



London Borough of Haringey

Local Plan

Strategic Environmental Assessment and
Sustainability Appraisal

Post Adoption Statement

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Post Adoption Statement

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Abbreviations

AAI	Areas of Archaeological Importance
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BREEAM	Building Research Establishment Environmental Assessment Method
DPD	Development Plan Document
EIA	Environmental Impact Assessment
GLA	Greater London Authority
LDF	Local Development Framework
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SFRA	Strategic Flood Risk Assessment
SuDS	Sustainable Drainage Systems

1 Introduction

1.1 Purpose of the SA

The requirement for SA was formally identified in Section 19 (5) of the Planning and Compulsory Purchase Act 2004 which requires an appraisal of sustainability to be carried out for Local Development Documents. In paragraph 165, the National Planning Policy Framework (NPPF) (March 2012) requires that:

“A sustainability appraisal which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider all the likely significant effects on the environment, economic and social factors.”

The SA process therefore incorporates the requirements of EU Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, known more commonly as the ‘SEA Directive’. This was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations).

SEA is a process for identifying and assessing the likely significant environmental effects of a plan or programme and its alternatives. However, SA covers wider social and economic effects of plans, as well as the more environmentally-focused considerations in the Directive. Compliance with the Directive requires a number of specific steps and activities, including consultation.

The purpose of the SA is to promote sustainable development through better integration of sustainability considerations into the preparation of the Local Plan. As part of this process, a combined SA and SEA was undertaken.

The appraisal process has run simultaneously with the development of the Local Plan. From its commencement, the findings of the appraisal have fed into the plan-making process to improve the Local Plan as it develops. This SA process is iterative and has sought to appraise the Local Plan during the various stages of plan development. This iterative process is to ensure the production of sustainable policies. The involvement of the stakeholders in the process has also ensured that the Local Plan and the SA has complied with the Sustainable Community Strategy.

The SEA and SA process (hereafter referred to as a SA) has now been completed and this Post Adoption Statement is the last stage in the process that explains how the SA has been integrated into the development of the Local Plan.

This SA Statement should be read in conjunction with the SA Reports produced.

Table 1-1 presents the structure of the Post Adoption Statement.

Table 1-1 Structure of the Post Adoption Statement

Section	Title	Contents
1	Introduction	Outlines the purpose of this report.
2	Background to the SA Process	Sets out the SA Process and Stages
3	How Sustainability considerations have been integrated into the plan and how sustainability appraisal has been taken	Outlines the key stages of the SA process to date. This section also summarises the comments received from statutory consultees and stakeholders and sets

Section	Title	Contents
	into account	<p>out how they were taken into account in the Haringey Local Plan.</p> <p>During the SA of the Local Plan's options and policies, a number of potential sustainability improvements were identified that could strengthen the plan as it evolved. This section outlines the key findings made in relation to the options and policies of the Local Plan, as presented in the SA Reports.</p>
4	Reasons for choosing the document as adopted in light of other alternatives	This section outlines the assessment of alternatives and how the SA findings were taken into account.
5	Monitoring	This section outlines the proposed monitoring framework that will be used to monitor significant effects of the Local Plan.
6	Conclusion	This section comprises concluding comments about the main findings of this report and the benefits of the SA process.

1.2 Purpose of the Post Adoption SEA Statement

This statement has been prepared in accordance with the Environmental Assessment of Plans and Programmes Regulations 2004(16) (1) and (2) which require a statement to be produced on adoption of a plan or programme. The SA undertaken for the Local Plan widens these considerations from the environmental, to broader sustainability issues, so that this statement provides information on the wider sustainability appraisal process, including:

- How the Sustainability considerations have been integrated into the plan or programme;
- How the Sustainability Appraisal Report has been taken into account;
- How opinions expressed through public consultation have been taken into account;
- The reasons for choosing the plan or programme as adopted, in the light of other reasonable alternatives dealt with; and
- The measures taken to monitor the significant sustainability effects of the implementation of the plan or programme.

2 Background to the SA and SEA Process

As part of the preparation of the Local Plan, the Council is required to undertake SA. SA is mandatory for DPDs under the requirements of the Planning and Compulsory Purchase Act (2004). SAs of DPDs should also incorporate the requirements of the European Directive 2001/42/EC, known as the SEA Directive. The Directive is transposed into law by the Environmental Assessment of Plans and Programmes Regulations 2004 (SI 2004 No 1633) (the SEA Regulations). The preparation and revisions to the Local Plan has been subject to the procedural and legal requirements of the SEA Regulations. The SA process drew upon the following legislation and guidance:

- EU Directive 2001/42/EC (the SEA Directive);
- Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations);
- Office of the Deputy Prime Minister *et al* (now Department of Communities and Local Government (DCLG)) (2005). A Practical Guide to the Strategic Environmental Assessment Directive;

- DCLG Plan Making Manual
- National Planning Policy Framework (March 2012)

2.1 SA Stages

Table 2-1: SA Stages

STAGES IN THE SA PROCESS
STAGE A: Setting the context and objectives, establishing the baseline and deciding on the scope
Task A1: Identify other relevant plans, programmes and sustainability objectives. Task A2: Collect relevant baseline information and characterise the area. Task A3: Identify sustainability issues and problems. Task A4: Develop the SA Framework including objectives, indicators and targets. Task A5: Consult on the Scope of the SA
STAGE B: Developing and refining options and assessing effects
Task B1: Test the plan objectives against the SA framework. Task B2: Develop the plan options. Task B3: Predict the effects of the plan, including plan options. Task B4: Evaluate the effects of the plan. Task B5: Consider ways to mitigate adverse effects and maximise beneficial ones. Task B6: Propose measures to monitor the significant effects of implementing the plan.
STAGE C: Prepare the Sustainability Appraisal Report
Task C1: Prepare the SA Report
STAGE D: Consulting on the draft plan and SA Report
Task D1: Consulting the public and consultation bodies
Task D2 (i) and (ii): Appraise significant changes resulting from representations

3 How sustainability considerations have been integrated into the plan and how sustainability appraisal has been taken into account

3.1 Local Plan SA Process

The Haringey Local Plan has been subject to an SA process that meets the requirements of the SEA Directive. Haringey Council commenced the Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) of the Local Plan (formerly the Core Strategy) Development Plan Document (DPD) in 2007. The Local Plan will replace the current Unitary Development Plan adopted in 2006. The Local Plan sets out the spatial vision, spatial objectives and strategic policies for the development of the borough up to 2026 and provides the framework for all the other Local Development Documents. The SA process commenced with a Scoping Report (June 2007) (5000-LN00993-LNR-01). Following this, SA Reports as the Local Plan was

developed were produced to assess the Local Plan objectives, options and policies. These included the following: Preferred Options SA Report (2009) (5004-LN00993-LNR-04); the SA report on the Proposed Submission Local Plan (2010) (5005-LN00993-LNR-03) which was revised following changes to SP2 and SP12 (5005-LN00993-LNR-04) and the SA Report on the Submission Local Plan (2011) (5006-LN00993-LNR-01). The Examination in Public into the Local Plan was held in June to July 2011.

