainable Transport	=	

Relevant sustainability topics	Option 1	Option 2
The alternatives perform similarly in terms of a range of objectives, with both options likely to ensure that regeneration opportunities are realised. Option 2 would involve an additional emphasis on growth in North Tottenham, which has merit in terms of some objectives (including housing, given that some land currently used solely for employment would likely become mixed use); however, there would be a risk that diverting growth to North Tottenham would compromise the achievement of regeneration objectives at Tottenham Hale. Also, Option 2 performs poorly in terms of economic growth and economic inclusion, given the likelihood of this option necessitating re-designating Strategic Industrial Land (SIL). Whilst plans for nearby Meridian Water demonstrate the benefits that can accrue through re-designating SIL, the North Tottenham context is not the same, and it is not clear that the potential for similar benefits exists.		

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

- 6.3.2 The preferred option promotes a balanced approach to growth and development in Tottenham, in particular, a spatial scope that includes but also extends beyond North Tottenham. This option better reflects the Council's strategic regeneration objectives for the wider area, addressing local character and responding to constraints which might inhibit development of mixed and balanced communities, and taking advantage of key public transport nodes and other existing and future planned infrastructure / investment. In addition, Option 2 would require the de-designation of strategic industrial land, which, as the appraisal indicates, is likely to have significant negative effects on economic sustainability objectives. The preferred option is therefore also better placed to accommodate the quantum of planned future growth without compromising local business and employment opportunities, which are integral to Tottenham's sustainable development. A number of Regulation 18 stage consultation comments expressed concern with provision of employment land, in particular, the loss of businesses and employment opportunities. A new AAP policy NT2 reinforces the spatial strategy and objective to protect SIL in North East Tottenham.

7 EMPLOYMENT SITES

7.1 Introduction

- 7.1.1 Tottenham is home to some important designated employment locations and the future development of these sites is a strategic issue. Whilst safeguarding land for employment is important to support and promote economic development, there is significant pressure to accommodate other land uses in the area, including for housing, along with development viability issues in certain employment locations.

7.2 Reasons for selecting the alternatives dealt with

- 7.2.1 It is vital that the borough has a sufficient supply of employment land, including in Tottenham, where there are a number of designated employment sites. Given the context provided by the Strategic Policies DPD (which provides some flexibility for land uses in certain employment locations) there is a need to consider how best to maximise employment uses on existing employment sites that will be the focus of mixed use redevelopment.

- 7.2.2 The following alternatives have been appraised:

Option 1 - Allow introduction of non-employment uses (as part of mixed use schemes) in certain designated employment locations, to cross-subsidise and enable new employment development to come forward

Option 2 - Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development.

- 7.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

7.3 Summary appraisal findings

- 7.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VI**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 7.1: Summary appraisal findings: Employment sites

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Housing	=	
Community Cohesion	=	
Economic Growth	★1	2
Economic Inclusion	★1	2
Noise	=	

Summary

Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.

N.B. Appraisal findings here are the same as under the heading of 'Employment 2' within the DM Policies DPD Interim SA Report, i.e. it is not suggested that the Tottenham context has a bearing on the appraisal of alternatives in relation to cross-subsidy requirements when redeveloping existing employment sites.

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

- 7.4.1 There is a need to ensure that Tottenham's employment land is maximised for the benefit of the local community and borough. Fully employment led schemes may be difficult to deliver in certain circumstances, given viability considerations. Therefore, an approach which enables the introduction of more viable mixed use development to cross subsidise employment development is preferred. This approach will assist with driving forward regeneration in the area, with multiple benefits for the area. The policy will be delivered through a limited number of site allocations, in order to ensure that employment locations and floorspace are not compromised. The policy will also work in conjunction with the DM Policies DPD.

8 TOWN CENTRE HIERARCHY

8.1 Introduction

- 8.1.1 Setting policies for Tottenham's town centres is a key issue for the AAP given the need to maintain and enhance the role of these centres. As such, the Council recognised that it was appropriate to consider alternatives.

8.2 Reasons for selecting the alternatives dealt with

- 8.2.1 Haringey's Strategic Policies DPD sets out the borough's town centre hierarchy. Maintaining and reinforcing this hierarchy is the baseline position and should therefore be appraised. However, another option which includes a new District Centre at Tottenham Hale, within the existing hierarchy, is also a reasonable alternative. This option reflects the significant amount of growth planned for Tottenham Hale and need to appropriately support this with complementary town centre uses; in addition, the Further Alterations to the London Plan indicates potential for a future centre at Tottenham Hale and the option is in line with regional policy.

- 8.2.2 The following alternatives have been appraised:

Option 1 - Retain / reinforce the existing town centre hierarchy, along with designating a new district centre at Tottenham Hale

Option 2 - Retain / reinforce existing town centre hierarchy.

8.3 Summary appraisal findings

- 8.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Table 8.1: Summary appraisal findings: Town centre hierarchy

Relevant sustainability topics	Option 1	Option 2
Community Cohesion	★1	2
Accessibility	★1	2
Economic Growth	★1	2
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
Open Space	★1	2
Flood Risk and Climate Change	2	★1
Sustainable Transport	★1	2
Summary Option 1 would lead to a range of positive effects, including significant positive effects on: economic growth, town centres and townscape, including by promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration. Development of the district centre will also have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area. However, it is noted that Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough at little or no risk (Zone 1). Development of the Tottenham Hale district centre will need to have regard to the flood risk, but it is considered that this can be addressed through establishing requirements for flood resilience and resistance measures.		

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

- 8.4.1 The preferred option is to maintain and reinforce the existing town centre hierarchy, along with the introduction of a new District Centre at Tottenham Hale. This option will help to ensure that the future growth and regeneration of Tottenham Hale is appropriately supported, whilst reinforcing the need to maintain the vitality and viability of Haringey's other existing centres. Existing and future transport improvements will also support the delivery of this alternative. Further, the option better positions Haringey to realise the potential of Tottenham Hale within London's wider town centre network, as reflected in the Further Alterations to the London Plan. The Sustainability Appraisal highlights the significant positive effects of progressing this approach, particularly on the objectives for economic growth, townscape / cultural heritage and sustainable transport.

9 BUILDING HEIGHTS

9.1 Introduction

- 9.1.1 The London Plan requires boroughs to identify suitable locations for tall buildings and to identify these in Development Plan Documents (DPDs). Tall buildings can contribute to wider strategic objectives for regeneration and economic development, for example, by helping to maximise the use of land, including for new housing. Tall buildings can have very significant impacts, due to their size and high visibility. As such, the Council recognised that it was appropriate to consider alternatives.

9.2 Reasons for selecting the alternatives dealt with

- 9.2.1 Haringey's Strategic Policies DPD includes relevant design criteria for tall buildings, and the emerging DM Policies DPD proposes additional policies. These plans make up a baseline policy option that should be considered. However, there is an opportunity to set more specific requirements for the AAP and therefore an alternative option should be considered; this applies the baseline option, with added flexibility for the identification of specific sites and areas suited for tall buildings.

- 9.2.2 The following alternatives have been appraised:

Option 1 - A locally specific approach to building heights, including tall buildings, in the Tottenham AAP; reflecting a more proactive approach to sensitive clustering of buildings in identified sites or areas (informed by Characterisation Study and Tall Buildings Validation Study)

Option 2 - Apply more borough-wide development management policies for tall buildings (including in Strategic Policies DPD and DM Policies DPD).

9.3 Summary appraisal findings

- 9.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VIII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Table 9.1: Summary appraisal findings: Building heights

Relevant sustainability topics	Option 1	Option 2
Housing	=	
Economic Growth	=	
Town Centres		2
Townscape and Cultural Heritage		2
Sustainable Transport		2

Summary

When considering the acceptable heights of new buildings it is necessary to consider the need to respond to, and where possible help to define, the surrounding character, as well as the need to make the most of opportunities for intensification and regeneration.

The locally specific approach to building height requirements would give a greater level of control/clarity over tall building location and design, with positive effects on selected town centres; protection and enhancement of townscape character and quality; and use of sustainable transport modes (by focusing these high trip-generating developments in locations that are highly accessible by public transport). Both options would contribute to housing delivery and economic growth. No significant effects were identified.

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

- 9.4.1 The preferred approach is for a specific tall building policy for the Tottenham AAP, to be considered via site allocations and an area-specific DM policy, building on relevant adopted and emerging Local Plan policies. This policy option will provide greater level of control over tall buildings in Tottenham, helping to ensure they make a positive contribution to the area by being appropriately situated, in particular, responding to local character and situated in areas with good transport accessibility. The policy will also provide greater certainty for prospective developers about the locations where relevant proposals will be acceptable.

10 AFFORDABLE HOUSING

10.1 Introduction

- 10.1.1 The Council recognises the importance of delivering affordable housing to meet local need and as part of creating more balanced and mixed communities. There is an opportunity to assist in delivering this through more locally specific approach to affordable housing tenure split in Tottenham. Therefore the Council recognised that it was appropriate to consider alternatives relating to affordable housing tenure splits.

10.2 Reasons for selecting the alternatives dealt with

- 10.2.1 The proposed alterations to the Strategic Policy SP2 along with emerging DM Policies DPD provide a baseline position for the borough on affordable housing tenure split that should be considered for the AAP. Recognising the need to re-balance housing provision in Tottenham, particularly with the comparatively higher levels of social rented accommodation, a variation on the baseline is proposed as an alternative option.

- 10.2.2 The following alternatives have been appraised:

Option 1 - Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 60% intermediate housing (housing available at prices and rents above those of social rent but below market prices or rents) and 40% social/affordable rented housing (as per the AAP housing policy).

