

London Borough of Haringey

Core Strategy Sustainability Appraisal

Addendum to the Core Strategy Sustainability Appraisal

Assessment of Policy SP8 Employment Land Designations



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Assessment of Policy SP8 Employment Land Designations

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CONTENTS

1	Introduction	1
2	Background	1
	2.1 Haringey Core Strategy	1
	2.2 Sustainability Appraisal.....	1
3	Appraisal methodology	2
	3.1 SA Process.....	2
	3.2 Appraisal Methodology	2
4	Appraisal Findings	5
5	Conclusions and Recommendations	10

Appendix: SP8 Appraisal Matrix

1 Introduction

This Report is an Addendum to the Sustainability Appraisal (SA) of the Proposed Submission Core Strategy. It presents the findings of the re-appraisal of Strategic Policy SP8 and the proposed employment land designations. The SA of the Core Strategy Proposed Submission was completed in September 2010. The SA was revised to reflect the changes made to the Core Strategy in November 2010. The SA of the Submission Core Strategy (Ref: 5006-LN00993-LNR-01) (February 2011) assessed SP8. However, in light of further evidence on the borough's employment land, SP8 has been re-assessed against the SA Objectives. This is a strategy policy assessment and not a site assessment.

2 Background

2.1 Haringey Core Strategy

The Local Development Framework (LDF) is a suite of documents that will form the planning framework against which development applications will be assessed and other important decisions made. Haringey's Core Strategy is the spatial expression of the Community Strategy vision and sets out how the Council sees Haringey developing over the period up to 2026. Once adopted, it will guide all major development decisions and investment plans.

Following the Core Strategy Examination in Public which took place between 28th June and 7th July 2011, the Council considers it appropriate to undertake a revised consultation on some of the employment land designations included within the Core Strategy. An appraisal of the potential future role of 11 of the borough's DEAs was undertaken to feed into the emerging Core Strategy. The future roles considered were classified as follows:

- Opportunity for intensification and redevelopment within the existing employment area;
- Retention of employment uses with opportunities for greater flexibility in the range of uses particularly those which enable the retention or intensification of employment within the employment area; and
- Reclassification for mixed use development, including residential.

Haringey Council has identified a hierarchy of employment land, where certain types of employment uses should be concentrated. These employment areas vary in age, quality and size of buildings, access, and the nature of businesses within them.

The Submission Core Strategy includes SP8 which sets out the hierarchy of employment land. SP8 is included in the Appendix SP8 Appraisal Matrix on page 16.

2.2 Sustainability Appraisal

Under the Planning and Compulsory Purchase Act 2004 and Planning Policy Statement 12, the Local Planning Authority is required to carry out a Sustainability Appraisal (SA) of its LDF to fulfil the aim of contributing towards the achievement of sustainable development throughout the preparation of its plans. The SA is required to incorporate the requirements of the SEA Directive¹ which was transposed directly into UK law through The Environmental Assessment of

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

Plans and Programmes Regulations, 2004² (the SEA Regulations). The SEA Regulations and SA Guidance³ set out the statutory process that should be followed in undertaking the SA.

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

The SA work has been undertaken alongside the preparation of the Core Strategy Development Plan Document, which has allowed the SA process to be integrated into the plan-making process and improving the sustainability of the plan throughout the process.

3 Appraisal methodology

3.1 SA Process

This section provides an overview of the SA process followed during the preparation of the Haringey Core Strategy. A detailed Sustainability Appraisal Methodology is found in the SA of the Submission Core Strategy (Ref: 5005-LN00993-LNR-04) (May 2010) and should be referred to for further information.

The following is a summary of the process undertaken to date:

- **SA Scoping:** Sustainability appraisal objectives were developed based on a review of baseline conditions and relevant plans, policies and programmes. The SA objectives were finalised after consultations with the Council Officers and Statutory Consultees in 2007.
- **Options Assessment:** Appraisal of the Issues and Options Report
- **SA of the Preferred Options:** The SA Report appraised the Core Strategy Options in May 2009 and released for public consultation from May to June 2009.
- **SA of the Proposed Submission Core Strategy:** Following the changes to the Core Strategy as a result of the consultations, the Sustainability Appraisal of the Proposed Core Strategy, was issued for consultation from May to June 2010.
- **Revised SA of Proposed Submission Core Strategy:** Following the amendments to SP2, SP12 and Employment Designations, the SA was revised to take account of the changes. The Proposed Submission Core Strategy (revised) and the SA Report were issued for additional Regulation 27 consultation from November to December 2010.
- **Final SA Report:** Following the Regulation 27 consultation, the Final SA report was prepared in February 2011, which considered the changes to the policies. This report also documented the entire SA process.

