



Sustainability Appraisal (SA) of the Strategic Policies Alterations

SA Report

Published alongside the pre-submission version of the plan

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INTRODUCTION

1 BACKGROUND

1.1.1 AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of Alterations to the Strategic Policies Development Plan Document (DPD); henceforth ‘the Strategic Policies Partial Review’. The purpose of the Strategic Policies DPD – which was adopted in its original form in 2013 - is to set out a long term vision of how Haringey should develop to 2026 and set out the Council’s strategy for achieving that vision, with broad locations identified for housing, employment and other uses.

1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including ‘equalities’ and ‘health’ issues¹), with a view to avoiding and mitigating adverse effects and maximising the positives. SA of DPDs is a legal requirement.²

2 SA EXPLAINED

2.1.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.³

2.1.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially ‘identifies, describes and evaluates’ the likely significant effects of implementing ‘the plan, and reasonable alternatives’.⁴ The report must then be taken into account, alongside consultation responses, when finalising the plan.

2.1.3 More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point**?
 - Including with regards to consideration of ‘reasonable alternatives’.
2. What are the SA findings **at this stage**?
 - i.e. in relation to the draft plan.
3. What happens **next**?
 - What steps will be taken to finalise the plan?
 - What measures are proposed to monitor plan implementation?

2.1.4 **Table 2.1** explains more about the regulatory basis for answering these questions.

2.2 This SA Report

2.2.1 This document is the SA Report for the Strategic Policies Partial Review, and as such each of the three SA questions is answered in turn below, with a ‘part’ of the report dedicated to each.

2.2.2 Before answering Question 1, however, there is a need to set the scene further within this ‘Introduction’ by answering two other questions.

¹ As part of this SA process, explicit consideration is being given to ‘equalities’ and ‘health’ issues, and as such this SA process can be said to be integrating Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). More on the SA scope – i.e. the scope of issues that are a focus of SA – is explained in Chapter 4.

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

³ Directive 2001/42/EC

⁴ Regulation 12(2)

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

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

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

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

⁵ Environmental Assessment of Plans and Programmes Regulations 2004

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

3.1 Overview

3.1.1 The purpose of the Strategic Policies DPD – once adopted in its revised form – will be to set out the long term vision of how Haringey, and the places within it, should develop by 2026 and sets out the Council's strategy for achieving that vision. In particular, it will identify broad locations for delivering housing and achieving other strategic development needs around employment, retail, leisure, community facilities and other uses.

3.1.2 The Strategic Policies DPD was adopted in its original form in 2013, and at the current time a **Partial Review** is being prepared, with the Council currently consulting on a 'Proposed Alterations' consultation document. The main influences on plan preparation are the National Planning Policy Framework (NPPF), which sets out a suite of national policies that Local Plans must adhere to; the London Plan (2015), which establishes housing and employment targets for Haringey; and the adopted Strategic Policies DPD (2013). The Partial Review is also being developed in-light of the plans of neighbouring authorities (adopted and emerging). This is important given the 'Duty to Cooperate' established by the Localism Act 2011.

3.2 What's the plan not seeking to achieve?

3.2.1 The Strategic Policies Partial Review is necessarily strategic in nature. The aim is not to allocate sites to be developed over the plan period, or to set out detailed development management policies. Detailed issues are omitted from consideration in the knowledge that they can be addressed through the Site Allocations DPD, the Development Management Policies DPD and Area Action Plans (AAPs).



4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

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

Consultation on the scope

4.1.2 The Regulations require that: *"When deciding on the scope and level of detail of the information that must be included in the [SA] Report, the responsible authority shall consult the consultation bodies [who] by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans"*. In England, the consultation bodies are Natural England, the Environment Agency and English Heritage.⁶

4.1.3 As such, an SA Scoping Report was published for consultation in January 2007. In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council's consultation database. Subsequent to consultation the SA scope was updated.

4.1.4 Furthermore, SA scoping work was undertaken in 2012 and 2014 in relation to the Development Management Policies DPD and Site Allocations DPD respectively, which is also relevant to the Strategic Policies Partial Review SA.