Option 2 - Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 40% intermediate and 60% social/affordable rented (as per the proposed alterations to Strategic Policy SP2 and policy DM13 of the emerging Development Management Policies).

10.3 Summary appraisal findings

- 10.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix IX**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Table 10.1: Summary appraisal findings: Affordable housing

Relevant sustainability topics	Option 1	Option 2
Housing	1	2
Community Cohesion	=	
Economic Growth	1	2
Summary Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability, with very high levels of people living in temporary accommodation and newcomers often leaving the area once they have established themselves more economically. The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling). Both options would support positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 would provide more intermediate accommodation and therefore would have a greater positive impact in terms rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. However, Option 1 might lead to more marked changes on the existing make-up of the local area, potentially with implications for 'community cohesion' related objectives. It is important to note that the public consultation conducted on broad proposals for Tottenham (January 2014) highlighted concerns about the impacts of area change, including on housing affordability. The Council should consider means to monitor and where necessary mitigate impacts of development on residents.		

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

- 10.4.1 The preferred option is for a localised policy which is a variation on the emerging borough-wide policy for affordable housing tenure split. This option will assist in rebalancing the comparatively high levels of social rented accommodation in Tottenham, which equates to more than 60% of the boroughs' total social rented stock. It will ensure the most effective use the funding received to help meet housing needs in Tottenham. Whilst the Sustainability Appraisal has identified potential issues in respect of area change, it is considered that the full suite of Local Plan policies will help to increase the quantum, range and quality of housing in Tottenham to better meet a wide range of housing need. Further, increasing the amount of intermediate housing will meet the needs of those who traditionally may have sought social housing but are eligible for low cost home ownership products, which the Council is seeking to encourage in Tottenham. Finally, Local Plan policies should not result in a net loss of affordable housing floorspace, in line with Strategic Policy SP2 and the emerging DM Policies DPD.

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

11 INTRODUCTION (TO PART 2)

- 11.1.1 This part of the report presents an appraisal of the Tottenham AAP as it currently stands, i.e. as presented within the current 'proposed submission' document.

12 APPRAISAL OF THE DRAFT PLAN

- 12.1.1 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.

12.2 Methodology

- 12.2.1 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach – i.e. the proposed Partial Review - on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

• Crime	• Economic inclusion	• Flood risk and climate change
• Education	• Town centres	• Air quality
• Health	• Biodiversity	• Noise
• Housing	• Townscape and cultural heritage	• Energy and carbon
• Community cohesion	• Open space	• Waste management
• Accessibility	• Water resources	• Sustainable transport
• Economic growth	• Soil and land quality	
• Skills and training		

- 12.2.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and limited understanding of the baseline. Given uncertainties there is inevitably a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted.

- 12.2.3 Assumptions are made cautiously, and explained within the text. The aim is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist. In many instances, given reasonable assumptions, it is not possible to predict significant effects, but it is possible to comment on merits (or otherwise) of the draft plan in more general terms.

- 12.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹¹ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

12.3 Crime

- 12.3.1 Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.

¹¹ Environmental Assessment of Plans and Programmes Regulations 2004

- 12.3.2 There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- 12.3.3 There are no references to crime in the **neighbourhood area sections**; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- 12.3.4 In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. However the significance of this effect is uncertain.

12.4 Education

- 12.4.1 There is a need to increase participation and attainment in education for all, not least by improving the provision of and access to education and training facilities. School attainment in the area is significantly below the London average, with children and young people who live in the more deprived areas of Haringey tending to have a lower level of achievement than those from more affluent backgrounds. As the population grows more school spaces will need to be created.
- 12.4.2 Part of the **spatial vision** for Haringey is that "new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough". Education and training are specifically addressed in the **AAP 11** dealing with infrastructure requirements and by **AAP 04** with its support for training.
- 12.4.3 The emerging DM Policies DPD sets out a policy on the use of planning obligations to secure access to jobs and training, including apprenticeships and work experience placements. As per a **recommendation** within the Interim SA Report (February 2015), the Council has introduced more locally specific requirements in the AAP, including site specific requirements for facilities, to strengthen performance against the education objective.
- 12.4.4 With regards to **neighbourhood areas**, it is noted that:
- The Tottenham Hale section includes an objective to designate sites for significantly improved community facilities including a new all form entry school
 - The North Tottenham section highlights the need for enhanced education facilities commensurate with the growth in forecast population and identifies a site for a learning and education hub
 - Tottenham Green neighbourhood area already has important cultural and education provision and this section identifies a site for new 'employment/education uses' as well as opportunities for education events on Tottenham Green.
- 12.4.5 A **site allocation** is made for the expansion (underway) of the Harris Academy in Tottenham Hale, and increased provision as part of the Northumberland Park Masterplanning area, to meet need in these growth areas.

- 12.4.6 **In conclusion**, the plan is likely to result in a positive effect on the education baseline given the focus on improving provision of education facilities. However the plan could be strengthened by expanding on these requirements further and explaining how existing provision will be improved.

12.5 Health

- 12.5.1 There is a need to improve access to health services, extend life expectancy and improve wellbeing, including by increasing access to open spaces and sports facilities. High levels of deprivation in the area are linked to health and wellbeing challenges e.g. high rates of obesity. Large numbers of hot food takeaways in parts of Tottenham are identified as having a potential negative impact on health and wellbeing. Access to GPs is significantly poorer than in other parts of Haringey and the level of planned growth in Tottenham means a need for development of more health infrastructure.
- 12.5.2 A **strategic objective** of the AAP is to provide 'a strong and healthy community' through measures such as improved health care provision, the creation of a green grid, and increasing the supply of energy-efficient homes. **AAP 01** picks up on this theme by requiring that development proposals demonstrate how they have proactively responded to the vision and regeneration objectives for Tottenham, including to improve the quality and supply of housing to meet housing needs and improve health and wellbeing.
- 12.5.3 With regard to **neighbourhood areas**, the North Tottenham neighbourhood area section highlights the need for new and enhanced health facilities and identifies sites for such provision. The Tottenham Hale section includes an objective to designate sites for improved community facilities including a new large GP surgery of 1500-2000 sqm in size.
- 12.5.4 **In conclusion**, the plan is likely to result in **significant positive effects** on the health baseline as a result of the strong emphasis on increasing and improving primary care provision as well as attention to wider determinants of health such as improved access to open space and encouragement of active travel. Such positive effects will be reinforced through implementation of policies in the DM Policies DPD, for example the policy controlling hot food takeaway locations. However, there is some uncertainty. Careful monitoring and coordinated planning will be required to ensure that sufficient new infrastructure is brought forward in a timely manner to support the significant level of residential development planned for. Health service and sports facilities should be located at sites highly accessible by walking, cycling and public transport wherever possible.

12.6 Housing

- 12.6.1 There is a need to provide greater choice, quality, quantity and diversity of housing across all tenures to meet the needs of residents. This includes refurbishing existing stock (many existing homes do not meet required standards of decency) as well as developing new supply. The aim is to create more mixed communities that have a balance of different types of housing which offer quality, affordability and sustainability (Haringey's Housing Strategy 2009-19).
- 12.6.2 Affordability of housing is a significant issue in the area. Over 60% of all social housing in the borough is located in the Tottenham wards and 36.9% of the population in Tottenham live in this housing. High levels of homelessness and overcrowding are also key issues.
- 12.6.3 The AAP aims to deliver 10,000 new homes over the period to 2026, including through the designation of Tottenham as a Housing Zone. A **strategic objective** is to create a different kind of housing market with a range of high quality housing at a range of prices and tenures.

- 12.6.4 With regard to **overarching policies**, the policy **AAP 03** requires development proposals to demonstrate how they have improved the quality and supply of housing to meet housing needs. The housing policy repeats the 10,000 homes target and the aim of contributing to mixed and balanced communities. It clarifies requirements with regards to affordable housing, densities and viability. Policy **AAP 01** also sets out that proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes as well as to create mixed and balanced communities.
- 12.6.5 All of the **neighbourhood areas** involve residential development. The neighbourhood area sections highlight indicative capacities for the number of homes to be provided on key sites as well as specific design requirements.
- 12.6.6 **In conclusion**, the plan is likely to result in **significant positive effects** on the housing baseline. In particular, the delivery of large scale growth in housing and the strong emphasis on affordability and diversity of housing to meet local needs will contribute to these effects. However, there are some uncertainties. Large scale regeneration will likely positively transform the area over time as housing quality and the wider environment is improved. Whilst the Plan's housing policies aim to create more stable, mixed and balanced neighbourhoods over the long term, development consistent with the plan policies may bring some disruption to existing communities. The council should consider how impacts of area regeneration can be monitored and where necessary mitigated.

12.7 Community cohesion

- 12.7.1 Tottenham is one of the most ethnically diverse areas in the country. 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 in Tottenham. The Haringey 'Sustainable Community Strategy 2007-2016' sets out an ambition to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.
- 12.7.2 The level of regeneration proposed, supported by the **overarching regeneration and housing policies** amongst others, should help to make the area a more attractive place to live with more stable and connected communities and better access to high quality public spaces, thus contributing further to community cohesion. However, this level of growth and change may bring some disruption to existing communities, for example where re-housing is needed to allow for refurbishment or re-provision, or where private housing rents become an issue for some residents. Such disruption will need to be managed sensitively to ensure that existing social capital is not undermined. It is noted that policy **AAP 01** sets out requirements for site masterplanning to ensure that development meets the wider objectives of the Plan. The supporting text provides that masterplans for some types of proposals, including estate renewal projects, will need to be coordinated and consultation led.
- 12.7.3 **In conclusion**, the plan is likely to result in **significant positive effects** on the community cohesion baseline, assuming that the housing policy in particular is successful at creating more mixed and balanced communities. However, there are some uncertainties. As noted above the level of regeneration being planned for in Tottenham could bring disruption to existing communities while the area undergoes transformation. This will need to be managed sensitively to ensure that existing social capital is not undermined. The AAP could consider making reference to such issues.