3.2 Appraisal Methodology

In undertaking the appraisal of SP8 which includes the changes to employment designations, this appraisal has conformed to the methodology used in previous appraisals. The SP8 was appraised against the SA objectives as set out below:

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

³ PADS 2010 Sustainability Appraisal Advice Note. Available at: <http://www.pas.gov.uk/pas/aio/627078>

Table 3-1: Sustainability Appraisal Objectives

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

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

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

The appraisal considered the positive and negative impacts of the proposed changes to some of the employment land designations included within the Core Strategy. In addition, it was considered whether the potential impacts were likely to occur in the short, medium or long term. Due to the length of the plan period, at 15 years, these correlated to the following bandings:

- Short term 0-5 years
- Medium term 5-10 years
- Long term 10-15 years

The detailed appraisal matrix is presented in Appendix A of this report.

4 Appraisal Findings

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

- Emphasis on supporting local employment training schemes and local enterprise development.
- Reducing exclusion and deprivation by providing suitable employment opportunities for local people through a vibrant local economy.
- Protecting existing employment land uses is likely to ease pressure on greenfield sites for employment development.
- Environmental and local amenity improvements through modernisation of old stock, reuse/redevelopment of obsolete industrial sites to alternative uses.
- Encouragement of a variety of uses within the employment areas for industrial occupiers including walk to services such as crèches and cafes which will provide support for workers and local community.
- Focusing employment within land currently used for this purpose and on brownfield sites will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, while potentially bringing about some localised improvements to townscape where redevelopment occurs.

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

- Some industrial sites may have localised environmental impacts and distribution uses may generate freight/lorry traffic which will generate road traffic, air pollution and noise.

- There is potential for increased water consumption and pollution by business and industrial land use.
- Increased business and office developments have potential to increase energy use.
- The Friern Barnet site is a brownfield site, which is also a Site of Importance for Nature Conservation, with some known biodiversity value. Any development in the site therefore has potential to have biodiversity impacts.

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

The appraisal matrix for SP8 is included in the Appendix. The matrix is a combined assessment of the potential impacts of the proposals in the policy. The following section provides more detailed comment on the employment sites where changes in designation are proposed.

Bounds Green, N11

The proposal to change this land from being Employment Land (EL) to a Locally Significant Industrial Site (LSIS) will focus economic development in this area on industrial type uses. There may be some increase in medium to long term demands from commercial/industrial operations. The reclassification will ensure that economic development in the area is sustained, bringing about positive effects against the SA Objectives to reduce crime and improve health inequalities. Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs. Safeguarding this locally significant industrial site will contribute to the London wide framework of sites available in the west of the borough compared to the east.

Development would bring about some increase in greenhouse gas emissions from works and traffic movements, even where new development is itself energy efficient. As the site is an existing employment area, the extent to which water features will be affected is very limited. The site is currently well used, but at risk from over expansion of retail uses. The site has existing linkages with the local road network and is situated relatively close to good rail, bus and underground links.

Friern Barnet N10

The site is proposed to change from EL to LSIS and development of this site will contribute towards an improvement in the local economy and a reduction in anti-social behaviour and crime in the medium to long term through the provision of local jobs. Effective utilisation of vacant sites can also improve surveillance. Safeguarding this locally significant industrial site will contribute to the London wide framework of sites for industry, business and warehousing and will also help to address the imbalance of industrial sites available in the west of the borough compared to the east.

This site is currently designated for employment uses in the adopted Unitary Development Plan, 2006 and is also designated as a Site of Importance for Nature Conservation (SINC). The site has existing linkages with the local road network and is situated relatively close to good rail, bus and underground links. This site is a former sewage works and now vacant.

