



Haringey Council

# Sustainability Appraisal (SA) of the Tottenham AAP

## Interim SA Report

Published alongside the 'Preferred Option' consultation document

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## INTRODUCTION

## 1 BACKGROUND

- 1.1.1 URS is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Tottenham Area Action Plan (AAP) Development Plan Document (DPD); henceforth known as 'the Tottenham AAP'. Once adopted, the AAP will assist the delivery and implementation of significant development proposals for the Tottenham Hale Growth Area, the North Tottenham Growth Area and the Tottenham High Road Corridor and Seven Sisters Corridor Areas of Change.
- 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' issues<sup>1</sup>), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs is a legal requirement.<sup>2</sup>

## 2 SA EXPLAINED

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

## 3 THIS INTERIM SA REPORT

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

### Structure of this Interim SA Report

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

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

<sup>2</sup> 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).

<sup>3</sup> Directive 2001/42/EC

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

## 4 INTRODUCTION (TO PART 1)

4.1.1 This is Part 1 of the SA Report, the aim of which is to introduce the reader to the ‘scope’ of the SA. In particular, and as required by the Regulations<sup>4</sup>, this Part of the SA Report answers the following questions.

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

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

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

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

## 4.2 Consultation on the scope

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

4.2.2 As such, an SA Scoping Report was published for consultation in January 2014.<sup>6</sup> 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.

<sup>4</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>5</sup> 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.’

<sup>6</sup> The Scoping Report is available at: <http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps>

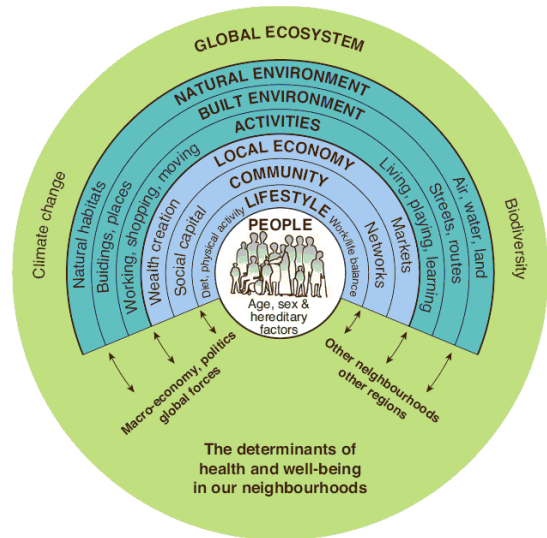
4.3 A note on ‘equalities’ and ‘health’ considerations

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

**Box 4.1: EqIA and HIA**

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

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



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



**5 WHAT IS THE PLAN SEEKING TO ACHIEVE?**

The SA Report must include...

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

5.1.1 The Tottenham AAP, once adopted, will assist the implementation of significant development proposals for the Tottenham Hale Growth Area, the North Tottenham Growth Area and the Tottenham High Road Corridor and Seven Sisters Corridor Areas of Change.

- 5.1.2 More specifically, the objective of the Tottenham AAP is to help deliver:
- More than 10,000 new high quality homes;
  - Over 5,000 new jobs created or accessed with almost a million square feet of employment and commercial space added;
  - A new district centre at Tottenham Hale;
  - A new civic hub and open space at Tottenham Green and a new gateway to Seven Sisters;
  - A reinvigorated and enhanced high street at Bruce Grove;
  - A new leisure destination at High Road West;
  - The long term regeneration of Northumberland Park Estate; and
  - An enhanced movement network across Tottenham that encourages a modal shift away from the car and improved linkages to Lee Valley Park.

5.1.3 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; London Plan (2011) and Further Alterations to the London Plan (FALP, 2014), 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.

**5.2 What’s the plan not seeking to achieve?**

5.2.1 The AAP is an aid to delivery and implementation of the priorities and proposals set out in London Plan and Strategic Policies DPD, and is therefore unable to change the overall location or scale of development at the higher strategic level. The AAP has value in that it can set the parameters for co-ordinated land assembly and proactive planning through compulsory purchase and planning policies which are responsive to the local area. It can also help to modify existing planning designations such as employment land and town centre designations which may be required to unlock the full potential of a place undergoing transformational change.

5.2.2 At the same time, the plan will be strategic in nature in that it will omit consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). Even the allocation of sites is a strategic undertaking. The strategic nature of the plan is reflected in the scope of the SA.

**6 WHAT'S THE SUSTAINABILITY 'CONTEXT'?**

The SA Report must include...

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

**6.1 Introduction**

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

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

6.1.2 Presented below is an updated summary of the context review presented in the Scoping Report (2014).

**6.2 Social**

**Crime**

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

**Education**

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

**Health**

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

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

#### Housing

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

#### Community cohesion

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

#### Accessibility

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

### 6.3

#### Economic

##### Economic growth

- The European Union strategy for achieving economic growth up until 2020 focuses on smart growth, through the development of knowledge and innovation; sustainable growth, based on a greener, more resource efficient economy; and inclusive growth.

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

#### Skills and training

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

#### Economic inclusion

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

#### Town centres

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

### 6.4 Environmental

#### Biodiversity

- The NPPF emphasises the need to protect important sites, plan for green infrastructure and plan for ecological networks whilst taking account of 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 city's '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 the 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 2008<sup>7</sup>. 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.

<sup>7</sup> 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.

#### Waste management

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

#### Sustainable transport

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

## 7 WHAT'S THE SUSTAINABILITY 'BASELINE'?

The SA Report must include...

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

### 7.1 Introduction

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

7.1.2 Presented below is an updated summary of the baseline review presented in the Scoping Report (2014). A more comprehensive (and fully referenced) review can be found within the SA Scoping Report.

### 7.2 Social

#### Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others. There are 52 neighbourhood crimes per 1,000 population in Tottenham, compared to 49.3 for Haringey.
- Crime is high in Tottenham compared to Haringey as a whole. Significant criminal activities in the ward include theft and handling and violence against the person.
- Crime is particularly prevalent in Northumberland Park. The challenge facing Tottenham, and the borough as a whole, is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

#### Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is above the London average (8.6%), but below the national level (9.3%). This is most acute in Tottenham Hale, with 22.45% of residents aged 16 and over having no qualifications.
- In 2013, 69% of the pupils who live and study in the Tottenham area achieved level 4+ at Key Stage 2, compared to 79% in London. This reduced to 56.4% in St Ann's. In 2013, 57% of pupils achieved 5 or more A\*-C at GCSE level, compared to 64.5% in London. This reduces to 50% in Seven Sisters.
- 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. None of the schools in Tottenham have sixth forms which may indicate low expectations in the young people of Tottenham.
- Tottenham does have outstanding rated schools and the primary school teacher of the year teaches in the area, but educational attainment is still below London levels. Educational



attainment is significantly lower than the London average across Haringey and is lowest in White Hart Lane, Northumberland Park and Seven Sisters (all in Tottenham).

- As the population grows additional school places will need to be created.

#### 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. However Tottenham has a lower life expectancy to London with it being only 74.7 years for men and 81.8 years for women in 2006 to 2010.
- 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. Male life expectancy is low compared to the Haringey average.
- Childhood obesity rates in the borough are higher than the London and national average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. In Tottenham this is even worse with 44.9% of 10-11 year olds in 2012/13 being either overweight or obese. About 112,865 adults in Haringey are estimated to be overweight or obese.
- There are high levels of deaths attributed to external causes and respiratory disease in Tottenham compared to Haringey. Cancer and cardiovascular disease rates amongst the under 75s are also high (17% and 35% above expected rates).
- There are a limited number of GP practices in some wards in Tottenham (White Hart Land and West green) and patients are likely to access primary care elsewhere. Access to GPs in Tottenham is significantly poorer in than in other parts of Haringey and the level of planned growth in Tottenham means a need for development of more health infrastructure.

#### 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 3,000 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).
- Overcrowding is a major issue with a fifth of all households with at least one bedroom too few for the number and composition of people living in the household. This increases to a quarter of all households in Northumberland Park.
- At just £25,138 per year, 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 annual household income for London.
- Tottenham has a population of 118,337 (2012 mid year estimate) which is projected to grow to approximately 147,000 by 2041. The area has a population density of 100.2 persons per hectare (2011), compared to 86.2 for Haringey and 54 for London as a whole. The borough's population is set to increase by 31,234 over the period 2011 to 2021.

### Community cohesion

- The 2011 Census showed that Haringey's population increased by 18% between 2001 and 2011. In Tottenham the population is currently 118,337, set to rise to 147,409 by 2014 according to the GLA Population Projections.
- Tottenham has a higher proportion of under 20s (28.1%) than Haringey (25.6%) and London as a whole (24.5%), suggesting an increased need for services aimed at mothers, children and young people. The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey in future.
- Tottenham is one of the most ethnically diverse areas in the country. A higher than average proportion of residents are from ethnic backgrounds; most notably Black Caribbean, Black African and Other White. Over three quarters (78.9%) of the population have non White British ethnic group, compared to 55.1% for London. There are some 200 different languages spoken.
- Overall deprivation in the borough is high, with Haringey ranked as the fourth most deprived borough in London. The eight wards that make up Tottenham (Northumberland Park, Tottenham Hale, Tottenham Green, White Hart Lane, West Green, Seven Sisters, St. Ann's and Bruce Grove) accommodate almost half of the people living in Haringey. They are ranked among the top 10% of the most deprived areas in England.

### Accessibility

- Education is highly accessible, with all 5-10 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 all 16-19 year olds within 30 minutes of further education.

## 7.3

### Economic

#### Economic growth

- When it is 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. Low wages act as a barrier to home ownership and limit residents' housing options.
- Through the London Plan, Tottenham has two regionally strategic industrial locations, one of which is a preferred industrial location (Central Leaside Business Area – North Tottenham) and the other an industrial business park located in Tottenham Hale. The regeneration of Tottenham Hale and the industrial areas in Central Leaside<sup>8</sup> offer new business and employment opportunities.
- For long periods Tottenham provided a home to light industry along the Upper Lee Valley but despite a number of active and well used industrial estates it now has, in broad terms, a declining employment base.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 people or less. Tottenham has the highest start-up rate of new businesses in London, despite the recent recession. 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.
- Research has indicated that economic growth within Tottenham will come primarily from small and medium sized B1 businesses, the creative sector and retail and leisure opportunities unlocked by the area's regeneration plans.

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<sup>8</sup> The regeneration area of Central Leaside is also partly in the London Borough of Enfield.

### Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles<sup>9</sup> (55.4%) across Haringey were higher than the London average (54.6%) and significantly above the national average (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.
- A high proportion of Tottenham residents are employed in low level jobs or are receiving benefits.

### Economic inclusion

- Tottenham has some of the highest levels of unemployment in London and England. In 2011, 63.7% of 16-64 year olds in Tottenham were in employment, below both the London and national 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 year olds). This is significantly above the national and London rates.
- Youth unemployment in Tottenham is particularly an issue with 5.4% of 18-24 year olds in the area claiming JSA, increasing to nearly 10% in Northumberland Park.
- High levels of unemployment and deprivation, along with a number of other factors, caused riots in Tottenham in the summer of 2011. This has led to a number of discussions on the prospects for the area's young population and in turn has triggered investment from the borough and the Mayor of London.
- In 2012/13 the median household annual income in Tottenham was £21,834, substantially below both Haringey (£33,140) and London (£35,740).

### Town centres

- Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The scale of the High Road has to a large part been an obstacle to creating a cohesive and distinctive High Street experience.
- 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. However Tottenham Hale was the best performing of Haringey's town centres with no vacant town centre floor space.
- 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.
- Tottenham's town centres need to be maintained and enhanced to retain retail capacity. Additional shopping and service facilities are needed in order to meet projected growth in expenditure.

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

## 7.4 Environmental

### Biodiversity

- Three European Sites are within a 10 km radius of Haringey – Lee Valley Ramsar Site, Lee Valley Special Protection Area (SPA) and Epping Forest Special Area of Conservation (SAC).
- The Borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance. Of these, five are of Metropolitan Importance, 22 of Borough Importance Grade I and Borough Grade II and 33 of Local Importance. Haringey also has five Local Nature Reserves (LNRs) - Alexandra Palace & Park, Coldfall Wood, Parkland Walk, Railway Fields and Queens Wood. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced.
- The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem. This area is home to European designated sites and is a Site of Special Scientific Interest. The River Lee Navigation and Pymmes Brook waterways also offer a habitat for wildlife. There are no designated Sites of Importance for Nature Conservation in Tottenham and much of the area generally lacks access to the natural environment.

