



Haringey Council

Sustainability Appraisal (SA) of the Development Management Policies DPD

Interim SA Report

Published alongside the 'Preferred Option' consultation document

February 2015



Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Feb 2014	Interim SA Report published alongside a draft version of the Development Management Policies DPD	Anthony Whitaker, Assistant Planner Charlotte Simpson, Assistant Planner James Salmon, Graduate Planner	Mark Fessey, Principal Consultant	Steve Smith, Technical Director

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INTRODUCTION

1 BACKGROUND

- 1.1.1 URS is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Development Management (DM) Policies Development Plan Document (DPD). Once adopted, the DPD will set out the detailed DM policies for the Borough; building on the adopted Strategic Policies DPD.
- 1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including ‘equalities’ and ‘health’ issues¹), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs is a legal requirement.²

2 SA EXPLAINED

- 2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.³
- 2.1.2 In-line with the Regulations, a report (which we call **the SA Report**) must be published for consultation alongside the draft plan that ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’. The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 The Regulations prescribe the information that must be contained within the SA Report. Essentially, **the SA Report must answer the following four questions:**
1. What’s the scope of the SA?
 - The scope must be established subsequent to a review of the sustainability context and baseline, and consultation with designated agencies.
 2. What has Plan-making / SA involved up to this point?
 - Preparation of the draft plan must have been informed by at least one earlier plan-making / SA iteration at which point ‘reasonable alternatives’ are appraised.
 3. What are the SA findings at this stage?
 - i.e. in relation to the draft plan.
 4. What happens next (including monitoring)?

3 THIS INTERIM SA REPORT

- 3.1.1 At the current stage of plan-making the Council is not consulting on a complete draft plan. Rather, the Council is consulting on ‘preferred option’ document. This Interim SA Report is produced with the intention of informing the consultation and subsequent preparation of the draft (‘proposed submission’) version of the plan.

Structure of this Interim SA Report

- 3.1.2 Despite this being an ‘Interim’ SA Report (i.e. a document that does not need to provide the information legally required of the SA Report) it is nonetheless helpful to structure this report according to the four questions listed above.

¹ As part of this SA process, explicit consideration is being given to ‘equalities’ and ‘health’ issues, and as such this SA process can be said to be integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). More on the SA scope – i.e. the scope of issues that are a focus of SA – is explained in ‘Part 1’ of this Report.

² Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that Local Planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (2012).

³ Directive 2001/42/EC

PART 1: WHAT'S THE SCOPE OF THE SA?

4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the ‘scope’ of the SA. In particular, and as required by the Regulations⁴, this Part of the SA Report answers the following questions.

- What’s the Plan seeking to achieve?
- What’s the sustainability ‘context’?
- What’s the sustainability ‘baseline’?
- What are the key issues and objectives that should be a focus of SA?

4.1.2 **Chapter 5** answers the first question.

4.1.3 The other three scoping questions are answered in **Chapters 6 - 8**, with each question answered for the following 21 broad sustainability topics:

	Broad sustainability topics	
Social	<ul style="list-style-type: none"> • Crime • Education • Health 	<ul style="list-style-type: none"> • Housing • Community Cohesion • Accessibility
Economic	<ul style="list-style-type: none"> • Economic Growth • Skills and Training 	<ul style="list-style-type: none"> • Economic Inclusion • Town Centres
Environmental	<ul style="list-style-type: none"> • Biodiversity • Townscape and Cultural Heritage • Open Space • Water Resources • Soil and Land Quality • Flood Risk and Climate Change 	<ul style="list-style-type: none"> • Air Quality • Noise • Energy and Carbon • Waste Management • Sustainable Transport

4.2 Consultation on the scope

4.2.1 The Regulations require that: *“When deciding on the scope and level of detail of the information that must be included in the [SA] Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans”*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁵

4.2.2 As such, an SA Scoping Report was published for consultation in 2012.⁶ In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council’s consultation database. Subsequent to consultation the SA scope was updated.

⁴ Environmental Assessment of Plans and Programmes Regulations 2004

⁵ In-line with Article 6(3).of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities,[they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

⁶ The SA Scoping Report can be viewed online: <http://www.haringey.gov.uk/housing-and-planning/planning-policy/local-development-framework-ldf/development-management-development-plan-document>

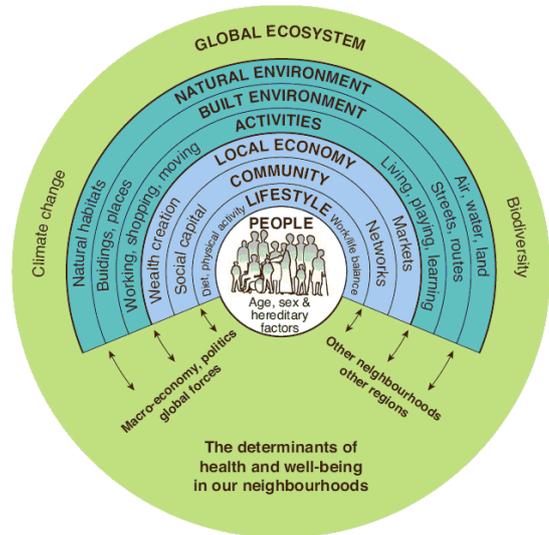
4.3 A note on ‘equalities’ and ‘health’ considerations

4.3.1 Equality and health considerations (‘issues’) were a focus of SA scoping work. As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence the SA process ‘integrates’ Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA).

Box 4.1: EqIA and HIA

The Council is not required to undertake **EqIA**, but does have a duty to give "due regard" to promoting equality of opportunity for all protected groups when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected groups’ are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

With regards to **HIA**, this are no requirements on the Council, although the NPPF requires planners to promote healthy communities and use evidence to assess health and wellbeing needs; and additionally, the GLA and the Mayor are required to ‘have regard to health’ in preparing strategies at the London-scale. It is important to understand that HIA is to a large extent about giving consideration to the wider *determinants of health*, including those related to the quality of the natural and built environment, people’s daily activities and lifestyles, and local communities and the economy.



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

5 WHAT IS THE PLAN SEEKING TO ACHIEVE?

The SA Report must include...

- An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes

5.1.1 The DM Policies DPD, once adopted will set out the detailed development management policies for the Borough; building on the adopted Strategic Policies DPD. The DM Policies DPD will be used to guide and shape the development that comes forward in the Borough and will provide the decision-making framework that planning applications will be assessed against.

5.1.2 The objectives of the DM Policies DPD are to:

- Direct development to appropriate locations and ensure a balance between land uses and in the case of housing, the types of accommodation that should be provided.
- Set out design requirements and environmental sustainability standards.
- Address the need to mitigate any impacts of development on valuable infrastructure and identify the circumstances in which applicants will be required to provide additional infrastructure. This includes social community facilities such as schools; public realm improvements; energy and utilities infrastructure; open space and a range of other types of infrastructure.

5.1.3 The principal influences on plan preparation are the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must adhere to; the Haringey Strategic Policies (2013); and London Plan (2011), along with Draft Further Alterations to the London Plan (FALP) (2014). The plan is also being developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011.

5.2 What's the plan not seeking to achieve?

5.2.1 The plan is not seeking to set an overarching spatial strategy for the Borough as this is set out in the Strategic Policies DPD (2013) and London Plan. The plan instead seeks to build on the strategic policies and add greater detail to guide, shape and inform decision-making for development proposals that will come forward during the plan period.

5.2.2 At the same time, the plan will be strategic in nature in that it will omit consideration of some detailed issues in the knowledge that these can be addressed further down the line, i.e. at the planning application stage.

6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?

The SA Report must include...

- The relevant sustainability objectives, established at international / national level; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

6.1 Introduction

6.1.1 This chapter introduces key sustainability context messages in relation to broad problems/issues and objectives. The source of context messages includes:

- The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (NPPG), which constitutes the Government's view of what sustainable development in England means in practice for the planning system;
- Other Government reports; and
- Reports prepared by other (e.g. third sector) organisations.

6.1.2 Presented below is an updated summary of the context review presented in the Scoping Report (2012).

6.2 Social

Crime

- The NPPF calls on planning authorities to ensure that developments create safe environments where crime and disorder, and the fear of crime, do not undermine quality of life. It notes that measures to design out crime should be integral.
- The 'Haringey Community Safety Strategy 2013-2017' notes that following the riots in 2011, it was recommended that the Borough strengthen efforts to seek investment in economic growth, jobs, high quality housing and improved engagement with the communities affected.

Education

- The NPPF notes that providing a 'sufficient choice of school places is of 'great importance' and there is a need on the part of planning authorities to take a 'proactive, positive and collaborative approach' towards achieving this.
- According to the London Plan, the Mayor will support the provision of education facilities in order to meet the demand generated by London's growth.

Health

- The NPPF calls for the setting strategic policies to ensure the provision of health facilities. In terms of the wider determinants of health, it notes that access to high quality open spaces and sport and recreation can make an important contribution.
- The 'Marmot Review' concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked'. The 'Haringey Health and Wellbeing Strategy 2012-2015' endorses the findings of the Marmot review in terms of the need to 'ensure social justice, health and sustainability are at the heart of all policies'.
- The report 'Ready for Ageing?' warns that society is underprepared for the ageing population. Meanwhile, the study 'Under the Weather' finds that heat related illness is liable to increase under climate change, but that this could be addressed through appropriate urban planning.

- At a local level, Haringey Council recently published for consultation a draft Corporate Plan, 'Building a Stronger Haringey Together'. One of the draft priorities is: "Empower all adults to live healthy, long and fulfilling lives."

Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible, including where housing market areas cross administrative boundaries. The NPPF also notes that:
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - Good design is a key aspect in sustainable development.
 - Authorities should ensure provision of affordable housing
 - Larger developments are sometimes the best means of achieving new homes.
- Each of London's Boroughs are required to fulfil the housing targets as set out in the London Plan, and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality.
- 'Haringey's Housing Strategy 2009-19' sets out Haringey's approach to housing over the next ten years. It includes a vision to create 'neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations'. In October 2014, the Council published for public consultation a new Housing Strategy 2015-2020.

Community cohesion

- The NPPF states that a planning principle is to support strategies to improve health, social and cultural wellbeing for all. There is a need to facilitate social interaction and promote the retention and development of community services and facilities.
- The report Natural Solutions notes that green spaces potentially have a role to play in increasing community cohesion by providing a neutral space for meeting and interacting.
- In the Haringey 'Sustainable Community Strategy 2007-2016' an ambition is set out to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.

Accessibility

- The NPPF notes that the planning system has a role to play in providing accessible local services that reflect community needs and support health, social and cultural well-being.
- The London Plan states that development should provide and improve access to social and community infrastructure. Inclusive design should also be adopted to take into account the needs of older and disabled people.
- The Haringey 'Sustainable Community Strategy 2007-2016' looks to ensure that the Borough's communities have easier access to open spaces, facilities and shopping areas.

6.3 Economic

Economic growth

- The European Union strategy for achieving economic growth up until 2020 focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth.
- According to the NPPF, the planning system can contribute to a responsive economy by ensuring sufficient land of the right type is available in the right places and at the right time; and by identifying and coordinating development requirements. It emphasises the need to:
 - Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'.
 - Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'.
- The Mayor's Economic Development Strategy sets an ambition for London to be the world capital of business, and to have the most competitive business environment in the world.
- The Haringey Regeneration Strategy sets out a key priority to develop a 21st century business economy that offers opportunities for sustainable employment and enterprise, to help make Haringey a place people want to work, visit and invest in.

Skills and training

- The Haringey 'Sustainable Community Strategy 2007-2016' sets an objective to extend training opportunities for people to improve their skills, especially in order to have access to jobs in key areas of commerce and growth.
- The Haringey Regeneration Strategy sets out a key priority to unlock the potential of Haringey residents through increasing skill levels and raising employment so that they can contribute to and benefit from being part of one of the most successful cities in the world.

Economic inclusion

- The London Plan notes that there is a need to tackle persistent poverty and deprivation through a policy framework that helps tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need.
- The Local Growth White Paper notes that growth should be broad-based industrially and geographically, ensuring everyone has access to the opportunities that growth brings.
- The Haringey 'Sustainable Community Strategy 2007-2016' sets an ambition to target poverty through targeted social inclusion initiatives.

Town centres

- The NPPF emphasises the need to support competitive town centres, and oppose schemes that will impact town centre viability. It calls for town centres to provide a diverse retail offer and to reflect local 'individuality'.
- CLG's (2012) report 'High streets at the heart of our communities' notes that local policies should look to reinforce local distinctiveness and community value of town centres, and develop their social function with a view to underpinning ongoing commercial viability.
- The London Plan calls for the scale of new retail, commercial, culture and leisure developments within town centres to reflect the size, role and function of that centre.

6.4 Environmental

Biodiversity

- The NPPF emphasises the need to protect important sites, plan for green infrastructure and plan for ecological networks whilst taking account the anticipated effects of climate change. National policy reflects the EU Biodiversity Strategy's commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.
- The Natural Environment White Paper sets out the importance of a healthy, functioning natural environment to sustained economic growth, prospering communities and well-being. It signals a move towards protecting biodiversity throughout the landscape.
- The London Plan states calls for priority to be given to achieving Biodiversity Action Plans (BAP) targets and supporting sites within or near to areas deficient in accessible wildlife sites. The Haringey BAP notes that there is a need to consider biodiversity as a cross cutting agenda to be integrated into the delivery of all services.

Townscape and cultural heritage

- The NPPF calls for a 'positive strategy' towards the 'conservation and enjoyment of the historic environment', including assets most at risk. Heritage assets should be recognised as an 'irreplaceable resource' to be conserved in a 'manner appropriate to their significance'.
- The London Plan calls for Local Authorities to maintain and enhance the contribution of the cities 'built, landscaped and buried heritage' to London's environment, culture, and economy.
- English Heritage's 'Heritage at Risk National Strategy' targets the removal of a quarter of nationally designated heritage at risk assets by April 2015. Meanwhile, 'Seeing history in the view' provides a means of understanding views that are recognised as important.

Open space

- The NPPF recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.
- The London Plan states that boroughs should plan for green infrastructure needs to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.
- Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments.

Water resources

- The EU Water Framework Directive drives a catchment-based approach to water management. An Environment Agency strategy implements Directive in relation to groundwater, highlighting that groundwater is at risk from point source and diffuse pollution.
- The NPPF calls for planning authorities to produce strategic policies to deliver the infrastructure necessary for water supply and wastewater and to take account of the effects of climate change in the long term, including on water supply.

- The 'Water White Paper' notes that through measures to encourage and incentivise water efficiency (and demand management measures by water companies), the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- An Environment Agency strategy for restoring rivers in North London considers how rivers play a role in urban regeneration, providing a range of social and environmental benefits.

Soil and land quality

- The NPPF recognises the need to protect and enhance soils; prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil pollution or land instability; and remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.
- The NPPF also highlights the need to encourage the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value.
- The 'Safeguarding our Soils' strategy highlights the vital role soils play in supporting ecosystems, facilitating drainage and providing urban green spaces for communities.

Flood risk and climate change

- The EU's 'Blueprint to Safeguard Europe's Water Resources' promotes the use of green infrastructure, such as wetlands, floodplains and buffer strips along water courses in order to reduce vulnerability to floods and droughts.
- The NPPF notes that development should be directed away from areas at highest risk from flooding. Where development is necessary, it should be made safe without increasing risk elsewhere. New developments should be planned to avoid vulnerability to climate change.
- The 'Flood and Water Management Act' calls for the incorporation of greater resilience measures into new buildings, retro-fitting at risk properties, and utilising the environment to address risk (e.g. harnessing wetlands to store water). 'Planning for SuDS' calls for greater recognition of the multiple benefits this form of water management can provide.

Air quality

- The EU Thematic Strategy on Air Pollution aims to cut the annual number of premature deaths from air pollution-related diseases by 40% by 2020 (using 2000 as the base year).
- According to the NPPF, plans should contribute towards national objectives for pollutants, taking into account the presence of Air Quality Management Areas. New and existing developments should be prevented from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of air pollution.
- The Mayor's Air Quality Strategy notes that air pollution harms the environment and health, with greater impacts felt most severely by vulnerable people, such as children and the elderly. The London Plan seeks to ensure that development is at least 'air quality neutral'.

Noise

- The NPPF states that planning policies should aim to avoid noise that gives rise to significant adverse impacts on health and quality of life.
- The Mayor's Ambient Noise Strategy focuses on reducing noise through better management of transport systems, better town planning, and better design of buildings.

Energy and carbon

- On energy, the European Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008⁷. Plan-making should, for example, support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment
- The London Plan seeks to reduce London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. Haringey Council has set an ambitious target to reduce borough-wide carbon emissions by 40% by 2020 from a 2005 baseline.

Waste management

- The Mayor's municipal waste management strategy aims provide Londoners with the knowledge, infrastructure and incentives to change the way they manage municipal waste, including minimising its impact on the environment and unlocking its economic value.
- The seven north London boroughs are preparing a joint Waste Plan. This plan will identify a range of suitable sites for waste management uses, to meet London Plan waste apportionments, and include policies and guidelines for determining planning applications.