The site is described as a typically diverse wasteland site, with a high botanical diversity. Several uncommon plants and nationally scarce plants have been recorded here in the recent past. In addition, the site is adjacent to Metropolitan Open Land (MOL) and adjoins an Ecological Corridor and redevelopment of the site would have an indirect adverse effect in wildlife. There are also potential for impacts relating to landscape, biodiversity and water, which

should be assessed as part of the redevelopment of this site. There is a drainage culvert on the site, which is broken and currently no water flowing on the site but there may be potential to de-culvert it as part of any redevelopment.

Campsbourne N8

The reclassification of the site from a regeneration area (RA) to Local Employment Area (LEA) – EL will allow flexibility in terms of the type of economic development permitted at the site. This will contribute towards a reduction in unemployment in the medium to long term. Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs. Providing some facilities such as small scale “walk to” nurseries and cafes may create more social feel within this employment area and provide some social and psychological benefits to workers.

Any increase in density of development could produce higher traffic rates into and from the site. There would be some increase in greenhouse gas emissions even where new development is itself energy efficient.

This site is currently a well developed employment area, mostly used for uses which fall into the B classes and is surrounded by some residential use relating to the previous categorisation of the site as a regeneration area. The site has existing, but poor linkages with the local road network and is situated relatively close to good rail, bus and underground links.

High Road West, N17

The change of categorisation from Industrial Location (IL) to LEA-EL will encourage more diverse economic development within this area. This will benefit the local community and economy, and improve passive surveillance of the less well used areas of the site to the north.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs. As the site is an existing employment area, the extent to which water features will be affected is very limited.

This site is a developed employment area, mostly used for uses which fall into the B classes and is surrounded by residential uses. Some areas of the site are well underused. The site has existing linkages with the local road network.

Land to the west of Millmead/railway line N17

The change of categorisation from RA to LEA-EL will encourage more diverse economic development within this area (to the west), encourage further inward investment and improve availability of local jobs. This will contribute to a reduction in crime and health inequalities. Providing some facilities such as small scale ‘walk to’ retail, nurseries and cafes may create more social feel within this employment area and provide some social and psychological benefits.

Surrounding land uses are relatively low lying, however improved employment sites are likely to have a positive effect on townscape, especially where this leads to regeneration of run-down properties or vacant plots in the medium to long term.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs.

This site is currently a well developed employment area, mostly used for uses which fall into the B classes. There is an area to the east used for Sui Generis by Network Rail. The site has existing linkages with the local road network and is situated relatively close to good rail, bus and underground links. Within the western section there are a relatively large amount of units which are well underused, and the site has a large turnover for small businesses.

Queen Street N17

The change of categorisation from IL to LEA-EL will encourage more diverse economic development within this area and encourage further inward investment to reduce the level of vacant units. This will not only benefit the local community and provide additional jobs but also improve passive surveillance of the less well used areas of the site. This will contribute to a reduction in crime and health inequalities.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs.

Development would bring about some increase in greenhouse gas emissions from works and traffic movements. As the site is established, the potential to incorporate green industries and green practices will be limited.

This site is a developed employment area, mostly used for uses which fall into the B classes, but equipped for other uses. The site has an above average rate of vacant units. The site has existing linkages with the local road network.

Providing some facilities, for example, small scale 'walk to' services such as, nurseries and cafes may create more social feel within this employment area and provide some social and psychological benefits to workers.

South Tottenham N15

The change of categorisation from IL to LEA-EL will maintain and diversify employment within the area and contribute towards a reduction in unemployment. Safeguarding this site will provide benefits to the local economy and will contribute to the London wide framework of sites for industry, business and warehousing. This will not only benefit the local community and provide additional jobs but also improve passive surveillance of the less well used areas of the site. This will contribute to a reduction in crime and health inequalities.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs. However, development would bring about some increase in greenhouse gas emissions from the works and traffic movements

This site was previously classed as industrial land. There are very few vacant plots and the site is well utilised. The site has existing linkages with the local road network and is situated relatively close to good rail, bus and underground links.

White Hart Lane N17

The protection of this site through its designation as LEA -EL will maintain and diversify employment within the area and contribute towards a reduction in unemployment. Safeguarding this site will provide benefits to the local economy and provide additional jobs. This will also improve passive surveillance of the less well used areas of the site. This will contribute to a reduction in crime and health inequalities.

Development would bring about some increase in greenhouse gas emissions from works and traffic movements. Due to the site being highly occupied, there are unknowns related to air quality, climate change adaptation and economic growth. Air quality and other environmental aspects may therefore remain unchanged.