### Townscape and cultural heritage

- The Tottenham High Road Historic Corridor comprises the following six Conservation Areas: North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green and South Tottenham. There are also three other Conservation Areas: Bruce Castle, St Ann's and Clyde Circus<sup>10</sup>. Tottenham also includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas.
- The North Tottenham Conservation Area is identified on English Heritage's Heritage at Risk Register as a conservation area at risk.

### Open space

- Tottenham has a small number of significant green spaces such as Down Lane Park and the Lee Valley Regional Park (designated as Green Belt) on the eastern boundary, although access is a significant problem. The borough has an overall provision of 1.7ha of open space per 1,000 residents. Areas deficient in access to public open space include Northumberland Park and Tottenham Hale wards and parts of Bruce Grove, Tottenham Green and Seven Sisters wards.

### Water resources

- Tottenham 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 modification of rivers including in-stream structures and culverts has led to loss of habitat diversity and the creation of barriers for fish migration.
- 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).
- Haringey 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

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

deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.

- Haringey-specific data is not available for water consumption however at the London level<sup>11</sup> the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

#### Soil and land quality

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

#### Flood risk and climate change

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

#### 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 north-east 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.

<sup>11</sup> 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)

- 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

- Tottenham has some of north London's best transport links with it only being 12 minutes on the tube (Victoria line) or train to central London. This is coupled with express rail services to Stratford, the City, Stansted Airport and Cambridge
- 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, town centres and residential areas. Transport links need to be improved to major employment opportunity areas outside of the borough including Stratford, Brent Cross and Stansted Airport.
- Transport for London has invested £20m into a major redevelopment of Tottenham Hale Tube, rail and bus station.
- Investment is also committed for £90 million for the Gospel Oak – Barking London Overground Line providing capacity and frequency improvements to south Tottenham, and £40 million for road improvements to unlock development sites near Tottenham Hale by dismantling the one-way gyratory system.
- Over half of Haringey households do not own or have access to 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.
- Tottenham's main road network is often congested with high flows of traffic on the A10 and A1010. Local resident streets are frequently heavily parked.
- Currently cycling only forms 2% of all journeys. Haringey has a target for a modal share by cycling of 5% by 2026. A local cycle route network including Quietways has been developed and Cycle Superhighway 1 runs through the area but more infrastructure is needed.

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

The SA Report must include...

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

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

Table 8.1: The SA Framework

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

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



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

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

9 INTRODUCTION (TO PART 2)

The SA Report must include...

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

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

- The spatial strategy for Tottenham
- Building heights / tall building clusters
- Employment sites
- Affordable housing
- The town centre hierarchy
- The Green Link

Reasons for focusing on these policy areas

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

9.1.3 Other policy topics besides those listed above could have been the focus of alternatives appraisal, but were not on the basis that it was unclear what value would be added. For many topics it is proportionate to develop a preferred policy approach on the basis of technical work and consultation, without formal alternatives appraisal. It is important to remember that:<sup>12</sup>

- In many instances DM policy will closely reflect the policy direction set out by the Strategic Policies DPD (which was developed alongside a process of Sustainability Appraisal). Further, borough-wide policies in the emerging DM Policies DPD will apply to the Tottenham area, and this Plan will also be subject to SA, with alternatives appropriately considered.
- The preferred approach to site allocations in Tottenham has developed through an iterative process that has involved systematic screening of site options and workshops to determine which sites to include in the preferred ‘site package’ and what the broad preferred use / policy approach should be (given deliverability / viability considerations). Following site screening, it is not clear that there is significant scope for further consideration of ‘reasonable alternatives’ in relation to the sites that are allocated, particularly in light of sites needed to deliver the preferred spatial strategy for the Tottenham AAP.
  - See Part 2 of the Site Allocations DPD Interim SA Report for a more detailed discussion of the methodology employed by the Council over 2013/14 when developing the preferred approach to site allocations.

<sup>12</sup> N.B. The Council remains open to suggestions regarding what should reasonably be the focus of alternatives appraisal. There is the potential to undertake further alternatives appraisal subsequent to the current consultation.

#### Structure of this part of the SA Report

9.1.4 Each of the six policy areas listed above is assigned a chapter, below. Within each chapter, the following questions are answered:<sup>13</sup>

- What are the reasons for selecting the alternatives dealt with?
- What are the appraisal findings (in relation to the set of alternatives in question)?
- What are the Council's reasons for selecting the preferred approach in-light of alternatives appraisal findings?

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<sup>13</sup> These questions reflect the regulatory requirement for the SA Report to present 1) appraisal findings for 'reasonable alternatives' and 2) 'an outline of the reasons for selecting the alternatives dealt with'.

**10 SPATIAL STRATEGY**

**10.1 Introduction**

10.1.1 The AAP more is than a collection of site and thematic policies – i.e. it establishes a broad spatial strategy for the area, balancing growth across several key areas. Thus it was considered necessary to consider alternatives in relation to this key policy issue.

**10.2 Reasons for selecting the alternatives dealt with**

10.2.1 Given the need to deliver a significant amount of housing in Haringey (a densely developed borough) over the plan period it is clear that options are somewhat limited. Tottenham Hale, Northumberland Park and High Road West clearly do need to be a focus of growth and change. This fact is reflected in the Council's preferred spatial strategy for the borough, which has been in place for some time.<sup>14</sup> This strategy also reflects the need to balance growth in Tottenham and therefore provides for additional, but more limited growth in the Seven Sisters, Tottenham Green and Bruce Grove areas.

10.2.2 However, it is nonetheless appropriate to give consideration to alternatives at the current time. Through initial discussions, it was established that alternatives to the preferred approach might be as follows -

- Allocate more growth to the northern edge of Tottenham (north of Northumberland Park), capitalising on synergies with the Enfield's transformative Central Leaside/Meridian Water mixed use development immediately adjacent to Haringey's northern border, with commensurately less growth to other areas.
- Allocate significantly more growth to Seven Sisters / Tottenham Green area, given existing rail and tube links and the planned Crossrail 2 station, with commensurately less growth to other areas.

10.2.3 Following further discussions, it was agreed that the first option is a reasonable alternative, whilst the second option is not. Whilst the Seven Sisters / Tottenham Green area has significant transport infrastructure (existing or planned) and will play a part in delivering future growth, the area is also heavily constrained and is therefore unlikely to be a suitable location for accommodating a significant amount of additional growth. Constraints include: the historic environment (conservation areas, area of archaeological search, statutory listed buildings); and urban fabric and prevailing building heights which generally do not readily lend themselves to tall buildings. In addition, there are a limited number of available sites; and fragmented site ownership, which would require complex land assembly measures and challenge deliverability.

10.2.4 In summary, the reasonable alternatives are as follows –

**Option 1 -** Growth focused mostly in Tottenham Hale, Northumberland Park and High Road West

**Option 2 -** As per (1), but with some emphasis on developing the northern edge of Tottenham

<sup>14</sup> The Tottenham AAP needs to assist in delivering the Council's regeneration objectives for the Tottenham area within the context of the Strategic Policies Local Plan, in particular, Table 3.1 which sets out the distribution of future housing growth for Haringey.

### 10.3 Summary appraisal findings

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

Table 10.1: Summary appraisal findings: Spatial strategy

Topic	Option 1 - Growth focused mostly in Tottenham Hale, Northumberland Park and High Road West	Option 2 - As per (1), but with some emphasis on developing the northern edge of Tottenham
Crime	1	1
Education	1	1
Health	1	1
Housing	1	1
Community Cohesion	1	1
Accessibility	1	1
Economic Growth	★1	2
Skills and Training	1	1
Economic Inclusion	★1	2
Town Centres	1	1
Biodiversity	1?	1?
Townscape and Cultural Heritage	1?	1?
Open Space	1?	1?
Water Resources	1?	1?
Soil and Land Quality	1	1
Flood Risk and Climate Change	1?	1?
Air Quality	1?	1?
Noise	1?	1?
Energy and Carbon	1?	1?
Waste Management	N/a	N/a
Sustainable Transport	1	1

#### Summary

The alternatives perform similarly in terms of a range of objectives, with equally significant positive impacts anticipated in terms of education, health, housing, community cohesion, accessibility, town centres, soil and land quality and sustainable transport. Option 1 was considered to perform best in terms of economic growth and economic inclusion. Option 2 would likely lead to a significant negative effect in this respect given the likelihood of this option necessitating re-designating Strategic Industrial Land (SIL).

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

- 10.4.1 The preferred option promotes a balanced approach to growth and development in Tottenham, in particular, a spatial scope that includes but also extends beyond North Tottenham. This option better reflects the Council's strategic regeneration objectives for the wider area, addressing local character and responding to constraints which might inhibit development of mixed and balanced communities, and taking advantage of key public transport nodes and other existing and future planned infrastructure / investment. In addition, Option 2 would require the de-designation of strategic industrial land, which, as the appraisal indicates, is likely to have significant negative effects on economic sustainability objectives. The preferred option is therefore also better placed to accommodate the quantum of planned future growth without compromising local business and employment opportunities, which are integral to Tottenham's sustainable development.

**11 EMPLOYMENT SITES**

**11.1 Introduction**

11.1.1 Tottenham is home to some important designated employment locations and the future development of these sites is a strategic issue. Whilst safeguarding land for employment is important to support and promote economic development, there is significant pressure to accommodate other land uses in the area, including for housing, along with development viability issues in certain employment locations.

**11.2 Reasons for selecting the alternatives dealt with**

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

11.2.2 The following alternatives have been appraised:

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

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

**11.3 Summary appraisal findings**

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

Table 11.1: Summary appraisal findings: Employment sites

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



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

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

11.4.1 There is a need to ensure that Tottenham’s employment land is maximised for the benefit of the local community and borough. Fully employment led schemes may be difficult to deliver in certain circumstances, given viability considerations. Therefore, an approach which enables the introduction of more viable mixed use development to cross subsidise employment development is preferred. This approach will assist with driving forward regeneration in the area, with multiple benefits for the area. The policy will be delivered through a limited number of site allocations, in order to ensure that employment locations and floorspace are not compromised. The policy will also work in conjunction with the DM Policies DPD.

## 12 TOWN CENTRE HIERARCHY

### 12.1 Introduction

12.1.1 Setting policies for Tottenham’s town centres is a key issue for the AAP given the need to maintain and enhance the role of these centres. As such, the Council recognised that it was appropriate to consider alternatives.

### 12.2 Reasons for selecting the alternatives dealt with

12.2.1 Haringey’s Strategic Policies DPD sets out the borough’s town centre hierarchy. Maintaining and reinforcing this hierarchy is the baseline position and should therefore be appraised. However, another option which includes a new District Centre at Tottenham Hale, within the existing hierarchy, is also a reasonable alternative. This option reflects the significant amount of growth planned for Tottenham Hale and need to appropriately support this with complementary town centre uses; in addition, the Further Alterations to the London Plan indicates potential for a future centre at Tottenham Hale and the option is in line with regional policy.

12.2.2 The following alternatives have been appraised:

**Option 1** - Retain / reinforce the existing town centre hierarchy, along with designating a new district centre at Tottenham Hale.

**Option 2** - Retain / reinforce existing town centre hierarchy

### 12.3 Summary appraisal findings

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

Table 12.1: Summary appraisal findings: Town centre hierarchy

Topic	Option 1 - Retain/ reinforce the existing town centre hierarchy and designate a new district centre at Tottenham Hale	Option 2 - Retain / reinforce existing town centre hierarchy
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	N/a	N/a
Community Cohesion	★1	2
Accessibility	★1	2
Economic Growth	★1	2
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a

Topic	Option 1 - Retain/ reinforce the existing town centre hierarchy and designate a new district centre at Tottenham Hale	Option 2 - Retain / reinforce existing town centre hierarchy
Town Centres	★1	2
Biodiversity	N/a	N/a
Townscape and Cultural Heritage	★1	2
Open Space	★1	2
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	2	★1
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	★1	2

### Summary

Option 1 is the preferred option. It would lead to a range of positive effects, including significant positive effects on: economic growth, town centres and townscape, including by promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration. Development of the district centre will also have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area.

Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough at little or no risk (Zone 1). Development of the Tottenham Hale district centre will need to have regard to the flood risk, but it is considered that this can be addressed through establishing requirements for flood resilience and resistance measures.

