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Sustainability Appraisal (SA) of the Site Allocations DPD

SA Report

Published alongside the pre-submission version of the plan

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Site Allocations Development Plan Document (DPD). Once adopted, the plan will present a policy framework for those sites that will accommodate the majority of development in the Borough over the period 2011-2026.
- 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 and Programmes 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 (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.⁴ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 More specifically, the SA Report must answer the following **three questions**:
1. What has Plan-making / SA involved **up to this point**?
 - Including with regards to consideration of 'reasonable alternatives'.
 2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
 3. What happens **next**?
 - What steps will be taken to finalise the plan?
 - What measures are proposed to monitor plan implementation?
- 2.1.4 **Table 2.1** explains more about the regulatory basis for answering these questions.

2.2 This SA Report

- 2.2.1 This document is the SA Report for the Site Allocations DPD, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.
- 2.2.2 Before answering Question 1, however, there is a need to set the scene further within this 'Introduction' by answering two other questions.

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 Chapter 4.

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

⁴ Regulation 12(2)

Table 2.1: Questions answered by this SA Report, in-line with Regulatory⁵ requirements

PRIMARY QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What has plan-making / SEA involved up to this point? [See Part 1 , below]		<ul style="list-style-type: none"> • Outline reasons for selecting the alternatives dealt with (and thus an explanation of the ‘reasonableness’ of the approach) • The likely significant effects associated with alternatives • Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan
What are the SEA findings at this current stage? [See Part 2 , below]		<ul style="list-style-type: none"> • The likely significant effects associated with the draft plan • The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan
What happens next? [See Part 3 , below]		<ul style="list-style-type: none"> • A description of the monitoring measures envisaged
OTHER QUESTIONS ANSWERED		IN LINE WITH REGULATIONS... THE SA REPORT MUST INCLUDE...
What’s the plan seeking to achieve?		<ul style="list-style-type: none"> • An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes
What’s the scope of the SEA?	What’s the sustainability ‘context’?	<ul style="list-style-type: none"> • Relevant environmental protection objectives, established at international or national level • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What’s the sustainability ‘baseline’?	<ul style="list-style-type: none"> • Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan • The environmental characteristics of areas likely to be significantly affected • Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance
	What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> • Key environmental problems / issues and objectives that should be a focus of (i.e. provide a ‘framework’ for) assessment

N.B. The right-hand column of Table 2.1 does not quote directly from Schedule II of the Regulations. Rather, it reflects a degree of interpretation. This interpretation is explained in **Appendix I** of this report.

Also, **Appendix II** presents supplementary information (in the form of a checklist) to further explain how/where regulatory requirements are met within this report.

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 The Site Allocations DPD, once adopted, will set out the key strategic development sites which will assist the Borough in delivering the spatial strategy set out in the Strategic Policies Local Plan.

3.1.2 Larger, more strategic sites will benefit from having a Site Allocation, to ensure that:

- The appropriate level of development occurs on the site;
- A positive approach to design is taken;
- Infrastructure is provided in a timely manner to serve the growing local community.

3.1.3 Once adopted, the Site Allocations DPD will enable the Council to determine planning applications and make interventions on sites in line with the allocations. If these sites are not safeguarded for specific uses, the borough would be at risk of not being able to facilitate and deliver mixed and balanced, sustainable communities, and meet its identified housing and employment targets.

3.1.4 The main 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 London Plan (2015), which establishes housing and employment targets for Haringey; and the adopted Strategic Policies DPD (2013). 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.

3.2 What's the plan not seeking to achieve?

3.2.1 The plan is not seeking to allocate all of the sites to be developed over the plan period. It only focuses on those sites that are most strategic and would benefit from having an allocation, in order to ensure that the Council meets its housing and employment targets as set out in the Strategic Policies. Many developments will take place which can be satisfactorily managed using policies included in the Strategic Policies DPD and Development Management Policies DPD.

3.2.2 Furthermore, even the allocation of sites should be considered a strategic undertaking, i.e. a process that omits consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

- 4.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of (and provide a broad methodological framework for) SA. Further information on the scope of the SA – i.e. a more detailed review of sustainability issues/objectives as highlighted through a review of the sustainability 'context' and 'baseline' - is presented in within **Appendix II**.

Consultation on the scope

- 4.1.2 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.⁶
- 4.1.3 As such, an SA Scoping Report⁷ was published for consultation in January 2014. 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.

4.2 Key issues / objectives

- 4.2.1 The following table presents the sustainability objectives established through SA scoping, i.e. in-light of context/baseline review and consultation. Taken together, these objectives provide a methodological 'framework' for appraisal.

⁶ 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.'*

⁷ The SA Scoping Report is available at: http://www.haringey.gov.uk/index/housing_and_planning/planning-mainpage/policy_and_projects/local_development_framework/site-allocations-dpd.htm

Table 4.1: 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?
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?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
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?
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?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
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?

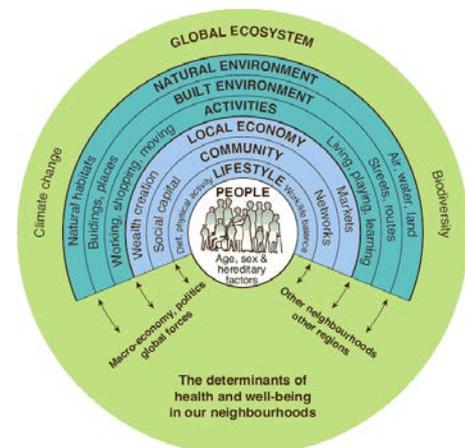
4.1 A note on ‘equalities’ and ‘health’ considerations

4.1.1 Equality and health considerations 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). **Appendix IV** signposts to areas within this report where EqIA and HIA has ‘fed-in’.

Box 4.1: EqIA and HIA

The Council has 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**, 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)

PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

5 INTRODUCTION (TO PART 1)

- 5.1.1 This 'Part' of the report explains how SA has informed and helped to shape development of the Strategic Policies Partial Review. It is here that information is presented on the appraisal of **'reasonable alternatives'**.
- 5.1.2 Specifically, this chapter is structured as follows:
- Chapter 6 - Introduces the alternatives that have been a focus of appraisal (with a view to demonstrating the 'reasonableness' of the approach taken)
 - Chapter 7 - Presents appraisal findings in relation to reasonable alternatives
 - Chapter 8 - Explains the Council's reasons for selecting the preferred approach – as set out in the proposed submission plan - in-light of alternatives appraisal.
- 5.1.3 Providing information on reasonable alternatives, and explaining how consideration of reasonable alternatives has fed into plan-making, is important from an SEA Regulations compliance perspective.⁸
- [Aside from alternatives appraisal, how else has SA influenced plan-making?](#)
- 5.1.4 In addition to alternatives appraisal, development of the draft (pre-submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the draft plan consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the draft plan as it currently stands (specifically, boxes are embedded within the appraisal text to explain the influence of past appraisal).

⁸ In-line with the SEA Directive / Regulations the SA Report must present an appraisal of the draft plan and 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with'.

6 REASONS FOR SELECTING THE ALTERNATIVES CONSIDERED

6.1 Introduction

- 6.1.1 The aim of this chapter is to explain the sets of alternatives that have been a focus of appraisal, with a view to demonstrating the 'reasonableness' of the approach taken.
- 6.1.2 Alternatives were selected for appraisal in 2015, but in order to set the context for this work there is firstly a need to explain work undertaken by the Council in 2013/14.

6.2 Background to the selection of alternatives (work undertaken in 2013/2014)

- 6.2.1 The Council's preferred *broad* approach to site allocation emerged in 2013 / 2014. Initial work was undertaken in 2013 in-light of the housing need indicated by the 2011 Census, and then subsequent work was undertaken in 2014 in-light of updated understanding of housing and employment growth requirements.
- 6.2.2 Work undertaken in 2013/14 is explained below. Specifically, there is an explanation of -
- 1) Reasons for selecting the preferred site package; and
 - 2) Reasons for selecting preferred uses / policy approaches for each site.

Establishing the preferred site package

- 6.2.3 The preferred site package was established subsequent to a multi-stage process which involved:
- Gathering a long list of all potentially available sites in the borough;
 - A long list of site options was established in-light of a 'Call for Sites' exercise (2013); and a Strategic Housing Land Availability Assessment (SHLAA) process undertaken by the London Borough of Haringey (LBH) and the Greater London Authority (GLA). This was supplemented with a list of sites otherwise 'in the system', e.g. where pre-application discussions had taken place.
 - Drawing on sources of technical evidence - such as the Strategic Housing Market Assessment, Employment Land Review, existing Development Frameworks, Viability Study, SFRA, and Open Space Assessment – to establish site specific issues.
 - Initial analysis and workshops to **screen out sites** with 'showstopper' constraints;
 - Factors related to community considerations (school site, transport asset site, existing infrastructure site, employment considerations (designated employment land, i.e. 'SIL'), environmental considerations (e.g. Green Belt, Metropolitan Open Land, Lee Valley Regional Park, Site of Importance for Nature Conservation, Allotments, Flood Zone 3a/3b) and other cumulative considerations that would affect deliverability (e.g. limited building heights, strategic views, listed buildings, Conservation Area).
- 6.2.4 There was **limited potential to screen-out sites** given the need to meet housing and employment targets, and the broad spatial strategy that is established through the adopted Strategic Policies DPD (2013). With regards to housing and employment targets, the London Plan (2011) housing target between 2011 and 2015 was 820 net dwellings per annum; however in-light of the published Further Alterations to the London Plan (FALP, March 2015) the target will be 1,502 dwellings per annum. Over the plan period (2011-2026) this creates an overall strategic delivery target of 19,802 net additional dwellings in Haringey. The Tottenham AAP will accommodate a minimum of 10,000 of these dwellings and so there is a need to deliver the remaining dwellings across the rest of the borough, particularly in identified Growth Areas and Areas of Change. The FALP also sets a target for a significant increase in the number of jobs in Haringey from 73,000 jobs in 2011 to 85,000 jobs in 2026. This will necessitate a move towards employment types that require less floorspace per employee.

Establishing preferred uses / policy approaches for each site

- 6.2.5 The Council went through a systematic process of defining and applying a set of ‘rules’ with a view to establishing the uses that might be suitable at each of the preferred sites. The following rules were applied:
- A site is potentially suitable for **residential** development *unless* it is a Designated Employment Area (DEA = LSIS, EL or SIL)
 - A site is potentially suitable for **employment** development where it is a DEA, in a town centre, or where PTAL is good (4 or above)
 - A site is potentially suitable for **town centre** uses if it is within a town centre
- 6.2.6 Applying these rules led to the identification of potentially suitable uses for each site.⁹ Subsequently, a preferred policy approach was developed, factoring-in consultation findings from the previous Regulation 18 consultation (January 2014), and also the findings of a further series of workshops (with each dedicated to a sub-area within the Borough).

6.3 Selecting alternatives (2015)

6.3.1 This section first gives consideration to the process of developing reasonable alternatives in early 2015, and then gives consideration to the process of refining understanding of the reasonable alternatives in late 2015.

Early 2015

- 6.3.2 A meeting was held between Council officers and the SA consultants in January 2015, with a view to identifying instances where the preferred approach to particular sites is more difficult to explain / justify. The intention was to identify a number of such sites, and then establish alternative uses (which could then be the focus of appraisal).
- 6.3.3 However, at the meeting it was recognised that, rather than appraising alternatives in relation to specific sites, a more appropriate approach is to appraise alternatives in relation to broad issues – see Table 6.1.

