



Haringey Council

SCOPING REPORT

Tottenham Area Action Plans

January 2014

This report has been prepared on behalf of Haringey Council by:



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1 Introduction

1.1 Introduction

The London Borough of Haringey is currently preparing the [Tottenham Area Action Plans](#), which will support the Local Plan and provide the detailed planning guidance for development in this part of the borough. Two Area Action Plans (AAPs) are proposed for Tottenham; Northumberland Park and South Tottenham. The AAPs will provide the statutory planning documents for the area and be key components of Haringey's Local Plan portfolio.

The [Local Plan: Strategic Policies](#) document, 2013 is the primary strategic document in the Haringey Local Plan, and will guide planning and development in the borough for the next 15 years. The Local Plan alongside saved policies from the Unitary Development Plan 2006 sets out how the council will deliver development in the borough.

The Local Plan: Strategic Policies has been prepared as part of the Council's Local Plan in accordance with the Planning and Compulsory Purchase Act 2004. The Local Plan: Strategic Policies document was subjected to several rounds of public consultation, culminating in an Examination in Public by an independent Planning Inspector in 2011 and 2012. A further round of consultation took place in April 2012 in response to the changes that resulted from the introduction of the National Planning Policy Framework (NPPF). Following the publication of the Inspector's report in December 2012, the London Borough of Haringey formerly adopted its Local Plan: Strategic Policies in March 2013. A draft Development Management Document, Scoping Report (July 2012) and Interim Sustainability Appraisal (SA) (May 2013) have also been issued for public consultation.

This document draws on the previous reports for reference as well as the Sustainability Appraisal of the Local Plan: Strategic Policies, in order to avoid any duplication of effort, and sets out the issues and methodology for the Sustainability Appraisal for the issues that are specific for the Tottenham Area Action Plans.

1.2 Why is a Sustainability Appraisal needed?

Under section 19(5) of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is mandatory for new or revised Development Plan Documents (DPDs) or Area action Plans (AAPs). The appraisal should include an assessment of the likely significant impacts - economic, social and environmental - of the plan.

When conducting an SA of an AAP an environmental assessment must also be conducted in accordance with the requirements of European Directive 2001/42/EC (The Strategic Environmental Assessment Directive), transposed into the UK legislation by the Environmental Assessment of Plans and Programmes Regulations 2004, Section 12.

Sustainability Appraisals should be carried out in accordance with Government Guidance '[A Practical Guide to the SEA Directive, ODPM, 2005](#)' and the '[National Planning Policy Framework \(NPPF\) 2012](#)'. Sustainability Appraisal, as defined under the Planning and Compulsory Purchase Act, fully incorporates the requirements of the SEA directive. The term SA is therefore used to refer to the combined assessment.

1.3 What is this document?

This document provides the [Scoping Report](#) for the SA of the Tottenham Area Action Plans. The Scoping report is the **first stage** of the sustainability appraisal process and sets the context and scope of the SA in accordance with best practice guidance. The report includes:

- Sustainability appraisal methodology
- Policies, plans and programmes of relevance to the DPD
- Summary of the baseline data for the area
- Sustainability issues and opportunities
- Sustainability appraisal framework - including the objectives and indicators that will be used to measure the impacts of the plan upon sustainable development
- Draft content of the Sustainability Report.

1.4 Consultation process

The Scoping Report will be forwarded to statutory consultees to ensure that the proposed scope of work is appropriate, including:

- The Environment Agency
- Natural England
- English Heritage

The Greater London Authority, neighbouring local authorities and other key stakeholders will also be consulted. Following consultation of the Scoping Report, the Council will prepare a full sustainability appraisal of the Area Action Plans in accordance with the regulations. The draft Sustainability Report will be issued for consultation alongside the Area Action Plans.

1.5 Consultation Questions

Consultees are welcome to comment or provide input on any aspect of the content and processes outlined in this report and are asked, in particular, to consider the following:

1. Plans and Programmes

Are there any plans, policies and programmes set out in **Appendix A1** that have not been included which are particularly relevant to the sustainability appraisal of the AAPs?

2. Baseline Data

Are there any sources of baseline data in **Section 5 and Appendix A2**, which have been omitted and should be considered as part of the SA and development of the AAPs?

3. Sustainability Issues and Objectives

Do any of the sustainability issues and objectives in **Section 6** need to be added to or amended? If so please state why.

4. Sustainability Appraisal Framework

Are the objectives and indicators set out in the SA Framework in **Section 7** appropriate?

5. Sustainability Report and Methodology

Is the proposed structure of the Sustainability Report and methodology in **Section 8** suitable? Is the methodology clear and complete?

The consultation on this document will run from **17 January – 7 March 2014**.

Responses should be sent to:

ldf@haringey.gov.uk

or you can comment on the document online at:
www.haringey.gov.uk/local_development_framework

or by post to:

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2 The Tottenham Area Action Plans

2.1 What is the purpose of the AAPs?

Tottenham is the most significant development opportunity in London for the next ten years. The ambition to regenerate Tottenham is reflected in regional and local planning policy designations including:

- **The London Plan** - indicates Tottenham Hale as a growth point and the wider Tottenham area as an Opportunity Area
- **Upper Lee Valley Opportunity Area Planning Framework** – designates Tottenham as a growth area
- **Haringey's Local Plan: Strategic Policies** – designates Tottenham Hale as a Growth Area and Northumberland Park, Tottenham High Road/Bruce Grove (including Tottenham Green) as an Area of Change.

Two Area Action Plans (AAPs) are proposed for Tottenham: Northumberland Park; and South Tottenham. The AAPs will provide the statutory planning documents for the area and be key components of Haringey's Local Plan portfolio. The AAPs will be separate but inter-related and will provide a comprehensive spatial strategy for development, which reflects the community's aspirations for the area. The AAPs will also provide guidance on how the policies in the Local Plan: Strategic Policies will be implemented, including specific policy and the allocation of land for certain sites. The AAPs will be developed in the context of other key emerging local DPD documents, including the Site Allocations DPD and Development Management DPD, which will set out detailed planning policy on a range of development issues.

The AAPs will be informed by a number of plans and frameworks for the regeneration of the area. These include:

- The Tottenham Strategic Regeneration Framework, 2013
- The Draft Tottenham Physical Development Framework, 2013
- The Housing Investment and Estate Renewal Strategy 2013-23
- A Plan for Tottenham 2012-25
- The Draft High Road West Concept Masterplan, 2012 and Masterplan Option Consultation Feedback and Next Steps
- The Tottenham High Road Strategy, 2006
- Transforming Tottenham Hale Urban Centre Masterplan, 2006

The Plan for Tottenham sets out a vision for Tottenham and the key economic and physical activities and investment to deliver the key five-point plan for change:

1. Transform Northumberland Park into north London's premier leisure destination with new high quality housing and improved transport options
2. Create a fun, civic heart at Tottenham Green and turn Seven Sisters into an impressive gateway into Tottenham
3. Promote Tottenham Hale as a new centre for growth, exploiting excellent transport connections
4. Consolidate and revitalise the retail experience on the High Road
5. Improve the quality of life for everyone – encourage investment, jobs, economic growth, quality housing and strong neighbourhoods.

2.2 What are the objectives of the AAPs?

The Area Action Plans divide the Tottenham area for regeneration into 2 parts:

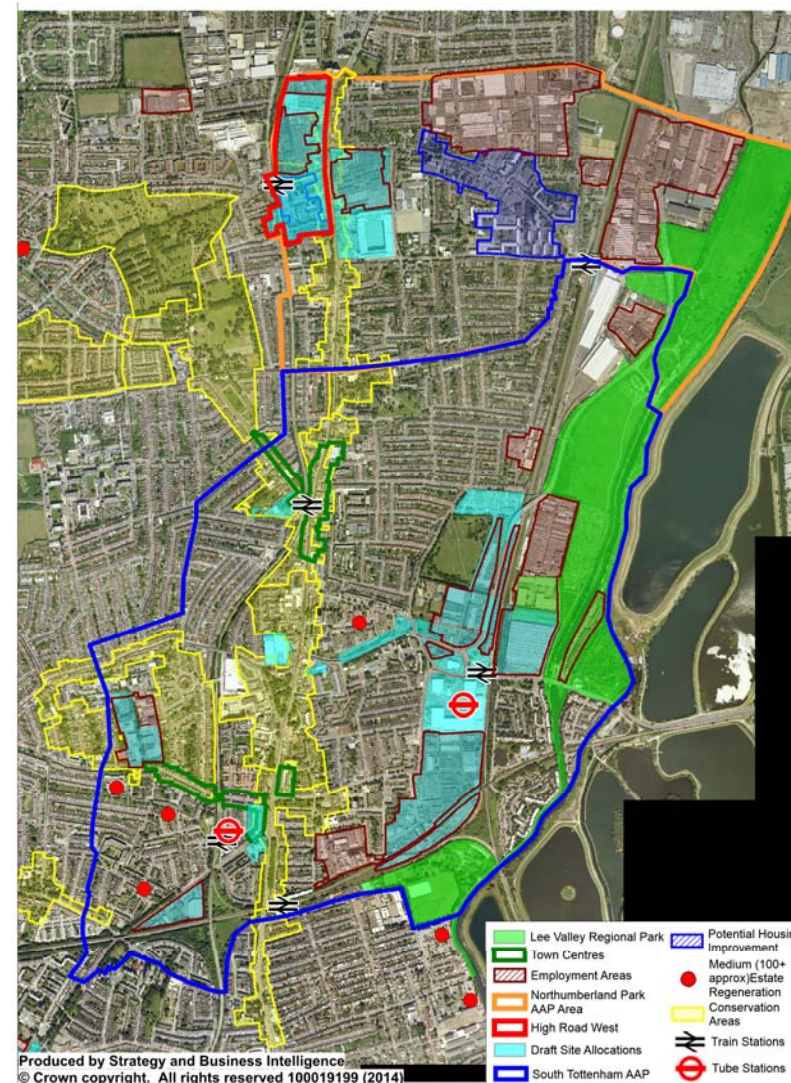
1. **Northumberland Park** (including Northumberland Park Area of change; and High Road West)
2. **South Tottenham** (including Tottenham Hale Growth Area; Bruce Grove Area of change; and the Tottenham Green area)

The aim of the AAPs is to reduce unnecessary complexity and burdens for all parties engaged in the process. The policies are intended not only to control land but also to promote sustainable development, which will be a key part of their implementation.

The policies will play a pivotal role in delivering the overall vision and objectives for the borough, as outlined in the Local Plan: Strategic Policies and the Plan for Tottenham. The documents should therefore be considered together. Attention will also be given to the National Planning Policy Framework (NPPF) 2012 and the London Plan 2011 when making decisions on planning applications.

