

London Borough of Haringey Pre-submission Core Strategy Sustainability Appraisal

Main Report



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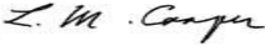
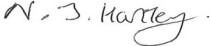



London Borough of Haringey

Pre-submission Core Strategy

Sustainability Appraisal

Main Report

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ABBREVIATIONS

AQMA	Air Quality Management Area
AAI	Areas of Archaeological Importance
AAP	Area Action Plan
BAP	Biodiversity Action Plan
BREEAM	British Research Establishment Environmental Assessment Method
CABE	Commission for Architecture and the Built Environment
CHD	Coronary Heart Disease
CO ₂	Carbon Dioxide
DCLG	Department for Communities and Local Government
DfT	Department for Transport
DPD	Development Plan Documents
EA	Environment Agency
EC	European Commission
EH	English Heritage
EU	European Union
GCSE	General Certificate of Secondary Education
ICT	Information and Communication Technology
IMD	Index of Multiple Deprivation
ktpa	kilo tonnes per annum
LBH	London Borough of Haringey
LDA	London Development Agency
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
NASS	National Asylum Support Service
NE	Natural England
NLSA	North London Strategic Alliance
NO ₂	Nitrogen Dioxide
NVQ	National Vocational Qualification
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PM ₁₀	Particulate Matter
PPG	Planning Policy Guidance
PPPs	Policies, Plans and Programmes

PPS	Planning Policy Statement
RQO	River Quality Objective
RSS	Regional Spatial Strategy
SA	Sustainability Appraisal
SEA	Strategic Environmental Assessment
SOA	Super Output Areas
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
TNO	Total Notable Offences
UDP	Unitary Development Plan
VAT	Value Added Tax

1 INTRODUCTION

1.1 Background

The London Borough of Haringey (LBH) is currently preparing its Local Development Framework (LDF) which will replace the existing Unitary Development Plan 2006 (UDP). As part of this process, a combined Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) are being undertaken. The term, SA, shall be used to refer to the combined SA/SEA for the remainder of this SA Report.

The LDF comprises a suite of Development Plan Documents (DPDs) which outlines its key development goals. When adopted, development control decisions must be made in accordance with the DPDs unless material considerations indicate otherwise.

LBH's UDP was adopted in July 2006 and sets out land use policies for the area up to 2016. The UDP is to be replaced by a LDF. The Planning and Compulsory Purchase Act 2004 allows policies in the existing plan to be 'saved' for 3 years as part of the LDF until they can be replaced by new DPDs. The LDF will include the following documents:

- *Statement of Community Involvement* – this establishes how the Council will involve the community in the preparation of the development plan documents.
- *Core Strategy* – see below.
- *Proposals Map* – this will show the main proposals, designations and areas to which site specific policies apply.
- *Sites Allocations Development Plan Document* – The Sites Allocations DPD will identify appropriate sites to deliver the objectives of the Core Strategy.
- *Development Management Development plan Document* – The Development Management DPD sets out the detailed planning policies that the Council will use when determining applications for planning permission.
- *North London Waste Plan* – The North London Waste Plan which will identify the location of strategic waste facilities across six North London Boroughs (Barnet, Camden, Enfield, Hackney, Islington and Waltham Forest).
- *Area Action Plans* – Wood Green Area Action Plan, Northumberland Park (which includes the redevelopment of Tottenham Hotspur Football Stadium) Tottenham High Road Corridor and Seven Sisters Corridor.
- *Supplementary Planning Documents* – these will provide guidance for specific areas or topics.

The Core Strategy DPD sets out the spatial vision, spatial objectives and core policies for the development of the borough up to 2026 and provides the framework for all the other LDDs. It will include a limited number of higher-level spatial policies, which apply across the whole borough. The Core Strategy will be influenced by a number of documents including the London Plan (which is the Regional Spatial Strategy (RSS) for Greater London, 2008), and the vision for the borough that is contained within Haringey's Community Strategy: A sustainable way forward.

Core Strategy Objectives were identified in the Issues and Options Report (2007). Following the process of identifying draft options and consultations, a number of revisions were made to the draft objectives to make them more specific and focussed.

The Preferred Policy Options for the Core Strategy DPD were identified in the Preferred Options Core Strategy Report (2009) and consulted on in May to June 2009. The consultation responses have been reviewed and have resulted in the further development of policies. Following this, a Pre-submission Core Strategy report has been prepared. The Pre-submission Core Strategy Report is being issued for consultation. This SA Report has

assessed the strategic policies and significant changes and is being issued with the Pre-submission Core Strategy for consultation.

The SA process is an iterative process, which has sought to appraise the Core Strategy during the various stages of plan development. The SA has provided initial appraisals of options from the Issues and Options Report and during the development of the spatial options. The reports listed below present the detailed appraisals and the key, formal outputs of the process:

A SA Scoping Report (Ref: 5000-LN00993-LNR-01) was prepared by Hyder Consulting in 2007 for the Core Strategy and released for statutory consultation in November 2007. Part One of the Scoping Report relates to the Core Strategy, providing generic scoping information that applies to all DPDs. Part Two consisted of separate chapters providing additional scoping information relevant to individual DPDs, for example the Housing Supplementary Planning Document (SPD).

A SA Report which appraised the Core Strategy Preferred Options (Ref: 5004-LN00993-LNR-04) was completed in May 2009 and was released for public consultation with the Core Strategy Preferred Options Report from May to June 2009.

Following the changes to the Core Strategy as a result of the consultations, a Pre-Submission Core Strategy has been produced by the Council. This SA Report (Ref: 5005-LN00993-LNR-01) presents the appraisal of the Pre-Submission Core Strategy.

1.2 Sustainability Appraisal and Strategic Environmental Assessment

SA is a process for assessing the social, economic and environmental impacts of a plan and aims to ensure that sustainable development is at the heart of the plan-making process.

It is a legal requirement that the Core Strategy DPD is subject to SA, under the Planning and Compulsory Purchase Act 2004. This Act stipulates that the SA must comply with the requirements of the SEA Directive¹ which was transposed directly into UK law through The Environmental Assessment of Plans and Programmes Regulations, 2004² (the SEA Regulations).

The aim of the SEA is to *'provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development'* (Article 1 of the SEA Directive).

The principle of ensuring a better quality of life for everyone, now and in the future, lies at the heart of sustainable development. SA is an essential tool for ensuring that the principles of sustainable development are inherent throughout the preparation of the Core Strategy DPD and that it broadly complies and contributes to relevant planning guidance. The overarching aim of the process is to ensure better decision making and planning, and it should be initiated at the earliest possible stage of the Core Strategy's preparation.

¹ Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment, June 2001

² The Environmental Assessment of Plans and Programmes Regulations, 2004 (S.I. 2004 No. 1633)

1.3 Purpose of the SA Report

LBH has prepared a 'Pre-Submission Core Strategy' Report, which takes into account the comments made during the public consultation on the Preferred Options Report during May to June 2009.

It is intended that this SA Report will be used as a consultation document, issued alongside LBH's Pre-Submission Core Strategy Report, in order to obtain feedback on the Pre-Submission Core Strategy DPD. This document:

- Describes the SA/SEA process.
- Provides a detailed methodology of the appraisal process and how this was used to compare and appraise the social, economic and environmental effects of each of the proposed options and policies.
- Presents the findings from the appraisal of the strategic policies and recommendations for mitigation and enhancement.

The results of this consultation will subsequently be used to inform the further development of the Core Strategy DPD and the preparation of the Submission Core Strategy. A Final SA Report will be prepared, assessing any significant changes as a result of the current consultations and would accompany the Submission Core Strategy DPD.

1.4 Structure of this Report

This SA Report documents the SA process, which has so far comprised the Scoping and Assessment Stages, which includes the results of the appraisal of spatial options and the Preferred Policy Options. It presents the findings from the appraisal of strategic options, which were developed following consultation on the Preferred Options Report. Table 1-1 outlines the structure of this Report.

Table 1-1: Contents and Structure of this Report

Section of Report	Outline Content
Abbreviations	Abbreviations used in this report.
Non-Technical Summary	Summary of the overall approach, the options and policies appraised and the SA recommendations.
1. Introduction	Provides background to the SA and includes the purpose and the structure of this SA Report. Provides details of how to comment upon this SA Report.
2. Appraisal Methodology	Outlines the key elements of the SA process and the adopted approach to the assessment. Provides a summary of the SA process undertaken to date and identifies the main limitations of the SA process.
3. Sustainability Objectives, Baseline and Context	Outlines the background and purpose of the Core Strategy and its links to other plans, policies and programmes. It also presents the key baseline issues and opportunities for the borough that the Core Strategy needs to consider. It identifies the main limitations of the SA process.
4. Plan Options Appraisal	Details the issues and options and presents the findings of the appraisal of options.
5. Preferred Options	Details the appraisal of policies and presents mitigation measures.

Section of Report	Outline Content
Policies Appraisal	
6. Monitoring Framework	Provides recommendations for inclusion into LBH's current monitoring programmes.

1.5 How to Comment on this Report

This SA Report has been issued for consultation alongside LBH's Pre-Submission Core Strategy Report (10 May – 21 June 2010). Please address any consultation responses to the Policy Planning Team at the address below:

Planning, Policy and Development
London Borough of Haringey
639 High Road, Tottenham,
London N17 8BD

Copies of the documents are also available for public inspection free of charge during normal opening times at the public libraries and the Council offices at the following locations:

- 639 High Road, Tottenham, N17 8BD.
- Civic Centre, Wood Green, N22 8LE.

Your comments are invited on this SA Report and must be received by 5pm on the 21st June 2010. Please send them to the above address or by e-mail to LDF@Haringey.gov.uk.

2 APPRAISAL METHODOLOGY

2.1 Introduction

Sustainability Appraisals (SAs) are a requirement of the Planning and Compulsory Purchase Act (2004) and Strategic Environmental Assessments are required by the European Directive EC/2001/42, which was transposed into UK law by the Environmental Assessment Regulations for Plans and Programmes (Statutory Instrument 2004 No 1633: The Environmental Assessment of Plans and Programmes Regulations 2004).

The output for an SEA is an Environmental Report, which includes baseline information and prediction of the environmental impacts of the plan. The Environmental Report also identifies alternatives and options, the public participation process and proposals for monitoring.

The output of an SA is a SA Report, which includes the above information but is broadened to take into account social and economic considerations. The purpose of the SA is to promote sustainable development through better integration of sustainability considerations into the preparation of the Core Strategy. As part of this process, a combined SA and SEA is being undertaken. The term, SA shall be used to refer to the combined SA/SEA for the remainder of this report.

The appraisal process has run simultaneously with the development of the Core Strategy DPD. From its commencement, the findings of the appraisal have fed into the plan-making process to improve the DPD as it develops. This SA process is iterative and has sought to appraise the Core Strategy 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 DPD and the SA has complied with the Sustainable Community Strategy.

2.2 Compliance with the SEA Directive and Regulations

This report comprises the SA Report for the Pre-Submission Core Strategy document for Haringey. It has been prepared alongside the production of the draft plan and is published at the same time to provide the consultees information on the plan's sustainability to inform their responses to the Pre-Submission document.

The SA has been undertaken in conformity with SA/SEA guidance as listed in Section 2.3 below and meets the requirements of the Planning and Compulsory Act 2004 and the SEA Regulations. Table 2-1 presents the relevant sections of the SA Report that represent the required contents of the environmental report under the SEA Regulations.

Table 2-1: Environmental Report requirements

Information to be included in an Environmental Report under the SEA Regulations	Relevant sections in the Report
1. An outline of the contents, main objectives of the plan, and of its relationship with other relevant plans and programmes	Sections 1 and 3 and Appendix A
2. The relevant aspects of the current state of the environment and the likely evolution thereof without the implementation of the plan	Section 3 and Appendix B
3. The environmental characteristics of areas likely to be significantly affected	Section 3 and Appendix

Information to be included in an Environmental Report under the SEA Regulations	Relevant sections in the Report
	B
4. Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance, such as areas designated in pursuant to Directives 79/409/EEC (Conservation of Wild Birds Directive) and 92/43/EEC (The Habitats Directive on the conservation of natural habitats and of wild fauna and flora)	Section 3 and Appendix B
5. The environmental protection objectives, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation	Section 3 and Appendix B
6. The likely significant effects on the environment (and economic and social impacts)	Sections 4 and 5 and Appendix C
7. The measures envisaged to prevent, reduce and as fully as possible offset any significant effects on the environment	Sections 4 and 5 and Appendix C
8. An outline of the reasons for selecting the alternatives dealt with	Sections 4
9. A description of how the assessment was undertaken, including any difficulties encountered in compiling the required information	Section 2
10. A descriptions of the measures envisaged concerning monitoring	Section 5
11. A non-technical summary of the information provided under paragraphs 1 – 10	Beginning of the document

2.3 SA/SEA Guidance

The following guidance documents have been consulted throughout the preparation of this SA Report:

- Office of the Deputy Prime Minister (ODPM) et al (2005): A Practical Guide to the Strategic Environmental Assessment Directive; and
- ODPM (2005): Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents which has been superseded by: CLG (2009): SA Guidance for Development Plan Documents (DPD) available at www.pas.gov.uk.