Sustainable transport

- The NPPF states that the transport system needs to be balanced in favour of sustainable transport modes (including walking, cycling and public transport). To minimise journey lengths planning policies should aim for 'a balance of land uses', and where practical, key facilities should be located within walking distance or be well served by public transport.
- Haringey encourages 'sustainable' forms of transport through measures including the Haringey Walking Plan, Cycling Action Plan and Haringey Cycle Route Network.

⁷ In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.

7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The SA Report must include...

- The relevant aspects of the current state of the sustainability baseline and the likely evolution thereof without implementation of the plan';
- The characteristics of areas / populations etc. likely to be significantly affected; and
- Any existing sustainability problems / issues which are relevant to the plan including, in particular, those relating to any areas / populations etc. of particular importance.

7.1 Introduction

7.1.1 The baseline review is about expanding on the consideration of problems/issues identified through context review so that they are locally specific. Once the baseline has been established it can be used as a 'benchmark' against which to assess effects.

7.1.2 Presented below is an updated summary of the baseline review presented in the Scoping Report (2012).

7.2 Social

Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the Borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is not particularly high, but there are localised issues. In Tottenham Hale 22.45% of residents aged 16 and over have no qualifications.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.

Health

- Health and well-being in Haringey is very similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further.
- Health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the Borough. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.

- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese.

Housing

- Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The Borough has notable levels of homelessness, with 3000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the Borough (which is more densely populated than the west).
- At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London.
- The 2011 Census shows that the Borough; population was recorded as 254,926. This presents a significant change from the 2001 Census. The Borough has population density of 86.2 persons per hectare; well above the London average (52.0). The Borough's population is set to increase by 31,234 over the period 2011-2021.

Community Cohesion

- The 2011 Census showed that Haringey's population increased by 38,390 from 216,510 in 2001 to 254,900 in March 2011 (an 18% increase).
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. Nearly half the population comes from ethnic minority backgrounds.
- The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey.
- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 13th most deprived local authority in England. There are particular pockets of deprivation such as in Tottenham Northumberland Park, Wood Green and Hornsey. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England.

Accessibility

- Education is highly accessible, with 100% of 5 to 10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and 100% of 16-19 year olds within 30 minutes of further education.

7.3 Economic

Economic growth

- When compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. The level of employment declined by 7.1% between 2008-10, almost double the London and national averages.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 or less people. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. Business stakeholders have expressed concern about the range of business premises available in the borough.

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles⁸ (55.4%) across Haringey were higher than the London average (54.6) and significantly above the percentage for Great Britain of 44.5%. The percentage of the Borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The Borough is characterised by its polarised skills base. Around 21% of the Borough's working age population has a level 1 or below qualification. Meanwhile, 40% have a level 4 or above qualification.

Economic inclusion

- The total number of economically active in 2011 was 65.5% with 6.1% unemployed. This compares reasonably favourably with London, where 66.5% were economically active in 2011, with 8.4% unemployed.
- Tottenham has some of the highest levels of unemployment in London and the UK. In 2011, 63.7% of people aged 16-64 in Tottenham were in employment, below both the London and England rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64). This is significantly above the England and London rates.

Town centres

- Haringey has a range of town centres providing shopping and services and local employment. The Wood Green Metropolitan Town Centre is the highest ranking shopping centre in the Borough with 106,000 square metres of floorspace.
- It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the Borough to fulfil their role and function
- Haringey's town centre vacancy rates have increased in recent years but overall, they remain lower than national and regional averages. However, the borough's town centres are not performing equally in this respect.
- Crouch End and Green Lanes have the highest percentages of vacant town centre floor space, with 8.7% and 6.9% respectively. Wood Green (3.3%) is the best performing.

⁸ Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

7.4 Environmental

Biodiversity

- Three European Sites are within a 10 km radius of Haringey – Lee Valley Ramsar Site, Lee Valley Special Protection Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- The Borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance. Of these, five are of Metropolitan Importance, 22 of Borough Importance Grade I and Borough Grade II and 33 of Local Importance. Haringey also has five Local Nature Reserves (LNRs) - Alexandra Palace & Park, Coldfall Wood, Parkland Walk, Railway Fields and Queens Wood. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced.
- The Lee Valley Regional Park straddles the eastern boundary of the Borough. This area is home to European designated sites and is a Site of Special Scientific Interest.
- Natural England suggests a ratio of 1 hectare of Local Nature Reserve for every 1000 of population. Haringey currently has 0.6 hectares per 1000 residents.

Townscape and cultural heritage

- The Boroughs historic assets include 467 listed buildings of Special Architectural or Historic Interest, six Grade I buildings and 434 Grade II buildings, 1150 locally listed Buildings of Merit, 29 Conservation Areas (some of which have had Character Appraisals⁹ completed), two Registered Parks and Gardens (Finsbury Park and Alexandra Park), 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. Also, the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Viewing Corridor.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.

Open space

- The Lee Valley presents a significant recreational waterway, which could serve to link Haringey with developments in East London most notably the Olympic Park. The Lee Valley Regional Park is Haringey's single area of designated Green Belt and should continue to be protected. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land, and the All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- There is a need to improve accessibility to and quality of open spaces; explore opportunities for accessible open spaces within new development and the opportunities to link open spaces; and improve smaller open spaces and green areas.
- The Borough has an overall provision of 1.7 ha of open space per 1,000 of population. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward.

Water resources

- Haringey is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment.

⁹ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

- The Moselle Brook and Stonebridge Brook is heavily modified. These Brooks are both tributaries of the Lower Lee River, classified as having 'poor' ecological status and failing to meet 'good ecological potential' under the Water Framework Directive.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area. Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- The Borough is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.
- The GLA¹⁰ estimate that buildings cover 24,000 hectares or 16% of Greater London. Crude calculations of the potential for green roofs in four areas of central London suggest that out of a surface area of 10 million m², 3.2 million m² had the potential to be greened. This would have a capacity to store in the region of 80,000m³ of rainwater at roof level, the equivalent to, approximately, the volume of water needed for 35 Olympic swimming pools.
- Haringey-specific data is not available for water consumption however at the London level¹¹ the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

Soil and land quality

- A variety of industrial land uses have left behind substantial contamination in the borough, which may need to be remediated before development. The Borough's Contaminated Land Strategy identified potentially contaminated sites in the borough.
- Brownfield sites should be prioritised and sites which offer the greatest capacity for development. Previously developed land (PDL) within Haringey accounts for approximately for 3% of London's total PDL area.
- The Greater London Authority had identified 29 PDL sites in Haringey, which cover 84.9ha of land. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL. In 2011/12, 100% of housing was built on PDL.

Flood risk and climate change

- According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced. There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences would be significant.
- Climate change effects increase the severity and frequency of the flood risk. The extent and frequency of surface water flooding would be increased across the borough. The standard of protection from river flooding is also reduced by climate change effects in some parts of the borough adjacent to the River Lea.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the Borough. Tottenham Hale is the most vulnerable ward, with more than 50% lying within Flood Zone 2.

¹⁰ GLA (2008) Living Roofs and Walls Technical Report: Supporting London Plan Policy [online] available at: <http://www.london.gov.uk/sites/default/files/living-roofs.pdf> (accessed 10/14)

¹¹ Environment Agency (2013) State of the Environment Report for London [online] available at: <http://data.london.gov.uk/documents/SOE-2011-report.pdf> (accessed 10/14)

Air quality

- The Borough suffers poor air quality primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park.
- There are no sites listed as producing emissions to air, although the Edmonton Solid Waste Incinerator is located just beyond the Borough's northeast boundary.

Noise

- There is no suitable baseline data available for this SA topic, however anecdotally concentrations of noise exist along transport corridors in the Borough.

Energy and carbon

- The Borough has adopted a target of reducing its CO₂ emissions by 40% in line with the London Plan energy hierarchy. The population of Haringey is expected to increase during the plan period to 2050. If this growth occurs emissions are expected to increase.
- Haringey Annual Carbon Report explains the current situation in relation to a range of energy/carbon issues. A headline message is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%. This is consistent with London wide and national trends; London wide emissions have increased by 8% and UK emissions by 5.3%.
- It is also noted that in 2013 Haringey Council led a successful application to the Department of Energy and Climate Change for 'Green Deal Communities' funding, to deliver a programme that will reduce energy costs for households and businesses in Haringey, encourage eco-retrofit and drive sustainable economic growth.

Waste management

- The total amount of Municipal Solid Waste collected by Haringey in 2011 was 115,793 tonnes. 29% of the total was sent to landfill or 33,578 tonnes. Haringey has an overall capacity for waste management of approximately 104,800 tonnes per annum.
- The Borough achieves good recycling rates. There are two Reuse & Recycling Centres and these accept an increasing range of materials and items for reuse or recycling. Other waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the Borough. The overall recycling and composting rate for the North London Waste Authority, including Haringey is 24%.

Sustainable transport

- Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes. Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider Borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital. Stronger orbital public transport capacity is required to serve key development areas and town centres. There is also a need for improved connectivity to key employment areas outside of the borough including Stratford, Brent Cross and Stansted Airport.
- Over half of Haringey households do not own a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car.

8 WHAT ARE THE KEY ISSUES AND OBJECTIVES THAT SHOULD BE A FOCUS?

The SA Report must include...

- Key problems / issues and objectives that should be a focus of / provide a framework for appraisal.

8.1.1 Drawing on the review of the sustainability context and baseline, it is possible to identify a list of key sustainability objectives that should be a focus of SA. These objectives (and the associated criteria) provide a methodological 'framework' for SA, i.e. can be used to guide the appraisal of significant effects on the baseline.

Table 8.1: The SA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Social		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> • Encourage safety by design? • Reduce levels of crime? • Reduce the fear of crime? • Reduce levels of antisocial behaviour?
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education for all members of society? • Improve the provision of and access to education and training facilities? • Ensure educational facilities are accessible to residential areas? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> • Improve access to health and social care services? • Prolong life expectancy and improve well-being? • Promote a network of quality, accessible open spaces? • Promote healthy lifestyles? • Provide good quality outdoor sports facilities and sites?
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> • Reduce homelessness? • Increase the availability of affordable housing? • Improve the condition of Local Authority housing stock? • Improve the diversity of the housing stock? • Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character? • Create balanced communities of different affordable housing types, densities and tenures? • Create integrated, mixed-use tenure developments?
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> • Promote a sense of cultural identity, belonging and well-being? • Develop opportunities for community involvement? • Support strong relationships between people from different backgrounds and communities?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> • Improve access to cultural and leisure facilities? • Maintain and improve access to essential services (banking, health, education) facilities?
Economic		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> • Retain existing local employment and create local employment opportunities? • Diversify employment opportunities? • Meet the needs of different sectors of the economy? • To facilitate new land and business development?
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> • Improve lifelong learning opportunities and work related training? • Reduce high levels of unemployment and worklessness? • Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> • Improve physical accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> • Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity at designated and non-designated sites? • Link and enhance habitats and wildlife corridors? • Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> • Promote townscape character and quality? • Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> • Promote a network of quality, accessible open spaces? • Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> • Preserve ground and surface water quality? • Conserve water resources? • Incorporate measures to reduce water consumption?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> • Encourage the development and remediation of brownfield land? • Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> • Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> • Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> • Minimise the impact of the ambient noise environment?
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> • Minimise the use of energy? • Increase energy efficiency and support affordable warmth initiatives? • Increase the use of renewable energy? • Mitigate against the urban heat island effect? • Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> • Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? • Encourage the re-use of goods? • Reduce the production of waste? • Support the use of sustainable materials and construction methods? • Increase the proportion of waste recycling and composting across all sectors?
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> • Improve the amenity and connectivity of walking and cycling routes? • Promote the use of public transport? • Reduce the use of the private car? • Encourage development in growth areas and town centres and reduce commuting?

PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

9 INTRODUCTION (TO PART 2)

The SA Report must include...

- An outline of the reasons for selecting the alternatives dealt with; and
- The likely significant effects on the environment associated with alternatives / an outline of the reasons for selecting the preferred approach in-light of alternatives appraisal (and hence, by proxy, a description of how environmental objectives and considerations are reflected in the draft plan).

9.1.1 The 'story' of plan-making / SA up to this point is told within this part of the SA Report. Specifically, this part of the report explains how preparation of the current version of the DM Policies DPD has been informed by appraisal of **alternatives** for the following policy areas / topics:

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

Reasons for focusing on these policy areas

9.1.2 These are all topics that offer opportunities to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Haringey's spatial strategy. Systematic appraisal of (and consultation on) reasonable alternatives equates to proactive plan-making, and is a means of ensuring that the final policy approach is sufficiently justified.

9.1.3 Other policy topics besides those listed above could have been the focus of alternatives appraisal, but were not on the basis that it was unclear what value would be added. For many topics it is proportionate to develop a preferred policy approach on the basis of technical work and consultation, without formal alternatives appraisal. It is important to remember that in many instances DM Policy will closely reflect the policy direction set out by the Strategic Policies DPD (which was developed alongside a process of Sustainability Appraisal).¹²

¹² N.B. The Council remains open to suggestions regarding what should reasonably be the focus of alternatives appraisal. There is the potential to undertake further alternatives appraisal subsequent to the current consultation, i.e. when preparing the proposed submission version of the plan.

Structure of this part of the SA Report

- 9.1.4 Each of the 13 policy areas listed above is assigned a chapter, below. Within each chapter, the following questions are answered:
- What are the reasons for selecting the alternatives dealt with?
 - What are the appraisal findings (in relation to the set of alternatives in question)?
 - What are the Council's reasons for selecting the preferred approach in-light of alternatives appraisal findings?
- 9.1.5 These questions reflect the regulatory requirement for the SA Report to present 1) appraisal findings for 'reasonable alternatives' and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

10 HOUSING CONVERSIONS

10.1 Introduction

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

10.2 Reasons for selecting the alternatives dealt with

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

10.2.2 The following alternatives have been appraised:

Option 1 - Restricted conversion area to preserve larger and family homes

Option 2 - Do not introduce restricted conversion areas.

10.3 Summary appraisal findings

10.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix I**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference.

Table 10.1: Summary appraisal findings: Housing Conversions

Topic	Option 1 - Restricted conversion area to preserve larger and family homes	Option 2 - Do not introduce restricted conversion areas
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	★ 1	2
Community Cohesion	★ 1	2
Accessibility	N/a	N/a
Economic Growth	N/a	N/a
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a
Town Centres	N/a	N/a
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a

Topic	Option 1 - Restricted conversion area to preserve larger and family homes	Option 2 - Do not introduce restricted conversion areas
Soil and Land Quality	2	★1
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	2	★1
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a

Summary

A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant.

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

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

11 HOUSING DENSITY AND DESIGN

11.1 Introduction

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

11.2 Reasons for selecting the alternatives dealt with

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

11.2.2 The following alternatives have been appraised:

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

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

11.3 Summary appraisal findings

11.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix II**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also **rank** the alternatives in order of preference.

Table 11.1: Summary appraisal findings: Housing Density and Design

Topic	Option 1 - Apply London Plan density standards, with exceptions in some circumstances	Option 2 - London Plan standards always applied - No higher density exceptions
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	★ 1	2
Community Cohesion	★ 1	2
Accessibility	N/a	N/a
Economic Growth	★ 1	2
Skills and Training	N/a	N/a
Economic Inclusion	★ 1	2

Topic	Option 1 - Apply London Plan density standards, with exceptions in some circumstances	Option 2 - London Plan standards always applied - No higher density exceptions
Town Centres	N/a	N/a
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality		2
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon		2
Waste Management	N/a	N/a
Sustainable Transport		2

Summary

The Borough is densely populated (86.2 persons per hectare; well above the London average of 52) and the population is set to increase by 31,234 over the period of 2011 to 2021. This indicates that some high density housing schemes are needed, perhaps going beyond what is recommended in the London Plan. Against this background, Option 1 is seen to perform well in terms of sustainability objectives. As well as benefits in terms housing objectives, targeted high density development in Haringey is supported in terms of 'sustainable transport', 'reducing per capita carbon emissions' and 'increasing accessibility to local jobs'. However, there are risks around access to health care and community infrastructure more generally.