The objectives of the AAPs are as follows:

- To facilitate and deliver the regeneration of Tottenham
- To produce two co-ordinated spatial strategies, which will deliver Tottenham's place shaping agenda and reflect the communities aspirations for an area.
- To produce proactive planning policies which aid in delivering high quality development
- To help set the parameters for co-ordinated land assembly and positive development through possible compulsory purchase orders
- To assess any existing planning designations such as employments land and town centre designations.
- To help elicit investor confidence in Tottenham through the a strong focus on delivery and implementation



2.3 Timetable for the production of the AAPs

The timetable for the production of the AAPs is as follows:

- Evidence gathering and drafting document
October 2013 – January 2014
- Cabinet approval for consultation
28 November 2013
- Regulation 18 public consultation on draft AAPs and Scoping Report (6 weeks)
17 January – 28 February 2014
- Analysis of consultation outcomes, complete evidence studies and prepare the Proposed Submission Draft AAPs
March – September 2014
- Cabinet and Full Council to approve proposed submission AAPs and Sustainability Report for consultation
October 2014
- Regulation 19 public consultation on proposed submission AAPs and Sustainability Report (6 weeks)
October - November 2014
- Submission to Planning Inspectorate
March 2015
- Examination in Public (estimated)
June 2015
- Adoption
December 2015

3 Sustainability Appraisal Methodology

3.1 Purpose of the Sustainability Appraisal

The purpose of the Sustainability Appraisal (SA) is to ensure that sustainable development has been integrated in the formulation of development plans and to verify that due consideration has been given to social, economic and environmental factors. The SA must also show how the requirements of the Strategic Environmental Assessment (SEA) Directive have been met.

3.2 Planning Policy and Sustainable Development

The National Planning Policy Framework (NPPF) was published in March 2012. The NPPF must be taken into account in the preparation of local plans and is a material consideration in planning decisions. Planning policies and decisions must also reflect and, where appropriate, promote relevant EU obligations and statutory requirements.

‘meeting the needs of the present without compromising the ability of future generations to meet their own needs’

Definition of Sustainable Development, Brundtland

The purpose of the planning system is to contribute to the achievement of sustainable development as defined in the Brundtland definition. The definition of sustainable development is also set out in the UK Sustainable development Strategy ‘Securing the future - delivering the UK Sustainable Development Strategy, 2005’. The document sets out the guiding principles for sustainable development and priorities for action. The strategy sets out five guiding principles to achieve sustainable development:

- Living within environmental limits
- Ensuring a strong, healthy and just society
- Achieving a sustainable economy
- Promoting good governance
- Using sound science responsibly

The Strategy also gives the following priorities for action:

- Sustainable consumption and production
- Climate Change and Energy
- Natural Resource Protection and Environmental Enhancement
- Sustainable Communities.

3.3 The Sustainability Appraisal Process

The Sustainability Appraisal of the AAPS will be carried out in accordance with the relevant Regulations and Government policy and guidance, as set out below:

- European Directive 2001/42/EC (The Strategic Environmental Assessment Directive)
- EC Guidance on the SEA Directive – Implementation of Directive 2001/42 on the assessment of the effects of certain plans and programmes on the environment, September 2003
- Environmental Assessment of Plans and Programmes Regulations 2004, Section 12
- The Planning and Compulsory Purchase Act 2004, Section 19(5)
- A Practical Guide to the Strategic Environmental Assessment Directive, 2005
- Local Development Frameworks: Examining Development Plan Documents – Soundness Guidance, Planning Inspectorate, August 2009 and update February 2010
- Local Development Frameworks: Examining Development Plan Documents – Learning from Experience, September 2009
- The National Planning Policy Framework, 2012
- Draft National Planning Practice Guidance, 2013

3.4 Stages of the SA Process

The stages of the SA process are set out opposite. It should be noted that SA is an iterative process and some stages may need to be undertaken more than once. This report is [Stage A](#). The requirements of the SEA Directive are set out in [Appendix A4](#).

STAGE A: SCOPING REPORT	
A1:	Identify other relevant plans, programmes and sustainability objectives
A2:	Collect baseline information
A3:	Identify sustainability issues and problems
A4:	Develop SA framework, including objectives, indicators and targets
A5:	Consult on the Scope of the SA
STAGE B: DEVELOP/REFINE OPTIONS & ASSESS EFFECTS	
B1:	Test the plan or programme objectives against the SA framework
B2:	Develop the AAP options/alternatives
B3:	Predict the effects of the AAP, including options/alternatives
B4:	Evaluate the effects of the AAP, including options/alternatives
B5:	Consider ways of mitigating adverse effects and maximising beneficial effects
B6:	Propose measures to monitor the sustainability effects of the plan or programme implementation
STAGE C: PREPARE THE SUSTAINABILITY REPORT	
C1:	Prepare the Sustainability Report
STAGE D: CONSULT ON THE DRAFT PLAN AND SA REPORT	
D1:	Consult on the draft AAP and Sustainability Report
D2:	Assess any significant changes as a result of the consultation
D3:	Finalise Sustainability Report and prepare Sustainability Statement
STAGE E: MONITOR IMPLEMENTATION OF THE PLAN	
E1:	Develop aims and methods for monitoring
E2:	Respond to any adverse effects

3.5 Consultation

As part of the preparation of the Area Action Plans, public consultation will be carried out to make sure that local residents and stakeholders are informed and can contribute to the future policies for the borough.

Consultation on the Area Action Plans is being carried out in accordance with the Statement of Community Involvement (SCI) 2011 (update 2012). The SCI sets out how individuals, community groups, developers and anyone else who may have an interest in the Local Plan should be consulted on planning documents.

SEA guidance requires that the ‘authorities with environmental responsibility’ must be consulted regarding the contents of the scoping report, which includes:

- Natural England
- The Environment Agency
- English Heritage.

Government guidance also recommends that additional bodies can be consulted in order to represent the social and economic aspects of sustainability.

Duty to Co-operate

The ‘Duty to Co-operate’ is a statutory duty. Section 110 of the Localism Act 2011 inserts section 33A and section 20(5) (c) into the Planning and Compulsory Purchase Act 2004 (PCPA 2004). Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed (being those identified in regulation 4 of the Town and Country Planning (Local Planning) (England) Regulations 2012).

The National Planning Policy Framework (NPPF) states that public bodies have a duty to co-operate on planning issues that cross administrative boundaries, particularly those which relate to strategic priorities. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities (para. 178).

The NPPF provides some guidance on what could be considered as a “strategic matter”. It outlines that local planning authorities should set out the strategic priorities for the area in the Local Plan (para. 156). This should include strategic policies to deliver:

- the homes and jobs needed in the area
- the provision of retail, leisure and other commercial development
- the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)
- the provision of health, security, community and cultural infrastructure and other local facilities
- climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.

Paragraph 181 of the NPPF states that ‘Local Planning Authorities will be expected to demonstrate evidence of having successfully cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination’.

The following additional bodies will be consulted, in addition to key local consultees:

- Department for Communities and Local Government
- Greater London Authority
- Highways Agency
- London Borough of Barnet
- London Borough of Camden
- London Borough of Enfield
- London Borough of Hackney
- London Borough of Islington
- London Borough of Waltham Forest
- National Grid
- Network Rail
- Thames Water.

4 Links to Plans, Policies & Programmes

4.1 Links to other policies, plans and programmes

Stage A1 of the SA process, involves the identification of the relevant plans, programmes and sustainability objectives. The purpose of this exercise is to establish how the plan or programme is affected by outside factors and to suggest ideas for how any constraints can be addressed. This stage should also help identify the Sustainability Objectives.

The plans, programmes and sustainability objectives that need to be considered include those at international, national, regional and local scale. The plans and programmes are set out in [Appendix A1](#).

Question 1: Plans and Programmes

Are there any plans, policies and programmes as set out in [Appendix A1](#) that have not been included, which are particularly relevant to the sustainability appraisal of the AAPs?

4.2 Review of policies, plans and programmes

This Scoping report has taken the review of documents that was undertaken for the SA of the Local Plan: Strategic Policies (formerly Core strategy) and draft Development Management DPD as its starting point in order to avoid any duplication of effort (Article 4 of SEA Directive). The information has been updated to reflect changes to policies, plans and programmes that have occurred since the last review and to add Tottenham specific documents.

Further details of the documents referred to are set out in [Appendix A1](#).

5 Baseline Information

5.1 Collecting baseline information

Stage A2 of the SA process requires the collection of baseline information to provide an evidence base for the sustainability issues in the plan area in order to enable the selection of the sustainability issues and objectives, the prediction of effects and future monitoring.

As set out in the SEA Directive Annex 1 (b and c), the information to be provided must include:

‘The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme’ and

‘The environmental characteristics of areas likely to be significantly affected’ SEA Directive

The baseline data is set out in [Appendix A2](#). The data correlates to the set of sustainability indicators, which are used for monitoring the effectiveness of the borough’s planning policies. The data presented whilst considered to be comprehensive, is not exhaustive. Any additional data identified or supplied by the consultation bodies will be welcomed. Where gaps in data have been identified, these are clearly marked. Some data will also be the subject of further studies that are being carried out in support of the Area Action Plans and SA. The baseline data will be updated as information becomes available and the final baseline data set will be issued in support of the Sustainability Report.

A summary of the baseline data and key trends in relation to Tottenham is set out below. This information draws upon the baseline data that was collected for the Local Plan: Strategic Policies and the draft Development Management Document. The data has been updated where necessary. This evidence base includes but is not limited to, the following documents:

- Borough Profile Documents
- Census information 2011 & Indices of Multiple Deprivation 2010
- Haringey Annual Monitoring Report 2011/12
- Haringey Affordable Housing Viability Study 2010
- North London Strategic Housing Market Assessment 2011
- Greater London Strategic Housing Land Availability Assessment 2013
- Haringey Retail Study April 2013
- Haringey Employment Study 2008 and update January 2012 (further update due 2014)
- North London Level 1 Strategic Flood Risk Assessment 2008
- Haringey Level 2 SFRA March 2013
- Open Space Study 2004 (updated 2008, further update due 2014)
- Haringey Biodiversity Action Plan 2009
- Community Infrastructure Plan 2010
- Haringey Homelessness Strategy 2011-2014
- Infrastructure Delivery Plan 2011 and update 2013
- Haringey Local Plan: Strategic Policies 2013-26
- Upper Lee Valley Opportunity Area Planning Framework, 2013
- The London Plan 2011
- Urban Characterisation Study (due 2014)

The key sources of data for the Tottenham Area Action Plans include:

- The Tottenham Strategic Regeneration Framework, 2013
- The Draft Tottenham Physical Development Framework, 2013
- The Housing Investment and Estate Renewal Strategy 2013-23
- ‘From Around Here’ Review of industrial uses and outputs in some key employment areas in Tottenham, 2013
- A Plan for Tottenham 2012-25
- The Draft High Road West Concept Masterplan, 2012 and Masterplan Option Consultation Feedback/Next Steps
- The Tottenham High Road Strategy, 2006
- Transforming Tottenham Hale Urban Centre Masterplan, 2006

The AAPs will also be informed by the following emerging strategies:

- Urban Characterisation Study
- Open Space and Biodiversity Study
- Employment Land Study Update

The baseline data for the Borough can be found in the Scoping Report for the Site Allocations Development Plan Document (also issued for consultation in January 2014). A summary of the baseline information in relation to the Tottenham Area Action Plans is provided below.

Question 2: Baseline Data

Are there any sources of baseline data in the section below and **Appendix A2**, which have been omitted and should be considered as part of the SA and development of the AAPs?

Tottenham Area Action Plan Areas

5.2 The Area Action Plan Areas

Tottenham is the most significant development opportunity in London for the next ten years. There is an opportunity to make better places for people to live, work and visit as a major London destination. The AAPs will provide a statutory planning framework for development and have the potential to help deliver:

- Up to 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 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
- Major transport improvements through the Government's £500m borrowing guarantee to support housing and transport infrastructure in Tottenham
- Transport for London's ongoing delivery of the £40m gyratory improvement scheme to unlock development sites near Tottenham Hale
- Sustainable forms of energy and the promotion of low and zero carbon energy generation

There are two Tottenham Area Action Plan Areas, which include the following areas and sub areas:

- **Northumberland Park**
 - **Northumberland Park**
 - **High Road West**
- **South Tottenham**
 - **Tottenham Hale**
 - **Bruce Grove**
 - **Tottenham Green**

Northumberland Park

– **Northumberland Park**

The Northumberland Park area is located in north Tottenham adjacent to the borough boundary with the London Borough of Enfield and the Lee Valley Regional Park. The area extends south to Landsdowne Road and west to the High Road West area.