2.4 Appraisal Methodology

The stages of the SA are:

CORE STRATEGY DPD STAGE – PRE-PRODUCTION, EVIDENCE GATHERING
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 Output: Consultation on the Scoping Report

Stage A has been completed for the Core Strategy and a Scoping Report was produced in June 2007. As a result of the comments from the statutory consultees and representatives

from Haringey residents associations, the Sustainability Appraisal Framework was revised prior to undertaking Stage B of the Appraisal.

DPD STAGE - PRODUCTION
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 Output: SA Report on the Core Strategy Preferred Options
STAGE D: Consulting on the approach of the plan and SA Report
Task D1: Public participation on the approach of the plan and SA Report Output: SA Report on the Pre-Submission Core Strategy

The Preferred Options SA Report documented the appraisal of the preferred spatial options, policies and evaluated the significant effects of the plan. Mitigation measures and a monitoring framework were proposed. The Core Strategy Preferred Options Report and the SA were consulted on from May to June 2009 and the findings have been considered in the preparation of the Pre- Submission Core Strategy Report and this SA Report.

This SA Report follows the guidance up to Task D1. Once the representations have been made on this report and the Pre-Submission Core Strategy DPD, the following stages will apply:

STAGE D: Consulting on the approach of the plan and SA Report
Task D2 (i) and (ii): Appraise significant changes resulting from representations Output: SA on the Submission Core Strategy Report
DPD STAGE - EXAMINATION
ADOPTION
Task D3: Making Decisions and providing implementation Output: Final SA Report and Sustainability Statement
STAGE E: MONITORING THE SIGNIFICANT EFFECTS OF IMPLEMENTING THE DPD
Task E1: Finalising aims and methods for monitoring Task E2: Respond to the adverse effects

2.5 Links with Other Assessments

The guidance on SA³ states that where possible, the SA should encompass other types of appraisals and integrate them within the sustainability appraisal process. Other assessments integrated into the SA process include:

- Equality Impact Assessment.
- Habitats Regulations Screening.

An initial Equalities Impact Assessment (EQIA)⁴ (July 2007) was carried out during the SA scoping stage. This was updated in May 2009 when the preferred policy options have been developed and strategic policies were assessed against the equality groups. Most of the policies had positive effects except Conservation Policy, which had a potential to discriminate against equality groups (age, disability and gender) as the priority is to conserve and enhance older buildings. This EQIA Report⁵ identified gaps (qualitative and quantitative data for all the equality strands) which will be required before a full EQIA can be carried out. It suggested that the gaps identified can be further addressed by additional engagement with different stakeholders.

An initial Habitats Regulations Screening (HRA)⁶ (June 2007) was undertaken during the SA Scoping. This assessed the overall effects of the Core Strategy on any Natura 2000 Sites. This report was submitted to Natural England, who approved the report. The HRA was updated during the preparation of the SA on the Pre-Submission Core Strategy as information on the preferred options and policies was available and so the effects of the options and policies on the Natura 2000 sites were assessed (January 2010)⁷.

2.6 Stages in the Appraisal Process

The Haringey Core Strategy DPD has been subject to a SA process that meets the requirements of the SEA Directive and has included the following key activities as set out in Table 2-1.

Table 2-1: Stages of the Core Strategy Preparation and the SA Process

Haringey Core Strategy DPD	When	SA Process
Preparation of Issues and Options Report	April –November 2007	SA Scoping and production of a Scoping Report (June 2007). Develop SA/SEA framework and methodology, including objectives, indicators, targets and trends.

³ ODPM (2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents. Now updated by the Plan Making Manual (2009) available at: www.pas.gov.uk.

⁴ Hyder Consulting (2007) Initial Equalities Assessment

⁵ London Borough of Haringey (2009) Initial Equalities Assessment - Initial Report on the Preferred Options.

⁶ Hyder Consulting (2007) Appropriate Assessment Screening Report

⁷ Hyder Consulting (2010) Habitats Regulations Screening Report Update

Haringey Core Strategy DPD	When	SA Process
	June - July 2007	Consult on SA Scoping Report. SA Scoping report was issued to the statutory consultees and the Haringey Residents Association and Friends of the Earth for comments.
Consultation on Issues and Options Report	February – March 2008	Review of consultation responses and refinement of SA objectives and initial appraisal of Issues and Options (March 2008).
Review of consultation responses	April – June 2008	
Development of Spatial Options	June – October 2008	Initial appraisal of spatial options (June October 2008). Options Development Advice Note (June 2008). The recommendations made by the SA/SEA process were generally taken forward in the development of the preferred plan approach. The findings of the detailed appraisal of spatial options are documented in the draft SA Report on the Preferred Options (May 2009).
Development of the preferred option and policies	Oct 2008 – Jan 2009	Appraisal of preferred options and policy options. The findings are documented in the draft SA Report on the Preferred Options (May 2009). Recommendations made by the SA/SEA process on the policies resulted in amendments to some policies to improve sustainability.
Consultation on the Core Strategy Preferred Options Report	5 May – 30 June 2009	Consult on the SA of the Preferred Options Report.
Review of consultation responses	July 2009	Review of consultation responses and finalise SA Report on Preferred Options (July 2009).
Preparation of the Pre-submission Report	August 2009 – March 2010	Prepare an SA Report, documenting SA process. Appraise strategic policies developed resulting from consultation and amendments/refinement of the Preferred Options. New strategic policies have been developed (e.g. relating to climate change, energy use, water management and flood issues, delivery and monitoring) and some policies expanded/further refined. These were appraised against the SA Objectives.
NEXT STEPS		
Representations/public participation on the Pre-Submission	May – June 2010	Consult on the SA Report.

Haringey Core Strategy DPD	When	SA Process
Report		
Preparation of the Submission Report		Appraise significant changes to the Core Strategy as a result of representations.
Examination of Core Strategy DPD		Test of Final SA Report.
Adoption of Core Strategy		Publication of SA Report.

2.7 Limitations

There are levels of uncertainty in appraisal of policies, such as:

- Data limitations – variability in data and collection measures and lack of indicators for social and health issues.
- Lack of precision – environmental, social and economic issues can be difficult to quantify or measure with a high degree of accuracy.

3 SUSTAINABILITY OBJECTIVES, BASELINE AND CONTEXT

3.1 Introduction

This section presents information that was included in the Scoping Report and has been updated in response to the comments received during the scoping consultation. Additional information is included in Appendices A and B. The SEA requirements are outlined in Box 3-1

Box 3-1: SEA Directive Requirements Applicable to Scoping Stage

The Environment Report should provide information on:

- 'the relationship (of the plan or programme) with other relevant plans and programmes' (Annex 1(a))*
- 'the environmental protection objectives, established at international (European) 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' (Annex 1(a), (e))*
- 'relevant aspects of the current state of the environment and the likely evolution thereof without its implementation of the plan or programme' and, 'the environmental characteristics of the areas likely to be significantly affected' (Annex 1(b), (c))*
- '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' (Annex 1 (c))*
- 'Authorities which, by reason of their specific environmental responsibilities, are likely to be concerned by the environmental effects of implementing plans and programme...shall be consulted when deciding on the scope and level of detail of the information which must be included in the environmental report.' (Article 5.4).*

3.2 Review of Plans, Programmes and Sustainability Objectives

A review of the relevant plans, programmes and environmental protection objectives was undertaken for the SA Scoping Report in order to:

- Identify any external social, environmental or economic objectives, indicators or targets that should be reflected in the SA process.
- Identify any baseline data that should be reflected in the SA.
- Identify any external factors that might influence the preparation of the plan, for example sustainability issues.

The review included documents prepared at international, national, regional, sub-regional and local scale. Each document is reviewed to determine how it may affect the SA and Core Strategy DPD development. This information has been used to inform the subsequent stages of the process. A summary of the findings of the review of relevant plans and programmes is provided in **Appendix A**.

3.3 Baseline Information

The SEA Directive requires information to be gathered on “*the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme*” (Annex 1(b)) and the “*environmental characteristics of the areas likely to be most significantly affected*” (Annex 1(c)).

Government guidance suggests that baseline information provides the basis for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. The collection and assessment of broad information and data about the state of Haringey is used within the SA process to help predict the Core Strategy’s effects.

Baseline topics that were reviewed as part of the SA include the following:

- Social: population, housing, human health, education, deprivation.
- Environment: water and flooding, soil and land quality, air quality, climatic factors, biodiversity, cultural heritage, townscape, landscape, waste and transportation.
- Economy: employment, business development.

Baseline data indicators, key trends and targets are presented in **Appendix B**.

3.4 Identify Sustainability Issues

The key issues and opportunities identified through the SA process so far are summarised below.

Social

- 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 the 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. Deprivation is a very complex issue and requires a coordinated approach by all service providers to tackle the underlying issues, such as health, education and crime deprivation.
- Educational attainment is lowest in White Hart Lane, Northumberland Park and Seven Sisters.
- There are opportunities to improve educational attainment in the borough which in turn provide wider social benefits and benefits to the local economy.
- Targeted health improvements would enhance overall quality of life in the borough. Primary healthcare facilities, particularly in some areas of Tottenham, require modernisation.
- Worklessness, isolation and low income have adverse effects upon resident’s health and wellbeing.
- The higher proportion of older people in the borough is likely to place increasing pressure on health services in Haringey.
- Regeneration programmes present significant opportunities both to revitalise the housing stock in the borough and to improve quality of life.

- Given the overwhelming need for affordable housing in the borough, the local authority must focus on those in greatest need and reduce the numbers of homeless households and those in temporary housing.
- To improve community safety, sustainability and community cohesion, there should be a focus on the quality of existing and new homes.
- Future housing growth will place pressure on other land uses, open spaces and local services and if not carefully integrated will affect the character of the borough.
- Appropriate service provision is required for all groups of the community in terms of education, housing and health.
- Promotion of community activities could take advantage of Haringey's ethnic diversity and encourage cohesion across neighbourhoods, cultures and generations.
- The west of the borough is predominantly 'older' than the east. This will have implications for provision of educational, health and recreational facilities.
- Opportunities to reduce the need to travel should be explored, for example encouraging home-working and locating high trip generating development in areas of good public transport accessibility.
- Stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas.
- The DPD should seek to:
 - Improve access to services, particularly educational and training facilities;
 - Promote community cohesion;
 - Improve community safety.

Economic

- The regeneration of Haringey Heartlands, Tottenham Hale and those industrial areas within Central Leaside offers new business and employment opportunities.
- Inward investment should be encouraged, with a focus on growth sectors and existing key business clusters.
- Start-up businesses should be encouraged and supported.
- There are opportunities to raise educational attainment and develop skills to reduce levels of worklessness and associated deprivation.
- Existing employment areas including town centres should be retained and enhanced.
- There are opportunities to raise educational attainment and develop skills to reduce levels of worklessness and associated deprivation.
- Transport links should be improved to major employment opportunity areas outside of the borough including Stratford, Brent Cross and Stansted Airport.
- In order to meet projected growth in expenditure, there is a need for additional shopping and service facilities.
- The DPD should seek to:
 - Reduce the vacancy rate across the borough.
 - Maintain and enhance the environment within each centre.
 - Implement measures that maintain high levels of accessibility and public transport to the centre.

