

Factual Statement 4 – the Sustainability Appraisal

The means by which the Sustainability Appraisal has informed options and (discounted) alternatives leading to the submitted Core Strategy and, in particular, SP1

1. Introduction

- 1.1 Haringey's Core Strategy is considered to be the most appropriate approach for shaping the borough's future up to 2026. In line with PPS1 *Delivering Sustainable Development* and PPS12 *Local Spatial Planning*, the Core Strategy has been produced to ensure that sustainable development is treated in an integrated way, addressing the inter-relationship between social inclusion, protecting and enhancing the environment, the prudent use of natural resources and economic development.
- 1.2 In accordance with section 19(5) of the Planning and Compulsory Purchase Act, 2004, local development documents are required to be subject to a sustainability appraisal, which will incorporate the requirements of the Strategic Environmental Assessment Directive. Haringey's Sustainability Appraisal (SA) performed a key role in providing a sound evidence base for the Core Strategy and formed an integrated part of the plan preparation process. The SA did inform the evaluation of alternatives and demonstrates that the Core Strategy is the most appropriate given reasonable alternatives.

2. The Sustainability Appraisal Process

- 2.1 The Sustainability Appraisal plays a key role in assessing the economic, social and environmental impacts of the Core Strategy and considering the alternative policy options and long term policy approach at each stage of the Core Strategy process.
- 2.2 The SA process is an iterative process, which sought to appraise the Core Strategy during the various stages of plan development. The SA provided initial appraisals of options from the Issues and Options Report and during the development of the spatial options, which were incorporated into the development of each stage of the Core Strategy. The reports listed below present the detailed appraisals and the key, formal outputs of the process.
- 2.3 A SA Scoping Report was prepared 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 Development Plan Documents (DPD). Part Two consisted of separate chapters providing additional scoping information relevant to individual DPDs and SPDs, for example the Housing Supplementary Planning Document. The intention was to establish a sustainability appraisal framework that would include social, economic and environmental objectives that could be tailored for future Local Development Documents.

- 2.4 Following this Scoping Report, a broad range of Issues and Options were drafted. Haringey's Core Strategy Issues and Options Report (December 2007), presented five spatial objectives for the plan, and set out 78 questions for consideration which addressed the key challenges identified for the borough over a 15 year period. The Issues and Options were consulted on in February/March 2008. The methodology for carrying out the Sustainability Appraisal, as proposed at the Scoping stage, was used to test each of the objectives in the Issues and Options document and predict their significant positive and negative impacts on the SA Objectives
- 2.5 In response to the comments received in relation to the five spatial objectives, four broad spatial options for the future development of the borough were identified. These options represented alternative strategies for achieving the Council's vision for Haringey.
- 2.6 These four options each contributed towards achieving the spatial objectives, and reflected differing directions for the spatial development of the borough, and differing themes for sustainable growth and development. The options were:
- ***Option A – a borough wide spatial approach*** focusing on identified areas of change (specifically the two London Plan growth areas; Haringey Heartlands and Tottenham Hale). This option would seek to meet the need for new housing (London Plan 2008 target of 680 per annum), including affordable housing, by promoting development-infill and redevelopment at higher densities within the identified areas of change and other sustainable locations throughout the borough, retaining employment land and premises, protecting all open spaces and promoting the development of sustainable modes of transport.
 - ***Option B – east/central/west spatial approach.*** This option would seek to recognise the differing needs and challenges present in the east, central and western areas of the borough. This option would allow a focussed approach to the needs of the three individual areas but care would need to be taken to ensure that some of the areas developed are not at the expense of others in terms of housing, employment, environment, open space and transport.
 - ***Option C – housing led growth.*** This option would seek to secure significantly greater provision of new housing (beyond the London Plan target of 680) at higher densities through the borough than present, through comprehensive redevelopment, releasing identified surplus employment land and office floor space for residential/mixed uses, achieving balanced communities by promoting mixed use development in town centre locations, along with associated social infrastructure, and investigating in public transport.
 - ***Option D – economic regeneration*** through employment growth. This option would seek to achieve high level economic growth within the borough by releasing non-employment related sites for business uses in sustainable locations and along transport corridors, investing in substantial new physical infrastructure for local employment sites and

providing a wide range of community and leisure facilities as a result of development, with significant improvements in quality open space, the streetscape and living environment.