Following this, a revised consultation took place on the fundamental changes to the Local Plan: Strategic Policies (September-November 2011). In response to comments received from that consultation, the Inspector carried out an additional hearing to examine the issues raised in the revised consultation on 22 February 2012. Prior to this hearing, an update to the Council's Employment Land Study was produced. An Addendum SA (5008-LN00993-LNR-06) on Policy SP 8 Employment Land Designations was also produced. Consequently, a consultation on the updated Employment Land Study was carried out from 24th February to 9th March 2012. Following representations, a SA Erratum consisting of minor amendments was produced by the Council which did not change the conclusions of the Addendum SA.

After the publication of the National Planning Policy Framework (NPPF) (March 2012) and the Planning Policy for Traveller Sites, the Council produced a paper which outlined the way in which the Council considered the NPPF may affect the content of the Local Plan. Consultation was carried out from May to June 2012. An additional SA was not carried out since the Council considered the Local Plan to be consistent with the NPPF and only minor factual changes were carried out to the plan.

In August 2012, the Planning Inspector submitted main modifications to ensure the soundness of the Local Plan. Consultation was undertaken on the modifications in September to October 2012. The main modifications were needed to provide clarity, correct errors and factual updates and did not alter the overall principles of policy so that no further SA was required. The Inspector's Report was received on the 17th December 2012. The Council is formally adopting the Local Plan DPD on March 2013.

The following sections discuss the SA stages.

3.1.1 Scoping

The output of Stage A was a Scoping Report (5000-LN00993-LNR-01) (June 2007) which was a consultation vehicle to engage stakeholders at an early stage in the process.

The following tasks have been undertaken during this stage:

Task A1 - A review of relevant international, national, regional, sub regional and local programmes and plans that could have implications for the SA and the Local Plan.

A review of approximately 70 international, national, regional and local plans was undertaken. Crosscutting themes were identified from environmental enhancement to equality and health. We identified where these themes and objectives could be positively achieved through the Local Plan and the SA.

TASK A2 - The collation of relevant baseline environmental, social and economic data to gain a better understanding of the Borough.

This covered all of the baseline topics identified in the SEA Directive and further information regarding deprivation, crime and the economy. Baseline data collection for the borough was undertaken to identify issues and opportunities.

TASK A3 - The identification of potential environmental and sustainability issues and opportunities using the information collated during Tasks A1 and A2.

These issues included:

- Educational attainment is lowest in White Hart Lane, Northumberland Park and Seven Sisters. There is a need to improve educational attainment in the borough, including promoting lifelong learning and increased adult participation in education.
- Primary healthcare facilities, particularly in some areas of Tottenham, require modernisation.
- There are isolated pockets of health deprivation across the borough.
- Areas in the borough are at risk of flooding, specifically areas in proximity to Pymmes Brook on Pinkham way, the Mosselle Brook and the River Lee. These include parts of the Lee Valley and South Tottenham.
- Demand for water for drinking and washing per person has increased and a growing population has increased the demand for water.
- There are a number of contaminated sites across the borough and areas of brownfield land that need to be redeveloped.
- There is a need to improve air quality. Council declared the whole borough as an AQMA on July 2001.
- The Lee Valley Regional Park straddles the eastern boundary of the borough. The Lee Valley is also a Site of Special Scientific Interest. There are 60 Sites of Importance for Nature Conservation which should be protected.
- There are a large number of cultural heritage features across the borough that must be protected and enhanced including Listed Buildings, Areas of Archaeological Importance (AAIs), Registered Historic Parks and Gardens, Local Historic Green Spaces and Sites of Industrial Heritage Interest.
- The borough has 29 designated Conservation Areas, landscape and open areas which include: The Lee Valley Regional Park and Metropolitan Green Belt, Metropolitan Open Land and Significant Local Open Land and other areas of green spaces that need to be protected.
- There is a need to increase recycling of waste materials. 85,000 tonnes of waste are generated by Haringey's residents each year.
- The borough is well served by public transport such as bus and rail services. Approximately 54% of residents who travel to work by public transport. However, compared to inner London Boroughs, Haringey has the third lowest number of people who walk to work. This suggests that with little indigenous employment within the borough, residents commute to other areas to work.
- The borough has areas of high unemployment, such as Haringey Heartlands and Tottenham Hale.
- Crime rates are relatively high across the borough and incidences of crime and disorder are evenly spread across the borough. There is a particular need to tackle

anti-social behaviour, criminal damage and burglary in the borough and overall levels of crime to enhance overall quality of life.

- There are pockets of multiple deprivation in a number of wards (Tottenham Hale, Bruce Grove, White Hart Lane, Northumberland Park, Tottenham Green, Seven Sisters, Harringay and Noel Park) in the borough, particularly in the centre and east of the borough.
- There is a need to provide social rented housing. There is an overwhelming need for affordable housing, particularly for homeless households and those in temporary housing.

TASK A4 - Developing an appraisal framework comprising a series of Sustainability Appraisal Objectives against which the DPD options, allocations and policies will be assessed.

This is a key output of the scoping stage and the framework forms the methodological basis for assessing and improving the sustainability of the Local Plan. Initial SA objectives were identified and consulted on during scoping consultation.

The SA Scoping Report, which was the output for this stage, consisted of two parts. Part One of the Scoping Report relates to the Local Plan, providing generic scoping information that applies to all Development Plan Documents (DPD). Part Two consisted of separate chapters providing additional scoping information relevant to individual DPDs and Supplementary Planning Documents (SPDs), for example the Housing Supplementary Planning Document. The intention was to establish a sustainability appraisal framework that would include social, economic and environmental objectives that could be tailored for future Local Development Documents.

The SA Scoping Report was issued for public consultation in November 2007, for the statutory five week consultation period. The aim of this was to obtain comment and feedback upon the scope and level of detail of the SA.

The SA Scoping Report was issued to the three statutory consultees (the Environment Agency (EA), Natural England (NE) and English Heritage (EH)). In addition, the Scoping Report was issued to the Haringey Federation of Residents Association, neighbouring boroughs, the Greater London Authority, Friends of the Earth and other stakeholders for comment. A summary of responses is set out below.