12.8 Accessibility

- 12.8.1 There is a need to improve access to essential services and amenities for all groups, including cultural, health, leisure and banking facilities. Access to GPs is particularly poor in the area and the level of planned growth in Tottenham means a need for development of more health infrastructure.

- 12.8.2 The Tottenham Hale District Centre **neighbourhood area policy** should improve accessibility for people living in this area to a range of services and amenities. The Green Grid policy **AAP 09** should also improve accessibility for those living near it, as well as access to the Borough's network of green and open spaces.
- 12.8.3 Policy **AAP 01** may help to support more integrated development through requirements for such comprehensive and coordinated development. However, there may be the potential to go further. Accessibility could be supported by requiring, where practicable, that local facilities are clustered together so that the services required by the community - including health infrastructure, education provision, libraries and community spaces - are provided within accessible locations. In this manner different facilities can complement each other, integrate with the function of each neighbourhood area and utilise the space required for this provision efficiently.
- 12.8.4 Policy **AAP 07** includes a range of requirements to ensure that strategic transport infrastructure is appropriately integrated into the Tottenham Area, and that new development achieves improvements in public transport accessibility, particularly to encourage modal shift and more sustainable movements. This is likely to have beneficial effects on access to local employment opportunities, services and community facilities.
- 12.8.5 With regard to **neighbourhood areas**, the development of a new district centre in Tottenham Hale providing a range of local facilities (e.g. a large GP clinic and a new school) should significantly improve access to essential services and amenities for people living in this part of Tottenham. All of the neighbourhood area sections include references to improving accessibility. For example the North Tottenham section refers to the creation of a new access bridge to the Lee Valley Park and improved east-west connections; and the Tottenham Hale section refers to improved links to the Lee Valley Park.
- 12.8.6 **In conclusion**, the plan is likely to result in **significant positive effects** on the accessibility baseline due to significant coverage of accessibility, particularly in the neighbourhood area sections. The level of regeneration proposed, including the new district centre at Tottenham Hale, provide big opportunities that must be capitalised upon. However, there are some uncertainties. It is vital that social infrastructure keeps pace with housing and population growth in the biggest growth areas, Tottenham Hale and Northumberland Park.

12.9 Economic growth

- 12.9.1 Issues relate to securing sustainable economic growth and business development, through increasing and diversifying employment opportunities, meeting the needs of different sectors of the economy and facilitating new land and business development. When it is compared with the rest of London, Haringey has levels of economic growth that are below the average, a higher rate of unemployment and lower gross weekly pay per capita. However it also has the highest start-up of new businesses in London; the economy is dominated by small businesses - 90% of businesses employ 10 or less people. Evidence suggests that employment 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.
- 12.9.2 While many of the **overarching policies** relate to the broader regeneration of Tottenham, the policy that most explicitly contributes to economic growth is **AAP 04** which sets out requirements to assist in facilitating the regeneration and renewal of Tottenham's designated employment areas. Specifically, it seeks a reconfiguration of the local employment offer in order to intensify land uses, maximise the amount of business floorspaces and premises and to increase the number and variety of jobs. The policy supports enabling mixed use schemes on selected sites where viability issues inhibit employment development, as well as a future role for Tottenham Hale as a destination for higher value, purpose built office development.

12.9.3 As all of the **neighbourhood area** sections seek to coordinate and facilitate development and provide clarity to developers it is considered that all of these sections contribute to supporting economic growth in the area. Significant flexibility is provided to enable developers to create viable schemes consistent with the Plan objectives

12.9.4 **In conclusion**, the plan is likely to result in **significant positive effects** on economic growth due to the large scale residential and employment led regeneration proposed in the AAP area by this plan. While there is some risk that there could be a loss of employment floorspace to new mixed use development, this is set to be managed and mitigated by the DM Policies DPD which makes clear that the Council will seek new development achieves the maximum amount of employment generating floorspace possible.

12.10 Skills and training

12.10.1 More Haringey employment than the London norm is with small firms often in the form of local retailers; this limits opportunities for employee training and progression within local firms. Evidence from providers active in the area suggest ongoing pressing demand for training in ESOL, literacy, numeracy and ICT, and flows of people into employment once these skills barriers are addressed.

12.10.2 Part of the **spatial vision** for Haringey is that “new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough”. There is a strategic objective in the AAP to provide “world class training and education”. Skills and training are addressed in the **overarching AAP policies**, including **AAP 11** dealing with infrastructure requirements and **AAP 04** with its support for planning contributions for training. It should be noted that these issues are also picked up in the DM Policies DPD, for example, where policies seek planning contributions to facilitate opportunities for local training, including apprenticeships.

12.10.3 There are no explicit references to skills and training in the **neighbourhood area** sections although some areas identify sites for schools and other community infrastructure, and there may be potential to use these for skills training for the wider community.

12.10.4 **In conclusion**, the plan is likely to result in positive effects on skills and training particularly through facilitating more new development in the area that will be required to make financial contributions to, amongst other things, fund local training. The significant amount of construction work will also create opportunities for on-site training and apprenticeships. These effects are not considered to be significant, and positive effects could be enhanced by setting out more specific requirements for the development of relevant training facilities.

12.11 Economic inclusion

12.11.1 There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses. Tottenham has some of the highest levels of unemployment in London and England, particularly amongst young people.

12.11.2 Tottenham is expected to meet the provision for the bulk of the London Plan’s forecast growth of 12,000 new jobs in the Borough by 2026. The AAP policies including **AAP 04** set a basis for ensuring that this job growth can be facilitated and appropriately accommodated within the area. The scale of employment growth should help to increase local access to jobs, however the extent of this access will depend, in part, on whether the employment offer is compatible with residents’ skill sets.

12.11.3 One of the Plan's strategic objectives is 'a prosperous hub for business and local employment' and seeks better access to job opportunities for Tottenham's communities. There are no explicit references to economic inclusion in the **overarching policies** but accessibility to jobs in and around Tottenham should be supported by the safeguarding and intensification of employment sites, designation of a new district centre at Tottenham Hale along with its future role for office development, and the large scale regeneration and access improvements proposed. It is noted that the matter of economic inclusion is covered in the Borough-wide policies of the adopted Strategic Policies and emerging DM Policies DPD.

12.11.4 **In conclusion**, the plan is likely to result in positive effects on economic inclusion, however the scale and significance of these effects is uncertain at this stage. This is because it is difficult to predict whether large scale residential-led regeneration of the area may lead to the loss or displacement of some local businesses (either directly or indirectly as a result of increasing rents), and if accessibility to some types of existing jobs (e.g. lower skilled jobs) could therefore be reduced.

12.12 Town centres

12.12.1 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, and the economic down turn has stunted the ability of many of these centres to fulfil their function effectively. There is a need to enhance the environmental quality of town centres (including quality of buildings and public realm), ensuring they are easily accessible and meet local needs and promoting them.

12.12.2 The spatial strategy for the AAP sets how Tottenham's centres will contribute to supporting growth and regeneration in Tottenham over the plan period. The AAP recognises, and sets out policies to ensure, that the area's town centres retain their distinctiveness and offer so as to complement and not compete with each other.

12.12.3 The **neighbourhood area sections** also touch on town centre development (e.g. improvements at Bruce Grove to consolidate and strengthen its role as the retail heart of the High Road) but the Tottenham Hale section is most significant as it highlights the intent to create a new district centre. Along new streets a range of retail, leisure or community facilities in small scale units at ground floor level will be sought. **AAP 08** is also noteworthy in its recognition of the need to appropriately manage town centre uses along the Tottenham High Road, which positively responds to the need to support the existing town centre hierarchy.

12.12.4 **In conclusion**, the plan is likely to result in **significant positive effects** on the town centres baseline (though this is to some extent dependent on wider factors such as the national economic outlook and challenges to the high street from new developments such as internet shopping). In particular, the intent to create a new district centre at Tottenham Hale will ensure that the needs of existing and new residents in this area can be better met; the proposed expansions and improvements to other centres are also important. Research has indicated that the expansion of Tottenham Hale into a District Centre (including the related intensification of retailers and services) would not detrimentally impact on the existing district centres of Seven Sisters and Bruce Grove. This is an important issue and the impacts of the developing centre on other centres should be closely monitored; the aim should be the development of complementary centres, taking into account nearby centres beyond Haringey such as the proposed new Meridian Water development in Enfield.