Environmental

- Parts of the Lee Valley Regional Park fall within the boundary of the LB Haringey. These include Tottenham Marshes (Site of Importance for Nature Conservation Borough Grade I), Markfield Park (Site of Importance for Nature Conservation Borough Grade II) and the Paddock (which is part of the Lee Valley site of Metropolitan Importance (SMI) for Nature Conservation). The Lee Valley Ramsar/SPA site falls just outside the borough boundary. There are 60 Sites of Importance for Nature Conservation (SINCs) in Haringey (of which 5 are of Metropolitan Importance, 9 of Borough Importance Grade 1, 13 Borough Grade II and 33 of Local Importance). All biodiversity sites and species should be protected and, where possible enhanced.
- Biodiversity sites should function as multifunctional greenspace which are designed to a high standard of quality to accommodate nature, wildlife and historic and cultural assets.
- 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 biodiversity value of waste land and derelict sites should be recognised.
- Opportunities should be sought to enhance green corridors/chains within the borough.
- The East London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- Haringey has a total of 467 Listed Buildings of which 6 are Grade 1 and of outstanding national significance. There are 29 Conservation Areas and 22 Areas of Archaeological Importance. All cultural heritage features should be conserved.
- Finsbury Park and Alexandra Park are identified as historically important parks. Whilst preserving statutory sites, it is important to ensure that the wider historic landscape is protected and enhanced and that cultural heritage issues are addressed by new development.
- Haringey has a network of Metropolitan Open Land (Alexandra Park) and Significant Local Open Land. Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked.
- Green Belt- the Lee Valley Regional Park is Haringey's single area of designated Green Belt.
- Where necessary, the accessibility and quality of open spaces should be improved.
- Opportunities for accessible open spaces should be explored within new development.
- There are opportunities to improve smaller open spaces and green areas around highways and junctions, including tree planting.
- Opportunities should be sought to ensure waterways contribute towards the provision of green corridors within the borough by creating buffer zones.
- Continue efforts to encourage access for all to the River Lee to provide health and educational excursions for residents and visitors.
- Encourage development which includes Sustainable Drainage Systems (SuDS) and incorporates facilities to reduce water consumption and re-use grey water.
- A variety of industrial land uses have potentially left behind substantial contamination in the borough.
- Although there is a Government emphasis upon redeveloping brownfield sites, the biodiverse nature of some brownfield sites must be acknowledged.

- The regeneration of Haringey is continuing at pace. LBH must continue to prioritise brownfield sites, which offer the greatest capacity for development and those, which may be better used as a green resource.
- The Core Strategy should include a clear policy statement on flood risk in urban areas, including:
 - Development is located in the lowest risk area;
 - New development is flood-proofed to a satisfactory degree and does not increase flood risk elsewhere;
 - Surface water is managed effectively on site;
 - The borough applies the sequential approach when determining planning applications;
 - Flood storage and SuDS used where practicable. Most appropriate for Haringey include pervious pavements and green roofs.
- Efforts are required to reduce car use through design i.e. capped car provision for new developments.
- Encourage businesses/services to produce travel plans and require them as part of planning applications for new development with significant transport implications.
- Set out best practice aspects of design, orientation, density and location of buildings to minimise energy demand, optimise sustainability and minimise the impact of air pollution and noise inside buildings.
- Energy efficiency measures, including community heating schemes, Combined Heat and Power and energy action zones should be encouraged.
- There is an opportunity to link existing homes to a decentralised local energy network.
- A proportion of the energy requirement from new development should be provided from on site renewable sources.
- Broad areas for the development of specific renewable energy technologies should be identified.
- A strategic waste processing facility, at Edmonton, is located close to Haringey. Transport implications must be managed carefully.
- Haringey is performing well in terms of reuse, recycling and composting, however, opportunities should be sought to further reduce waste production.
- Sustainable sourcing and waste management principles should be promoted for all new developments that occur in the borough.
- Opportunities should be sought to reduce dependency on the private car and increase public transport use.
- Key transport interchanges require upgrading/improvements to accommodate proposed housing developments and regeneration programmes.
- Encourage a high quality urban environment that supports active travel.

3.5 The Sustainability Appraisal Framework

The methodology used to develop the SA Framework was in accordance with the ODPM guidance. The SA Objectives have been devised using the SEA Directive topics and informed by the issues and opportunities identified through the baseline data collection. This was supplemented with direction from the key international, national, regional and local planning documents reviewed at the Scoping Stage.

During the Scoping Stage, a suite of 19 SA Objectives were developed and were presented in the SA Scoping Report. The SA Scoping Report was subject to consultation in November 2007.

3.6 Consulting the Scope of the Sustainability Appraisal

Following recommendations from statutory consultees, the original SA Framework was reviewed and updated. The final 20 SA Objectives within the SA Framework that have been used to assess the Core Strategy DPD are presented in Table 3-1.

Table 3-1: Final SA Framework of 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.

SA Objective		Sub-Objectives
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.
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.

SA Objective		Sub-Objectives
		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.
		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.

4 PLAN OPTIONS APPRAISAL

The SEA Directive requires that the Core Strategy should be assessed. Box 4-1 identifies the activities required to comply with the Directive.

Box 4-1: SEA Directive Requirements Applicable to Assessment Stage

In the Environmental Report, *"the likely significant effects on the environment of implementing the plan or programme ... and reasonable alternatives ... are [to be] identified, described and evaluated"* (Article 5.1). *The Environmental Report should include information that may "reasonably be required taking into account current knowledge and methods of assessment, the contents and level of detail in the plan or programme [and] its stage in the decision-making process"* (Article 5.2).

Information to be provided in the Environmental Report includes:

- *"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. These effects should include secondary, cumulative, synergistic, short, medium and long-term, permanent and temporary, positive and negative effects"* (Annex I (f) and footnote)
- *"an outline of the reasons for selecting the alternatives dealt with"* (Annex I (h))
- *"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..."* (Annex I (g))

4.1 Testing the DPD Objectives

Good practice guidance recommends that the key aims and principles of the DPD should be assessed against the SA Objectives, in order to test their compatibility and to determine whether they accord with broad sustainability principles. A vision and spatial objectives for the development of the borough for the next 15 years were set out in the Core Strategy Issues and Options Report produced by the Council in December 2007. Haringey's Core Strategy gave spatial interpretation to the adopted Sustainable Community Strategy's key outcomes:

- People at the heart of change;
- An environmental sustainable future;
- Economic vitality and prosperity shared by all;
- Safer for all;
- Healthier people with a better quality of life; and
- People and customer focus.

Under these outcomes, spatial objectives have been developed.

The Core Strategy objectives were appraised against the SA Objectives using a matrix based approach and recommendations to improve the wording of the Core Strategy objectives were made to improve their sustainability performance. The results of the compatibility assessment are summarised in Table 4-1 below and the appraisal tables are included in Appendix C.

Table 4-1: Compatibility of Core Strategy Objectives with SA Objectives – Results Summary

Core Strategy Objective	Results Summary	Recommendation	Suggested Alterations to Core Strategy Objective
1. People at the Heart of Change	<p>Growth in housing, employment areas and their supporting infrastructure is compatible with a number of SA Objectives by providing a mechanism, for example, to <i>provide greater choice, quality and diversity of housing across all tenures</i> (SA Objective 4), <i>improve access to services and amenities</i> (SA Objective 6) and <i>encourage economic inclusion</i> (SA Objective 9).</p> <p>In addition, providing development is managed sustainably and by 'minimising environmental impacts', there are only potential incompatibilities with relating to water, energy and resource use.</p>	<p>Since the strategic objectives are based on the Community Strategy which refers to building, 'sustainable communities', these should be referred to and defined so that it is in agreement with the SA Objectives relating to water, energy and resource consumption; and sustainable transport.</p>	<p>To promote the efficient and effective use of land whilst minimising environmental impacts and promoting sustainable communities.</p>
2. An Environmentally Sustainable Future	<p>This objective performed well against the SA Objectives particularly the environment objectives (SA Objectives 11 – 20). There were no potential incompatibilities. However the objective was considered to be generally unrelated to SA Objectives 1 – 10.</p>	<p>None.</p>	<p>N/A</p>
3. Economic Vitality and Prosperity Shared by All	<p>Development of different economic sectors and employment areas could be incompatible with environmental SA Objectives, such as those relating to biodiversity, landscape, townscape, heritage and air quality. This development would also be likely to increase water, energy and resource consumption (SA Objectives 14 and 18).</p> <p>Despite the potential incompatibilities, this objective performed well against SA Objectives relating to education, access to services, business development and employment.</p>	<p>The objective could include reference to development within the environmental constraints of the site and incorporating design solutions to adapt to climate change and resource consumption.</p> <p>Sustainable transport options to link deprived areas to major sites to be developed and improve access opportunities should be incorporated to give this objective greater strength.</p>	<p>To meet the needs of different sectors of the economy, including SMEs and those organisations within the voluntary sector through the provision of a range of premises of different types, sizes and costs within environmental limits. and: To support the sustainable development of Haringey's most successful growth sectors.</p>

Core Strategy Objective	Results Summary	Recommendation	Suggested Alterations to Core Strategy Objective
4. Safer for all	This objective contributed positively to SA Objectives relating to crime and disorder, health and well-being, townscape and heritage, open spaces, and the vitality and vibrancy of town centres.	New buildings and spaces should be accessible for all groups.	To promote safe, accessible and secure buildings and spaces.
5. Healthier People with a Better Quality of Life	This objective performed well against the social SA Objectives including education, health, access to services and facilities and community cohesion. There were no potential incompatibilities.	There could be direct benefits to SA Objective health and indirect positive effects to environmental SA Objectives including air quality and sustainable transport by including reference to promoting walking and cycling and thereby reducing the volume of road vehicles.	None.

4.2 Developing the DPD Options

The Issues and Options Report identified five strategic priorities and under each priority were main four issues to be addressed in the Core Strategy. An initial set of options were identified by Haringey Council's planning officers to achieve the Core Strategy objectives and address the issues identified. The SA carried out an initial appraisal (June 2008) and provided recommendations for the further development of the options. The main findings include the following:

- In general, the options recognise the need for improving housing and employment areas.
- The main areas where options scored a potential negative effect against the SA Objectives included the following: accessibility to services and facilities, protection of open spaces, adaptation to climate change and sustainable use of resources.
- The main areas where options scored positively include: providing choice and diversity of housing, use of brownfield sites and encouraging economic inclusion.

Recommendations included:

- Growth was recommended to be concentrated within areas of housing and employment requirements rather than spread across the borough to ensure that other sustainability objectives are not adversely affected. This is to ensure that development is located where it would not have a negative effect on the character of area.
- Large developments require careful spatial planning to ensure that sustainability objectives are not compromised. For example, the impact and suitability of larger family homes depends on their location, access to facilities and services and their effect on environmental aspects.
- Green design should be incorporated in all developments and conversions.

4.3 Appraisal of Spatial Options

Following the appraisal of the initial options, the options were further developed, taking into account the responses to consultation on the Issues and Options report and further evidence collected. Four spatial options were developed comprising:

- 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.

The SA carried out the appraisal of the options against the SA Objectives. Another option, Option E, a Market Driven Approach was included in the appraisal. This option served as a benchmark as to what would happen without the Core Strategy to guide development.

Each option was assessed against the SA Objectives and recommendations were made on how each option may improve in sustainability. Each option was appraised by examining the effects on the current baseline or its contribution towards meeting targets or statutory requirements. The appraisal attempted to predict broad impacts and trends to identify the most sustainable options.

The appraisal concluded that Options A-D may have indirect effects on safety and vitality of town centres. Option C was not considered sustainable with regard economic SA Objectives and Option D did not address housing needs. Options A and B were found to be the most sustainable options and more likely to result in a balanced development. Option E was the least sustainable since development would have been ad hoc and therefore opportunities for mitigation and enhancement were limited. A summary of results of the appraisal are presented in Table 4-2 below and the detailed Appraisal Tables are included in Appendix D.

Table 4-2: Appraisal of Spatial Options – Summary

Core Strategy Options	Appraisal against SA Objectives	Recommendations
<p>Option A A borough-wide approach focussing on identified areas of change</p>	<p>Option A performs 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).</p> <p>A weakness of this Option is that it is 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 enough capacity in existing services to accommodate new residents.</p>	<p>Specific recommendations to address potential negative impacts of this option include:</p> <ul style="list-style-type: none"> ▪ Regeneration initiatives should include the improvement of public realms. ▪ Consider leaving vacant land as open space, linking open space areas to larger open spaces to create a green infrastructure network. ▪ Consider the impact of high density development on the townscape.
<p>Option B East/Central/West Spatial Approach</p>	<p>Option B performs 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.</p> <p>This Option can focus on the level of community facilities needed, the type and number of housing developments, suitable employment opportunities in</p>	<p>Recommendations to address potential negative impacts of this option include:</p> <ul style="list-style-type: none"> ▪ Consider issues that require borough-wide policies. ▪ Consider borough-wide opportunities and links between the areas. ▪ Improve/ create green infrastructure links between areas.