The Environment Agency suggested environmental issues and opportunities that should be considered (flood risk, contaminated land, reduction of air emissions, water resources, access to all and sustainable urban drainage). The Environment Agency also recommended that enhancement of biodiversity, restoration of rivers and riverbanks within the borough should be addressed and to identify recreational importance of waterways. Other suggestions included: encouraging walking and cycling, locating developments around existing facilities and transport infrastructure and to build in water efficiency into new developments as well as provision for renewable energy developments in the borough.

English Heritage provided a list of additional information (guidance) which should be reviewed and considered in the SA process and suggested that consideration of the wider historic environment is taken into account when assessing future trends. English Heritage also recommended that the setting of heritage assets and contribution of the historic environment to help define local distinctiveness should be considered. Natural England recommended the adoption of its Access to Natural Green space Standards. Friends of the Earth suggested that energy efficiency needs to be built into regeneration and climate change is an important issue

that needs to be considered. Hyder Consulting subsequently incorporated responses into this SA Report where considered appropriate.

Following the SA consultation, the SA Objectives were finalised and the baseline updated. The revised SA Objectives are set out in Table 1-1.

Table 1-1 Final SA Framework Objectives

SA Objective		Sub-Objectives
1	To reduce crime, disorder and fear of crime.	To encourage safety by design.
		To reduce levels of crime.
		To reduce the fear of crime.
		To reduce levels of anti-social behaviour.
		To reduce alcohol and drug misuse.
2	To improve levels of educational attainment for all age groups and all sectors of society.	To increase levels of participation and attainment in education for all members of society.
		To improve the provision of, and access to, education and training facilities.
3	To improve physical and mental health for all and reduce health inequalities.	To improve access to health and social care services.
		To prolong life expectancy and improve well-being.
		To promote a network of quality, accessible open spaces.
		To promote healthy lifestyles.
4	To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents.	To reduce homelessness.
		To increase the availability of affordable housing.
		To improve the condition of Local Authority housing stock.
		To improve the diversity of the housing stock.
5	To protect and enhance community spirit and cohesion.	To promote a sense of, cultural identity, belonging and well-being.
		To develop opportunities for community involvement.
		To support strong relationships between people from different backgrounds and communities.
6	To improve access to services and amenities for all groups.	To improve access to cultural and leisure facilities.
		To maintain and improve access to essential services (banking, health and education) and facilities.
7	To encourage sustainable economic growth and business development across the Borough.	To retain existing local employment and create local employment opportunities.
		To diversify employment opportunities.
		To meet the needs of different sectors of the economy.
8	To develop the skills and training needed to establish and maintain a healthy labour pool.	To improve lifelong learning opportunities and work related training.
		To reduce high levels of unemployment and worklessness.
9	To encourage economic inclusion.	To improve physical accessibility to local and London-wide jobs.
		To support flexible working patterns.
		To encourage new businesses.

SA Objective		Sub-Objectives
10	To improve the vitality and vibrancy of town centres.	To enhance the environmental quality of the Borough's town centres.
		To promote the Borough's town centres as a place to live, work and visit.
		To ensure that the Borough's town centres are easily accessible and meet local needs and requirements.
		To promote high quality buildings and public realm.
11	To protect and enhance biodiversity.	To protect and enhance Priority Species and Habitats identified in the Biodiversity Action Plan.
		To link and enhance habitats and wildlife corridors.
		To provide opportunities for people to access wildlife and diverse open green spaces.
12	To protect and enhance the Borough's townscape and cultural heritage resources.	To promote townscape character and quality.
		To preserve or enhance buildings and areas of architectural and historic interest.
13	To protect and enhance the Borough's landscape resources.	To promote a network of quality, accessible open spaces.
14	To protect and enhance the quality of water features and resources.	To preserve ground and surface water quality.
		To conserve water resources.
15	To encourage the use of previously developed land.	To encourage the development and remediation of brownfield land.
		To promote the efficient and effective use of land whilst minimising environmental impacts.
16	To adapt to climate change.	To reduce and manage flood risk.
		To encourage 'green design' solutions.
		To encourage the inclusion of SuDS in new development.
17	To protect and improve air quality.	To manage air quality within the Borough.
		To encourage businesses to produce travel plans.
18	To limit climate change by reducing CO ₂ emissions.	To reduce the use of energy.
		To increase energy efficiency and support affordable warmth initiatives.
		To increase the use of renewable energy.
19	To ensure the sustainable use of natural resources.	To reduce the consumption of raw materials (particularly those from finite or unsustainable sources).
		To encourage the re-use of goods.
		To reduce the production of waste.
		To support the use of sustainable materials and construction methods.

SA Objective		Sub-Objectives
		To increase the proportion of waste recycling and composting across all sectors.
20	To promote the use of sustainable modes of transport.	To improve the amenity and connectivity of walking and cycling routes.
		To promote the use of public transport.
		To reduce the use of the private car.

3.1.2 Developing and Refining Options and Assessing the Effects

Task B1: Test the plan objectives against the SA framework.

The compatibility of the Local Plan Objectives and the SA Objectives was tested as part of the SA process. The results of the assessment are presented in the Assessment of Preferred Options Report (Report no: 5004-LN00993-LNR-04).

Task B2: Develop the plan options.

Following the SA Scoping Report, a broad range of Issues and Options were drafted. Haringey's Local Plan Issues and Options Report (December 2007), presented five spatial objectives for the plan, and set out 78 questions for consideration which addressed the key challenges identified for the borough over a 15 year period. The Issues and Options were consulted on in February/March 2008. The methodology for carrying out the Sustainability Appraisal, as proposed at the Scoping stage, was used to test each of the objectives in the Issues and Options document and predict their significant positive and negative impacts on the SA Objectives

In response to the comments received in relation to the five spatial objectives, four broad spatial options for the future development of the borough were identified. These options represented alternative strategies for achieving the Council's vision for Haringey.

This stage of the SA assessed the strategy options and provided recommendations to improve their sustainability. Initially, the SA assessed the strategy options:

- Option A: A borough wide approach focusing on identified areas of change;
- Option B: East/Central/West Spatial Approach;
- Option C: Housing Led Growth;
- Option D: Economic Regeneration through Employment Growth; and
- Option E: Market Driven approach.

The five options above were then subject to an initial sustainability appraisal to identify which options had addressed the SA Objectives well (Options Discussion Paper – Initial Sustainability Options Appraisal (October 2008). This appraisal identified which option was the most sustainable in terms of being the most appropriate strategy for the borough over a 15 year period, taking into account the range of effects (both negative and positive) on the environment, as well as the positive effects of development in terms of economic benefits and social well-being.