This site is a developed employment area, with a healthy mix of RA and B use classes. The site is well used and with very few units that are vacant. The site was previously classed as an industrial area and the site has existing linkages with the local road network.

Willoughby Lane N17

The change of categorisation from IL to LEA-RA will encourage more diverse economic development within this area and ensure sustained investment in the site to avoid a high level of vacant units arising. The re-categorisation of this site will potentially sustain a good level of investment at the site. The provision of small scale 'walk to' services for industrial occupiers such as workplace crèches or cafes has potential to contribute to social objectives. The inclusion of residential areas within the site will improve surveillance and this can contribute to a reduction in the fear of crime. This will contribute to a reduction in crime and health inequalities.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs.

Due to the site being highly occupied, there are unknowns related to air quality, climate change adaptation and economic growth. Air quality and other environmental aspects may therefore remain unchanged.

This site is a developed mixed use employment area, currently used for a variety of use classes including A1, A2, B1, C3 and Suit Generis. The site is well used and with very few units that are vacant. The site has existing linkages with the local road network and was previously classified as an industrial site.

Wood Green (northern area) N22

The protection of the site by changing its categorisation from RA to LEA-IL defines the area as a true employment site and will encourage more sustained economic activity within this area to avoid a high level of vacant units arising. This will contribute to a reduction in crime and health inequalities.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs.

Due to the site being fully occupied, there are unknowns recorded in relation to air quality, climate change adaptation and economic growth. Air quality and other environmental aspects may therefore remain unchanged.

Rangemoor Road/Herbert Road N15

The change of categorisation from RA to LEA-EL defines the area as a true employment site and will encourage more sustained economic activity within this area to avoid a high level of vacant units arising. This will contribute to a reduction in crime and health inequalities.

Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on the landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopment occurs. However,

development would bring about some increase in greenhouse gases from the works and traffic movements.

This site is a developed employment area, currently used for A and B use classes. The site has some units that are vacant. The site has existing linkages with the local road network and is situated relatively close to good rail, bus and underground links.

5 Conclusions and Recommendations

The designation of these sites is not significantly different to the situation under the UDP. The following general recommendations have been made to mitigate potential impacts and to enhance the employment land designations:

- Any new development should be in accordance with the full range of the Council planning policies and objectives.
- Implement Secured by Design requirements for new developments within the DEAs.
- Where possible employment opportunities should be made for local people.
- It is recommended that legal agreements put in place to provide contributions towards employment and training initiatives for staff and the community (for example through work experience or apprenticeships) where appropriate.
- Corporate Social Responsibility programmes are becoming increasingly popular to maintain strong relationships with the local community, and there may be potential for new investors within employment areas to build strong community links.
- Any environmental effects of detailed proposals are to be considered as part of EIA, a Landscape Design Strategy and a Low Water Strategy as supporting information at planning application stage, incorporating as a minimum townscape, biodiversity, air quality, water resources and quality, flood risk, drainage, traffic impacts and resource efficiency.
- New development within the employment sites should always consider opportunities to enhance biodiversity and generally contribute to creating a good quality and greener place to work.
- Regard should be had to other policies within the Core Strategy, including SP4 – Working towards a Low Carbon Haringey, SP 5 - Water Management and Flooding, SP13 -Open Space and Biodiversity and SP7 - Transport.
- Development should attempt to use the local rail network for any distribution/delivery requirements where feasible. The use of local transport links for staff travel to work should also be encouraged through travel plans and other incentives where possible.
- Site Waste Management should be a consideration during planning applications to ensure construction seeks to minimise waste and maximise resource efficiency
- Sustainable modes of transport should be a key consideration with any major regeneration of the DEA sites

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

- The Friern Barnet site has dual designation as discussed above. Any development should be undertaken with appropriate consideration for the ecology present. Mitigation such as translocation, design to avoid sensitive areas or creation of new habitat within another location in the borough may be necessary to ensure that the area can function whilst maintaining overall net balance of biodiversity in the borough.

- Enhancement should form part of proposals and mitigation should be required to seek no net loss of biodiversity, whilst improving any areas of potential contamination.
- Any effects of detailed proposals should be considered as part of EIA and Landscape Design Strategy with supporting information at planning application stage. It should be ensured that developments are checked for biodiversity potential and appropriate mitigation developed.