4.2 Key issues / objectives

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

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

Table 4.1: The SA Framework

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

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> • Improve lifelong learning opportunities and work related training? • Reduce high levels of unemployment and worklessness? • Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> • Improve physical accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> • Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity at designated and non-designated sites? • Link and enhance habitats and wildlife corridors? • Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> • Promote townscape character and quality? • Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> • Promote a network of quality, accessible open spaces? • Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> • Preserve ground and surface water quality? • Conserve water resources? • Incorporate measures to reduce water consumption?
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> • Encourage the development and remediation of brownfield land? • Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> • Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> • Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> • Minimise the impact of the ambient noise environment?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> Minimise the use of energy? Increase energy efficiency and support affordable warmth initiatives? Increase the use of renewable energy? Mitigate against the urban heat island effect? Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? Encourage the re-use of goods? Reduce the production of waste? Support the use of sustainable materials and construction methods? Increase the proportion of waste recycling and composting across all sectors?
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> Improve the amenity and connectivity of walking and cycling routes? Promote the use of public transport? Reduce the use of the private car? Encourage development in growth areas and town centres and reduce commuting?

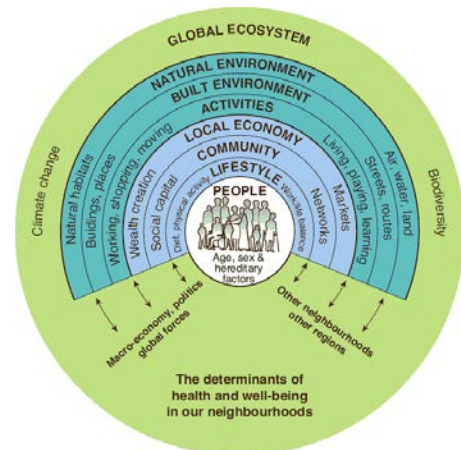
4.3 A note on ‘equalities’ and ‘health’ considerations

4.3.1 Equality and health considerations were a focus of SA scoping work. As such, it is the case that equalities and health issues are fully reflected in the SA scope, and hence the SA process ‘integrates’ Equalities Impact Assessment (EqIA) and Health Impact Assessment (HIA). **Appendix IV** signposts to areas within this report where EqIA and HIA has ‘fed-in’.

Box 4.1: EqIA and HIA

The Council has a duty to give "due regard" to promoting equality of opportunity for all protected groups when making policy decisions; and publish information showing how they are complying with this duty. ‘Protected groups’ are those with the following characteristics: age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

With regards to **HIA**, the NPPF requires planners to promote healthy communities and use evidence to assess health and wellbeing needs; and additionally, the GLA and the Mayor are required to ‘have regard to health’ in preparing strategies at the London-scale. It is important to understand that HIA is to a large extent about giving consideration to the wider *determinants of health*, including those related to the quality of the natural and built environment, people’s daily activities and lifestyles, and local communities and the economy.



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

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

5 INTRODUCTION (TO PART 1)

5.1.1 This 'Part' of the report explains how SA has informed and helped to shape development of the Strategic Policies Partial Review. It is here that information is presented on the appraisal of 'reasonable alternatives'.

5.1.2 Specifically, this chapter is structured as follows:

Chapter 6 - Introduces the alternatives that have been a focus of appraisal (with a view to demonstrating the 'reasonableness' of the approach taken)

Chapter 7 - Presents appraisal findings in relation to reasonable alternatives

Chapter 8 - Explains the Council's reasons for selecting the preferred approach – as set out in the proposed submission plan - in-light of alternatives appraisal.

5.1.3 Providing information on reasonable alternatives, and explaining how consideration of reasonable alternatives has fed into plan-making, is important from an SEA Regulations compliance perspective.⁷

[Aside from alternatives appraisal, how else has SA influenced plan-making?](#)

5.1.4 In addition to alternatives appraisal, development of the draft (pre-submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the 'Proposed Alterations' consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the draft plan as it currently stands.