A detailed assessment of the options was undertaken as the options were further developed. The appraisal found that Options A-D may have indirect effects on the improvement of safety and crime and vitality of town centres. Options A and B were appraised as the more sustainable options that are likely to result in balanced development. Option C was assessed as sustainable in terms of economic SA Objectives and Option D does not address housing needs. Option E was the least sustainable since development would be ad-hoc and therefore opportunities for enhancement and mitigation are limited. The findings of the options assessment is also discussed in Section 4 of this report. The assessment matrices and further details of this assessment are provided in Section 6.3 of the Assessment of Preferred Options Report (5004-LN00993-LNR-04) (July 2009).

Following this appraisal, discussions with the Local Development Framework Members Advisory Group, feedback from the Issues and Options consultation and other key partners including Haringey's Strategic Partnership (HSP), a combination of Options A and B was agreed as the preferred spatial approach and the most appropriate to shape the development of Haringey up to 2026.

The Local Plan Preferred Spatial Approach was that:

“New development will be focused throughout the borough in the identified areas of change and at other sustainable locations while recognising the various characteristics of the borough”.

The preferred spatial approach formed the next stage of the development of the Local Plan and the Council published the “A New Plan for Haringey 2011 – 2026” in May 2009. The New Plan for Haringey set out the vision, objectives, preferred policy options (and discounted policy alternatives) required to deliver the preferred spatial strategy for the borough. The 12 Strategic Policies (SP) put forward were considered to be the most appropriate in addressing the key challenges facing the future development of Haringey. The overall approach to managing growth was set out in SP1. The aim of this policy was to focus growth in the identified areas of change so that it meets the needs for homes, jobs and services, is supported by necessary infrastructure and maximises the benefits for the local area and borough as a whole.

Task B3: Predict the effects of the plan, including plan options.

Task B4: Evaluate the effects of the plan.

Tasks B3 and B4 were undertaken to assess the preferred strategy and alternative policy options necessary to deliver the agreed preferred spatial approach. The findings were presented in Section 6 of the Preferred Options SA Report (5004-LN00993-LNR-04) and a summary of the appraisal is outlined below.

Appraisal of the preferred strategy

The overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near transportation hubs, and support appropriate development at other accessible locations, with more limited change elsewhere. The assessment recorded that the preferred option scored positively against the social and economic objectives such as housing, crime reduction, community cohesion, access to services and amenities, employment, health, economy, vibrancy of town centres, biodiversity, landscape and transport but there were potential negative impacts identified. This included increase in water use and energy, potential increase in flooding and use of natural resources. There were uncertain impacts on climate change and air quality.

The New Plan for Haringey and the accompanying SA were consulted on from 5th May until 30th June 2009. Regarding the SA, there were comments on the baseline and the Highways Agency requested the inclusion of an additional traffic-related indicator to Sustainability Objective 20: Proportion of trips made by non-car modes. This objective was incorporated into the SA Framework.

Following the changes to the Local Plan as a result of the consultations, a Proposed Submission Local Plan was produced by the Council in May 2010. SP1 Managing Growth was further refined so that it addressed three approaches to development with areas of high, medium and low growth, properly reflecting the different characteristics of the borough. Other changes included a new policy addressing the needs of Gypsies and Travellers, the Environment policy separated into three new policies dealing with Low Carbon, Water and Flooding, and Waste.

Appraisal of Policy Options

The appraisal of the policy options was undertaken against the SA Objectives. The details of the appraisal can be found in Section 5 the SA Report (5005-LN00993-LNR-04). In general, the policies have performed well against social, economic and environmental SA Objectives. The introduction of new policies (SP4 (Towards a Low Carbon Haringey) and SP5 (Water Management and Flooding and SP6 (Waste and Recycling) has improved sustainability performance, particularly against environmental objectives relating to energy use, water management and flooding and waste. Equality with regard to services and facilities has also improved. The focus of the Local Plan in SP1 (Managing Growth) and SP2 (Housing) is on the growth areas. However, SP1 also addresses development in other areas (primarily residential and in the western part of the borough) and so there is now a more balanced approach in the Local Plan.

Most of the policies addressed social objectives well, but there are uncertainties relating to SA Objective 9 (Economic Inclusion) and SA Objective 5 (Community Spirit and Cohesion). Policies SP2 (Housing), SP8 (Employment) and SP16 (Community Infrastructure) seek to provide training programmes and employment opportunities but economic inclusion can only happen through employment, which would depend on a number of factors – availability of opportunities, suitability of skills to employment opportunities. Again, although several policies are likely to contribute to SA Objective 5 by improving the image of the borough (SP11 (Design) and SP12 (Conservation)) and providing venues for engagement SP15 (Culture and Leisure) and SP16 (Community Infrastructure)), community cohesion would depend on a number of factors, such as pride in the community and social inclusion.

Potential negative effects have been identified against some of the SA Objectives relating to water consumption, climate change and air quality. While there are a number of measures proposed within the policies to address those effects, it will only be through the stringent application of the policies in decision-making that environmental impacts will be avoided. Furthermore, the focus should always be upon encouraging developers to deliver benefits and seeking to achieve targets set in the Code for Sustainable Homes and BREEAM.

How the policies addressed the SA Objectives is set out below:

- The majority of the policies are likely to contribute to the following objectives (eight or more positive effects):
 - SA1 – To reduce crime.
 - SA4 – To provide greater choice, quality and diversity of housing.
 - SA5 – To protect and enhance community cohesion.

- SA6 – To improve access to services and amenities.
- SA7 – To encourage sustainable economic growth and business development across the borough.
- SA10 – To improve the vitality and vibrancy of town centres.
- SA12 – To protect and enhance the borough's townscape and cultural heritage resources.
- SA13 – To protect the borough's landscape resources.
- SA15 – To encourage the use of previously developed land.
- A number of policies have potential to have adverse effects on the following objectives (four or more negative effects):
 - SA14 – To protect and enhance the quality of water features and resources.
 - SA16 – To adapt to climate change.
 - SA18 – To limit climate change by reducing CO₂ emissions.
 - SA19 – To ensure sustainable use of resources.
- Some policies had both positive and negative effects on the following objectives (two or more):
 - SA1 – To reduce crime.
 - SA3 – To improve physical and mental health for all and reduce health inequalities.
 - SA12 – To protect and enhance the borough's townscape and cultural heritage resources.
 - SA17 – To protect and improve air quality
 - SA20 – To promote the use of sustainable modes of transport.