Core Strategy Options	Appraisal against SA Objectives	Recommendations
	<p>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.</p> <p>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.</p>	
<p>Option C Housing Led Growth</p>	<p>This Option would address housing needs in the borough and provide a variety of housing types. Increased densities of housing in town centres would increase the vitality and vibrancy of those areas. However, releasing surplus land to housing could have an adverse effect on the local economy and potential for growth. It would have an adverse effect particularly in areas with high unemployment (Tottenham Hale).</p> <p>A number of SA Objectives could be adversely affected by this option, such as those relating to community facilities, land, open spaces, landscape, transport, air quality, water resources and resource use. There will be increased pressure to develop not only employment land but also open spaces. Increase in population would increase traffic.</p> <p>Large scale and high density housing development could have potential to have a negative impact on townscape if the local area's character is not taken into account.</p> <p>In terms of the environment, there will be an increase in water surface run-off, water use and energy use. There will also be an increase in the use of resources.</p>	<p>Recommendations to address potential negative impacts of this option include:</p> <ul style="list-style-type: none"> ▪ Considering Haringey's high unemployment rates, employment land should be retained. ▪ Policy to ensure that high density housing is located in areas accessible to public transport. ▪ Protect open spaces from housing development.

Core Strategy Options	Appraisal against SA Objectives	Recommendations
<p>Option D Economic Regeneration Through Employment</p>	<p>This option would provide benefits by promoting employment land near transport corridors. It would contribute to SA Objectives relating to employment, economic growth and transport. However, developing land mainly for employment uses will have an adverse effect on housing needs.</p> <p>This option provides for community and leisure facilities and environmental improvements as a result of development, which will contribute to SA Objectives on community facilities, open spaces and indirectly health. This option is likely to provide employment and training opportunities, which could contribute to economic inclusion,</p> <p>However, this Option has potential to have adverse effects on SA Objectives relating to: housing, water, energy and resource use.</p>	<p>Recommendations to address potential negative impacts of this option include:</p> <ul style="list-style-type: none"> ▪ Retain sufficient land for housing to provide a balance with economic development. ▪ Protect open spaces from development.
<p>Option E</p>	<p>There is a lot of uncertainty about this option. Housing development could occur in unsuitable locations and affordable housing needs may not be met.</p> <p>Without a Core Strategy, there is a risk of adverse impacts on valuable resources, such as energy, water, open space and heritage. Ad-hoc development could put increased pressure on transport and community facilities such as education and health. It is also unlikely that social and deprivation issues of the borough would be addressed and mitigated.</p> <p>In the long-term, the lack of a spatial planning strategy is likely to exacerbate existing problems and potentially create new issues for the borough.</p>	<p>The potential negative impacts of this option would be major and it is recommended that this option should not be pursued.</p>

Specific recommendations, applicable to each of the Spatial Options were provided in Table 4-2. General recommendations that should be taken into account for any Spatial Option taken forward included the following:

- New developments should be encouraged to consider safety by design measures;
- All developments should consider the potential for biodiversity in brownfield sites and implement mitigation measures where necessary;
- Use SuDS in new developments, if possible;
- Energy efficiency and the use of renewables should be promoted in all developments;
- Housing developments should be encouraged to achieve at least level 4 of the Code for Sustainable Homes;
- All new office developments and refurbishments should be encouraged to achieve 'excellent' BREEAM ratings; and
- Use of technologies to reduce water use.

The SA process and results from the Issues & Options consultation, which highlighted residents' support for concentrated growth at key sites as well as looking at a borough-wide

approach, had influenced LBH's decision in selecting the preferred option to take forward, which was a combination of Options A and B.

4.4 Appraisal of Policy Options

Having selected the spatial approach, policy options were grouped into 12 policy themes: Managing Growth, Housing, Environment, Movement, Employment, Town Centres, Design, Conservation, Green Infrastructure, Health and Wellbeing, Culture and Leisure, and Community Infrastructure. In total, there were 27 policy options, consisting of preferred and alternative options for each policy.

An appraisal of the policy options was undertaken against the SA Objectives. The following key issues emerged from the assessment:

SA Objectives Not Addressed

The majority of the options failed to address the issues relating to the following SA Objectives (indicated by fourteen or more neutral or zero scores):

- 1 – To reduce crime.
- 2 – To improve levels of educational attainment for all age groups and sectors of society.
- 8 – To develop the skills and training needed to establish a healthy labour pool.
- 9 – To encourage economic inclusion.
- 14 – To protect and enhance the quality of water features and resources.

SA Objectives Adversely Affected

Most of the options performed poorly against the following SA Objectives (seven or more negative effects):

- 16 – To adapt to climate change.
- 17 – To protect and improve air quality.
- 18 – To limit climate change by reducing CO₂ emissions.
- 19 - To ensure sustainable use of resources.

Positive contributions to SA Objectives

Most of the options resulted in eight or more positive effects against the following SA Objectives:

- 3 – To improve physical and mental health for all and reduce health inequalities.
- 4 - To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents.
- 5 - To protect and enhance community spirit and cohesion.
- 6 - To improve access to services and amenities for all.
- 7 - To encourage sustainable growth and business development across the borough.
- 10 – To improve the vitality and vibrancy of town centres.
- 11 – To protect and enhance biodiversity.

- 12 – To protect and enhance the borough’s townscape and cultural heritage resources.
- 13 – To protect the borough’s landscape resources.
- 15 – To encourage the use of previously developed land.
- 17 - To protect and improve air quality.

Potential positive effects from Preferred Policy Options are mostly direct impacts. The assessment revealed the following potential sustainability benefits associated with the preferred policy options:

- Providing greater choice, quality and diversity of housing;
- Improving health;
- Improving access to and provision of services and facilities;
- Provision of suitable open areas for recreation; and
- Improvement of public realm through open spaces provision and regeneration.

Potential adverse cumulative effects which could result from growth and development contained in policy options include:

- Increase in water consumption;
- Increase in traffic and reduction in air quality; and
- Increased risk of flooding.

Some preferred policies (SP1, SP2, SP6, SP8,) have potential for both positive and negative effects. For example, SP1 (Managing Growth) is likely to result in denser development in the regeneration areas, with potential impacts on health through overcrowding and stress on existing infrastructure and services. However, locating developments in existing centres may improve access to services. SP2 (Housing) maximises housing provision, which is likely to increase travel. However, this policy proposes to locate housing in regeneration areas and town centres, which are likely to be accessible by public transport and could therefore reduce car use. SP6 (Town Centre) supports intensification and expansion in town centres to include housing, could have beneficial effects by improving access to services for residents but depending on the design of the developments, this option could also have potential positive and negative effects on townscape and character.

Cumulative Effects

The policies within the plan have been assessed for their individual impacts but there may be cumulative effects which could occur as a result of the policies being implemented in combination. Potential positive cumulative effects include the following:

- Provision of better quality homes and diversity of housing types.
- Improvement in health.
- Improvement in access to and provision of services and facilities.
- Provision of suitable open areas for recreation.
- Improvement of public realm through open spaces provision and regeneration.

The appraisal matrices included commentaries and recommendations on how the policy options’ sustainability performance could be improved. The results are presented in Appendix C.

A draft SA Report on the Preferred Options was produced in May 2009 and this was issued for consultation to the statutory environmental bodies, other key stakeholders and the wider

public alongside the Core Strategy Preferred Options report during May – June 2009. Following receipt of the consultation comments, the SA Report was finalised in July 2009.

The preferred options were considered in light of the sustainability appraisal, the findings of the Issues and Options consultation and the reasons for selecting the preferred option is provided in Table 4-3 below.

Table 4-3: Policy Options

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
Theme: People at the heart of change in Haringey			
SP1 Managing Growth	<p>Option 1 would focus growth in relation to the differing needs and issues present in the east, central and western areas of the borough</p> <p>Option 2 sets out a housing led approach to growth</p> <p>Option 3 sets out an economic-led approach</p>	<p>Option 1 assumes that each area is equal in terms of existing infrastructure and opportunities and there is concern that this approach will not deliver the spatial strategy.</p> <p>Option 2 would not meet local objectives of maximising business opportunities and supporting local businesses.</p> <p>Option 3 would meet community objectives to support local employment but would not meet housing needs and does not provide a spatial planning approach which balances economic, social and environmental concerns.</p>	<p>Policy SP1 performed particularly well against the social objectives: SA Objectives 4 (housing), 5 (community cohesion) and 6 (access to services). It will have positive impacts on the economic base as a result of regeneration programmes in these areas and it will contribute to the vitality and vibrancy of the town centres. All the options are predicted to deliver significant positive effects in terms of promoting the use of previously developed land.</p> <p>Option 1 may result in uncoordinated growth since the different areas of the borough (eastern, central and western) would be competing with each other. Option 2 is less likely to contribute to economic objectives because it sets out a housing-led approach to growth.</p>
SP2 Housing	<p>Option 1 aims to provide sufficient housing in terms of numbers, the range and type to meet the needs of the borough's population.</p>	<p>Option 1 provides a blanket approach to meet housing needs but does not distinguish between location, type of housing needed and the impacts on the locality where major developments would be provided.</p>	<p>SP2 performs well against social objectives: SA Objectives 3 (health) and 4 (housing). This option is likely to perform well against SA Objective 12 (townscape and cultural heritage) and SA Objective 9 (economic inclusion) by locating housing in sustainable locations, which means that residents will have good access to jobs.</p> <p>Option 1 would address Objectives 4 (housing) and 3 (health), it would not perform as well as the Preferred Policy Option.</p> <p>Both options will have positive impacts on Objectives 6</p>

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
			(access) and 20 (sustainable transport) since new homes are to be located in town centres. However, maximising housing provision may put pressure on the capacity of existing services.
SP3 Environment	Alternative is to encourage development in Haringey, protecting local resources and maintaining as a minimum, statutory protection for residents and the environment.	This option would meet only minimum requirements as required by regional, national and international policies and regulations. Haringey seeks to work beyond these standards to improve the environment for all.	SP3, which seeks to protect and enhance Haringey's strategic and local resources, is likely to contribute strongly to environmental objectives: SA Objectives 11 (biodiversity), 12 (townscape and cultural heritage), 13 (landscape), 16 (climate change), 17 (air quality), 18 (CO2 emissions) and 19 (sustainable use of resources). The alternative option is expected to have positive effects but the effects are not likely to be as significant.
SP4 Movement	Option 1 will meet strategic objectives through provision of public transport and road network capacity to meet anticipated future demand. Option 2 will support private car ownership and usage.	Option 1 is not considered sustainable for financial, economic regeneration and environmental reasons. Provision of additional public and high way capacity is likely to be expensive and previous increases in highway capacity have resulted in increases in road traffic. Option 2 goes against government policy to reduce private car use as this would lead to worsening road conditions and associated air pollution and noise.	SP4 performs well against environmental objectives: SA Objectives 17 (air quality), 18 (CO2 emissions) and 20 (transport). It also addresses the issue of safety, which would have a beneficial effect on the social objective of reducing crime. The alternative options will have more limited beneficial contributions to SA Objectives. Option 1 would have a negative effect on SA Objectives 11 (biodiversity), 12 (townscape) and 13 (landscape). This option is also likely to result in an increase in road traffic, with adverse impacts on SA Objectives: 17 (air quality), 18 (climate change and CO2 emissions) 19 (use of fuel resources) and 20 (sustainable transport).