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

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

12 EMPLOYMENT SITES (1)

12.1 Introduction

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

12.2 Reasons for selecting the alternatives dealt with

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

12.2.2 The following alternatives have been appraised:

Option 1 - Requirement to maximise employment densities on sites

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

12.3 Summary appraisal findings

12.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix III**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 12.1: Summary appraisal findings: Employment sites (1)

Topic	Option 1 - Requirement to maximise employment densities on sites	Option 2 - Less restrictive approach, with no specific steer for higher employment densities
Crime	★ 1	2
Education	N/a	N/a
Health	N/a	N/a
Housing	N/a	N/a
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	★ 1	2
Skills and Training	N/a	N/a
Economic Inclusion	★ 1	2
Town Centres	N/a	N/a

Topic	Option 1 - Requirement to maximise employment densities on sites	Option 2 - Less restrictive approach, with no specific steer for higher employment densities
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	★ 1	2
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	★ 1	2
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a
<p><u>Summary</u></p> <p>In an area that is constrained in terms of the availability of land for employment development and has high unemployment levels, intensifying the existing offer is an important priority to create more jobs for the growing population and to address historic local unemployment. Against this background, Option 1 is seen to perform well in terms of sustainability objectives, with significant positive effects predicted in terms of economic growth and economic inclusion. A risk is that if/when space for large floorspace uses is needed, there will not be the land available to accommodate these uses, but this is considered to be minor given the evidence suggesting economic growth locally is considered most likely to come from B1 development.</p>		

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

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

13 EMPLOYMENT SITES (2)

13.1 Introduction

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

13.2 Reasons for selecting the alternatives dealt with

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

13.2.2 The following alternatives have been appraised:

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

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

13.3 Summary appraisal findings

13.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix IV**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of ‘significant effects’ (using **red / green** shading) where necessary and also rank the alternatives in order of preference.

Table 13.1: Summary appraisal findings: Employment sites (2)

Topic	Option 1 - Non-employment development to cross subsidise employment development	Option 2 – No requirement to cross subsidise
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	N/a	N/a
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	★ 1	2
Skills and Training	N/a	N/a
Economic Inclusion	★ 1	2

Topic	Option 1 - Non-employment development to cross subsidise employment development	Option 2 – No requirement to cross subsidise
Town Centres	N/a	N/a
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a
<p><u>Summary</u></p> <p>Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.</p>		

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

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

14 TOWN CENTRE USES

14.1 Introduction

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

14.2 Reasons for selecting the alternatives dealt with

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

14.2.2 The following alternatives have been appraised:

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

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

14.3 Summary appraisal findings

14.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix V**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of ‘significant effects’ (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 14.1: Summary appraisal findings: Town centre uses

Topic	Option 1 - Set thresholds for percentage of A1 uses in primary and secondary frontages	Option 2 - No thresholds or different (higher/lower) thresholds for A1 uses
Crime	★ 1	★ 1
Education	N/a	N/a
Health	N/a	N/a
Housing	N/a	N/a
Community Cohesion	★ 1	★ 1
Accessibility	N/a	N/a
Economic Growth	★ 1	★ 1
Skills and Training	N/a	N/a
Economic Inclusion	★ 1	★ 1

Topic	Option 1 - Set thresholds for percentage of A1 uses in primary and secondary frontages	Option 2 - No thresholds or different (higher/lower) thresholds for A1 uses
Town Centres	★ 1	★ 1
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a

Summary

The town centres in Haringey act as the focus for local convenience shopping and community facilities. Given this role, they will contribute to the vitality local communities, and also help to reduce car dependency. Protecting retail in town centres (Option 1) could help to sustain strong and vital centres in the long term; but on the other hand there are arguments to suggest that setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2). If there is greater demand for non-A1 uses than some existing A-class uses, then a restrictive policy would act to constrain the vitality of town centres, with knock-on effects. It is difficult to distinguish between the alternatives, given the changing role of town centres in society. However, it is noted that Haringey has commissioned an evidence base study which in essence says that, given the increasing population in Haringey and the likely increase in disposable income, it is likely that more retailing will be needed in the borough.

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

14.4.1 The preferred approach is to introduce a threshold requirement for A1 uses (Option 1). This has been selected in order to ensure that centres retain an element of retail uses, to help ensure their vitality and vibrancy, recognising the need to expand town functions with complementary uses, i.e. recognising current economic realities and changing role of centres. The preferred policy approach has been nuanced in light of the SA in order to permit other uses, and introduce a type of sequential test which identifies a hierarchy of appropriate uses for town centres.

15 NEGATIVE CLUSTERS: HOT FOOD TAKEAWAYS / BETTING SHOPS

15.1 Introduction

15.1.1 Both the London Plan and Strategic Policies DPD set out objectives to address human health and social deprivation. In Haringey, evidence has suggested a correlation between obesity and deprivation, as well as the location of betting shops and deprivation. Nationally there is also evidence suggesting a link between fast food and obesity. The concentration of any service, where not serving a wider specialist niche market, can have a detrimental effect on the town centres and communities, constraining the land and space available for other services. The role of town centres is critical to the borough, in providing a location for jobs, services and community activities. There is therefore the opportunity to set more detailed planning policies to deliver these objectives.

15.2 Reasons for selecting the alternatives dealt with

15.2.1 The location of betting shops and fast food outlets is, to a degree, already controlled by planning policy. There is an opportunity to explore the impacts of refining the baseline policy position by testing an alternative option, which considers more proactive and stringent controls on the management of the placement of fast food and betting shops.

15.2.2 The following alternatives have been appraised:

Option 1 - Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)

Option 2 - No policy - applications assessed against other town centre use policies.

15.3 Summary appraisal findings

15.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VI**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using red / green shading) where necessary and also rank the alternatives in order of preference.

Table 15.1: Summary appraisal findings: hot food takeaways / betting shops

Topic	Option 1 - Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)	Option 2 - No policy - applications assessed against other town centre use policies
Crime	★1	2
Education	N/a	N/a
Health	★1	2
Housing	N/a	N/a
Community Cohesion	★1	2
Accessibility	N/a	N/a
Economic Growth	N/a	N/a
Skills and Training	N/a	N/a
Economic Inclusion	★1	2

Topic	Option 1 - Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)	Option 2 - No policy - applications assessed against other town centre use policies
Town Centres		2
Biodiversity	N/a	N/a
Townscape and Cultural Heritage		2
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a
<p>Summary</p> <p>Overall, in terms of sustainability objectives, Option 1 is clearly best performing. No draw-backs are highlighted by the appraisal. Restricting negative clusters of hot food takeaways and betting shops would likely lead to significant positive benefits in terms of 'health', given the assumption that there would be reduced consumption of fatty foods. There would also be benefits in terms of reduced crime and antisocial behaviour, improved townscape and improved vitality in town centres.</p>		

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

- 15.4.1 The preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.

16 TALL BUILDINGS

16.1 Introduction

16.1.1 Tall buildings can contribute to wider strategic objectives for regeneration and economic development, for example, by helping to maximise the use of land, including for new housing. However, tall buildings can have a significant impact on the character and function local areas and are therefore not appropriate in all locations. The London Plan requires boroughs to identify suitable locations for tall buildings, and to identify these in Development Plan Documents. Haringey's Strategic Policies DPD includes relevant design criteria for tall buildings, however there is an opportunity to set more detailed policies in this regard.

16.2 Reasons for selecting the alternatives dealt with

16.2.1 One approach is to develop a detailed policy for the siting and design of tall buildings, taking account of site specific circumstances and local evidence, such as characterisation studies. This option should be considered against a baseline approach, applying the London Plan and Strategic Policies but without further detailed guidance.

16.2.2 The following alternatives have been appraised:

Option 1 - Detailed policy for the siting and design of tall buildings, within identified locations, taking account of site specific circumstances and supported by Haringey's Urban Characterisation study.

Option 2 - Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD.

16.3 Summary appraisal findings

16.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 16.1: Summary appraisal findings: Tall Buildings

Topic	Option 1 - Tall buildings suitable in specific locations, built to specific criteria in compliance with local guidance	Option 2 - Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	2	★1
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	★1	★1
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a

Topic	Option 1 - Tall buildings suitable in specific locations, built to specific criteria in compliance with local guidance	Option 2 - Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD
Town Centres	★ 1	2
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	★ 1	2
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a

Summary

Option 1 is best performing in terms of all objectives, other than those relating to 'housing'. Option 1 would restrict tall buildings to particular areas, protecting the borough's townscape and cultural heritage, while still allowing tall buildings in some areas.

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

- 16.4.1 The preferred option is to develop a more detailed DM policy covering the siting and design of tall buildings, which draws on current tall building guidance. This policy will provide that proposals for tall buildings take better account of local and site specific circumstances, and ensure that such development is appropriately located within the borough, having regard to local character and transport accessibility, along with other considerations.
- 16.4.2 One matter raised in the SA is that the approach may restrict the future supply of housing. The DM Policies DPD has been prepared in view of the relevant emerging site allocations focused DPDs, and these have considered and demonstrated the borough's ability to deliver its strategic housing targets.

17 VIEWS AND VISTAS

17.1 Introduction

17.1.1 The Strategic Policies DPD seeks to protect and manage identified regionally strategic views. There are, however, other specific key views and vistas within the borough that allow a glimpse of important buildings and other features of the urban landscapes. These contribute to local sense of place as well as providing landmarks and a means of wayfinding. Local views and vistas could benefit from additional policy protection, however a balance must be struck to ensure that opportunities for future development are not constrained.

17.2 Reasons for selecting the alternatives dealt with

17.2.1 One option is a policy to minimise disturbance to identified local views and vistas, recognising the role that these can play in contributing to local character. This option is set against a baseline option of protecting only London Plan strategic views, which is a less restrictive policy position by comparison.

17.2.2 The following alternatives have been appraised:

Option 1 - Policy to minimise disturbance of identified local views and vistas

Option 2 - Only protect London Plan strategic views.

17.3 Summary appraisal findings

17.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VIII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 17.1: Summary appraisal findings: Views and vistas

Topic	Option 1 - Policy to minimise disturbance of identified local views and vistas	Option 2 - Only protect London Plan strategic views.
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	2	★1
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	N/a	N/a
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a
Town Centres	★1	2
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	★1	2

Topic	Option 1 - Policy to minimise disturbance of identified local views and vistas	Option 2 - Only protect London Plan strategic views.
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a

Summary

A policy to minimise disturbance to identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough's townscape and cultural heritage resources, as compared to only protecting London Plan strategic views (Option 2). Significant positive effects are predicted in terms of townscape/heritage objectives. However, greater protection of identified local views in addition to Local Plan strategic views could place constraints on housing delivery in some areas.

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

- 17.4.1 The preferred option is for a DM policy which provides stronger protection for identified local views and vistas. The option has particular benefits for sustainability objectives on townscape and cultural heritage.
- 17.4.2 The SA has identified that this option might have the effect of constraining opportunities for the delivery of housing, for example, with taller buildings. The DM Policies DPD has been prepared in view of the relevant Site Allocations DPD, and these have considered and demonstrated the borough's ability to deliver its strategic housing targets.

18 HERITAGE AND CONSERVATION

18.1 Introduction

18.1.1 The historic environment makes an important contribution to local character and residents' sense of place. The Strategic Policies DPD therefore broadly aims to maintain and enhance Haringey's historic environment. National planning policy provides that the Council should protect heritage assets in relation to their significance. Therefore, there is scope for the DM Policies DPD to consider the level of policy weight given to particular heritage assets, and how protection of the historic environment should be positively promoted.

18.2 Reasons for selecting the alternatives dealt with

18.2.1 Haringey has a wide range of heritage assets including designated, statutory listed assets and other non-designated assets. As the Council has a duty to protect statutory listed assets, this baseline option needs to be taken forward. However, an option promoting stronger protection for non-designated assets is also considered, recognising the value these have to local character. Further, for positively promoting the historic environment, an approach favouring adaptive re-use of all heritage assets is set against the baseline policy position.

18.2.2 The following alternatives have been appraised:

Option 1 - Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use

Option 2 - Do not apply policy to non-designated heritage assets.

18.3 Summary appraisal findings

18.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix IX**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 18.1: Summary appraisal findings: Heritage and conservation

Topic	Option 1 - Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use	Option 2 - Do not apply policy to non-designated heritage assets.
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	2	★1
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	2	★1
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a
Town Centres	N/a	N/a

Topic	Option 1 - Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use	Option 2 - Do not apply policy to non-designated heritage assets.
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	★ 1	2
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a
<p><u>Summary</u></p> <p>A policy focus on non-designated assets in addition to designated assets (Option 1) is likely to result in significant positive effects in terms townscape and cultural heritage objectives, and it is not clear that there are any major draw-backs to this approach. There might be some negative implications for housing and economic growth, but (thinking long-term) heritage assets can help enable regeneration and create a sense of place (with positive implications for economy and community objectives).</p>		

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

18.4.1 The approach to provide protection for both designated and non-designated assets (Option 1) is preferred, given the Strategic Policies overarching position to maintain and enhance Haringey's historic environment. The Local Plan needs to help facilitate new development. It is recognised that an overly restrictive policy approach on the historic environment, including non-designated heritage assets, might prohibit new development from coming forward. However the SA has indicated the effect is likely to be limited if the preferred option is implemented, and when considered against the significant effects on objectives for townscape and cultural heritage, the approach is sufficiently justified from a sustainability perspective.

19 CAR FREE OR CAR CAPPED DEVELOPMENTS

19.1 Introduction

19.1.1 The Strategic Policies DPD aims to promote sustainable transport options across the borough, recognising in particular the social and environmental benefits involved. The DM Policies DPD will set detailed policy requirements for new development and provides an opportunity to consider how local parking standards may contribute to delivering on the strategic transport objectives.

19.2 Reasons for selecting the alternatives dealt with

19.2.1 The Council aims to maximise the use of sustainable transport options and to reduce car dependency. The London Plan sets out car parking standards which seek to restrain car use and reduce congestion, particularly to improve local accessibility. The London Plan standards provide a baseline position that should be appraised. However, recognising that some areas of the borough are well connected to public transport with high levels of accessibility, along with controlled parking measures, it is reasonable to consider a locally specific approach which allows for car free or car capped development in these locations.

19.2.2 The following alternatives have been appraised:

Option 1 - Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned

Option 2 - Parking required, in accordance with the London Plan parking standards.

19.3 Summary appraisal findings

19.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix X**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red / green** shading) where necessary and also rank the alternatives in order of preference.

Table 19.1: Summary appraisal findings: Car free or car capped developments

Topic	Option 1 - Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned	Option 2 - Parking required, in accordance with the London Plan parking standards
Crime	N/a	N/a
Education	N/a	N/a
Health		2
Housing	N/a	N/a
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	N/a	N/a
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a
Town Centres	N/a	N/a
Biodiversity	N/a	N/a

Topic	Option 1 - Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned	Option 2 - Parking required, in accordance with the London Plan parking standards
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	★ 1	2
Noise	N/a	N/a
Energy and Carbon	★ 1	2
Waste Management	N/a	N/a
Sustainable Transport	★ 1	2

Summary

Option 1 (limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone in place or planned) is likely to have greater positive effects in terms of encouraging sustainable transport (significant positive effect), health, air quality and climate change mitigation objectives. With large scale development planned within Haringey, an integrated approach to land use and transport planning that minimises the need to travel and encourages the most sustainable travel choices could have a notable positive effect on reducing transport-related greenhouse gas emissions per capita.

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

- 19.4.1 The preferred option is one which provides the flexibility for car free or car capped parking (Option 1). The SA reflects that both policy options score positively on sustainability objectives, however there are notable significant positive effects with the preferred option, Further, the preferred option will support delivery of the Strategic Policies, enabling a more flexible approach to promoting sustainable transport options, where local and site specific circumstances allow, reducing car dependency whilst positively impacting on the environment.

20 ALLOWABLE SOLUTIONS / CARBON OFFSETTING

20.1 Introduction

20.1.1 The Strategic Policies DPD sets out a range of policies on climate change adaptation and mitigation, including requirements to reduce energy use and facilitate low and zero carbon development. The DM Policies DPD provides an opportunity to set further detailed policies and guidance which can help to ensure that new development is designed and constructed in a sustainable way.

20.2 Reasons for selecting the alternatives dealt with

20.2.1 The Strategic Policies require that carbon reduction targets on new development must be achieved on-site. The Government has indicated it may implement a scheme to enable off-site alternatives for carbon offsetting (allowable solutions), including financial contributions which are to be pooled in a national fund. This has yet to be finalised however, and until such time the Strategic Policies remain the baseline option, subject to future national policy and legislation. An alternative option is to set a local framework for allowable solutions, providing a more flexible approach for developers to meet policy requirements.

20.2.2 In light of this discussion, the following alternatives have been appraised:

Option 1 - Allowable solutions (including local carbon offsetting fund) to better enable developers to meet carbon targets

Option 2 - No allowable solutions (CO₂ reductions must be met on site); wait on further Government guidance,

20.3 Summary appraisal findings

20.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XI**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 20.1: Summary appraisal findings: Allowable solutions / carbon offsetting

Topic	Option 1 - Allowable solutions (including local carbon offsetting fund) to better enable developers to meet carbon targets	Option 2 - No allowable solutions (CO ₂ reductions must be met on site); wait on further Government guidance.
Crime	N/a	N/a
Education	N/a	N/a
Health	★ 1	2
Housing	★ 1	2
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	N/a	N/a
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a

Topic	Option 1 - Allowable solutions (including local carbon offsetting fund) to better enable developers to meet carbon targets	Option 2 - No allowable solutions (CO2 reductions must be met on site); wait on further Government guidance.
Town Centres	N/a	N/a
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	★ 1	2
Noise	N/a	N/a
Energy and Carbon	★ 1	2
Waste Management	N/a	N/a
Sustainable Transport	N/a	N/a

Summary

A local carbon offsetting fund (Option 1) could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact on housing could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme. Given that housing quality/condition and issues around fuel poverty are important determinants of health, Option 1 could also improve health outcomes and reduce health inequalities.