The area to the east of the Lee Valley main line is predominantly industrial in use, with Garman, Leaside Industrial and Marsh Lane Estates all located in this area. The industrial areas are dissected by Watermead Way, which provides a key link to the A406 North Circular road. An area of allotments is located off Marsh Lane/Marigold Road.

Major rail infrastructure is located to the south with a Victoria Line depot and Network Rail sidings between Northumberland Park Station and Marsh Lane. The area is served by an infrequent stopping service. Two bus depots are also located in this area, one on Leaside Industrial Estate (which National Grid has identified needs to be relocated as part of works to the Tottenham Marsh Transformer Station) and one on Marsh Lane.

The easternmost part of the area comprises the open space between the industrial areas and the Lee Navigation. Stonebridge Lock Waterside Centre with its car park accessed off Watermead Way and a small community of houseboats are located in this area, which acts as a key gateway to the Lea Valley Regional Park for this part of Tottenham.

Housing makes up the rest of the Northumberland Park area, with local authority housing estates found between Tottenham Hotspurs FC and Northumberland Park station. Victorian terraces predominantly make up the southern part of the area between Park Lane and Lansdowne Road.

The proposed Meridian Water redevelopment is located to the north east of this area, in the London Borough of Enfield in the area around Tesco and Ikea.

– High Road West

The High Road West area is at the northern end of the High Road. The area extends from Brook House in the north to Brereton Road to the south, with the High Road running north-south through the centre.

Within the southern part of High Road West are areas of predominantly local authority housing including the Love Lane and Whitehall Street Estates. The estates were built in the 1960's and include three ten storey 'Y' shaped blocks and several six storey slab blocks. The High Road in this part of Tottenham provides a local centre, but is run-down and in need of investment.

The elevated railway line and White Hart Lane station form a western edge to the area with limited crossing points. The train station entrance fronts onto White Hart Lane and provides a relatively frequent service to Seven Sisters (for Victoria Line interchange), central London and Enfield Town, but does not have a good visual link to the High Road.

To the east of the High Road is Tottenham Hotspurs Football Club (THFC). In February 2012 LB Haringey granted planning permission for the new THFC stadium development, which comprises demolition and comprehensive redevelopment of the stadium with a hotel, retail, museum, offices and housing. The redevelopment of the stadium site will be delivered in phases starting in the north and moving south. The first phase of works has commenced with a new Sainsbury's supermarket coming forward on the site that fronts Northumberland Park Road (the existing Sainsbury's on the High road will close). The new stadium, which will increase spectator capacity to 56,000 will then be built whilst the existing stadium continues to operate. The existing stadium will then be demolished in order to allow new retail, hotel and residential development at the southern end of the site. A joint bid for a University Technical College on part of the site was secured in May 2013 in partnership with Middlesex University.

South Tottenham

– Tottenham Hale

Tottenham Hale Station anchors Tottenham Hale. The station has the best public transport accessibility in the Upper Lee Valley with a significant interchange between local buses, the Victoria Line and National Rail trains into London Liverpool Street and Stratford; and north to Stansted, Cheshunt and Cambridge. Planned investment in the transport infrastructure will further improve the transport links.

To the east of the rail line is the near complete Hale Village with up to 1,250 homes, 750 units of student accommodation, office, retail, health and community facilities. To the east of the Lee Navigation is Hale Wharf and a small business community on the canal.

North of Hale Village are the Millmead and Lockwood Industrial Estates, which are designated in the London Plan as Strategic Industrial Land, as well as the Lea Valley Regional Park and an area of allotments, both in the Green Belt.

North-west of Tottenham Hale Station is the Ashley Road area, which comprises a light industrial estate leading to the Techno Park, a purpose built office development and Down Lane Park, which includes tennis courts and a children's centre. Local schools use the park for physical education classes.

To the north of Ashley Road is Ashley Road Waste Depot with Victorian housing beyond. Tottenham Hale extends west along Monument Way to incorporate the High Cross, Chesnut and Colsterworth housing estates. The area includes Tottenham Hale Retail Park and South Tottenham industrial area (Fountayne Road and Markfield Road Estates) with Markfield Park forming the southern boundary. This area also includes the Rangemoor Road industrial area. The retail park contains the majority of multiple retailers within the Tottenham area. The industrial area has a mix of uses, including offices and live work accommodation for artist residences and creative industries.

The area benefits from excellent road access with direct access via Watermead Way to the A406 and Forest Road to the north east. However, the area is currently dissected by a one-way road system – ‘the gyratory’. Transport for London is currently implementing improvements to the gyratory to make it two-way, improve the pedestrian/cyclist experience and improve the setting of the area.

– **Bruce Grove**

The Bruce Grove area is located approximately half way down the High Road, with Bruce Grove station at its heart. The area extends north to Reform Row and south to St. Loy’s Road. To the west the area is bordered by the elevated railway line and viaduct, whilst to the east is predominantly Victorian housing interspersed with more modern blocks.

Bruce Grove is a focal point for retail on the High Road, comprising a long linear retail pitch of mainly independent retailers trading from ‘traditional’ high street units; small ground floor sales areas with residential or office uses on one or two floors above. This area was significantly affected by the riots in 2011, with several buildings burnt out.

– **Tottenham Green**

Tottenham Green/Seven Sisters is at the southern end of the High Road and is the gateway to Tottenham. Retail is clustered to the south of the area, with civic and cultural uses to the north and residential beyond.

Seven Sisters Underground and National Rail station is located at the cross-roads and provides a focal point for activity in this area. Between the station and Tottenham Green is mixture of predominantly non-retail uses although it includes a Tesco, which fronts directly onto the High Road.

Tottenham Green straddles the High Road at the northern end of this area and consists of landscaped open space with mature trees surrounded by period buildings. The Green is currently used for informal recreation.

Surrounding Tottenham Green is a range of uses including: residential; civic; educational; and cultural/leisure. Residential uses predominate to the east of the Green; whilst to the west is the College of Haringey, Enfield and North East London (CHENEL), the former Town Hall, the former Fire Station, the Bernie Grant Arts Centre and the Tottenham Green Leisure Centre and Library. Holy Trinity Church is located at the north end of the Green and operates a nursery. North of the Green is the Arriva bus garage. See pages 45 and 46 for maps showing some of the issues, opportunities and challenges facing Tottenham’s regeneration.

Socio-Economic Characteristics

5.3 Overview

The area defined as Tottenham covers the 8 wards that are the most easterly in Haringey. These are: White Hart Lane, Northumberland Park, West Green, Tottenham Hale, Bruce Grove, St Ann's, Seven Sisters and Tottenham Green. Details of the statistics for each of the individual ward profiles can be found on the Council website

- 88% of Tottenham is in the top 20% most deprived nationally, 15% of Tottenham is in the top 5% most deprived.
- There is a high proportion of under 20s in Tottenham compared to Haringey and nationally suggesting an increased need for services aimed at mothers, children and young people.
- A higher than average proportion of residents are from ethnic backgrounds (over three quarters); most notably Black Caribbean, Black African and Other White groups.
- A high proportion of residents is employed in low level jobs or is receiving benefits.
- Crime is high in Tottenham compared to Haringey. Significant criminal activities in the ward include theft and handling and violence against the person.
- Male life expectancy is low compared to the Haringey average.

5.4 Population

In common with the rest of London, Haringey is expected to experience rapid growth in population, which will bring with it pressure for new housing and associated infrastructure. Each of Haringey's growth areas has been identified in the London Plan as having potential for significant increases in jobs and homes. The growth areas include Haringey Heartlands/Wood Green and Tottenham Hale.

The Census 2011 gives the current population for Tottenham as 129,237, which comprises 10,532 households, an increase of 18% since 2001. Over a third of households have dependant children and Tottenham has a higher proportion of young adults and a lower proportion of older people than the rest of Haringey.

5.5 Deprivation and Crime

Tottenham is made up of 65 Lower Super Output Areas¹ of which 57 (88%) are amongst the top 20% most deprived in the country, 34 (52%) amongst the 10% most deprived and 10 (15%) amongst the 5% most deprived. The indices of deprivation are published at Local Super Output Area (LSOA) level enabling an average deprivation score to be developed for a ward. Based on this Northumberland Park is the most deprived ward in Haringey, and of the top 10 most deprived wards 8 of them are in Tottenham.

The indices of deprivation are based on a number of different statistics; these include income deprivation, crime, housing, health and access to services.

Deprivation - With between 5,000 and 6,000 households in each ward, the eight wards that make up Tottenham accommodate almost half of the people living in Haringey. They are ranked among the 10 per cent most deprived in England and among the 5 per cent most deprived against the 'Barriers to Housing and Services' element of the Index of Multiple Deprivation 2010.

¹ A Lower Super Output Area is a low level geography that fits with an electoral ward. Wards in Haringey have either 7 or 8 in each ward. Census statistics are available at LSOA level geography.

Low income: At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London. Low wages act as a barrier to home ownership and limit residents' housing options. 12.4% of Tottenham Hale's working age population is claiming Job Seekers Allowance. This is more than 2½ times the average rate for London (4.4%).

Child poverty: Approximately 48% of the children in Tottenham are living in poverty. Overall, 40 per cent of the children in Haringey live in poverty (8th highest in England). Despite two decades of regeneration activity, the life chances of Tottenham residents have hardly improved, and the average male life expectancy in Tottenham Green (72) is five years less than the average male life expectancy in London.

5.6 Housing

Tenure mix: The 2011 census shows that home ownership has decreased to 38% of households with 2,901 fewer homes owned than in 2001 with the proportion of households that are privately rented increasing significantly to 31.5%, amongst the highest of all London Boroughs. Over occupancy is also up significantly with 16.3% of households now over-occupied by at least 1 bedroom, much higher than the London rate of 11.6%.

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. Over 60% of all social housing in the borough is located in the Tottenham wards.

Levels of private rented accommodation: It is acknowledged that the amount of private rented accommodation in Tottenham has increased substantially during the last decade. High house prices, stricter mortgage eligibility criteria and strong demand have fuelled an increase in the level of private renting in London with an estimated 25% growth over the last five years.

Migrant workers in private rented accommodation: Increased demand for low cost private rented accommodation has also resulted from a sharp rise in the number of migrant workers coming to Haringey. Between 2002/3 and 2010/11, the Department for Work and Pensions completed just over 91,000 new national insurance registrations for overseas nationals in Haringey (the 4th highest in London). 67% of these migrant workers recorded Tottenham as their home.

Temporary accommodation: Although the Council has nearly halved its use of temporary accommodation during the last five years, there are currently just under 3,000 homeless households (including 1,884 families with children) living in temporary accommodation. Half of these households are living in Tottenham (Feb 2012).

Overcrowding: According to the 2001 Census, 25.4% of households in Tottenham were overcrowded compared with 22.2% for Haringey and 17.3% for London.

Housing Benefit claimants (private rented sector) in Tottenham: Evidence of the growth in Tottenham's private rented sector is reflected in the number of 'live' Housing Benefit claims for accommodation in Tottenham. A comparison of the number of claimants in each ward in 2011 with the figures for 2001 suggests that there has been a substantial increase in private rented housing during the last decade.