⁷ In-line with the SEA Directive / Regulations the SA Report must present an appraisal of the draft plan and 'reasonable alternatives' as well as 'outline reasons for selecting the alternatives dealt with'.

6 REASONS FOR SELECTING THE ALTERNATIVES DEALT WITH

6.1 Introduction

6.1.1 The aim of this chapter is to explain the set of alternatives that has been a focus of appraisal, with a view to demonstrating the 'reasonableness' of the approach taken.

6.2 Background

6.2.1 The Partial Review of the adopted Strategic Policies DPD is being developed in response to a number of changes in the overarching planning framework, including at the national and regional level, which affect planning locally. These changes include:

- The 2011 Census, which set out higher than previously projected population growth figures for London, prompting the Mayor of London to prepare and subsequently adopt the Further Alterations to the London Plan (FALP) that significantly increased Haringey's -
 - housing target - from 820 to 1,502 homes per annum (an 83% increase); and
 - employment target - 22,000 additional jobs 2011-2036 (a 30% increase).
- Changes to permitted development rights, which give greater scope for the permitted change of use of offices and shops to go to residential development, as well as provision for larger residential extensions.
- The introduction of both a Mayoral and Haringey Community Infrastructure Levy (CIL), which changed the way in which new development contributed financially or in kind towards the provision of strategic and local infrastructure required to support communities.
- The preparation of further key local evidence base studies, including an Open Spaces study, an Urban Characterisation Study, and a Strategic Housing Market Assessment, as well as updates to existing studies on employment land, development viability and housing land availability (through the London-wide SHLAA). These new and updated studies inform understanding of site development capacities, the local economy and demands for various land uses.
- The new Housing Zone designation applied to Tottenham, which will see significant public and private investment committed to the area to unlock its development potential and accelerate housing delivery, prompting the Council to consider integration with its comprehensive regeneration framework for the area and a dedicated Area Action Plan.
 - The Tottenham Housing Zone was designated on the basis that: *"This area of Haringey is one of the capital's big growth opportunities. Ambitious regeneration plans supported by a Housing Zone will see 10,000 new homes built and 5,000 new jobs created by 2025. The Zone will offer opportunities to build almost 2,000 new homes around and on top of a redeveloped Tottenham Hale station and open up the Lee Valley Regional Park with two new bridges."*⁸

6.2.2 In light of these changes, there is a need to:

- Make a range of factual updates to the Strategic Policies, with a view to bringing the DPD up to date and ensuring consistency with the current national and regional planning position; and
- Establish how best to deal with significantly increased housing and employment targets for Haringey.

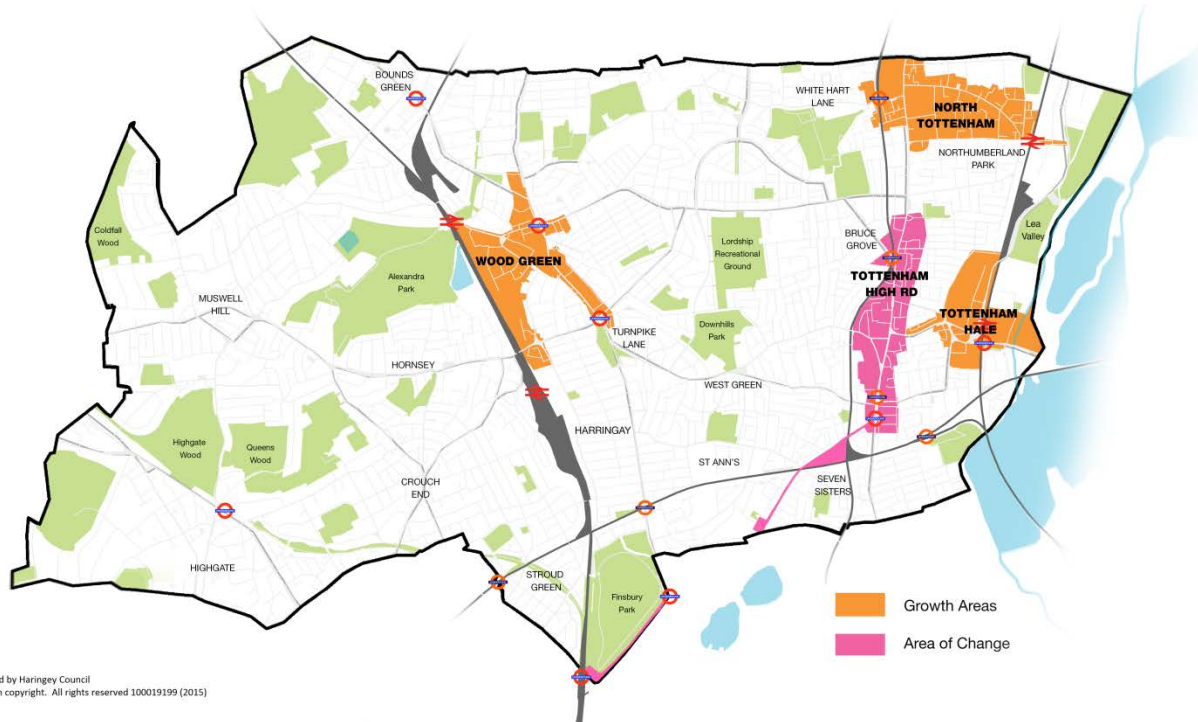
6.2.3 It is the second matter that ('reasonably') must be the focus of alternatives appraisal.