- **Option E – “market driven” approach.** This option consists of a ‘business as usual scenario’ defined as what is likely to happen without a Core Strategy to guide development.

2.7 The five options above were then subject to an initial sustainability appraisal to identify which options had addressed the SA Objectives well (Options Discussion Paper – Initial Sustainability Options Appraisal (October 2008)). This appraisal identified which option was the most sustainable in terms of being the most appropriate strategy for the borough over a 15 year period, taking into account the range of effects (both negative and positive) on the environment, as well as the positive effects of development in terms of economic benefits and social well being. The details of this assessment are provided in Section 4.3 of the main SA report. Following this appraisal, discussions with the Local Development Framework Members Advisory Group, feedback from the Issues and Options consultation and other key partners including Haringey’s Strategic Partnership (HSP), a combination of Options A and B was agreed as the preferred spatial approach and the most appropriate to shape the development of Haringey up to 2026.

Core Strategy Preferred Spatial Approach

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

- 2.8 The SA on the Preferred Options appraised the preferred and alternative policy options necessary to deliver the above agreed preferred spatial approach. It provided findings on which policy options were likely to address the SA Objectives and demonstrated that the approach was the most appropriate when considered against the reasonable alternatives. The findings are presented in Section 4.4 and Appendix D of the main SA report.
- 2.9 This preferred spatial approach formed the next stage of the development of the Core Strategy and the Council published the Preferred Options titled “A New Plan for Haringey 2011 – 2026” in May 2009. This document and the accompanying SA were consulted on from 5th May until 30th June 2009.
- 2.10 The New Plan for Haringey set out the vision, objectives, preferred policy options (and discounted policy alternatives) required to deliver the preferred spatial strategy for the borough. The 12 Strategic Policies (SP) put forward were considered to be the most appropriate in addressing the key challenges facing the future development of Haringey.
- 2.11 The overall approach to managing growth was set out in SP1. The aim of this policy was to focus growth in the identified areas of change and at other sustainable locations throughout the borough. Sustainable locations are those capable of accommodating high density development in proximity to public

transport nodes, where local distinctiveness and character of the area will be protected. Mixed use development will be encouraged at these locations. Wood Green Metropolitan Centre will accommodate a significant amount of growth including housing, retail, employment, cultural, health, leisure and community facilities. New development will be expected to enhance the public realm and physical environment. The five District Centres of Bruce Grove/Tottenham High Road, Crouch End, Muswell Hill, Green Lanes and West Green Road/Seven Sisters will accommodate new housing, retail, employment, culture health, recreation and community facilities. New development will be considered in the context of the character of the District Centres and should enhance the physical environment and public realm. Finally, Haringey's 38 local shopping centres will continue to provide appropriate levels of convenience retailing, community and social facilities and it is within this context that new development will be considered.

- 2.12 Two other policy options were put forward for SP1 Managing Growth:
- a. Seek to minimise and restrict economic and housing growth to Opportunity Areas of Haringey Heartlands and Tottenham Hale only.
 - b. Focus growth in areas of change and restrict economic and housing growth elsewhere in the Borough.
- 2.13 The three policy options were appraised and the preferred option was likely to result in the most positive effects against the SA framework compared to the two other options considered. This option performed particularly well against the social objectives (SA Objectives 4, 5 and 6). It will have positive impacts on the economic base as a result of regeneration programmes in areas of change and it will contribute to the vitality and vibrancy of the town centres.
- 2.14 Option a is less likely to contribute to economic objectives because it limits growth to two areas. Option b may result in uncoordinated growth since the areas would be competing with each other.
- 2.15 A comprehensive public consultation exercise was carried out on the New Plan. A number of meetings regarding the consultation responses and the further development of the Core Strategy took place with key consultees and internal officers. This included meetings with the Haringey Strategic Partnership themed boards, Haringey NHS, the Joint Strategic Needs Assessment (JSNA), the Corporate Policy network and internal officers from relevant services. Ongoing discussions and input from key stakeholders and internal services contributed to the development of the Proposed Submission document.
- 2.16 As mentioned above, the New Plan for Haringey contained 12 strategic policies which were deemed the most appropriate to take forward sustainable development in the borough. However, in order to address guidance in PPS12, and to produce a plan concentrating on devising a strategy to deal with issues of local importance a number of changes to policies were proposed and new policies produced for inclusion in the Proposed Submission Core Strategy.