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

- 20.4.1 The preferred option is to set a local framework for allowable solutions (Option 1), as this will provide a more flexible approach for developers to meet the policy requirements, taking account of local and site specific circumstances, and viability considerations. The SA highlights in particular the positive effects resulting from allowable solutions, including financial contributions for carbon offsetting being ringfenced into a local fund to support local projects, where the impacts of new development will be experienced. The preferred approach will need to be reviewed and considered subject to any relevant Government policy or regulations coming into force.

21 COMMUNITY INFRASTRUCTURE

21.1 Introduction

21.1.1 Community infrastructure is integral to the creation of balanced and sustainable communities, promoting social interaction and enhancing the quality of life within local neighbourhoods. Planning for community infrastructure is a key challenge and the Local Plan seeks to ensure the needs of Haringey's existing and future population are met.

21.2 Reasons for selecting the alternatives dealt with

21.2.1 Given the likely sustained demand for community infrastructure in the borough, it is reasonable to consider a policy option which broadly supports proposals for new or extended facilities, irrespective of their location. This should be considered against an option which is more prescriptive, setting location specific requirements for development, particularly in view of the spatial strategy growth areas and identified areas of infrastructure need.

21.2.2 The following alternatives have been appraised:

Option 1 - Policy to set location requirements for new / extended community facilities

Option 2 - No specific location requirements - accept facilities wherever proposed.

21.3 Summary appraisal findings

21.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix XII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects' (using **red** / **green** shading) where necessary and also rank the alternatives in order of preference.

Table 21.1: Summary appraisal findings: Community infrastructure

Topic	Option 1 - Policy to set location requirements for new / extended community facilities	Option 2 - No specific location requirements - accept facilities wherever proposed.
Crime	★ 1	2
Education	★ 1	2
Health	★ 1	2
Housing	N/a	N/a
Community Cohesion	★ 1	2
Accessibility	★ 1	2
Economic Growth	N/a	N/a
Skills and Training	★ 1	2
Economic Inclusion	★ 1	2

Topic	Option 1 - Policy to set location requirements for new / extended community facilities	Option 2 - No specific location requirements - accept facilities wherever proposed.
Town Centres	N/a	N/a
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	N/a	N/a
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	★ 1	2

Summary

Community Infrastructure assets can help to enable regeneration and create a sense of place and improve people's quality of life. Haringey has existing pockets of deprivation and also areas of deficiency for different types of community infrastructure, as well as new growth in the pipeline that will need supporting infrastructure. Therefore, by locating new and enhanced infrastructure in specific locations, Option 1 is more likely to benefit existing and future residents than Option 2 which could take place anywhere in the borough. No draw-backs to Option 1 have been identified.

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

21.4.1 The SA has highlighted the significant positive effects of a policy that sets location requirements for community infrastructure (Option 1). The option is preferred as it is more likely to support the creation of sustainable communities through an integrated and plan-led process, rather than an ad-hoc basis. This will help to ensure that infrastructure is situated in areas of growth, where need is identified and in highly accessible locations. Further considerations for infrastructure may be covered by the Site Allocations DPD, however the DM DPD will complement any such policies.

PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?

22 INTRODUCTION (TO PART 3)

The report must include...

- The likely significant effects associated with the draft plan approach; and
- The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan approach

22.1.1 This part of the report presents appraisal findings in relation to the draft DPD as it currently stands, i.e. as presented within the current consultation document.

23 APPRAISAL OF THE DRAFT PLAN

23.1 Methodology

23.1.1 The appraisal identifies and evaluates 'likely significant effects' of the preferred approach on the baseline, drawing on the sustainability topics and objectives identified through scoping (see Part 1) as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

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

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

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

23.1.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹³ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect 'characteristics' are described within the appraisal as appropriate.

¹³ Environmental Assessment of Plans and Programmes Regulations 2004

23.2 Crime

- 23.2.1 The approach set out in **DM 01** (Delivering High Quality Design) establishes that any new development proposal should be designed to make a positive contribution to a place. The layout and design of a place often plays a key relationship with the level of crime an area suffers from. High quality design can help contribute to the reduction in crime levels as well as the fear of crime. This is further enhanced by **DM 02** (Design Standards and Quality of Life) which requires development proposals to secure inclusive environments that can be used safely. This emphasises how the built environment design can influence safety, crime and the fear of crime.
- 23.2.2 **DM 12** (Management of the Historic Environment) promotes the innovative reuse of vacant listed buildings, encouraging redevelopment of buildings that would otherwise not be developed due to their sensitivity. This positive policy approach should reduce the number of vacant, derelict or dilapidated buildings in the borough and therefore reduce the potential for crime and anti-social behaviour. Furthermore **DM 53** (Development within Town Centres) allows the change of use for A1 uses within Metropolitan and District Centres if the premises have been vacant for a period of more than 24 months.
- 23.2.3 Other policies that could have implications for crime include:
- **DM 07** (Shopfronts (including signage) and On Street Dining) requires shopfronts to contribute to a safe and attractive environment.
 - **DM 08** (Advertisements) requires advertisements to contribute to a safe environment that discourages graffiti.
- 23.2.4 In **conclusion**, the proposed approach to DM policy should have the effect of reducing levels of crime in Haringey. It has a strong focus on developing vacant and derelict buildings (including historic buildings), and policies also seek to use positive design in order to 'design-out' crime and reduce the fear of crime. However, it is not clear that significant effects will result, given the wider determinants of crime.

23.3 Education

- 23.3.1 The approach set out in **DM 57** (Access to Jobs and Training) establishes that planning contributions will be sought for to facilitate opportunities for local employment training, including apprenticeships and work experience placements. This helps ensure that education after school age is still available for the local population. In the long term this would likely help provide more skilled labour to the economy.
- 23.3.2 **DM 58** (Managing the Provision of Community Infrastructure) seeks to protect existing community infrastructure; and **DM 59** (Managing the Quality of Community Infrastructure) seeks to ensure that new development delivers the required supporting infrastructure and also additional infrastructure in suitable locations, delivering identified infrastructure listed in the Infrastructure Delivery Plan (IDP). These two policies seek to protect existing infrastructure (including education facilities) and, where necessary, extend or enhance existing infrastructure or provide new facilities.
- 23.3.3 In **conclusion**, the proposed policies around education infrastructure seek to increase the quantity, quality and accessibility of provision in the borough, enhancing existing infrastructure and delivering new infrastructure where necessary in order to support growth. The policies should therefore lead to **significant positive effects** in terms of education objectives.

23.4 Health

- 23.4.1 **DM 02** (Design Standards and Quality of Life) requires all developments to secure healthy environments to help promote healthy lifestyles and in the long term prolong life expectancy and improve well-being. A means of achieving this is through the creation of good quality accessible open space that also provides outdoor sports facilities.
- 23.4.2 **DM 26** (Open Space) requires that residential development in Areas of Open Space Deficiency should provide new open space or improve existing open space, which should encourage exercise and recreation for existing and future residents. The Council also promotes the provision of leisure facilities on these open space areas so to promote healthy lifestyles while using these areas.
- 23.4.3 **DM 34** (Environmental Protection) focuses on protecting the environment from the adverse effects of human activities. Through the mitigation of negative effects on air quality during construction and the lifetime of developments, the health of nearby residents should not be adversely affected. Furthermore this policy recommends that new development will only be permitted where it is demonstrated that any risks associated with land contamination, including to human health, is addressed beforehand.
- 23.4.4 **DM 56** (Hot Food Takeaways) strongly supports the restriction of hot food takeaway shops 400m from primary and secondary schools and the granting of planning permission for hot food take-away shops outside this exclusion zone has strong requirements that it must meet. This would help to address obesity for residents in Haringey, particularly for children attending secondary school.
- 23.4.5 **DM 42** (Sustainable Transport) promotes active travel (cycling and walking) which should help encourage healthy lifestyles; and also promotes improved public transport which is likely to lead to minor improvements in air quality through displacing car users, reducing emissions and pollution from road transport
- 23.4.6 Other policies that could have implications for health include:
- **DM 25** (Nature Conservation) seeks for major developments on sites located within areas of deficiency to maximise opportunities to improve access to nature.
 - **DM 27** (Green Grid) promotes a network of open spaces through the London Green Grid.
 - **DM 28** (Allowable Solutions) the need to reduce CO₂ emissions, whether on-site or off-site.
 - **DM 32** (Living Roofs and Green Walls)
 - **DM 58** (Managing the Provision of Community Infrastructure) states the Council will resist the loss of existing social and community facilities.
- 23.4.7 In **conclusion**, the proposed policy approach focuses on improving the health and wellbeing of the local residents through increasing access to and quality of open space; restricting the locations that hot food takeaways can operate from; and encouraging active travel and sustainable transport. This should help to encourage active lifestyles and avoid consumption of unhealthy foods. The DM Policies DPD should result in **significant positive effects** on the health of local residents, particularly as a result of improvements to the quality of open space provision.

23.5 Housing

- 23.5.1 **DM 01** (Delivering High Quality Design) underlines how all new development needs to be built to a high quality using sustainable design and construction techniques. The creation of balanced communities is supported in **DM 17** (Housing Mix) through the provision of housing developments providing a mix of tenure type for housing, especially in areas that have affordable rented housing dominating or where affordable rented housing is under represented.
- 23.5.2 **DM 16** (Housing Supply) sets out the housing delivery aims for the London Borough of Haringey, which expects the maximum appropriate contribution of housing on all sites across all tenures and loss of existing housing only when the housing is replaced with at least equivalent floorspace. **DM 17** (Housing Mix) provides flexibility in the application of the London Plan density matrix, and should help meet a good portion of the markets needs while still being of high quality.
- 23.5.3 Affordable housing levels will be increased through **DM 19** (Affordable Housing), which in line with SP2 of the Strategic Policies, sets a maximum 70% affordable rent on new development sites, with the rate specifically being decided from viability assessments for each proposal. Furthermore with the 'tenure blind' approach houses will be better integrated with each other. The current Local Authority housing stock is encouraged to be improved upon through **DM 29** (Sustainable Refurbishment and Retrofitting) with the promotion of sustainable retrofitting. These improvements are required to meet at least an 'excellent' rating of the BREEAM Domestic Refurbishment which will make a vast difference in providing better quality housing for the residents.
- 23.5.4 **DM 21** (Specialist Housing) focuses on the provision of specialist housing, which includes sheltered housing and care homes, housing for older people, student accommodation and hostel accommodation. There is a growing demand for older people's housing as people are living for longer and remaining economically active for longer, and older people's housing can help older people to retain independence and to ensure that older people are not isolated or detached from their communities. Bespoke specialist housing has the potential to deliver more appropriate housing for those that need it, whilst freeing up/preventing the loss of housing stock for families.
- 23.5.5 Loss of family housing to Houses in Multiple Occupation (HMOs) is a key issue in Haringey. **DM 23** (Houses in Multiple Occupation) seeks to restrict the conversion of housing into HMOs so that Haringey can maintain a stock of larger homes in the priority areas for families, and to reduce the risk of the larger housing stock from being completely converted. This does not completely restrict HMOs and housing conversions altogether but it does strengthen the requirements so that HMOs that do come forward are higher quality and in more accessible locations. Maintaining diversity in the housing stock will lead to secondary benefits in terms of diversity in the community.
- 23.5.6 Other policies that could have implications for housing include:
- **DM 02** (Design Standards and Quality of Life) through promoting environments that are well designed and sensitive to the local context
 - **DM 05** (Sitting and Design of Tall and Large Buildings)
 - **DM 17** (Housing Mix) through promoting a mix of housing types, density and tenure
 - **DM 20** (Self-build and Custom Build Housing) seeks to support this type of housing
 - **DM 22** (Residential conversions)
 - **DM 24** (Basement development and lightwells)
 - **DM 51** (Warehouse living) will only be allowed in locations where they are supported by site-specific allocations.

23.5.7 In **conclusion**, the proposed policies focus on ensuring that Haringey maintains a mix of housing in order to meet housing needs, that new development is mixed in tenure, allowing for regeneration, renewal and refurbishment of the existing dwelling stock where necessary. As such, the DM Policies DPD should lead to **significant positive effects**. Furthermore, flexibility over higher housing densities will be permitted (subject to criteria) which will assist Haringey in meeting its housing targets in a highly built-up borough.

23.6 Community cohesion

23.6.1 The policies with perhaps the greatest bearing on community cohesion are those that deal with community infrastructure. **DM 58** (Managing the Provision of Community infrastructure) seeks to protect existing community infrastructure and **DM 59** (Managing the Quality of Community Infrastructure) seeks to ensure that new development delivers the required supporting infrastructure and also additional infrastructure in suitable locations, delivering identified infrastructure listed in the Infrastructure Delivery Plan. These two policies seek to protect existing infrastructure and, where necessary, extend or enhance existing infrastructure or provide new facilities. This should lead to benefits in terms of increasing accessibility to community infrastructure and encouraging social cohesion and fostering social capital.

23.6.2 The way buildings are placed and how they interact with each other can play a major role in the community cohesion of an area. High quality design can create environments that promote a sense of cultural identity and bring people together. **DM 01** (Delivering High Quality Design) encourages this through requiring new development to demonstrate how they relate positively to neighbouring structures to create a harmonious whole and how they will make a positive contribution to a place. Furthermore, **DM 02** (Design Standards and Quality of Life) seeks to create inclusive environments that do not discriminate against people regardless of their ethnicity, gender, age, disability, childcare responsibilities or economic circumstances. The inclusive design requirements should lead to benefits in terms of supporting strong relationships between people from different backgrounds and communities, and encourage social mixing.

23.6.3 Local distinctiveness can be enhanced in new developments through public art (**DM 04**). This has the potential to create a sense of cultural identity and brings more uniqueness to the area of Haringey.

23.6.4 **DM 17** (Housing Mix) seeks to create a more balanced mix of tenure in housing areas, which will result in strong relationships between people from different backgrounds and communities. This will create more community cohesion that is greatly beneficial for the area especially with the Tottenham riots that highlight a need for this.

23.6.5 Other policies that could have implications for community cohesion include:

- DM 19 (Affordable Housing) calls for a 'tenure blind' approach to mixed tenure residential development proposals to ensure homes across tenures are indistinguishable from one another.

23.6.6 In **conclusion**, the proposed approach to addressing community infrastructure through the DM Policies DPD seeks to increase quantity, quality and accessibility in relation to community infrastructure, enhancing existing infrastructure and delivering new infrastructure where necessary. The policies should therefore lead to **significant positive effects** in terms of access to community infrastructure and other community related objectives. Furthermore, cultural identity, belonging and well-being will be promoted through public art schemes, and higher quality in design supporting a more harmonious public realm. More generally, strong relationships between people from different backgrounds and communities are encouraged through efforts to ensure inclusive environments that do not discriminate against anyone and through the promotion of a mix of tenure housing. The Tottenham riots of 2011 highlight the need of greater community cohesion in the borough.

23.7 Accessibility

- 23.7.1 The improvement of accessibility to facilities is promoted in **DM 07** (Shopfronts (including signage) and On Street Dining) through requiring the alterations of existing shopfronts or design of new shopfronts to take account of requirements for easy accessibility for all members of the community. This will assist in reducing inequalities in accessibility for disabled people, parents with small children and those with limited mobility. The improvement of access to open space and other leisure facilities is sought for in **DM 26** (Open Space) through the requirement of new housing developments having to improve upon or create new open space.
- 23.7.2 **DM 42** (Sustainable Transport) focuses on the promotion of sustainable transport, especially where development will lead to high trip generation rates. This focuses on the protection, improvement and creation of pedestrian and cycle routes. This would not only improve transport links for the borough, it would also likely decrease CO₂ emissions and pollution emitted and lead to positive health effects.
- 23.7.3 Proposals for new and extended social and community facilities are required to be located where they are accessible by public transport, walking and cycling, according to **DM 59** (Managing the quality of Community Infrastructure). This would ensure good access to essential services and facilities, and helps provide access for all people across a number of transport modes.
- 23.7.4 Other policies that could have implications for accessibility include:
- DM 27 (Green Grid)
 - DM 58 (Managing the Provision of Community Infrastructure) states the Council will resist the loss of existing social and community facilities unless a replacement facility is provided which meets the needs of the community, and therefore would be accessible to get to for the local residents.
- 23.7.5 In **conclusion**, steps are set to be taken to improve the accessibility of the key services and facilities in Haringey; and there is support for sustainable transport, especially for developments that have high trip generation rates. Notably, key services will be required to locate in areas easily accessible by public transport, and new leisure facilities are required to be easily accessible by all members of the community. It is understood that additional work around delivery of community infrastructure will be progressed in line with the updated Infrastructure Delivery Plan (IDP); and on that basis significant positive effects are not predicted.