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

- 12.4.1 The preferred option is to maintain and reinforce the existing town centre hierarchy, along with the introduction of a new District Centre at Tottenham Hale. This option will help to ensure that the future growth and regeneration of Tottenham Hale is appropriately supported, whilst reinforcing the need to maintain the vitality and viability of Haringey's other existing centres. Existing and future transport improvements will also support the delivery of this alternative. Further, the option better positions Haringey to realise the potential of Tottenham Hale within London's wider town centre network, as reflected in the Further Alterations to the London Plan. The Sustainability Appraisal highlights the significant positive effects of progressing this approach, particularly on the objectives for economic growth, townscape / cultural heritage and sustainable transport.

**13 BUILDING HEIGHTS**

**13.1 Introduction**

13.1.1 The London Plan requires boroughs to identify suitable locations for tall buildings and to identify these in Development Plan Documents (DPDs). Tall buildings can contribute to wider strategic objectives for regeneration and economic development, for example, by helping to maximise the use of land, including for new housing. Tall buildings can have very significant impacts, due to their size and high visibility. As such, the Council recognised that it was appropriate to consider alternatives.

**13.2 Reasons for selecting the alternatives dealt with**

13.2.1 Haringey's Strategic Policies DPD includes relevant design criteria for tall buildings, and the emerging DM Policies DPD proposes additional policies. These plans make up a baseline policy option that should be considered. However, there is an opportunity to set more specific requirements for the AAP and therefore an alternative option should be considered; this applies the baseline option, with added flexibility for the identification of specific sites and areas suited for tall buildings.

13.2.2 The following alternatives have been appraised:

**Option 1 -** A locally specific approach to building heights, including tall buildings, in the Tottenham AAP; reflecting a more proactive approach to sensitive clustering of buildings in identified sites or areas (informed by Characterisation Study).




**Option 2 -** Apply more borough-wide development management policies for tall buildings (including in Strategic Policies DPD and DM Policies DPD).

**13.3 Summary appraisal findings**

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

Table 13.1: Summary appraisal findings: Building heights

Topic	Option 1 - A locally specific approach to building heights, including tall buildings	Option 2 - Apply borough-wide development management policies for tall buildings
Crime	N/a	N/a
Education	N/a	N/a
Health	N/a	N/a
Housing	1	1
Community Cohesion	N/a	N/a
Accessibility	N/a	N/a
Economic Growth	1	1
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a

Topic	Option 1 - A locally specific approach to building heights, including tall buildings	Option 2 - Apply borough-wide development management policies for tall buildings
Town Centres		2
Biodiversity	N/a	N/a
Townscape and Cultural Heritage		2
Open Space	N/a	N/a
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport		2

#### Summary

When considering the acceptable heights of new buildings it is necessary to consider the need to respond to, and where possible help to define, the surrounding character, as well as the need to make the most of opportunities for intensification and regeneration.

The locally specific approach to building height requirements would give a greater level of control/clarity over tall building location and design, with positive effects on selected town centres; protection and enhancement of townscape character and quality; and use of sustainable transport modes (by focusing these high trip-generating developments in locations that are highly accessible by public transport). Both options would contribute to housing delivery and economic growth. No significant effects were identified.

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

- 13.4.1 The preferred approach is for a specific tall building policy for the Tottenham AAP, to be considered via site allocations, building on relevant adopted and emerging Local Plan policies. This policy option will provide greater level of control over tall buildings in Tottenham, helping to ensure they make a positive contribution to the area by being appropriately situated, in particular, responding to local character and situated in areas with good transport accessibility. The policy will also provide greater certainty for prospective developers about the locations where relevant proposals will be acceptable.

## 14 AFFORDABLE HOUSING

### 14.1 Introduction

14.1.1 The Council recognises the importance of delivering affordable housing to meet local need and as part of creating more balanced and mixed communities. There is an opportunity to assist in delivering this through more locally specific approach to affordable housing tenure split in Tottenham. Therefore the Council recognised that it was appropriate to consider alternatives relating to affordable housing tenure splits.

### 14.2 Reasons for selecting the alternatives dealt with

14.2.1 The proposed alterations to the Strategic Policy SP2 along with emerging DM Policies DPD provide a baseline position for the borough on affordable housing tenure split that should be considered for the AAP. Recognising the need to re-balance housing provision in Tottenham, particularly with the comparatively higher levels of social rented accommodation, a variation on the baseline is proposed as an alternative option.

14.2.2 The following alternatives have been appraised:

**Option 1 -** Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 60% intermediate housing (housing available at prices and rents above those of social rent but below market prices or rents) and 40% social/affordable rented housing (as per the AAP housing policy).

**Option 2 -** Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 40% intermediate and 60% social/affordable rented (as per the proposed alterations to Strategic Policy SP2 and policy DM19 of the emerging Development Management Policies).

### 14.3 Summary appraisal findings

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

Table 14.1: Summary appraisal findings: Affordable housing

Topic	Option 1 - Apply affordable housing tenure split at 60% intermediate and 40% social/affordable rented	Option 2 - Apply affordable housing tenure split at 40% intermediate and 60% social/affordable rented
Crime	N/A	N/A
Education	N/A	N/A
Health	N/A	N/A
Housing	★ 1	2
Community Cohesion	?	?
Accessibility	N/A	N/A
Economic Growth	★ 1	2
Skills and Training	N/A	N/A

Topic	Option 1 - Apply affordable housing tenure split at 60% intermediate and 40% social/affordable rented	Option 2 - Apply affordable housing tenure split at 40% intermediate and 60% social/affordable rented
Economic Inclusion	N/A	N/A
Town Centres	N/A	N/A
Biodiversity	N/A	N/A
Townscape and Cultural Heritage	N/A	N/A
Open Space	N/A	N/A
Water Resources	N/A	N/A
Soil and Land Quality	N/A	N/A
Flood Risk and Climate Change	N/A	N/A
Air Quality	N/A	N/A
Noise	N/A	N/A
Energy and Carbon	N/A	N/A
Waste Management	N/A	N/A
Sustainable Transport	N/A	N/A

#### Summary

Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability, with very high levels of people living in temporary accommodation and newcomers often leaving the area once they have established themselves more economically. The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling). Both options would support positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 would provide more intermediate accommodation and therefore would have a greater positive impact in terms of rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. However, Option 1 might lead to more marked changes on the existing make up of the local area, potentially with implications for 'community cohesion' related objectives. It is important to note that the public consultation conducted on broad proposals for Tottenham (January 2014) highlighted concerns about the impacts of area change, including on housing affordability. The Council should consider means to monitor and if necessary mitigate impacts of development..

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

- 14.4.1 The preferred option is for a localised policy which is a variation on the emerging borough-wide policy for affordable housing tenure split. This option will assist in rebalancing the comparatively high levels of social rented accommodation in Tottenham, which equates to more than 60% of the boroughs' total social rented stock. It will ensure the most effective use of the funding received to help meet housing needs in Tottenham. Whilst the Sustainability Appraisal has identified potential issues in respect of area change, it is considered that the full suite of Local Plan policies will help to increase the quantum, range and quality of housing in Tottenham to better meet a wide range of housing need. Further, increasing the amount of intermediate housing will meet the needs of those who traditionally may have sought social housing but are eligible for low cost home ownership products, which the Council is seeking to encourage in Tottenham. Finally, Local Plan policies should not result in a net loss of affordable housing floorspace, in line with Strategic Policy SP2 and the emerging DM Policies DPD.

## 15 GREEN LINK

### 15.1 Introduction

15.1.1 The aspiration for a new green link in Tottenham, connecting to the Lea Valley Regional Park, has been set out in various key plans and strategies in recent years. The Tottenham AAP offers an opportunity to assist in facilitating delivery of the Green Link and therefore the Council is exploring options in this regard.

### 15.2 Reasons for selecting the alternatives dealt with

15.2.1 In order to improve permeability throughout Tottenham and improve access to the Lea Valley Regional Park, a Green Link should be situated where connections are not already well established. Given the significant future development at Tottenham Hale, along with site opportunities to facilitate delivery, an option should be considered in this local area. An alternative is to consider an approach which might optimise access to Down Lane Park, with connection to the High Road closer to Bruce Grove.

15.2.2 The following alternatives have been appraised:

**Option 1** - A Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area.

**Option 2** - A Green Link between Tottenham High Road and the Lea Valley Regional Park along Dowsett Road and Park View Road.

### 15.3 Summary appraisal findings

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

Table 15.1: Summary appraisal findings: Green link

Topic	Option 1 - A Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area	Option 2 - A Green Link between Tottenham High Road and the Lea Valley Regional Park along Dowsett Road and Park View Road
Crime	N/a	N/a
Education	N/a	N/a
Health	1	1
Housing	N/a	N/a
Community Cohesion	1	1
Accessibility	1	2
Economic Growth	N/a	N/a
Skills and Training	N/a	N/a
Economic Inclusion	N/a	N/a
Town Centres	N/a	N/a
Biodiversity	1?	1?



Topic	Option 1 - A Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area	Option 2 - A Green Link between Tottenham High Road and the Lea Valley Regional Park along Dowsett Road and Park View Road
Townscape and Cultural Heritage	N/a	N/a
Open Space	?	?
Water Resources	N/a	N/a
Soil and Land Quality	N/a	N/a
Flood Risk and Climate Change	N/a	N/a
Air Quality	N/a	N/a
Noise	N/a	N/a
Energy and Carbon	N/a	N/a
Waste Management	N/a	N/a
Sustainable Transport	★ 1	2

### Summary

Tottenham has very limited access to the Lee Valley Regional Park due to the barriers created by the railway line, large roads and waterways. Both options would seek to greatly improve east-west links to the park by creating attractive new walking and cycling routes. Consequently both options would have significant positive impacts on the sustainable transport and accessibility objectives, with option 1 judged to have the greater positive impacts as it creates a new route linking with Tottenham Hale.

Both options are also anticipated to have indirect positive impacts on health and community cohesion as a result of use of these routes, and increased access to the Lee Valley Park, by a wide section of the local population.

The extent to which both options would actually create new open space is unclear at this stage. The effects on biodiversity are also uncertain; the Green Link will include high quality landscaping that could create some biodiversity value and allow it to act as a wildlife corridor; it will also markedly improve access to wildlife and open green spaces. However, both options would increase the number of people using the Lee Valley Park, with potentially negative impacts on local ecology if visitor impacts are not carefully managed (e.g. within the Paddock Community Nature Park and Tottenham Marshes). The Council will need to work with Lee Valley Park to ensure that the potential negative impacts on biodiversity of increased use of the park can be managed effectively.

There may be scope to design the Green Link to act a sustainable drainage system, collecting, attenuating and treating rainwater runoff before discharging – subject to sufficient treatment – into the waterway. This could help to mitigate surface water flood risk and add amenity and biodiversity value to the Green Link, if there is sufficient space. The Council should consider the scope for integrating SUDS features into the Green Link as the design is developed.

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

- 15.4.1 The preferred option is for the introduction of a new Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area, passing across the northern section of the new District Centre and extending east of the axis of Chesnut road. This option will help to promote a more balanced approach to connectivity across the AAP area, with improved permeability to the Lea Valley at the southern part of Tottenham. Further, the alternative option is likely to be more difficult to deliver, with the Green Link having to address access across the A1055. With the preferred option, Chesnut Road already provides the area with a pedestrian route towards Tottenham High Road. The proposed Green Link extends the axis of this existing route directly east into the Regional Park.

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

**16 INTRODUCTION (TO PART 3)**

The report must include...

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

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

**17 APPRAISAL OF THE DRAFT PLAN**

**17.1 Methodology**

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

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

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

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

17.1.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.<sup>15</sup> 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 (e.g. the Meridian Water large scale regeneration project just over the borough boundary in neighbouring Enfield). These effect 'characteristics' are described within the appraisal as appropriate..

**17.2 Crime**

17.2.1 Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. Essentially, issues relate to designing development that reduces levels of crime and the fear of crime as well as levels of anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.