Growing demand for low cost private rented accommodation: The growing demand for low cost private rented accommodation has prompted low income households to migrate from Central London to areas such as Tottenham where housing costs are lower. This has created a housing market that is very lucrative for rogue landlords. Restrictions on the amount of Housing Benefit that can be claimed by single people under the age of 35 have also substantially increased the demand for shared housing.

Substandard accommodation: Poor quality property conversions (often carried out without planning permission or building regulations approval) create overcrowding, compromise amenity and fire safety standards and result in substandard housing. Complaints about the standard of private rented accommodation are concentrated on properties that are situated in the east of the borough, with particularly high numbers in Bruce Grove and north of the High Road in Northumberland Park. The absence or inadequacy of fire precautions and home security are the main concern.

Empty homes in Tottenham: 141 empty homes were brought back into use with funding from the North London Sub Region in the past 7 years, 111 (79%) are in Tottenham. 118 empty homes were also brought back into use through enforcement action in the past 5 years, 81 (69%) are in Tottenham. The Cabinet has agreed to compulsorily purchase 22 empty homes, 15 of which (68%) are in Tottenham. Of the 67 empty homes that are being dealt with under the Compulsory Purchase Order process, 38 (57%) are situated in N15 or N17 and 13 of these properties are currently squatted. Of the 35 empty homes for which the Council is seeking an enforced sale, 18 (51%) are in Tottenham.

Estate renewal: The large estates in Tottenham have typically suffered from low levels of employment, education attainment, household income and life expectancy and high levels of overcrowding, crime and benefit dependency. There are a number of estates where the cost of improving properties to meet the Decent Homes Standard is uneconomical. The proposed programme of estate renewal in Tottenham provides the opportunity to address the proportion of Haringey's housing that makes poor use of available land and that has negatively affected the quantum and quality of the housing provided. Specific consultation on the housing conditions of all large estates in Tottenham is to take place in 2014. The Council's new build and estate renewal programmes will attempt to provide a mix of tenure types to help create local and eventually wider area balance.

New housing supply: Haringey's housing trajectory shows an upward trend in new housing delivery over the coming years, facilitated by major regeneration at Tottenham Hale, Haringey Heartlands and in Northumberland Park among others. Tottenham's brownfield sites account for much of the borough's future capacity for new development. Despite the economic downturn, the numbers of additional new houses delivered in 2011/12 was almost on target. Haringey's annual housing target is for 820 new units, of which 50% are to be affordable. In 2011/12, 1,065 new housing units were completed. Taking into account demolitions and conversions, the total net additional housing figure for 2011/12 was 818, 100% of which were built on previously developed land.

Age: From the profile of homelessness in Haringey, we know that on average, 40% of priority needs are young people aged 16-24; 34% are Black or Black British – three times their size in the local population; and lone female parents make up almost half of all households accepted by Haringey as in priority housing needs. (Haringey Homelessness Strategy 2011-2014)

Ethnicity: Residents from Black and Black British backgrounds are over-represented amongst Haringey's social rented residents, with 40% of Black African and Asian households living in unsuitable accommodation.

5.7 Health

Self-assessment of health in the borough is in line with national levels and London levels, with 49.6% of people in Haringey expressing they were in very good health in the 2011 Census. Overall, life expectancy rates in Haringey are increasing and are expected to improve further. Average life expectancy for men is 76 and for women 83 (2010). Average life expectancy in London is 78 for men and 83 for women. The national averages are 78 for men and 82 for women.

There are big differences in male life expectancy across the borough. On average a man living in Tottenham Green ward lives 9 years less than a man living in Fortis Green. The death rate has been consistently higher than London in this period. The main health problems are cancer, cardiovascular and respiratory disease which account for about 60% of deaths in the under 75 population.

Health inequalities in Haringey are evident; the most deprived areas tend to experience the poorest health. Fifty five (out of 144) Lower Super Output Areas within Haringey are considered to be in the 20% most deprived in England.

An assessment of child obesity in Haringey showed high levels of obesity in children across the borough and identified wards with the highest prevalence of child obesity corresponding to those with a higher density of fast food outlets and lower density of open spaces. Access to sports, recreational facilities and open spaces all help to encourage active lifestyles. There are sports and leisure facilities at Tottenham Leisure Centre, Park Road Pools, White Hart Lane Community Centre and Finsbury Park Track and Gym. There are also public swimming pools in Tottenham Green, Park Road, and Northumberland Park.

In terms of outdoor sports provision, there are football pitches at Northumberland Park, White Hart and Hornsey while others are being developed at Fortismere, White Hart Lane and Highgate Wood. However, the Open Space and Sports Assessment 2008 identified deficiencies and gaps in provision of sports facilities across the borough and that the quality of playing pitch provision was varied. There is a lack of accessible indoor football, poor quality and lack of pitches and ancillary facilities and a shortage of indoor tennis facilities. Participation rates in Haringey for outdoor sports are below the national average.

Initial findings from the Council's Community Infrastructure Plan (2010) show that the anticipated growth in population will generate a need for additional GPs, particularly in the east and south east of the borough as well as the potential need for a new district level combination swimming pool and leisure centre to meet the predicted population growth.

5.8 Education

In 2008, 59.7% of pupils in Haringey gained 5+ A*-C grades at GCSE or equivalent compared to a national average of 65.3%. Six out of 144 Lower Super Output Areas within Haringey are considered to be in the 20% most deprived in England. Educational attainment is lowest in White Hart Lane, Northumberland Park and Seven Sisters. Improving educational attainment in the borough is a key factor in reducing unemployment.

There are also 34 primary schools, 5 Secondary Schools and 10 Children's centres in the Tottenham area. It is anticipated that by September 2014 additional school capacity will be required at Tottenham Hale to respond to new housing developments. The child yield assessment for Hale Village concluded that there will be an increase in demand for an additional 60 reception places and 210 primary school places, despite some current surplus capacity across the six local primary schools. Additional primary capacity will also be required in the Northumberland Park ward as the local area is already close to capacity for school places. Scope for expansion in the north east of the borough is very limited within the schools in Northumberland Park, it is therefore anticipated that a new site for a primary school will be required

In 2009, the College of North East London located in Tottenham Green merged with Enfield College to become the College of Haringey, Enfield and North East London (CHENEL). This is the only College in Haringey. At Tottenham there are over 2,000 full time 16-19 year old students and 9,000 adult learners of which 2,800 are full time.

5.9 Community and Cultural Facilities

Haringey has a good range of community facilities that are provided by the Council or the voluntary sector including many meeting places, churches, synagogues, community facilities and prayer centres that cater for a range of faiths and beliefs. The protection of existing community facilities in the borough and the delivery of new infrastructure will play a key role in improving the lives of residents of Haringey. The Council will seek to support community organisations and religious groups to help them to meet their need for specific community facilities.

The borough boasts many cultural attractions such as Alexandra Palace, Bruce Castle Museum, Bernie Grant Arts Centre and Tottenham Hotspur Football Club at White Hart Lane. There are also a growing number of local events and festivals such as the Tottenham Carnival, which have been attended and enjoyed by residents of the borough, London and further afield, giving Haringey a more national profile. These events are managed by committees of local people in partnership with, College Arts, Bruce Castle Museum and Haringey Council.

The Lee Valley Park provides a range of cultural, leisure and recreational activities and opportunities for both residents and visitors, for example Tottenham Marshes serves as both a regional open space resource and a local open space for community events and festivals. The Waterside Centre at Stonebridge Lock on the River Lee provides opportunities for community recreation and water sports. Markfield Park and the Markfield Beam Engine and Museum are located in the Seven Sisters ward of the borough. The park is an underused resource and the listed Victorian pumping station has the potential to be developed into a significant visitor destination, with links to the River Lee offering leisure amenity links.

5.10 Employment

At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London. Low wages act as a barrier to home ownership and limit residents' housing options. 12.4% of Tottenham Hale's working age population is claiming Job Seekers Allowance. This is more than 2½ times the average rate for London (4.4%).

Unemployment levels - High and increasing unemployment is perhaps the greatest challenge facing the borough, and Tottenham has some of the highest levels of unemployment in London and the UK. In 2011, 63.7% of people aged 16-64 in Tottenham were in employment, below both the London and England rates of 68.2% and 70.4% respectively. Some 17,430 people in Tottenham were claiming an out of work benefit (May 2011), equivalent to 22.3% of the population aged 16-64. A 10th 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.

13% of those who are economically inactive are classified so because of long term sickness compared with 13.3% for all of Haringey and 16.2% for London (APS 2012)

49.5% of BME people in Tottenham are employed compared with 61% of white people. For Haringey, 52% of BME people are employed compared with 72% of white people. (Annual Population Survey [APS] 2012)

63.2% of females in Tottenham are economically active compared with 68.1% of males and 65.6% of females in Haringey. The female unemployment rate in Tottenham is 15.9% compared with 17.3% for males and 11.2% for females across Haringey. (APS 2012)

The JSA rate is 6.5% for females in Tottenham compared with 9.8% for males. The graph below shows the trend between 2004-2009

Youth unemployment is a particular issue, with the number of people aged 18-24 claiming Job Seekers Allowance (JSA) standing at

2,275 (November 2011); 61% of these young people live in Tottenham.

Intergenerational worklessness - where grandparents don't work and parents aren't working, the risk is that any children will not find or be equipped to find work. The Annual Population Survey shows us that in 2010, approximately 40% of households in Tottenham with one or more dependent children had no one in work, compared to 25% across Haringey and 21% across London.

Low skills base - over a third of the adult population in Tottenham have not achieved at least an NVQ level 1 qualification, and 18% have no qualifications.

Self-employment - the self-employment rate in Tottenham has halved in the last 6 years – from just under 14% to 7% - whilst the London rate has been steady at around 10%. The rate in Tottenham is the lowest current rate in the Upper Lea Valley area. Despite national policy stimulus around self-employment and entrepreneurship, current economic conditions are proving tough for start-ups.

Business resilience - During the 2011 riots Tottenham High Road was the scene of some of the worst civil disturbance in decades. The widespread looting and arson left the High Road scorched. Over 200 businesses were disrupted, and nine closed because their properties were destroyed. Consumer confidence was badly shaken and when local retailers were surveyed they felt that footfall was down by over 50% in the weeks following the disturbances, and a drop of upwards of 90% of trade in the night time economy.

Industrial areas - The London Plan designates two Haringey locations as Strategic Industrial Locations (SIL), the Central Leaside Business Area (part of which is in Haringey) and part of Tottenham Hale. Strategic Industrial Locations should be promoted, managed and, where appropriate, protected as London's main reservoirs of industrial and related capacity, including general and light industrial uses, logistics, waste management and environmental industries, utilities, wholesale markets and some transport functions.

The "From Around Here" study (2013) of industrial areas shows that Tottenham's industrial areas are increasingly fragmented, especially around Tottenham Hale/ Hale Village, which has seen change of use in the last decade. However there are still significantly large areas. Broadly, they constitute a northern area with Brantwood Road and Garnam Road estates, a middle area with Greater Ashley Rd and Millmead+Lockwood estates, and a southern area with South Tottenham and Rangemoor Road. The estimated number of units is 953 with a total estimated floor area of 330,556 m² and 7,564 jobs.

Overall, food and drink companies represent the largest number of businesses in the survey area, with 12% in Food and Drink Wholesale/Retail, and 6% in Food and Drink manufacture (total of 18% Food and Drink related). Other wholesale and distribution/retail was 14% of known units, and Other manufacture was 11% of the known units. The next highest was Car mechanics with 9% of businesses.