Table 6.1: Sets of alternatives established in January 2015

Issue	Option 1	Option 2
Office uses in Wood Green	Reduction in office uses, despite high accessibility (PTAL)	Promotion of office uses prevalent, commensurate with high PTAL
Non-designated employment sites	Generally maintain employment function where PTAL is high	Generally maintain employment function where PTAL is moderate or high
Haringey Warehouse District	Allow a mix of uses including residential	Maintain as employment, reflecting employment designation
Open space	Do not allocate sites for purely open space	Seek to allocate sites for purely open space

⁹ The February 2015 Interim SA Report explained this step of ‘considering alternative uses for each site’ in greater detail. It was helpful to consider alternatives in early 2015; however, things have moved on since that time (including because at that time the possibility of assigning open space or community infrastructure uses to allocations was a consideration, whilst the view now is that this should not necessarily be the role of the Site Allocations DPD, i.e. it is more appropriate to rely on DM policies and the Infrastructure Delivery Plan, where the need for site specific infrastructure is not clearly needed to support delivery of the spatial strategy).

6.3.4 Other broad issues were discussed at the meeting, on the basis that there could be merit to giving systematic consideration to alternatives, before being 'screened-out' as not ('reasonably') necessitating alternatives appraisal. The following issues were screened-out:

- Community infrastructure uses
 - Consideration was given to 'rules' that might be applied with a view to identifying alternative approaches that might be taken to community infrastructure delivery; however, on balance it was determined inappropriate to give detailed consideration to community infrastructure at this stage. The preferred approach is to avoid being overly prescriptive, on the basis that an Infrastructure Delivery Plan update is in development. It is also the case that it is appropriate to firstly determine / consult on a preferred spatial approach to development, and then subsequently determine an approach to community infrastructure delivery to appropriately support that development. It was also recognised that the emerging Development Management Policies DPD could help manage requirements for infrastructure on new development, having regard to the IDP.
 - Where there was a clear need or opportunities for site specific infrastructure to support delivery of the spatial strategy, it was considered reasonable to set relevant requirements in the Plan's site policies. Regulation 18 consultation responses were particularly helpful in flagging key opportunities for delivery of infrastructure, such as for sustainable transport and flood risk management.
- Town centre uses
 - The preferred approach is to ensure that Town Centre uses are directed only to the designated town centres, and an alternative approach could potentially involve introducing a degree of flexibility. On balance, however, it was determined that the alternative approach does not necessitate appraisal at this stage.
- Town centre boundaries
 - The Strategic Policies Local Plan aims to protect and enhance Haringey's town centre hierarchy, including by positively planning for the future distribution of additional retail capacity. The boundaries of town centres are an integral part of town centre management and therefore merit consideration in plan preparation. This is particularly in view of local evidence which suggests a need to accommodate additional retail capacity to meet the needs of Haringey's future population over the plan period. In order to accommodate additional retail capacity, there is an option to deliver this *within* the existing hierarchy and established town centre boundaries. However, the preferred approach is to accommodate planned future retail capacity through an *extension* to the town centre boundaries. This is considered a more flexible option for delivering capacity, taking into account committed growth and expected population increases, as well as future transport improvements.
- Development within Conservation Areas
 - The preferred approach is to allocate some sites within designated Conservation Areas, and an alternative approach could potentially involve ruling out allocation within Conservation Areas. On balance, however, it was determined that the alternative approach does not necessitate appraisal at this stage. The matter of development within Conservation Areas is more appropriately addressed through the setting of criteria-based policy within the Development Management Plan.

Late 2015

- 6.3.5 Whilst the alternatives discussed above were the focus of appraisal and consultation in early 2015, the view of the Council now is that it is appropriate to refine understanding somewhat. Specifically, having regard to public consultation feedback and other technical evidence, the view of the Council has shifted in relation to 'Non-designated employment sites', where there is a greater emphasis on retaining employment generating land and floorspace. The view of the Council is that the decision on whether or not to redevelop non-designated employment locations for residential uses should generally be taken on a site-by-site basis, recognising that an overarching objective is to protect against the loss of employment land in; including for non-designated sites. This can be appropriately managed through the Development Management Policies DPD.
- 6.3.6 This would seem a reasonable approach to take, although it is noted that the appraisal of alternatives from February 2015 did find that a clear strategy of considering residential uses at non-designated employment sites in all cases except where PTAL is high performs well in terms of a range of sustainability objectives, with the exception of 'economic inclusion' objectives.
- 6.3.7 Table 6.2 lists the refined reasonable alternatives.

Table 6.2: The reasonable alternatives

Issue	Option 1 (the preferred option)	Option 2
Office uses in Wood Green	Reduction in office uses, despite high accessibility (PTAL)	Promotion of office uses prevalent, commensurate with high PTAL
Haringey Warehouse District	Allow a mix of uses including residential	Maintain as employment, reflecting employment designation
Open space	Do not allocate sites for purely open space	Seek to allocate sites for purely open space

7 ALTERNATIVES APPRAISAL FINDINGS

7.1 Introduction

- 7.1.1 The aim of this chapter is to present alternatives appraisal findings in relation to the four sets of alternatives introduced above (in Chapter 6). Summary appraisal findings are presented in this Chapter, with detailed appraisal findings presented in the **Appendices V - VIII**.
- 7.1.2 The methodology is explained 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 option in terms of 'significant effects (using **red** / **green** shading) and also rank the alternatives in order of preference. Also, '=' is used to denote instances where the alternatives perform roughly on a par.

7.2 Office uses in Wood Green

7.2.1 The table below presents summary appraisal findings in relation to the following alternatives:

- **Option 1** – Managed reduction in office uses, despite high accessibility (PTAL)
- **Option 2** – Promotion of office uses prevalent, commensurate with high PTAL

N.B. These are the same alternatives that were considered within the February 2015 Interim SA Report, and it is also the case that alternatives appraisal findings are largely unchanged.

Table 7.1: Summary appraisal findings: Office uses in Wood Green

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Housing	★1	2
Community Cohesion	★1	2
Accessibility	★1	2
Economic Growth	★1	2
Economic Inclusion	=	
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
Sustainable Transport	2	★1

Option 1 (Managed reduction in office uses) performs best in terms of a range of sustainability objectives, stemming from the suggestion that this approach will support a targeted approach to regeneration in Wood Green, leading to a diversification of uses and a situation whereby the town centre is vibrant and has a clear role to play sub-regionally. It is not thought that a decision to reduce office space in Wood Green will have negative implications from an economic growth perspective, given that there are a number of other areas locally where demand for offices is high, and the effect of regeneration in Wood Green should be to enhance the image of Haringey in general as a place to do business and invest. The draw-back to Option 1 relates to ‘sustainable transport’ objectives; however, there are other locations with high PTAL that are set to be a focus of office development.

7.3 Haringey Warehouse District

7.3.1 The table below presents summary appraisal findings in relation to the following alternatives:

- **Option 1** – Allow a mix of uses including residential
- **Option 2** – Maintain as employment, reflecting employment designation

N.B. These are the same alternatives that were considered within the February 2015 Interim SA Report, and it is also the case that alternatives appraisal findings are largely unchanged.

Table 7.2: Summary appraisal findings: Haringey Warehouse District

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Health	★1	2
Housing	★1	2
Community Cohesion	★1	2
Economic Growth	★1	2
Skills and Training	★1	2
Economic Inclusion	?	?
Sustainable Transport	2	★1

Option 1 (Allow a mix of uses including residential, despite employment designation) is likely to lead to widespread benefits given existing issues around unauthorised warehouse living (not least around poor living environments) and the fact that supporting the creative sector is an important economic objective for Haringey. There are potentially some draw-backs – including those that relate to the loss of floorspace for traditional industries – but it is anticipated that policy measures can be put in place to mitigate effects.

7.4 Open space

7.4.1 The table below presents summary appraisal findings in relation to the following alternatives:

- Option 1 – Do not allocate sites for purely open space (focusing instead on quality/access)
- Option 2 – Seek to allocate sites for purely open space

N.B. These are the same alternatives that were considered within the February 2015 Interim SA Report, and it is also the case that alternatives appraisal findings are largely unchanged.

Table 7.3: Summary appraisal findings: Open space

Relevant sustainability topics	Option 1	Option 2
Crime	★ 1	2
Health	=	
Housing	★ 1	2
Accessibility	★ 1	2
Economic Growth	★ 1	2
Biodiversity	=	
Townscape and Cultural Heritage	=	
Open Space	=	
Water Resources	★ 1	2
Flood Risk and Climate Change	★ 1	2
Air Quality	=	
Noise	=	
Sustainable Transport	★ 1	2

There is difficulty in increasing the quantity of public open space in Haringey, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. Benefits of a Green Grid approach will be wide-spread, and hence 'significant positive effects' are predicted under a number of topic headings, most notably 'transport' and 'accessibility'.

8 REASONS FOR SELECTING THE PREFERRED APPROACH

8.1 Introduction

- 8.1.1 The aim of this chapter is to explain the Council's reasons for selecting the preferred approach subsequent to and in-light of alternatives appraisal. In other words, the aim of this chapter is to explain why the preferred strategy (as presented within the current pre-submission plan) is 'justified', i.e. the most appropriate strategy in-light of reasonable alternatives.

8.2 The Council's reasons for selecting the preferred approach

Office uses in Wood Green

- 8.2.1 The Further Alterations to the London Plan downgraded Wood Green's status as a preferred office location. While the Council is keen to maximise employment opportunities in the borough, and in particular within Wood Green and Tottenham, both the ELR and workspace viability study show that Wood Green faces challenges from cheaper stock outside of London and preferential locations in central London. It is therefore not deliverable approach to plan for significant large-scale office in this area, rather small scale and flexible workspace, or public sector occupants should be sought. Either way, the current stock is not of a high quality, and regeneration is a suitable approach to attracting investment to the centre. In addition, there is a risk that Permitted Development Rights allowing conversion from office to residential uses would threaten a strategic approach reliant on office development.

Haringey Warehouse District

- 8.2.2 The Council is committed to addressing the issue of warehouse occupation in parts of the south of the borough. As with non-designated employment sites above, the building stock in these areas is not always suitable for knowledge-based industries. Consultation with commercial agents in the area shows that there is interest from occupants to move to this area, which can be attributed to the improving reputation of the area being brought about by the warehouse occupants. The challenge now lies in harnessing this reputational uplift, and translating it into jobs. Therefore the Council is proposing a policy position that creates masterplan-led development which creates new employment floorspace, while creating spaces that the existing residential community wish to remain in and which would appeal to other potential occupiers.

Open space

- 8.2.3 Areas of the borough are deficient in open space. Competing against this are significant jobs and homes targets, which make the allocation of significant new open spaces very challenging. It is therefore the Council's aim that existing network of open spaces should be enhanced, and linkages to them improved, so that the borough's growing population can better access and utilise the existing open space assets within the borough.

PART 2: WHAT ARE THE SA FINDINGS AT THIS STAGE?

9 INTRODUCTION (TO PART 2)

9.1.1 This part of the report presents an appraisal of the Site Allocations DPD as it currently stands, i.e. as presented within the current ‘pre-submission’ document.

10 APPRAISAL OF THE DRAFT PLAN

10.1.1 This section first presents the appraisal methodology, before going on to present the appraisal of the draft plan under 21 ‘SA framework’ headings. Finally, this section presents appraisal conclusions at the current stage.

10.2 Methodology

10.2.1 The appraisal identifies and evaluates ‘likely significant effects’ of the preferred approach – i.e. the proposed Partial Review - on the baseline, drawing on the sustainability topics and objectives identified through scoping as a methodological framework. To reiterate, the sustainability topics considered in turn below are as follows:

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

10.2.2 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.

10.2.3 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.