<sup>15</sup> Environmental Assessment of Plans and Programmes Regulations 2004

- 17.2.2 There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities.
- 17.2.3 There are no references to crime in the **neighbour area sections**. However as noted above the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Given that crime is particularly high in Northumberland Park and Tottenham Hale it is suggested that this issue should be explicitly addressed in these sections.
- 17.2.4 In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. However the significance of this effect is uncertain.
- 17.2.5 Given that crime is a bigger problem in Tottenham than the rest of the borough, with 52 neighbourhood crimes per 1,000 population compared to 49.3 for Haringey, it is suggested that the plan should go further in addressing this issue, for example by setting out an overarching policy requiring that the design of new and altered buildings or areas reduces the vulnerability of people and property to crime by ‘designing out’ opportunities that may be provided inadvertently by the built environment. The plan could highlight key design principles that should be demonstrated such as enhancing activity and creating ‘eyes on the street’/overlooking; good lighting; avoiding creating ‘hidden’ or ‘left over’ spaces; establishing clear boundaries between public and private space. Expected security features (e.g. electronic security systems, CCTV) could also be specified.

### 17.3 Education

- 17.3.1 There is a need to increase participation and attainment in education for all, not least by improving the provision of and access to education and training facilities. School attainment in the area is significantly below the London average, with children and young people who live in the more deprived areas of Haringey tending to have a lower level of achievement than those from more affluent backgrounds. As the population grows more school spaces will need to be created.
- 17.3.2 Part of the **spatial vision** for Haringey is that “new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough”. Education and training are not addressed in the AAP overarching policies, but community infrastructure provision is addressed by policies in the emerging DM Policies DPD.
- 17.3.3 The emerging DM Policies DPD sets out a policy on securing access to jobs and training, including apprenticeships and work experience placements. The council should consider introducing more locally specific requirements in the AAP, including site specific requirements for facilities, to strengthen performance against the education objective.
- 17.3.4 With regards to **neighbourhood areas**, it is noted that:
- The Tottenham Hale section includes an objective to designate sites for significantly improved community facilities including a new all form entry school. Two sites for education provision includes a new through-school are identified.
  - The North Tottenham section highlights the need for enhanced education facilities commensurate with the growth in forecast population and identifies a site for a ‘learning and education hub’ and two further sites for improved education provision.

- Seven Sisters and Tottenham Green neighbourhood area already has important cultural and education provision and this section identifies a site for new 'employment/education uses' as well as opportunities for education events on Tottenham Green.

17.3.5 Part of the spatial vision for Haringey is that "new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough". A strategic objective of the AAP is to provide 'world class' education and training.

17.3.6 **In conclusion**, the plan is likely to result in a positive effect on the education baseline given the focus on improving provision of education facilities. However the plan could be strengthened by expanding on these requirements further and explaining how existing provision will be improved.

17.3.7 Careful monitoring and coordinated planning will be required to ensure that sufficient new education infrastructure is brought forward in a timely manner to support the significant level of residential development planned for. In the neighbourhood areas section of the AAP clear identification of specific sites appropriate for educational uses may help to support delivery.

## 17.4 Health

17.4.1 There is a need to improve access to health services, extend life expectancy and improve wellbeing, including by increasing access to open spaces and sports facilities. High levels of deprivation in the area are linked to health and wellbeing challenges e.g. high rates of obesity. Large numbers of hot food takeaways in parts of Tottenham are identified as having a potential negative impact on health and wellbeing. Access to GPs is significantly poorer in than in other parts of Haringey and the level of planned growth in Tottenham means a need for development of more health infrastructure.

17.4.2 A **strategic objective** of the AAP is to provide 'a strong and healthy community' through measures such as improved health care provision, the creation of a green grid, increasing the supply of energy-efficient homes. The regeneration policy picks up on this theme by requiring that development proposals demonstrate how they have capitalised on opportunities to reduce social inequalities in Tottenham, improve the quality and supply of housing to meet housing needs and improve health and wellbeing.

17.4.3 With regard to **neighbourhood areas**, the North Tottenham neighbourhood area section highlights the need for new primary health facilities and identifies two sites for such provision. The Tottenham Hale section includes an objective to designate sites for significantly improved community facilities including a new large GP surgery of 1500-2000sqm in size. One site is identified that *could be* suitable for a new health centre. This section could be strengthening by clearly confirming which site is allocated for the provision of new primary health facilities; this is important given the need to accommodate in the short to medium term the existing and increased demand as such services as the area develops and the population expands.

17.4.4 **In conclusion**, the plan is likely to result in **significant positive effects** on the health baseline as a result of the strong emphasis on increasing and improving primary care provision as well as attention to wider determinants of health such as improved access to open space and encouragement of active travel. Such positive effects will be reinforced through implementation of policies in the Development Management Policies, for example the policy controlling hot food takeaway locations.

17.4.5 Careful monitoring and coordinated planning will be required to ensure that sufficient new infrastructure is brought forward in a timely manner to support the significant level of residential development planned for. Health service and sports facilities should be located at sites highly accessible by walking, cycling and public transport wherever possible.

## 17.5 Housing

- 17.5.1 The issues relate to providing greater choice, quality, quantity and diversity of housing across all tenures to meet the needs of residents. This includes refurbishing existing stock (many existing homes do not meet required standards of decency) as well as developing new supply. The aim is to create more mixed communities that have a balance of different types of housing which offer quality, affordability and sustainability (Haringey’s Housing Strategy 2009-19).
- 17.5.2 Affordability of housing is a significant issue in the area. Over 60% of all social housing in the borough is located in the Tottenham wards and 36.9% of the population in Tottenham live in this housing. High levels of homelessness and overcrowding are also key issues.
- 17.5.3 The AAP aims to deliver 10,000 new homes over the period to 2026, including through the potential designation of Tottenham as a Housing Zone. A **strategic objective** is to create a different kind of housing market that provides a range of high quality housing at a range of prices and tenures.
- 17.5.4 With regard to **overarching policies**, the regeneration policy requires development proposals to demonstrate how they have improved the quality and supply of housing to meet housing needs. The housing policy repeats the 10,000 homes target and the aim of contributing to mixed and balanced communities. It clarifies requirements with regards to affordable housing, densities and viability.
- 17.5.5 All of the **neighbourhood areas** involve residential development. The neighbourhood area sections highlight indicative capacities for the number of homes to be provided on key sites as well as specific design requirements.
- 17.5.6 **In conclusion**, the plan is likely to result in **significant positive effects** on the housing baseline. In particular, the delivery of large scale growth in housing and the strong emphasis on affordability and diversity of housing to meet local needs will contribute to these effects.
- 17.5.7 Large scale regeneration will likely positively transform the area over time as housing quality and the wider environment is improved. Whilst the Plan’s housing policies aim to create more stable, mixed and balanced neighbourhoods over the long term, development consistent with the plan policies may bring some disruption to existing communities. The council should consider how impacts of area regeneration can be monitored and where necessary mitigated, for example, by monitoring delivery of housing and housing affordability.
- 17.5.8 Careful monitoring and coordinated planning will be required to ensure that sufficient new infrastructure is brought forward in a timely manner to support the significant level of residential development planned for.

## 17.6 Community cohesion

- 17.6.1 Issues relate to promoting a sense of community involvement and belonging, including by supporting relationships between people from different backgrounds and community groups.
- 17.6.2 Tottenham is one of the most ethnically diverse areas in the country. Over three quarters (78.9%) of the population have non White British ethnic group, compared to 55.1% for London. There are some 200 different languages spoken in Tottenham. The Haringey ‘Sustainable Community Strategy 2007-2016’ sets out an ambition to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.
- 17.6.3 The AAP aims to deliver a minimum of 10,000 homes over the period to 2026. It seeks to create mixed and balanced communities and to deliver affordable housing and better social infrastructure including new public spaces, thereby having a positive effect on community cohesion.

17.6.4 The level of regeneration proposed, supported by the **overarching regeneration and housing policies** amongst others, should help to make the area a more attractive place to live with more stable and connected communities and better access to high quality public spaces, thus contributing further to community cohesion. However, this level of growth and change may bring some disruption to existing communities, for example where re-housing is needed to allow for refurbishment or re-provision, or where private housing rents become an issue for some residents. Such disruption will need to be managed sensitively to ensure that existing social capital is not undermined.

17.6.5 **In conclusion**, the plan is likely to result in **significant positive effects** on the community cohesion baseline, assuming that the housing policy in particular is successful at creating more mixed and balanced communities.

17.6.6 As noted above the level of regeneration being planned for in Tottenham could bring disruption to existing communities while the area undergoes transformation. This will need to be managed sensitively to ensure that existing social capital is not undermined. The AAP could consider making reference to such issues.

## 17.7 Accessibility

17.7.1 There is a need to improve access to essential services and amenities for all groups, including cultural, health, leisure and banking facilities. Access to GPs is particularly poor in the area and the level of planned growth in Tottenham means a need for development of more health infrastructure.

17.7.2 The Tottenham Hale District Centre **overarching policy** should improve accessibility for people living in this area to a range of services and amenities. The Green Link policy should also improve accessibility for those living near it.

17.7.3 With regard to **neighbourhood areas**, the development of a new district centre in Tottenham Hale providing a range of local facilities (e.g. a large GP clinic and a new school) should significantly improve access to essential services and amenities for people living in this part of Tottenham. All of the neighbourhood area sections include references to improving accessibility. For example the North Tottenham section refers to the creation of a new access bridge to the Lee Valley Park and improved east-west connections; and the Tottenham Hale section refers to creating a new Green Link to the Lee Valley Park.

17.7.4 **In conclusion**, the plan is likely to result in **significant positive effects** on the accessibility baseline due to significant coverage of accessibility, particularly in the neighbourhood area sections. The level of regeneration proposed, including the new district centre at Tottenham Hale, provide big opportunities that must be capitalised upon.

17.7.5 It is vital that social infrastructure keeps pace with housing and population growth in the biggest growth areas, Tottenham Hale and Northumberland Park. However, other parts of Tottenham where less growth is planned should not be neglected; here too there are needs for improving accessibility for the existing population.

17.7.6 The plan's effect on accessibility could be strengthened by requiring, where practicable, that local facilities are clustered together so that the services required by the community - including health infrastructure, education provision, libraries and community spaces - are provided within accessible locations. In this manner different facilities can complement each other, integrate with the function of each neighbourhood area and utilise the space required for this provision efficiently.

## 17.8 Economic growth

17.8.1 Issues relate to securing sustainable economic growth and business development, through increasing and diversifying employment opportunities, meeting the needs of different sectors of the economy and facilitating new land and business development.

- 17.8.2 When it is compared with the rest of London, Haringey has levels of economic growth that are below the average, a higher rate of unemployment and lower gross weekly pay per capita. However it also has the highest start-up of new businesses in London; the economy is dominated by small businesses - 90% of businesses employ 10 or less people.
- 17.8.3 Evidence suggests that employment growth within Tottenham will come primarily from small and medium sized B1 businesses, the creative sector, and retail and leisure opportunities unlocked by the area's regeneration plans.
- 17.8.4 While many of the **overarching policies** relate to the broader regeneration of Tottenham, the policy that most explicitly contributes to economic growth is the regeneration policy, which requires development proposals to contribute to a diverse and sustainable economy.
- 17.8.5 As all of the **neighbourhood area** sections seek to coordinate and facilitate development and provide clarity to developers it is considered that all of these sections contribute to supporting economic growth in the area. Significant flexibility is provided to enable developers to create viable, successful schemes.
- 17.8.6 **In conclusion**, the plan is likely to result in **significant positive effects** on economic growth due to the large scale residential-led regeneration proposed in the AAP area by this plan. While there is some risk that there could be a loss of employment floorspace to mixed use development, this is set to be mitigated by the DM Policies DPD (DM 48) which makes clear that any mixed use development of employment locations should result in no net loss of employment floorspace.

## 17.9 Skills and training

- 17.9.1 Issues relate to developing the skills and training (included related facilities) needed to reduce unemployment and establish and maintain a healthy labour pool.
- 17.9.2 More Haringey employment than the London norm is with small firms often in the form of local retailers; this limits opportunities for employee training and progression within local firms.
- 17.9.3 Evidence from providers active in the area suggest ongoing pressing demand for training in ESOL, literacy, numeracy and ICT, and flows of people into employment once these skills barriers are addressed.
- 17.9.4 Part of the **spatial vision** for Haringey is that "new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough". There is a strategic objective in the AAP to provide "world class training and education" but there are no explicit references to skills and training in the **overarching AAP policies**. It should be noted that these issues are picked up in the DM Policies DPD, for example it includes DM57 that seeks planning contributions to facilitate opportunities for local training, including apprenticeships.
- 17.9.5 There are no explicit references to skills and training in the **neighbourhood area** sections although three of the four areas identify sites for schools and there may be potential to use these for skills training for the wider community outside of core school hours.
- 17.9.6 **In conclusion**, the plan is likely to result indirectly in positive effects on skills and training through facilitating more new development in the area that will be required (through policy DM57 of the Development Management Policies) to make financial contributions to, amongst other things, fund local training. The significant amount of construction work will also create opportunities for on site training and apprenticeships. These effects are not considered to be significant.
- 17.9.7 The positive effects could be enhanced by setting out more specific requirements for the development of relevant training facilities, for example as part of the site allocations.