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
			Option 2 will result in increased traffic and would have a negative impact on SA Objectives: 17 (air quality), 18 (CO2 emissions), 19 (use of fuel resources) and 20 (sustainable transport).
SP5 Employment	Option 1 promotes greater flexibility of land uses within employment areas including Strategic Industrial Locations (SILs).	This option does not support local employment and would have an overall adverse effect on SA Objective 7 (sustainable economic growth). Inappropriate development in SILs can compromise the offer of sites as competitive locations for industry, transport, logistics, utilities or waste management.	SP5 is expected to perform well against SA Objective 7 (economic growth) and may contribute to SA Objectives 8 (skills and training) and 9 (economic inclusion). Option 1 is likely to have adverse effects on SA Objective 7 (sustainable economic growth). The Employment Land Study (2008) concluded that demand in North London and Haringey for logistics, warehousing, waste and recycling facilities and transport related functions will increase. It is therefore likely that there will be need for employment land in the future.
SP6 Town Centre	Option 1 will safeguard all existing town centres and resist further expansion or development of any kind. Option 2 aims to protect existing town centres for retail office and restrict further housing growth.	Option 1 protects all centres from development and is not in accordance with national or London Plan guidance or town centre health checks to assess viability of centres. It is also likely to have an adverse impact on economic objectives by limiting expansion or development. Option 2 does not comply with new guidance PPS6 to diversify the range of services, facilities in key locations such as town centres and contradicts PPS3 Housing and the need to increase supply from all sources in maximising housing	SP6 performs well against economic and social objectives, particularly SA Objectives 4 (housing) 5 (community cohesion), 6 (access to services), 7 (economic growth) and 10 (town centres) and would have indirect beneficial effects on SA Objectives 8 (skills and training) and 9 (economic inclusion) through expansion and intensification. However, expansion of town centres could impact on the fringes of these areas. This option is likely to have a beneficial impact on SA Objective 15 (previously developed land). Option 1 is likely to have adverse effects on the economic objectives (SA

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
		<p>delivery in suitable locations. This option supports economic objectives but restricts housing growth, which may have adverse effects on SA Objective 4 (housing).</p>	<p>Objectives 7, 8, 9 and 10) by limiting expansion or development. This option could also have an adverse impact on SA Objectives 12 (townscape) as there could be decline of some sites, 13 (landscape) as limiting expansion in town centres could result in out of town developments.</p> <p>Option 2 supports social and economic objectives (SA Objectives 5, 6, 7, 8, 9, and 10) but restricts housing growth. This option would have adverse effects on SA Objectives 4 (housing), 11 (biodiversity) and 13 (landscape resources) as pressure to develop housing on greenfield land would increase.</p>
SP7 Design	<p>There is no alternative presented in SP7 as this policy takes into account the design principles set out in the London Plan.</p>	N/A	<p>SP7 is expected to perform well against SA Objective 12 (townscape) and indirectly to SA Objectives 1 (reduce crime), 5 (community cohesion), 10 (town centres), 13 (landscape), 16 (climate change and reduction in flood risk), 18 (CO2 emissions) and 19 (sustainable use of resources).</p>
SP8 Conservation	<p>Option 1 takes a blanket approach to the historic environment and promises to “preserve” and “enhance”.</p> <p>Option 2 takes a more flexible approach to the use and re-use of historic areas and buildings in the identified areas of</p>	<p>Option 1 assumes that all buildings should be protected from development and does not appreciate how good design can enhance an historic building.</p> <p>Option 2 does not support principles of good design or respect the borough’s historic environment.</p>	<p>SP8 performs well against SA Objectives 12 (townscape and cultural heritage) and 13 (landscape) and 19 (sustainable use of resources).</p> <p>Option 1 is likely to have adverse effects on SA Objective 4 (housing) as it would prevent re-use of buildings. There would be no enhancement of buildings and the environment so this option is not expected to contribute to SA Objective 10 (town</p>

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
	change.		centres), 12 (townscape) and 13 (landscape). Also, opportunities to develop PDLs (SA Objective 15) into better use would be lost. Option 2 could contribute to SA Objective 4 by providing housing. However, changes to conservation areas or buildings could result in adverse impacts on townscape (SA Objective 12) and aesthetics if their design does not integrate well with local or historic heritage.
SP9 Green Infrastructure	<p>Option 1 seeks to protect and enhance all existing open spaces within the borough and provide contributions to the borough's green infrastructure in areas of open space deficiency.</p> <p>Option 2 will protect the best quality open spaces and allows poorer quality open spaces (not in areas of deficiency) to be redeveloped to alternative uses.</p>	<p>Option 1 has a more limited impact on SA Objectives as it only proposes contributions to green infrastructure in areas of open space deficiency. It does not consider the need to balance provision of open spaces with other borough targets such as housing and jobs.</p> <p>Option 2 appears to "score" open spaces according to quality which does not consider the value of green infrastructure to the local community.</p>	<p>SP9 is the most sustainable option since it not only safeguards existing open spaces from development but also promotes enhancements to the green infrastructure network. This option performs well against social objectives: SA Objectives 3 (health) and 6 (access to amenity). It is expected to have beneficial effects on environmental objectives: SA Objectives 11 (biodiversity), 12 (townscape and cultural heritage), 13 (landscape), 14 (water resources), 16 (climate change and reduction of flood risk) and 20 (sustainable modes of transport). The green infrastructure would contribute to biodiversity by providing corridors for species. Open spaces will help reduce flood risk because of their potential for flood storage and by absorbing surface water run-off. Green infrastructure networks can also contribute to sustainable transport by providing access routes for people. However, this option will restrict availability of land for housing development.</p>

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
			<p>Option1 will have a more limited effect on SA Objectives than the Preferred Option as it only proposes contributions to green infrastructure in areas of open space deficiency. However, it is expected to contribute positively to the following objectives: SA Objectives 3, 5, 6, 11, 12, 13, 14, 15, 16 and 17.</p> <p>Option 2 is likely to have negative effects on biodiversity (SA Objective 11). Poor quality open spaces, such as brownfield sites, may have biodiversity value. Redeveloping these sites could have adverse impacts on the landscape resources (SA Objective 13) as development may affect landscape character. Development of these spaces reduces opportunities to provide open spaces for recreational use (SA Objective 6) and to address flood risk (SA Objective 16) as these open spaces can serve as flood water storage in certain areas.</p>
SP10 Health and Wellbeing	There are no clear alternative options to promote health and well-being in the borough.	N/A	<p>SP10 addresses social objectives well, particularly SA Objective 2 (education), 3 (health), 4 (housing), 6 (access to services) and 8 (skills and training). It is likely to have indirect benefits towards SA Objective 9 (economic inclusion) by providing skills and training for residents so that they can find suitable jobs. The option is expected to contribute positively to environmental objectives 12 (townscape), 13 (landscape), 17 (air quality), 18 (CO2 emissions) and 20 (promote use of sustainable modes of</p>

Policies	Alternative options not selected	Reasons why not selected (as included in the Preferred Options Report)	SA Comments
			transport by encouraging walking and cycling). These potential improvements in environmental quality are likely to have positive effect on health.
SP11 Culture and Leisure	Option 1 will protect, promote and encourage the use of leisure and cultural facilities in the borough.	This option provides a narrow definition of sport and cultural facilities and does not fully embrace the borough's exceptional cultural heritage, which if not protected, could be lost. This option has a more limited contribution to SA Objectives since it aims solely to protect, promote and encourage use of existing facilities.	<p>SP11 performs well against social objectives: SA Objectives 3 (health), 5 (community cohesion), 6 (access to services) and may have indirect beneficial contribution to SA Objectives 7 (economic growth) and 10 (Town centres). Provision of new workspaces and cultural venues that support cultural businesses could result in other, related business opportunities. Developing cultural quarters in Wood Green and Tottenham is likely to contribute to the vitality of these areas.</p> <p>Option 1 has potential for a more limited contribution to SA Objectives (3, 5, 6, 7 and 8) since it aims to protect, promote and encourage the use of existing facilities.</p>
SP12 Community Infrastructure	There are no clear alternative options having regard to the London Plan policy.	N/A	SP12 is expected to perform well against the following SA Objectives: 2 (education), 3 (health), 5 (community cohesion), 6 (access to services) and 8 (skills and training). This option also provides an opportunity to redevelop previously developed land (SA Objective 15) for community facilities.

5 APPRAISAL OF THE STRATEGIC POLICIES

5.1 Introduction

Following the appraisal of the Preferred Options, the Pre-Submission Core Strategy has been produced, which includes new strategic policies and has amended others to take account of earlier SA recommendations. The new policies are: SP4 – Working towards a Low Carbon Haringey, SP5 - Water Management and Flooding, SP9 - Improving skills and training to support access to jobs and community cohesion and SP17 - Delivering and Monitoring the Core Strategy. Overall, the Core Strategy's sustainability has been strengthened through greater consideration of environmental issues and incorporating many of the recommendations made in the SA on the Preferred Options, in particular:

- The previous policy on environment has been divided into two new policies, SP4 on Working towards a Low Carbon Haringey and SP5 on Water Management and Flooding, providing more detail and identifying measures on how the Council seeks to address these issues.
- The policy on green infrastructure has been expanded to cover open spaces, biodiversity and children's play space. This policy (SP13 Open Space and Biodiversity) also now includes more measures to contribute to biodiversity and for opportunities for children's play space.
- Policy SP1 Managing Growth has been expanded. As well as discussing growth areas it also looks at those areas that will experience limited change and seeks to ensure that development in other areas, mainly residential and Conservation Areas consider the character of those areas.
- The policy on design (SP11) now promotes incorporating solutions to reduce crime and fear of crime by applying 'Secure by Design' measures. This policy also now includes sustainable design and construction and methods (e.g. solar design, better insulation).
- Conservation policy (SP12) now considers developments outside conservations and their impacts on their setting.
- Provision of lifelong learning facilities into SP16 (Community Facilities).
- A new policy, SP17 Delivering and Monitoring the Core Strategy outlines how the Council will deliver the infrastructure and facilities needed to support growth.

5.2 Approach to Appraising Draft Policies

The Preferred Options policies presented within the Pre-Submission Core Strategy were appraised during December 2009 and January 2010. The Pre-Submission Core Strategy contains a set of draft strategic policies under each Core Strategy theme:

People at the Heart of Change

- SP1 – Managing Growth.
- SP2 – Housing.
- SP3 – Gypsies and Travellers.

An environmentally sustainable future

- SP4 – Working towards a Low Carbon Haringey.
- SP5 – Water Management and Flooding.
- SP6 – Waste and Recycling.
- SP7 – Transport.

Economic vitality and prosperity shared by all

- SP8 – Employment.
- SP9 – Improving skills and training to support access to jobs, community cohesion and inclusion.
- SP10 – Town Centres.

Safer for all

- SP11 – Design.
- SP12 – Conservation.
- SP13 – Open space and biodiversity.

Healthier people with a better quality of life

- SP14 – Health and Well-being.
- SP15 – Culture and Leisure.

Delivering and Monitoring the Core Strategy

- SP16 – Community Infrastructure.
- SP17 – Delivering and Monitoring the Core Strategy.

The social, economic and environmental effects of the strategic policies were assessed against the SA Objectives using a matrix. The matrices are presented in Appendix E. A summary table of the assessment is presented in Table 5-1 below. The new policies are indicated in blue. Summaries of the results of the appraisals are discussed in the following sections.

The notation for the appraisal is set out below:

Major Positive Impact	This policy contributes substantially to the achievement of the SA Objective	++
Positive Impact	This policy contributes partially to the achievement of the SA Objective but not completely.	+
Neutral/ No Impact	There is no clear relationship between the policy and/or the achievement of the SA Objective or the relationship is negligible.	0
Positive and negative outcomes	The policy has a combination of both positive and negative contributions to the achievement of the SA Objective.	+/-
Uncertain outcome	It is not possible to determine the nature of the impact as there may be too many external factors that would influence the appraisal or the impact may depend heavily upon implementation at the local level. More information is required to assess the impacts.	?
Negative Impact	The policy is partially detrimental to the achievement of the SA Objective.	-
Major Negative Impact	This policy is substantially detrimental to the achievement of the SA Objective	--

Table 5-1: Summary of Appraisal of Policies

SA Objectives	Strategic Policies																
	SP1 Managing Growth	SP2 Housing	SP3 Gypsies and Travellers	SP4 Working towards Low Carbon Haringey	SP5 Water Management & Flooding	SP6 Waste and Recycling	SP7 Transport	SP8 Employment	SP9 Improving Skills & training to support access to jobs and community cohesion and inclusion	SP10 Town Centres	SP11 Design	SP12 Conservation	SP13 Open Space and Biodiversity	SP14 Health and Well-Being	SP15 Culture and Leisure	SP16 Community Infrastructure	SP17 Delivering and Monitoring the Core Strategy
1. To reduce crime.	+	+	0	0	0	0	+	-/+	0	-/+	+	+/?	0	0	+/?	+	+
2. To improve levels of educational attainment for all age groups and sections of society.	0	0	0	0	0	0	+	0	+	0	0	0	0	0	?	+	+
3. To improve physical and mental health for all and reduce health inequalities	+/-	+	+	+	+	0	+	+	+	+	+	0	+	+	+/?	+/?	+
4. To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents.	+	+	+	+	+	0	+	+	0	+	+	0	-	+	0	0	+
5. To protect and enhance community spirit and cohesion.	+	+	-/?	+	0	0	?	+	+	+	+	+/?	+	0	+	+	+
6. To improve access to services and amenities for all	+	+/-	+	0	0	0	+	+/?	+	+	+	+	+	+	+	+	+
7. To encourage sustainable economic growth and business development across the borough.	+	?	0	+	0	0	+	+	+	+	+	0	0	0	+	+	+
8. To develop the skills and training needed to establish and maintain a healthy labour pool.	+/?	?	0	0	0	0	0	+	++	+	0	0	0	0	+/?	+	+
9. To encourage economic inclusion.	?	?	0	0	0	0	0	+	+/?	+	0	0	0	+	?	?	?
10. To improve the vitality and vibrancy of town centres.	+	+	0	0	0	0	+	+	+	+	+	+	0	0	+	+	+
11 To protect and enhance biodiversity.	?	+/-	-/?	?	+	0	+	0	0	0	+	+	+	0	?	0	0
12. To protect and enhance the borough's townscape and cultural heritage resources	-/+	+	-	+	+	+	0	+/-	0	+/-	+	+	+	0	+/?	+/?	+/?
13. To protect the borough's landscape resources.	+	+	-	0	+	+	+	?	0	+/-	+	+	+	+	0	?	-/?
14. To protect and enhance the quality of water features and resources.	-	-	-	0	+	0	0	+/-	-/?	-	?	0	+	0	0	0	0
15. To encourage the use of previously developed land.	+	+	-	0	0	+	0	0	0	+	0	0	+	0	+	+/?	?