⁸ See <https://www.london.gov.uk/media/mayor-press-releases/2015/02/mayor-names-londons-first-housing-zones> (accessed 11/15)

6.3 Identifying alternatives

6.3.1 The default approach is to apply the higher growth figure (1,502 homes per annum) to a the spatial strategy established in the adopted Strategic Policies, with minor updates to selected Growth Areas / Areas of Change to reflect new evidence on site capacity. This spatial strategy is depicted in **Figure 6.1**.

Figure 6.1: The 2013 spatial strategy, updated to reflect new evidence on site capacity



6.3.2 Through discussions with the Council two other options were established, so that the reasonable alternatives are as follows –

- Option 1 -** The 2013 spatial strategy in the adopted Strategic Policies document, with updates to selected Growth Areas / Areas of Change, reflecting new evidence on site capacity (see **Figure 6.1** above).
- Option 2 - Dispersed growth** with each ward taking a roughly equal share of the additional housing (i.e. the additional 682 homes per year) above and beyond the existing spatial strategy.
- Option 3 - Town centre and Crossrail 2 focused growth**, with the additional housing (i.e. the additional 682 homes per year) focused at hubs in and around all town centres and Crossrail stations.

6.3.3 These alternatives were previously a focus of appraisal and consultation in February 2015. No other spatial distribution options were suggested through the February 2015 consultation (although numerous comments were received with respect to the preferred strategy).

What about alternative growth quanta?

- 6.3.4 A large number of Regulation 18 stage consultation comments were received on the uplift in housing growth that needs to be managed within the borough as a result of the updated London Plan (2015). Those representing the development industry and landowners, as well as the statutory bodies, welcomed the fact that the Council had chosen to undertake a partial review of its Strategic Policies DPD to take account of the new strategic housing requirement. Conversely, a number of local residents and resident groups were concerned with the ability of the borough to accommodate and manage growth of this level. Having now been adopted, the borough housing figures in the 2015 London Plan are a key tenet of the regional spatial strategy for the Capital, and Haringey's Local Plan must give effect to this to be considered 'sound'. As there is no scope to reduce the housing figure, it is not considered appropriate to test alternative scenarios in this regard.

Aside from alternatives appraisal, how else has SA influenced plan-making?

- 6.3.5 In addition to alternatives appraisal, development of the draft (pre-submission) plan has also been influenced by appraisal of a working draft version of the plan (specifically, appraisal of the preferred approach as presented within the draft plan consultation document of February 2015). The influence of SA work from that stage is not explained here (in 'Part 1'), but rather is explained in 'Part 2' below, which deals with the appraisal of the current draft plan.