## 17.10 Economic inclusion

- 17.10.1 There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses.
- 17.10.2 Tottenham has some of the highest levels of unemployment in London and England, particularly amongst young people. The London Plan highlights the 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
- 17.10.3 There are no explicit references to economic inclusion in the **overarching policies** but accessibility to jobs in and around Tottenham Hale should be supported by the designation of a new district centre and the large scale regeneration and access improvements proposed. It is noted that this matter is covered in the adopted Strategic Policies and emerging Development Management Policies DPD.
- 17.10.4 Physical accessibility to jobs will be improved as part of the wide ranging plans for regeneration of the **neighbourhood areas**. There are no explicit references to economic inclusion.
- 17.10.5 **In conclusion**, the plan is likely to result in positive effects on economic inclusion, however the scale and significance of these effects is uncertain at this stage. This is because large scale residential-led regeneration of the area may lead to the loss or displacement of some local businesses (either directly or indirectly as a result of increasing rents), meaning accessibility to some types of existing jobs (e.g. lower skilled jobs) could be reduced.

## 17.11 Town centres

- 17.11.1 Issues relate to enhancing the environmental quality of town centres (including quality of buildings and public realm), ensuring they are easily accessible and meet local needs and promoting them.
- 17.11.2 Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The scale of the High Road has to a large part been an obstacle to creating a cohesive and distinctive High Street experience. The economic down turn has stunted the ability of many of these centres to fulfil their function effectively. However Tottenham Hale was the best performing of Haringey's centres with no vacant town centre floor space
- 17.11.3 The Tottenham Hale District Centre **overarching policy** supports regeneration of Tottenham Hale and the creation of a new district centre here. Development requirements cover an improved public realm and the creation of attractive, functional public spaces.
- 17.11.4 Many of the **neighbourhood area sections** touch on town centre uses (e.g. improvements at Bruce Grove) but the Tottenham Hale section is most significant as it highlights the intent to create a new district centre on two specific sites. Along new streets a range of retail, leisure or community facilities in small scale units at ground floor level will be sought.

17.11.5 **In conclusion**, the plan is likely to result in **significant positive effects** on the town centres baseline (though this is to some extent dependent on wider factors such as the national economic outlook and challenges to the high street from new developments such as internet shopping). In particular, the intent to create a new district centre at Tottenham Hale will ensure that the needs of existing and new residents in this area can be better met; the proposed expansions and improvements to other centres are also important. Research has indicated that the expansion of Tottenham Hale into a District Centre (including the related intensification of retailers and services) would not detrimentally impact on the existing district centres of Seven Sisters and Bruce Grove. This is an important issue and the impacts of the developing centre on other centres should be closely monitored; the aim should be the development of complementary centres, taking into account nearby centres beyond Haringey such as the proposed new Meridian Water development in Enfield.

## 17.12 Biodiversity

17.12.1 There is a need to protect and enhance priority species and habitats, improve ecological connectivity and enhance access.

17.12.2 The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem. This area is home to European designated sites and is a Site of Special Scientific Interest. The River Lee Navigation and Pyre's Brook waterways also offer a habitat for wildlife. There are no designated Sites of Importance for Nature Conservation in Tottenham and much of the area generally lacks access to the natural environment.

17.12.3 Objective 8 of the AAP includes an aim to create an interconnected Green Grid. None of the **overarching policies** refer to biodiversity explicitly although this topic is covered in the adopted Strategic Policies and emerging DM Policies DPD.

17.12.4 The Tottenham Hale District Centre policy requires the provision of green space and trees which could contribute to biodiversity; and the creation of a new green open space in Bruce Grove.

17.12.5 The Green Link policy seeks to support the creation of a new axial green link between Tottenham High Road and Lee Valley Park. This Green Link will include high quality landscaping and is envisaged as a bold green infrastructure investment; thus it is assumed this could create some biodiversity value.

17.12.6 It will be important to ensure that the pressure to meet housing delivery targets and deliver more employment floorspace is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around increasing provision of, and quality of, small parks and amenity green spaces and securing new open space as part of new development in the Tottenham Area of Change.

17.12.7 With regard to **neighbourhood areas**, the Tottenham Hale section proposes creating an improved pedestrian and cycle link to the Lee Valley Park and refers to development of the Green Link (see above). This section also includes a riverside site where development is required to ecological interests. The North Tottenham section include requirements for new and enhanced public spaces including a large new community park; the latter could potentially create significant new biodiversity value if designed and managed for this objective.

17.12.8 The Seven Sisters section includes one site where planning contributions will be sought to improve the quality and utility of the green spaces near to the site (the text also reaffirms the need to preserve and enhance the SINC and green corridor) and one site where a Green Link route should be facilitated.

- 17.12.9 **In conclusion**, the impact of the plan on biodiversity is unclear at this stage. Potential positive effects include the creation of a 'green link' to the Lee Valley Park and development and enhancement of some pocket parks. However the design of the former (and thus its value for biodiversity) is not clear at this stage and the delivery of more green space does not appear to form a prominent part of policies or many site allocations at this stage.
- 17.12.10 An expanding population and new development is likely to be place increasing pressure on existing green spaces and biodiversity. Increased use of the Lee Valley Park as a result of improved access could have negative impacts for the biodiversity there if use cannot be properly managed.
- 17.12.11 The plan could be strengthened by including a more robust approach to securing the provision of green space, trees and vegetation as part of new development.

### 17.13 Townscape and cultural Heritage

- 17.13.1 Key issues relate to preserving or where possible enhancing buildings and areas of architectural and historic interest.
- 17.13.2 Tottenham has nine Conservation Areas and includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas. The North Tottenham Conservation Area is identified on English Heritage's Heritage at Risk Register as a conservation area at risk.
- 17.13.3 There are no explicit references to townscape/cultural heritage in the **overarching policies**, though this issue is addressed in the Development Management Policies. The council could consider highlighting the specific opportunities for heritage led regeneration as part of the overarching regeneration policy, building on the high level heritage regeneration policy proposed in the DM Policies (DM13).
- 17.13.4 The **neighbourhood area section** makes limited references to issues of townscape and cultural heritage. Examples include reference in the Seven Sisters and Tottenham Green section to a need for targeted building and shop front/signage improvements consistent with the enhancement of the character, heritage and townscape attributes of the area; and reference in the Bruce Grove section to seeking limited growth consistent with the existing scale and character of the Conservation Area and town centre.
- 17.13.5 **In conclusion**, the impact of the plan on townscape and cultural heritage is likely to be small relative to the 'no plan' baseline given the limited coverage of these issues in the AAP. Strategic policies in the DM Policies DPD (e.g. DM12) seek to protect and enhance townscape and heritage assets.
- 17.13.6 The council could consider highlighting the opportunities for heritage led regeneration as part of the overarching regeneration policy, as well as providing more detail in the neighbourhood area requirements about how development schemes should enhance local heritage assets and their settings.
- 17.13.7 The scale of regeneration proposed will need to be carefully managed to ensure that existing assets and conservation areas treated sensitively in all proposals.

### 17.14 Open space

- 17.14.1 There is a need to deliver a network of high quality, accessible open spaces across Tottenham. Tottenham has a severe problem with a lack of accessibility to the wider natural environment. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem.

- 17.14.2 Objective 8 of the AAP includes an aim to create an interconnected Green Grid. There is limited reference to open space in the **overarching policies** although the Tottenham Hale District Centre policy requires provision of green space and trees; and the creation of a new green open space in Bruce Grove.
- 17.14.3 The Green Link policy seeks to support the creation of a new axial green link between Tottenham High Road and Lee Valley Park. This Green Link will include high quality landscaping and is envisaged as a bold green infrastructure investment; however the extent to which this will provide open space as opposed to a transit route is unclear.
- 17.14.4 With regard to **neighbourhood areas**, the Tottenham Hale section proposes creating an improved pedestrian and cycle link to the Lee Valley Park and refers to development of the Green Link (see above). The North Tottenham section includes requirements for new and enhanced public spaces including a large new community park. The Seven Sisters section includes one site where planning contributions will be sought to improve the quality and utility of the green spaces near to the site and one site where a Green Link route should be facilitated.
- 17.14.5 **In conclusion**, the impact of the plan on open space is unclear at this stage. Potential positive effects include the creation of a 'green link' to the Lee Valley Park and the development of more pocket parks. However the design of the former is not clear at this stage (e.g. is it purely a transit route or also an open space?) and the delivery of more open space does not appear to form a prominent part of policies or many site allocations at this stage. Moreover, an expanding population and new development is likely to be place increasing pressure on existing green spaces.
- 17.14.6 It will be important to ensure that the pressure to meet housing delivery targets and deliver more employment floorspace is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around increasing provision of, and quality of, small parks and amenity green spaces and securing new open space as part of new development in the North Tottenham Area of Change. Robust implementation of the proposed open space policy in the DM Policies DPD (DM26) should help to mitigate this risk. However, the plan could be strengthened by having a more robust approach to securing new open spaces as part of new development.

## 17.15 Water resources

- 17.15.1 Issues relate to preserving water quality (ground and surface) and quantity and ensuring the type and capacity of infrastructure is known for future development.
- 17.15.2 The modification of rivers in the area including in-stream structures and culverts has led to loss of habitat diversity. Upstream of its upper confluence with Pymmes Brook the River 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).
- 17.15.3 There are no explicit references to water resources in the **overarching policies** but is clear that the substantial growth in population and business planned for in Tottenham will place greater demands on water supply and waste water infrastructure.
- 17.15.4 With regard to **neighbourhood areas**, development of the Green Link will greatly improve access from Tottenham Hale to the open spaces and waterways of the Lee Valley Park. The Hale Wharf site, which provides access to the waterways, will be an important site. The need to ensure that development close to waterways helps to protect and where possible enhance water quality (e.g. through provision of sustainable drainage measures that cleanse water runoff) would be a useful addition. Opportunities to deculvert and improve the ecological value of waterways should also be taken.

- 17.15.5 One site allocation in the Seven Sisters section refers to the need to consult Thames Water *“with regards the capacity of existing drains to move waste water from the site. 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.”*
- 17.15.6 **In conclusion**, the plan is likely to result in increased consumption of water resources (relative to the existing situation) due to increases in water demand and potentially also increased risks to ground and surface water quality from development. However the effect relative to the baseline of ‘no plan’ is likely to be insignificant as both would involve high levels of growth in the area (this being driven by London Plan targets).
- 17.15.7 The plan could be strengthened by requiring that development close to waterways helps to protect and where possible enhance water quality (e.g. through requiring provision of sustainable drainage measures that cleanse water runoff, building on the proposed Sustainable Drainage Systems policy in the Development Management Policies); and where practicable deculverts and improves the ecological value of waterways. The plan, or the DM Policies DPD, could also establish water efficiency targets for new development (taking into account the Housing Standards Review) to reduce consumption per capita.
- 17.16 Soil and land quality**
- 17.16.1 Issues relate to encouraging the effective use of land through the development of brownfield land (including where necessary the remediation of contamination).
- 17.16.2 The majority of development proposed in Tottenham is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Tottenham which may need to be remediated before development.
- 17.16.3 There are no explicit references to these issues in the **overarching policies**, but it is clear that the majority of development proposed in Tottenham is on brownfield land. The need to address risks from land contamination as part of development is highlighted in the DM Policies DPD (DM34).
- 17.16.4 A number of site allocations in different **neighbourhood areas** highlight the need for studies to be undertaken to understand what potential contamination there is on this site prior to any development taking place.
- 17.16.5 **In conclusion**, the plan is likely to result in positive effects on the land baseline in terms of encouraging the effective use of land through the development and remediation (where required) of brownfield land (assuming development is designed appropriately and is targeted at meeting local needs and is therefore effective). However the effect is not considered significant as the plan contains few strong provisions.
- 17.16.6 Where a brownfield site has been undisturbed for a significant time period the plan could require the need for an ecological survey to ascertain the biodiversity value of the land.
- 17.17 Flood Risk and climate change**
- 17.17.1 There is a need to reduce and manage flood risk from all sources, including through the use of sustainable drainage measures.
- 17.17.2 The main source of flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. Tottenham Hale has more than 50% of the ward lying within Flood Zone 2.
- 17.17.3 There are no explicit references to flood risk issues in the **overarching policies** but this is understandable given that Policies DM35 and DM36 of the Development Management Policies sets out key principles and clear requirements in relation to this issue.