SA Objectives	Strategic Policies																
	SP1 Managing Growth	SP2 Housing	SP3 Gypsies and Travellers	SP4 Working towards Low Carbon Haringey	SP5 Water Management & Flooding	SP6 Waste and Recycling	SP7 Transport	SP8 Employment	SP9 Improving Skills & training to support access to jobs and community cohesion and inclusion	SP10 Town Centres	SP11 Design	SP12 Conservation	SP13 Open Space and Biodiversity	SP14 Health and Well-Being	SP15 Culture and Leisure	SP16 Community Infrastructure	SP17 Delivering and Monitoring the Core Strategy
16. To adapt to climate change.	-	-	-	+	+	0	+	-	-	-	+	0	+	0	0	0	0
17. To protect and improve air quality.	-/+	-/+	-	+	0	0	?	-	-	-/+	+	0	+	+	0	0	-/?
18. To limit climate change by reducing CO ₂ emissions.	-	-/?	-	+	0	0	?	-	-	+/-	+	0	+	+	0	0	0
19. To ensure sustainable use of resources	-	-/+	-	+	+	+	-/+	-	0	-	+	0	+	+	+	-/?	-/?
20. To promote the use of sustainable modes of transport.	+	+	-	0	0	0	+	+/-	+/-	+/-	0	0	+	+	0	?	+/-

5.3 Appraisal of Policies

5.3.1 Appraisal Summary

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 Core Strategy 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 Core Strategy.

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, 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 the 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.
 - SA 4 – 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.

5.3.2 Detailed Appraisal of the Strategic Policies

The following sections present the findings of the appraisal. Policies have been grouped according to the Community Strategy themes and the findings for each group are presented. Then the main findings of the detailed appraisal for each policy are discussed.

People at the Heart of Change

Summary of Potential Effects

The Managing Growth (SP1) policy provides the overall approach behind development in the borough and proposes how the Core Strategy policies will contribute towards sustainable development. This policy provides the sustainability context to the rest of the Core Strategy and for the forthcoming DPDs to be prepared by the borough. The key potential positive effects which could result from the People at the Heart of Change policies include:

- Regeneration of areas suffering from physical, social and economic deprivation (Haringey Heartlands, Tottenham Hale, Seven Sisters, Northumberland Park and Wood Green) which should help alleviate poverty , achieve social equity and improve the quality of life for most deprived residents.
- Concentrating growth in a few areas with existing facilities and services should minimise the need to travel and make the most efficient use of the existing resources.
- Provision of a significant number of affordable homes should assist in alleviating current need and associated deprivation – approximately 4,865 affordable dwellings a

year would be provided for the next five years. These will be of a mixture of dwelling types and tenure to meet the borough's needs.

- Provision of transport, social infrastructure and community facilities.
- Improvements to the public realm, improved pedestrian linkages to Wood Green and Haringey Heartlands and provision of green infrastructure projects;
- Introduction of measures to reduce flood risk in Tottenham Hale, through re-culverting of the Moselle Brook, application of sustainable drainage systems and supporting measures to reduce water consumption.
- Creation of a new Green Industries Centre at Marsh Lane, which will facilitate a borough-wide recycling facility.
- Commercial regeneration of key locations (Northumberland Park) and promotion of mixed use and employment generating uses in town centres (Wood Green) should result in economic and social benefits

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 Draft Core Strategy 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.

Further details are included below on how each policy addresses Sustainability Objectives.

Policy SP1 – Managing Growth

This policy performs well against a range of social and economic objectives by proposing to provide employment and housing in areas which have suffered from continued decline in manufacturing and characterised by deprivation, such as Tottenham Hale. It also seeks to bring back underused brownfield land, as in Wood Green, which means it performs well against SA Objective 15 relating to use of land resources. However, the scale of development is likely to have negative environmental impacts (e.g. increase in traffic, energy and water use) but there are other policies in the Core Strategy that seek to address these impacts.

Recommendations: This policy would be improved by adding reference to sustainable construction and addressing flood risk.

Policy SP2 – Housing

This policy sets out plans to deliver homes from 2011/12 to 2026. These are in line with London – wide target from 2007-2017. It performs well against the Housing SA Objective by seeking to improve the quality of new housing developments, to address the housing needs of families and those with special housing requirements (e.g. disabled, black and minority) and to deliver as many affordable homes as possible to address the issue of the shortfall of 4,865 affordable dwellings per year for the next five years. This policy will address the problem of 42% of Council stock not meeting Decent Homes Standards, as identified in a survey of the Council's stock in March 2008 by seeking to apply housing standards, such as CABE's Building for Life and the Communities Agency's Design and Quality Standards. The policy supports SA Objectives relating to health and wellbeing (SA 2) by promoting good quality housing design, which is likely to improve well being. By applying the Code for Sustainable Homes standards, this policy will also support environmental objectives through sustainable construction.

Recommendations: This policy would be improved by adding reference to sustainable construction methods for refurbishments or redevelopments.

Policy SP3 – Gypsies and Travellers

This policy seeks to protect existing lawful sites, plots and pitches for Gypsies and Travellers and to identify additional sites. It provides for facilities in terms of access, connection to utilities and services. It supports social and housing objectives relating to travellers. The policy seeks to address potential impacts on surrounding areas and communities. This policy, however, relates to provision of sites relating to housing and could be a sub section of SP2 rather than a separate policy.

Recommendations: This policy should be included within Policy 2 on housing.

An Environmentally Sustainable Future

Summary of Potential Effects

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).

Further details are included below on how each policy addresses Sustainability Objectives.

Policy SP4 – Working towards a Low Carbon Haringey

This policy requires new developments to be designed to high standards of energy efficiency and to achieve a reduction in carbon emissions through decentralised energy networks and on site renewable technologies and retrofitting existing housing stock. It provides target levels of Code for Sustainable Homes and BREEAM and when these should be achieved. This policy strongly supports environmental objectives relating to climate change, air quality, CO₂ emissions and sustainable use of resources. It will also have indirect effects on SA Objectives relating to health and housing.

Recommendations: This policy would be improved through the addition of text on measures to reduce energy requirements with regard to retrofitting.

Policy SP5 – Water Management and Flooding

This policy seeks the sustainable use of water and reduce the potential for flooding by requiring flood risk assessments of all sites of high flood risk, carry out local Surface Water Management Plans and implement Sustainable Drainage Systems and restore and enhance Pymmes Brook, Moselle Brook, the River Lee and its' tributaries. It contributes to a number of environmental SA Objectives relating to water resources, adaptation to climate change, biodiversity, built and historic environment and is likely to support social objectives with regard to health, community facilities and infrastructure and housing.

Recommendations: This policy would be improved through addition of text to encourage SuDS which provide ecological benefit. The policy should also make provision for vulnerable groups who may be at risk from flood events, such as the elderly.

Policy SP6 – Waste and Recycling

This policy sets out measures to ensure self-sufficiency in waste management capacity; minimise waste creation; safeguard waste sites, require well designed recycling facilities, design new waste management facilities and require Site Waste Management Plans for major applications. It supports the incorporation of recycling facilities to be incorporated in new developments. The policy suggests that good design of new waste management facilities is the key to addressing pollution and nuisance issues. However, the policy needs to be clearer about the type of waste management facilities and how this would reduce or mitigate adverse impacts. This policy states that these will be detailed in the Development Management DPD but there will be uncertainty in the short term because the Development Management DPD will be adopted after the Core Strategy.

Recommendations: This policy would be improved by clarifying how good design of waste management facilities would mitigate impacts, particularly air pollution.

Policy SP7 – Transport

This policy performs well against the sustainability objectives and the effects are likely to be mostly positive. Many of the positive effects relate to reducing dependence on the private car by reducing the need to travel and by promoting walking, cycling and public transport as alternative modes. The key potentially positive sustainability effects arising from this policy include:

- Improved equality of access in the borough by improving transport facilities for those without access to a car and making access safer and easier for those using public transport, walking and cycling.
- Promotion of public transport, walking and cycling by promoting key infrastructure will have the following beneficial effects.
 - Beneficial health effects as a result of more active lifestyle.
 - Reduced air and noise pollution (including the indirect positive impact on habitats and species).
- Locating major trip generating developments in locations with good access to public transport would have beneficial effects of reducing the need to travel will:
 - Improve the quality of life and wellbeing of the local community.
 - Improve the accessibility of employment, services and facilities.
 - Mitigate the effects of climate change.

However, there are limited potentially negative sustainability effects arising from SP8, which include:

- Noise and disturbance in town centres as a result of increased densities and good public transport accessibility.
- Localised effects on the environment and amenity of local residents associated with transport infrastructure development.
- Increased connectivity through bus and cycle routes could encourage commuting out of the borough rather than benefiting the local economy.

Recommendations: This policy would be improved by promoting a network of cycling and walking routes throughout the borough.

Economic vitality and prosperity shared by all

Summary of Potential Effects

The policies under this key objective seek to encourage the expansion of employment and business opportunities to create a more diversified economy and the development of town centres, including Wood Green. Although employment related developments have the potential to have beneficial economic effects, they will potentially have negative environmental impacts and implications on resource use, energy use and waste generation.

The development of Wood Green and other centres and employment areas may increase traffic in those areas. The improvement of skills and training (SP9) policy is generally positive and efforts to promote improvement in training facilities is likely to support businesses and employment opportunities.

The key potential positive effects from these *Economic Vitality* policies include:

- Protecting existing employment land uses is likely to ease pressure on Greenfield sites for employment development.
- Facilitating training opportunities for the local population.
- Promoting diversification of the borough's economy and supporting industries and small and medium sized enterprises.
- Environmental and amenity improvements through the reuse/redevelopment of employment land in regeneration areas.
- Better employment opportunities in the borough could reduce the need to travel.

Key potentially negative effects from the *Economic Vitality* policies include:

- Promoting certain types of industries, such as distribution uses may generate freight and lorry traffic which could result in increase in road traffic, noise and pollution.
- Increase in water consumption and pollution by businesses and industrial use.
- Increase in energy use through increased business and industrial activities.
- Increased retail activity may increase waste production and resources use.
- Developing Wood Green as a centre for north London may generate trips from outside Haringey. However, the development of the district centres may reduce travel within the borough.

Further details are included below on how each policy addresses Sustainability Objectives.

Policy SP8 – Employment

The overall effects of this policy are quite mixed. There is emphasis on protection and expansion of employment and business opportunities. While such developments are likely to have beneficial economic effects and create employment, they are also likely to have potential negative environmental effects on resource use. 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;
- Provision of sites for housing and alternative uses (e.g. mixed use development in Campsbourne, Hale Wharf, Millmead/Ashley Road Extension, Tottenham Hale, Wood Green and Rangemoor Road/Herbert Road).

The key potentially negative sustainability effects from the policy 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.
- Increased water consumption and pollution by business and industrial land use.
- Increased business and office developments will increase energy use.
- Defined employment areas within Central Leaside

Recommendations: This policy would be improved by adding text referring to sustainable construction for redevelopments of obsolete industrial sites. Ensure that employment opportunities, particularly in Central Leaside boundary, which will be protected against redevelopment and retained for employment use, should prioritise local residents.

Policy SP9 – Improving skills and training to support access to jobs and community cohesion and inclusion

This policy seeks to address unemployment by facilitating training opportunities for the local population and support employment sectors such as green industries, small and medium enterprises.