Appendix: SP 8 Appraisal Matrix

SP8 Appraisal Matrix

This Appendix presents the findings of the assessment of SP8 against the SA Objectives in a matrix format.

The following notation and terminology are used to show the results of the assessment.

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

Policy SP8 Employment

The Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas. The Council will:

- *Protect B use classes including light industry, logistics, warehousing and storage facilities to meet the forecast demand of 137,000m² up to 2026;*
- *Support local employment and regeneration aims;*
- *Support environmental policies to minimise travel to work;*
- *Support small and medium sized businesses that need employment land and space, and*
- *Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics.*

Strategic Industrial Locations

The Council will safeguard the following sites as Strategic Industrial Locations (SILs) as identified in the London Plan:

- *Brantwood Road, N17;*
- *Lindens/Rosebery Works, N17*
- *Marsh Lane;*
- *North East Tottenham; and*
- *Millmead.*

Locally Significant Industrial Sites

The Council will safeguard the following sites at Locally Significant Industrial Sites (LSIS) for a range of industrial uses (B1 (b), (c), B2 and B8) where they continue to meet demand and the needs of modern industry and business:

- *Crusader Industrial Estate, N15;*
- *Bounds Green Industrial Estate;*
- *Cranford Way, N8;*
- *Friern Barnet Sewage Works, N10; and*
- *Vale Road/Tewkesbury Road, N15.*

Local Employment Areas - these have been divided into two sub categories:

1. *Employment Land (EL) is land deemed acceptable for other employment generating uses that complement the traditional 'B' use classes, such as a small scale 'walk to retail', cafes and crèche/nursery.*

The following will be protected as employment land:

- *Campsbourne, N8;*
- *N17 Studios, 784-78 High Road, N17;*
- *High Road West, N17;*
- *Queen Street, N17;*
- *South Tottenham, N17;*
- *White Hart Lane, N17;*

- *Wood Green (northern area), N22;*
 - *High Road East, N17;*
 - *Land west of railway/Milmead SIL; and*
 - *Rangemoor Road/Herbert Road, N15.*
2. *Regeneration Area (RA) is the most flexible of the categories as it can include uses appropriate in a mixed use development, such as small scale ‘walk-to’ retail, community and residential uses. However, the approach to mixed uses in Regeneration Areas must have regard to London Plan policy 2A.8, so as not to encourage retail development outside of town centres. The following sites will be protected as Regeneration Areas:*
- *Hale Wharf, N17;*
 - *Tottenham Hale, N17; and*
 - *Willoughby Lane, N17.*

SA Objective	SP8 Employment				Commentary
	Score	Timeframe			
		ST (Short term)	MT (Medium term)	LT (Long term)	
1. To reduce crime, disorder and fear of crime.	+	✓	✓	✓	<p>Effects:</p> <p>Crime is relatively high across the borough. The protection of current employment sites under this Policy will maintain employment within the areas for business and contribute towards a reduction in unemployment in the medium and long term. Friern Barnet is currently an undeveloped employment area but will provide employment. With a reduction in unemployment in the borough, there is likely to be a reduction in anti-social behaviour and disorder.</p> <p>Providing local people with legitimate opportunities and improving the image of the area are likely to reduce crime in the long term. However, maintaining employment areas purely for business will restrict the amount of active time, which may encourage criminal activity outside office hours.</p> <p>Mitigation/Enhancement:</p> <p>Implement Secured by Design requirements for new developments</p>
2. To improve levels of educational attainment for all age groups and sectors of society.	0				<p>Effects:</p> <p>No obvious effects.</p> <p>Mitigation/Enhancement:</p> <p>SP16 Community Infrastructure will require planning obligations/legal agreements for contributions towards employment, educational facilities and training.</p>
3. To improve physical and mental health for all and reduce health inequalities.	+		✓	✓	<p>Effects:</p> <p>The protection of sites under policy SP8 will maintain employment within the area and contribute towards a reduction in unemployment in the medium to long term, which will contribute to a reduction in deprivation and positive health impacts and related social/psychological factors. Providing some small scale walk in services such as nurseries and cafes may create more social feel within these areas and provide some social and psychological benefits.</p> <p>Long term positive health impacts from employment opportunities and related social/psychological factors.</p> <p>Mitigation/Enhancement:</p> <p>Positive effect will depend on the additional opportunities created and the suitability and access to these afforded to local people.</p>
4. To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents.	0				<p>Effects:</p> <p>This policy is related to the protection of employment sites and therefore unlikely to affect housing stock. However, the Willoughby Lane Street Regeneration Area will incorporate some residential areas and will therefore contribute to this objective. Mitigation/Enhancement:</p> <p>N/A</p>