A review of the borough's existing employment land and buildings was undertaken in 2009. The Employment Study 2009 provided an assessment of the employment land and demand in the borough. The study recommended that all existing employment sites (designated or otherwise) be retained. Therefore, in the first instance, support will be given for all designated sites and smaller sites to remain in employment use. However, flexibility will be shown for alternative uses that complement the employment uses, contribute to social infrastructure or provide training.

The Employment Land Study Update 2012 shows a total vacant land supply of around 11 hectares, of which, nearly 60% is a single undeveloped site (DEA 6 - Friern Barnet Sewage Works). This represents a land vacancy rate of around 8% (or 3% when excluding DEA 6). The 2012 update also indicates that Haringey's B class employment is expected to increase by 6,934 jobs over the period 2011-2026, an increase of 15.6%. Employment growth will primarily

come from B1 and, to a lesser extent, B8 uses while B2 employment is forecast to continue to decline. Based on the above employment forecasts Haringey's floorspace and land requirements over the period 2011-2026 are forecast to increase by 125,529 m² of B use class floorspace (base scenario) or 21 ha. of land.

5.10 Retail and Town Centres

The hierarchy of shopping centres in the borough is defined as follows:

- **Metropolitan Centres:**
 - Wood Green
- **District Centres:**
 - Muswell Hill
 - Crouch End
 - Green Lanes
 - Tottenham High Road/Bruce Grove
 - West Green Road/Seven Sisters Road
- **Local Shopping Centres:**

Wood Green is identified as a Metropolitan Centre with a floorspace of 106,000 sq. m, with a modelled comparison goods floorspace need between 2001-2016 of 7,000 - 11,000 sq.m. The District Centres in the Borough have the following floorspace and modelled comparison goods floorspace (shown in brackets):

- Tottenham – 26,000 sq m (1,000 - 2,000 sq m)
- Muswell Hill – 29,000 sq m (1,000 – 2,000 sq m)
- Green Lanes – 36,000 sq m (<1,000 sq m)
- Crouch End – 32,000 sq m (1,000 sq m)
- West Green Road – 2,000 sq m

The Retail Study 2013 provides a borough-wide needs assessment for retail in the London Borough of Haringey. The study provides a guide to the shopping needs of the borough up to 2031. The retail capacity analysis in this report assumes that existing retail floorspace can, on average, increase its turnover to sales floorspace densities. The floorspace projections reflect these assumptions. In addition to

the growth in sales densities, vacant shops could help to accommodate future growth.

The Retail Study recognises that if the emerging plans for the Tottenham area come forward, the location of the existing centres within the east of the borough would not be able to fully serve the opportunity area and it may therefore be necessary to allow for additional retail development at Tottenham Hale.

Tottenham Hale Retail Park could be allocated as a District Centre in terms of the current scale of floorspace, however, there would need to be an intensification of uses on the Park to broaden the range and type of retailers and services. This would need to include smaller units for non-retail/community services.

5.11 Transport

Haringey's Local Implementation Plan (LIP) sets out how the Council intends to deliver more sustainable transport. Haringey has relatively good public transport, providing its residents access to employment opportunities in the City and West End, which are within easy travelling distance of rail and tube connections.

National Rail services run mostly North to South. Local services on the East Coast main line serving Alexandra Palace, Haringay and Hornsey have a peak 10 minute frequency while the Enfield Chase and Southbury Loop services provide a combined frequency of four trains per hour to stations in the borough. However, the frequency of local services on the West Anglia line serving Tottenham Hale and Northumberland Park are constrained by lack of capacity on the route. An improvement to these services is a major aspiration for the borough.

The Piccadilly Line serves Turnpike Lane, Wood Green and Bounds Green. The Northern Line serves Highgate while Tottenham Hale and Seven Sisters are on the Victoria Line. Statistics from London Underground show that substantial overcrowding occurs on Underground lines in the borough during the morning peak. This

occurs particularly at Seven Sisters on the Victoria Line and Turnpike Lane on the Piccadilly Line.

Forty bus routes serve the borough, of which all but seven are high frequency routes. The routes are mainly radial in nature. The main issue for these radial routes is provision of capacity to meet growing demand. A number of routes form a high frequency orbital network. However, further development of the orbital bus routes is needed to provide an effective and sustainable alternative to the car for journeys to the east and west of Haringey. In addition the development of the orbital bus network is constrained by the nature of the road network and low rail bridges.

Over half of Haringey households do not own a car or van (51.8%) an increase from 46.5% in 2001. This is much higher than London where 41.6% of households have no car. The number of cars belonging to Haringey households has also decreased from 62,929 in 2001 to 61,515 in 2011.

In Haringey, 34% of all trips are on foot. This compares with the London wide figure of 30%. Haringey residents make more than 184,000 walking trips per day, which is more than car driver trips (118,000). The Council is undertaking a programme of schemes to enhance the attractiveness of the walking environment and improving safety features, such as natural surveillance, lighting and removal of blind spots in certain routes and alleys.

Haringey has a network of cycle routes across the borough including cycle lanes on main roads, separated cycle lanes and special fully signed, quiet routes. The borough is part of the London Cycle Network and the London Cycle Guide provides a map of Haringey's on and off road cycle routes.

Environmental Characteristics

5.12 Flood Risk and Water Management

The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area. The quality of the water bodies and proposed actions for improvement up to 2027 are set out in the Thames River Basin Management Plan (2009) Annex B and Annex C respectively.

There are source protection zones, which protect two drinking water extraction sites in Haringey. These are the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.

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

The combination of climate change, predicted growth in population and increased water usage will exacerbate demand for water. Therefore, along with the increase in the intensity of rainfall, and more hard surfaces in our environment, there is a greater pressure on the drainage systems. Haringey requires that new developments should aim to decrease the demand for water as much as possible.

Increased flood risk due to anticipated changes in the climate also requires consideration of measures for adapting to climate change and minimising the flood risk in the area. Hard and soft landscaping associated with new development must take account of sustainable land management practices and managing the risk of flooding by applying Sustainable Urban Drainage Systems (SUDS) in order to improve water attenuation, quality and amenity.

The Stage 2 Strategic Flood Risk Assessment (SFRA) 2013 provides an update to the Stage 1 SFRA and assesses the flood risk of the potential site allocations. A range of mitigation measures is outlined in the SFRA, which predominantly focus on surface water management, the greatest risk of flooding identified for the borough. Such mitigation measures should be considered when planning development.

5.13 Soil and Land Quality

Haringey's industrial history has left a legacy of contamination. Haringey's Contaminated Land Strategy identified potentially contaminated sites in the borough. The Greater London Authority has identified 29 Previously Developed Land (PDL) sites in Haringey, which cover 84.9ha of land. The vast majority (86%) of PDLs is already allocated within the Unitary Development Plan or has planning permission and only 2% of sites are without planning permission. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL.

5.14 Air Quality

Under the National Air Quality Strategy, Haringey conducted a three-stage review and assessment of air quality in the borough. The review indicated that the Government's air quality standards for Particulate Matter 10 (PM₁₀) and Nitrogen Dioxide (NO₂) would not be met. As a result, the Council declared the whole borough as an Air Quality Management Area (AQMA) on 1 July 2001 for PM₁₀ and NO₂.

The two London Air Quality Network (LAQN) monitoring sites in Haringey are located at Haringey Town Hall and Priory Park. The 2010 Air Quality Strategy Objectives show that at both sites, NO₂ (Annual Mean) Objective was not achieved with readings of 50 ug/m³ and 41 ug/m³ respectively; however the PM₁₀ (Annual Mean) Objective was achieved at both sites.

Major roads provide a significant proportion of PM₁₀ concentrations in Haringey. There are no sites within the borough, which are listed as producing emissions to air under the Environment Agency's Pollution Inventory although the Edmonton Solid Waste Incinerator is located just beyond the northeast boundary of the borough.

5.15 Noise

The Council supports the Mayor of London's noise strategy 'Sunder City – The Mayor's Ambient Noise Strategy', March 2004. The strategy focuses on reducing noise through better management of transport systems, better town planning and the design of buildings, including minimising the noise on roads and railways and the careful siting of noisy activities. The strategy seeks to protect housing, schools, waterways and open spaces as areas, which should be peaceful havens.

The Council seeks to address this issue by controlling pollution and nuisance from new development, as well as nuisance from existing uses and from road traffic, by safeguarding the amenities of neighbourhood and quality of life for local people. The Council also encourages the reduction of the adverse effects of traffic by encouraging more sustainable forms of transport such as walking, cycling and public transport through the Haringey Walking Plan and Cycling Action Plan and the Haringey Cycle Route Network, where minimal noise is created from both these activities.

5.16 Climatic Factors

In 2009, Haringey Council adopted a target of reducing CO₂ emissions by 40% by 2020 on the 2005 baseline. The Council is committed to developing an annual action plan to meet this target, fulfilling a commitment to establish a long term CO₂ reduction target made in the Greenest Borough Strategy. The Annual Carbon Report 2012 sets out the carbon targets and CO₂ reduction activity and projects for the borough.

The population of Haringey is expected to increase during the plan period to 2050. This will result in the construction of new buildings and greater demand for transport. If this growth is allowed to happen at current rates, emissions are expected to increase by a further 195 kpa.

The Council is working to develop a de-centralised energy feasibility study for selected sites to identify financial and operational matters to assist with future implementation of such networks. The London Heat map is a map-based data tool to assist developers and local authorities in identifying and implementing de-centralised energy. Over time, Haringey and its partners will populate the London Heat Map with Haringey specific information on heat load and demand, and identify opportunities for new developments or major retrofitting projects to connect to or future proof buildings and sites to connect to future de-centralised networks. In areas where future network opportunities are identified, development proposals should be designed to connect to these networks or assessed whether there are opportunities to extend their de-centralised energy system beyond the site boundary to adjacent sites.

In line with the London Plan energy hierarchy, the Council will expect developments to achieve a reduction in predicted carbon dioxide emissions of minimum 20% through the use of on-site renewable energy generation unless it can be demonstrated that such provision is not feasible. The majority of the sites investigated in the Climate Change, Site Development and Infrastructure Study 2009 are found to support the utilisation of renewable energy technologies to achieve a 20% reduction in predicted CO₂ emissions.

5.17 Open Space and Biodiversity

Within Haringey an area of the Lee Valley Regional Park, which straddles the eastern boundary of the borough, is strategically designated as Green Belt. Green Belt has a structural role to play and therefore is the strongest level of protection, it is of national and regional importance and its aim is to prevent urban sprawl by keeping land permanently open. Green Belt is protected in line with national planning policy. The park provides a range of sporting, nature conservation and recreational activities for both residents of the borough and visitors alike. The Council will protect existing Green Belt land and strongly resist any inappropriate development there. The regional park also has an area within it designated as a Ramsar Site, which is protected by European Law, and is classified as a Site of Special Scientific Interest.

Metropolitan Open Land (MOL) is defined as open land within the built-up area, which has wider than borough significance. It receives the same presumption against development as Green Belt land. There are 17 areas designated as MOL in Haringey, for example Alexandra Park.

Haringey has 382.9 hectares of open land, the largest areas being:

- Fortis Green reservoir and playing field
- St Alloysius/Channing playing fields
- Chestnuts recreation ground
- Down Lane recreation ground
- Priory Park.