The strategic policies that performed well against all SA objectives (eight or more positive impacts are: SP1 (Managing Growth), SP2 (Housing), SP4 (Working towards a Low Carbon Haringey), SP5 (Water Management and Flooding), SP10 (Town Centres), SP11 (Design), SP13 (Open Space and Biodiversity), SP14 (Health and Well-Being) and SP17 (Delivering and Monitoring)).

The policies with the most adverse impacts (four or more negative impacts) are; SP1 (Managing Growth), SP3 (Gypsy and Travellers) and SP8 (Employment). The last two policies had the most potential for negative impacts. Adverse impacts mainly related to environmental objectives.

The SA Report (Ref: 5005-LN00993-LNR-03) and the Proposed Submission Local Plan were consulted on from May to June 2010. A number of minor changes were proposed to the Local Plan following this consultation and these were also subject to a sustainability appraisal, prior to submission. Some of these changes included a revised SP12 Conservation to reflect new PPS5, changes to text on climate change and details relating to the location of tall buildings. The SA findings demonstrated that the changes to the policies did not have a significant effect on the social, economic and environmental objectives of the sustainability framework. Again, the SA results demonstrated that these changes did not have a significant effect on the SA objectives.

Following the consultation and further evidence on housing viability, SP2 Housing was amended. Likewise, SP12 has also been amended to reflect the new PPS5 on Conservation. An updated SA Report (5005-LN00993-LNR-04) presented the revised SA, taking into

consideration the amendments to SP2 and SP12. The SA findings showed that the changes did not have a significant effect on the SA Objectives.

Following this appraisal, the preferred policy options were developed for the Submission Local Plan. The SA Report (5006:-N0093-LNR-01) assessed the preferred policy options and the findings are set out in Section 5 of that report. A summary of the findings are set out below.

The policies under People at the Heart of Change: SP1 (Managing Growth), SP2 (Housing) and SP 3 (Gypsies and Travellers) have both positive and negative effects on the SA Objectives. While the majority of effects arising from these policies are likely to be positive, there is still potential for some significant negative effects. These effects are likely to result from the scale of development being proposed. Policy SP1, which sets out the level of growth in the borough, is likely to have the most negative effects. These effects are particularly on the environmental objectives, caused by the construction and operation of the new developments proposed. These include increased resource use, energy and water consumption, air and noise pollution, traffic and congestion.

Policy SP2 will also have negative effects due to the level of housing development planned. Potential negative effects from these policies, as a result of the level of development and increase in population, include:

- Increase in resource use, energy and water consumption, emissions and waste generation. The level of growth proposed will result in an approximate 15% increase in population by 2026. While the Local Plan and the Development Management DPD will seek to mitigate this by including policies to minimise water and energy use, waste production, emissions from transport and energy generation, there will still be net increase.
- Increase in noise pollution and nuisance from construction activities, increased traffic and high density development. Other policies seek to address these, such as the SP11 on Design and policies on sustainable construction; and SP7 on transport, which promotes the use of public transport, walking and cycling.
- Increase in traffic and congestion and pollution. Other policies seek to address these through promoting walking and cycling and concentrating housing, employment and retail in growth areas, which should reduce the need to travel.

Under the Key Objective – An Environmentally Sustainable Future there are four policies (SP4 (Working towards a Low Carbon Haringey, SP5 (Water Management and Flooding), SP6 (Waste and Recycling) and SP7 (Transport) which aim to deliver a sustainable environment by requiring developments to meet standards relating to energy, water management, waste and transport. These policies perform very well against the sustainability objectives and the effects are likely to be mostly positive, with a limited number of likely negative effects. The key potentially positive effects of these policies include the following:

- Ensuring new developments adapt to the potential impacts of climate change and do not make it worse in the future. This includes the identification of mechanisms to meet energy and carbon emission targets, reducing the need to travel, minimising flood risk and promoting sustainable urban drainage and waste management.
- Improved health as a result of enhanced environmental quality, easy access to open spaces and promotion of walking and cycling.
- Requirements for sustainable design and construction and sustainable waste management to minimise consumption of materials and resources, waste generation and

pollution and promote energy efficiency, renewable energy, recycling and water conservation.

- Integration of public transport and infrastructure into planning and development proposals and reducing the need to travel in order to minimise air pollution and congestion which could result from new development.

The majority of the effects of these policies are positive but there may be negative impacts, which include:

- Temporary local environmental impacts, such as noise, dust and disturbance relating to infrastructure to be developed (e.g heat and energy facilities, waste management facilities) under Policy SP4 (Working towards a Low Carbon Haringey), SP6 (Waste and Recycling) and SP7 (Transport).

Under the Economic Vitality and Prosperity shared by all key objective, there are three policies: SP 8 (Employment) SP 9 (Improving Skills) and SP (10) Town Centres. Under this key objective are four policies which aim to deliver a sustainable environment by requiring developments to meet standards relating to energy, water management, waste and transport. These policies perform very well against the sustainability objectives and the effects are likely to be mostly positive, with a limited number of likely negative effects. The key potentially positive effects of these policies include the following:

- Ensuring new developments adapt to the potential impacts of climate change and do not make it worse in the future. This includes the identification of mechanisms to meet energy and carbon emission targets, reducing the need to travel, minimising flood risk and promoting sustainable urban drainage and waste management.
- Improved health as a result of enhanced environmental quality, easy access to open spaces and promotion of walking and cycling.
- Requirements for sustainable design and construction and sustainable waste management to minimise consumption of materials and resources, waste generation and pollution and promote energy efficiency, renewable energy, recycling and water conservation.
- Integration of public transport and infrastructure into planning and development proposals and reducing the need to travel in order to minimise air pollution and congestion which could result from new development.

The majority of the effects of these policies are positive but there may be negative impacts, which include:

- Temporary local environmental impacts, such as noise, dust and disturbance relating to infrastructure to be developed (e.g heat and energy facilities, waste management facilities) under Policy SP4 (Working towards a Low Carbon Haringey), SP6 (Waste and Recycling) and SP7 (Transport).

Under the Key Objective Safer for All are three Policies: SP11(Design), SP 12 (Conservation) and SP 13 (Open Space and Biodiversity). These policies under this key objective have the potential to deliver a quality environment. The policies cover aspects including: design; conservation; and open space and biodiversity.

The key potential positive sustainability effects arising from *Safer for all* policies include:

- Enhanced public realm, townscape and landscape, particularly in areas such as Tottenham Hale and Seven Sisters, where environmental quality is low.
- Improved health as a result of greater provision and improved access to open spaces through the green infrastructure.
- Conserve and enhance biodiversity through improving open spaces and provision of green and brown roofs in new developments.
- Reduction in crime and fear of crime by promoting 'Secure by Design' in new developments.
- Improved performance of new developments including pollution prevention, sustainable design and construction.