10.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹⁰ 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.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

10.3 Crime

- 10.3.1 The plan is set to make **better use of under-used sites**, and in this way it will lead to positive effects in terms of crime and fear of crime. It is notable that the plan will bring a number of employment sites into more intensive uses. Increased passive surveillance could help to reduce localised crime.
- 10.3.2 Site Allocations for two sites directly reference the need for **passive surveillance**:
- SA 17: North of Hornsey Rail Depot (Wood Green) - *“Buildings along Hampden Road should create an appropriate street frontage, providing passive surveillance for users of Hornsey station.”*
 - SA 34: Overbury & Eade Rds (South of the borough) – *“Create active frontages to ensure passive surveillance.”*
- 10.3.3 Others that could potentially benefit from specific wording in relation to crime include:
- SA28: St Ann’s Hospital (South of the borough) – where it is anticipated that a route through the site will serve to link adjacent areas.
 - SA61: Barber Wilson (East of the borough) – where the aim is for infill development to facilitate an improved green grid link between Wood Green and Tottenham through Lordship Rec (with possible deculverting of the Moselle river).
- 10.3.4 Policy for several other sites references measures that could have a more indirect benefit in terms of crime / fear of crime. For example:
- SA 33: Vale/Eade Rd (South of the borough) – *“The new link should provide a straight, secure, pedestrian and cycling route.”*
 - SA 36: Finsbury Park Bowling Alley (South of the borough) – *“The entrance to the park from Station Place will be enhanced, with a clear, visible, open pedestrian and cycling route provided.”*
 - SA 38: 460-470 Archway Rd (Highgate) - *“The opportunity for provision of a new entrance to Highgate Wood should be explored...”*
- 10.3.5 There is potentially some degree of ‘trade-off’ between facilitating access through support for **new pedestrian and cycle routes**, and wishing to minimise crime / fear of crime. A strategic approach to access enhancements should help to ensure that routes are well used, and setting DM policy through the Site Allocations DPD should help to ensure that new routes only come forward where they are well designed (including to ensure good surveillance); however, this is an issue that should be a focus of further consideration (and potentially monitoring post plan adoption). It is noted that street lighting is a matter requiring ongoing investment in the emerging update to the Infrastructure Delivery Plan.
- 10.3.6 In **conclusion**, the proposed approach would likely lead to **significant positive effects** on the baseline, although there will further opportunities to design-out crime beyond those discussed above. This is a matter that should be the focus of plan-making, and of course will also need to be a focus of detailed investigations at the planning applications stage.

10.4 Education

- 10.4.1 Using the latest available data the Council will look to respond to school place projections as necessary, and also respond to any major residential development that is likely to impact upon demand for school places.¹¹ A response will be necessary in the designated Growth Areas (Tottenham Hale, North Tottenham and Wood Green); and where need for additional capacity is identified, this might be delivered in one of three ways: bulge classes (not sustainable for long term increased provision), expansions and new (free) schools as a part of major sites.
- 10.4.2 In terms of school capacity, the Site Allocations DPD need not allocate some land for additional provision (although an allocation is made through the Tottenham AAP). The February 2015 consultation document proposed the allocation of land for the expansion of St James C of E Primary, in order to address a possible shortfall in primary school places in Muswell Hill/north Bounds Green; however, due to updated deliverability and school need information, the school proportion of this allocation has been deleted. The Council states that: *“The decision not to proceed with consultation on the expansion of one or more Muswell Hill schools is based on projected overall local sufficiency of places until 2024 and accords with the agreed place planning principle of the need to meet (but not to exceed) the demand for school places in the local area... The Council has a duty to ensure sufficiency of primary and secondary school places for children of compulsory school are available for their area. Feasibility work was agreed on an evidence base of projections that showed unmet demand in the coming years. Current projections now show overall sufficiency of places across the borough up to 2024, although with an acknowledgement that there is greater surplus in some areas, and that projections show we will need to increase capacity in Tottenham and the Wood Green borders from 2020.”* It is, however, noted that the adjacent allocation at SA 51: Cranwood Care Home references the need to design the scheme (residential) in the knowledge that expansion of the adjacent school may prove necessary.
- 10.4.3 It is important to emphasise that the **Infrastructure Delivery Plan (IDP)** update will assist in setting out an assessment of future need over the plan period, and once this assessment is in place detailed measures will be considered. Also, the anticipated need in Wood Green will be addressed in the forthcoming Wood Green AAP.
- 10.4.4 Finally, it is important to reference SA 41: Highgate School. The proposal is for: *“Exploration of how school facilities can be enhanced while simultaneously benefitting local communities including potentially increasing accessibility through the site.”* A Supplementary Planning Document (SPD) will be prepared to guide development on this site.
- 10.4.5 In **conclusion**, it seems appropriate that the Site Allocations DPD need not have a major focus on education provision, but there will be increased clarity once the IDP update is completed.

10.5 Health

- 10.5.1 It is clear that facilitating **walking/cycling** and access to green / **open space** is a major ‘driver’ of the plan. Policy will be put in place to ensure that opportunities are realised as far as possible. Some site allocations set out to create connections, whilst others set out to enhance adjacent elements of the existing ‘network’. This matter is considered in detail below under the headings of ‘Open space’ and ‘Sustainable transport’.
- 10.5.2 Access to **health facilities** is another important issue. Two site allocations propose new health facilities in the borough: at Wood Green Library, and the Hawes and Curtis site on Green Lanes. This is in response to information received from NHS England regarding likely unmet demand in these areas. It is considered that when delivered, these sites will acceptably meet need for health premises in the borough. The **Infrastructure Delivery Plan (IDP)** update will set out a full assessment of future need over the plan period, and once this assessment is in place detailed measures will be considered.

¹¹ Haringey’s latest School Place Planning Report is available at <http://www.haringey.gov.uk/schoolplaceplanning>

10.5.3 Other health related issues relate to housing, air quality, noise and soil contamination. All of these issues are given stand-alone consideration below.

10.5.4 In **conclusion**, the plan will likely lead to **significant positive effects** given its emphasis on realising opportunities to provide new health facilities, as well as enhanced walking/cycling infrastructure and access to open space. As things stand, there is little emphasis on delivery of health facilities; however, it is understood that further discussions with relevant stakeholders and providers will be undertaken, and the findings of the IDP update will inform the final decisions taken at sites (at the planning application stage).

10.6 Housing

10.6.1 Allocations made through the Site Allocations DPD will ensure that the appropriate amount of land is allocated to meet the borough's **housing target**. Very few sites are set to be developed with no residential element, which serves to demonstrate that efforts are being made to maximise housing delivery.

10.6.2 The plan is not set to allocate smaller (less than ten dwellings or 0.25ha) sites (as this would be impractical). There has historically been some reliance on small sites, although it is noted that emerging policies in the DM DPD may reduce the numbers of **conversions** coming forward over the plan period, in order to protect family-sized housing. The Council is not relying on smaller sites to meet its housing target.

10.6.3 There are limited references to the **type of housing** that should come forward at particular sites, which is appropriate given that this issue is a focus of the DM DPD. The following references are notable:

- SA 13: Bury Rd Car Park (Wood Green) – establishes that existing social housing will need to be reprovided on the site or another local site.
- SA 44: Hillcrest (Highgate) – requires provision of affordable housing. It is noted that the **previous version** of the policy (Feb 2015) referenced 'social' housing.

10.6.4 It is also noted that SA 58 (Red House; East of the borough) – proposes the redevelopment of a **care home** and church building (to create a continued town centre frontage, new homes, and potentially a reconfiguration of open space); however, it is understood that there is sufficient care home capacity locally. Also, SA 51 Cranwood Care Home (Muswell Hill) supports redevelopment of a vacant care home.

10.6.5 There are specific 'housing' issues in the **Haringey Warehouse District** that are set to be addressed through an overarching DM Policy and associated allocations at: SA 30: Arena Design Centre, Crusader Industrial Estate (SA 31), Omega Works (SA 32), Vale/ Eade Rds (SA 33), Overbury & Eade Rds (SA 34) and Land between Seven Sisters and Tewkesbury Rds (SA 35) . On these designated industrial sites non-conventional residential development ('warehouse living') will be supported where sufficient living standards can be demonstrated, e.g. though demonstration of access arrangements, physical condition and layout of the existing buildings and accommodation on the site, and a return of dedicated employment floorspace to the area can be accommodated. Proposals for warehouse living on industrial sites not identified through policy will be resisted, and in this way existing problems associated with unauthorised warehouse living (e.g. around poor living environments impacting on the health of some individuals, typical of Houses in Multiple Occupation) will be addressed.

10.6.6 With regards to the specific issue of **Gypsy and Traveller** accommodation needs, the plan document is clear that sites which are being transferred from B2/B8 employment to a mix of uses provide the best opportunities for accommodating the Council's existing and emerging need.¹² However, as things stand the potential to provide for Gypsies and Travellers is not identified for any particular sites. There is one site specific reference currently: SA 5 (LBH Civic Centre, Wood Green) references the need to retain the traveller pitches adjacent to the site, and protect their amenity. An ongoing study is exploring the needs of the Gypsy & Traveller communities.

10.6.7 In **conclusion**, a targeted approach to housing delivery is set to be implemented through the plan, i.e. one that seeks to make best use of every site, recognising that opportunities / constraints vary considerably. **Significant positive effects** are predicted. Some concerns are raised around provision for Gypsies and Travellers, however.

10.7 Community cohesion

10.7.1 A number of targeted measures are set to be put in place to the benefit of community cohesion.

10.7.2 At **Haringey Heartlands** the intention is to create a sense of place through provision of a new urban square at Clarendon Square, and an enhanced Cultural Quarter at the Chocolate Factory and Parma House sites. For example, at SA 18: Wood Green Cultural Quarter (north) the intention is to enhance the public realm and ensure a focal point of the Cultural Quarter in the south of the site around Clarendon Road. Policy will require active frontages to both sides of Clarendon Road that contribute to the cultural output of the area.

10.7.3 Site specific proposals within the **Haringey Warehouse District** also reflect an overarching strategy, *to some extent*. Local residents have identified positives associated with having a creative community living nearby, and there are opportunities to capitalise on this through creation of space that can facilitate events and help to ensure the local community enjoys the spoils of the local cultural output. There are few DM requirements proposed that have an explicit focus on delivering this vision (although there are some, e.g. SA 34: Overbury & Eade Rds requires fine-graining of the street network in this area encouraging pedestrian permeability), but supporting text states that "further masterplanning may be desirable... this could include an SPD".

10.7.4 There are **numerous other instances** of site allocation policy referencing measures that will lead to benefits in terms of community cohesion. For example:

- SA 7: Wood Green Bus Garage – A new urban square will be created on the podium above the bus stabling.
- SA 11: Wood Green Library – Development at this important site (which signals the connection between Wood Green and its western hinterland) will provide for a new urban square with a pedestrian and cycling link through to Clarendon Square, enhanced town centre uses and a new library (plus residential development). The effect will be to help ensure a clear 'circuit' within the Centre.
- SA 15: Westbury & Whymark Aves (Wood Green) references the need for building to be set back at ground floor level to increase space for circulation along Wood Green High Rd, while also providing active frontages.
- SA 39: Former Highgate Rail Station & Gonnerman Antiques Site (Highgate) – *"Uses on the station site should enable the station to become a destination providing a range of functions that benefit the local community and help to draw visitors to the area."*

¹² This is due to the change of value between the existing and future land values is generally higher on these sites than on residential intensification schemes. This will allow for greater flexibility in terms of site design, which will better enable an appropriate site being created for pitch provision.

10.7.5 Finally, it is important to reference SA 23: Clarendon Rd South (Haringey Heartlands), which will impact on an existing **West Indian Cultural Centre**. Policy is set to require that alternative provision is agreed before development proceeds.

10.7.6 In **conclusion**, site specific opportunities for designing-in features to encourage community cohesion are set to be realised, and furthermore the policy approach to sites in Haringey Heartlands and Haringey Warehouse District will act in combination to ensure development of 'sustainable communities'. **Significant positive effects** are predicted.

10.8 Accessibility

10.8.1 As discussed above, under the 'Health' heading, there are few instances of policy within the draft plan looking to prescribe the community uses that should come forward at particular sites; rather, policy is flexible in this respect. This reflects the fact that a review of the Council's **Infrastructure Delivery Plan (IDP)** is underway to understand the levels of new infrastructure required in order to accommodate an increased population in Haringey.