- 17.17.4 In the **neighbourhood areas** section some site allocations highlight the need to consider flood risk (e.g. sites SS2 and NT2 are in Critical Drainage Areas and site TH1 is in flood zone 2) and, where relevant, to submit a Flood Risk Assessment.
- 17.17.5 **In conclusion**, the plan is likely to have negative effects on flood risk without appropriate mitigation. This is because high levels of development are proposed for Tottenham Hale, much of which is in flood zone 2. Consequently new development in the area could exacerbate flood risk (to occupiers and/or to other buildings) by being in the flood zone as well as by increasing the risk of surface water and sewer flooding (by reducing the permeability of the ground and adding to the pressure on the combined sewers during heavy rainfall events). Also some other development sites are in critical drainage areas for surface water flooding.
- 17.17.6 Mitigation of these potential negative effects should be provided by policies in the DM Policies DPD (e.g. DM35 and DM36).

### 17.18 Air quality

- 17.18.1 There is a need to improve local air quality, including through measures to reduce car use such as encouraging businesses to produce green travel plans. The area 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.
- 17.18.2 There are no explicit references to these issues in the **overarching policies**. Given that poor air quality is primarily linked to traffic congestion the council should consider highlighting the need to facilitate public transport accessibility and encourage walking and cycling as part of the regeneration policy.
- 17.18.3 Multiple site allocations in the **neighbourhood areas** (e.g. Seven Sisters sites SS1-SS7) refer to the need to improve local air quality on site.
- 17.18.4 **In conclusion**, the impact of the plan on air quality is likely to be limited as there are few requirements relating to this issue in the AAP. Improvements in public transport accessibility as part of wider regeneration could reduce traffic-related transport emissions per capita (albeit net emissions may increase over the plan period as these gains are offset as the new development planned for in the area brings a growing population all of whom will presumably need to travel).
- 17.18.5 The council should consider highlighting the need to facilitate public transport accessibility and encourage walking and cycling as part of the regeneration policy. Other measures such as provision of street trees and electric car charging points could also be encouraged to further improve air quality. This would usefully extend the broad policy references to air quality management included in the DM Policies DPD.

### 17.19 Noise

- 17.19.1 There is a need to minimise the impact of the ambient noise environment on quality of life. However, there is no suitable baseline data available for this issue.
- 17.19.2 There are no explicit references to noise issues in the **overarching policies**. However the shift from B2/B8 to B1 on some employment land sites as part of planned regeneration could reduce noise emissions and thus have benefits for any nearby housing.
- 17.19.3 Multiple site allocations in the **neighbourhood areas** (e.g. Seven Sisters sites SS1-SS7) refer to the need to reduce noise pollution on site.
- 17.19.4 **In conclusion**, the impact of the plan on noise relative to the baseline of 'no plan' is considered to be intangible given the limited coverage of this issue in the AAP.

## 17.20 Energy and carbon

- 17.20.1 There is a need to minimise energy use and increase energy efficiency and use of renewable energy. There are considerable opportunities, given that Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in Tottenham Hale and other areas.
- 17.20.2 The AAP objectives include an emphasis on delivering energy efficient homes. The **vision section** also refers to the aspiration for a decentralised energy network. The regeneration policy highlights the need to reduce carbon emissions and adapt to climate change.
- 17.20.3 With regard to **neighbourhood areas**, the Tottenham Hale policy states that sites within Tottenham Hale should facilitate connection to the decentralised energy network or provide part of the site as easement for the network.
- 17.20.4 Multiple site allocations are identified as being in an area with potential for being part of a decentralised energy network. For each site the AAP states that the role they play in the network could include providing an energy centre, being a customer or providing an easement for the network.
- 17.20.5 **In conclusion**, the impact of the plan on energy and carbon emissions relative to a baseline of 'no plan' is likely to be positive. This is because the development of a decentralised energy network, potentially connecting to the network under development in neighbouring Enfield, would provide a low carbon source of heat for new and existing buildings, helping to reduce carbon emissions per capita. However the effect is not considered to be significant as policy DM30 of the Development Management Policies is viewed as the key driver of decentralised energy development.
- 17.20.6 The support that the AAP provides to development of decentralised energy could be strengthened by developing an area specific policy on decentralised energy that clearly allocates sites for energy centres and identifies network routes.
- 17.20.7 Wider factors will have a bearing on the actual change in net emissions, such as tightening of the energy efficiency standards for new buildings (in the Building Regulations), changes to the power generation fuel mix at a national level, changes in transport technology (e.g. increased uptake of electric vehicles) and changes in the efficiency of household appliances. The large increase in population may result in a net increase in emissions relative to the existing situation despite efficiency improvements.

## 17.21 Waste management

- 17.21.1 There is a need to reduce consumption of raw materials and increase re-use and recycling rates and use of sustainable materials.
- 17.21.2 Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and 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.
- 17.21.3 There are no explicit references to these issues in the **overarching policies**. This issue appears to have been left to the Strategic Policies (SP6), DM Policies DPD (DM10 and DM11) and the forthcoming North London Waste Plan.
- 17.21.4 With regard to **neighbourhood areas**, site allocation NT2 refers to an existing waste management facility and the need to provide an additional compensatory site if this were developed for a non-waste use.

- 17.21.5 **In conclusion**, the AAP is unlikely to have a significant effect in terms of waste management, and it is noted that the Strategic Policies (SP6) and DM Policies DPD (DM10 and DM11) includes policies on waste management and new waste facilities.
- 17.22 Sustainable transport**
- 17.22.1 Issues relate to improving walking and cycling routes, promoting the use of public transport and reducing the use of private cars.
- 17.22.2 Tottenham has some of north London’s best transport links with the Victoria line and rail services to Stratford, the City, Stansted Airport and Cambridge. Further investment in transport connectivity through Crossrail 2 (to be confirmed) and a major redevelopment of Tottenham Hale Tube, rail and bus station will further enhance this. Currently cycling only forms 2% of all journeys, more and better infrastructure is needed.
- 17.22.3 Significant public transport investment is happening or planned across Tottenham and the DM Policies DPD contains important strategic policies that will apply to Tottenham. Within the AAP the **overarching policies** do not focus on transport issues, however the Green Link policy provides for a new east-west walking and cycling route between Tottenham High Road and Lee Valley Park.
- 17.22.4 The site allocations for the **neighbourhood areas** highlight sustainable transport issues including requirements for improved railway stations (e.g. Northumberland Park, Bruce Grove), new and improved bus services and better pedestrian and cycle friendly routes (e.g. the proposed Green Link to Lee Valley Park). Some site allocations also refer to the need to minimise parking provision due to excellent local public transport connections.
- 17.22.5 **In conclusion**, the plan is likely to result in positive effects on the sustainable transport baseline through the detailed requirements in the neighbourhood areas.
- 17.22.6 Given the low level of cycling the AAP could be strengthened by providing more detail on the proposed cycle network in the AAP area to ensure that a strategic approach is taken. It will be important to coordinate development with cross-borough sustainable transport projects such as the proposed Cycling Superhighway 1 running from Tottenham into the City of London.
- 17.22.7 Further options that could be considered include introducing ‘car free’ requirements (with the exception of disabled parking) for residential developments in highly accessible locations and/or requirements developments to support car clubs. This would build on *encouragement* for contributions to car club schemes or the provision of car club bays; and *support* for development with no on-site parking (under certain conditions) in the DM Policies DPD (DM43).



**17.23 Overall conclusions and recommendations**

- 17.23.1 The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with 'significant' positive effects identified as likely in terms of: health, housing, community cohesion, accessibility, town centres and economic growth. Though not judged to be significant at this stage, there are also potential positive effects identified in terms of: crime, education, skills and training, economic inclusion, soil and land quality and energy and carbon emissions.
- 17.23.2 A potential negative effect (relative to the baseline of 'no plan') is identified on flood risk, though the significance of the effect is uncertain. Flood risk policy in the DM Policies DPD should mitigate this effect to a large extent.
- 17.23.3 It is also important to point out that, whilst positive effects are generally predicted in terms of socio-economic issues/objectives, some risks are also highlighted. Specifically, there is a risk that development consistent with the proposed plan policies could lead to some disruption to existing communities. There is also a risk that some existing business sectors could be impacted by the policy focus on employment site renewal.
- 17.23.4 Effects on biodiversity and open space were identified as unclear at this stage based on the evidence available. While the creation of a new Green Link to the Lee Valley Park could contribute to both objectives, the design of this green infrastructure intervention is not yet agreed and the delivery of more green space does not appear to form a prominent part of policies or many site allocations at this stage (although it is recognised that there are relevant policies in the emerging DM Policies DPD).
- 17.23.5 The appraisal highlights a number of instances where policy wording in the plan could be reworded or elaborated on in order to strengthen the positive effects of the plan (e.g. crime, housing, accessibility, biodiversity, open space, townscape/heritage, water resources, air quality, energy and carbon, sustainable transport).

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

## 18 INTRODUCTION (TO PART 4)

The report must include...

- Measures envisaged concerning monitoring.

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

## 19 PLAN FINALISATION

### Publication

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

19.1.2 **The SA Report** (as opposed to an *Interim* SA Report) will be published alongside the Proposed Submission Plan. It will provide all of the information required by the Regulations. Table 19.1 compares the information that will be presented within the SA Report to that which is presented in this Interim SA Report.

Table 19.1: Information contained within this Interim SA Report and the forthcoming SA Report

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

### Submission / adoption

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

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

## APPENDIX I – SPATIAL STRATEGY

### Introduction

Part 2 (above) presents summary appraisal findings in relation to the following spatial strategy alternatives:

- Option 1** – Spatial strategy as stated in the AAP, with growth focused mostly in Tottenham Hale, Northumberland Park and High Road West
- Option 2** – Allocate more growth to the northern edge of Tottenham (north of Northumberland Park), capitalising on synergies with the Enfield's transformative Central Leaside/Meridian Water mixed use development immediately adjacent to Haringey's northern border, and less to the above three areas.

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

### Methodology

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

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

Effects are predicted taking into account the criteria presented within Regulations.<sup>16</sup> 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 AAP).

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.