7 ALTERNATIVES APPRAISAL FINDINGS

7.1 Introduction

7.1.1 The aim of this chapter is to present alternatives appraisal findings in relation to the set of alternatives introduced above (in Chapter 6).

7.2 Methodology

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

7.2.2 **Red shading** is used to indicate significant negative effects, whilst **green shading** is used to indicate significant positive effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the scenarios. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a 'no plan' scenario). In light of this, there is a need to make considerable assumptions regarding how the scenarios will be implemented 'on the ground' and what the effect on particular receptors will be. Where there is a need to rely on assumptions, this is made explicit in the appraisal text (although this can create tensions with the desire to ensure conciseness / accessibility).

7.2.3 In many instances, given reasonable assumptions, it is not possible to predict likely significant effects, but it is possible to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to make a distinction in terms of 'significant effects'.

7.2.4 Effects are predicted taking into account the criteria presented within Regulations.⁹ So, for example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. where the effects of the plan may combine with the effects of other planned or on-going activity that is outside the control of the Strategic Policies).

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

⁹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004



7.3 Appraisal findings

7.3.1 Detailed alternatives appraisal findings are presented within **Table 7.1**, with summary findings then presented in **Table 7.2**.

7.3.2 The appraisal methodology is explained above, but to reiterate: For each topic / row, the performance of each scenario is categorised in terms of ‘significant effects (using **red / green**) and also **ranked** in order of preference. Also, ‘ = ’ is used to denote instances where the alternatives perform roughly on a par.

N.B. Appraisal findings are largely unchanged from the February 2015 Interim SA Report.

Table 7.1: Spatial strategy alternatives appraisal findings


Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Crime	Compared to other London boroughs, crime levels in some areas are high in Haringey with residents concerned about safety, gang activity and high crime rates. Northumberland Park is considered particularly vulnerable for crime. As all three options involve significant regeneration of Northumberland Park all are considered likely to have similarly positive effects on crime. However, effects are not considered likely to be significant given the limited extent to which the planning system can influence crime and anti-social behaviour.		=	
Education	<p>Educational attainment in Haringey is improving, but it remains below London levels. In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds.</p> <p>It is clear that the high level of housing growth being planned for the borough will require new and improved provision of educational facilities. Options 1 and 3 should better ensure high quality educational facilities are accessible to residential areas (including deprived areas in the east of the borough). This is on the basis that housing growth would be more spatially focused, thus facilitating the provision of educational facilities in these growth areas (supported by the pooling of s106/CIL contributions from these residential developments).</p> <p>In contrast Option 2 would spread housing development and thus educational demand more widely; it is assumed this demand would be more difficult to meet cost effectively as it would require additional capacity in a large number of spatially distributed schools (some of which may have limited scope for expansion).</p> <p>The significance of the effects on this objective are uncertain as access to educational facilities will depend on many other factors (e.g. availability of funding for educational facilities and timely provision of additional capacity to ensure that educational access is not actually reduced due to a lack of capacity as housing numbers and thus demand grow).</p>		2	