10.8.2 There are many instances of sites being set to contribute to *improving* accessibility to some extent through the focus on ensuring **enhancements to movement / permeability**. In terms of more direct impacts (i.e. instances of sites directly **impacting on existing facilities**) the following sites are notable –

- SA 28 St. Ann's Hospital Site (South of the borough) - The site will be developed as residential in order to enable a rationalisation of the health facilities.
- SA 36: Finsbury Park Bowling Alley (South of the borough) – The Twelve Pins pub should be retained, and an acceptable community / leisure facility must be provided to replace the bowling alley (which is listed as an asset of community value).
- SA 41: Highgate School – There will be further consideration of how school facilities can be enhanced while simultaneously benefitting local communities including potentially increasing accessibility to and through the site.
- SA 57: Myddleton Road Local Centre (East of the borough) – *"Diversification of uses on Myddleton Road, enhancements to the urban realm, and improvements to local connections to encourage an increasingly viable and wider range of food and drinks establishments within the local centre."* It is clear that shifts in the uses at this local centre will need to be the focus of further consideration / monitoring.

10.8.3 In **conclusion**, whilst there remains uncertainty around whether or not the plan will put in place the necessary policy to ensure delivery of sufficient community infrastructure, the plan is set to perform well in that there is a focus on enhancements to movement / permeability. It is noted that the majority of strategic transport improvements will be taken at the London-wide level (by TfL).

10.9 Economic growth

10.9.1 The Further Alterations to the London Plan (2015) set out revised employment projections for Haringey. The FALP forecasts 12,000 additional jobs in the borough over the period 2011 – 2026. Over the period 2011 – 2036, it forecasts an additional 22,000 jobs in Haringey. This represents a 29.5% increase in jobs, the highest projected employment growth rate of all London boroughs.

10.9.2 At the same time, Haringey contains a number of employment sites that contain poor quality buildings, many of which are approaching the end of their functional lives, and have the potential to be used more intensively for knowledge-oriented uses. As such, a number of sites are allocated for **redevelopment** to encourage the development industry to invest in bringing the land forward into a new, **more intense employment use**, thereby enabling jobs growth.

- 10.9.3 In some cases, renewal will likely include allocating employment sites for mixed use redevelopment where a cross subsidisation through residential development can increase employment densities, and therefore, job numbers on the site. At a number of sites, the employment floorspace will decrease significantly, but there is an expectation that the **jobs density** on-site will increase. The average job density across Haringey's employment sites is currently 44m² per job, but redevelopment for office uses can enable a job density at a given site of 12-16m² per job.
- 10.9.4 In a number of instances the preferred approach is to redevelop sites currently with one storey of workspace to four storey mixed use with one storey used for employment (the others being residential) at an increased job density, leading to an increase in the number of jobs onsite. The Roundway (SA 64) in the east of the Borough is an example of a site where a scheme like this can be expected. Green Ridings House (SA 6) in Wood Green is another notable example of a site that will see a large decrease in employment floorspace but an increase in jobs onsite, although this is something of a special case as the building onsite is an old telephone exchange.
- 10.9.5 Public Transport Accessibility Level (**PTAL**) is a key factor that has influenced the approach taken for particular sites. Generally, an increase in jobs through mixed-use redevelopment is being sought on sites with a good PTAL rating (3+), whilst protection of existing job levels is acceptable on sites with a poor PTAL rating. There are limited exceptions to the principle where the number of jobs on sites will decrease significantly despite a high PTAL rating. The prime example is Station Rd Offices (SA 8) in Wood Green, where the employment floorspace will decrease from 24,700 m² to 4,800m² once residential dwellings are delivered; however, this site is currently an 8-10 storey office block, which is not an appropriate use given the need to deliver new homes in **Wood Green** (which will benefit the local economy in a different way).
- 10.9.6 The approach set to be taken in the **Wood Green Cultural Quarter** is also notable. As with other sites in Wood Green, there are currently multi-storey buildings used for employment, and a considerable loss of floorspace will be accepted (given wider objectives for the sites and surrounding area); however, with an increase in jobs density it is not expected that the number of jobs onsite will change significantly. Within the previous version of the plan (Feb 2015) each site was assigned an employment floorspace percentage target (either 50% or 33%); however, these targets have now been replaced with a requirement for the maximum floor space viable (as in the DM Policies DPD).
- 10.9.7 The approach set to be taken in the **Haringey Warehouse District** is also notable. The aim is to reintroduce employment floorspace on these sites, so creating a genuine mix of employment and warehouse living, while re-providing for current occupants (mixed use development), with cross subsidy from another higher value use. For example, at Arena Design Centre (SA 30) redevelopment will provide for commercial floorspace with the number of jobs and job density is increased, with policy stating that: *"The site will be given a Designated Employment Area: Regeneration Area status to reflect the Council's aspiration to create a mix of uses on this site through the re-introduction of creative employment uses."* There is general commitment within Policy SA2 that: *"In Warehouse living areas, as part of the regulation of these area, the original floorspace before conversion to residential use began will be replaced as part of new developments."* It is notable that the **PTAL** rating for this site is low, at 1 – 2, but permeability improvements in the local area are proposed to mitigate this.
- 10.9.8 There are three examples of builders yards that will be redeveloped for residential, with either a mix of employment, or else improving local pedestrian routes. The PTAL at each is 3 or below -
- SA 27: Wightman Rd (South of the borough) - redevelopment of existing builders yard for residential to enable an improved east-west connection along Burgoyne Rd.
 - SA 38: 460-470 Archway Rd (Highgate) - redevelopment of existing builders yard to develop new residential buildings and employment use.

- SA 43: Summersby Rd (Highgate) - redevelopment of existing builders yard for a mix of new employment, residential development, and potentially a hotel.

10.9.9 **Other strategic issues** that are set to be addressed through the Site Allocations DPD relate to Crossrail 2, Wood Green / Haringey Heartlands and Haringey Warehouse District.

- Crossrail 2 is expected to serve the borough with enhanced stations at Seven Sisters, Turnpike Lane and Alexandra Palace stations. Policy SA1 addresses the Council's emerging approach to managing land around the stations, with a view to ensuring that challenges and opportunities are addressed.
 - Sites within 400m (a 5 minute walk) of a proposed Crossrail 2 station will be closely scrutinised to ensure the proposed development optimises the future accessibility provided by the introduction of Crossrail 2. This may include ensuring a mix of uses and potentially enhanced infrastructure.
 - Sites within 1000m (10 minute walk) will be examined for how they can complement the introduction of Crossrail 2. This may include design issues such as provision of routes to and from the station, and consideration of density to include future PTAL increase.
- Wood Green is a designated growth area, and numerous site allocations are set to ensure a coordinated approach that will ensure that economic opportunities are realised including economic opportunities that link closely to the Centre's civic role. Traffic congestion is a specific issue that is set to be addressed through specific policy, with SA 29 (Arena Retail Park) requiring that development reduces traffic on Green Lanes.
- A new local strategic policy for the Haringey Warehouse District within the DM DPD (DM39) seeks to increase the number of jobs in the area, and preserve the creative community that is currently present. Certain sections of LSIS are retained under Policy SA 1, but other sections are proposed to be changed to Local Employment Area: Regeneration Area, to reflect the changes underway in this area.

10.9.10 In **conclusion**, the plan is set to deliver on ambitious jobs growth targets through a focus on increasing the employment density at a range of existing employment sites. It has to be assumed that this will be to the benefit of the local and London-wide economy in the long term; however, there are some risks/uncertainties given that some industries will find it increasingly difficult to operate in Haringey. It is also important to note that targeted approaches are set to be put in place at Wood Green, Haringey Warehouse District and at locations around future Crossrail 2 stations, which will contribute to economic growth and diversification. Overall, **significant positive effects** are likely.

10.10 Skills and training

10.10.1 As things stand, there are no references to skills / training; however, it is understood that the emerging update to the **Infrastructure Delivery Plan (IDP)** will inform decisions (at the planning application stage) on the types of community uses required at particular sites. It is also important to note that skills and training is a focus of the adopted Strategic Policies (SP 9), DM Policies DPD and adopted Planning Obligations SPD (2014), with Chapter 7 encouraging use of planning obligations to deliver the facilities that will ensure the up-skilling of local residents so that they can better compete in the local jobs market. There is also a focus on ensuring employment, apprenticeships and work placements during the construction phase, with the level of development anticipated likely to create opportunities for these types of schemes.

10.10.2 In **conclusion**, whilst skills and training is not set to be a focus of the plan, this is broadly appropriate given the potential for opportunities to be realised through other plans.

10.11 Economic inclusion

- 10.11.1 There are specific issues in the **Haringey Warehouse District** that are set to be addressed through an overarching policy and a series of site allocations. The aim is to regulate warehouse living, thereby enabling enforcement action to be taken where necessary to avoid inappropriate instances of commercial floorspace becoming de facto residential use. The outcome should be a situation whereby occupants are ensured an appropriate standard of living; the existing creative industries and SME sectors are supported and given room to grow; and the employment offer of sites is maximised (including traditional industrial uses in some instances). Individual sites in this area should only come forward as part of a masterplan, given the bespoke issues involved at each site.
- 10.11.2 Also of note are the numerous instances of site specific policy requiring that: “Capped commercial rents will be expected in this area.” This requirement is set to apply to sites in Wood Green and Haringey Warehouse District in particular.
- 10.11.3 Finally, it is noted that there is at least one instance of site specific policy being established with a view to protecting an existing employment use. Specifically, SA 61: Barber Wilson is set to require that the presumption in favour of retention / conversion of historic industrial buildings on site, that house viable businesses. This approach reflects a consultation response received on this subject.
- 10.11.4 In **conclusion**, targeted approaches should be implemented that will ensure support for SMEs; however, there is little explicit consideration given to this subject (aside from signposting the DM policy on capped commercial rents). Also, it is important to note that there are some concerns about the potential for the economic growth strategy to marginalise some sectors (in particular, ‘traditional industries’), potentially with implications for those that rely on those sectors for employment.

10.12 Town centres

- 10.12.1 There are opportunities to enhance the function of **Wood Green** (the sole Metropolitan Town Centre in the Borough) through diversifying uses, which in practice means delivering a wide range of entertainment, leisure, and community facilities alongside new housing. The introduction of two new Crossrail 2 stations at Turnpike Lane and Alexandra Palace stations will stimulate investment and growth in the area. The construction of Crossrail 2 will require land to be safeguarded in the short term, but may also offer opportunities for redevelopment in the longer term. In particular, Turnpike Lane provides development potential to enhance the southern end of Wood Green High Rd. The Turnpike Lane end of Wood Green is personified by low height, large floorplate retail units, and this is considered to be inconsistent with Wood Green’s status as a Metropolitan Town Centre with high public transport accessibility.
- 10.12.2 There are also considerable areas of developable land to the west of Wood Green, which leads to the potential for a new suburb (**‘Haringey Heartlands’**). This is a predominantly industrial area between Wood Green and the Great Northern rail line. The focus is the Clarendon Square site, where planning permission has been granted to redevelop redundant gas holders into new homes, and businesses centred on a new urban square. SA 22: Clarendon Square seeks to ensure that any opportunity to revisit the planning permission for the site seeks to maximise the role of Clarendon Square as a destination that complements Wood Green Metropolitan Town Centre.
- 10.12.3 It is also the case that the ongoing regeneration of Alexandra Palace will benefit Wood Green (and elsewhere in the Borough). There are opportunities for development of particular sites to enhance the connection between Wood Green and the Palace, both via Alexandra Palace station and Wood Green underground station, but also by foot through Haringey Heartlands.
- 10.12.4 The following are examples of site allocations geared towards ensuring the functioning of Wood Green / Haringey Heartlands:

- SA 11: Wood Green Library – The new urban square, including an entrance to a new library facility, will serve as the new civic heart of Wood Green.
- SA 12: The Mall – *“Greater open space for circulation should be created in order to make the middle section of the High Road a more pleasant place to visit.”*
- SA 14: 16-54 Wood Green High Rd – *“The standard of architecture and urban realm on the High Rd frontage should be of the highest order.”*
- SA 21: Clarendon Square Gateway – This site plays an important role in linking the Haringey Heartlands area to Wood Green High Rd. The future development will cross subsidise a safe pedestrian and cycling link from Wood Green to Alexandra Palace Park via the Heartlands area, and Cultural Quarter.