The key potential positive effects from this policy include:

- Reducing access to jobs through training facilities.
- Indirect effect of improving community cohesion through provision of employment opportunities.
- Encouraging provision of training facilities in high unemployment areas such as Tottenham Hale and Haringey Heartlands.

Key negative effects arising from this policy include:

- New and expansion of activities in the employment sector could lead to increase in waste, energy and resources use.

Recommendations: This policy would be improved by adding text referring to sustainable construction of new developments for employment. Ensure that the training programmes are appropriate for the needs of employers.

Policy SP10 – Town Centres

Generally, this policy for promoting retail growth across the borough, particularly at Haringey Heartlands and Tottenham Hale and town centres, is predicted to have indirect positive effects on reducing poverty and social exclusion in the long term. In the short term, this policy will seek to improve town centres which are currently overcrowded and where negotiating traffic is difficult. It will have positive effects on housing by providing for housing in Wood Green and other centres.

The key positive effects arising from this policy include:

- Attracting new businesses through high profile development in the redevelopment of the Tottenham Hotspur Football Club.
- Environmental and local amenity improvements in town centres through redevelopment.
- Delivery of more jobs with indirect benefits in reducing exclusion and deprivation.
- Encouraging residential development in Wood Green and other centres would contribute to the vitality of the centres as well as natural surveillance, which could indirectly reduce crime.

The key negative effects arising from this policy include:

- Increased retail activity could lead to increased waste, resource use and packaging.
- A major centre at the Tottenham Hotspur Football Club is likely to generate trips within and from outside Haringey.

- Increase in retail activities in some centres (Tottenham High Road/Bruce Grove; West Green Road/Seven Sisters Road) may increase traffic in these centres.

Recommendations: This policy would be improved by adding text referring to sustainable construction for redevelopments or retrofitting.

Safer for all

Summary of Potential Effects

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.

Further details are included below on how each policy addresses Sustainability Objectives

Policy SP11 – Design

This policy generally performs well against the sustainability objectives and the effects are likely to be mostly positive, with a limited number of negative effects predicted. The key potential positive sustainability effects arising from this policy include:

- Enhanced public realm, townscape and landscape, particularly in regeneration areas with low quality (e.g. Tottenham Hale, Seven Sisters) which in turn could have social and economic benefits. These include: enhanced community image; improved quality of life and well being of residents; and potential to attract businesses and employment uses to the area.
- Contribution to biodiversity through the provision of green and brown roofs.
- Improved health as a result of better quality, greater provision and easy access to public spaces.
- Reduction in crime by promoting the principles of 'Secure by Design'.
- Improved access to buildings and places;
- Requiring sustainable design and construction to minimise consumption of materials and resources and promote energy efficiency.

The key negative effects from this policy are very limited but include:

- Local environmental impacts, for example visual, light, noise and traffic from developments.

Recommendations: This policy would be improved by adding text referring to sustainable construction for redevelopments or retrofitting. The policy should also incorporate SuDs, waste management and water reduction measures.

Policy SP12 – Conservation

This policy performs very positively against environmental SA Objectives relating to townscape and landscape. The policy is considered to have a neutral performance relating to air quality, adaptation to climate change, energy, water resources and waste. The key potential positive effects arising from this policy include:

- Enhanced townscape, which can have social and economic benefits. These include indirect benefits: enhanced community identity; enhanced quality of life and well being for local residents; and provision of conditions that may attract business to the area.
- Improved health as a result of access to conserved and enhanced historic parks and gardens and improved environmental quality.
- Protection and enhancement of biodiversity in parks and gardens.

Key negative impacts of this policy are limited but include:

- Local environmental impacts (light, noise and increase in traffic) of developments in Conservation Areas.
- Protecting buildings of architectural or historical interest limits re-use or change of use.
- Conservation and preservation may limit measures to address climate change and incorporation of flood alleviation measures, such as SuDS.

Recommendations: This policy would be improved by adding text referring to sustainable construction for redevelopments or retrofitting.

Policy SP13 – Open Space and Biodiversity

This policy performs very well against most of the social and environmental SA Objectives, in particular biodiversity, health and landscape. It is also likely to have a positive effect on the quality of surroundings in the borough. There are indirect benefits: in terms of adaptation to climate change, as open spaces can store water during flooding and attractive open spaces can attract businesses to the area. The key potential benefits of this policy include:

- Enhanced public realm, townscape and landscape, in particular in areas of low quality and improving provision of in areas of deficiency (particularly in the east of the borough (i.e, Northumberland Park, parts of White Hart Lane ward and parts of Bounds Green ward) where quality and amount of provision is poorer).
- Improved health as a result of better quality, greater provision and easier access to open spaces and outdoor play areas and opportunities for sport and recreation, promotion of walking and cycling through the green infrastructure network and enhanced environment setting.

- Conserving and enhancing biodiversity and promoting wider access to nature conservation.
- Creation of wildlife and ecological habitats through brown and green roofs.
- Protection and enhancement of waterways, which link open spaces.
- Improved access through the green infrastructure network.
- Protection of designated sites from development.

Key negative effects are limited but include:

- Potentially restricting availability of land for residential, industrial and business uses by providing new and protecting existing open space.

Recommendations: This policy would be improved by adding text highlighting the need for access and use by the disabled. It should also add text requiring developers to avoid and mitigate any impacts of major developments. This policy should also include a provision that designated sites will be protected from the adverse impacts developments, particularly those adjacent to or near the Lee Valley Ramsar site. The policy could also include reference to protecting wildlife corridors and green links. Improvements in green infrastructure could also promote opportunities for community engagement and projects to encourage people to be more active (e.g. walking, cycling and exercise).

Healthier people with a better quality of life

Summary of Potential Effects

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).

Further details are included below on how each policy addresses Sustainability Objectives

Policy SP14 – Health and Wellbeing

This policy contributes positively to the achievement of the SA Objective on health, particularly in combination with other policies in the Core Strategy which also play a part in

promoting good health and addressing health inequalities (i.e., housing (SP2), open space and children's play spaces (SP13), encouraging walking and cycling (SP7), providing jobs and opportunities (SP8) and reducing air and noise pollution impacts (SPs 4, 5, 6 and 7). The key positive effects of this policy include:

- Improved health as a result of greater provision and easier access to new and improved health facilities.
- Reduction of inequality by prioritising interventions and resources to deprived areas, which tend to experience poorer health, such as North East Tottenham.
- Improvement in primary health care facilities in some areas which require modernisation, such as those in some parts of Tottenham.

Key negative effects of this policy are limited but include:

- Potentially restricting the availability of land for housing, industrial or business uses by providing health facilities and infrastructure.

Recommendations: The policy should promote the location of health facilities near public transport modes.

Policy SP15 – Culture and Leisure

This policy performs well against social and economic SA Objectives, particularly those relating to health, access to services and amenities and will seek to address existing deficiencies relating to provision of facilities for outdoor sports. It will support town centres, townscape, community cohesion and sustainable use of resources by promoting multi-use of buildings. The key positive potential effects of this policy include:

- Encouraging community engagement and cohesion through the provision of cultural facilities and venues.
- Attracting new cultural industries through the development of cultural quarters at Wood Green and Tottenham.
- Employment opportunities through the provision of new work spaces.
- Improved health due to improvements in sports facilities; particularly in areas of deficiencies.
- Improvements to sports facilities in areas of deficiencies.

Key negative potential effects of this policy include:

- Restricting the use of land for housing use by developing land for business or cultural use.
- Increase water consumption, energy use and pollution by business and industrial use.

Recommendations: This policy would be improved by promoting the location of health facilities near public transport modes.

Policy SP16 – Community Infrastructure

This policy contributes positively to social and economic SA Objectives, particularly those relating to health, education and training and access to services and amenities. The policy is likely to have an indirect beneficial effect on the local economy as it may encourage businesses to the area. Although the policy will contribute to the sustainable use of resources by advocating multi-use of community facilities, provision of new facilities would require use of resources. Potential impacts of developments are addressed in other policies in the Core Strategy (SP4 - Working towards a Low Carbon Haringey), SP5 – (Water

Management and Flooding and SP11 - Design). The key positive potential effects of this policy include:

- Protecting and enhancing community facilities which support those in most deprived areas and providing a new primary school at Tottenham Hale.
- Improved provision of education and training facilities.
- Improved skill and education levels may encourage businesses to locate in the borough.
- Reduced trips to facilities elsewhere if local facilities are in accessible locations.
- Employment generation from new education and community facilities.

There are no potentially sustainability effects predicted to arise from the Community Facilities policy, apart from the localised environmental and amenity impacts of the provision of new facilities.

Recommendations: This policy would be improved by promoting the location of health facilities near public transport modes. It should also make it clear that the facilities should be accessible to all.

Policy SP17 – Delivering and Monitoring the Core Strategy

This policy performs well against objectives which relate to the provision of infrastructure, services and facilities. Its contribution to environmental SA Objectives such as air quality, climate change and sustainable use of resources are uncertain. It is acknowledged that other policies in the Core Strategy address environmental issues and Planning Obligations have been put forward for mitigating the impacts of a development. The key positive contributions of this policy include:

- Improved facilities and infrastructure, particularly in growth areas and deprived parts of the borough.
- Increased provision of affordable housing.
- Environmental and local amenity improvements through provision of public realm and spaces and regeneration.
- Improvement in education, training and skills.
- Improved health from provision of health facilities;

There are no major negative impacts from this policy apart from the localised environmental impacts as a result of development of infrastructure and facilities.

Recommendations: This policy would be improved by adding text regarding the transport infrastructure it will deliver. The policy should provide more detail on environmental improvements it would require under Planning Obligations. It discusses the infrastructure and facilities required by development in growth areas but also needs to address the needs of other areas and how these services are to be delivered.

5.4 Cumulative Impacts

Once the predicted effects of the Core Strategy policies had been carried out, an analysis was made of the cumulative impacts of policies. Beneficial cumulative effects are expected relating to:

- The provision of housing and services (policies on growth, housing, community facilities and delivery) which will contribute to the long-term housing needs of the borough.
- A number of policies (housing, community facilities, open space) are likely to contribute to improved health in the long-term.
- Improvement of access to services (policies on growth, community facilities, town centres, delivery).
- Provision of opportunities for leisure (policies on culture and leisure, open spaces).
- Improvement of the public realm (policies on design, open spaces, community facilities).

However, potential adverse cumulative effects can result from growth and development contained in policies, which include:

- Increase in water and energy consumption.
- Increase in travel and reduction in air quality.
- Increase in risk of flooding.

Table 5-2 overleaf presents the potential cumulative impacts from policies.

Table 5-2: Cumulative Impacts of Strategic Policies

SA Objective	Cumulative Effects of Strategic Policies
1. To reduce crime, disorder and fear of crime	Strategic Policy 11 (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.
2. To improve levels of educational attainment for all age groups and all sectors of society	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). SP1 (Managing growth) will ensure that new facilities will be provided in growth areas. SP7 (Transport) will have an indirect positive contribution by improving access.
3. To improve physical and mental health for all and reduce health inequalities	Potential positive effects are likely from SP 2 (Housing), 11 (Design), 13 (Open Space and Biodiversity), SP14 (Health and Well-being), SP15 (Culture and Leisure) and SP16 (Community Infrastructure).
4. To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	SP2 (Housing) provides for maximising housing provision and providing to meet different housing needs. This policy is expected to strongly contribute to this SA Objective. Furthermore, SP 1 (Managing Growth) directs growth, which includes housing, to areas of opportunity and deprived areas (Tottenham Hale, Seven Sisters Corridor and Northumberland Park). SP10 (Town Centres) seeks to provide housing through town centre expansion and intensification. In combination, these policies will contribute to housing provision in the borough.