12.13 Biodiversity

- 12.13.1 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 Pyre'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.
- 12.13.2 None of the **overarching policies** refer to biodiversity explicitly, but the Green Grid policy **AAP 09** seeks to support the creation of a new axial link between Tottenham High Road and Lee Valley Park. This link will include high quality landscaping and is envisaged as a bold green infrastructure investment; thus it is assumed this could create some biodiversity value.
- 12.13.3 With regard to **neighbourhood areas**, the Tottenham Hale section proposes creating an improved pedestrian and cycle link to the Lee Valley Park and refers to development of the Green Grid (see above). This section also includes a riverside site where development is required to ecological interests. The North Tottenham section include requirements for new and enhanced public spaces including a large new community park; the latter could potentially create significant new biodiversity value if designed and managed for this objective. The Seven Sisters section notes where planning contributions will be sought to improve the quality and utility of the green spaces near to the site (the text also reaffirms the need to preserve and enhance the SINC and green corridor) and where the Green Grid should be facilitated.
- 12.13.4 **In conclusion**, the impact of the plan on biodiversity is unclear at this stage. An expanding population and new development is likely to be place increasing pressure on existing green spaces and biodiversity. Increased use of the Lee Valley Park as a result of improved access could have negative impacts for the biodiversity there if use cannot be properly managed. Potential positive effects include the formalisation of a Green Grid with improved links to the Lee Valley Park and other open spaces across Tottenham, and development and enhancement of some pocket parks. However the design of the former (and thus its value for biodiversity) is not clear entirely clear and effects will ultimately depend on how it is delivered. The delivery of more green space does not appear to form a prominent part of policies or many site allocations at this stage; however, it is recognised that the Strategic Policies and DM Policies DPD reflect a view that policy should primarily seek to deliver improvements to the quality and accessibility of existing spaces. The plan could be strengthened by including a more robust approach to securing the provision of green space, trees and vegetation as part of new development although it is acknowledged that the DM Policies DPD set requirements in this regard. It will be important to ensure that the pressure to meet housing delivery targets and deliver more employment floorspace is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around increasing provision of, and quality of, small parks and amenity green spaces and securing new open space as part of new development in the Tottenham area.

12.14 Townscape and cultural Heritage

- 12.14.1 Tottenham has nine Conservation Areas and 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. Key issues relate to preserving or where possible enhancing buildings and areas of architectural and historic interest.
- 12.14.2 There are several policies dealing with townscape/cultural heritage in the **overarching policies** including **AAP 05** (Conservation and Heritage), **AAP 06** (Urban Design and Character including Tall Buildings) and **AAP 08** (Tottenham High Road). These policies are also addressed in the DM Policies DPD. In light of consultation feedback and Interim SA findings, the AAP has been revised to highlight the context and specific opportunities for conserving and enhancing the historic environment, including heritage led regeneration, building on the policy proposed in the DM Policies DPD.

12.14.3 The **neighbourhood area section** and site allocations have been updated to set out key features of local character, including issues and opportunities in respect of townscape and cultural heritage which new development must positively respond to. Examples include reference in the Seven Sisters and Tottenham Green section to a need for targeted building and shop front/signage improvements consistent with the enhancement of the character, heritage and townscape attributes of the area; and reference in the Bruce Grove section to seeking limited growth consistent with the existing scale and character of the Conservation Area and town centre.

12.14.4 **In conclusion**, the impact of the plan on townscape and cultural heritage is likely to be significant. A considerable amount of work has gone into developing a targeted approach in light of consultation responses received; however, there remains some uncertainty and hence it is not possible to conclude significant positive effects. The scale of regeneration proposed will need to be carefully managed to ensure that existing assets and conservation areas are treated sensitively in all proposals. It is acknowledged that the DM Policies DPD sets out the Borough-wide approach for the conservation of heritage assets consistent with their significance, with additional requirements included in AAP 05.

12.15 Open space

12.15.1 There is a need to deliver a network of high quality, accessible open spaces across Tottenham. Tottenham has a severe problem with a lack of accessibility to the wider natural environment. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem.

12.15.2 The AAP includes an aim to create an interconnected Green Grid to link Tottenham's network of open space, which is set out in the **overarching policies**. The Green Grid policy **AAP 09** seeks to support the creation of a new axial links between Tottenham High Road and Lee Valley Park. This will include high quality landscaping and is envisaged as a bold green infrastructure investment.

12.15.3 With regard to **neighbourhood areas**, the Tottenham Hale section proposes creating an improved pedestrian and cycle link to the Lee Valley Park and refers to development of the Green Grid (see above). The North Tottenham section includes requirements for new and enhanced public spaces including a large new community park. The Seven Sisters section notes where planning contributions will be sought to improve the quality and utility of the green spaces near to the site and one site where a new or improved route should be facilitated.

12.15.4 **In conclusion**, potential positive effects include the formalisation of a Green Grid with improved links to the Lee Valley Park and other open spaces across Tottenham, and development and enhancement of some pocket parks. However the design of the former is not entirely clear at this stage and effects will ultimately depend on how it is delivered. The delivery of more open space does not appear to form a prominent part of policies or many site allocations at this stage, however it is recognised that opportunities for new open space are limited and hence there is primarily a need to deliver improvements to the quality and accessibility of existing spaces. It will be important to ensure that the pressure to meet growth targets is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around improving access to small parks and amenity green spaces and securing new open space as part of new development in North Tottenham. Robust implementation of the proposed open space policy in the DM Policies DPD should help to manage and mitigate this risk. However, the plan could be strengthened by having a more robust approach to securing new open spaces as part of new development.

12.16 Water resources

- 12.16.1 The modification of rivers in the area including in-stream structures and culverts has led to loss of habitat diversity. Upstream of its upper confluence with Pymmes Brook the River 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).
- 12.16.2 There are no explicit references to water resources in the **overarching policies** but it is clear that the substantial growth in population and business planned for in Tottenham will place greater demands on water supply and waste water infrastructure.
- 12.16.3 With regard to **neighbourhood areas**, development of the Green Grid will greatly improve access from Tottenham Hale to the open spaces and waterways of the Lee Valley Park. The Hale Wharf site, which provides access to the waterways, will be an important site. The need to ensure that development close to waterways helps to protect and where possible enhance water quality (e.g. through provision of sustainable drainage measures that cleanse water runoff) would be a useful addition. Opportunities to deculvert and improve the ecological value of waterways should also be taken.
- 12.16.4 One **site allocation** in the Seven Sisters section refers to the need to consult Thames Water *“with regards the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.”* Also, as per a **recommendation** made within the Interim SA Report (February 2015), the site allocations have been amended where relevant to note opportunities where deculverting should be investigated in order to improve the ecological value of waterways and flood risk management. Allocations also identify where sites fall within Source Protection Zones, where there is a particular need to ensure development does not adversely impact on water quality.
- 12.16.5 **In conclusion**, the plan is likely to result in increased consumption of water resources (relative to the existing situation) due to increases in water demand and potentially also increased risks to ground and surface water quality from development. However the effect relative to the baseline of ‘no plan’ is likely to be insignificant as both would involve high levels of growth in the area (this being driven by London Plan targets) and the Borough-wide DM Policies DPD include requirements for managing water resources. It is noted that the Council has been consulting with Thames Water regarding the issue of water supply and waste water infrastructure. It is understood that there is no suggestion that the total amount of development proposed in the Local Plan cannot be accommodated within existing provision, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey’s Infrastructure Delivery Plan.

12.17 Soil and land quality

- 12.17.1 The majority of development proposed in Tottenham is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Tottenham which may need to be remediated before development.
- 12.17.2 There are no explicit references to these issues in the **overarching policies**, but it is clear that the majority of development proposed in Tottenham is on brownfield land. The need to address risks from land contamination is highlighted in the DM Policies DPD.
- 12.17.3 A number of site allocations in different **neighbourhood areas** highlight the need for studies to be undertaken to understand what potential contamination there is on this site prior to any development taking place.
- 12.17.4 **In conclusion**, the plan is likely to result in positive effects on the land baseline in terms of encouraging the effective use of land through the development and remediation (where required) of brownfield land. However the effect is not considered significant as the plan contains few strong provisions.

12.18 Flood Risk and climate change

- 12.18.1 The main source of flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. Tottenham Hale has more than 50% of the ward lying within Flood Zone 2.
- 12.18.2 There are no explicit references to flood risk issues in the **overarching policies** but this is understandable given that the Development Management Policies sets out key principles and clear requirements in relation to this issue.
- 12.18.3 In the **neighbourhood areas** section the site allocations, where relevant, highlight the need to consider flood risk (e.g. sites SS2 and NT2 are in Critical Drainage Areas and site TH1 is in flood zone 2) and, where appropriate, to submit a Flood Risk Assessment.
- 12.18.4 **In conclusion**, the plan could have negative effects on flood risk without appropriate management and mitigation. This is because high levels of development are proposed for Tottenham Hale, much of which is in flood zone 2. Consequently new development in the area could exacerbate flood risk (to occupiers and/or to other buildings) by being in the flood zone as well as by increasing the risk of surface water and sewer flooding (by reducing the permeability of the ground and adding to the pressure on the combined sewers during heavy rainfall events). Also some other development sites are in critical drainage areas for surface water flooding. However management and mitigation of these potential negative effects should be provided by the Borough-wide flood risk management policies in the DM Policies DPD which will apply equally to the Tottenham area.

12.19 Air quality

- 12.19.1 There is a need to improve local air quality, including through measures to reduce car use such as encouraging businesses to produce green travel plans. The area 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.
- 12.19.2 There are no explicit references to air quality issues in the **overarching policies**; however **AAP 07** seeks to support more sustainable transport movement in Tottenham and the Borough, in part, to improve the health and well-being of Haringey's residents. The policy responds to issues raised in the Interim SA, which noted that poor air quality is primarily linked to traffic congestion and that the council should consider highlighting the need to facilitate public transport accessibility and encourage walking and cycling as part of the AAP policy.
- 12.19.3 Multiple site allocations in the **neighbourhood areas** (e.g. Seven Sisters sites SS1-SS7) refer to the need to improve local air quality on site.
- 12.19.4 **In conclusion**, the impact of the plan on air quality is likely to be limited as there are few requirements relating to this issue in the AAP. Improvements in public transport accessibility as part of wider regeneration could reduce traffic-related transport emissions per capita (albeit net emissions may increase over the plan period as these gains are offset as the new development planned for in the area brings a growing population all of whom will presumably need to travel). The council should consider measures such as provision of street trees and electric car charging points could also be encouraged to further improve air quality. This would usefully extend the broad air quality policy references included in the DM Policies DPD.