10.12.5 **Finsbury Park** is another important centre that is set to be enhanced through the Plan. New town centre frontages are proposed, alongside the allocation of Finsbury Park’s District Centre status, thus complementing its existing designation in LB Islington. The site allocations alongside the guidance included in the Finsbury Park Town Centre SPD will guide development in this area. Finsbury Park Bowling Alley (SA 36) is a key site, where redevelopment will create an improved entrance to Finsbury Park from the station, a new leisure facility and an improved town centre offer. It is also notable that: “Development proposals must show how it impacts upon the Park, and improves its overall function and appearance.” SA 37: 18-20 Stroud Green Rd is the other site allocation that will contribute to the functioning of the centre.

10.12.6 Other notable centres are -

- Green Lanes – where a notable policy is set for Arena Retail Park (SA 29). Uses fronting onto Green Lanes redevelopment should provide town centre uses to extend the town centre south towards Hermitage Rd on the east side of the rd. This redevelopment should realign retail along Green Lanes, with this becoming a primary shopping frontage.
- Myddleton Road Local Centre (SA 57) – Policy will require: *“Diversification of uses, on Myddleton Road, enhancements to the urban realm, and improvements to local connections to encourage and increasingly viable and wider range of food and drinks establishments within the local centre”*. It is also understood that the level of transition from retail to food and drink will be closely monitored, and the findings used as a test case to inform future policy for other local centres in the borough.

10.12.7 In **conclusion**, a targeted approach is set to be implemented at Wood Green (including Haringey Heartlands) that should ensure that the function of this town centre is maintained and enhanced in the long term. A focus on residential development (high density in some instances) should ensure good potential for town centre uses and community infrastructure, and the policies for Wood Green / Haringey Heartland sites are set to put in place a framework to guide this (although some detail will be put in place only once the IDP is complete). A proactive approach is also being taken with respect to Finsbury Park. Overall **significant positive effects** are likely.

10.13 Biodiversity

10.13.1 Generally, development will avoid **important areas** (SINCs and areas identified as functioning as an ecological corridor). In the limited number of instances where development will (or may) impact on a sensitive site, policy will be put in place to ensure that targeted enhancements are also delivered (with a view to ensuring no net impact on biodiversity).

10.13.2 Detailed site specific policy is set to be put in place to ensure a targeted approach to **green infrastructure** delivery (i.e. realisation of the ‘Green Grid’ ambition). Generally access and biodiversity objectives can be delivered in support of one another, although there are instances where there is some tension.

- 10.13.3 The following examples of policy reflect the breadth of issues, and the breadth of measures being proposed through site allocations policy:
- In **Wood Green**, there is the opportunity to make a **green chain** linking Wood Green Common to the old rail line between Cumberland/Wolseley and Bradley/Barrett Rds, and Trinity Gardens. Accessibility benefits are set to be realised alongside biodiversity.
 - SA 16: Green Ridings House – *“This site can complete the green chain from Wood Green Common through to Trinity Gardens. Planning Obligations will be sought to improve the public space fronting the site, and enhance its ecological credentials.”*
 - SA 8: Station Rd Offices – *“Open space will be created on this site through the connection of a green chain linking Wood green Common through this site.”*
 - SA 10: Morrison's Wood Green – *“Existing semi-mature trees along the western and north-western boundary should be retained and protected in the development.”*
 - SA 25: Land adjacent to Coronation Sidings (Haringey Heartlands) – *“The site is currently part of an underperforming north-south ecological corridor running along the rail line. While **accepting that the quantum of corridor in this area will be reduced**, the impact of development will need to be identified and mitigated to ensure that the function of the corridor is protected through the development. At present the land is not considered to be positively contributing to the principles of the corridor, and any future development should ensure a positive contribution...”*
 - SA 27: Wightman Rd (South of the borough) – *“The site adjoins a north-south ecological corridor running along the rail line, and this should be **preserved and where possible enhanced** through the development... Open space will be provided to the rear, and should complement the ecological corridor running along the rail line.”*
 - SA 29: Arena Design Centre - Development should enhance the ecological corridor to the north of the site; and **edge treatment should complement the Gospel Oak-Barking rail line ecological corridor**, through a new green chain, linking the “slopes” behind Finsbury Park Avenue towards Finsbury Park.
 - SA 38: 460-470 Archway Rd (Highgate) – *“An ecological corridor runs along the northern edge of the site. While the site does not enter the ecological corridor itself, development will need to demonstrate that **no adverse impact, and/or suitable mitigation** is provided*
 - SA 43: Summersby Rd (Highgate) - *“**The impact on the Queen’s Wood should be minimised**, potentially by ensuring that light from the site is directed downwards.... The impact of removing any trees on both this woodland and the wider SINC of Queen’s Wood will need to be carefully considered.”*
 - SA 52: Pinkham Way (West of the borough) – The North London Waste Authority own part of the site, and have nominated it for waste related uses, whilst the Council’s ambition is for employment uses on the site. There is a tension with the existing SINC designation, which will need to be addressed if the site is developed. Policy is set to state that: *“Before any development is granted planning permission, a **detailed Biodiversity Study** will be carried out to identify how the designated SINC can be enhanced by the development...”*
 - Other sites where biodiversity issues are briefly referenced include SA 28: *St. Ann’s Hospital*; and SA 54: *Tunnel Gardens*.
- 10.13.4 In **conclusion**, it is clear that evidence-gathering work around biodiversity constraints and opportunities has fed through directly into policy. Not only does site specific policy look to conserve and enhance onsite and adjacent areas of biodiversity value, but it is also the case that policy reflects the need to ensure that areas are functionally linked as part of a borough-wide ecological network. **Significant positive effects** are predicted.

10.14 Townscape and cultural heritage

- 10.14.1 There is an inherent need in some instances to trade-off between, on the one hand, the need to deliver **tall buildings** to mark locations / develop 'place' or make development viable, and on the other hand the objective of conserving heritage / preserving valued townscape. The most sensitive locations tend to be the designated Conservation Areas and areas that contribute to long distance views and/or views to Alexandra Palace and other areas of open space.
- 10.14.2 The February 2015 version of the plan sought to apply a carefully targeted approach to tall buildings. However, public responses were greatly divided on this approach, with opposition (e.g. prescribed heights too low or too high) and differing views on the most suitable locations. In response, the Council has modified the preferred approach and is now to stop short of setting site specific building height guidelines. Rather, all development proposals will be assessed against the building heights policy in the Development Management Policies DPD.
- 10.14.3 **Wood Green** is a suitable location for taller buildings, which will mark the area as a location for people to visit, invest in, and navigate around, as set out in the Tall Building Validation Study (2015). Tall buildings will be appropriate in specific locations, marking either end of the town centre and/or a new connection towards Haringey Heartlands. Locations have been carefully considered through the Urban Characterisation Study to ensure views to and from Alexandra Palace and St. Michaels Church are protected. Areas potentially suitable for taller buildings are: Turnpike Lane, marking the new Crossrail station and the southern end of the shopping precinct; Wood Green underground station, marking the Piccadilly Line station and the northern end of the shopping precinct; Wood Green Library, signalling the connection between Wood Green and Haringey Heartlands, and a new urban realm and entertainment location; Penstock foot tunnel, signalling the connection between Haringey Heartlands/Wood Green area, and Alexandra Palace park.
- 10.14.4 Within **Wood Green**, a host of site specific policy measures are set to be put in place with the aim of mitigating negative effects on townscape/heritage. Examples are as follows -
- SA 5: LBH Civic Centre - The public realm to the front of the site will be improved to enhance the Trinity Gardens Conservation Area. Also, the setting of St. Michaels Church should be preserved in particular views from the High street, Trinity Gardens to the west, and to the east from Crescent Gardens. There is also a commitment to ensuring that the new residential block is built in 'a style that complements the modernist Civic Centre'.
 - SA 6: Green Ridings House - where development should "contribute positively to the Trinity Gardens Conservation Area."
 - SA 7: Wood Green Bus Garage - Heights will be restricted next to the properties on Ringslade Road. This will be achieved through the introduction of news-style development between the new green link, and these residential properties.
 - SA 10: Morrison's Wood Green - The Gaumont Cinema to the south of the site is Grade II* Listed, and the terraces adjacent on the High Road (nos. 1-19 incl. The Broadway) make a vital contribution to the setting of the Listed Building. Any development should consider the impact of the proposals on the setting and significance of these heritage assets.
 - SA 11: Wood Green Library - The former Coronet Cinema to the north of the site has listed status, and has an excellent interior, but the use as a boundary wall will be permitted so long as the historic fabric is not affected. Also, adequate sound and vibration mitigation measures must be incorporated, reflecting its desired reuse as a theatre, cinema or other cultural venue.
 - SA 13: Bury Rd Car Park - Development should complement the buildings in the Noel Park Estate Conservation Area. Heights should be restricted to four storeys along the interface, and have entrances that present onto the street.

- SA 14: 16-54 Wood Green High Rd - The Victorian shopping parade immediately north of the site on Wood Green should be retained and enhanced.
- SA20 (Wood Green Cultural Quarter East) - the Council considers that the Chocolate Factory building creates a positive active frontage well suited to being part of the future of the site while linking with the past, despite representations received highlighting concerns with the policy requirement to retain existing buildings.

10.14.5 It is also the case that mitigation has been strengthened since the February consultation in some cases, where the removal of reference to specific building heights leads to a risk to townscape/heritage. For example, at SA18 (Wood Green Cultural Quarter North) a guideline has been added that development on the site should make a positive contribution to the neighbouring conservation area.

10.14.6 **Elsewhere**, there are numerous examples of allocations aiming to ensure that townscape and heritage assets (Conservation Areas and Listed Buildings) are proactively conserved.

- SA 30-38: Harringey Warehouse District - there is some focus on maintaining the unique warehouse character of the area.
- SA 40: Former Highgate Rail Station & Gonnerman Antiques Site - seeks to ensure that the existing locally listed station building is retained, and brought into use. The existing platforms should be used as the basis for the enhancement to the site, to recognise the historical use of the site.
- SA 55: Alexandra Palace - will help to ensure that the regeneration of Alexandra Palace is continued in an appropriate manner to the existing historic building, given that the introduction of Crossrail to Alexandra Palace station, and also to New Southgate station, will lead to increased pressures. Detailed measures are set out in relation to the western part of the Palace, where development of restaurant and hotel uses will be supported.

10.14.7 It is also noted that for all sites that fall within a **Conservation Area** there is a policy stipulation that development should “preserve or enhance its appearance as per the statutory requirements”. Sites that fall within a Conservation Area are as follows –

- SA 5: LBH Civic Centre (Wood Green) falls within the Trinity Gardens Conservation Area
- SA 38: 460-470 Archway Rd; SA 45: Highgate Magistrates Court; SA 40: Former Highgate Rail Station & Gonnerman Antiques Site; SA 41: Highgate School; SA 43: Summersby Rd; and SA 44: Hillcrest all fall within the Highgate Conservation Area.
- SA 49: Cross Lane falls within the Hornsey Water Works & Filter Beds Conservation Area
- SA 55: Alexandra Palace falls within the Alexandra Palace Conservation Area
- SA 57: Myddleton Road Local Centre falls within the Bowes Park Conservation Area.
- SA 64: The Roundway - The prominent location attributes itself to an opportunity to create a visible architectural landmark, marking the entrance and setting of Bruce Castle. It could act as a ‘wayfinder’ for the heritage assets nearby. More generally, new development should be of high quality and enhance the setting of both the Conservation Areas and the grade I listed Bruce Castle, and should also contribute to the setting of Bruce Castle Park (a non-listed heritage and community asset).