The key potential negative effects from *Safer for all* policies include:

- Potential to restrict availability of land for residential, industrial and commercial uses by providing new open spaces and protecting existing ones.
- Local environmental impacts (e.g. dust, noise, traffic) which could result from developments in Conservation Areas.

Under the key objective Healthier People with a Better Quality of Life, there are four policies: SP 14 (Health and Wellbeing), SP15 (Culture and Leisure), SP 16 (Community Infrastructure), SP17 (Delivering and Monitoring the Plan). The policies under this key objective of *Healthier people with a better quality of life* aims to deliver the facilities and infrastructure to improve health and well being in Haringey. The health, culture and community infrastructure policies are generally positive policies. Policy SP17 provides the mechanisms to deliver improvements and infrastructure.

The key positive sustainability effects arising from the *Healthier people with better quality of life* policies include:

- Improved health as a result of greater provision of health, community, sports and leisure and cultural facilities, particularly in areas of deficiency.
- Improvement in training facilities, which could lead to better employment opportunities.
- Greater community cohesion through development of cultural quarters and provision and improvement of community facilities, particularly in deprived areas.

The key negative effects arising from the Healthier people with better quality of life policies include:

- Local environmental effects (noise, dust, disturbance) arising from development of community infrastructure.
- Potentially restricting the availability of land for residential, industrial and commercial use by developing community facilities (health, education and cultural).

The Proposed Submission Local Plan and the SA Report were issued for additional Regulation 27 consultation from 25th October to 22nd November 2010 to recognise policy changes to affordable housing threshold and employment land designations.

Task B5: Consider ways to mitigate adverse effects and maximise beneficial ones.

The mitigation measures in SA refer to any approach which is aimed at avoiding, preventing, reducing or compensating for significant adverse impacts on the SA Objectives. Mitigation measures also include enhancement of positive effects, where appropriate.

Specific mitigation measures to address potential impacts on SA Objectives included the following:

- Sustainability measures refer mostly to new developments; policies should apply the principles/measures more widely, to include refurbishments and redevelopments. SP4 (Working towards a Low Carbon Haringey) policy specifies targets for meeting Code for Sustainable Homes for new developments. Targets for housing refurbishments or redevelopments should also be specified. Although SP4 refers to reducing energy with regard to retrofitting existing housing stock, more specific information on how this would be achieved should be provided. Measures to reduce space heating, lighting, cooking and other energy use for redevelopments and targets could be included in this policy. The potential for renewable energy schemes utilising technologies such as solar panels, biomass heating, photovoltaic cells and combined heat and power schemes can be incorporated both into new developments and existing buildings.
- Promote sustainable use of resources and sustainable construction within policies SP1, SP2 and SP8.
- Incorporate flood risk considerations into SP1, particularly relating to Tottenham Hale.

Task B6: Propose measures to monitor the significant effects of implementing the plan.

The SA/SEA process is an iterative process, so its success and effectiveness will be monitored by the continuing collection of baseline data according to the identified indicators. Monitoring should be undertaken where significant effects of the strategic policies were predicted through the SA. Monitoring could be undertaken as part of LBH's existing monitoring, which should also use an objectives and targets led approach. A draft monitoring framework was developed as part of the SA process.

3.1.3 Preparation of the SA Report

Following the consultation on the Proposed Submission Local Plan and Proposed Submission SA Report, a final SA Report (5006-LN00993-LNR-01) (February 2011) was prepared for Submission, which showed no significant effects against SA Objectives.

The SA Report on the likely significant sustainability effects of the Local Plan presented:

- The plan's likely significant sustainability effects which considered the effects of options and policies;
- Measures envisaged for the prevention, reduction and offsetting of any significant adverse effects; and
- Monitoring measures to ensure that any unforeseen sustainability effects are identified, allowing for appropriate remedial action to be taken.

The monitoring framework was finalised is presented in Section 5.6 of the Final SA Report (Report No: 5006-LN00993-LNR-01) (February 2011). The monitoring framework is further discussed in Section 5 of this report.

3.1.4 Consultation on the Proposed Submission Local Plan and SA Report

Task D1: Consulting the public and consultation bodies

The Proposed Submission Local Plan and the SA Report (5004-LN00993-LNR-04) were published for final consultation in May to June 2010 to allow the statutory consultees and the public to comment on the plan and the SA. Following this consultation, a further Regulation 27 consultation on the changes to SP2 and SP12 was undertaken in October/November 2010.

Task D2 (i) and (ii) Appraise significant changes resulting from representations

Following consultation in May to June 2010, there were revisions to the Affordable Housing and Conservation policies. As a result, changes were made to Policies SP2 Housing and SP12 Conservation. These changes were assessed and the SA Report (50005-LN00993-LNR-04) was produced. This SA assessed the changes and concluded that there were no significant effects.

An additional Regulation 27 Consultation was undertaken in November to December 2010. The representations from this consultation were taken into account in the preparation of the Submission Local Plan. The SA on the Submission Local Plan (5006-LN009930-LNR-04) was produced in February 2011. This assessed the significant changes resulting from the representations and the findings set out in the section below. The SA Report assessed policy changes, which showed no significant effects.

3.1.5 Examination in Public

Employment Designations Report and SA Addendum

Following the Examination in Public in June/July 2011, the Council prepared an Employment Designations Report. A SA Addendum Report (5008-LN00993-LNR-01) (September 2011) was produced, which re-assessed SP8 in light of the Inspector's letter and additional information on the designations of employment sites.

The overall effects of Policy SP8 are positive. There is emphasis on protection and expansion of employment and business opportunities, which is beneficial for a borough with high unemployment rates. The protection of sites would encourage more sustained economic activity. Increase in employment would indirectly contribute to reduction in crime, health inequalities and could improve mental wellbeing for some residents. The key potential positive effects arising from this policy include:

- Emphasis on supporting local employment training schemes and local enterprise development.
- Reducing exclusion and deprivation by providing suitable employment opportunities for local people through a vibrant local economy.
- Protecting existing employment land uses is likely to ease pressure on greenfield sites for employment development.

- Environmental and local amenity improvements through modernisation of old stock, reuse/redevelopment of obsolete industrial sites to alternative uses.
- Encouragement of a variety of uses within the employment areas for industrial occupiers including walk to services such as crèches and cafes which will provide support for workers and local community.
- Focusing employment within land currently used for this purpose and on brownfield sites will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, while potentially bringing about some localised improvements to townscape where redevelopment occurs.