23.8 Economic growth

- 23.8.1 **DM 48** (Safeguarding Employment Land Sites) seeks to maintain existing employment land provision and provide an appropriate range of facilities and services through the use of various land designations, including non-allocated employment land. This should help facilitate economic growth by safeguarding the most important sites for economic and employment purposes.
- 23.8.2 **DM 49** (Maximising the Use of Employment Land Sites) seeks to maximise the use of employment land within the borough through a gradual restructuring of the borough's employment land portfolio. This is to enable the modernisation of old stock where this is no longer suited to current needs, to attract a wider range of businesses to the borough, and to regenerate employment land in highly accessible areas. Improving employment sites and increasing job densities should assist in delivering further opportunities in terms of local jobs as well as a possibility of a shift towards higher paid sectors.

- 23.8.3 The Council recognises, however, that there remains a demand for lower employment densities which are more suited to traditional industrial activities. Additionally **DM 50** (Facilitating Site Regeneration and Renewal) and **DM 51** (Warehouse living) support the regeneration of designated sites to provide mixed-use developments “where this is necessary to facilitate renewal and regeneration”, taking account of viability considerations.
- 23.8.4 **DM 52** (Loss of Employment Land) aims to preserve current land used as employment uses, however recognises that it is important to promote economic growth by ensuring that sites are not protected needlessly when there is no reasonable prospect of them coming forward for specific types of development. By allowing flexibility it supports the regeneration of the town centre and surrounding areas in a manner that should be sufficient to sustain the economic role and functions of settlements in the borough.
- 23.8.5 **DM 54** (Town Centre Uses Out of Recognised Centres) sets a threshold for new developments outside recognised town centres providing that they satisfy the sequential test in the National Planning Policy Framework.
- 23.8.6 It is also worth noting that a number of other policies could have implications for economic growth, albeit to a lesser extent. These policies include:
- DM 16 (Housing Supply) and DM 17 (Housing Mix) seek to meet housing need sustainably in the borough. New housing in sustainable locations could benefit economic growth by increasing the size of the workforce in the borough and the quality and affordability of housing; potentially attracting businesses to the area.
 - DM 42 (Sustainable Transport) seeks to improve public transport, walking and cycling provision which could improve accessibility to work for employees as well as encourage people to travel and spend money within the local economy.
 - DM 26 (Open Space) and DM 27 (Green Grid) would improve the quality of the natural and built environment. This could help draw businesses to the borough through providing a high quality environment which is attractive to business.
- 23.8.7 **In conclusion**, policies should lead to widely enhanced local employment opportunities and facilitate redevelopment of under-used employment sites. The net effect should be to grow and diversify the local economy, and hence **significant positive effects** are predicted; however, there may be some instances where particular sectors find it more difficult to operate in Haringey.

23.9 Skills and training

- 23.9.1 **DM 57** (Access to Jobs and Training) seeks to create local opportunities for employment and training including both apprenticeships and work experience. This would aid in the up skilling of the local labour force and would provide opportunities for the unemployed.
- 23.9.2 In **conclusion**, policies are unlikely to lead to significant effects. Given that Haringey’s unemployment rates are above the national average, the following **recommendation** is made:
- Consider introducing a requirement to employ a proportion of local residents as part of employment proposals and during the construction phase of major development schemes.

23.10 Economic inclusion

- 23.10.1 **DM 19** (Affordable Housing) seeks to ensure that the maximum reasonable amount of affordable housing provision is secured, in line with Strategic Policy SP2. This would likely allow more financially constrained residents have a better physical accessibility to local and London-wide jobs and opportunities; and allow those on low incomes to access employment opportunities that they would not otherwise be able to access if required to pay full market rates.

- 23.10.2 **DM 49** (Maximising the Use of Employment Land and Sites) seeks to maximise employment densities on sites and deliver a higher number of jobs through modernising stock and intensifying the land use. This may lead to positive effects in terms of attracting prospective employers to Haringey as well as delivering new jobs that can potentially be taken up by local residents.
- 23.10.3 **DM 51** (Warehouse Living) allows a bespoke housing product within designated areas. Warehouse living units can help facilitate flexible working patterns through encouraging new housing in sustainable locations that enable the user to work within the unit.
- 23.10.4 **DM 57** (Access to Jobs and Training) seeks to create local opportunities for employment and training through apprenticeships and work experience. This would aid in the up skilling of the local labour force and would improve accessibility to local employment opportunities delivered through the plan, and also London-wide jobs planned elsewhere.
- 23.10.5 In **conclusion**, the preferred approach is likely to lead to positive effects in terms of economic inclusion through delivering additional jobs, affordable housing and supporting warehouse living units where suitable. However, it is not clear that significant positive effects will result, given some uncertainties around the link between job creation and the characteristics of the local workforce.

23.11 Town centres

- 23.11.1 **DM 01** (Delivering High Quality Design) and **DM02** (Design Standards and Quality of Life) should ensure that development proposals accord with the design principles for the locality as well as national and regional policy. The policies expect proposals to apply and incorporate locally distinctive architectural styles in accordance with the particular area's characteristics while conserving or enhancing local biodiversity interest. In doing so it should lead to significant positive impacts in supporting local distinctiveness and build quality while minimising impact on the local environment. Similarly, **DM 06** (Locally Important Views and Vistas) should also help to conserve the borough's local character through the need for proposals to demonstrate that they would minimise disturbance to any Locally Significant Views.
- 23.11.2 **DM 07** (Shopfronts (including signage) and On Street Dining) and **DM 08** (Advertisements) both seek to ensure that development is appropriate in design and appearance, compatible with its surroundings and that it retains important landscape features. In particular DM 07 seeks to protect the identity and quality of the town centre; and seeks to ensure that replacement buildings will actually bring about improvements and conversions which positively contribute to the established local character and sense of place.
- 23.11.3 With regard to town centre development, **DM 53** (Development Within Town Centres) seeks to maintain and enhance existing provision and provide an appropriate range of facilities and services; provide opportunities for commercial development including retail and leisure; improve and enhance vitality and viability and improve the links between employment, shopping and services. This approach should help improve the attractiveness and vitality of town centres, in particular at Wood Green as the borough's principal centre and a Metropolitan Centre in the London Plan.
- 23.11.4 **DM 54** (Town Centre Uses Out of Recognised Centres) sets a threshold for new developments outside recognised town centres and when it is passed the developments will be required to demonstrate that they satisfy the sequential test in the National Planning Policy Framework. This policy should preserve the role and function of settlements in the borough and ensure that 'out of town' retail complements town centre uses.

- 23.11.5 **DM 55** (Betting Shops) and **DM 56** (Hot Food Takeaways) seek to ensure that and hot food takeaway and betting shops do not cluster and significantly affect the quality of the environment in centres. The policies seek to protect the identity and quality of the town centre, recognising that cluster of these uses can affect the character of a centre, and that there needs to be a variety of shops and services on the high street.
- 23.11.6 In **conclusion**, the proposed approach is likely to help to ensure that vitality and vibrancy of town centres can be enhanced, whilst ensuring that the borough's town centres are easily accessible and meet local needs and requirements. Policies seek to promote high quality design and public realm and address potential clusters of hot food takeaways and betting shops that can be detrimental to centres. **Significant positive effects** are likely.

23.12 Biodiversity

- 23.12.1 The borough contains a range of wildlife sites, from local to international significance, in addition to non-protected areas of importance to biodiversity in the wider landscape, such as wildlife corridors. **DM 25** (Nature Conservation) seeks to protect and enhance the diversity and richness of the borough's flora and fauna to provide a rich and varied landscape and ecological foundation to Haringey. The policy also aims to provide protection to existing trees and to improve the contribution trees make to the local landscape character. In line with this, **DM 26** (Open Space) outlines that for any local open space improvements, it must prove to not have a detrimental impact on nature conservation and biodiversity. Additionally **DM 27** (Green Grid) seeks to connect all new developments to the All London Green Grid.
- 23.12.2 The approach outlined in **DM 32** (Living Roofs and Green Walls) addresses the important contribution vacant roof space and vertical surfaces can have to climate change adaptation when being used for urban greening. This policy has positive implications for biodiversity however acknowledges that in some cases it could be impractical. Therefore this is likely to only lead to a minor positive effect for biodiversity.
- 23.12.3 In **conclusion**, the proposed policies would likely result in **significant positive effects** in terms of biodiversity, through protecting and enhancing designated and non-designated sites, providing greater connectivity between sites and delivering enhanced open space.

23.13 Townscape and cultural heritage

- 23.13.1 Townscape character and cultural heritage are given due consideration through **DM 01** (Delivering High Quality Design) and **DM 02** (Design Standards and Quality of Life) as development proposals are required to deliver high quality design and demonstrate how they respond to the character of the development site and the surrounding area/street scene. This should ensure that new development complements surrounding buildings and enhances the character of Haringey.
- 23.13.2 Locally Significant Views are important visual corridors in Haringey. **DM 06** (Locally Important Views and Vistas) aims to manage these views by requiring development proposals to demonstrate how they will harness the opportunities these views present and minimise disturbance on these views. This assists in protecting the visual amenity of Haringey from insensitive or out of character development.
- 23.13.3 **DM 05** (Siting and Design of Tall and Large Buildings) helps to protect the local and historic environment by ensuring that tall and large buildings are situated in appropriate locations and do not result in unacceptable impacts on townscape character, cultural heritage and its setting. Furthermore the Council is seeking the retention of traditional shopfronts of distinctive character that contribute to the visual, architectural or historic quality of the local townscape via **DM 07** (Shopfronts (including signage) and On Street Dining). Also, advertisements are to be more tightly controlled through **DM 08** (Advertisements). There is a requirement for adverts to be of a high standard and sensitive to their visual appearance on buildings; especially in the case of listed buildings and conservation areas.

- 23.13.4 **DM 14** (Façade Retention) also restricts development that retains only the facade of a building with heritage interest, except for in exceptional circumstances. This is to retain the structural and architectural integrity and cellular plan form of the traditional buildings. **DM 15** (Archaeology) requires development proposals in designated Archaeological Priority Areas to be assessed and evaluated prior to development; and may require significant finds to be excavated or preserved in situ. This would ensure that potential archaeological heritage is protected and not sterilised by development.
- 23.13.5 **DM 12** (Management of the Historic Environment) and **DM 13** (Heritage Led Regeneration) will ensure that assets are preserved and enhanced. DM 12 supports proposals that secure the preservation, conservation or enhancement of heritage assets and their settings, outlines when loss of a heritage asset would be acceptable, supports modern contemporary designs that are sympathetic to the local character and the support of the reuse of vacant listed buildings. The policy, and that of DM 13, does support the redevelopment of these listed buildings (subject to criteria) which could potentially lead to negative effects on these assets; however the criteria are quite stringent. DM 13 promotes the utilisation of heritage assets as a catalyst for regeneration of the wider area. These policies contribute to the positive use of historic assets in Haringey and the sustainable and sensitive redevelopment of them to help meet identified needs but also retain cultural heritage assets.
- 23.13.6 **DM 33** (Improving the Sustainability of Heritage Assets) seeks to improve the sustainability of heritage assets to preserve and enhance these buildings of architectural and historical interest. This is aimed to be achieved through the promotion of sustainable design and construction techniques that respects the heritage significance of buildings, their detailing and material, , making them more attractable to live and work in while extending their lifespan, and therefore a sustainable way to protect these assets while making greater use out of them.
- 23.13.7 Other policies that could have implications for townscape and cultural heritage include:
- **DM 60** (Public Houses) where any permitted change of use does not affect any significant features of historic or character value.
- 23.13.8 In **conclusion**, the proposed approach would lead to **significant positive effects** on development in terms of the townscape and cultural heritage. Policy will be in place to protect and enhance existing assets, but also allow them to be modified where appropriate. Locally Significant Views will be protected and policy seeks to site tall and large buildings in the most appropriate locations.

23.14 Open space

- 23.14.1 The approach set out in **DM 25** (Nature Conservation) notes that development is not to lead to adverse effects on designated sites and will be protected unless the benefits of new development outweigh nature conservation or scientific interest; and that new development is to conserve and enhance the natural environment, including all sites of ecological or geological value, with legally protected flora and fauna to be safeguarded.
- 23.14.2 **DM 26** (Open Space) seeks to ensure that the boroughs open space and similarly designated land are enhanced and protected from inappropriate development. This should also result in positive effects as it will ensure that development proposals do not lead to the whole or partial loss of open spaces without an assessment of the current level of provision, and the creation of a suitable replacement where necessary or financial contributions to enable the provision of new open spaces.
- 23.14.3 **DM 27** (Green Grid) outlines the requirements to where possible, to connect all new or replacement open space, to the London Green Grid. This policy will contribute a positive effect to the boroughs open space by promoting the use of pedestrian and cycle linkages within and between the Green Grid.

23.14.4 Other policies that could have implications for open space include:

- DM 34 (Environmental Protection)

23.14.5 In **conclusion**, policy measures should help to ensure that **significant positive effects** are achieved against the baseline, particularly through improving the quality of existing open spaces. However, the positive effects of policies in terms of promoting a network of quality accessible open spaces on development sites could be improved upon by emphasising the role which enhancements to open space can make in terms of green infrastructure and the Green Grid. This **recommendation** should be given consideration by the Council.

23.15 Water resources

23.15.1 **DM 24** (Basement Development and Lightwells) provides criteria for planning applications for basement development and lightwells. The policy has a general reference to development not causing harm to the natural environment. It also contains specific reference to not causing harm to the local water environment, ground conditions and biodiversity. This would provide protection to both surface water and groundwater resources.

23.15.2 **DM 32** (Living Roofs and Green Walls) requires new development to incorporate living roofs and green walls into their design as far as it is practicable to do so. While living roofs and green walls are primarily promoted in order to manage water run-off rates, they can also have benefits in terms of improving the quality of run-off water.

23.15.3 **DM 35** (Managing and Reducing Flood Risk) focuses on managing flood risk and contained overall key principles when designing schemes in flood prone areas. These principles include contributing to the naturalisation of watercourses and managing water and waste water discharges (in line with **DM 38**, Managing drainage connections and waste water), both of which would be expected to contribute positively to enhancing to quality of the borough's water resources.

23.15.4 **DM 37** (Sustainable Drainage Systems) promotes the use of Sustainable Drainage Systems (SuDS) for developments. While the focus of SuDS tends to be primarily on managing water run-off and infiltration rates, the policy states that systems should also be designed to result in a net improvement in water quality and provide for clean and safe water at the surface.

23.15.5 **DM 39** (Protecting and Improving Groundwater Quality and Quantity) focuses on protecting groundwater and requires, amongst other things, that development does not adversely affect groundwater quality during design, construction or operation. The policy gives further direction specifically on limiting disturbance to natural groundwater flows and emphasises that planning permission will be refused where development presents unacceptable risks to groundwater in source protection zones (SPZs).

23.15.6 **DM 40** (Watercourses and Flood Defences) promotes the naturalisation of watercourses, in accordance with the Thames River Basin Management Plan and the London River Restoration Action Plan. The policy also provides direction on culverts, stating that there is general presumption against development where culverting would adversely affect the functioning of main rivers and ordinary watercourses. Furthermore, development on sites already containing culverted watercourses, are expected to investigate measures to restore sections of the watercourse.

23.15.7 **DM 41** (Managing Drainage Connections and Waste Water) covers surface water and waste water drainage with the onus on the Council (working with Thames Water) to ensure that there is adequate capacity in the local public sewer network to meet existing and future foreseeable demand. Where connection to the local public sewer is not available for a proposed development, alternative (non-mains) drainage options would be considered but would be subject to control by the Council. The policy also provides the Council with the ability to restrict non-mains drainage in SPZs.

23.15.8 In **conclusion**, the proposed policies related to water resources are expected to have a positive effect in terms of ensuring the protection of water resources at the planning applications stage. Policy will also encourage naturalisation / restoration of watercourses in some cases. The following **recommendation** is made:

- In relation to the restoration/naturalisation of watercourses, DM 40 advocates, where feasible, the restoration of sections of watercourses which are currently culverted. While the general intent of this aspect of the policy is positive and the words 'where feasible' is recognised, the requirement imposed by this aspect of the policy could be regarded as being somewhat open-ended. The policy may benefit from further clarity on the extent of restoration expected and whether de-culverting is always the preferred approach or whether other alternatives may be considered acceptable. If it is decided the policy wording does not require amendment, some further explanatory text may be of benefit to provide further clarity.

23.16 Soil and land quality

23.16.1 The Greater London Authority has identified 29 Previously Developed Land (PDL) sites in Haringey, which cover 84.9ha of land. The vast majority (86%) of PDL is already allocated within the Unitary Development Plan or already have planning permission and only 2% of sites are without planning permission. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL.

23.16.2 The growth aspirations for the borough mean that redevelopment of PDL is likely. The DM Policies DPD as currently drafted does not provide any policy direction promoting the development of PDL; however this is not considered necessary given that 86% of PDL in the Borough has either already been allocated or has planning permission for redevelopment.

23.16.3 PDL can often be contaminated and the borough does contain a number of contaminated sites due to historical industrial uses. Where redevelopment of PDL is proposed, **DM 34** (Environmental Protection) contains protections to manage risks to human and environmental health from potentially contaminated land. The redevelopment of contaminated land (including land containing derelict buildings) could help the remediation of brownfield land.