10.14.8 In **conclusion**, whilst the intention is no longer to specify building heights through site specific policy, numerous policy measures are set to be put in place in order to ensure that potential impacts to Conservation Areas, other heritage assets and important views (e.g. to/from Alexandra Palace) are avoided, informed by the Urban Characterisation Study. Most if not all site allocations in Wood Green appear to reflect a desire to maintain and enhance the setting of heritage assets and ensure strategically important views, although there perhaps remains a risk that sites will impact in combination (here, and also possibly elsewhere). **Significant positive effects** are predicted, given a baseline situation whereby there is high probability of development schemes impacting in combination.

10.15 Open space

10.15.1 The Open Space Study 2014 identified areas of open space deficiency, taking into account both existing deficiency and deficiency set to arise in the future given projected population growth. There is difficulty in increasing the quantity of public open space in Haringey as this is an urban borough and the focus is therefore, primarily on the function, quality, usage and accessibility of existing public open space.

10.15.2 A solution is to apply a '**Green Grid**' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. A DM Policy is set to be adopted that will establish the overall strategy, and a number of site allocations will help to ensure that it is implemented. Across the borough, strategically important features within the Green Grid include Alexandra Palace Park (given its proximity to Wood Green), various areas of Metropolitan Open Land (MOL) and SINCS (where they are accessible). Another priority for the east of the borough is to open-up access to the Lee Valley regional Park.

10.15.3 The following sites are set to **contribute to the Green Grid**, or otherwise ensure easily accessible open space -

- SA 7: Wood Green Bus Garage - Open space will be created on this site through the connection of a green chain linking Wood Green Common through this site.
- SA 11: Wood Green Library – The site will provide a civic open space / urban square.
- SA 17: North of Hornsey Rail Depot - Development should create improved and clearer access to the New River along the northern edge of the site.
- SA 19: Wood Green Cultural Quarter (south) - Coburg Rd may become part a predominantly cycle & pedestrian route linking Wood Green with Alexandra Palace and the west of the borough through the Penstock foot tunnel.
- SA 28 St. Ann's Hospital Site - New open space should be provided on the site which compliments the nearby Chestnuts Park, and in the area south of the rail line with Chestnuts/Downhills/Lordship parks
- SA 33: Vale/Eade Rd - Planning obligations to open up the south bank of the New River and institute a linear park should be explored through this development.
- SA 38: 460-470 Archway Rd - The opportunity for provision of a new entrance to Highgate Wood should be explored.
- SA 41: Highgate School - Exploration of how school facilities can be enhanced while simultaneously benefiting local communities including potentially increasing accessibility through the site. Open space should be made as accessible as possible.
- SA 42: Highgate Bowl – The aim is to achieve protection of the Highgate Bowl as open space, and improvement of public access through limited redevelopment of Townsend and Duke's Head yards. The entrances to the yard roads should signal the open space hidden behind, encouraging new users of the open space.

- SA52: Pinkham Way – if appropriate development may be required to improve access to the SINC.

10.15.4 In **conclusion**, it is clear that evidence-gathering work around issues and opportunities has fed through directly into policy. Recognising that there is little or no potential to increase the quantity of open space, efforts are focused on increasing the quality of open space, and access to open space. The plan is set to contribute to Green Grid objectives, and as such lead to benefits felt at a larger-than-local scale. **Significant positive effects** are predicted.

10.16 Water resources

10.16.1 Thames Water proposes to continue the Victorian Mains Replacement programme, and hence the following policy stipulation is made for many of the sites: *“Applicants must consult with Thames Water regarding both wastewater and water supply capacity upon the preparation of a planning application.”* Previously (Feb 2015), the policy was set to go slightly further, stipulating that provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.

10.16.2 Water supply and demand management measures are primarily a matter for consideration at the London-scale, but it is noted that the Council has been consulting with Thames Water regarding the issue of water supply. It is understood there is no suggestion that the total quantum of development proposed cannot be accommodated within existing provisions, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey’s Infrastructure Delivery Plan.

10.16.3 In **conclusion**, there is little potential for the plan to impact significantly on the water resources baseline. London-wide and Haringey-specific development management policy will ensure that ‘sustainable drainage’ and water efficiency measures are implemented.

10.17 Soil and land quality

10.17.1 A number of site allocations are set to bring back into use underused brownfield land, remediating any ground **contamination** in the process. This is particularly the case in Haringey Heartlands. Clarendon Square (SA 22) – currently a vacant former gas works - is a prime example. Contamination is a wide-spread issue in the borough, which has led to the following policy stipulation being drafted for most sites: *“Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place. Mitigation of and improvement to local air quality and noise pollution should be made on this site.”*

10.17.2 In **conclusion**, site specific policy will be put in place to make the best use of underused brownfield sites, and as such it is appropriate to conclude **significant positive effects**.

10.18 Flood risk and climate change

10.18.1 Opportunities to **de-culvert the River Moselle** are set to be explored. At a number of sites (e.g. SA 9: Mecca Bingo; and SA 61: Barber Wilson) investigations around possible deculverting should be facilitated through any development; whilst SA 11: Wood Green Library, SA 12: The Mall and SA 21: Clarendon Square Gateway are examples of policies that are set to go further. Here policy will state that: *“Any development in this area should ensure that as a minimum the culvert is made safe, and ideally the potential for the Moselle to be deculverted is explored. It may be possible that a deculverted river could be a focal point for the new urban square.”*

- 10.18.2 It is noted that at SA14: Mecca Bingo, the Environment Agency has suggested an eight metre buffer for development adjacent to Moselle Brook culverts, however this is not consistent with meeting the housing targets and hence the recommendation has not been implemented. The Council's view is that, due to the Growth Area location, an eight metre buffer would not be acceptable and a smaller buffer area should be negotiated.
- 10.18.3 Flood risk is an issue at s 52: Pinkham Way, where there is residual 1 in 100 year + Climate change flood risk from Bounds Green Brook to the north of the site. Policy is set to require that more vulnerable uses are kept from this part of the site in line with the sequential test.
- 10.18.4 In **conclusion**, necessary policy measures are set to be put in place to require the avoidance of development within flood risk areas (in-line with sequential test). It might also be expected that design-measures to mitigate risk should be a focus for some sites, although this does not seem to be the case with the current draft policies. Notably, a highly proactive approach is set to be implemented with regards to de-culverting / naturalising the River Moselle, which should lead to benefits not only in Haringey but also at other locations down-stream. On this basis **significant positive effects** are predicted.

10.19 Air quality

- 10.19.1 Air quality is a wide-spread issue in the borough, which has led to the following policy stipulation being drafted for most sites: *"Mitigation of and improvement to local air quality and noise pollution should be made on this site."* It is noted that this policy stipulation is not made for any sites in the west of the borough, reflecting the fact that air quality is less of a concern here.
- 10.19.2 In **conclusion**, it is not clear that site specific measures can be implemented to directly address air quality issues, given that poor air quality is widespread across the borough; however, this should be the focus of further investigation.

10.20 Noise

- 10.20.1 **Noise pollution** is a wide-spread issue in the borough, which has led to the following policy stipulation being drafted for most sites: *"Mitigation of and improvement to local air quality and noise pollution should be made on this site."* It is noted that this policy stipulation is not made for sites in the east of the borough, reflecting the fact that noise is less of a concern here and that emerging DM Policies can appropriately address this matter
- 10.20.2 Noise is a particular issue for some **sites that border a rail line**, and where this is the case specific policy measures are set to be put in place -
- SA 23: Clarendon Rd South - Close attention in the design of this site should be had to the impact of the railway embankment on future occupants of the site.
 - SA 27: Wightman Rd - The design of new buildings on this site should have regard to the noise from road and rail links nearby.
 - SA 37: 18-20 Stroud Green Rd - A new communal courtyard should be created, with development providing a buffer from the noise on Stroud Green Rd and the rail line.
- 10.20.3 In **conclusion**, a targeted approach is set to be implemented that should ensure sites adjacent to railway lines are delivered in such a way that noise pollution issues are avoided or mitigated, e.g. through attenuation measures or layout measures that separate sensitive receptors from the noise source. There may be opportunities to go further through policy, i.e. identify other sites where noise may be an issue and put in place policy accordingly.

10.21 Energy and carbon

- 10.21.1 There are widespread opportunities around **decentralised energy**, which is a subject of **ongoing work** with a view to developing a masterplan and establishing which sites should play a role in creating a local network. To date, opportunity areas have been established, and where a site falls into one of these areas then the following policy stipulation is set to be made: *“This site is identified as being in an area with potential for being part of a de-centralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network.”* It is noted that this policy stipulation is made for all sites in Wood Green, but none of the sites in Highgate or the west of the borough, owing to the key priorities areas established for implementing networks in the Council’s emerging DE Masterplan. The DM Policies DPD will set further requirements in this regard, and other sites across the west of the Borough may, over the plan period, be required to support objectives in this regard.
- 10.21.2 In **conclusion**, there are considerable opportunities around implementing decentralised energy networks, and it is vital that emerging understanding of these opportunities continues to feed-in at the planning application stage.

10.22 Waste management

- 10.22.1 A number of Safeguarded Waste Sites will continue to be **safeguarded** for waste until alternative provision has been made. With regards to **Pinkham Way** (SA 52), which is not a Safeguarded Waste Site, the North London Waste Authority own part of the site, and have nominated it for waste related uses. There is a tension with the existing SINC designation, which will need to be addressed if the site is developed.
- 10.22.2 In **conclusion**, the need to cooperate closely with the North London Waste Authority has been highlighted. The emerging North London Waste Plan will deliver on objectives around ensuring sufficient local capacity for waste management.

10.23 Sustainable transport

- 10.23.1 Issues around ‘**accessibility**’ have already been discussed above (under the ‘accessibility’ heading; under the ‘economic growth’ heading where the council’s approach of increasing the number of jobs on sites with a high PTAL rating is explained; and under the ‘biodiversity’ heading, where the ‘Green Grid’ approach is discussed). Additional issues are discussed here, with a view to demonstrating that the objective of encouraging walking, cycling and use of public transport is a major focus of the Plan.
- 10.23.2 Wood Green is notable for having very good access to public transport services. As such, the following policy stipulation around **parking** is set to be made for all sites (with the exception of SA 12: The Mall): *“Parking should be minimised on this site due to the excellent local public transport connections.”* This policy stipulation is also set to be made for one site in the south of the borough (SA 27: Wightman Rd), and at another (SA 29: Arena Retail Park) policy is set to state that: *“Parking should be managed down on this site due to the excellent local public transport connections. The parking requirements of the retail in the new scheme should be considered however.”*
- 10.23.3 A range of other site specific policy measures are set to be put in place, including:
- SA 22: Clendon Square - Provide optimised **north south link** through the site improving the link to the future Alexandra Palace Crossrail station
 - SA 10: Morrison’s Wood Green - A new **pedestrian route** should be created through the site.
 - SA 11: Wood Green Library - This site must provide an attractive, safe and generous east west pedestrian and cycling connection linking into the wider **cycle network**; and, in

addition to the main east-west route, a pedestrian loop towards Station Road should be facilitated through the site.

- SA 16: Turnpike Lane Triangle - Could form an important **node on the local cycle network**, network by enabling a connection from Frome Rd through the bus station and Ducketts Common towards Hornsey and the West of the Borough. The ground floor of the Westbury Avenue frontage of the building could be a suitable location for a secure cycle storage facility linked to Turnpike Lane station.
- SA 17: North of Hornsey Rail Depot - Mixed use residential and employment will secure improved **pedestrian and cycling link to Hornsey rail station** and the west of the borough, and improvements to the New River Path.
- SA 19: Wood Green Cultural Quarter (south) - Development contributions for a dedicated cycle and pedestrian **crossing of Western Rd into the Penstock Tunnel** should be secured through development on this site.
- SA 24: NW of Clarendon Square - Development contributions for a dedicated cycle and pedestrian **crossing of Western Rd** into an enhanced Penstock Tunnel should be secured through development on this site.
- SA 27: Wightman Rd - This development should help to fund an improvement to the **bridge at Harringay station**, to improve east-west connections. Measures to **reduce the gradient** of the bridge into Burgoyne Rd should particularly be considered.
- SA 29: Arena Retail Park - The potential to connect the Harringay Warehouse District more directly to Harringay Green Lanes station should be explored by creating a new pedestrian link.
- SA 52: Pinkham Way - **Connectivity to New Southgate station**, which Crossrail 2 is proposed to be connected to, should be optimised.
- SA 61: Barber Wilson - Residential development will be permitted on this site to enable creation of **a new pedestrian and cycle route**.
- SA 64: The Roundway - Consolidation of the site for employment-led mixed use development with residential will enable an improved east-west cycling connection.