SA Objective	SP8 Employment				Commentary
	Score	Timeframe			
		ST (Short term)	MT (Medium term)	LT (Long term)	
5. To protect and enhance community spirit and cohesion.	+	✓	✓	✓	<p>Effects: In areas where development makes suitable jobs and retail/commercial facilities available locally, quality of life and pride in the area are likely to increase.</p> <p>Mitigation/Enhancement: Positive effect will depend on opportunities created being suitable and accessible to local people. If the positions are filled through in-migration of skilled workers from elsewhere, creation of new opportunities may fuel resentment among current residents. Legal agreements to provide contribution towards employment and training initiatives. . It should also be ensured that opportunities are supported with training initiatives for staff and the community (for example through work experience or training schemes) where appropriate. Corporate Social Responsibility programmes are becoming increasingly popular to maintain strong relationships with the local community, and there may be potential for new investors within employment areas to build strong community links...</p>
6. To improve access to services and amenities for all groups.	+/?		✓	✓	<p>Effects: This policy seeks to ensure a range of employment opportunities are accessible locally in the medium to long term. There will be some uncertainty whether employment opportunities and services will be suitable to residents near new developments. However, with the provision of small scale walk to services such as crèches, nurseries and cafes in those sites near residential areas such as Campsbourne, Willoughby Lane, High Road West, Land to the west of Millmead, and Queen Street, would be primarily for workers but there is potential for access to these amenities for nearby residents.</p> <p>Mitigation/Enhancement: Positive effect will depend on opportunities created and whether services provided will be suitable and accessible to local people.</p>
7. To encourage sustainable growth and business development across the borough.	++	✓	✓	✓	<p>Effects: Main aim of the policy is to provide opportunity for economic growth in the long term. Promoting diversification of the economy and supporting local enterprise development likely to improve resilience. Safeguarding these sites will provide benefits to the local economy and will contribute to the London wide framework of sites for industry, business and warehousing.</p> <p>Mitigation/Enhancement: Positive effect will depend on opportunities created will be suitable and accessible to local people. Promoting other forms of employment to complement existing ones may encourage economic investment.</p>
8. To develop the skills and training needed to establish and maintain a healthy labour pool.	+		✓	✓	<p>Effects: This policy aims to support training schemes for residents. It will seek development contributions for training purposes.</p> <p>Mitigation/Enhancement: Positive effect will depend on the suitability of training and employment initiatives.</p>

SA Objective	SP8 Employment				Commentary
	Score	Timeframe			
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9. To encourage economic inclusion.	+	✓	✓	✓	<p>Effects:</p> <p>This policy supports employment for industrial, businesses and manufacturing operations. The policy seeks to protect and enhance existing employment sites. The defined employment areas within the Central Leaside boundary, namely Brantwood Road, Linden's/Rosebury Works, Marsh Lane, North East Tottenham, and Millmead will be protected against redevelopment and retained for employment use. In addition, the Council makes a commitment to safeguard sites for a range of industrial and employment uses - Locally Significant Industrial Sites and Local Employment Areas. These will provide for some skilled and unskilled job creation, complementing other employment opportunities and reducing worklessness in the borough.</p> <p>There are particularly high unemployment rates in the eastern wards and heartland area of the borough. Northumberland Park has one of the highest levels of high unemployment. Employment opportunities in these areas, particularly in South Tottenham, are likely to contribute to economic inclusion in the medium to long term.</p> <p>Mitigation/Enhancement:</p> <p>Retain employment areas for employment use, particularly those in areas of high unemployment.</p>
10. To improve the vitality and vibrancy of town centres.	0				<p>Effects:</p> <p>The employment areas are primarily in industrial areas and not likely to contribute to the vitality of town centres.</p> <p>Mitigation/Enhancement:</p> <p>N/A</p>
11. To protect and enhance biodiversity.	-	✓	✓	✓	<p>Effects:</p> <p>Commercial development in most of the employment areas is not likely to have significant effects on biodiversity. However, in the case of Friern Barnet, the site has been designated as a Site of Importance for Nature Conservation (SINC); there will be potential impacts on biodiversity.</p> <p>The site is described as "a typically diverse wasteland site, with a high botanical diversity. Several uncommon plants include bee orchid (<i>Ophrys apifera</i>). The nationally scarce golden dock (<i>Rumex maritimus</i>) has been recorded here in the recent past. There are also good lists of birds and invertebrates."</p> <p>In addition, the site is adjacent to Metropolitan Open Land and adjoins an Ecological Corridor and any development could have indirect impacts on wildlife corridors.</p> <p>Development of this site should be undertaken with appropriate consideration for the ecology present. Mitigation such as translocation, design to avoid sensitive areas or creation of new habitat within another location in the borough may be necessary to ensure that the area can function whilst maintaining an overall net balance of biodiversity for the borough.</p> <p>Mitigation/Enhancement:</p> <p>Any effects of detailed proposals to be considered as part of EIA and Landscape Design Strategy with supporting information at planning application stage. It should be ensured that developments are checked for biodiversity potential and appropriate mitigation developed if species/habitats are identified</p>