12.20 Noise

- 12.20.1 There is a need to minimise the impact of the ambient noise environment on quality of life. However, there is no suitable baseline data available for this issue.
- 12.20.2 There are no explicit references to noise issues in the **overarching policies**. However the shift from B2/B8 to B1 on some employment land sites as part of planned regeneration could reduce noise emissions and thus have benefits for any nearby housing.

12.20.3 Multiple site allocations in the **neighbourhood areas** (e.g. Seven Sisters sites SS1-SS7) refer to the need to reduce noise pollution on site.

12.20.4 **In conclusion**, the impact of the plan on noise relative to the baseline of 'no plan' is considered to be intangible given the limited coverage of this issue in the AAP. It is recognised that the DM Policies DPD sets Borough-wide policies to ensure potential sources of noise pollution are managed and appropriately mitigated, as well as ensuring the protection of amenity for building occupiers.

12.21 Energy and carbon

12.21.1 There is a need to minimise energy use and increase energy efficiency and use of renewable energy. There are considerable opportunities, given that Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in Tottenham Hale and other areas.

12.21.2 The AAP includes an emphasis on delivering energy efficient homes, including the aspiration for a decentralised energy network. **AAP 01** highlights the need to reduce carbon emissions and adapt to climate change.

12.21.3 With regard to **neighbourhood areas**, the Tottenham Hale policy states that sites within Tottenham Hale should facilitate connection to the decentralised energy network or provide part of the site as easement for the network.

12.21.4 Multiple **site allocations** are identified as being in an area with potential for being part of a decentralised energy network. For each site the AAP states that the role they play in the network could include providing an energy centre, being a customer or providing an easement for the network.

12.21.5 **In conclusion**, the impact of the plan on energy and carbon emissions relative to a baseline of 'no plan' is likely to be positive. This is because the development of a decentralised energy network, potentially connecting to the network under development in neighbouring Enfield, would provide a low carbon source of heat for new and existing buildings, helping to reduce carbon emissions per capita. However the effect is not considered to be significant as the DM Policies DPD is viewed as the key driver of decentralised energy development. The support that the AAP provides to development of decentralised energy could be strengthened by developing an area specific policy on decentralised energy that clearly allocates sites for energy centres and identifies network routes.

12.22 Waste management

12.22.1 Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and 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.

12.22.2 There are no explicit references to these issues in the **overarching policies**. This issue appears to have been left to the Strategic Policies (SP6), DM Policies DPD and the forthcoming North London Waste Plan.

12.22.3 With regard to **neighbourhood areas**, site allocation NT2 refers to an existing waste management facility and the need to provide an additional compensatory site if this were developed for a non-waste use.

12.22.4 **In conclusion**, the AAP is unlikely to have a significant effect in terms of waste management, and it is noted that the Strategic Policies (SP6) and DM Policies DPD includes policies on waste management and new waste facilities.

12.23 Sustainable transport

- 12.23.1 Tottenham has some of north London's best transport links with the Victoria line and rail services to Stratford, the City, Stansted Airport and Cambridge. Further investment in transport connectivity through Crossrail 2 (to be confirmed) and a major redevelopment of Tottenham Hale Tube, rail and bus station will further enhance this. Currently cycling only forms 2% of all journeys, more and better infrastructure is needed. Issues relate to improving walking and cycling routes, promoting the use of public transport and reducing the use of private cars.
- 12.23.2 Significant public transport investment is happening or planned across Tottenham and the DM Policies DPD contains important strategic policies that will apply to Tottenham. Within the AAP the **overarching policies** also include a clear focus on transport issues through **AAP 07** (Transport) as well as **AAP 09**, insofar as the Green Grid policy provides for a new and improved east-west walking and cycling route between Tottenham High Road and Lee Valley Park, as well as improved access to the Borough's network of open spaces
- 12.23.3 The site allocations for the **neighbourhood areas** highlight sustainable transport issues including requirements for improved railway stations (e.g. Northumberland Park, Bruce Grove), new and improved bus services and better pedestrian and cycle friendly routes (e.g. the proposed Green Link to Lee Valley Park). Some site allocations also refer to the need to minimise parking provision due to excellent local public transport connections.
- 12.23.4 **In conclusion**, the plan is likely to result in positive effects on the sustainable transport baseline through the detailed requirements in the neighbourhood areas. However, given the low level of cycling, the AAP could be strengthened by providing more detail on the proposed cycle network to ensure that a strategic approach is taken. It will be important to coordinate development with cross-borough sustainable transport projects such as the proposed Cycling Superhighway 1 running from Tottenham into the City of London. Also, further options could be considered including introducing 'car free' requirements (with the exception of disabled parking) for residential developments in highly accessible locations and/or requirements developments to support car clubs. This would build on encouragement for contributions to car club schemes or the provision of car club bays; and support for development with no on-site parking (under certain conditions) in the DM Policies DPD.

12.24 Overall conclusions and recommendations

- 12.24.1 The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with 'significant' positive effects identified as likely in terms of: health, housing, community cohesion, accessibility, town centres and economic growth.
- 12.24.2 A potential negative effect (relative to the baseline of 'no plan') is identified on flood risk, though the significance of the effect is uncertain. Flood risk policy in the DM Policies DPD should mitigate this effect to a large extent.
- 12.24.3 It is also important to point out that, whilst positive effects are generally predicted in terms of socio-economic issues/objectives, some risks are also highlighted. Specifically, there is a risk that development consistent with the proposed plan policies could lead to some disruption to existing communities. There is also a risk that some existing business sectors could be impacted by the policy focus on employment site renewal.
- 12.24.4 The appraisal has highlights a number of instances where policy approaches or wording in the plan were amended, following on from public consultation responses and findings of the Interim SA report. It is noted that a considerable amount of work has gone into strengthening the policy approach in relation to biodiversity (Green Grid) and townscape / heritage / character. However, it is considered there remain some opportunities to further refine policies in order to minimise the negative and strengthen the overall positive effects of the plan.

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

13 INTRODUCTION (TO PART 3)

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

14 PLAN FINALISATION

- 14.1.1 Subsequent to publication of the Pre-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).
- 14.1.2 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'*.

15 MONITORING

- 15.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. In-light of appraisal findings (i.e. predicted effects and uncertainties) presented in Part 2 above, monitoring efforts might focus on:
- The shift in employment types within Tottenham;
 - The effect of estate renewal on existing communities / community cohesion;
 - The legibility of historic character;
 - Flood risk mitigation measures implemented; and
 - Use of green spaces and the Lee Valley Regional Park.

APPENDIX I - REGULATORY REQUIREMENTS (1)

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

Schedule 2

Interpretation of Schedule 2

The report must include...

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the SA Report]
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	The likely significant effects associated with alternatives, including on issues such as...	
(c) the environmental characteristics of areas likely to be significantly affected;	... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i> [Part 2 of the SA Report]
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>
(i) a description of the measures envisaged concerning monitoring.	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>
	Environmental characteristics of areas likely to be significantly affected	
	Key environmental problems / issues and objectives that should be a particular focus of appraisal	

APPENDIX II - REGULATORY REQUIREMENTS (2)

Appendix I signposts to broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met.

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 5 ('What's the scope of the SA'). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix III. With regards to explaining 'how... considerations have been taken into account' - • Chapters 5 explains how/why understanding of the issues that should be a focus of alternatives appraisal was refined subsequent to consultation/SA in Feb 2015. • Chapters 6-10 explain, for each of the issues that is a focus of alternatives appraisal at the current time, how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015. • Chapters 6-10 also explain the Council's 'reasons for selecting/developing the preferred approach', i.e. explain how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. • Chapter 12 ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in Feb 2015.

f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);	- Chapter 6-10 present alternatives appraisal findings (in relation to each of the plan issues that reasonable need to be a focus of alternatives appraisal at the current time). - Chapter 12 ('Appraisal of the draft plan') presents the appraisal of the draft plan. As explained within the various methodology sections, as part of appraisal work consideration has been given to the established SA scope, and the need to consider the potential to various effect characteristics/dimensions.
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	The Feb 2015 'appraisal of the draft plan' (Chapter 17 within the Interim SA Report) made a number of recommendations, and subsequently these were taken on-board by the Council when finalising the plan for publication/submission. At the current time, Chapter 12 ('Appraisal of the draft plan') concludes by highlighting a number of ways in which the plan might 'go further' in order to more fully address specific sustainability considerations; however, no explicit recommendations are outstanding.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	As discussed, Chapters 5-10 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapters 6-10 explain the Council's 'reasons for selecting/developing the preferred approach' in-light of alternatives appraisal. Methodology/limitations are discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 15 presents 'measures envisaged concerning' monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	An Interim SA Report, which essentially presented all the information required of the SA Report, was published alongside the draft plan in February 2015, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the pre-submission plan, under Regulation 19, so that representations might be made ahead of submission.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	The Council has taken into account the Interim SA Report (Feb 2015), alongside consultation responses received, when finalising the plan for publication/submission. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when considering the plan at Examination (i.e. taken into account by the Inspector).

APPENDIX III - CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of sustainability objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal work under the SA framework.

What's the sustainability context?

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.

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.

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 2008¹². 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.

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.

What's the sustainability baseline?

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%).

¹² 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.

- 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.

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 Leaside¹³ 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.

¹³ 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 roles¹⁴ (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.