10.23.4 It is also important to bear in mind that site specific measures will not be implemented 'in a vacuum'. TfL are expected to invest in cycling through a range of measures such as the proposed cycle superhighway through Tottenham and Quietways cycle routes. Other investment to promote cycling being led by the Borough includes cycle training, local cycle routes and cycle parking.

10.23.5 In **conclusion**, it is clear that a policy priority is to ensure high density residential and employment development where there is the highest PTAL, and furthermore a carefully targeted approach is set to ensure that sites contribute to borough-wide walking and cycling networks. **Significant positive effects** are predicted.

10.24 Overall conclusions

- 10.24.1 Significant positive effects are predicted in terms of the majority of the 21 sustainability topics that have provided a framework for the appraisal. In each instance, the appraisal finds that a carefully targeted approach to site specific policy is emerging that recognises the need for individual sites to contribute to wider objectives, whether borough-wide objectives (e.g. around walking/cycling, accessibility and biodiversity) or sub-area specific objectives (notably objectives for Wood Green, Haringey Heartlands and the Haringey Warehouse District).
- 10.24.2 Under some topic headings, whilst significant positive effects are predicted overall, the appraisal also serves to identify potential draw-backs / risks or the potential for policy to 'go further'. Most notably, with regards to economic growth and economic inclusion, whilst the effect of the plan will be to support economic growth and diversification, there are drawbacks given that some industries will find it increasingly difficult to operate in Haringey. Also:
- Whilst significant positive effects are predicted in terms of 'crime' overall, further opportunities to design-out crime should be explored;
 - Whilst significant positive effects are predicted in terms of 'health' overall, emerging evidence around requirements for health facilities should be taken into account;
 - Whilst significant positive effects are predicted in terms of 'housing' overall, emerging evidence around Gypsy and Traveller accommodation needs should be taken into account;
 - Whilst significant positive effects are predicted in terms of 'townscape and heritage' overall, there will be a need to take careful account of the potential for tall buildings to impact, including through in-combination impacts; and
 - Whilst significant positive effects are predicted in terms of 'flood risk' overall, further consideration might be given to policy measures aimed at avoiding and mitigating risk.
- 10.24.3 There are no instances of the appraisal concluding significant negative effects for a sustainability topic; however, there are number of instances where it is not possible to conclude significant positive effects. In several instances it is the case that policy requirements are broad at this stage, in the knowledge that these issues can be sufficiently addressed at the planning application stage and appropriately managed through the Borough-wide DM Policies DPD. Most notably, it is not possible to conclude significant positive effects in terms of 'accessibility' at the current time, given that the Infrastructure Delivery Plan (IDP) update is yet to be finalised and feed into site specific policy requirements around community infrastructure delivery; nor is it possible to conclude predict significant positive effects in terms of 'energy and carbon' as there is still much work to be done in order to ensure that opportunities for delivering decentralised energy networks are realised.

PART 3: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?

11 INTRODUCTION (TO PART 3)

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

12 PLAN FINALISATION

12.1.1 Subsequent to publication of the Pre-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).

12.1.2 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*.

13 MONITORING

13.1.1 At the current time, there is a need only to present 'measures envisaged concerning monitoring'. In-light of appraisal findings (i.e. predicted effects and uncertainties) presented in Part 2 above, monitoring efforts might focus on:

- The shift in employment types within localities;
- Gypsy and Traveller accommodation needs;
- Building heights in the vicinity of heritage assets;
- The length of the Moselle river that is culverted;
- The way in which schemes seek to contribute to / make use of decentralised energy.

APPENDIX I - REGULATORY REQUIREMENTS (1)

Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. The table below interprets Schedule 2 requirements.

Schedule 2

Interpretation of Schedule 2

The report must include...

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the SA Report]	
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.		
(c) the environmental characteristics of areas likely to be significantly affected;	The likely significant effects associated with the draft plan		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'context'?</i>	i.e. answer - <i>What's the scope of the SA?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	i.e. answer - <i>What's the 'baseline'?</i>	
(i) a description of the measures envisaged concerning monitoring.	Environmental characteristics of areas likely to be significantly affected		
	Key environmental problems / issues and objectives that should be a particular focus of appraisal	i.e. answer - <i>What are the key issues & objectives?</i>	

APPENDIX II - REGULATORY REQUIREMENTS (2)

Appendix I signposts to broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met.

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 4 ('What's the scope of the SA'). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 5 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix III.</p> <p>With regards to explaining 'how... considerations have been taken into account' -</p> <ul style="list-style-type: none"> • Chapter 6 ('Reasons for selecting the alternatives dealt with') explains how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015. • Chapter 8 ('Reasons for selecting/developing the preferred approach') explains the how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. • Chapter 10 ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in Feb 2015.

<p>f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors. (Footnote: These effects should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects);</p>	<ul style="list-style-type: none"> Chapter 7 ('Alternatives appraisal findings') presents the appraisal of reasonable alternatives. Chapter 10 ('Appraisal of the draft plan') presents the appraisal of the draft plan. <p>As explained within the various methodology sections, as part of appraisal work consideration has been given to the established SA scope, and the need to consider the potential to various effect characteristics/dimensions.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The Feb 2015 'appraisal of the draft plan' (Chapter 14 within the Interim SA Report) made a number of recommendations, and subsequently these were taken on-board by the Council when finalising the plan for publication/submission. At the current time, Chapter 10 ('Appraisal of the draft plan') concludes by highlighting a number of ways in which the plan might 'go further' in order to more fully address specific sustainability considerations.</p>
<p>h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;</p>	<p>Chapter 6 deals with 'Reasons for selecting the alternatives dealt with'. Also, Chapter 8 presents 'Reasons for selecting/developing the preferred approach'. Methodology/limitations are discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives as appropriate.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 13 presents 'measures envisaged concerning' monitoring.</p>
<p>j) a non-technical summary of the information provided under the above headings</p>	<p>The NTS is a separate document.</p>
<p>The SA Report must be published alongside the draft plan, in-line with the following regulations</p>	
<p>authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)</p>	<p>An Interim SA Report, which essentially presented all the information required of the SA Report, was published for public consultation alongside the draft plan in February 2015, under Regulation 18 of the Local Planning Regulations. At the current time, the SA Report is published alongside the pre-submission plan, under Regulation 19, so that representations might be made ahead of submission.</p>
<p>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</p>	
<p>The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.</p>	<p>The Council has taken into account the Interim SA Report (Feb 2015), alongside consultation responses received, when finalising the plan for publication/submission. Appraisal findings presented within this current SA Report will inform a decision on whether or not to submit the plan, and then (on the assumption that the plan is submitted) will be taken into account when considering the plan at Examination (i.e. taken into account by the Planning Inspector, when considering the plan's soundness, and the need for any modifications).</p>

APPENDIX III - CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of sustainability objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' and 'baseline' and also subsequent to consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal work under the SA framework.

What's the sustainability context?

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.

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.

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 2008¹³. 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.

What's the sustainability baseline?

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.
- There is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation.
- Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery
- There is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence

¹³ 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.

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.
- Although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment.
- As a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers. This issue has a greater impact on children from Black and other ethnic minority groups and children who are eligible for free school meals. Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small.
- Post-16 attainment in Haringey is improving but opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education.

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.
- Health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children.
- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).
- There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas.
- The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years to ensure essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives.
- Environmental issues are more concentrated in certain parts of the borough. For example, town centres are a particular focus for highway congestion and poor air quality. Some issues also impact more heavily in more deprived parts of the borough, with higher accident casualty rates in the East of the borough.

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.
- Housing need is high amongst certain groups of residents including those with the protected characteristics. For example, levels of homelessness are high amongst female lone parents.
- Homelessness is also high in the age group 16-24 and 25-44 compared to the expected profile from census data.
- Homelessness data indicates Black households approach as homeless at a level which is more than twice their representation in Haringey's population.
- Some protected groups also have high levels of housing need due to higher levels of vulnerability. Homeless acceptance due to mental or physical disability is higher than would be expected given the profile of disability in the 2011 census, indicating that disability may be a factor in causing homelessness for these groups of households.
- The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services.

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.
- Compared to London, Haringey has a similar proportion of 0-19 year olds, a higher working age population and a lower proportion of older people. Those aged 25-29 and 30-34 form the two largest groups in the borough.
- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and around 200 languages are spoken. Our population is the fifth most ethnically diverse in the country.

- Historically, Haringey has experienced a high level of population turnover. Most population turnover occurs by people moving into and out of other parts of the UK.

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.
- Improved access to services and facilities is key to ensuring equality of opportunity. Certain groups may suffer particularly from reduced activity, for example those less able to travel due to mobility issues or low income.
- Analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough. For example, the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area.
- Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands

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 roles¹⁴ (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.
- Labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities.

¹⁴ 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.

- There is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park. Unemployment and the proportion of young people who are NEET (Not in education employment or training) is higher in the east of the borough.

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.

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 Appraisals¹⁵ 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.

¹⁵ LB Haringey (2014) Conservation Area Character Appraisals [online] available at: <http://www.haringey.gov.uk/conservationareacharacterappraisals> (accessed 13/10/14)

- 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.
- Open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough.

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.
- 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 GLA¹⁶ 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 level¹⁷ 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.

¹⁶ 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)

¹⁷ 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)

- 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.

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.

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

As explained within Chapter 4 (What's the scope of the SA?), the SA process undertaken for the Haringey Local Plan has sought to integrate EqIA and HIA. Relevant issues have been considered through scoping work (i.e. through context and baseline review - see Appendix III; and establishment of the SA framework - see Chapter 4) and have fed into the appraisal of alternatives (see 'Part 1') and the appraisal of the draft plan (see 'Part 2'). The aim of this appendix is to summarise and 'signpost'.

- Community cohesion is an important broad issue, recognising that: almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with around 200 languages are spoken; and historically, Haringey has experienced a high level of population turnover. However, the Site Allocations DPD has relatively little effect in this regard, with the other plans set to have greater effects through policy on housing mix. Perhaps the most notable effects will result from the clear focus on delivering enhancements to the open space through the Site Allocations DPD. Other matters discussed under the community cohesion heading, as part of the appraisal of the draft plan ('Part 2' above), include efforts targeted at those who seek warehouse living.
- Health is an important broad issue, recognising that: health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years); there is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. Perhaps the most notable effects of the Site Allocations DPD relates to design of the urban realm and support for walking/cycling infrastructure, as discussed under the health, accessibility and sustainable transport headings within the appraisal of the draft plan ('Part 2' above).
- Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals); Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small; and whilst post-16 attainment in Haringey is improving. opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. However, the Site Allocations DPD has relatively little effect in this regard, as discussed under the 'education' heading within the appraisal of the draft plan ('Part 2' above).
- Crime is an important broad issue, recognising that: there is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation; young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery; and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence. As discussed under the 'crime' heading, as part of the appraisal of the draft plan ('Part 2' above), site specific policy is set to ensure that opportunities to design-out crime at certain sites are realised; however, the appraisal concludes that the plan might go further.
- Housing is an important broad issue, recognising that: housing need is high amongst certain groups of residents including those with the protected characteristics, e.g. levels of homelessness are high amongst female lone parents; black households approach as homeless at a level which is more than twice their representation in Haringey's population; some protected groups also have high levels of housing need due to higher levels of vulnerability, with homeless acceptance due to mental or physical disability higher than would be expected given the profile of disability in the 2011 census. The rate

and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services; however, the Site Allocations DPD has relatively little effect in this regard, with the other plans set to have greater effects through policy on Estate Renewal and housing mix. As discussed under the 'housing' heading, as part of the appraisal of the draft plan ('Part 2' above), there are relatively few examples of site specific policy set to prescribe the nature of the housing mix.