<sup>16</sup> Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

## Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Northumberland Park and Tottenham Hale are considered as particularly vulnerable for crime. As both options involved significant regeneration of Northumberland Park and Tottenham Hale (including jobs growth) both are considered likely to have positive effects on crime. However, the effect on crime of these options is uncertain and is not considered likely to be significant given the limited extent to which the planning system can influence levels of crime and anti-social behaviour. It is not possible to distinguish between the effect of each option on crime; therefore both have been rated as 2.	1	1
Education	Educational attainment in Tottenham is improving but it remains below London levels. In 2013, 69% of the pupils who live and study in the area achieved level 4+ at Key Stage 2, compared to 79% in London. In 2013, 57% of pupils achieved 5 or more A*- C at GCSE level, compared to 64.5% in London. This reduces to 50% in Seven Sisters. The AAP highlights Tottenham Green/ Seven Sisters as having an important education function. The two spatial strategy options do not focus on development in this area and it is not considered that they would have a marked differential impact on this objective (although it is noted that the proposals for Meridian Water just across the northern borough boundary in Enfield include at least two primary schools, one secondary school and two early years facilities, relevant to option 2). However as part of wider regeneration there will be scope to significantly enhance and improve education provision in the area, hence both options are rated as 2 and as having significant positive impacts.	1	1
Health	Improving health and addressing health inequalities requires a targeted approach to addressing the wider determinants of health (e.g. access to green space and healthy food, air quality, housing, employment) as well as improved access to health services. As part of wider regeneration efforts there will be scope to significantly improve health service provision (e.g. access to GPs) as well as to better address the wider determinants of health such as access to green space. Indeed, both options are located relatively close to the Lee Valley Park and could have significant positive impacts on health by creating much better access to this resource. It is not considered that the two spatial strategy options would have a marked differential impact on this objective; therefore both options are rated equally and as having significant positive impacts.	1	1
Housing	Both options involve the development of large amounts of new housing which would provide greater choice, quality and diversity of housing across tenures, including more affordable housing, to meet local housing needs. Therefore both options are considered to have significant positive effects on this objective.	1	1
Community Cohesion	The Tottenham riots of 2011 highlight the need for greater community cohesion in this area in particular. Both options would involve large scale regeneration of Tottenham with the potential to significantly improve community cohesion, for example by creating integrated, mixed-tenure developments; enhancing existing town centres and improving open space provision and access. However the effect is uncertain as development consistent with the plan policies could bring some disruption to existing social networks, for example as a result of re-housing to allow refurbishment and re-provision. It was judged that the alternative options would have little differential impact on community cohesion.	1	1

Topic	Discussion	Opt 1	Opt 2
Accessibility	Access to cultural and leisure facilities and to essential services (banking, health, education) varies between neighbourhoods. As part of wider regeneration efforts there will be scope to significantly improve such access. It is not considered that the two spatial strategy options would have a marked differential impact on this objective; therefore both options are rated equally and as having significant positive impacts.	1	1
Economic Growth	High and increasing unemployment is perhaps the greatest challenge facing the borough; Tottenham has some of the highest levels of unemployment in London and the UK. A tenth of all Job Seekers Allowance claimants in Haringey (10,500) live in the Northumberland Park Ward, which has the highest number of out of work benefits claimants in London. While both options should generate more new employment opportunities in Tottenham (relative to the baseline 'no plan' scenario), there will also be some losses and/or disruption to existing businesses. Option 2 would likely entail re-designating the Strategic Industrial Land which sits adjacent to the boundary with Enfield (e.g. Brantwood estate); this would have a significant adverse effect on job creation, the local economic base and ultimately the job numbers target attributed to Haringey. Option 1 is therefore the preferred option here.	★1	2
Skills and Training	Access to training facilities should be enhanced as part of wider regeneration efforts. It may be possible to secure skills and training benefits for local people through the construction process. It is not considered that the two spatial strategy options would have a marked differential impact on this objective; therefore both options are rated equally. The significance of the potential impact relative to the baseline 'no plan' scenario is unclear, especially given the scale of the challenge and the limited ability of planning alone to influence this objective.	1	1
Economic Inclusion	Physical accessibility to jobs should be enhanced as part of the large scale of regeneration in Tottenham anticipated under both options, including new employment opportunities and improved transport links. However option 2 would likely entail re-designating the Strategic Industrial Land which sits adjacent to the boundary with Enfield (e.g. Brantwood estate); this would have an adverse effect on the local economic base and thus on physical accessibility to jobs in this part of Tottenham. Option 1 is therefore the preferred option here.	★1	2
Town Centres	Both options would support the improvement of the viability and vibrancy of Tottenham's town centres. The creation of the new district centre at Tottenham Hale (a key part of both options) to support large scale residential-led regeneration in the area (which both options include) is considered to have a significant positive effect on this objective due to the opportunity the development of a new town centre in this location creates.	1	1
Biodiversity	The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem. There are no designated Sites of Importance for Nature Conservation in Tottenham and much of the area generally lacks access to the natural environment. Both spatial strategy options present opportunities to improve access to biodiversity, particularly by improving east-west links through to the Lee Valley Park from Tottenham Hale and Northumberland Park. However increased use of the Lee Valley Park as a result of improved access could have potential negative impacts for the biodiversity there if use cannot be properly managed, therefore the overall impact is uncertain. The overall impact of both options on biodiversity will also be influenced by	1?	1?

Topic	Discussion	Opt 1	Opt 2
	the expanding population and new development is likely to be place increasing pressure on biodiversity; however it must be born in mind that the baseline 'no plan' option would also be likely to involve high levels of growth in the area given the need to meet the housing target for Haringey in the Further Alterations to the London Plan.		
Townscape and Cultural Heritage	Tottenham has nine Conservation Areas and includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas. It is not considered that the two spatial strategy options would have a marked differential impact on this objective; therefore both options are rated equally. The significance of the potential impacts of both options on this objective are unclear – while they could provide opportunities to preserve and enhance heritage assets and their settings, the scale of regeneration proposed in Tottenham will need to be carefully managed to ensure that existing assets and conservation areas are treated sensitively.	1?	1?
Open Space	Tottenham has a severe problem with a lack of accessibility to the wider natural environment. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem. Both spatial strategy options present opportunities to improve access to open space, particularly by improving east-west links through to the Lee Valley Park from Tottenham Hale and Northumberland Park. Conversely, an expanding local population and high levels of new development are likely to be place increasing pressure on existing open spaces with potentially negative impacts on their quality and provision. The baseline 'no plan' option would also be likely to involve high levels of growth in the area given the need to meet the housing target for Haringey in the Further Alterations to the London Plan; however it is assumed the levels of growth would not be as high as that targeted growth of Tottenham proposed in these options.	1?	1?
Water Resources	Both options are likely to result in negative effects on water resources as the significant levels of growth proposed will result in increased water demand and potentially also increased risks to ground and surface water quality from development. The baseline 'no plan' option would also be likely to involve high levels of growth in the area given the need to meet the housing target for Haringey in the Further Alterations to the London Plan; however it is assumed the levels of growth would not be as high as that targeted growth of Tottenham proposed in these options. The significance of these negative effects is uncertain at this time and will depend on what mitigation measures are implemented.	1?	1?
Soil and Land Quality	The majority of development proposed in Tottenham is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Tottenham which may need to be remediated before development. Both spatial strategy options are considered likely to result in significant positive effects on the land baseline in terms of encouraging the effective use of land in Tottenham through the development of brownfield land. It is not considered that the two spatial strategy options would have a marked differential impact on this objective; therefore both options are rated equally.	1	1
Flood Risk and Climate Change	The main source of flood risk within the borough is the River Lee; there is also some risk from surface water and groundwater flooding. Tottenham Hale has more than 50% of the ward lying within Flood Zone 2. Much of the area to the north and east of Northumberland Park along the boundary with	1?	1?

Topic	Discussion	Opt 1	Opt 2
	<p>Enfield also lies within Flood Zone 2. It is therefore considered that the two spatial strategy options perform similarly with respect to this objective and that, without effective mitigation, both options will have negative effects on flood risk by allocating significant development to flood zone 2. The significance of these effects is unclear as it will depend on the mitigation measures implemented (e.g. the DM Policies DPD includes proposed policies on flood risk management and sustainable drainage systems).</p>		
Air Quality	<p>The area suffers poor air quality, primarily because of traffic congestion. Improving air quality is a challenge, particularly along major roads which provide a significant proportion of PM10 concentrations in Haringey. It was judged that the alternative options would have little differential impact on air quality therefore both are rated equally. The overall effects of both options are unclear as regeneration could help to reduce traffic-related transport emissions per capita in the area; however these benefits may be offset as the high levels of new development planned for the area brings a growing population (all of whom will presumably need to travel) and as new jobs attract additional workers/commuters.</p>	1?	1?
Noise	<p>It was judged that the alternative options would have little differential impact on this objective, therefore both are rated equally. The overall effects of both options are unclear. Shifts in employment uses could reduce the amount of noise generated on some employment sites. On the other hand the significant new development planned for the area will generate significant noise impacts during the construction phase (both on construction sites and from related truck movements) and potentially also afterwards due to the higher density of occupiers and associated impacts on ambient noise levels.</p>	1?	1?
Energy and Carbon	<p>Haringey is planning to develop decentralised energy networks to supply energy efficiently to buildings in Tottenham Hale and Northumberland Park, the latter connecting to an energy centre in the new Meridian Water development in Enfield (decentralised energy 'connection zones' are identified in the DM Policies DPD).</p> <p>As both options involve development in these areas it was considered that both would benefit equally from decentralised energy networks in terms of securing a low carbon source of heat for new and existing buildings and potentially helping to reduce carbon emissions per capita. However these savings may be cancelled out by the substantial increase in population and employment floorspace being planned for Tottenham, possibly resulting in a net increase in energy and carbon emissions over the plan period.</p> <p>Wider factors will also have a significant bearing on net emissions, such as tightening of the energy efficiency standards for new homes (in the Building Regulations), changes in transport technology and changes in the efficiency of household appliances, however these changes will apply relatively equally to both options and the baseline scenario.</p>	1?	1?
Waste Management	<p>Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and 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. It was judged that the alternative options would have little bearing on this topic. Strategic Policies and Development Management policies in waste and recycling will have a far greater effect.</p>	N/a	N/a



Topic	Discussion	Opt 1	Opt 2
Sustainable Transport	<p>Both spatial strategy options involve significant growth at Tottenham Hale. This will be centred on a redeveloped Tottenham Hale station (with better facilities for buses, cyclists and pedestrians) which already has excellent transport links via National Rail and London Underground services and may also serve Crossrail 2 in future. This should have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area.</p> <p>Growth at High Road West and Northumberland Park will be accompanied by access and interchange improvements to White Hart Lane and Northumberland Park stations respectively, supporting increased use of these rail links (and possibly also Crossrail 2 in future).</p> <p>The relocation of Angel station in Enfield southwards to provide a new station to serve the Meridian Water development may also offer an alternative option for developments located on the northern edge of Tottenham (option 2).</p> <p>The level of regeneration involved should also present important opportunities to improve cycling and walking routes.</p> <p>Overall it is anticipated that both spatial strategy options would have significant positive effects on sustainable transport. The alternative options would have little differential impact on this objective, therefore both are rated equally.</p>	1	1
<p><u>Summary</u></p> <p>The alternatives perform similarly in terms of a range of objectives, with equally significant positive impacts anticipated in terms of education, health, housing, community cohesion, accessibility, town centres, soil and land quality and sustainable transport. Option 1 was considered to perform best in terms of economic growth and economic inclusion. Option 2 would likely lead to a significant negative effect in this respect given the likelihood of this option necessitating re-designating Strategic Industrial Land (SIL).</p>			

## APPENDIX II – EMPLOYMENT SITES

### Introduction

Part 2 (above) presents summary appraisal findings in relation to the following alternatives for employment:

**Option 1** – Allow the introduction of non-employment uses (as part of mixed use schemes) in certain re-classified employment locations, to facilitate regeneration led mixed use development.

**Option 2** – No allowance for cross subsidy. Only allow employment uses on designated sites.<sup>17</sup>

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

### Methodology

See discussion in Appendix I.

### Appraisal findings

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

<sup>17</sup> N.B. These alternatives are also appraised within the DM Policies DPD Interim SA Report

Topic	Discussion	Opt 1	Opt 2
	Regeneration of employment areas could have negative impacts on existing businesses if increases in average rents or changes in floorspace provision force them to relocate. However this should be mitigated by the requirement in Policy DM 48 for a proportion of the provided employment floorspace to be affordable workspace in perpetuity.		
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site is likely to mean that the employment use is office based, leading to fewer problems around noise and disturbance.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a
<p><b>Summary</b></p> <p>Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.</p> <p>N.B. Appraisal findings here are the same as under the heading of 'Employment 2' within the DM Policies DPD Interim SA Report, i.e. it is not suggested that the Tottenham context has a bearing on the appraisal of alternatives in relation to cross-subsidy requirements when redeveloping existing employment sites.</p>			

## APPENDIX III – TOWN CENTRE HIERARCHY

### Introduction

Part 2 (above) presents summary appraisal findings in relation to the following alternatives for town centres:

**Option 1** - Retain / reinforce existing town centre hierarchy, along with designating a new district centre and (associated town centre management policies) at Tottenham Hale.

**Option 2** - Retain / reinforce existing town centre hierarchy.

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

### Methodology

See discussion in Appendix I.

### Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	No notable implications.	N/a	N/a
Community Cohesion	Retention and reinforcement of existing town centres would be expected to improve community cohesion, particularly with regard to cultural identity, belonging and well-being. At present, the Tottenham Hale area lacks cohesion and legibility. As such, Option 1 provides an opportunity to improve the physical condition of the area which in turn would be expected to have a positive effect on community cohesion.	★1	2
Accessibility	Option 1 provides the opportunity to redevelop the area around Tottenham Hale which could include improving access to the adjoining Lee Valley Regional Park, an important cultural and leisure facility in Tottenham.	★1	2
Economic Growth	The retention and reinforcement of existing town centres would encourage sustainable economic growth. Option 1, promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration in the area would be likely to have a <b>significant positive effect</b> on economic growth.	★1	2
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	Both options would support the improvement of the viability and vibrancy of the borough's town centres. The creation of the new district centre at Tottenham Hale, to support large scale residential-led regeneration in the area, is considered to be a <b>significant positive effect</b> due to the opportunity the development of a new town centre in this location creates.	★1	2
Biodiversity	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Townscape and Cultural Heritage	Both options would support the improvement in townscape terms of the borough's town centres. The area around Tottenham Hale is recognised as currently having low townscape value. Designation and redevelopment of this area as a new district centre is considered likely to have a <b>significant positive effect</b> due to the opportunity to substantially improve the quality of the area.	★ 1	2
Open Space	Option 1 provides the opportunity to redevelop the area around Tottenham Hale which could include improving access to the adjoining Lee Valley Regional Park.	★ 1	2
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough little or no risk (Zone 1). Development of the Tottenham Hale town centre will need to have regard to the flood risk but it is considered that this can be addressed through requirements for flood resilience and resistance measures.	2	★ 1
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	As described in Tottenham Hale Urban Centre Masterplan Supplementary Planning Document (2006) a new district centre at Tottenham Hale would be centred on a redeveloped Tottenham Hale station (National Rail and London Underground services). The upgrade also includes better facilities for buses, cyclists and pedestrians. Development of a new district centre is considered to be a <b>significant positive effect</b> in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area. This positive effect would be even greater if a station at Tottenham Hale is confirmed as part of the Crossrail 2 project.	★ 1	2
<p><u>Summary</u></p> <p>Option 1 is the preferred option. It would lead to a range of positive effects, including significant positive effects on: economic growth, town centres and townscape, including by promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration. Development of the district centre will also have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area.</p> <p>Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough at little or no risk (Zone 1). Development of the Tottenham Hale district centre will need to have regard to the flood risk, but it is considered that this can be addressed through establishing requirements for flood resilience and resistance measures.</p>			

## APPENDIX IV – BUILDING HEIGHTS

### Introduction

Part 2 (above) presents summary appraisal findings in relation to the following alternatives for building heights policy:

- Option 1** - Apply locally specific requirements for building heights, including high rise buildings, in specific locations in Tottenham; with the aim of ensuring that the height of new buildings respond and help to define the surrounding character, whilst optimising opportunities for intensification/regeneration.
- Option 2** - Apply borough-wide development management policies for tall buildings/character (e.g. policy DM5 of the Development Management Policies).

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

### Methodology

See discussion in Appendix I.

### Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	The development of tall buildings can contribute to housing delivery. Policy DM5 of the Development Management Policies sets out areas suitable for tall buildings and key design criteria. Within the context of this policy it is considered that option 1 and 2 would have little differential impact on overall housing delivery, therefore both options have been ranked equally.	1	1
Community Cohesion	No notable implications.	N/a	N/a
Accessibility	No notable implications.	N/a	N/a
Economic Growth	The development of tall buildings could create additional space for business development and new employment opportunities. However indiscriminate development of tall buildings could put pressure on infrastructure including transport infrastructure, potentially undermining growth prospects. On balance it is considered that there is insufficient evidence to judge the relative performance of Option 1 and 2 against this objective, therefore both options have been ranked equally.	1	1
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	The Tottenham Hale neighbourhood area, a proposed new district centre, includes a number of sites identified as suitable locations for tall buildings and establishes specific height and design requirements. In this regard, the greater level of site specific control/clarity for this town centre afforded by Option 1 will be positive in terms of enhancing the town centre.	★1	2

Topic	Discussion	Opt 1	Opt 2
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	Option 1 takes a location specific approach to building heights based on ensuring that the height of new buildings responds to and helps to define the surrounding character. In this regard, the greater level of control for specific locations afforded by Option 1 should have a positive effect in terms of protecting and enhancing townscape character and quality (and potentially improving legibility) whilst allowing high quality high rise development in suitable locations.	★ 1	2
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	Part of the Tottenham AAP area is in National Flood Zones 2 and 3. It is not possible to differentiate between the two options in terms of flood risk but development occurring under either option would be required to demonstrate how flood risk has been adequately addressed.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	The location specific approach to building heights allows for taller buildings in particular locations that have high public transport accessibility such as Tottenham Hale, Apex House and close to Northumberland Park station and White Hart Lane stations (the possible exception being adjacent to the stadium development at Northumberland Park). Focusing these high trip-generating developments in such locations will support increased sustainable transport use per capita.	★ 1	2

#### Summary

When considering the acceptable heights of new buildings it is necessary to consider the need to respond to, and where possible help to define, the surrounding character, as well as the need to make the most of opportunities for intensification and regeneration.

The locally specific approach to building height requirements would give a greater level of control/clarity over tall building location and design, with positive effects on selected town centres; protection and enhancement of townscape character and quality; and use of sustainable transport modes (by focusing these high trip-generating developments in locations that are highly accessible by public transport). Both options would contribute to housing delivery and economic growth. No significant effects were identified.

## APPENDIX V – AFFORDABLE HOUSING

### Introduction

Part 2 (above) presents summary appraisal findings in relation to the following alternatives for building heights policy:

**Option 1** - Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 60% intermediate accommodation (housing available at prices and rents above those of social rent but below market prices or rents) and 40% social/affordable rented accommodation (as per the AAP housing policy).

**Option 2** – Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 40% intermediate accommodation and 60% social/affordable rented accommodation (as per policy DM17 of the Development Management Policies and the Further Alterations to the London Plan).

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

### Methodology

See discussion in Appendix I.

### Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	No notable implications.	N/a	N/a
Housing	<p>Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham, partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability. Tottenham has very high levels of people living in temporary accommodation, and some newcomers are compelled to leave the area once they have established themselves more economically.</p> <p>The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling).</p> <p>The impact of both options on this objective are considered to be positive and significant in terms of improving the supply of affordable housing. Option 1 would provide more intermediate accommodation than option 2 and therefore would have a greater positive impact in terms rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. Therefore option 1 is the preferred option for addressing this objective.</p> <p>It is important to note however that both options are likely to contribute to positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 may lead to more marked changes on the existing make up of the local area, as it provides for more intermediate housing and less social/affordable rented housing.</p>	★ 1	2



Topic	Discussion	Opt 1	Opt 2
Community Cohesion	Both options are considered to have positive impacts on this objective over the medium term as they will help to create more stable and mixed communities. However in the short term the large scale regeneration may create disruption for existing residents, which will need to be managed as effectively as possible.	?	?
Accessibility	No notable implications.	N/a	N/a
Economic Growth	Both options are considered to have positive impacts on this objective by delivering a range of high quality housing that will attract more people and more wealth to the area, supporting local economic growth. Option 1 may have the greater impact on economic growth as it would create more intermediate housing than option 2, thus attracting more residents that are able to afford this form of housing and by extension more disposable income to spend locally.	★1	2
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	No notable implications.	N/a	N/a
Biodiversity	No notable implications.	N/a	N/a
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	No notable implications.	N/a	N/a
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	No notable implications.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
<p><u>Summary</u></p>	<p>Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability, with very high levels of people living in temporary accommodation and newcomers often leaving the area once they have established themselves more economically. The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling). Both options would support positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 would provide more intermediate accommodation and therefore would have a greater positive impact in terms rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. However, Option 1 might lead to more marked changes on the existing make up of the local area, potentially with implications for 'community cohesion' related objectives. It is important to note that the public consultation conducted on broad proposals for Tottenham (January 2014) highlighted concerns about the impacts of area change, including on housing affordability. The Council should consider means to monitor and where necessary mitigate impacts of development on residents.</p>		

## APPENDIX VI – GREEN LINK

### Introduction

Part 2 (above) presents summary appraisal findings in relation to the following alternatives for the Green Link:

**Option 1** - A Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area

**Option 2** - A Green Link between Tottenham High Road and the Lea Valley Regional Park along Dowsett Road and Park View Road

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

### Methodology

See discussion in Appendix I.

### Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	No notable implications.	N/a	N/a
Education	No notable implications.	N/a	N/a
Health	Both options could improve health by creating an attractive walking and cycling route to the Lee Valley Park, thereby encouraging increased physical exercise and the health and wellbeing benefits that flow from it.	1	1
Housing	No notable implications.	N/a	N/a
Community Cohesion	By providing better access to high quality public green space, both options could contribute positively to community cohesion by creating new opportunities for people from different backgrounds to interact and get involved in voluntary activities.	1	1
Accessibility	Both options should improve accessibility by foot and bike to essential services and amenities for those living near the Green Link, however Option 1 would have the greater positive impact by increasing access to the new district centre at Tottenham Hale from neighbouring residential areas to the west by foot and bike. Both options will also significantly improve access to the Lee Valley Regional Park, with option 1 again have the greater positive effect; this is because there is already a link across the railway line from Park View Road to Tottenham Marshes, thus option 2 would provide a more limited enhancement to existing access.	1	2
Economic Growth	No notable implications.	N/a	N/a
Skills and Training	No notable implications.	N/a	N/a
Economic Inclusion	No notable implications.	N/a	N/a
Town Centres	No notable implications.	N/a	N/a

Topic	Discussion	Opt 1	Opt 2
Biodiversity	The Green Link will include high quality landscaping and is envisaged as a bold green infrastructure investment; thus it could create some biodiversity value and/or perhaps act as a new wildlife corridor. It will also provide new opportunities for people to access wildlife and open green spaces. On the other hand, both options would increase the number of people using the Lee Valley Park, with potentially negative impacts on local ecology if visitor impacts are not carefully managed (e.g. within the Paddock Community Nature Park and Tottenham Marshes).	1?	1?
Townscape and Cultural Heritage	No notable implications.	N/a	N/a
Open Space	This Green Link will include high quality landscaping and is envisaged as a bold green infrastructure investment; however the extent to which this will provide open space as opposed to a transit route with green verges is unclear at this stage.	?	?
Water Resources	No notable implications.	N/a	N/a
Soil and Land Quality	No notable implications.	N/a	N/a
Flood Risk and Climate Change	It was judged that the alternative options would have little bearing on this topic. However it is noted that depending on the ground levels there may be scope to design the Green Link to act a sustainable drainage system, collecting, attenuating and treating rainwater runoff before discharging – subject to sufficient treatment – into the waterway.	N/a	N/a
Air Quality	No notable implications.	N/a	N/a
Noise	No notable implications.	N/a	N/a
Energy and Carbon	No notable implications.	N/a	N/a
Waste Management	No notable implications.	N/a	N/a
Sustainable Transport	Both options provide for new east-west walking and cycling routes between Tottenham High Road and Lee Valley Park, thereby significantly improving walking and cycling routes and reducing the need to use private cars for some local journeys (e.g. to access the Lee Valley Park). The impact is judged to be significant for both options, although option 1 is judged to have the greatest positive effect as there is already a link across the railway line from Park View Road to Tottenham Marshes, thus option 2 would provide a more limited enhancement.	1	2

Topic	Discussion	Opt 1	Opt 2
	<p><u>Summary</u></p> <p>Tottenham has very limited access to the Lee Valley Regional Park due to the barriers created by the railway line, large roads and waterways. Both options would seek to greatly improve east-west links to the park by creating attractive new walking and cycling routes. Consequently both options would have significant positive impacts on the sustainable transport and accessibility objectives, with option 1 judged to have the greater positive impacts as it creates a new route linking with Tottenham Hale.</p> <p>Both options are also anticipated to have indirect positive impacts on health and community cohesion as a result of use of these routes, and increased access to the Lee Valley Park, by a wide section of the local population.</p> <p>The extent to which both options would actually create new open space is unclear at this stage. The effects on biodiversity are also uncertain; the Green Link will include high quality landscaping that could create some biodiversity value and allow it to act as a wildlife corridor; it will also markedly improve access to wildlife and open green spaces. However, both options would increase the number of people using the Lee Valley Park, with potentially negative impacts on local ecology if visitor impacts are not carefully managed (e.g. within the Paddock Community Nature Park and Tottenham Marshes). The Council will need to work with Lee Valley Park to ensure that the potential negative impacts on biodiversity of increased use of the park can be managed effectively.</p> <p>There may be scope to design the Green Link to act a sustainable drainage system, collecting, attenuating and treating rainwater runoff before discharging – subject to sufficient treatment – into the waterway. This could help to mitigate surface water flood risk and add amenity and biodiversity value to the Green Link, if there is sufficient space. The Council should consider the scope for integrating SUDS features into the Green Link as the design is developed.</p>		