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Health	<p>Health inequalities in Haringey are marked; the most deprived areas in the east of the borough tend to experience the poorest health with a nine year gap in life expectancy for Tottenham compared with the rest of the Borough. Improving health and addressing health inequalities requires a targeted approach to addressing the wider determinants of health (e.g. access to green space and healthy food, air quality, housing, employment) as well as improved access to health services.</p> <p>All options will contribute to improved health and reduced health inequalities to the extent that they improve access to high quality housing, including for the poorest (although the baseline of 'no plan' would also involve this growth given the housing target in the Further Alterations to the London Plan).</p> <p>Option 1 and 3 should better ensure new and improved health facilities are accessible to residential areas (including deprived areas in the east of the borough) because housing growth would be spatially focused, thus facilitating the provision of such facilities in these growth areas (supported by the pooling of s106/CIL funding from these residential developments). In contrast Option 2 would spread housing development and thus health demand more widely, making it harder to address. Given the baseline situation, significant effects are predicted.</p>	★ 1	2	★ 1
Housing	<p>Affordability of housing is a significant issue in the borough. Social rented housing in the east of the borough, with substandard rented housing concentrated in Bruce Grove and Northumberland Park.</p> <p>While all options involve the development of the same quantum of new housing, Option 1 concentrates most new housing in Bruce Grove and Northumberland Park as it applies the higher growth figure to the existing spatial strategy which includes Areas of Change focused on Bruce Grove and Northumberland Park (moreover the proposed review would involve upgrading North Tottenham, which includes Northumberland Park, to a growth area based on new evidence of capacity). Option 1 should therefore support substantial improvement of the quality of housing in these two areas of need (and should also help to address related issues such as overcrowding and poor design and layout). Significant positive effects are predicted.</p> <p>With regards to Option 2, it is appropriate to conclude significant negative effects, as there are major uncertainties around deliverability. In practice there may be insufficient sites in some wards for every ward to take a roughly equal share of the additional housing. In contrast, Option 1 is supported by evidence of site availability and capacity.</p> <p>With regards to Option 3, there are also some risks around deliverability given uncertainties around Crossrail 2 and the sites that will be available for housing.</p>	★ 1	3	2

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Community Cohesion	The Tottenham riots of 2011 highlight the need for greater community cohesion in this area in particular. All three options would involve significant housing growth in Tottenham, with Option 1 proposing the most. The aim is for housing growth to stimulate regeneration, with the effect in the medium to long term that stable and cohesive communities develop. However, there are risks as area change could bring some disruption to existing communities. Redevelopment and re-provision, such as with estate renewal, should be undertaken sympathetically and collaboratively with the local community. There is an opportunity for new development to deliver improved community infrastructure as part of regeneration proposals; however effects across all three options are uncertain at this stage.		=	
Accessibility	Access to cultural and leisure facilities and to essential services (banking, health, education) varies between neighbourhoods. If it is assumed that most cultural and leisure facilities and essential services are located in or near town centres then Option 3 would be considered the preferred option as this most concentrates housing in such locations, thereby doing most to improve access. Option 1 also has a significant focus on town centres and high areas of PTAL and is thus ranked a close second; whilst Option 2 would disperse housing most and thus would potentially result in the development of some housing with poor access to cultural and leisure facilities and essential services. As with the discussion above under the 'health' heading, it is appropriate to conclude 'significant' effects, given the issues that exist.	2	3	★1
Economic Growth	High and increasing unemployment is perhaps the greatest challenge facing the borough; Tottenham has some of the highest levels of unemployment in London and the UK. All options should, through increasing the number of residents, generate new demand and thus new employment opportunities (although the baseline of 'no plan' would also involve this growth given the housing target in the Further Alterations to the London Plan). It is not considered that the alternatives would have a marked differential impact on this objective. Employment policies will have a much greater and more direct impact on local economic growth.		=	
Skills and Training	The alternatives have little bearing on this topic as they focus on housing delivery rather than skills and training. However it may be possible to secure skills and training benefits for local people through the construction process.		n/a	
Economic Inclusion	Assuming that existing and new jobs are concentrated in town centres and strategic industrial locations, then Options 1 and 3 perform best as new homes would be concentrated to a greater extent in and around these areas. Significant effects are unlikely as other factors - e.g. policies on protection and enhancement of employment uses - are overriding.	★1	2	★1