SA Objective	Cumulative Effects of Strategic Policies
5. To protect and enhance community spirit and cohesion	A number of policies support this Objective. SP 1 (Managing Growth) and SP16 (Community Infrastructure) provides for community facilities and SP15 (Culture and Leisure) promotes cultural venues, which may facilitate engagement. SP11 (Design) may help improve community identity. 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.
6. To improve access to services and amenities for all groups	<p>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. This policy is expected to address this SA Objective well.</p> <p>Other policies which are likely to contribute cumulatively to this SA Objective are: SP13 (Open Space and Biodiversity) provides improvements to the network of green spaces, increasing access to amenity. SP 16 (Community Infrastructure) will ensure that community, health and education are provided to meet local needs. SP 10 (Town Centres) which supports expansion and intensification of town centres would allow new residents to have access to services in these centres.</p>
7. To encourage sustainable economic growth and business development across the borough	SP8 (Employment) is expected to have positive cumulative effects on the economy by protecting employment land and promoting other forms of employment. Other policies likely to contribute to this SA Objective are SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion) and promoting employment in green industries, small and medium enterprises, SP10 (Town Centres) expansion and intensification and SP15 (Culture and Leisure – development of cultural quarters at Wood Green and Tottenham). These policies provide opportunities for new business opportunities.
8. To develop skills and training needed to establish and maintain a healthy labour pool	A number of policies seek to address this Objective. 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.
9. To encourage economic inclusion	SP8 (Employment), by protecting and enhancing employment land and promoting other forms of employment, SP9 (Improving skills and training) and supporting green industries, small and medium sized enterprises and SP15 (Community Infrastructure) would provide opportunities for jobs and training which could potentially contribute to this SA Objective.
10. To improve the vitality and vibrancy of town centres	SP10 (Town Centres), which proposes expansion and intensification of town centres, is expected to contribute to their 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 in these areas.

SA Objective	Cumulative Effects of Strategic Policies
11. To protect and enhance biodiversity	SP 13 (Open Spaces and Biodiversity) safeguards open spaces from development, seeks creation of new open spaces, protects of the green infrastructure and promotes enhancement to habitats and designated areas. SP11 (Design) promotes green and brown roofs. SP12 (Conservation) also 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: SP 1 (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.
12. To protect and enhance the borough's townscape and cultural heritage resources	SP11 (Design) proposes high quality design and improvement of public realm and SP12 (Conservation) which proposes to enhance conservation areas and listed buildings, are all expected to have a cumulative positive contribution to this SA Objective.
13. To protect and enhance the borough's landscape resources	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. In combination, these policies are expected to have a cumulative positive impact on this SA Objective.
14. To protect and enhance the quality of water features and resources	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 Lea.
15. To encourage the use of previously developed land	SP10 (Town Centres expansion) is expected to develop previously developed land. Also, SP 1 (Managing Growth) directs development to regeneration areas (Haringey Heartlands, Tottenham Hale, Seven Sisters and Wood Green Metropolitan Centre), likely to have PDLs. This policy would strongly contribute to this SA Objective.
16. To adapt to climate change	SP 4 (Working towards a Low Carbon Haringey) and SP5 (Water Management and Flooding) are likely to address energy use and flood risk. However, some areas of change are in or near flood risk zones (Tottenham Hale, Northumberland Park) and so the SP 1 (Managing Growth) which directs development to the area could have significant adverse impact on this SA Objective through the cumulative loss of flood plain.
17. To protect and improve air quality	SP7 (Transport) could have a positive cumulative impact on air quality in the long term by reducing car dependency. Also, SP 1 (Managing Growth) and SP10 (Town Centres) directs growth to regeneration areas and town centres which should reduce travel and indirectly contribute to this SA Objective. In addition, SP7 seeks to promote public transport, walking and cycling and makes a commitment that the Council will support measures to influence behavioural change.
18. To limit climate change by reducing CO ₂ emissions	Policies likely to contribute to this SA Objective are: SP 4 (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.

SA Objective	Cumulative Effects of Strategic Policies
19. To ensure the sustainable use of natural resources	SP 1 (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) promotes reduction in water use. In combination, these policies are likely to reduce potential adverse impacts.
20. To promote the use of sustainable modes of transport	SP7 (Transport) promotes public transport, cycling and walking, which may reduce car use. Other policies which could potentially contribute to this Objective are: SP 1 (Managing Growth) promoting growth in regeneration areas and SP10 (Town Centres) intensification to include housing) by reducing the need to travel.

5.5 Mitigating Adverse Effects and Maximising Beneficial Effects

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. Mitigation can take a variety of forms, including:

- Refining policies to improve the likelihood of positive effects or to minimise adverse effects. This includes rewording of policies or additions to text. This could also mean requiring policies to mitigate against the negative impacts of others.
- Technical measures to be applied during implementation (e.g. Environmental Impact Assessment (EIA) requirement; SP11 - Design).
- Arrangements for addressing possible adverse effects (Planning Obligation to provide contribution towards facilities or open space elsewhere).

Specific mitigation measures to address potential impacts on SA Objectives include 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.
- Cross reference to other policies to strengthen sustainability provisions- for example, SP1 should refer to other policies to reduce energy or water use (SP4 – Working towards a Low Carbon Haringey or SP5 – Water Management and Flooding).

More detailed mitigation measures to address potential impacts of policies are set out in the appraisal tables in Appendix F.

5.6 Monitoring

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 should:

- Measure the improvements on the baseline as a result of the DPD.
- Assess if the DPD is contributing to the SA Objectives.
- Assess effectiveness of mitigation measures.
- Identify any effects which may not have been foreseen in the initial assessment.

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 which identifies indicators has been developed. This framework will be updated for the Final SA for the Submission Core Strategy.

Table 5-3 presents the monitoring framework for the Core Strategy identifying the SA Objective, the significant effect that needs to be monitored and the indicators that should be used for the monitoring and the targets.

Table 5-3: Draft Monitoring Framework

Sustainability Objective	Significant Effect	Sustainable Development Indicator
1. To reduce crime, disorder and fear of crime	No significant effects predicted.	No additional targets from SA recommended.
2. To improve levels of educational attainment for all age groups and all sectors of society	No significant effects predicted.	No additional targets from SA recommended.
3. To improve physical and mental health for all and reduce health inequalities	Improved health facilities (SP14).	Increase in community perception of being in "good health" from 2001 Census.
4. To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	Increased housing development (SP2 and SP10).	Number/percentage increase in new housing developments completed. Number of new build affordable dwellings completed as a percentage of total housing completions. Percentage of new homes built to Lifetime Homes standards. Number of new gypsy and traveller sites completed.

Sustainability Objective	Significant Effect	Sustainable Development Indicator
5. To protect and enhance community spirit and cohesion	Reduced social exclusion and inequalities deprivation, including access to services and amenities (SP2, SP10, SP15 and SP16).	<p>Number of cultural programmes implemented per annum.</p> <p>General Index of multiple deprivation.</p> <p>Overall satisfaction with local area.</p>
6. To improve access to services and amenities for all groups	Improved access to services and amenities (SP1, SP7, SP10, SP13, SP15 and SP16).	<p>Index of multiple deprivation (Barriers to Housing and Services Domain).</p> <p>Level and types of planning obligations relating to facilities provision received.</p> <p>Percentage of new residential development within 30 minutes public transport time of a GP, hospital, primary and secondary school, employment and major health centre.</p> <p>Amount of completed retail, office and leisure development.</p> <p>Percentage of completed retail, office and leisure development in town centres.</p> <p>Percentage of eligible open spaces managed to green flag award standard.</p>
7. To encourage sustainable economic growth and business development across the borough	Increased investment in regeneration areas (SP1, SP8 and SP10).	<p>Increase in number of VAT registered businesses.</p> <p>Reduction in unemployment rates.</p> <p>Total amount of additional floor space, by type.</p> <p>Total amount of additional floor space on previously developed land, by type.</p> <p>Amount of land developed for employment by type.</p> <p>Amount of land developed for employment, by type, which is in development and/or regeneration areas.</p>
	Loss of employment land (SP8).	Amount of employment land lost to residential development.

Sustainability Objective	Significant Effect	Sustainable Development Indicator
8. To develop the skills and training needed to establish and maintain a healthy labour pool.	Improved skills among working age residents (SP8, SP9 and SP16).	Number and types of training programmes completed and jobs created. Qualifications of working age residents.
9. To encourage economic inclusion	Reduced unemployment (SP 8).	Amount of land developed for employment by type. Employment figures.
10. To improve the vitality and vibrancy of town centres	Increased investment in town centres (SP1, SP2 and SP10).	Rate of Zone A rental increases in town centres. Retail vacancy in town centres. Percentage change in the total number of VAT registered businesses in the area.
11. To protect and enhance biodiversity	Improvement in quality and provision of open spaces (SP13).	Percentage of eligible open spaces managed to green flag award standard. Amount of land provided as green infrastructure.
	Increased pressure on open spaces, biodiversity and habitats (SP1, SP2 and SP3).	Change in extent (hectares) of priority habitats and species (number). Meeting BAP targets.
12. To protect and enhance the borough's townscape and cultural heritage resources	Improved townscape and public realm (SP11, SP12 and SP14).	Area of townscape considered of low quality. Percentage of residents who are satisfied with their neighbourhood. Number of Listed Buildings and those at risk.
13. To protect the borough's landscape resources	Improved landscape (SP11 and SP13).	Percentage of eligible open spaces managed to green flag award standard. Area of landscape considered of low quality. Percentage of residents who are satisfied with their neighbourhood. Percentage of people living within 200m of open space.
	Increased pressure on open spaces (SP1 and SP2).	Change in extent (hectares) of open spaces. Area of outdoor sports land for community use. Loss of Greenfield land.

Sustainability Objective	Significant Effect	Sustainable Development Indicator
		Percentage of development on previously developed land.
14. To protect and enhance the quality of water features and resources	Increased water use (SP1 and SP2).	Number of new developments utilising SuDS and water re-use to minimise water consumption. Number of developments meeting Code for Sustainable Homes Level 4 and 5 Standards. Number of planning permissions granted contrary to the advice of the Environment Agency on either flood defence grounds or water quality.
15. To encourage the use of previously developed land	Increased use of previously developed land. (SP1, SP2 and SP10) to prioritise development on previously developed land.	Number of developments built on previously developed land. New and converted dwellings on previously developed land. Total amount of floor space on previously developed land, by type.
16. To adapt to climate change	Increased resource use, waste generation and CO ₂ emissions (SP1, SP2). SP4 has potential to reduce energy use. SP5 to address flood attenuation. SP11 to ensure improved standards of design and construction in development..	Number of new developments with Code for Sustainable Homes level 4 and BREEAM 'excellent' rating. Number of properties within flood zones. Number of planning permissions granted contrary to Environment Agency advice on flooding and water quality grounds. New housing developments incorporating SuDS. Renewable energy capacity installed by type.
17. To protect and improve air quality	Reduced air quality due to increase in traffic (SP1, SP2 and SP10). SP7 has potential to reduce the impact of growth and increased population by promoting public transport, walking and cycling.	Exceedances of statutory targets as reported through LBH's existing monitoring programme. Traffic levels per annum. Peak/off peak traffic flows and speed.
18. To limit climate change by reducing CO ₂ emissions	Increase in emissions due to scale of development (SP1, SP2 and SP10). SP7 to reduce energy use.	Exceedances of statutory targets as reported through LBH's existing monitoring programme. Per capita CO ₂ emissions in local authority area. Renewable energy capacity

Sustainability Objective	Significant Effect	Sustainable Development Indicator
		installed by type.
19. To ensure the sustainable use of natural resources	Increased resource use, waste generation and CO ₂ emissions through new development (SP1, SP2 and SP10).	Number of new developments with Code for Sustainable Homes level 4 and BREEAM 'excellent' rating. CO ₂ emissions from all sources. Percentage of energy from renewable sources. Domestic energy efficiency.
20. To promote the use of sustainable modes of transport	Improved public transport and increased walking and cycling (SP7).	Transport modal split. Access to public transport. PTAL score for new development. Number of new housing and business developments incorporating Green Travel Plans. Mode for journey to work. Number of passengers using rail and underground stations.

5.7 Potential Overall Effects

This section provides a brief summary of the most significant potential effects based on the findings of the appraisal.

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.

5.8 Difference the Process has Made

The SA and development of the Core Strategy has been an iterative process, with the findings of the SA informing the development of the options and policies. The SA process has ensured that the LBH's Core Strategy embodies the principles of sustainable development. For example, recommendations on the Issues and Options Report were made to LBH's Planning Officers to improve sustainability of options in addressing issues, which helped the Planning Officers in the further development of options. Furthermore, recommendations were made during the preparation of the SA on the Core Strategy Preferred Options to improve the sustainability of policy options, as described in Section 4 of the main report, which have informed the development of the draft strategic policies in the Pre-Submission Core Strategy. This SA presents the findings of the assessment of the strategic policies and makes recommendations.

5.9 Future Stages of Sustainability Appraisal

Following the consultation on the Core Strategy Pre-Submission document and this draft SA Report during May to June 2010, the comments received will be considered. Any significant changes to the policies will be appraised and inform the preparation of the Final SA Report.

The Final SA Report is a key output in the appraisal process and will present information and changes made during all stages of the appraisal. The report will also include the requirements of the Environmental Report necessary to meet the requirements of the SEA Directive.