Finsbury Park and Alexandra Park are identified by English Heritage in their *Register of Parks and Gardens of Special Historic Interest in England*. A further 34 of Haringey's public parks, gardens, squares, cemeteries and churchyards are of local historic interest and are registered in *The London Parks and Garden Trust Inventory*.

Haringey 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 three Local Nature Reserves (LNRs), with wildlife or geological features that are of interest locally. The waterways also offer a valuable habitat, which it is recognised should be preserved and enhanced. Details of the ecological status of the waterways are given in the Thames river Basin Management Plan, 2009.

The areas designated as Sites of Metropolitan Importance are located in Highgate, Muswell Hill, Crouch End, Stroud Green and Harringay in the western part of the borough and adjacent to the Lee Valley in the eastern end of the borough. The proportion of Local Sites where positive nature conservation management has been or is being implemented has increased from 27% in 2010/11 to 32% in 2011/12.

There are also 42 hectares of managed allotments in the borough providing a total of 1650 individual plots. This equates to 0.18 hectares of allotment space and 7.9 plots per 1,000 residents.

The Open Space and Sports Assessment 2004 found that Haringey has overall provision of 1.7ha of open space per 1,000 population and that areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. This study was updated by Haringey's Open Space and Recreational Standards Supplementary Planning Document 2008, which set out detailed advice and implementation guidance to developers to address open space deficiency. A further update of the Open Space and Biodiversity is scheduled for 2014, which will be used to inform the development of the AAPs. The Council will seek to create new open space, where the opportunity arises as well as seek to improve the quality, usage and accessibility of existing public open space.

Given the proximity of the Tottenham Hale growth area to the Lee Valley Regional Park and other local parks, the area is considered to have good access to public open space. However, the access to the Park and other spaces needs to be improved. There is also a pocket of Tottenham Green Ward, which suffers from poor access. In addition, other measures such as tree planting, improving access to allotments and the creation of green routes, will help to improve the

green infrastructure.

The Council has recently secured £14.7m investment in the facilities at Tottenham Green, Park Road and the Broadwater Community Centre. The Council is also seeking to lease the outdoor facilities at White Hart Lane Community Sports Centre and Finsbury Park Track & Gym.

5.18 Cultural Heritage and Townscape

Haringey has a rich architectural heritage including the following:

- 467 Statutory Listed Buildings of Special Architectural or Historic Interest
- 6 Grade I Buildings and 434 Grade II Listed Buildings
- 1150 Locally Listed Buildings of Merit
- 29 Conservation Areas
- 2 English Heritage statutory registered Parks and Gardens of Special Historic Interest
- 34 Local Historic Green Spaces
- 23 Designated Sites of Industrial Heritage Interest
- 22 Archaeological Priority Areas.

Appendix A3 shows the locations of Conservation Areas in the Borough. The following areas have had Conservation Character Area Appraisals undertaken: Bruce Castle; St Ann's; Clyde Circus; Muswell Hill; Wood Green; Trinity Gardens; Crouch End; and Highgate. In 2012 the English Heritage Register of Heritage Assets identified 13 buildings and historic structures and 5 conservation areas at risk. It is hoped to remove between 2 and 4 entries in 2013.

In Haringey the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Landmark Viewing Corridor: London Panorama 1. Proposed developments within London Panoramas should fit within the prevailing pattern of buildings and spaces and should not detract from the panorama as a whole. Haringey has sought to take account of this strategic view and promotes its protection against the impact of development proposals, which fall within the boundaries of the following zones:

- The viewing corridor (the direct view from Alexandra Palace to St. Paul Cathedral)
- The wider setting (the area immediately surrounding the viewing corridor affecting its setting)
- The mid-ground the high ridge area where any , higher may be visible from the viewpoint)
- The foreground (the open landscape with sloping park).

In addition to the strategic view, there are also many local views within the borough, which should be taken into consideration. The Council will resist proposals that it considers will cause harm to these views.

5.19 Waste and Recycling

All households and schools in the borough now have access to convenient and comprehensive recycling facilities, with facilities at a number of community centres and on-street recycling points on high streets and around transport hubs. There are two Reuse & Recycling Centres in the borough for residents to bring unwanted items to, and these accept an increasing range of materials and items for reuse or recycling.

North London's waste is expected to rise from approximately 1.5 million tonnes in 2010 to over 2.3 million tonnes by 2020. Whilst the Council will continue to develop its waste reduction and recycling policies to minimise the environmental impact of municipal waste under its control, it will be necessary for North London to develop new solutions and facilities for managing waste sustainably, and as far as possible, within the boundaries of the sub-region.

In this context, the seven North London boroughs that constitute the North London Waste Authority are developing the North London Waste Plan Development Plan Document (DPD), a planning framework with the aim of identifying suitable and viable sites to meet the sub-region's future waste management needs and satisfy the apportionment targets of the London Plan. The plan is part of each borough's Local Development Framework.

The DPD has to identify sufficient sites to cover 85% of the waste produced in the north London area and to meet the London Plan apportionment of 2,384,334 tonnes (equivalent to 28.4 hectares).

Haringey residents generate approximately 366kg of waste per person. Overall, residents produced 85,000 tonnes of waste each year. Around 75,000 homes currently receive a green box recycling service, enabling them to recycle a wide range of goods. In 2006-2007, 22% of waste was recycled. In 2007/2008, Haringey exceeded their recycling and composting target with 25.68% of all waste sent to recycling and composting. The remaining residential and commercial waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which generates electricity.

Veolia was awarded the waste contract for the borough in 2011 and has committed to the following key outcomes for Haringey:

- Top 25 percent performance in London on street cleansing
- 40 percent recycling rate by 2015, with a view to reaching 50 percent
- Reduction in carbon emissions of 40 percent from current levels.

In 2011/12, the recycling rate was approximately 27%. There was an increase in the recycling rate for the first quarter of 2012/13, which is largely attributable to the continuing roll-out of fortnightly waste collection services in parts of the borough. A third phase of the roll-out is set to follow, after which the Council is expected to exceed the 2013 recycling target of 31.7%.

5.20 Infrastructure

The Infrastructure that will be needed to support the future growth in the borough has been assessed in the Community Infrastructure Study 2010 and is set out in the Infrastructure Delivery Plan (IDP) and Update 2013. The IDP also identifies the funding required and identifies gaps in the funding stream that the Community Infrastructure Levy could contribute towards.

6 Sustainability Issues and Objectives

6.1 Sustainability issues and objectives

A number of physical, social and environmental issues and challenges need to be addressed if regeneration is to be successful in Tottenham, which include:

- The dominance of single tenure housing in one area, which can be detrimental to the creation of a mixed and balanced community
- The under performance of the High Road with regard to commercial and retail activity
- Barriers to movement in all directions with particular reference to east west travel through the severance produced by the railways' linear routes, which has meant that the physical structure of Tottenham has lost contact with the open space of the Lee Valley
- Public image defined in part by part poor quality streetscape and the run down appearance of buildings
- Poor transport infrastructure in North Tottenham
- The lack of strong sense of place in the areas of Northumberland Park, High Road West, Bruce Grove, Tottenham Hale and Seven Sisters
- The challenge posed by the opportunity to create a district centre in Tottenham Hale
- The need to improve the quality and quantum of social infrastructure

Consultation exercises in the area have also identified the following key issues for the Tottenham Area. Other issues may be identified during the preparation of the AAPs and the subsequent SA process:

- Better open spaces
- A safer place to live
- High quality local housing
- More local job opportunities
- Better education
- Improved health and well-being
- More leisure and community facilities
- A thriving high road
- A celebration of arts, culture and diversity.

The Draft Strategic Regeneration Framework 2013 sets out six transformative strategies to achieve the future vision of Tottenham, which include:

- 1 Support a Strong Community
- 2 Bring Transformative New Change and Development
- 3 Create New Jobs and Employment Opportunities
- 4 Create a Fully Connected Community
- 5 Build New Housing to Increase Choice and Improve the Quality of Existing Housing
- 6 Create Great Places and Destinations.

The key social, economic and environmental issues that relate to the Area Action Plans include:

Social

Demographic profile

- There is a high proportion of under 20s in Tottenham increasing the need for services aimed at mothers, children and young people.
- Nearly half the population comes from ethnic minority backgrounds

Housing

As an identified growth area it is anticipated that Tottenham will deliver the majority of the housing in the borough with a capacity to deliver up to 10,000 housing units. The Council is also proposing a programme of Housing Investment and Estate Renewal, which aims to protect and enhance existing Council housing whilst maximising the opportunities for new homes and in particular new affordable homes.

- There is an overwhelming need for affordable housing.
- The dominance of social housing needs to be addressed and a better balance of quality, tenure mix and physical integration provided
- Home ownership rate in Tottenham are significantly lower than the London average.
- There are high rates of Houses in Multiple Occupation (HMOs) and the illegal residential occupancy of industrial and warehouse sites is increasing
- Several of Tottenham's housing estates require investment or renewal to address poor quality housing conditions, lack of connectivity and unsafe layouts
- There are currently just under 3,000 homeless households (including 1,884 families with children) living in temporary accommodation. Half of these households are living in Tottenham.
- Complaints about the standard of private rented accommodation are concentrated on properties that are situated in the east of the borough, with particularly high numbers in Bruce Grove and north of the High Road in Northumberland Park.

- Increased demand for low cost private rented accommodation has also resulted from a sharp rise in the number of migrant workers coming to Haringey.
- Future housing growth is likely to place pressure on other land uses, open spaces and local services and, if not carefully integrated, may affect the character of the area.

Education

- Additional primary school provision is anticipated in Tottenham Hale
- Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.
- Tottenham lacks a large national or international-scale educational, institutional and high quality employment anchors

Health

- The most deprived areas experience the poorest health with male life expectancy in Tottenham low compared to Haringey average
- Appropriate service provision is required for all groups of the community in terms of education, housing and health.

Employment

- Tottenham has some of the highest levels of unemployment in London and the UK.
- Too few of Tottenham's young people are engaged in further education, employment or training
- Worklessness, isolation and low income have adverse effects upon residents health and well-being.
- Employment growth is below the London average

Deprivation and Crime

- Northumberland Park is the most deprived ward in Haringey
- Of the top 10 most deprived wards, 8 of them are in Tottenham.
- Approximately 48% of the children in Tottenham are living in poverty
- Average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London.
- 55 priority areas have been identified, which are considered vulnerable locations for crime, with Northumberland Park containing 12 and Tottenham Hale 7.
- Crime is high in Tottenham compared to Haringey with many residents concerned about safety, gang activity and high crime rates

Transport

- Stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas.

Economic

Employment

- Youth unemployment is a particular issue, with the number of people aged 18-24 claiming Job Seekers Allowance standing at 2,275; 61% of these young people live in Tottenham.
- Along the Lee Valley, older industrial and manufacturing sites are occupied but operating at low employment density
- Little office related commercial development exists catering to higher density, higher paying jobs

Economic Growth

- Inward investment should be encouraged, with a focus on growth sectors and existing key business clusters
- The regeneration of Haringey Heartlands, Tottenham Hale and the industrial areas in Central Leaside offer new business and employment opportunities
- Attracting new uses is complicated by the poor image presented by adjacent industrial uses.
- Businesses are concerned with the continuous speculation about the future of the sites where their businesses are located.
- Major mixed-use development in the surrounding area and other ‘rumours’ undermine the will for businesses to invest in an area (whether financially or otherwise) or commit to the area, which breaks down confidence.
- Start-up businesses should be encouraged and supported
- Existing employment areas including town centres should be retained and enhanced.