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	Score	Timeframe			
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12. To protect and enhance the borough's townscape and cultural heritage resources.	+/-		✓	✓	<p>Effects:</p> <p>The policy aims to protect and enhance employment sites, encouraging higher density and mixed use development. Improved employment sites are likely to have a positive effect on townscape, especially where this leads to regeneration of run-down properties, especially within the Tottenham Hale area. Potential for negative effects during construction.</p> <p>Mitigation/Enhancement:</p> <p>Ensure that developments are of high quality design and meet the requirements of SP 11 – Design. Impact on townscape to be assessed in an EIA at planning application stage, if required.</p>
13. To protect the borough's landscape resources.	+/?				<p>Effects:</p> <p>Since the policy seeks higher density uses on existing sites and to transfer obsolete industrial sites to alternative uses, there is likely to be less pressure on open spaces for development of employment use. At the local level, the effect on landscape would depend on the design of developments. However, SP11 Design promotes high quality design, including high quality landscaping for development schemes.</p> <p>Mitigation/Enhancement:</p> <p>Any effects of detailed proposals to be considered as part of EIA or Landscape Design Strategy with supporting information during planning application stage.</p>
14. To protect and enhance the quality of water features and resources.	-/?	✓	✓	✓	<p>Effects:</p> <p>Increased economic activity is likely to increase water use and demands on water and waste water infrastructure, but effects not likely to be significant. Short term water demands during construction of developments and medium to long term demands of commercial/industrial operations. Potential for surface water pollution/run-off, especially during demolition and construction.</p> <p>There are no water bodies within the Friern Barnet site to protect but nearby water features in Hollickwood Park could potentially be affected.</p> <p>Mitigation/Enhancement:</p> <p>Low water strategy to be required with any applications. Planning and EIA requirements to require assessment of water use/drainage/pollution at more detailed stage. SP5 – Water Management and Flooding seeks to reduce water use in developments.</p>
15. To encourage the use of previously developed land.	++	✓	✓	✓	<p>Effects:</p> <p>The current employment areas will be maintained and redevelopment within some sites (Willoughby Lane, Campbourne, Bounds Green, RangemoorRoad/Herbert Road, Wood Green, White Hart Lane, South Tottenham and Queen Street). This encourages the use of previously developed land and reduces pressure on open spaces and greenfield land for development of employment uses. The Friern Barnet site is a former sewage works. This site can therefore be categorised as previously developed land. As such, the draft North London Waste DPD has identified the site as a potential site for waste management. However, ecology has taken over the site, creating a green area. Any redevelopment should consider the biodiversity value of the site.</p> <p>Mitigation/Enhancement:</p> <p>Any effects of detailed proposals to be considered as part of EIA with supporting information at planning application stage. Enhancement should form part of proposals and mitigation to seek to ensure no net loss of biodiversity, whilst improving any areas of contamination.</p>