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.

¹⁴ 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.

- 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 Pymmes 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 Circus¹⁵. 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 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 level¹⁶ 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.

¹⁵ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

¹⁶ 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)

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.
- 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.

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

As explained within Chapter 4 (What's the scope of the SA?), the SA process undertaken for the Haringey Local Plan has sought to integrate EqIA and HIA. Relevant issues have been considered through scoping work (i.e. through context and baseline review - see Appendix III; and establishment of the SA framework - see Chapter 4) and have fed into the appraisal of alternatives (see 'Part 1') and the appraisal of the draft plan (see 'Part 2'). The aim of this appendix is to summarise and 'signpost'.

- Community cohesion is an important broad issue, recognising that: almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with around 200 languages are spoken; and historically, Haringey has experienced a high level of population turnover. As discussed under the 'community cohesion' heading within the draft plan appraisal (see Part 2, above), the level of regeneration proposed should help to make the area a more attractive place to live with more stable and connected communities and better access to high quality public spaces, thus contributing to community cohesion. However, this level of growth and change may bring some disruption to existing communities, for example where re-housing is needed to allow for refurbishment or re-provision, or where private housing rents become an issue for some residents. Such disruption will need to be managed sensitively to ensure that existing social capital is not undermined.
- Health is an important broad issue, recognising that: health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years); there is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. As discussed under the 'health' heading within the draft plan appraisal (see Part 2, above), a strategic objective of the AAP is to provide 'a strong and healthy community' through measures such as improved health care provision, the creation of a green grid, and increasing the supply of energy-efficient homes. AAP 01 picks up on this theme by requiring that development proposals demonstrate how they have proactively responded to the vision and regeneration objectives for Tottenham, including to improve the quality and supply of housing to meet housing needs and improve health and wellbeing.
- Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals); Children from Gypsy Roma and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small; and whilst post-16 attainment in Haringey is improving. Opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. part of the spatial vision for Haringey is that "new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough"; and it is noted that the North Tottenham section highlights the need for enhanced education facilities and identifies a site for a learning and education hub.
- Crime is an important broad issue, recognising that: there is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation; young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery; and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence. As discussed under the 'crime' heading, as part of the appraisal of the draft plan ('Part 2' above), support for regeneration in Tottenham could indirectly lead to reduced crime / fear of crime in the medium term

through creating more high quality environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.

- Housing is an important broad issue, recognising that: housing need is high amongst certain groups of residents including those with the protected characteristics, e.g. levels of homelessness are high amongst female lone parents; black households approach as homeless at a level which is more than twice their representation in Haringey's population; some protected groups also have high levels of housing need due to higher levels of vulnerability, with homeless acceptance due to mental or physical disability higher than would be expected given the profile of disability in the 2011 census. The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services, and a strategic objective of the AAP is to create a different kind of housing market with a range of high quality housing at a range of prices and tenures. Policy AAP 01 also sets out that proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes as well as to create mixed and balanced communities.
- Economic inclusion is an important broad issue, recognising that: labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics, e.g. the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities; and there is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. As discussed under the 'economic inclusion' heading, as part of the appraisal of the draft plan ('Part 2' above), Tottenham is expected to meet the provision for the bulk of the London Plan's forecast growth of 12,000 new jobs in the Borough by 2026. This scale of employment growth should help to increase local access to jobs; however, the extent of this access will depend, in part, on whether the employment offer is compatible with residents' skill sets.
- Environmental quality is an important broad issue, recognising that: the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with the protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality); environmental issues are more concentrated in certain parts of the borough, e.g. town centres are a particular focus for highway congestion and poor air quality, and there being higher accident casualty rates in the relatively deprived east of the borough; and open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough. Support for regeneration through the Tottenham AAP will contribute to improved environmental quality, and there is also set to be a targeted approach to the protection and enhancement of open space (and access to this); however, this is a subject that should be the focus of ongoing scrutiny and monitoring to ensure that opportunities are fully realised. It will be important to ensure that the pressure to meet growth targets is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around improving access to small parks and amenity green spaces and securing new open space as part of new development in North Tottenham.
- Accessibility is an important broad issue, recognising that: improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income); analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough, e.g. the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area. Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands, however, this is only set to be addressed through the plans at the current time to a limited extent, as work on the Infrastructure Delivery Plan (IDP) is still on-going, and it is through this plan that provision will primarily be made. Having said this, the Tottenham AAP is set to include a range of requirements to ensure that strategic transport infrastructure is appropriately integrated as part of regeneration, and that new development achieves improvements in public transport accessibility, particularly to encourage modal shift and more sustainable movements. This is likely to have beneficial effects on access to local employment opportunities, services and community facilities.

APPENDIX V – SPATIAL STRATEGY

Introduction

Chapter 6 (within 'Part 1', above) presents summary appraisal findings in relation to the following spatial strategy alternatives:

- Option 1 -** Focus at the growth areas of Tottenham Hale and North Tottenham, with some growth also targeted at the 'area of change' of Tottenham High Road (i.e. the Council's preferred option)
- Option 2 -** As per (1), but with some additional growth targeted at the northern edge of Tottenham, and commensurately less growth elsewhere.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

For each of the options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework.

Red shading is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text.

In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Effects are predicted taking into account the criteria presented within Regulations.¹⁷ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity).

Finally, it is important to emphasise that the approach taken strikes a balance between the desire to ensure rigorous and systematic analysis on the one hand, and ensure **conciseness / accessibility** on the other. Where an issue, or an effect characteristic, is not referenced, the implication is that there is no point to be made that warrants a mention, given the desire to be concise. That is not to say that the issue/characteristic has been entirely overlooked as part of appraisal. Similarly, the 'significance' of effects is only discussed in instances where a clear conclusion can be reached (or there is some uncertainty). In instances where significant effects are not predicted, then significance is not discussed.

¹⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale. There is very little potential to differentiate between the alternatives. Option 2 (additional emphasis on North Tottenham) might mean that there is a risk of regeneration opportunities at Tottenham Hale not being fully realised, but there is no certainty in this respect. Both options would support significant regeneration; hence, both are considered likely to have positive effects on crime. However, significant effects are not predicted, given the limited extent to which the planning system can influence levels of crime and anti-social behaviour.	=	
Education	Educational attainment in Tottenham is improving but it remains below London levels. In 2013, 69% of the pupils who live and study in the area achieved level 4+ at Key Stage 2, compared to 79% in London. 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. The AAP highlights Tottenham Green/ Seven Sisters as having an important education function. Neither option would involve a strategic focus of growth at Tottenham Green/ Seven Sisters, and there is no other basis for differentiating between the alternatives (although it is noted that the proposals for Meridian Water just across the northern borough boundary in Enfield include at least two primary schools and a secondary school, relevant to option 2). Both options would support significant regeneration, and as part of this there will be scope to significantly enhance and improve education provision in the area; however, it is not clear that either option will directly lead to significant positive effects.	=	
Health	Improving health and addressing health inequalities requires a targeted approach to addressing the wider determinants of health (e.g. access to green space and healthy food, air quality, housing, employment) as well as improved access to health services. There is very little potential to differentiate between the alternatives. One factor is the proximity of growth to the Lee Valley Regional Park, with a view to ensuring good access to high quality open space, but in this respect the alternatives perform similarly. Both options would support significant regeneration, and as part of this there will be scope to significantly enhance health service provision (e.g. access to GPs) as well as to better address the wider determinants of health such as access to green space. Either spatial strategy option would support significant positive effects.	=	
Housing	Option 2 would involve redesignating some land currently designated as Strategic Industrial Location (SIL), possibly along similar lines to proposals for the nearby Harbot Road SIL being progressed (by London Borough of Enfield) through the Central Leaside Area Action Plan. Within Harbot Rd SIL, the proposal is for the southern part to be released for residential, the northern part to be retained for industrial uses (albeit with a recognition that it will be intensified, and must function as part of a mixed use neighbourhood) and for a central belt to be a transition zone (designated as an 'Industrial Business Park'). However, it is recognised that the context at Harbot Road SIL is very different to North Tottenham, as it sits within the wider Meridian Water Housing Zone (as designated by the Mayor).	2	1

Topic	Discussion	Opt 1	Opt 2
	In conclusion, it is not entirely clear precisely what opportunities there are for delivering additional housing under Option 2, but it is appropriate to conclude that additional housing would be delivered. That said, Option 1 also performs very well in terms of this objective. Option 1 would deliver large amounts of new housing, and enable a focus on providing greater choice, quality and diversity of housing across tenures. Therefore both options are considered to have significant positive effects on this objective.		
Community Cohesion	The Tottenham riots of 2011 highlight the need to plan for maintained/enhanced community cohesion in this area in particular. Both options would involve large scale regeneration of Tottenham with the potential to significantly improve community cohesion, for example by creating integrated, mixed-tenure developments; enhancing existing town centres and improving open space provision and access. However the effect is uncertain as development could bring some disruption to existing social networks, for example as a result of re-housing to allow refurbishment and re-provision. As such, it is not possible to conclude that either option would lead to significant effects. There is arguably some potential to differentiate between the alternatives, in that Option 2 would involve an increased emphasis on redevelopment / change within North Tottenham. However, it is not possible to differentiate with any certainty. On one hand, additional housing in close proximity to an area of Estate Renewal (Northumberland Park) could lead to benefits / help to ensure that negative effects are minimised; however, on the other hand, redevelopment of employment land (which would be likely) might be classed as redevelopment with less of an explicit focus on regeneration.	=	
Accessibility	Access to cultural and leisure facilities and to essential services (banking, health, education) varies between neighbourhoods. The three District Centres are within the southern half of Tottenham, at Bruce Grove, Seven Sisters and Tottenham Hale, whilst in the northern half of the area there are just two local centres. Under Option 1 there will be scope to significantly improve access, through development of a new district centre in Tottenham Hale and also development in North Tottenham capitalising on the investment being made by Tottenham Hotspur FC on their stadium site. Significant positive effects are likely. Option 2 might bring with it the risk that opportunities in Tottenham Hale might not be realised to the fullest extent, and that there might be an over-supply of housing (from an access perspective) in the north of the area (albeit recognising that the area is also in close proximity to Meridian Water, where a new local centre is set to be delivered through the emerging AAP). On this basis, significant positive effects are not predicted.	★1	2
Economic Growth	High and increasing unemployment is perhaps the greatest challenge facing the borough; Tottenham has some of the highest levels of unemployment in London and the UK. A tenth of all Job Seekers Allowance claimants in Haringey (10,500) live in the Northumberland Park Ward, which has the highest number of out of work benefits claimants in London. While both options should generate more new employment opportunities in Tottenham (relative to the baseline 'no plan' scenario), there will also be some losses and/or disruption to existing businesses. Option 2 would likely entail re-designating the Strategic Industrial Land which sits adjacent to the boundary with Enfield (e.g. Brantwood estate); this would have a significant adverse effect on job creation, the local economic base and ultimately the job	★1	2