- Economic inclusion is an important broad issue, recognising that: labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics, e.g. the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities; and there is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. This is an important issue set to be addressed through all four plans, including the Site Allocations DPD, recognising the support for redevelopment of some existing employment areas. Employment density will be increased in the vast majority of cases, and will be significantly increased overall (i.e. across the borough); however, the nature of jobs available within the borough is set to shift, and there is a risk of disproportionate effects. It is noted that there is not set to be an explicit focus on skills and training, although it is recognised that planning has a limited role to play in meeting objectives in this respect.
- Environmental quality is an important broad issue, recognising that: the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with the protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality); environmental issues are more concentrated in certain parts of the borough, e.g. town centres are a particular focus for highway congestion and poor air quality, and there being higher accident casualty rates in the relatively deprived east of the borough; and open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough. Site specific policy is set to generic references (essentially signposts to DM policy) to the need to address air quality, noise and contamination issues, in areas where these issues are likely to arise. Notably, site specific policy is established at several sites adjacent to rail lines, in order to ensure noise mitigation.
- Accessibility is an important broad issue, recognising that: improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income); analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough, e.g. the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area. Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands, however, this is only set to be addressed through the plans at the current time to a limited extent, as work on the Infrastructure Delivery Plan (IDP) is still on-going, and it is through this plan that provision will primarily be made. Having said this, it is suggested that the Site Allocations DPD does perform well, as discussed under the 'accessibility' heading above (and other headings), given the considerable focus on enhancements to movement / permeability.

APPENDIX V - OFFICE USES IN WOOD GREEN

Introduction

Chapter 7 (within 'Part 1', above) presents summary appraisal findings in relation to the following alternatives for 'Office uses in Wood Green':

- **Option 1** – Reduction in office uses, despite high accessibility (PTAL)
- **Option 2** – Promotion of office uses prevalent, commensurate with high PTAL

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'. Also, '=' is used to denote instances where the alternatives perform roughly on a par.

Effects are predicted taking into account the criteria presented within Regulations.¹⁸ 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 that is outside the control of the Site Allocations DPD).

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.

¹⁸ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Option 1 should support a targeted approach to regeneration in Wood Green, leading to a situation whereby the town centre is vibrant '24/7', with positive implications for the achievement of crime objectives.	★1	2
Education	No notable implications.		
Health	No notable implications.		
Housing	Wood Green is an appropriate location for new homes, and therefore Option 1 performs relatively well.	★1	2
Community Cohesion	Option 1 should support a targeted approach to regeneration in Wood Green, leading to a situation whereby the town centre is vibrant and well used by a cross-section of the community. Significant effects are possible, but unlikely.	★1	2
Accessibility	Wood Green is highly accessible by public transport, and this situation is set to improve further given Crossrail 2. High PTAL means that town centre uses and community facilities should be encouraged with a view to ensuring good 'accessibility' for all members of surrounding communities, including the less mobile. There is likely to be the greatest opportunities to support town centre uses and community facilities under Option 1. Significant effects are possible, but unlikely.	★1	2
Economic Growth	The London Plan establishes that Wood Green is not a preferred location for office growth, and it is expected that development of Wood Green as a functioning and vibrant Town Centre with a clear civic role – through delivery of new homes and town centre uses (Option 1) – will support borough wide and sub-regional economic objectives in the long term. It is also the case that there is low market demand for office space in Wood Green. Significant effects are possible, but unlikely.	★1	2
Skills and Training	No notable implications.		
Economic Inclusion	It might be that new office space in Wood Green (Option 2) would lead to less need to increase the jobs density at existing employment sites (i.e. convert traditional employment floorspace into office space) with the effect that there is more potential for traditional employment sectors to thrive locally. However, this effect is highly uncertain. It is also important to note that, under Option 1, whilst Wood Green would not be a focus of office uses, there could (would) still be the potential for targeted measures to be taken to ensure delivery of employment space that is suitable for SMEs (affordable, flexible, etc.).	=	=
Town Centres	There are opportunities to enhance the function of Wood Green (the sole Metropolitan Town Centre in the Borough) through diversifying uses, which in practice means delivering a wide range of entertainment, leisure, and community facilities alongside new housing. Option 1 should support a targeted approach to regeneration in Wood Green, leading to a situation whereby the town centre can thrive and develop an offer that is distinct within the wider sub-region. Significant positive effects are predicted under Option 1. There is no reason to suggest that Option 2 would lead to significant negative effects, however.	★1	2

Topic	Discussion	Opt 1	Opt 2
Biodiversity	There are biodiversity related opportunities locally, and it might be the case that Option 1 will lead to more funds being made available to support conservation/ enhancement measures; however, this is uncertain and effects would be fairly negligible.		
Townscape and Cultural Heritage	Option 1 is best performing, on the assumption that increased footfall (and town centre ‘vibrancy’, more generally) is a positive from a heritage conservation perspective. There are issues around building heights in Wood Green, given important views not least to and from Alexandra Palace, but it is not clear that either option leads to implications.	★ 1	2
Open Space; Water Resources; Soil and Land Quality; Flood Risk and Climate Change; Air Quality; Noise; Energy and Carbon; and Waste Management: No notable implications.			
Sustainable Transport	It is generally accepted that offices - as locations where a large number of people will commute to and from – should be located in areas with high public transport accessibility. Option 1 is therefore preferable, although it is not clear that there would be significant effects, given that the baseline situation is one whereby there are many other highly accessible locations for office development in the borough.	2	★ 1
<p><u>Summary</u></p> <p>Option 1 (Reduction in office uses) performs best in terms of a range of sustainability objectives, stemming from the suggestion that this approach will support a targeted approach to regeneration in Wood Green, leading to a diversification of uses and a situation whereby the town centre is vibrant and has a clear role to play sub-regionally. It is not thought that a decision to reduce office space in Wood Green will have negative implications from an economic growth perspective, given that there are a number of other areas locally where demand for offices is high, and the effect of regeneration in Wood Green should be to enhance the image of Haringey in general as a place to do business and invest. The draw-back to Option 1 relates to ‘sustainable transport’ objectives; however, there are other locations with high PTAL that are set to be a focus of office development.</p>			

APPENDIX VI - HARINGEY WAREHOUSE DISTRICT

Introduction

Chapter 7 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for ‘Haringey Warehouse District’:

- **Option 1** – Allow a mix of uses including residential
- **Option 2** – Maintain as employment, reflecting employment designation

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

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Employment sites that are underused may attract crime and anti-social behaviour, which would suggest that opportunities should be taken to allow a mix of uses in some instances (Option 1).	★1	2
Education	No notable implications.		
Health	The current situation is one whereby there are issues around unauthorised warehouse living and poor living environments. It can be assumed that this situation would continue and worsen under Option 2, leading to significant negative effects.	★1	2
Housing	Under Option 1, non-conventional residential development (‘warehouse living’) will address a specific demand, and so is a positive in terms of housing objectives.	★1	2
Community Cohesion	Local residents have identified positives associated with having a creative community living nearby, and there are opportunities to capitalise on this under Option 1.	★1	2
Accessibility	PTAL is generally poor in this area, although it is not clear that there will be any notable implications. This reflects an assumption that residents will tend to be young and healthy adults.		
Economic Growth	Option 1 will support the creative industries and therefore likely lead to a diversification in the local economy of Haringey, albeit there will be some loss of traditional industries. It is assumed that, under Option 1, there would be no-net-loss of employment floorspace, and an increase in jobs density. Significant effects for the local economy of Haringey are possible, but uncertain.	★1	2
Skills and Training	It is anticipated that a creative hub will develop under Option 1, which could lead to opportunities around skills and training.	★1	2
Economic Inclusion	Option 1 will lead to a situation whereby the existing creative industries and SME sectors are supported and given room to grow; and the employment offer of sites is maximised. The net effect for traditional industrial uses would likely be negative; however, it is understood that there would be some instances under Option 1 where traditional industries can be supported.	?	?
Town Centres; Biodiversity; Townscape and Cultural Heritage; Open Space; Water Resources; Soil and			

Topic	Discussion	Opt 1	Opt 2
Land Quality; Flood Risk and Climate Change; Air Quality; Noise; Energy and Carbon; and Waste Management: No notable implications.			
Sustainable Transport	PTAL is relatively low for much of the Haringey Warehouse District, which would suggest that these sites are not suitable for intensification.	2	★1
<p><u>Summary</u></p> <p>Option 1 (Allow a mix of uses including residential, despite employment designation) is likely to lead to widespread benefits given existing issues around unauthorised warehouse living (not least around poor living environments) and the fact that supporting the creative sector is an important economic objective for Haringey. There are potentially some draw-backs – including those that relate to the loss of floorspace for traditional industries – but it is anticipated that policy measures can be put in place to mitigate effects.</p>			

APPENDIX VII - OPEN SPACE

Introduction

Chapter 9 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for ‘Open space’:

- Option 1 – Do not allocate sites for purely open space
- Option 2 – See to allocate sites for purely open space

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

Methodology

See discussion in Appendix V.

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Option 1 might lead to increased funds being made available for enhancements to existing open space, which will enable existing issues around crime / anti-social behaviour to be addressed.	★1	2
Education	No notable implications.		
Health	There are areas of open space deficiency locally, and either option could help to ensure that issues are addressed.	=	
Housing	Option 2 would certainly constrain the ability to deliver on the ambitious London Plan housing targets. Significant negative effects are predicted.	★1	2
Community Cohesion	No notable implications.		
Accessibility	Option 1 will enable efforts to be focused on increasing the role that existing open space can play in terms of connectivity. Significant positive effects are predicted.	★1	2
Economic Growth	Option 2 would certainly constrain the ability to deliver on the ambitious London Plan employment targets. Significant negative effects are predicted.	★1	2
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	No notable implications.		
Biodiversity	Either option could support target enhancements to local ecological networks, although it might be suggested that new open space would likely be geared towards recreational uses, as opposed to biodiversity.	=	
Townscape and Cultural Heritage	Either option could support target enhancements to open space that enhance views and the setting of heritage assets. There could be particular opportunities under Option 2 (new open space).	=	

Topic	Discussion	Opt 1	Opt 2
Open Space	The Open Space Study 2014 identified areas of open space deficiency, taking into account both existing deficiency and deficiency set to arise in the future given projected population growth. There is difficulty in increasing the quantity of public open space in Haringey as this is an urban borough, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. A Green Grid approach can ensure that the functional role of key assets within the network (e.g. Alexandra Palace Park, various areas of Metropolitan Open Land and SINCS) is enhanced. Option 1 has the potential to lead to significant positive effects, as does Option 2 (on the assumption that this approach would be deliverable).	=	
Water Resources	Either option could help to ensure that waterways are appropriately buffered, although it is likely that a Green Grid approach (Option 1) would lead to more widespread benefits.	★ 1	2
Soil and Land Quality	Either option could help to ensure that a targeted approach is taken to dealing with land that is contaminated; however, it is not clear that this would be a focus of policy in practice.		
Flood Risk and Climate Change	Either option could help to ensure that waterways are appropriately buffered, although it is likely that a Green Grid approach (Option 1) would lead to more widespread benefits.	★ 1	2
Air Quality	Either option could help to ensure that open space is used to buffer major roads, and polluting industry.	=	
Noise	As above.	=	
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	Either option could help to encourage open space to be used for walking and cycling, but it is expected that (Option 1) would lead to more widespread benefits, with significant positive effects predicted.	★ 1	2
<p><u>Summary</u></p> <p>There is difficulty in increasing the quantity of public open space in Haringey, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. Benefits of a Green Grid approach will be wide-spread, and hence 'significant positive effects' are predicted under a number of topic headings, most notably 'transport' and 'accessibility'.</p>			