23.16.4 Other policies that could have implications for soil and land quality include:

- DM 37 (Sustainable Drainage Systems) promotes the use of SuDS for new development but recognises that on some sites, land contamination issue may make the use of SuDS impractical. In these instances, an alternative approach is advocated.

23.16.5 In **conclusion**, it is considered that Policy DM 34 would ensure that the potential environmental and human health risks of development on contaminated land would be adequately considered and managed through the planning process. Significant effects are, however, unlikely.

23.17 Flood risk and climate change

23.17.1 Flood risk is greatest in the east of the borough with Tottenham Hale being the worst affected ward in the borough with more than 50% lying within Flood Zone 2 (low to medium risk of flooding). Northumberland Park to the north of Tottenham Hale is also largely within Flood Zone 2. The wards of Tottenham Green, Seven Sisters and West Green contain smaller areas lying in Flood Zone 2 and Alexandra and White Hart Lane have very small areas at risk from flooding. It should also be noted that small areas within Northumberland Park, Tottenham Hale and Seven Sisters lie within Flood Zone 3, which is land with a high risk of flooding.

- 23.17.2 Amongst other things, climate change is predicted to increase the intensity of rainfall which has the potential to increase flood risk in the borough. This is particularly an issue given the growth aspirations in the Local Plan. Traditionally, urban development has led to an increase in impervious hard surfaces (e.g. roads, car parks, roofs etc.) which typically increases run-off rates from what they would be naturally.
- 23.17.3 **DM 24** (Basement Development and Lightwells) sets out the principles for basement development and lightwells. A major focus of this policy is on ensuring that development, whether underground or above ground, will not cause adverse flooding effects. For proposed underground works a particular additional consideration of the policy is ensuring that development does not increase the risks posed to people and property by flooding. This is a particular consideration for basement extensions to provide habitable rooms.
- 23.17.4 **DM 32** (Living Roofs and Green Walls) promotes the use of living roofs and green walls for development, where it is practicable to do so. Living roofs and green walls can act to absorb rainfall while ultimately reduces runoff and helps to reduce flood risk.
- 23.17.5 **DM 35** (Managing and Reducing Flood Risk: Key principles), **DM 36** (Flood Risk Assessments), **DM 37** (Sustainable Drainage Systems) and **DM 38** (Critical Drainage Areas) will work together to ensure that new development gives due regard to assessing and mitigating flood risk. This means ensuring that the development itself is not subject to an unacceptably high level of risk as well as ensuring that the development does not increase flood risk elsewhere. DM 36 requires a flood risk assessment (FRA) to be undertaken to inform development in flood risk areas. This is likely to be required for flood risk areas in the east of the borough. It is noted also that in developing the Haringey Local Plan, a Strategic FRA was used to inform (amongst other things) the siting of proposed development (referred to as the 'sequential test'). DM 37 requires the use of sustainable drainage system (SuDS) for new development with the primary aim of reducing surface water run-off, which has been identified as the main cause of flooding in the borough. DM 38 contains particular requirements for nine areas in the borough which have been identified as critical drainage areas (CDAs). For development in these areas, additional assessment requirements will apply, recognising that these areas present the highest level of risk.
- 23.17.6 **DM 40** (Watercourses and Flood Defences) applies to sites containing flood defences or in close proximity to flood defences. The policy stipulates minimum separation distances between development and investigating opportunities to remove hard flood defences. It also promotes the investigation of naturalising existing modified watercourse (e.g. through the removal of culverts and hard landscaped channels etc.). Naturalised watercourses can help to reduce the speed of water run-off and offer greater capacity for flood storage.
- 23.17.7 Other policies that could have implications for flood risk and climate change include:
- DM 41 (Managing drainage connections and waste water)
 - DM 44 (Crossovers and Vehicular Accesses)
 - DM 45 (Driveways and front gardens)
- 23.17.8 In **conclusion**, the proposed DM policies provide for an adequate site specific assessment, proportionate to the risk (e.g. Flood Zone 2, Flood Zone 3 or CRA). Policies will also require the use of SuDS for all new development, which is considered highly beneficial. Overall, it is considered that the Plan contains adequate policies to manage flood risk and that there will be a minor positive effect.

23.18 Air quality

- 23.18.1 The whole borough is designated as an Air Quality Management Area (AQMA) for PM10 and NO₂. Major roads provide a significant proportion of PM10 and NO₂ emissions in Haringey. There are no sites within the borough, which are listed as producing emissions to air under the Environment Agency's Pollution Inventory although the Edmonton Solid Waste Incinerator is located just beyond the north-east boundary of the borough.
- 23.18.2 **DM 34** (Environmental Protection) ensures that the effects on air quality of new development are assessed and adequately mitigated. Furthermore, the policy would also mean where air quality assessment are required, they assess the potential effect of air quality on proposed development. This is intended to address air quality having an adverse effect on newly introduced receptors (e.g. if a new residential development was proposed in close proximity to a busy road).
- 23.18.3 With most of the emissions in the borough arising from road traffic emissions, reductions in emissions will be achieved by promoting modal shift to sustainable (and low emissions) forms of transport. One of the main methods of achieving modal shift is to promote development (including higher density development in some areas) in areas which are currently well served by public transport or will be well served in the future. **DM 05** (Siting and Design of Tall and Large Buildings) specifically addresses the clustering of tall buildings and notes that the only areas in the borough where this is likely to be appropriate is above major transport interchanges such as Seven Sisters and Tottenham Hale stations.
- 23.18.4 **DM 21** (Specialist Housing), **DM 22** (Residential Conversions), **DM23** (Houses in Multiple Occupation), **DM 50** (Facilitating Site Regeneration and Renewal) and **DM 57** (Access to Jobs and Training) also promote development in locations served by public transport and walking and cycling and in doing so seek to reduce the need for travel by private motor vehicle. Collectively, this group of policies would be expected to have a positive effect in terms of reducing emissions to air from road traffic.
- 23.18.5 **DM 42** (Sustainable Transport) requires that developments with high trip generating characteristics be located in areas of high public transport accessibility and also that travel plans are produced in accordance with Transport for London thresholds. This policy also seeks that car parking is managed, and in some cases not provided at all, to reduce generated vehicular-based travel.
- 23.18.6 In **conclusion**, the proposed policies reflect a considerable focus on promoting sustainable transport, and hence would be expected to have a positive effect in terms of improving air quality. At this stage it is not possible to provide a further comment on the magnitude of this positive effect.

23.19 Noise

- 23.19.1 The Council supports the Mayor of London's noise strategy 'Sounder City – The Mayor's Ambient Noise Strategy' (March 2004) which focuses on reducing noise through better management of transport systems, town planning and the design of buildings. This also includes minimising the noise on roads and railways and the careful siting of noisy activities.
- 23.19.2 Currently there is no evidence to indicate that exposure to high levels of noise is a widespread issue for the borough (notwithstanding that some receptors may currently experience high levels of noise). With the general intent of the DM Policies DPD being towards facilitating growth in the borough (particularly to meet the London Plan's housing targets), land use intensification as well as mixed use development is likely to occur in a number of selected areas throughout the borough. If not managed properly, there is the potential that development could give rise to adverse noise effects.

- 23.19.3 **DM 34** (Environmental Protection) seeks to ensure that the noise effects of new development are assessed and adequately mitigated. Furthermore, the policy would also mean that, where a noise assessment is required, it would assess the potential effect of existing noise on proposed development. This is intended to address noise having an adverse effect on newly introduced receptors (for instance, if a new residential development was proposed close to an industrial park or a busy road).
- 23.19.4 It is also notable that the DM Policies DPD encourages the use of sustainable forms of transport, such as walking and cycling and public transport (particularly through **DM 2**, **DM 5**, and **DM 42**). In general terms it would be expected that these measures would contribute to a reduction in the number of journeys made by private car compared to how many trips would occur if high quality and convenient alternative transport options were not available. Given that road traffic is a major contributing factor to ambient noise levels, any measure to reduce the number of car trips would be expected to have a positive effect on reducing ambient noise levels for nearby receptors, although the reduction in noise pollution is likely to be relatively minor.
- 23.19.5 In **conclusion**, a focus of the proposed policies is on promoting the use of sustainable forms of transport, which could lead to benefits in terms of noise. With regards to DM 34(B), although the policy is concise it is considered that it provides sufficient policy direction and regulatory control to ensure that potential noise effects are adequately considered and mitigated as part of the development control planning process. Given the growth aspirations in the borough, noise is likely to be a key issue (even where it is not particularly an issue at present).

23.20 Energy and carbon

- 23.20.1 A major challenge for the borough is to accommodate the proposed level of growth within the borough while at the same time reducing carbon emissions. These two objectives potential appear incompatible. However, between 2005 and 2011 the population of Haringey is estimated to have increased by 11% while the total annual CO₂ emissions reduced from 1,037kT to 870kT. This increase is due partly to local carbon reduction initiatives but does also reflect national trends, including year variations in average temperature, the economic downturn, falling real incomes and changes to the power generation fuel mix as we move from coal to gas and more renewable energy.¹⁴ While the reasons for a reduction in the borough's CO₂ emissions between 2005 and 2011 may not be solely due to local initiatives, this does show that it is possible to effectively decouple development and carbon emissions.
- 23.20.2 **DM 02** (Design Standards and Quality of Life) sets out design standards for proposed development. The policy covers a wide range of design considerations with two in particular having energy implications. The policy advocates designing building to encourage the use of stairs over elevators and also promotes the use of natural light as far as possible. Both of these design measures have health benefits but also serve to reduce energy use within buildings.
- 23.20.3 Strategic Policy SP4 requires new developments to reduce energy use and carbon emissions during the design, construction and occupation phases. The policy seeks a step change in carbon emissions reduction in the borough so that all new residential development is zero carbon from 2016 onwards, and all new non-residential development from 2019 onwards. While Local Plan Strategic Policy SP4 should be followed, the DM Policies DPD does recognise that there may be specific circumstances where it is not possible for a proposed development to meet the required CO₂ reduction levels through on-site measures. **DM 28** (Allowable Solutions) provides for alternative 'allowable solutions' where on-site solutions are not practicable. This includes off-site measures or financial contributions (via a section 106 agreement). It is considered that this policy would provide adequate flexibility for development proponents while not undermining the intent of Local Plan Policy SP4.

¹⁴ Haringey Council (2013) Third Annual Carbon Report 2013.

- 23.20.4 **DM 29** (Sustainable Refurbishment and Retrofitting) seeks to improve energy performance of existing building stock by promoting sustainable retrofitting. This policy advocates the use of the BREEAM Domestic Refurbishment Scheme as a means to assess overall energy performance with a minimum rating of 'excellent' sought under the policy.
- 23.20.5 **DM 30** (Decentralised Energy) promotes connections to decentralised energy (DE) networks for new development in line with the London Plan target for 25% of heat and power used in London to be generated through the use of localised DE systems by 2025. DE energy systems generate electricity locally which reduces transmission losses and lowers carbon emissions.
- 23.20.6 **DM 31** (Overheating and Cooling) requires new development proposals to demonstrate how reducing potential overheating and providing natural ventilation has been incorporated into the design of the scheme. **DM 32** (Living Roofs and Green Walls) promotes the use of living roofs and green walls in new developments. As well as having drainage benefits, green walls and living roofs also improve the thermal performance of buildings reducing the need for mechanical heating and cooling. **DM 34** (Environmental Protection) covers lighting and requires energy efficiency to be taken in account in lighting design for new developments. All of these policies promote the use of energy efficient features into the design of new buildings which would be expected to reduce energy consumption and helping to reduce CO₂ emissions from the borough.
- 23.20.7 It is also notable that the DM Policies DPD encourages the use of sustainable forms of transport, such as walking and cycling and public transport (particularly through **DM 2**, **DM 5** and **DM 42**). In general terms it would be expected that these measures would contribute to a reduction in the number of journeys made by private car compared to how many trips would occur if high quality and convenient alternative transport options were not available. This would reduce CO₂ emissions from transport in the borough.
- 23.20.8 Other policies that could have implications for energy and carbon include:
- DM 33 (Improving the sustainability of heritage assets) encourages improvements in the energy efficiency of heritage assets where it is possible to do so without adversely affecting heritage values.
- 23.20.9 In **conclusion**, the DM Policies DPD will have a positive effect in terms of reducing per capita carbon emissions in the borough; however, it is not possible to determine whether this will result in continuing reductions in total CO₂ emissions from the borough to allow the borough to reach its target of a 40% carbon reduction in Haringey by 2020. While the DM Policies DPD will assist in meeting the overall emissions reductions targets for the borough, other measures will also be required, such as those set out in the Council's 'Third Annual Carbon Report 2013'.

23.21 Waste management

- 23.21.1 Every year Haringey residents generate approximately 366kg of waste per person. Overall, residents produced 85,000 tonnes of waste each year. In 2006-2007, 22% of waste was recycled. The remaining residential and commercial waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which generates electricity. Around 75,000 homes currently receive a green box recycling service, enabling them to recycle a wide range of goods. In 2007-2008, Haringey exceeded their recycling and composting target with 25.68% of all waste sent to recycling and composting.
- 23.21.2 **DM 10** (Waste management for New Development) requires that new development makes provision for adequate waste storage and recycling facilities. It also requires the preparation of a waste management plan and encourages on-site composting for development with gardens.
- 23.21.3 Other policies that could have implications for waste management include:
- DM 22 (Residential Conversions) and

- DM 23 (Houses in Multiple Occupation) in relation to providing adequate refuse storage facilities.

23.21.4 In **conclusion**, the approach of the DM Policies DPD in terms of waste should have the effect of encouraging waste management and recycling for new development. Given the growth aspirations for the borough, this would be expected to contribute to a reduction in per capita terms of waste. The proposed DM policies on their own would not be expected to lead to significant reductions in waste volumes in the borough, either in per capita or net terms. Achieving more significant reductions is likely to require measures outside the scope of the DM Policies DPD. No effects are predicted in terms of delivery of waste facilities. This reflects the fact that Haringey Council is one of the seven north London councils developing the North London Waste Plan Development Plan Document.

23.22 Sustainable transport

23.22.1 Many parts of the borough already have relatively good levels of public transport accessibility and walking levels are slightly higher than the London average. The growth aspirations for the borough mean that demand for travel will inevitably increase. Planned integration of development with transport will be essential to ensuring that the increased demand for travel is met primarily using sustainable forms of transport. This will be achieved by giving travellers convenient access to sustainable transport options.

23.22.2 With large scale development planned within Haringey, the overall policy direction of the DM Policies DPD is to promote an integrated approach to land use and transport planning that minimises the need to travel and encourages sustainable travel choices. This can mean focusing land use intensification around transport interchanges (e.g. the siting of tall buildings as set out in **DM 05**). Policies are included that promote the consideration of accessibility by public transport, cycling and walking when considering the location of proposed development for specialist housing (**DM 21**) and housing conversions (**DM 22**).

23.22.3 **DM 42** (Sustainable Transport) requires that developments with high trip generating characteristics be located in areas of high public transport accessibility and also that travel plans are produced in accordance with Transport for London thresholds. This policy (along with **DM 43**) also seeks that car parking is managed, and in some cases not provided at all, to reduce the demand for travel by private cars. **DM 43** (Parking for Development) also promotes the use of car club schemes as a means of reducing car use.

23.22.4 **DM 50** (Facilitating Site Regeneration and Renewal) promotes proposals for mixed-use redevelopment on sites within designated Local Employment Area: Regeneration Areas where this is necessary to facilitate renewal and regeneration. This policy also requires that potential regeneration sites have high levels of public transport accessibility. This policy does also allow for some non-employment uses provided it would not result in an overall net loss of employment floorspace. The enabling of mixed-use development in certain circumstance would have a positive effect in terms of sustainable transport by reducing the need to travel by having a range of land uses in proximity to each other. There is a risk that housing built as part of such mixed-use redevelopment could have poor access to key services such as health care and education and to sustainable transport.

23.22.5 Compared to inner-boroughs in London, Haringey has the third lowest number of people who walk to work. This suggests that Haringey is a 'dormitory' borough to some extent. **DM 57** (Access to Jobs and Training) aims to create more jobs locally, which will help to reduce the demand for commuter travel.

23.22.6 Other policies that could have implications for sustainable transport include:

- DM 27 (Green Grid) provides for improvement of pedestrian and cycle linkages within and between sites within the Green Grid which would be expected to have sustainable transport benefits.

- DM 44 (Crossovers and Vehicular Accesses)
- DM 46 (Cycle storage in front gardens)
- DM 56 (Hot Food Takeaways) in terms of ensuring that the location of new hot food takeaways does not promote unsustainable travel demand, particularly by private cars.
- DM 58 (Managing the quality of Community Infrastructure) in terms of managing potential effects on road safety or traffic generation.

23.22.7 **In conclusion**, the proposed policies will have a **significant positive effect** on encouraging the use of sustainable forms of transport. Ensuring that walking and cycling are actively encouraged as part of new development will be a matter for site specific policy and detailed planning applications, but the borough-wide DM Policies DPD policies will focus growth towards areas with existing or future high levels of public transport accessibility.