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Town Centres	<p>Housing under all three options would support the viability and vibrancy of town centres (including at the new Tottenham Hale district centre; assuming core retail and services are not displaced). However, Options 1 and 3 perform best as more homes would be delivered near to town centres. Options 1 and 3 would likely lead to significant positive effects, assuming new housing will be of high quality and will contribute to promoting town centres.</p>	★ 1	2	★ 1
Biodiversity	<p>The Lee Valley Regional Park straddles the eastern boundary of Haringey although access is a significant problem. The borough has a total of 60 areas designated as Sites of Importance for Nature Conservation Importance (SINCs), which are spread across the borough.</p> <p>Developing new housing on sites near to SINCs would allow residents to access green spaces and biodiversity; on the other hand it could negatively impact biodiversity through building impacts (e.g. overshadowing of green spaces, light/noise disturbance to wildlife) and/or increased disturbance as a result of increased use of such spaces by a growing local population.</p> <p>The dispersed growth scenario (Option 2) might mean less flexibility to locate housing where it would not negatively impact on biodiversity, but the baseline of ‘no plan’ would also involve this same level of growth given the housing target in the Further Alterations to the London Plan so the effect is uncertain.</p> <p>Overall there is considered to be insufficient information to judge the relative performance of the alternatives on biodiversity, and there can be no certainty with regards to significant effects.</p>	=		
Townscape and Cultural Heritage	<p>Haringey has significant heritage assets including many Listed Buildings and 29 Conservation Areas which are distributed across the borough.</p> <p>Housing redevelopment can provide opportunities to preserve and enhance heritage assets and their settings (e.g. by re-establishing building lines), and there is the potential to deliver on this objective in the east of the borough. However, the scale of regeneration proposed will need to be carefully managed to ensure that existing assets and conservation areas are treated sensitively.</p> <p>In the west of the borough, which would see increased growth under Option 2, the nature of the townscape within town centres and Conservation Areas means that heritage assets are more sensitive to development, and higher buildings in particular. Option 2 could potentially lead to significant negative effects, although there is uncertainty.</p> <p>Option 3 promotes development at all town centres; and has the potential to have some negative effects in areas under Option 2; but as the scale of development in such areas would likely be less than under Option 2.</p>	★ 1	3	2

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Open Space	<p>The Lee Valley Regional Park straddles the eastern boundary of Haringey although access is a significant problem. Haringey also has a number of important green open spaces distributed across the borough from Highgate Woods in the west to Bruce Castle Park in the northeast. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward.</p> <p>The impacts of the alternatives on addressing these deficiency areas is somewhat uncertain (e.g. connectivity to existing open spaces could be enhanced through housing redevelopment and associated wider regeneration in these areas, on the other hand the pressure for housing delivery could further erode open space provision); however, assuming that the existing spaces are well protected and will not be significantly eroded by housing development, it is possible to conclude that the alternatives would have little impact on this objective (recognising that the baseline situation is one whereby housing would come forward in any case, in-line with the London Plan).</p>	n/a		
Water Resources	<p>The significant levels of housing growth proposed will result in increased water demand and potentially also increased risks to ground and surface water quality from development. However the level of housing growth is a given as a result of the revised housing target for Haringey in the Further Alterations to the London Plan. It is not considered that the alternatives would have a marked differential impact.</p>	n/a		
Soil and Land Quality	<p>Development under any option is likely to be on brownfield land as growth areas and change areas are located in existing densely built areas and green space in Haringey covers a small part of the total area and is protected by various designations. All three options are therefore considered likely to result in negligible effects on the land baseline in terms of encouraging the effective use of land through the development of brownfield land.</p>	n/a		
Flood Risk and Climate Change	<p>The main source of flood risk within the borough is the River Lee; there is also some risk from surface water and groundwater flooding. Notably, Tottenham Hale has more than 50% of the ward lying within Flood Zone 2; and parts of the east side of the Northumberland Park growth area lie within Flood Zone 2.</p> <p>It is therefore considered that Option 1 performs worst as it concentrates most housing growth in Tottenham Hale and Northumberland Park. There are not likely to be significant negative effects however, given existing flood risk policy in the NPPF, London Plan and adopted Strategic Policies document. There is good potential to implement mitigation measures (e.g. the emerging DM Policies DPD includes policies on flood risk management and drainage).</p>	2	★1	★1
Air Quality	<p>The area suffers poor air quality, primarily because of traffic congestion. Improving air quality is a challenge, particularly</p>	n/a		

