

CORE STRATEGY EXAMINATION –
HEARING SESSION 8, 22nd FEBRUARY 2012

2a Sustainability Appraisal

i) Does the SA make a robust and justified assessment of the changes to SP8 (particularly as regards the Friern Barnet Site, the scoring matrix and its conclusions)?

a. Planning Policy Statement (PPS) 12: Local Spatial Planning 2008 states that to be 'justified' a DPD needs to be founded on a robust and credible evidence base involving:

- *Participation - evidence of the views of the local community and others having a stake in the area*
- *Research/fact finding – evidence that the choices made in the plan are backed up by the background facts*

PPS12 para 4.37

b. In carrying out the Sustainability Appraisal (SA) including the Addendum SA in relation to SP8 the assessment has followed the regulations and guidance on SA/SEA as detailed in section 2.2 and 2.3 of the Addendum SA (CSSD-05a) and also section 2 of the Submission SA (CSSD-05).

c. The local community has been consulted at each stage of the Core Strategy process in accordance with the Statement of Community Involvement (Section 3 and Appendix 5 CSSD-08) and the representations received have been fed into all iterations of the plan making process. As a result of further evidence with regards to the Borough's employment land, Policy SP8 was re-assessed and consulted upon. The results of the re-assessment are set out in the Addendum SA (CSSD-05a).

d. The evidence documents used in the SA are set out in SA Appendices (CSSD-08) and the Core Strategy document list. Further details on how the SA process was carried out are set out in **Factual Matter 4: Sustainability Appraisal**. (FS-4)

Scoring Matrix – major positive impacts

e. SP8 scores a *major positive* score for *SAO7: To encourage sustainable growth and business development across the borough*. The commentary states that this is because the main aim of the policy is to provide the opportunity for economic growth in the long term. Safeguarding these employment sites will provide benefits to the social economy and will contribute to the London wide framework of sites for industry, business and warehousing.

f. The Additional Regulation 27 on Affordable Housing and Employment Land Designations, Sept 2011 (CSSD-03a) sets out the key evidence that has been used in the development of the policy (Section 5.1.16 and Appendix 1), which supports the protection of the employment designations. In particular, the

employment studies support the need to provide for future employment floorspace in order to enable future growth. Current supply is limited and needs to be protected in order to safeguard employment clusters and industrial use. Such protection will also provide choice and flexibility as circumstances change over the life of the Core Strategy in line with planning policy guidance.

- g. A major positive impact is also given for *SAO15: To encourage the use of previously developed land*. The SA assesses the impact of the strategic policy as a whole. The Friern Barnet site is identified as a former sewage works and has also been identified as a potential site for waste management in the draft North London Waste Plan. Any effects of detailed proposals would need to be assessed as part of any planning application. It is proposed that there should be no net loss of biodiversity and that contamination should be improved. The assessment reflects the need to protect employment land whilst protecting any biodiversity value.

Scoring matrix - negative Impacts

- h. SP8 scores a negative impact for *SAO11: To protect and enhance biodiversity*. The commentary for SAO 11 refers to the SINC for Friern Barnet, which protects the site but recognises that there could be a potential negative impact on biodiversity owing to the dual designation. The description of the land at Friern Barnet is part of the statement from the 2003 Nature Conservation report by the GLA. It is also recognised that the site is adjacent to MOL and an ecological corridor and could therefore have indirect impacts upon wildlife corridors. Mitigation is proposed such as translocation, enhancement and the maintenance of a net balance for biodiversity in the borough. The dual designation of the Friern Barnet site ensures that the Core Strategy remains flexible to allow for future changes in circumstances inline with planning policy guidance.
- i. The SA assesses the policy as a whole. Any effects of detailed proposals will be considered in the SA of the Site Allocations DPD and at the planning application stage.
- j. A negative impact is also given for *SAO17: To protect and improve air quality*. Haringey declared the entire Borough an Air Quality Management Area in 2001. The Air Quality Action Plan 2011 sets out the Council's proposals and actions to work towards the Government's air quality objectives in respect of the pollutants of concern, including monitoring the effectiveness of the proposals introduced. The assessment recognises that the policy is likely to increase economic activity and road traffic, resulting in an increase in emissions and a negative impact on air quality. Mitigation is proposed through the use of energy efficient development and the encouragement of sustainable modes of transport. Specifics will be assessed at the detailed application stage including the use of air quality assessments. Future monitoring will be reflected in updates to the Air Quality Action Plan.

- k. A possible negative impact is given for SAO14: *To protect and enhance the quality of water features and resources.* The commentary states that *‘there are no water bodies within the Friern Barnet site to protect but nearby water features in Hollickwood Park could potentially be affected.’* The matrix should read *‘there are no standing water bodies’* within the site. This error and other minor errors that have been identified will be set out in an erratum for clarity.
- l. The SA report page 7 has also identified a drainage culvert on the site, but this is currently broken with no water flowing on the site, and recognises that there may be potential to de-culvert it as part of any redevelopment. The drainage culvert is a matter of detail that requires further site investigation that will be addressed in the Site Allocations DPD and any planning applications for the site.

Uncertain Impacts

- m. Uncertain impacts are recorded against some of the sustainability objectives. This method of scoring is in line with the regulations and guidance, which recognises that there will inevitably be some uncertain effects and suggest that this is an appropriate scoring method.
“The Environmental Report must document any difficulties such as uncertainties or limitations in the information underlying both qualitative and quantitative predictions.” **Page 32 : A Practical Guide to the SEA Directive, ODPM 2005**
- n. Where uncertainties have been identified owing to a lack of detailed information at this stage in the process, the impacts will be considered either in the SA of Sites Allocations DPD or any planning applications.

Conclusions

- o. A summary of the scoring matrix is provided in the conclusions to the matrix (page 21 of the Addendum SA). A more detailed summary of the findings of the SA is set out in Section 4: Appraisal findings of the Addendum SA (page 5), with more detailed comments provided on Friern Barnet (page 6). Further Conclusions and Recommendations (page 10) provide detail of the mitigation measures that will be needed.
- p. It is concluded that the overall effects of Policy SP8 are positive with the protection of sites encouraging more sustained economic activity, increasing employment and in turn contributing to a reduction in crime and health inequalities. The appraisal also recognises that there are potential negative effects. With specific reference to the Friern Barnet site the appraisal states: *‘The Friern Barnet site is a brownfield site, which is also a Site of Importance for Nature Conservation, with some known biodiversity value. Any development of the site therefore has potential to have biodiversity impacts’* **page 6**
- q. Mitigation measures include the need for any development to consider its impact on biodiversity, townscape and sustainable transport. Specific mitigation measures for Friern Barnet are set out on pages 10 and 11.

- r. Some minor errors in the scoring matrix have been identified. An erratum will be provided to explain the errors and provide corrections, including details of any impacts upon the SA results. The errors are not considered to have any significant impact upon the results of the SA or the policy.

- ii) **Does the SA make a robust and justified assessment of the changes relating to SP2 housing matters?**
 - a. The Addendum SA has not considered SP2 as no new evidence has come forward since the submission SA (CSSD-05 page 2). Further details on the process the SA followed, including the community consultation, are set out in **Factual Matter 4: Sustainability Appraisal (FS-4)**. The Submission SA that assessed SP2 is considered to be robust and justified.