23.23 Overall conclusions

23.23.1 The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with significant positive effects identified as likely in terms of: education, health, housing, community cohesion, economic growth, town centres, biodiversity, townscape and cultural heritage, open space and Sustainable transport. Notable positive effects (e.g. around town centre vitality, accessibility / sustainable transport and conserving heritage assets and views) will result from a policy focus on ensuring a targeted approach to high density housing / tall buildings. There is, however, often a degree of uncertainty around predicted positive effects given the important role that will be played by site allocation policy (which in turn will be influenced by the emerging update to the Infrastructure Delivery Plan, IDP).

23.23.2 No significant negative effects are predicted, although risks associated with some policy approaches – in particular policy approaches that will drive a considerable shift in the nature of employment land in Haringey, potentially with implications for economic inclusion – are highlighted. Objectives around ‘energy and carbon’ and ‘open space’ are notable in that there is the theoretical potential to do more (in order to meet carbon reduction standards; and reduce open space deficiencies), but it is recognised that in practice there is no potential to set more stringent policy without compromising other objectives, which are a priority locally (i.e. objectives around housing, regeneration and employment growth). In terms of recommendations, the appraisal highlights a small number of instances where the plan might potentially reword or elaborate on policy wording for particular sustainability issues (crime, skills and training and water resources).

PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

25 INTRODUCTION (TO PART 4)

The report must include...

- Measures envisaged concerning monitoring.

25.1.1 This part of the report explains next steps that will be taken as part of plan-making / SA.

26 PLAN FINALISATION

Publication

26.1.1 Subsequent to the current consultation it is the Council's intention to prepare the final draft ('proposed submission') version of the plan for publication. This will be the version which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report and representations made through the current consultation.

26.1.2 **The SA Report** (as opposed to an *Interim* SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the Regulations. Table 26.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 26.1: Information contained within this Interim SA Report and the forthcoming SA Report

Part / SA Question	This Interim SA Report	The SA Report
Part 1: What's the scope of the SA?	<ul style="list-style-type: none"> • The Scope of the SA; summarised as appropriate. 	
Part 2: What has plan-making / SA involved up to this point?	<ul style="list-style-type: none"> • Reasons for having selected the issues / alternatives that were ('reasonably') a focus of appraisal. • Alternatives appraisal findings. • Reasons for having selected the preferred approach in light of alternatives appraisal. 	<ul style="list-style-type: none"> • Reasons for having selected issues / alternatives that were ('reasonably') a focus of interim appraisal. • Interim appraisal findings. <ul style="list-style-type: none"> • i.e. alternatives appraisal findings and appraisal findings from Part 3 of this report. • Reasons for having selected the preferred (proposed submission) approach in light of interim appraisal.
Part 3: What are the SA findings at this stage?	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft plan. 	<ul style="list-style-type: none"> • Appraisal findings in relation to the draft ('proposed submission') plan.
Part 4: What are the next steps?	<ul style="list-style-type: none"> • A discussion of what happens next. 	<ul style="list-style-type: none"> • A discussion of what happens next; and monitoring proposals.

Submission / adoption

26.1.3 Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination. At Examination a Government appointed Planning Inspector will consider representations (in addition to the SA Report and other sources of evidence) before determining whether the plan is sound (or requires further modifications).

26.1.4 Once found to be 'sound' the plan will be formally adopted by the Council. At the time of Adoption an 'SA Statement' must be published that sets out (amongst other things) *the measures decided concerning monitoring*.

APPENDIX I –HOUSING CONVERSIONS

Introduction

Chapter 10 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for 'housing conversions':

Option 1 - Restricted conversion area to preserve larger and family homes

Option 2 - Do not introduce restricted conversion areas.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

For each of the options, the assessment identifies / evaluates 'likely significant effects' on the baseline, drawing on the sustainability topics / objectives identified through scoping (see Part 1) as a methodological framework.

Red shading is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text. In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of 'significant effects'.

Effects are predicted taking into account the criteria presented within Regulations.¹⁵ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity).

Finally, it is important to emphasise that the approach taken strikes a balance between the desire to ensure rigorous and systematic analysis on the one hand, and ensure **conciseness / accessibility** on the other. Where an issue, or an effect characteristic, is not referenced, the implication is that there is no point to be made that warrants a mention, given the desire to be concise. That is not to say that the issue/characteristic has been entirely overlooked as part of appraisal. Similarly, the 'significance' of effects is only discussed in instances where a clear conclusion can be reached (or there is some uncertainty). In instances where significant effects are not predicted, then significance is not discussed.

¹⁵ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	The preservation of larger and family homes will help preserve more homes for families that will have their own gardens. This should encourage children, along with adults, to spend more time outside which in the long term leads to many health benefits. On the other hand if a lack of smaller, more affordable homes means people are forced to live in sub-standard accommodation or commute long distances, this could have negative health impacts. There is considered to be insufficient evidence to judge the impacts of these two options on health.	N/a	N/a
Housing	The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing in terms of smaller and larger homes; but if allowed to continue unrestrained can lead to a loss of housing mix as larger homes are lost to conversions. The cumulative effect of conversions can have an adverse impact on the character of the existing residential area in terms of the intensification of use, increased parking and introduction of communal bin stores. Without setting a restricted conversion area, it can lead to the loss of smaller family homes, for which there is an anticipated need. Notwithstanding issues related to the standard of accommodation provided following conversions and the impact on the intensification of the amenity of adjacent occupiers. Residential conversions, particularly of smaller properties require management to ensure that an appropriate balance is struck between the contribution conversions make to local housing supply, the demand for family homes with three bedrooms or more and the impact on the character of the local area. The Borough's population is set to increase by 31,234 over the period 2011-2021 indicating higher density housing is needed.		2
Community Cohesion	If it is assumed that the restricted conversion area policy would only be applied to areas with a mix of housing where larger and family housing is under significant pressure for conversion, then Option 1 would be the preferred option as it would help to protect and maintain a variety of housing types in areas where there is pressure to sub-divide the remaining family homes. This should support a more mixed community and encourage the development of relationships between from different backgrounds and communities.		2
Accessibility	No notable implications.	N/a	N/a
Economic Growth	Assuming that there are significant pressures for the conversion of family homes in a number of areas, the failure to set a restricted conversion area is likely to result in greater adverse effects on the availability of family homes, compared to not setting a restricted area. This could affect the type of people that move into the area and thus the type of labour available for the Borough's employment sector. On the other hand, a greater availability of small homes might enable more people to afford to live in the borough and thus have a positive impact on the amount of labour available locally. There is considered to be insufficient evidence to judge the impacts of these two options on economic growth.	N/a	N/a
Skills and Training	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	Enabling building conversions to create more dwellings and higher density living helps use land effectively and efficiently. Therefore allowing conversion to happen all over the borough would allow for higher density housing and more effective use of land.	2	★1
Flood Risk and Climate Change	While there is the potential that per capita emissions could reduce as a result of the more efficient use of space through provision of smaller dwellings within the footprint of an existing dwelling there is no evidence to ascertain this at this stage.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	The conversion of larger houses, that are often not modern, could increase the efficiency of the use of space and enhance energy efficiency (given building regulations requirements for energy efficiency). Therefore not restricting conversion to a particular area could facilitate the energy efficient conversion and retrofitting of more homes, reducing per capita energy consumption and carbon emissions.	2	★1
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p>Summary</p> <p>A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant.</p>			

APPENDIX II – HOUSING DENSITY AND DESIGN

Introduction

Chapter 11 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for housing density and design:

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

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

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	It is not anticipated that the proposed alternatives will have any differential impact on this topic. Historically, high density housing was designed in such a way that it inadvertently facilitated antisocial behaviour, crime and the fear of crime. However if the high density housing is designed effectively (for example through 'Secured By Design' principles) and provides a mix of housing this fear and level of crime should be reduced.	N/a	N/a
Education	The only concern with education would be to make sure that in creating higher density housing, it would be possible to provide enough additional educational capacity to support it. It is assumed that this would be secured through s106 or CIL contributions, therefore it is not anticipated that the proposed alternatives will have any differential impact on this topic.	N/a	N/a
Health	A concern would be creating enough open space and health facilities, such as GP practices, for the residents of these high density developments. This relates to the quality of design and to the ability of the council to secure funding for supporting health, open space and community infrastructure through s106 or CIL contributions. If it is assumed that the council is able to effectively address these issues through implementation then it is considered that the proposed alternatives will not have any differential impact on this topic.	N/a	N/a
Housing	The NPPF and London Plan require authorities to meet their assessed need for market and affordable housing. In some cases this might only be achieved through building higher density buildings to accommodate housing. The NPPF also states that larger developments are sometimes the best means of achieving new homes. With Haringey being a tightly built up borough, available land is restricted. However more homes could be provided on the same land area where higher densities are allowed. Allowing higher densities in some circumstances will help increase the amount of housing provided in the area, including affordable housing.	★1	2
Community Cohesion	Higher density housing has the opportunity to create a strong sense of cultural identity, belonging and well-being and develop opportunities for community involvement. High quality design and the creation of mix of housing types will be critical to achieving this.	★1	2

Topic	Discussion	Opt 1	Opt 2
Accessibility	No notable implications.	N/a	N/a
Economic Growth	The borough has a great housing need, and if left unchecked could lead to the reduction of land available for businesses and reduce economic growth. The promotion of higher density housing can leave more land for business development and enable people looking to live and work in the borough to find homes, increasing the local labour supply.	★1	2
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	Higher density housing can leave more land for business development and enable people looking to live and work in the borough to find homes, increasing the local labour supply and accessibility to local jobs.	★1	2
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	Building at higher densities promotes the efficient and effective use of land because it uses less land to provide more housing for the local residents.	★1	2
Flood Risk and Climate Change	It is not anticipated that the alternatives will have any differential impact on this objective. High quality design including green roofs and sustainable drainage measures should be used to minimise surface water runoff.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	Higher density housing can mean less energy is needed to heat individual dwellings with some heat being distributed across nearby dwellings. This means that new housing, along with modern designs, can be more energy efficient.	★1	2
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	Higher density development could facilitate the development of enhanced sustainable transport solutions that require a critical mass to support them. This would bring benefits for local residents and promote reduced car use.	★1	2
<p><u>Summary</u></p> <p>The Borough is densely populated (86.2 persons per hectare; well above the London average of 52) and the population is set to increase by 31,234 over the period of 2011 to 2021. This indicates that some high density housing schemes are needed, perhaps going beyond what is recommended in the London Plan. Against this background, Option 1 is seen to perform well in terms of sustainability objectives. As well as benefits in terms housing objectives, targeted high density development in Haringey is supported in terms of 'sustainable transport', 'reducing per capita carbon emissions' and 'increasing accessibility to local jobs'. However, there are risks around access to health care and community infrastructure more generally.</p>			

APPENDIX III – EMPLOYMENT SITES (1)

Introduction

Chapter 12 (within ‘Part 2’, above) presents summary appraisal findings in relation to the following alternatives for employment sites:

Option 1 - Requirement to maximise employment densities on sites

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

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Not maximising on high employment densities could lead to continued high unemployment levels, with Tottenham having some of the highest levels of unemployment in London and the UK. High unemployment areas can often lead to higher crime rates and antisocial behaviour.	★1	2
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	It is not anticipated that the proposed alternatives will have any differential impact on this topic. However it is noted that high unemployment levels can often have a direct effect on the levels of home ownership.	N/a	N/a
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	No notable implications.	N/a	N/a
Economic Growth	There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. 22% of businesses in Haringey cite the size of their current premises as a ‘major problem’. This could indicate the need of newer, more appropriate office space for the businesses that dominate the area, mainly falling into B1 use. Overall economic growth is more likely to occur from B1 and B2 uses as these have not declined over recent years while other uses have, therefore showing where investment would be most beneficial for the economy of the local area. By maximising employment densities (Option 1) there would be an increase in the number of jobs within the same amount of floorspace, and as such could lead to higher rates of employment than under Option 2. This is likely to lead to a significant positive effect . Option 2 would operate a more flexible approach to employment which could potentially better-respond to market dynamics, however is likely to result in fewer jobs than Option 1.	★1	2
Skills and Training	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	The encouragement of new businesses is more likely to occur from Option 1 because, as noted above, economic growth is considered most likely to come from B1 development in the borough. Also a focus on B1, with higher employment densities, is likely to lead to a higher number of new jobs created which is likely to have a preferential effect in terms of economic inclusion. Option 1 is therefore likely to lead to a significant positive effect in terms of this objective.	★ 1	2
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	Higher density employment results in more effective and efficient use of land with more jobs being provided from less space.	★ 1	2
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	B1 uses are less likely to cause noise disturbance compared to B2 and B8 uses.	★ 1	2
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u></p> <p>In an area that is constrained in terms of the availability of land for employment development and has high unemployment levels, intensifying the existing offer is an important priority to create more jobs for the growing population and to address historic local unemployment. Against this background, Option 1 is seen to perform well in terms of sustainability objectives, with significant positive effects predicted in terms of economic growth and economic inclusion. A risk is that if/when space for large floorplate uses is needed, there will not be the land available to accommodate these uses, but this is considered to be minor given the evidence suggesting economic growth is considered most likely to come from B1 development.</p>			

APPENDIX IV – EMPLOYMENT SITES (2)

Introduction

Chapter 13 (within ‘Part 2’, above) presents summary appraisal findings in relation to the following alternatives for employment sites:

- Option 1** - Allow introduction of non-employment uses (as part of mixed use schemes) in certain designated employment locations, to cross-subsidise and enable new employment development to come forward
- Option 2** - Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Mixed use schemes (Option 1) ensure that sites are busy throughout the day, therefore reducing risk of crime / fear of crime. However, it is not clear that significant effects would result.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	A requirement to cross-subsidise employment development could make redevelopment less of an attractive option, meaning that it is less likely that housing would come forward. However, in practice it is not thought that this will be the case in Haringey. There is also an argument to suggest that, under Option 2 (no cross subsidy) it could be the case that existing employment sites are developed more intensively for residential uses, which might not be ideal from a ‘housing’ perspective if the buildings and locations are not ideal (e.g. because of layout, design or access to services/facilities).	N/a	N/a
Community Cohesion	It is not anticipated that the alternatives will have any differential impact on this topic. However it is noted that the design of any new mixed use development in an employment area would have to be carefully considered to ensure that a genuine and cohesive ‘community’ was created.	N/a	N/a
Accessibility	No notable implications.	N/a	N/a
Economic Growth	Cross subsidy (Option 1) is a means of ensuring that sites that already perform an employment function continue to do so, and it is likely that the nature of employment development that comes forward through cross-subsidy will be of a type (e.g. knowledge or creative industries) that is needed from an economic growth perspective. Significant positive effects are likely.	1	2
Skills and Training	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	Creating mixed use development promotes flexible working patterns and good physical accessibility to local jobs in the employment location and may help to cross subsidise employment uses that create jobs and opportunities for new businesses to establish. Regeneration of employment areas could have negative impacts on existing businesses if increases in average rents or changes in floorspace provision force them to relocate. However this should be mitigated by the requirement in Policy DM 48 for a proportion of the provided employment floorspace to be affordable workspace in perpetuity.	★ 1	2
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site is likely to mean that the employment use is office based, leading to fewer problems around noise and disturbance.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u></p> <p>Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.</p>			

APPENDIX V – TOWN CENTRE USES

Introduction

Chapter 14 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for town centre uses:

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

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

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	There is an issue in that a lack of active frontages can lead to increased fear of crime; however, it is not entirely clear which option would most likely lead to positive effects / would lead to greater positive effects.	★1	★1
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	No notable implications.	N/a	N/a
Community Cohesion	Protecting retail in town centres could help to sustain strong centres for the community, which helps to generate a greater sense of cultural identity and belonging. Conversely, setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the community benefits provided by town centres. On balance it is considered that there is insufficient evidence to judge the relative performance of Options A and B against this objective, therefore both options have been ranked equally.	★1	★1
Accessibility	No notable implications.	N/a	N/a
Economic Growth	Protecting A1 uses in town centres could help to sustain a vibrant local economy and local jobs. Conversely, setting thresholds for A1 could constrain the vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the economic growth of town centres. On balance it is considered that there is insufficient evidence to judge the relative performance of Option 1 and 2 against this objective, therefore both options have been ranked equally.	★1	★1
Skills and Training	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	<p>Protecting A1 uses in town centres could help to sustain a vibrant local economy and local jobs. Conversely, setting thresholds for A1 could constrain the vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the economic growth of town centres. A more permissive approach (Option 2) might create more opportunities for new local businesses to develop.</p> <p>On balance it is considered that there is insufficient evidence to judge the relative performance of Option 1 and 2 against this objective, therefore both options have been ranked equally.</p>	★ 1	★ 1
Town Centres	<p>It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the Borough to fulfil their role and function. Crouch End and Green lanes have the highest percentages of vacant town centre floor space, with 8.7% and 6.9% respectively. In one sense, Option 1 could improve this situation by giving priority for space in the town centres to be used for retail uses. However in the other sense, Option 1 could exacerbate the problem if retail cannot afford to set up in these town centres.</p> <p>Protecting retail in town centres could help to sustain strong and vital centres for the community. Conversely, setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2) by limiting the range of outlets that are permitted. If there is greater demand for non-A1 uses than some existing A-class uses, then the policy would act to constrain the vitality of town centres.</p> <p>On balance it is considered that there is insufficient evidence to judge the relative performance of Option 1 and 2 against this objective, therefore both options have been ranked equally.</p>	★ 1	★ 1
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
	<p><u>Summary</u></p> <p>The town centres in Haringey act as the focus for local convenience shopping and community facilities. Given this role, they will contribute to the vitality local communities, and also help to reduce car dependency. Protecting retail in town centres (Option 1) could help to sustain strong and vital centres in the long term; but on the other hand there are arguments to suggest that setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2). If there is greater demand for non-A1 uses than some existing A-class uses, then a restrictive policy would act to constrain the vitality of town centres, with knock-on effects. It is difficult to distinguish between the alternatives, given the changing role of town centres in society. However, it is noted that Haringey has commissioned an evidence base study which in essence says that, given the increasing population in Haringey and the likely increase in disposable income, it is likely that more retailing will be needed in the borough.</p>		