While there are potential positive effects from this policy, there are also key potentially negative sustainability effects which include:

- Some industrial sites may have localised environmental impacts and distribution uses may generate freight/lorry traffic which will generate road traffic, air pollution and noise.
- There is potential for increased water consumption and pollution by business and industrial land use.
- Increased business and office developments have potential to increase energy use.
- 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 in the site therefore has potential to have biodiversity impacts.

There were uncertainties recorded in the appraisal against SA objectives relating to air quality and climate change adaptation. Development would bring about some increase in greenhouse emissions from developments and traffic movements even when new development is itself energy efficient. This therefore gives rise to some uncertainty regarding the extent to which gas emissions can be reduced overall.

Where negative or uncertain impacts have been recorded, mitigation measures have been identified. The detailed appraisal matrices are presented in the Appendix of the Addendum Report. The SA proposed recommendations to mitigate potential impacts and to enhance the employment land designations:

1. Any new development should be in accordance with the full range of the Council planning policies and objectives.
2. Implement Secured by Design requirements for new developments within the DEAs.
3. Where possible employment opportunities should be made for local people.
4. It is recommended that legal agreements put in place to provide contributions towards employment and training initiatives for staff and the community (for example through work experience or apprenticeships) where appropriate.
5. Corporate Social Responsibility programmes are becoming increasingly popular to maintain strong relationships with the local community, and there may be potential for new investors within employment areas to build strong community links.
6. Any environmental effects of detailed proposals are to be considered as part of EIA, a Landscape Design Strategy and a Low Water Strategy as supporting information at planning application stage, incorporating as a minimum townscape, biodiversity, air quality, water resources and quality, flood risk, drainage, traffic impacts and resource efficiency.
7. New development within the employment sites should always consider opportunities to enhance biodiversity and generally contribute to creating a good quality and greener place to work.

8. Regard should be had to other policies within the Local Plan, including SP4 – Working towards a Low Carbon Haringey, SP 5 - Water Management and Flooding, SP13 -Open Space and Biodiversity and SP7 - Transport.
9. Development should attempt to use the local rail network for any distribution/delivery requirements where feasible. The use of local transport links for staff travel to work should also be encouraged through travel plans and other incentives where possible.
10. Site Waste Management should be a consideration during planning applications to ensure construction seeks to minimise waste and maximise resource efficiency
11. Sustainable modes of transport should be a key consideration with any major regeneration of the DEA sites

The following recommendations have been made in addition to the general recommendations specifically for the Friern Barnet site:

12. The Friern Barnet site has dual designation as discussed above. Any development should be undertaken with appropriate consideration for the ecology present. Mitigation such as translocation, design to avoid sensitive areas or creation of new habitat within another location in the borough may be necessary to ensure that the area can function whilst maintaining overall net balance of biodiversity in the borough.
13. Enhancement should form part of proposals and mitigation should be required to seek no net loss of biodiversity, whilst improving any areas of potential contamination.
14. Any effects of detailed proposals should be considered as part of EIA and Landscape Design Strategy with supporting information at planning application stage. It should be ensured that developments are checked for biodiversity potential and appropriate mitigation developed.

Following representations to the Addendum SA, the Council produced an Erratum to the Sustainability Appraisal covering minor modifications, which did not change the conclusions of the SA and found that overall, the policy has beneficial effect against the SA Objectives.

Following the consultation a further Examination in Public was held in February 2012.

Consultation on the NPPF and Planning Policy for Traveller Sites

The Council produced a Topic Paper which outlined the way the Council considered the NPPF's effect on the content of the Local Plan and a six week consultation period was carried out to provide stakeholders with an opportunity to comment on the document. In view of the new requirements identified in the NPPF, the Council considered it beneficial to include a new specific policy on the presumption in favour of sustainable development. This reflects paragraph 14 of the NPPF. SP0 states that where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise. An additional SA was not carried out as the Council considered the Local Plan to be consistent with the NPPF and only minor factual changes were carried out to the plan. These changes did not need a further SA.

Consultation on the Inspector's Minor Modifications

This consultation provided those who made representations on the Local Plan opportunity to comment on the Inspector's table of Main Modifications on September to October 2012. The main modifications were needed to provide clarity, correct errors and factual updates. The modifications did not alter the overall principles of the policy so a further SA was not required.

In parallel to the SA process, a Habitats Regulations Screening (HRA) Report was produced assessing the potential for the Local Plan to significantly affect the integrity of the European

Designated Sites. The results of this process were documented in a separate report (5002-LN00993- LNR- 03). There were no significant impacts identified in the HRA Screening.

4 Reasons for choosing the document as adopted in the light of other reasonable alternatives

The Environmental Assessment of Plans and Regulations 2004 (12) (2) requires environmental reports to examine reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme. This statement is required to set out the reasons for choosing the plan or programme as adopted in the light of reasonable alternatives considered.

The sustainability objectives identified as part of the SA/SEA process were used to test a number of different alternative options that could potentially have been included in the Local Plan. Alternative strategies and policies were assessed and the assessments can be found in the SA Report (5005-LN00993-LNR-04). There were four options proposed: Options A, B, C, D and E as set out in Section 3.1.2 of this report. A summary of the findings of the options are discussed in Section 3.1.2. However, further detail on the assessment of the most sustainable options (A and B) is set out below.

Option A

Option A performed well against most of the SA Objectives. Concentrating development in areas of change likely to undergo regeneration (Tottenham Hale, Northumberland Park, Central Leaside, Seven Sisters and Haringey Heartlands), this option provides opportunities to provide new housing and employment opportunities, This Option promotes the development of sustainable modes of transport and protection of all open spaces which could have indirect benefits on health, particularly as these areas are within the bottom 25% for health deprivation and disability (Index of Multiple Deprivation). A weakness of this Option is that it was focussed on providing housing when there is a need to increase employment in the borough, particularly in the areas of regeneration. Locating high density housing in areas of change risks that there may not be enough capacity in existing services to accommodate new residents.

Option B

Option B performed well against many of the SA Objectives because it focuses on the needs of individual areas of the borough. SA Objectives relating to housing and employment would be addressed through regeneration initiatives in the eastern part of the borough (Northumberland Park, Tottenham Hale and Seven Sisters), where deprivation is concentrated. SA Objectives relating to housing, employment and town centres would be addressed in the central part (Haringey Heartlands and Wood Green) where there are pockets of deprivation and opportunities for improvement of environmental assets and open spaces. In the Western Haringey, which is predominantly residential with Conservation Areas, this Option will contribute to SA Objectives relating to conservation, landscape and townscape. This Option can focus on the level of community facilities needed, the type and number of housing developments, suitable employment opportunities in each area rather than adopting a borough-wide approach. It can specify levels of open space in developments to address open space deficiency in that area.