Skills and training

- Over a third of the adult population in Tottenham has not achieved at least an NVQ level 1 qualification, and 18% have no qualifications.
- Opportunities need to be found to raise educational attainment and develop skills to reduce levels of worklessness and associated deprivation.
- Training and skills development should be promoted in the eastern parts of the borough to reduce levels of worklessness and associated deprivation.

Retail Provision

- The 2011 riots left the High Road scorched and consumer confidence badly shaken
- The High Road needs to be maintained and enhanced to retain retail capacity within the area

Transport

- High levels of accessibility and public transport provision to the centres need to be maintained
- Underground and Overground transport access is unequal across Tottenham with access in north Tottenham particularly poor and much of the regional connectivity potential remains unrealised.
- Several of the potential Lee Valley development sites have poor transport access
- There is generally poor east-west connectivity across Tottenham and with the rest of Haringey
- Existing cycling infrastructure is poor
- Transport links need to be improved to major employment opportunity areas outside of the borough including Stratford, Brent Cross and Stansted Airport.
- Tottenham fails to link its unique offerings into a cohesive network of destinations

Environmental

Biodiversity

- All biodiversity sites and species should be protected and, where possible enhanced.
- Biodiversity sites should function as multifunctional green space, which are designed to a high standard to accommodate nature, wildlife, health, recreation, historic and cultural assets
- The biodiversity value of waste land and derelict sites should be recognised.
- Opportunities to enhance green corridors/chains within the borough should be identified.

Open Space

- Accessibility to and quality of open spaces needs to be improved, including opportunities for accessible open spaces within new development.
- Smaller open spaces and green areas around highways and junctions provide opportunities for improvements, including tree

planting.

- Waterways should contribute towards the provision of green corridors within the borough by creating buffer zones.
- Strategic landscape and open space resources should be maintained, enhanced and, where possible, linked
- The All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors

Historic Environment

- Haringey has a total of 467 Listed Buildings of which 6 are Grade 1 and of outstanding national significance. There are 29 Conservation Areas and 22 Areas of Archaeological Importance. All cultural heritage features should be conserved.

Built Environment

- The quality in the design of the built environment should be improved
- Consideration should be given to the height, density and location of development
- The microclimate should be considered when planning new development in terms of sun, wind, shading, urban heat island effect etc.

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
- Brownfield sites should be prioritised and sites which offer the greatest capacity for development
- Sites, which may be better used as a green resource should be identified.

Air and Noise Quality

- Measures to improve air and noise quality in development should be considered

Flood Risk and Water

- Tottenham Hale is the worst affected ward in the borough with more than 50% lying within Flood Zone 2 (low to medium risk of flooding).
- Northumberland Park to the north of Tottenham Hale is also largely within Flood Zone 2.
- Small areas within Northumberland Park, Tottenham Hale and Seven Sisters lie within Flood Zone 3, which is land with a high risk of flooding. Development should be avoided in areas of flood risk.
- Flood risk should be reduced by creating space for water and reducing surface water rates to greenfield runoff rates where viable.
- Development should be encouraged which includes Sustainable Drainage Systems (SuDS) and incorporates facilities to reduce water consumption and re-use grey water.

Energy and Carbon

- Further reductions in CO₂ emissions should be encouraged, particularly in the built environment.
- Energy efficiency measures, including community heating schemes, Combined Heat and Power and energy action zones and the linking of homes to decentralised local energy networks should be promoted.
- Broad areas for development of specific renewable energy technologies should be identified.

Waste and Recycling

- Waste production should be further reduced and sustainable sourcing and waste management principles promoted for all new developments in the borough.

Sustainable Transport

- Businesses/services should be encouraged to produce travel plans and require them as part of planning applications for new development with significant transport implications.
- Dependency on the private car should be reduced and public transport use increased.
- Key transport interchanges should be improved to accommodate proposed housing developments and regeneration programmes.
- Cycle and pedestrian routes and facilities should be promoted and improved.

6.2 Sustainability Objectives

A set of 20 Sustainability Objectives was developed in the SA of the Local Plan: Strategic Policies, which will also be used in the SA of the AAPs. Additional sub-objectives and sustainability indicators will be added where appropriate. The Sustainability Objectives are as follows:

- | | | | |
|-------------|--|-------------|---|
| SO1 | To reduce crime, disorder and fear of crime | | |
| SO2 | To improve levels of educational attainment for all age groups and all sectors of society | SO11 | To protect and enhance biodiversity |
| SO3 | To improve physical and mental health for all and reduce health inequalities | SO12 | To protect and enhance the borough's townscape and cultural heritage resources |
| SO4 | To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents | SO13 | To protect and enhance the borough's landscape resources |
| SO5 | To protect and enhance community spirit and cohesion | SO14 | To protect and enhance the quality of water features and resources |
| SO6 | To improve access to services and amenities for all groups | SO15 | To encourage the use of previously developed land |
| SO7 | To encourage sustainable economic growth and business development across the borough | SO16 | To mitigate and adapt to climate change |
| SO8 | To develop the skills and training needed to establish and maintain a healthy labour pool | SO17 | To protect and improve air quality |
| SO9 | To encourage economic inclusion | SO18 | To limit climate change by reducing CO₂ emissions |
| SO10 | To improve the vitality and vibrancy of town centres | SO19 | To ensure the sustainable use of natural resources |
| | | SO20 | To promote the use of sustainable modes of transport |

Question 3: Sustainability Issues and Objectives

Do any of the sustainability issues and objectives in **Section 6** need to be added to or amended? If so please state why.

7 Sustainability Appraisal Framework

7.1 The SA Framework

The SA framework that was developed for the SA of the Local Plan: Strategic Policies and the draft Development Management Document has been used as the starting point for this assessment and amendments made where considered necessary

Sustainability Objectives		Indicators
1 CRIME		
SO1 To reduce crime, disorder and fear of crime	<ul style="list-style-type: none"> - To encourage safety by design - To reduce levels of crime - To reduce the fear of crime - To reduce levels of anti-social behaviour - To develop vacant/derelict sites 	1.1 Total no. notable offences (p/a) 1.2 Annual incident rate per 1,000 residents 1.3 Indices of multiple deprivation: crime and disorder figures 1.4 No. of applications including 'Secured by Design'
2 EDUCATION		
SO2 To improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> - To increase levels of participation and attainment in education for all members of society - To improve the provision of and access to education and training facilities - To ensure educational facilities are accessible to residential areas 	2.1 Indices of multiple deprivation: Education figures 2.2 % of population with no qualifications 2.3 % of populations with HE educational attainment 2.4 Proportion of resident pupils achieving 5+ GCSE grades A-Cs including English and Maths, split by equality group 2.5 No./type and capacity of educational establishments 2.6 Level of access to education

Sustainability Objectives		Indicators
3 HEALTH		
SO3 To improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> – To improve access to health and social care services – To prolong life expectancy and improve well-being – To promote a network of quality, accessible open spaces – To promote healthy lifestyles – To provide good quality outdoor sports facilities and sites 	3.1 Perceptions of health 3.2 %age of population with long-term limiting illness 3.3 Indices of multiple deprivation: Health deprivation and disability 3.4 Mortality rates 3.5 No./type and capacity of health facilities
4 HOUSING		
SO4 To provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> – To reduce homelessness – To increase the availability of affordable housing – To improve the condition of Local Authority housing stock – To improve the diversity of the housing stock – To promote the efficient re-use of existing housing stock whilst minimising the impact on residential amenity and character – To create balanced communities of different affordable housing types, densities and tenures – To create integrated, mixed-use tenure developments 	4.1 Number of homes in the borough by type and tenure 4.2 No. of people in housing need 4.3 Number of households living in temporary accommodation 4.4 Number of non-decent or 'unfit' homes in the borough 4.5 No. of households living in overcrowded properties 4.6 Income to average house price ratio 4.7 No. /type of new dwellings built in the borough per/annum 4.8 No. of new dwellings that are that are: <ul style="list-style-type: none"> - Code for Sustainable Homes level 4 - Life Time Homes - Wheelchair accessible

Sustainability Objectives		Indicators
5 COMMUNITY COHESION		
SO5 To protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> - To promote a sense of cultural identity, belonging and well-being - To develop opportunities for community involvement - To support strong relationships between people from different backgrounds and communities 	5.1 Percentage of population in ethnic groups 5.2 Number of transient population
6 ACCESSIBILITY		
SO6 To improve access to services and amenities for all groups	<ul style="list-style-type: none"> - To improve access to cultural and leisure facilities - To maintain and improve access to essential services (banking, health, education) facilities 	6.1 Percentage of 'no car' households 6.2 Percentage of 'no car' households within access to: health centres/GPs surgeries, hospitals, food stores, culture and leisure facilities 6.3 Public transport accessibility 6.4 No./type and capacity of community facilities per ward
7 ECONOMIC GROWTH		
SO7 To encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> - To retain existing local employment and create local employment opportunities - To diversify employment opportunities - To meet the needs of different sectors of the economy - To facilitate new land and business development 	7.1 No. of VAT registrations 7.2 No. of VAT de-registrations 7.3 Number and % of jobs by sector 7.4 % employment growth rates per sector 7.5 Percentage of working age self-employed

Sustainability Objectives		Indicators
8 SKILLS AND TRAINING		
SO8 To develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> - To improve lifelong learning opportunities and work related training - To reduce high levels of unemployment and worklessness - To facilitate development of new and improved training facilities in high unemployment areas 	8.1 Indices of multiple deprivation: employment and income deprivation 8.2 Numbers of unemployed by sector 8.3 Numbers receiving benefit 8.4 Percentage of population with no qualifications
9 ECONOMIC INCLUSION		
SO9 To encourage economic inclusion	<ul style="list-style-type: none"> - To improve physical accessibility to local and London-wide jobs - To support flexible working patterns - To encourage new businesses 	9.1 Access to employment 9.2 No. of vacant business premises available
10 TOWN CENTRES		
SO10 To improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> - To enhance the environmental quality of the borough's town centres - To promote the borough's town centres as a place to live, work and visit - To ensure that the borough's town centres are easily accessible and meet local needs and requirements - To promote high quality buildings and public realm 	10.1 Percentage of vacant town centre floor space 10.2 Peak zone A rental data £/m ² annum 10.3 Quality of Town Centre streetscape and general shopping environment 10.4 Percentage retail yields in town centres

Sustainability Objectives		Indicators
11 BIODIVERSITY		
SO11 To protect and enhance biodiversity	<ul style="list-style-type: none"> – To protect and enhance Priority Species and Habitats identified in the Biodiversity Action Plan – To link and enhance habitats and wildlife corridors – To provide opportunities for people to access wildlife and diverse open green spaces 	11.1 Change in priority habitats (ha) and species (no.) 11.2 No. of green roofs/facades
12 TOWNSCAPE & CULTURAL HERITAGE		
SO12 To protect and enhance the borough's townscape and cultural heritage resources	<ul style="list-style-type: none"> – To promote townscape character and quality – To conserve and enhance the significance of the heritage assets, including buildings and areas of architectural and historic interest 	12.1 No. of listed buildings and number of heritage assets on the English heritage at risk register 12.2 Extent of borough covered by Conservation Areas, Areas of Archaeological Importance and Historic Parks 12.3 No. of Conservation Areas with up-to-date management plans 12.4 No. of Building for Life Assessments?
13 OPEN SPACE		
SO13 To protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> – To promote a network of quality, accessible open spaces 	13.1 No. of new spaces created 13.2 Areas of open space deficiency 13.3 Changes in the amount quantity of open space (ha) 13.4 Changes in SINCS and LNRs 13.5 Deficiency in access to nature
14 WATER RESOURCES		
SO14 To protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> – To preserve ground and surface water quality – To conserve water resources – To ensure type and capacity of infrastructure is known for future development 	14.1 Water quality changes 14.2 Average potable water consumption l/head/day (domestic and commercial) 14.3 Capacity and condition of water and sewerage infrastructure