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16. To adapt to climate change.	+/-		✓	✓	<p>Effects:</p> <p>Increased economic activity and more road traffic will increase greenhouse gas emissions even where new development is itself energy efficient. New development is also likely to increase surface water run-off. The Council makes a commitment to reducing and mitigating the negative effects of climate change by promoting green industries and green practices. For example, the Council will expect new large developments to incorporate CHP and other renewable fuels where possible.</p> <p>Mitigation/Enhancement:</p> <p>SP4 – Working towards a Low Carbon Haringey promotes energy efficiency of developments and energy to be met through renewable sources. SP 5- Water Management and Flooding requires incorporating SUDs for large developments. Developments in these sites should attempt to use the local rail network for any distribution/delivery requirements where feasible. The use of local transport links for staff travel to work should also be encouraged through travel plans and other incentives where possible.</p>
17. To protect and improve air quality.	-		✓	✓	<p>Effects:</p> <p>Increased economic activity and more road traffic will increase greenhouse gas emissions. Some sites have existing linkages with the local road network but the increase in traffic to and from the sites are likely to increase gas emissions, even if the new development is energy efficient.</p> <p>Mitigation/Enhancement:</p> <p>Developments in these employment sites should attempt to use the local rail network for any distribution/delivery requirements where possible. The use of local transport links for staff travel to work should also be encouraged through travel plans and other incentives where possible. EIA requirements to include air quality assessments.</p>
18. To limit climate change by reducing CO ₂ emissions.	+/-			✓	<p>Effects:</p> <p>Increased economic activity and more road traffic will increase greenhouse gas emissions. However, the Council makes a commitment to reducing and mitigating the negative effects of climate change by promoting green industries and green practices. For example, the Council will expect new large developments to incorporate CHP and other renewable fuels where possible.</p> <p>Mitigation/Enhancement:</p> <p>Developments in these employment sites should attempt to use the local rail network for any distribution/delivery requirements where feasible. The use of local transport links for staff travel to work should also be encouraged through travel plans and other incentives where possible. Consider energy efficiency in developments to reduce carbon emissions (SP4- Working towards a Low Carbon Haringey promotes energy efficiency of developments and energy to be met through renewable sources).</p>
19. To ensure sustainable use of resources.	0				<p>Effects:</p> <p>There is no clear link between the policy and the SA Objective. However, the Council will encourage industries that manage recycling and reuse of waste.</p> <p>Mitigation/Enhancement:</p> <p>Any effects of detailed proposals during construction and operation to be considered as part of EIA during planning application stage. Site Waste Management should also be considered during planning applications to ensure construction seeks to minimise waste and maximise resource efficiency.</p>

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20. To promote the use of sustainable modes of transport.	?				<p>Effects:</p> <p>The protection of the sites does not directly promote the use of sustainable modes of transport. Increased density of development and associated activity will produce higher traffic rates into and from the sites. Most of the sites have existing linkages with the local road network and situated relatively close to good rail, bus and underground links. Employment opportunities for local people may reduce the need to travel elsewhere but may also bring vehicular traffic in from other areas.</p> <p>Mitigation/Enhancement:</p> <p>Developments in the sites should attempt to use the local rail network for any distribution/delivery requirements where feasible. The use of local transport links for staff travel to work should be encouraged through travel plans and incentives where possible. Sustainable modes of transport should be a key consideration with any major developments of sites.</p>
<p>Conclusions</p> <p>On the whole this policy has a beneficial effect against the SA Objectives. Positively, it will provide for protection and enhancement of employment areas. This will contribute to reduction in crime, health inequalities and improvement in mental well being. Focusing employment within land currently used for this purpose will reduce the risk of wider impacts on landscape, biodiversity and greenfield land, whilst potentially bringing about some localised improvements to townscape where redevelopments occur. However, the development of Friem Barnet will have potential to impact biodiversity resources in this site.</p> <p>Positive and negative scores were recorded against the following SA Objectives relating to climate change, air quality and water resources, where there are potential improvements but some negative impacts may still occur without mitigation.</p> <p>Uncertainties</p> <p>Uncertainties were recorded against SA Objective 13 'To protect the borough's landscape resources' as the policy's effects on the landscape are deemed uncertain.</p> <p>Recommendations/Mitigation</p> <p>It is recommended that this policy should include a reference to ensuring that any new development is to be in accordance with the full range of the Council's planning policies and objectives. Any development should consider its impact on biodiversity, townscape and sustainable transport. The sites have the potential to encourage sustainable transport modes for staff and business/distribution requirements. There is also potential to engage employers with the local community to benefit skills and training and enhance community spirit.</p>					