There is a potential, however, to focus narrowly on each area's needs and not consider the inter-relationships between the areas and the services that each area could provide for those in other parts of the borough. Some issues, such as climate change, energy use or water use

need borough-wide policies. Also, the borough's townscape and landscape resources need to be considered at the borough level.

Options A and B were found to be the most sustainable options and more likely to result in a balanced development. As discussed in Section 3.1.2 of this report, the SA findings, in addition to the inputs from key partners informed the selection of the preferred option. The results of this assessment work helped inform the decision as to which option should be included in the Local Plan.

Assessments of policy options are included in the SA Report (Ref: 5006-LN00993-LNR-01). A number of options were presented for each policy and the options were tested against the SA Objectives. The process is documented in the SA Report (5006-LN00993-LNR-01) of the Submission Local Plan, including the reasons for scoping out alternative options.

In general, the preferred policies have performed well against social, economic and environmental SA Objectives. The introduction of new policies SP4 (Towards a Low Carbon Haringey) and SP5 (Water Management and Flooding) and SP6 (Waste and Recycling) has improved sustainability performance, particularly against environmental objectives relating to energy use, water management and flooding and waste. Equality with regard to services and facilities has also improved. The focus of SP1 (Managing Growth) and SP2 (Housing) is on the growth areas. However, SP1 also addresses development in other areas (primarily residential and in the western part of the borough) and so there is now a more balanced approach in the Local Plan.

Most of the policies address social objectives well, but there are uncertainties relating to SA Objective 9 (Economic Inclusion) and SA Objective 5 (Community Spirit and Cohesion). Policies SP2, SP8 and SP16 (Community Infrastructure) seek to provide training programmes and employment opportunities but economic inclusion can only happen through employment, which would depend on a number of factors – availability of opportunities, suitability of skills to employment opportunities. Again, although several policies are likely to contribute to SA Objective 5 by improving the image of the borough (SP11 (Design) and SP12 (Conservation)) and providing venues for engagement SP15 (Culture and Leisure) and SP16 (Community Infrastructure), community cohesion would depend on a number of factors, such as pride in the community and social inclusion.

Potential negative effects have been identified against some of the SA Objectives relating to water consumption, climate change and air quality. While there are a number of measures proposed within the policies to address those effects, it will only be through the stringent application of the policies in decision-making that environmental impacts will be avoided. Furthermore, the focus should always be upon encouraging developers to deliver benefits and seeking to achieve targets set in the Code for Sustainable Homes and BREEAM.

The majority of the policies are likely to contribute to the following objectives:

- SA1 – To reduce crime.
- SA4 – To provide greater choice, quality and diversity of housing.
- SA5 – To protect and enhance community cohesion.
- SA6 – To improve access to services and amenities.
- SA7 – To encourage sustainable economic growth and business development across the borough.

- SA10 – To improve the vitality and vibrancy of town centres.
- SA12 – To protect and enhance the borough's townscape and cultural heritage resources.
- SA13 – To protect the borough's landscape resources.
- SA15 – To encourage the use of previously developed land.

A number of policies have potential to have adverse effects on the following objectives:

- SA14 – To protect and enhance the quality of water features and resources.
- SA16 – To adapt to climate change.
- SA18 – To limit climate change by reducing CO2 emissions.
- SA19 – To ensure sustainable use of resources.

Some policies had both positive and negative effects on the following objectives:

- SA1 – To reduce crime.
- SA3 – To improve physical and mental health for all and reduce health inequalities.
- SA12 – To protect and enhance the borough's townscape and cultural heritage resources.
- SA17 – To protect and improve air quality
- SA20 – To promote the use of sustainable modes of transport.

The strategic policies that performed well against all SA objectives are: SP1 (Managing Growth), SP2 (Housing), SP4 (Working towards a Low Carbon Haringey), SP5 (Water Management and Flooding), SP10 (Town Centres), SP11 (Design), SP13 (Open Space and Biodiversity), SP14 (Health and Well-Being) and SP17 (Delivering and Monitoring)).

The policies with the most adverse impacts are; SP1 (Managing Growth), SP3 (Gypsy and Travellers) and SP8 (Employment). The last two policies had the most potential for negative impacts. Adverse impacts were mainly related to environmental objectives and mitigation measures were proposed to reduce environmental impacts.

Through the iterative process of the SA and the Local Plan development, these findings helped inform the selection of the preferred policies. Suggestions included incorporation of measures to improve sustainability performance, such as incorporating Sustainable Urban Drainage (SuDs) in proposed developments, and requiring developments to meet Code for Sustainable Homes and BREEAM standards.

5 Measures that are to be taken to Monitor Significant Environmental Effects of the Implementation of the Local Plan

Monitoring is a legal requirement of the SEA Directive which states that “*Member States shall monitor the significant environmental effects of the implementation of plans and programmes in order, inter alia, to identify at an early stage unforeseen adverse effects, and to be able to undertake appropriate remedial action*” (Article 10.1). The Environmental Report shall include “*a description of the envisaged concerning monitoring*” (Annex I (i)).

A monitoring framework and indicators are presented in the Final SA Report (5006-00993-LNR-01) and discussed in Section 3.1.2 of this report.

The effect of the Local Plan on Sustainability Objectives identified in the SA should be monitored on an annual basis. The results of this monitoring will be included in the Annual Monitoring Report on the Local Plan. The results will feed into subsequent reviews of the Local Plan and will also ensure that any unforeseen effects can be acted upon quickly.

The SEA Directive does not require that the Local Plan is modified if monitoring reveals adverse effects. However, the intention of this process is to reduce significant adverse effects from the plan making and implementation process and so remedial measures should be implemented as appropriate. To gain maximum benefit from the process, Haringey Council need to determine when remedial action would be implemented, i.e. what would be the trigger and the type of remedial action that might be implemented, for example, the modification of a policy or the introduction of a new policy.

6 Conclusions

This Post-Adoption Statement has been prepared as part of the SA process applied to the Haringey Local Plan. The SA has been an important element of the Local Plan’s development and has informed different aspects of the plan making process as detailed within this statement.

The SA process has also successfully engaged with the statutory consultees so that they were able to actively influence the scope and direction of the SA. The SA process positively influenced the development of the Local Plan, which will ensure that the Local Plan will emerge as an exemplar of good sustainable development, benefitting the residents of Haringey in the long term as well as enhancing the environment. It also provides a sound basis for other DPDs.

The Inspector’s Report (December 2012) concludes that the Sustainability Appraisal is adequate. Specifically, the report also refers to the strategic thrust of the Local Plan being in accordance with the London Plan, based upon a credible evidence base and “including the SA, which refers to the due consideration of alternatives” (paragraph 14, page 5).