- 2.17 This approach was also supported by the Government Office for London (GOL) and the Greater London Authority (GLA). One of the key changes proposed was to re-write SP1 in order to ensure that the Council's approach to managing growth fully took into account the spatial pattern of development in the borough as well as addressing the strategic objectives of the London Plan.
- 2.18 It was agreed that SP1 Managing Growth should address three approaches to development with areas of high, medium and low growth, properly reflecting the different characteristics of the borough.
- Areas of **high growth** are those identified as London Plan 'Growth Areas' - Opportunity Areas and Areas of Intensification (i.e Tottenham Hale and Haringey Heartlands). These are areas with the greatest capacity for growth. It is expected that the most significant amount of houses, jobs and infrastructure will be delivered in these areas over the plan period.
 - Areas of **medium growth** have been identified in the Core Strategy as 'Areas of Change'. These are areas with considerable potential for growth, though on a lesser scale than growth areas. These areas are appropriately located to support growth and contain identified sites which are available and suitable for development.
 - Areas of **low growth** have been identified in the Core Strategy as 'Areas of Limited Change'. These are areas in which expected growth is likely to be small and be of an incremental nature.
- 2.19 It was considered that this refined SP1 didn't deviate from the sustainability appraisal assessment of Options as it was still consistent with the preferred approach of Options A and B. It was more the case that this new approach would further clarify the results of the SA by having a strategic policy which demonstrated the different levels of growth that the borough would experience over the life of the Core Strategy (set out in paragraph 3.1.3 of the submitted Core Strategy).
- 2.20 Other changes included a new policy addressing the needs of Gypsies and Travellers, the Environment policy separated into three new policies dealing with Low Carbon, Water and Flooding, and Waste.
- 2.21 To align with the next stage of the Sustainability Appraisal process (**Stage B**), the revised SP1 and the other policy changes were appraised which informed the Proposed Submission Core Strategy. The SA findings demonstrated that the changes to the policies did not have a significant effect on the social, economic and environmental objectives of the sustainability framework.
- 2.22 The Proposed Submission Core Strategy and SA Report were published for final consultation in May/June 2010. A number of minor changes were proposed to the Core Strategy following this consultation and these were also subject to a final sustainability appraisal, prior to submission. Some of these changes included a revised SP12 Conservation to reflect new PPS5, changes to text on climate change and details relating to the location of tall buildings.

2.23 Furthermore, an additional Regulation 27 consultation was carried out in November/December 2010 to recognise policy changes to the affordable housing threshold and employment land designations. A SA Report was prepared to assess these policy changes, again showing no significant effects. A final SA report was prepared for Submission.

2.24 Changes to the Core Strategy following publication in May 2010 have been assessed against the SA Objectives in the subsequent SA Reports and the effects have not been considered significant. This applies to the minor changes and the changes relating to affordable housing and employment land.

3.0 Conclusion

3.1 It is clear from the above that the SA did inform the content of the Core Strategy at every stage of its development. The SA process is an iterative one and the Council is satisfied that the SA adequately summarises the reasons that were given for rejecting the alternatives at the time they were ruled out, and those reasons are still valid.

3.2 The Core Strategy makes clear spatial choices about where developments should go in broad terms and this is supported by the SA process. Finally, it is considered that these spatial choices do provide the most appropriate strategy for sustainable development within Haringey up to 2026.

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