Topic	Discussion	Opt 1	Opt 2
	numbers target attributed to Haringey. Option 1 is therefore the preferred option here, and significant negative effects are predicted for Option 2.		
Skills and Training	Access to training facilities should be enhanced as part of wider regeneration efforts. It may be possible to secure skills and training benefits for local people through the construction process. However, the spatial strategy has little bearing on this objective.	n/a	
Economic Inclusion	Physical accessibility to jobs should be enhanced as part of the large scale of regeneration in Tottenham anticipated under both options, including through new employment opportunities and improved transport links. However option 2 would likely entail re-designating the Strategic Industrial Land which sits adjacent to the boundary with Enfield (e.g. Brantwood estate); this would have an adverse effect on the local economic base and thus on physical accessibility to jobs in this part of Tottenham. Particular groups might be particularly affected, specifically those who rely on employment within industrial sectors. This is an important consideration, as a lack of transferable skills may mean an increased risk of unemployment. On this basis, significant negative effects are predicted for Option 2.	★ 1	2
Town Centres	Both options would support the improvement of the viability and vibrancy of Tottenham's District Centres and Local Centres. The creation of the new district centre at Tottenham Hale, to support large scale residential-led regeneration in the area, would be likely under both option; however, there might be a risk that opportunities are not realised to the fullest extent under Option 2 (as this option would involve diverting some growth from Tottenham Hale to North Tottenham).	★ 1	2
Biodiversity	The spatial strategy is a consideration, as it has a bearing on the extent to which residents are able to access the Lee Valley Regional Park (access currently being quite poor), which straddles the eastern boundary of Tottenham. It might be suggested that increased access leads to risks to biodiversity; however, effects would always be uncertain, given the potential to manage access. Significant negative effects are unlikely. It is not clear that it is possible to differentiate between the alternatives. Both Tottenham Hale and North Tottenham are associated with opportunities to improve east-west links through to the Regional Park.	=	
Townscape and Cultural Heritage	Tottenham has nine Conservation Areas and includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas. It might be suggested that Option 2 is preferable as additional growth in North Tottenham would take the pressure of the need to redevelop within areas that are more sensitive from a heritage perspective (e.g. areas along the Tottenham High Road designated as a Conservation Area); however, this is highly uncertain. There is good potential for redevelopment to facilitate the achievement of heritage objectives, e.g. by improving the setting of listed buildings so that their heritage significance is better appreciated.	=	
Open Space	Tottenham has a severe problem with a lack of accessibility to the wider natural environment. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is poor. It is not clear that either option has the potential to result in significant effects,	=	

Topic	Discussion	Opt 1	Opt 2
	as the broad spatial strategy does not have a direct bearing on the resource of open space. Under either option there would be opportunities to improve access to open space, particularly by improving east-west links through to the Lee Valley Park from Tottenham Hale and Northumberland Park. It might be suggested that Option 2 would lead to the potential to create new open spaces; however, there is no certainty in this respect.		
Water Resources	It is not clear that the broad spatial strategy has a bearing on water resource objectives. It is not thought that there are any areas within Tottenham where growth should be restricted because of a sensitive water environment; and under either option it will be possible to put in place sustainable drainage systems, and design-in water efficiency measures.	n/a	
Soil and Land Quality	The majority of development proposed in Tottenham is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Tottenham which may need to be remediated before development. It might be suggested that Option 2 is preferable, as it would likely involve additional redevelopment of employment locations where contamination may be an issue, but there is no certainty.	=	
Flood Risk and Climate Change	The main source of flood risk within the borough is the River Lee; there is also some risk from surface water and groundwater flooding. Tottenham Hale has more than 50% of the ward lying within Flood Zone 2. Much of the area to the north and east of Northumberland Park along the boundary with Enfield also lies within Flood Zone 2. On the basis of this discussion, it is not possible to differentiate between the alternative. Significant negative effects are not necessarily likely under either option, given the potential to address flood risk through site allocations, masterplanning and design measures.	=	
Air Quality	The area suffers poor air quality, primarily because of traffic congestion. Improving air quality is a challenge, particularly along major roads which provide a significant proportion of PM10 concentrations in Haringey. Without detailed investigation, it is difficult to be certain regarding the merits of the alternatives in terms of avoiding traffic congestion. Tottenham Hale is set to develop as a transport hub, with a new bus interchange facility, a new station, improved train frequencies, and Crossrail 2 in the long term; whilst North Tottenham will benefit from increased train frequencies at Northumberland Park station and Crossrail 2 in the long term.	=	
Noise	Option 2 could potentially involve some additional mixed use redevelopment of existing employment sites, which is a strategy that leads to challenges in terms of managing noise pollution, and residential amenity more generally. However, it is not clear that this is a significant consideration. There is the potential to address such issues through masterplanning and design.	n/a	
Energy and Carbon	Haringey is planning to develop decentralised energy networks to supply energy efficiently to buildings in Tottenham Hale and Northumberland Park, the latter connecting to an energy centre in the new Meridian Water development in Enfield (decentralised energy 'connection zones' are identified in the DM Policies DPD). On this basis, there is little potential to differentiate between the alternatives. It might be suggested that either spatial strategy option has the potential to lead to significant positive effects; however, there is a need to consider that wider factors will also have a significant bearing on per capita emissions, such as tightening of the energy efficiency standards for new homes (in the Building Regulations), changes in transport technology and changes in the	=	

Topic	Discussion	Opt 1	Opt 2
	efficiency of household appliances.		
Waste Management	Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and 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. It was judged that the alternative options would have little bearing on this topic. Strategic Policies and Development Management policies in waste and recycling will have a far greater effect.	n/a	
Sustainable Transport	Both spatial strategy options involve significant growth at Tottenham Hale. This will be centred on a redeveloped Tottenham Hale station (with better facilities for buses, cyclists and pedestrians) which already has excellent transport links via National Rail and London Underground services and may also serve Crossrail 2 in future. This should have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area. Growth in North Tottenham will be accompanied by access and interchange improvements to White Hart Lane and Northumberland Park stations respectively, supporting increased use of these rail links (and possibly also Crossrail 2 in future). Also, the relocation of Angel station in Enfield southwards to provide a new station to serve the Meridian Water development may also offer an alternative option for developments located on the northern edge of Tottenham. Overall it is anticipated that both spatial strategy options would have significant positive effects on sustainable transport, and there is little potential to differentiate between the alternatives.	=	
<u>Summary</u> The alternatives perform similarly in terms of a range of objectives, with both options likely to ensure that regeneration opportunities are realised. Option 2 would involve an additional emphasis on growth in North Tottenham, which has merit in terms of some objectives (including housing, given that some land currently used solely for employment would likely become mixed use); however, there would be a risk that diverting growth to North Tottenham would compromise the achievement of regeneration objectives at Tottenham Hale. Also, Option 2 performs poorly in terms of economic growth and economic inclusion, given the likelihood of this option necessitating re-designating Strategic Industrial Land (SIL). Whilst plans for nearby Meridian Water demonstrate the benefits that can accrue through re-designating SIL, the North Tottenham context is not the same, and it is not clear that the potential for similar benefits exists.			