Sustainability Objectives		Indicators
15 SOIL AND LAND QUALITY		
SO15 To encourage the use of previously developed land	<ul style="list-style-type: none"> – To encourage the development and remediation of brownfield land – To promote the efficient and effective use of land whilst minimising environmental impacts 	15.1 Number of planning applications on previously developed land 15.2 No. of contaminated sites 15.3 No. of contaminated sites remediated
16 FLOOD RISK AND CLIMATE CHANGE		
SO16 To mitigate and adapt to climate change	<ul style="list-style-type: none"> – To reduce and manage flood risk – To encourage sustainable design solutions – To encourage the inclusion of SUDS in new development 	16.1 No. of properties in flood risk zones 16.2 No. of flooding incidents (including sewer flooding) 16.3 No. of planning applications incorporating SUDS 16.4 No. of planning applications meeting Code 4/ BREEAM Excellent or above
17 AIR QUALITY		
SO17 To protect and improve air quality	<ul style="list-style-type: none"> – To manage air quality within the borough – To encourage businesses to produce travel plans 	17.1 No. of days p/a of high pollution 17.2 Annual average concentrations and exceedances of PM ₁₀ and NO ₂ 17.3 Number of businesses with travel plans
18 NOISE		
SO18 To minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> – To minimise the impact of the ambient noise environment 	18.1 No. of Priority areas in the borough 18.2 Number of reported incidents of noise levels above 55dB (A) Lden

Sustainability Objectives		Indicators
19 ENERGY & CARBON		
SO19 To limit climate change by minimising energy use reducing CO₂ emissions	<ul style="list-style-type: none"> – To minimise the use of energy – To increase energy efficiency and support affordable warmth initiatives – To increase the use of renewable energy – To mitigate against the urban heat island effect – To ensure type and capacity of infrastructure is known for future development 	19.1 CO ₂ emissions and energy consumption (breakdown by type/source) 19.2 No. of energy efficiency initiatives approved p/a 19.3 % Renewable energy included in development by sector 19.4 No. of developments p/a connected to decentralised energy networks 19.5 No. of applications p/a designed to mitigate against urban heat island
20 WASTE MANAGEMENT		
SO20 To ensure the sustainable use of natural resources	<ul style="list-style-type: none"> – To reduce the consumption of raw materials (particularly those from finite or unsustainable sources) – To encourage the re-use of goods – To reduce the production of waste – To support the use of sustainable materials and construction methods – To increase the proportion of waste recycling and composting across all sectors 	20.1 Amount of municipal waste sent to land fill (tonnes) 20.2 Percentage of municipal waste sent for reuse, recycling and composting (by sector)
21 SUSTAINABLE TRANSPORT		
SO21 To promote the use of sustainable modes of transport	<ul style="list-style-type: none"> – To improve the amenity and connectivity of walking and cycling routes – To promote the use of public transport – To reduce the use of the private car – To encourage development in growth areas and town centres and reduce commuting 	21.1 No. of Households who own private vehicles 21.2 Public transport accessibility levels (by ward) 21.3 Types of personal travel by mode (p/a) 21.4 Proximity of residents to cycling routes

7.2 Comparison of SA objectives

The Sustainability Appraisal guidance suggests that a compatibility assessment is carried to check that the Sustainability Objectives are compatible with one another. The Compatibility Assessment is set out below:

SO1	Crime	1																		
SO2	Education		2																	
SO3	Health			3																
SO4	Housing				4															
SO5	Community Cohesion					5														
SO6	Accessibility						6													
SO7	Economic Growth							7												
SO8	Skills & Training								8											
SO9	Economic Inclusion									9										
SO10	Town Centres										10									
SO11	Biodiversity				?			?				11								
SO12	Townscape & Cultural Heritage							?					12							
SO13	Open Space				?			?						13						
SO14	Water Resources				?			?							14					
SO15	Soil & Land Quality										?					15				
SO16	Flood Risk & Climate Change																16			
SO17	Air Quality							?											17	
SO18	Noise							?												18
SO19	Energy & Carbon				?			?												
SO20	Waste Management							?												
SO21	Sustainable Transport																			20

7.3 Results of Compatibility Matrix

The following Sustainability Objectives raise areas of uncertainty regarding their compatibility with each other:

- **SO4 Housing and SO11 Biodiversity, SO13 Open Space, SO14 Water Resources, SO 19 Energy & Carbon**
The provision of additional housing to provide for the growth in population could cause conflict with the need to protect and enhance biodiversity, open space and water resources in the borough. Care will need to be taken to ensure suitable mitigation measures are applied. Additional housing is likely to have an adverse impact upon energy consumption and carbon emissions. Again care will be needed to incorporate suitable mitigation measures to minimise any adverse impacts.
- **SO7 Economic Growth and SO11 Biodiversity, SO12 Townscape & Heritage, SO13 Open Space, SO14 Water Resources, SO17 Air Quality, SO18 Noise, SO19 Energy & Carbon, SO20 Waste Management**
Whilst the need for economic growth is recognised as an essential part of sustainable development, care will be needed to ensure that the economic benefits do not cause unnecessary adverse environmental impacts. Significant adverse impacts should be avoided wherever possible and alternative options considered, which will reduce or eliminate such impacts should be pursued. Where it is not possible to eliminate such impacts, suitable mitigation measures will need to be identified.
- **SO11 Biodiversity and SO15 Soil and Land Quality**
There is a potential conflict between the desire to protect areas of biodiversity within the borough and the development of previously developed land. Significant adverse impacts should be avoided wherever possible and alternative options considered, which will reduce or eliminate such impacts should be pursued. Where it is not possible to eliminate such impacts, suitable mitigation measures will need to be identified.

Question 4: Sustainability Appraisal Framework

Are the objectives and indicators set out in the SA Framework in Section 7 appropriate?

8 Sustainability Report Structure

8.1 Structure of the Sustainability Report

The proposed structure of the Sustainability Report is as follows:

- **Non-technical Summary**
A summary in plain language that summarises the SA process, the likely significant effects of the plan and the difference the SA has made to the development of the plan.
- **Introduction**
 - Explanation of the purpose of the SA
 - The SA process
 - Compliance with the SEA Directive and Planning Regulations
 - Why is the DPD needed
- **Methodology**
 - When the SA was carried out
 - Who carried out the appraisal
 - The consultation process
 - Any difficulties in undertaking the SA
- **Plan Issues and Objectives**
 - The purpose of the AAPs being assessed
 - The AAPs Objectives
- **Context and Baseline**
 - Links to other policies, plans and programmes
 - A summary of the baseline information
- **SA Issues and Objectives**
 - Sustainability Issues (social, economic and environmental)
 - Sustainability Objectives
 - Any limitations or amendments to this information
- **The Sustainability Appraisal Framework**
 - Purpose of the framework
 - The SA framework – objectives, indicators and targets
- **Plan Issues and Options**
 - What options have been considered and how they were identified
 - Comparison of sustainability objectives against the plan objectives
 - Comparison of the significant sustainability effects of options/alternatives
 - Reasons for the selection and rejection of options
 - Any proposed mitigation measures
- **Effects of the AAP policies**
 - How sustainability has been considered in developing the AAPs
 - Summary of the significant positive sustainability effects of the AAPs
 - Summary of the significant negative effects of the AAPs
 - Proposed mitigation measures
 - Any uncertainties and risks
 - Feedback from the consultation and impacts on the AAPs development
- **Implementation**
 - Next steps in the plan preparation
 - How the plan will be implemented
 - Links to other tiers of plans and programmes
 - Proposals for monitoring.

8.2 Method of assessment

The AAPs will be assessed against the SA framework to establish the likely significant effects, both positive and negative, of the policies. The SA framework sets out the Sustainability Objectives, Indicators and Targets that will be used to assess the likely impacts of the AAPs, which has been developed in consultation with the Statutory consultees and other key local stakeholders.

The SA will be used to predict the likely significant effects of the AAPs, including alternatives and then evaluate the effects of the plan. The assessment will be carried out in the form of a matrix and will include the identification of potential mitigation measures.

The results will be scored as follows:

Major Positive	++
Minor Positive	+
Uncertain	?
Minor Negative	-
Major Negative	--
No Significant Impact	

A commentary will accompany the matrix to explain the reasons for the scoring against the SA Framework. The results will be assessed in terms of short, medium and long-term effects (5, 10 and 15 years) including permanent and temporary, direct and indirect effects.

The SEA Directive also requires an assessment of secondary, cumulative and synergistic effects. Collectively these effects are called cumulative impacts. Cumulative impacts may arise, for example, where several developments each have insignificant effects but together have a significant effect or where several individual effects have a combined effect.

Synergistic effects interact to produce a total effect greater than the sum of the individual effects. Significant synergistic effects often occur as habitats, resources or human communities get close to capacity. For example, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.

The assessment of alternative options will include a clear audit trail of the details for selection and rejection in order to document a transparent approach. Any difficulties or lack of information in undertaking the SA will be clearly documented.

8.3 Compliance with the SEA Directive

The SA will clearly signpost how the appraisal complies with the SEA Directive. The requirements of the SEA Directive are set out in [Appendix A4](#)

8.4 What are the next steps?

The next stage of the development of the AAPs will be the generation of options, which will draw upon the baseline information identified during the scoping stage. The options will be assessed against the SA framework as set out in [Section 7](#). The most sustainable approach will form the basis of the AAPs and the policies will be assessed in detail through the sustainability appraisal process.

Question 5: Sustainability Report and Methodology

Is the proposed structure of the Sustainability Report and methodology in [Section 8](#) suitable? Is the methodology clear and complete?

3. Northumberland Park AAP Map

Key Issues and Challenges Map

Please note the areas are indicative only and do not represent a defined border

Transport: The opportunity exists to improve and enhance White Hart Lane and Northumberland Park stations in order to support new housing and increase accessibility to the area.

Housing: The mono tenure nature of housing has resulted in a lack of housing in this area. Improvement and investment in existing housing estates could improve the quality of accommodation, create safer more permeable neighbourhoods and increase housing choice and supply—leading to a more mixed and balanced community.

Sports and Leisure: Facilitated by the Tottenham Hotspur stadium redevelopment the area can become a focal point for improved sports, leisure and cultural employment and amenities.

Heritage: Regeneration and modification of the urban structure would allow Heritage assets to be enhanced through greater legibility and investment in poorly maintained buildings.

Employment Land — there is the potential to look at the employment land designations and phased release without any net loss of jobs in order to facilitate a more diverse housing and economic profile.

Open Space : Opportunities exists to improve visitor facilities and recreational uses in the Lee Valley Regional Park in order to increase local and wider London usage .

Movement: A key issue in the area is east/west severance as a result of the linear railway lines and the block pattern of Tottenham's 60's housing estates. As a result the opportunity exists to improve movement across North Tottenham through enhanced investment transport infrastructure and investment in the increased legibility of natural desire lines.

4. South Tottenham Map

Key Issues and Challenges Map

Please note the areas are indicative only and do not represent a defined border