APPENDIX VI – NEGATIVE CLUSTERS: HOT FOOD TAKEAWAYS / BETTING SHOPS

Introduction

Chapter 15 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for negative clusters:

Option 1 - Proactively restrict negative clusters (e.g. hot food takeaways and betting shops)

Option 2 - No policy - applications assessed against other town centre use policies.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Negative clusters are more likely to attract crime and have an increased fear of crime associated with them. Restricting these negative clusters would help reduce the levels of crime and antisocial behaviour in the long term.	★1	2
Education	No notable implications.	N/a	N/a
Health	Hot Food / Fast Food Takeaways are often bad for people's health, and there is clear evidence that regular use consumption of fatty food can lead to poor health (e.g. cardiovascular disease, obesity). Therefore promoting the restriction of negative clusters can help reduce the amount of fast food takeaways and in the longer term can significantly contribute to healthier lifestyles of residents. Given the prevalence of obesity in Haringey, this would likely lead to a significant positive effect in terms of health.	★1	2
Housing	No notable implications.	N/a	N/a
Community Cohesion	Negative clusters of hot food takeaways and betting shops can often take the identity out of a community and detract from people visiting the area due to their impact on the character of an area. Option 1 would help promote a sense of cultural identity, belonging and well-being more than Option 2.	★1	2
Accessibility	No notable implications.	N/a	N/a
Economic Growth	There is the possibility that if negative clusters were restricted there would be a struggle to find alternative uses for the buildings. However if they were restricted this would create opportunities to diversify employment opportunities for the local area. Therefore it would be hard to say which option would be more positive for the economic growth of the area.	N/a	N/a
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	The restriction of negative clusters could give the opportunity for the encouragement of new businesses to the area which would diversify the employment in the area and give more opportunities for the local community.	★1	2

Topic	Discussion	Opt 1	Opt 2
Town Centres	The NPPF emphasises the need to support competitive town centres, and oppose schemes that will impact town centre viability. It calls for town centres to provide a diverse retail offer and to reflect local 'individuality'. CLG's (2012) report 'High streets at the heart of our communities' notes that local policies should look to reinforce local distinctiveness and community value of town centres, and develop their social function with a view to underpinning ongoing commercial viability. All of this indicates that promoting town centres that are diverse and beneficial for the community through the economy and society are more advantageous. This is achievable through buildings being used for positive uses, compared to the town centres being a hub for negative clusters. As a result Option 1 is more beneficial for town centres.	★ 1	2
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	Negative clusters of hot food takeaways and betting shops can often adversely affect the character of an area and the townscape. Option 1 would control clusters of such uses and help to prevent negative effects, providing greater policy protection than Option 2.	★ 1	2
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u></p> <p>Overall, in terms of sustainability objectives, Option 1 is clearly best performing. No draw-backs are highlighted by the appraisal. Restricting negative clusters of hot food takeaways and betting shops would likely lead to significant positive benefits in terms of 'health', given the assumption that there would be reduced consumption of fatty foods. There would also be benefits in terms of reduced crime and antisocial behaviour, improved townscape and improved vitality in town centres.</p>			

APPENDIX VII – TALL BUILDINGS.

Introduction

Chapter 16 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for tall buildings:

- Option 1** - Detailed policy for the siting and design of tall buildings, within identified locations, taking account of site specific circumstances and supported by Haringey's Urban Characterisation study.
- Option 2** - Less prescriptive constraints on tall buildings; relying on London Plan and Strategic Policies DPD.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	The Borough has population density of 86.2 persons per hectare, well above the London average (52.0). The Borough's population is set to increase by 31,234 over the period 2011-2021. The difference between Option 1 and Option 2 is Option 1 would limit tall building development to specific locations, whereas Option 2 can be seen to be a more relaxed approach. Option 2 could therefore be considered the preferred option in terms of delivery of a greater amount of housing.	2	★1
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	The Haringey 'Sustainable Community Strategy 2007-2016' looks to ensure that the Borough's communities have easier access to open spaces, facilities and shopping areas. Ensuring accessible local services in various buildings will lead to a better environment for all Communities. However Siting and Design of Tall Buildings is not likely to have any significant effect in terms of Accessibility	N/a	N/a
Economic Growth	The development of tall buildings could create additional space for business development and new employment opportunities. However indiscriminate development of tall buildings could put pressure on infrastructure including transport infrastructure, potentially undermining growth prospects. On balance it is considered that there is insufficient evidence to judge the relative performance of Option 1 and 2 against this objective, therefore both options have been ranked equally.	★1	★1
Skills and Training	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	Not having a Prescriptive Tall buildings Siting and Design constraint will allow more wide ranging development which in turn could give a much needed lift to areas in decline. However there is a need for town centres to retain local distinctiveness and community value. It is important to ensure that a balance would be able to be struck so as to ensure the scale of new retail, commercial, culture and leisure developments within town centres reflect the size, role and function of the centres.	★1	2
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	The Strategically Important Landmark Viewing Corridor contributes to the overall feel of the area. Any Tall building in this respect would impede on the "London Panorama." Proposed developments should fit within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. In this case applying constraints, including complying with CABI/English heritage guidance, would be the better option as it would have a more-beneficial preferential effect on protecting the borough's townscape and cultural heritage.	★1	2
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	Siting and Design of Tall Buildings is not likely to have any significant effect in terms of Soil and Land Quality. Using areas that have been previously developed will potentially have issues of contamination due to the Boroughs historic Industrial legacy. Designating areas like these for development would lead to an increased quality of townscape in an area and lead to a better quality for local communities.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	Siting and Design of Tall Buildings is not likely to have any significant effect in terms of Energy and Carbon. It is noted that tall buildings can have very high embodied energy/carbon and that the use of lifts to access floors can increase energy consumption; however tall buildings can be designed to be very energy efficient in operation (e.g. due to high densities involved).	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u> Option 1 is best performing in terms of all objectives, other than those relating to 'housing'. Option 1 would restrict tall buildings to particular areas, protecting the borough's townscape and cultural heritage, while still allowing tall buildings in some areas.</p>			

APPENDIX VIII – VIEWS AND VISTAS

Introduction

Chapter 17 (within ‘Part 2’, above) presents summary appraisal findings in relation to the following alternatives for views and vistas:

Option 1 - Policy to minimise disturbance of identified local views and vistas

Option 2 - Only protect London Plan strategic views.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	The protection of identified local views in addition to Local Plan strategic views could limit the options for housing development on some sites, therefore in terms of housing delivery Option 2 (protect London Plan strategic views only) would be the preferred approach as it constrains fewer sites.	2	★1
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	No notable implications.	N/a	N/a
Economic Growth	No notable implications.	N/a	N/a
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	View and vistas contribute to legibility and wayfinding within town centres.	★1	2
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	Protection of identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough’s townscape and cultural heritage resources, as compared to only protecting London Plan strategic views. Therefore Option 1 is preferred as it will have the greater positive impact on this objective. Option 1 goes over and above the London Plan requirements and therefore would lead to a significant positive effect in terms of this objective.	★1	2
Open Space	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u></p> <p>A policy to minimise disturbance to identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough’s townscape and cultural heritage resources, as compared to only protecting London Plan strategic views (Option 2). Significant positive effects are predicted in terms of townscape/heritage objectives. However, greater protection of identified local views in addition to Local Plan strategic views could place constraints on housing delivery in some areas.</p>			

APPENDIX IX – HERITAGE AND CONSERVATION.

Introduction

Chapter 18 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for heritage and conservation:

Option 1 - Proactive approach to designated and non-designated assets, with applicants required to demonstrate options for adaptive re-use

Option 2 - Do not apply policy to non-designated heritage assets.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	It is not possible to differentiate between the alternatives, although it is noted that the preservation of heritage assets can help to create a sense of place and thus improve people's sense of wellbeing.	N/a	N/a
Housing	The protection of non-designated heritage assets (Option 1) could place greater restrictions on the development of some sites, including housing developments. However this effect is anticipated to be limited.	2	★1
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	No notable implications.	N/a	N/a
Economic Growth	The protection of non-designated heritage assets (Option 1) could place greater restrictions on the development of some sites, including sites that could contribute to economic growth. However this effect is anticipated to be limited.	2	★1
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Townscape and Cultural Heritage	Option 1 would seek to protect both designated and non-designated heritage assets. Designated assets appear sufficiently protected through national policy, though some buildings are at risk, but the policy would increase protection of non-designated assets, thereby helping to preserve and enhance the value that they contribute to Haringey. Expanding the policy focus to include non-designated assets (Option 1) is likely to result in significant positive effects in terms of townscape and cultural heritage, compared to Option 2 which retains a focus solely on designated assets.	★ 1	2
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u></p> <p>A policy focus on non-designated assets in addition to designated assets (Option 1) is likely to result in significant positive effects in terms townscape and cultural heritage objectives, and it is not clear that there are any major draw-backs to this approach. There might be some negative implications for housing and economic growth, but (thinking long-term) heritage assets can help enable regeneration and create a sense of place (with positive implications for economy and community objectives).</p>			

APPENDIX X – CAR FREE OR CAR CAPPED DEVELOPMENTS

Introduction

Chapter 19 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for 'car free or car capped developments':

Option 1 - Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned

Option 2 - Parking required, in accordance with the London Plan parking standards.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	Creating residential developments with limited or no on-site parking could increase the usage of forms of sustainable transport, including active travel modes such as walking and cycling. This should improve health outcomes over the medium to long term through increased physical activity.	★1	2
Housing	No notable implications.	N/a	N/a
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	Limiting parking could reduce accessibility to services and amenities, however if it is assumed that Option 1 would only be applied to sites with high PTAL levels then this should not occur, therefore it is considered that Car Free or Car Capped Developments is not likely to have any significant effect in terms of accessibility.	N/a	N/a
Economic Growth	No notable implications.	N/a	N/a
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	The Borough suffers poor air quality primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park. There are concerns that ongoing development might significantly increase emissions. Minimising per capita emissions from transport by encouraging use of more sustainable transport modes would improve air quality in an area.	★ 1	2
Noise	No notable implications.	N/a	N/a
Energy and Carbon	If, under Option 1, the policy is robustly applied in the planning process (and assuming that there are significant opportunities to reduce car use) then it could result in a positive effect in terms of reducing transport-related energy consumption and per capita greenhouse gas emissions.	★ 1	2
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	Car Capped developments (Option 1) would encourage use of 'sustainable' forms of transport (walking, cycling and public transport) instead of the car. The reason for taking this approach primarily relates to infrastructure capacity (as there are concerns that the cumulative effect of numerous developments might overwhelm road capacity, which is already set to be stretched).	★ 1	2
<p><u>Summary</u></p> <p>Option 1 (limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone in place or planned) is likely to have greater positive effects in terms of encouraging sustainable transport (significant positive effect), health, air quality and climate change mitigation objectives. With large scale development planned within Haringey, an integrated approach to land use and transport planning that minimises the need to travel and encourages the most sustainable travel choices could have a notable positive effect on reducing transport-related greenhouse gas emissions per capita.</p>			

APPENDIX XI – ALLOWABLE SOLUTIONS / CARBON OFFSETTING

Introduction

Chapter 20 (within ‘Part 2’, above) presents summary appraisal findings in relation to the following alternatives for allowable solutions / carbon offsetting:

Option 1 - Allowable solutions (including local carbon offsetting fund) to better enable developers to meet carbon targets

Option 2 - No allowable solutions (CO₂ reductions must be met on site); wait on further Government guidance,

The aim of this chapter is to present *detailed* appraisal findings.

Methodology

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. Housing quality/condition is an important wider determinant of health.	★1	2
Housing	A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme.	★1	2
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	No notable implications.	N/a	N/a
Economic Growth	No notable implications.	N/a	N/a
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. This would reduce the need for heating and thus the emissions to air from boilers.		2
Noise	No notable implications.	N/a	N/a
Energy and Carbon	The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008. Plan-making should support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment. A local carbon offsetting fund could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, reducing carbon emissions. However national government may rule out such an approach in favour of a national offsetting scheme.		2
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><u>Summary</u></p> <p>A local carbon offsetting fund (Option 1) could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact on housing could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme. Given that housing quality/condition and issues around fuel poverty are important determinants of health, Option 1 could also improve health outcomes and reduce health inequalities.</p>			

APPENDIX XII – COMMUNITY INFRASTRUCTURE.

Introduction

Chapter 21 (within 'Part 2', above) presents summary appraisal findings in relation to the following alternatives for community infrastructure:

Option 1 - Policy to set location requirements for new / extended community facilities

Option 2 - No specific location requirements - accept facilities wherever proposed.

The aim of this chapter is to present *detailed* appraisal findings.

Methodology as

See discussion in Appendix I.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Provision of community facilities can help to reduce crime levels, particularly youth offending and anti-social behaviour, through providing opportunities for recreation and socialising. Option 1 would target community infrastructure where it is needed the most (where there are deficiencies in accessibility) which would likely have a more beneficial effect; although it is assumed that both Options would lead to a similar quantum of infrastructure being delivered in order to support growth.	★ 1	2
Education	Education facilities are an important type of community infrastructure and ensuring that schools are accessible can have a positive effect on educational attainment. Option 1 would target community infrastructure where it is needed the most (where there are deficiencies in accessibility) which would likely have a more beneficial effect; although it is assumed that both Options would lead to a similar quantum of infrastructure being delivered in order to support growth.	★ 1	2
Health	GP facilities and open space are types of community infrastructure that affect health and wellbeing and accessibility to these types of infrastructure is important to maintaining good health. As above, Option 1 would focus infrastructure where it is needed (in areas of growth of areas of deficiency) and therefore can be said to be the preferred option.	★ 1	2
Housing	No notable implications.	N/a	N/a
Community Cohesion	Provision of accessible and high quality community facilities can enhance community cohesion through enabling social mixing amongst local residents. Investment in new and improved facilities in targeted locations (Option 1) is likely to have a more beneficial effect.	★ 1	2
Accessibility	If it can be assumed that one of the locational requirements under Option 1 is that the new/expanded infrastructure is in an accessible location, then it can be assumed that Option 1 would lead to provision of community infrastructure in more accessible locations than Option 2 which could come forward in myriad locations.	★ 1	2
Economic Growth	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Skills and Training	The Haringey 'Sustainable Community Strategy 2007-2016' sets an objective to extend training opportunities for people to improve their skills, especially in order to have access to jobs in key areas of commerce and growth. Community infrastructure can play a part in increasing educational attainment, training, workforce skills and qualifications. If under Option 1 such facilities are targeted in areas of low skills and high unemployment, Option 1 would likely lead to a more beneficial effect than Option 2.		2
Economic Inclusion	Putting new community infrastructure in the most impoverished areas of Haringey would increase attractiveness of neighbourhoods as places to live and work, and the ability of residents to take advantage of new employment opportunities. In this case Option 1 would be preferred as it would enable the developments to be put in areas of most need.		2
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	Open space is a type of community infrastructure. Certain parts of the borough are deficient in terms of access to open space. Targeted investment in new, expanded or enhanced open spaces in areas of deficiency could have a positive effect should it improve accessibility to open space.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	If it can be assumed that one of the locational requirements under Option 1 is that the new/expanded infrastructure is in an accessible location, then it can be assumed that Option 1 would lead to provision of community infrastructure in more accessible locations than Option 2 which could come forward in myriad locations.		2
<p><u>Summary</u></p> <p>Community Infrastructure assets can help to enable regeneration and create a sense of place and improve people's quality of life. Haringey has existing pockets of deprivation and also areas of deficiency for different types of community infrastructure, as well as new growth in the pipeline that will need supporting infrastructure. Therefore, by locating new and enhanced infrastructure in specific locations, Option 1 is more likely to benefit existing and future residents than Option 2 which could take place anywhere in the borough. No draw-backs to Option 1 have been identified.</p>			