APPENDIX VI – EMPLOYMENT SITES

Introduction

Chapter 7 (within 'Part 1', above) presents summary appraisal findings in relation to the following spatial strategy alternatives:

Option 1 - Allow the introduction of non-employment uses (as part of mixed use schemes) in certain re-classified employment locations, to facilitate regeneration led mixed use development

Option 2 - No allowance for cross subsidy. Only allow employment uses on designated sites.¹⁸

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Mixed use schemes (Option 1) ensure that sites are busy throughout the day, therefore reducing risk of crime / fear of crime.	★1	2
Education	No notable implications.		
Health	No notable implications.		
Housing	A requirement to cross-subsidise employment development could make redevelopment less of an attractive option, meaning that it is less likely that housing would come forward. However, in practice it is not thought that this will be the case in Haringey. There is also an argument to suggest that, under Option 2 (no cross subsidy) it could be the case that existing employment sites are developed more intensively for residential uses, which might not be ideal from a 'housing' perspective if the buildings and locations are not ideal (e.g. because of layout, design or access to services/facilities).	=	
Community Cohesion	Under Option 1 the design of any new mixed use development in an employment area would have to be carefully considered to ensure that a genuine and cohesive 'community' was created.	=	
Accessibility	No notable implications.		
Economic Growth	Cross subsidy (Option 1) is a means of ensuring that sites that already perform an employment function continue to do so, and it is likely that the nature of employment development that comes forward through cross-subsidy will be of a type (e.g. knowledge or creative industries) that is needed from an economic growth perspective. Significant positive effects are likely.	★1	2
Skills and Training	No notable implications.		
Economic Inclusion	Creating mixed use development promotes flexible working patterns and good physical accessibility to local jobs in the employment location and may help to cross subsidise employment uses that create jobs and opportunities for new businesses to establish.	★1	2

¹⁸ N.B. These alternatives are also appraised within the DM Policies DPD Interim SA Report

Topic	Discussion	Opt 1	Opt 2
	Regeneration of employment areas could have negative impacts on existing businesses if increases in average rents or changes in floorspace provision force them to relocate. However this should be mitigated by the requirement in Policy DM 48 for a proportion of the provided employment floorspace to be affordable workspace in perpetuity.		
Town Centres	No notable implications.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site is likely to mean that the employment use is office based, leading to fewer problems around noise and disturbance.		=
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	No notable implications.		
<u>Summary</u> Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents. N.B. Appraisal findings here are the same as under the heading of 'Employment 2' within the DM Policies DPD Interim SA Report, i.e. it is not suggested that the Tottenham context has a bearing on the appraisal of alternatives in relation to cross-subsidy requirements when redeveloping existing employment sites.			

APPENDIX VII – TOWN CENTRE HIERARCHY

Introduction

Chapter 8 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for town centres:

Option 1 - Retain / reinforce existing town centre hierarchy, along with designating a new district centre and (associated town centre management policies) at Tottenham Hale

Option 2 - Retain / reinforce existing town centre hierarchy.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	No notable implications.		
Housing	No notable implications.		
Community Cohesion	Retention and reinforcement of existing town centres would be expected to improve community cohesion, particularly with regard to cultural identity, belonging and well-being. At present, the Tottenham Hale area lacks cohesion and legibility. As such, Option 1 provides an opportunity to improve the physical condition of the area which in turn would be expected to have a positive effect on community cohesion.	★1	2
Accessibility	Option 1 provides the opportunity to redevelop the area around Tottenham Hale which could include improving access to the adjoining Lee Valley Regional Park, an important cultural and leisure facility in Tottenham.	★1	2
Economic Growth	The retention and reinforcement of existing town centres would encourage sustainable economic growth. Option 1, promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration in the area would be likely to have a significant positive effect on economic growth.	★1	2
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	Both options would support the improvement of the viability and vibrancy of the borough's town centres. The creation of the new district centre at Tottenham Hale, to support large scale residential-led regeneration in the area, is considered to be a significant positive effect due to the opportunity the development of a new town centre in this location creates.	★1	2
Biodiversity	No notable implications.		

Topic	Discussion	Opt 1	Opt 2
Townscape and Cultural Heritage	Both options would support the improvement in townscape terms of the borough's town centres. The area around Tottenham Hale is recognised as currently having low townscape value. Designation and redevelopment of this area as a new district centre is considered likely to have a significant positive effect due to the opportunity to substantially improve the quality of the area.	★1	2
Open Space	Option 1 provides the opportunity to redevelop the area around Tottenham Hale which could include improving access to the adjoining Lee Valley Regional Park.	★1	2
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough little or no risk (Zone 1). Development of the Tottenham Hale town centre will need to have regard to the flood risk but it is considered that this can be addressed through requirements for flood resilience and resistance measures.	2	★1
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	As described in Tottenham Hale Urban Centre Masterplan Supplementary Planning Document (2006) a new district centre at Tottenham Hale would be centred on a redeveloped Tottenham Hale station (National Rail and London Underground services). The upgrade also includes better facilities for buses, cyclists and pedestrians. Development of a new district centre is considered to be a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area. This positive effect would be even greater if a station at Tottenham Hale is confirmed as part of the Crossrail 2 project.	★1	2
Summary Option 1 would lead to a range of positive effects, including significant positive effects on: economic growth, town centres and townscape, including by promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration. Development of the district centre will also have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area. However, it is noted that Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough at little or no risk (Zone 1). Development of the Tottenham Hale district centre will need to have regard to the flood risk, but it is considered that this can be addressed through establishing requirements for flood resilience and resistance measures.			

APPENDIX VIII – BUILDING HEIGHTS

Introduction

Chapter 9 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for building heights policy:

- Option 1 -** Apply locally specific requirements for building heights, including high rise buildings, in specific locations in Tottenham; with the aim of ensuring that the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification/regeneration
- Option 2 -** Apply borough-wide development management policies for tall buildings/character (e.g. policy DM5 of the Development Management Policies).

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	No notable implications.		
Housing	The development of tall buildings can contribute to housing delivery. Policy DM5 of the Development Management Policies sets out areas suitable for tall buildings and key design criteria. Within the context of this policy it is considered that option 1 and 2 would have little differential impact on overall housing delivery, therefore both options have been ranked equally.	=	
Community Cohesion	No notable implications.		
Accessibility	No notable implications.		
Economic Growth	The development of tall buildings could create additional space for business development and new employment opportunities. However indiscriminate development of tall buildings could put pressure on infrastructure including transport infrastructure, potentially undermining growth prospects. On balance it is considered that there is insufficient evidence to judge the relative performance of Option 1 and 2 against this objective, therefore both options have been ranked equally.	=	
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	The Tottenham Hale neighbourhood area, a proposed new district centre, includes a number of sites identified as suitable locations for tall buildings and establishes specific height and design requirements. In this regard, the greater level of site specific control/clarity for this town centre afforded by		2

Topic	Discussion	Opt 1	Opt 2
	Option 1 will be positive in terms of enhancing the town centre.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	Option 1 takes a location specific approach to building heights based on ensuring that the height of new buildings responds to and helps to define the surrounding character. In this regard, the greater level of control for specific locations afforded by Option 1 should have a positive effect in terms of protecting and enhancing townscape character and quality (and potentially improving legibility) whilst allowing high quality high rise development in suitable locations.		2
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	The location specific approach to building heights allows for taller buildings in particular locations that have high public transport accessibility such as Tottenham Hale, Apex House and close to Northumberland Park station and White Hart Lane stations (the possible exception being adjacent to the stadium development at Northumberland Park). Focusing these high trip-generating developments in such locations will support increased sustainable transport use per capita.		2
<u>Summary</u> When considering the acceptable heights of new buildings it is necessary to consider the need to respond to, and where possible help to define, the surrounding character, as well as the need to make the most of opportunities for intensification and regeneration. The locally specific approach to building height requirements would give a greater level of control/clarity over tall building location and design, with positive effects on selected town centres; protection and enhancement of townscape character and quality; and use of sustainable transport modes (by focusing these high trip-generating developments in locations that are highly accessible by public transport). Both options would contribute to housing delivery and economic growth. No significant effects were identified.			

APPENDIX IX – AFFORDABLE HOUSING

Introduction

Chapter 10 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for building heights policy:

- Option 1 -** Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 60% intermediate accommodation (housing available at prices and rents above those of social rent but below market prices or rents) and 40% social/affordable rented accommodation (as per the AAP housing policy)
- Option 2 -** Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 40% intermediate accommodation and 60% social/affordable rented accommodation (as per policy DM17 of the Development Management Policies and the Further Alterations to the London Plan).

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.		
Education	No notable implications.		
Health	No notable implications.		
Housing	Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham, partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability. Tottenham has very high levels of people living in temporary accommodation, and some newcomers are compelled to leave the area once they have established themselves more economically. The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling). The impact of both options on this objective are considered to be positive and significant in terms of improving the supply of affordable housing. Option 1 would provide more intermediate accommodation than option 2 and therefore would have a greater positive impact in terms rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. Therefore option 1 is the preferred option for addressing this objective. It is important to note however that both options are likely to contribute to positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 may lead to more marked changes on the existing make-up of the local area, as it provides for more intermediate housing and less social/affordable rented housing.	1	2
Community	Both options would support creation of a more stable and mixed	=	

Topic	Discussion	Opt 1	Opt 2
Cohesion	communities. However in the short term the large scale regeneration may create disruption for existing residents, which will need to be managed as effectively as possible.		
Accessibility	No notable implications.		
Economic Growth	Both options would support delivery of a range of high quality housing that will attract more people and more wealth to the area, supporting local economic growth. Option 1 may have the greater impact on economic growth as it would create more intermediate housing than option 2, thus attracting more residents that are able to afford this form of housing and by extension more disposable income to spend locally.	★1	2
Skills and Training; Economic Inclusion; Town Centres; Biodiversity; Townscape and Cultural Heritage; Open Space; Water Resources; Soil and Land Quality; Flood Risk and Climate Change; Air Quality; Noise; Energy and Carbon; Waste Management; and Sustainable Transport: No notable implications.			
<u>Summary</u> Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability. with very high levels of people living in temporary accommodation and newcomers often leaving the area once they have established themselves more economically. The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling). Both options would support positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 would provide more intermediate accommodation and therefore would have a greater positive impact in terms rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. However, Option 1 might lead to more marked changes on the existing make-up of the local area, potentially with implications for 'community cohesion' related objectives. It is important to note that the public consultation conducted on broad proposals for Tottenham (January 2014) highlighted concerns about the impacts of area change, including on housing affordability. The Council should consider means to monitor and where necessary mitigate impacts of development on residents.			