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
	<p>along major roads.</p> <p>While some options may concentrate growth more in certain locations than others, whether or not this is positive or negative for overall air quality impacts is unclear. Concentrating growth could concentrate emissions to the air and thus pollutant concentrations; conversely concentrating growth can support improved public transport thus potentially reducing transport emissions per capita.</p> <p>On balance, there is unlikely to be an effect on the baseline (which would involve housing growth in-line with the London Plan) under any option.</p>			
Noise	<p>There is little baseline data available to inform the appraisal, however anecdotal evidence suggests concentrations of noise exist along transport corridors. While some options may concentrate growth more in certain locations than others, there is no potential to suggest that any option would involve concentrating growth at noisier locations.</p>		n/a	
Energy and Carbon	<p>Haringey is planning to develop decentralised energy networks to supply energy efficiently to buildings in Tottenham Hale and Northumberland Park, the latter connecting to an energy centre in the new Meridian Water development in Enfield (decentralised energy 'connection zones' are identified in the Development Management Policies document).</p> <p>As Option 1 involves the highest levels of development in these areas it was considered that it would benefit most from these decentralised energy networks in terms of securing a low carbon source of heat for new and existing buildings and potentially helping to reduce carbon emissions per capita. Option 3 was considered the next best performing against this objective as concentrating development in town centres and close to Crossrail stations should help to create heat demand clusters thereby facilitating the development of new decentralised heat networks. The more evenly distributed growth in Option 2 would be least amenable to supporting development of decentralised energy networks.</p> <p>Carbon savings from measures such as renewable energy generation on new homes (the opportunities for which are assumed to be the same for all options) and decentralised energy may be cancelled out by the substantial increase in population being planned for, possibly resulting in a net increase in energy and carbon emissions over the plan period, however it must be born in mind that the baseline of 'no plan' would involve similar levels of growth given the housing target in the Further Alterations to the London Plan.</p> <p>Wider factors will also have a significant bearing on net emissions, such as tightening of the energy efficiency standards for new homes (in the Building Regulations), however these changes will apply equally to all three options and the baseline scenario.</p>		3	2

Topic	Discussion	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Waste Management	<p>Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and recycling centres and these accept an increasing range of materials and items for reuse or recycling. Other waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the borough.</p> <p>It is judged that the alternatives would have little differential impact on waste generation and management relative to each other (therefore all are rated equally) and relative to the baseline of 'no plan' (as this would involve similar levels of growth given the housing target in the FALP). Strategic Policies, DM policies and emerging North London Waste Plan policies on waste and recycling will have a far greater effect on this objective.</p>		n/a	
Sustainable Transport	<p>Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes; Tottenham Hale provides particularly strong connections with underground and rail links. Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider Borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital.</p> <p>By concentrating more growth in Tottenham Hale and close to planned Crossrail 2 stations Options 1 and 3 best support access to these existing and emerging public transport links. However this is based on the assumption that the significant growth planned in these areas is sequenced to coincide with the development of enhanced transport links; if large scale development were to occur close to Crossrail stations but in advance of Crossrail being implemented, this could lead to major congestion and constrained access to public transport services.</p> <p>The more focused growth and regeneration proposed in Options 1 and 3 may also better enable the development of improved cycling and walking routes, reducing the need to travel by car or public transport for shorter trips. Significant positive effects are predicted under Options 1 and 3, contingent on Crossrail 2 coming online.</p>	★ 1	2	★ 1

Table 7.2: Spatial strategy alternatives appraisal findings - Summary

Relevant sustainability topics	Option 1 2013 strategy updated	Option 2 Disperse	Option 3 All TC and Crossrail
Crime		=	
Education	★1	2	★1
Health	★1	2	★1
Housing	★1	3	2
Community Cohesion		=	
Accessibility	2	3	★1
Economic Growth		=	
Economic Inclusion	★1	2	★1
Town Centres	★1	2	★1
Biodiversity		=	
Townscape and Cultural Heritage	★1	3	2
Flood Risk and Climate Change	2	★1	★1
Energy and Carbon	★1	3	2
Sustainable Transport	★1	2	★1

Option 1 and 3 perform equally well in terms of a number of objectives. In terms of ‘health’, ‘town centres’ and ‘sustainable transport’ significant positive effects are predicted and there is little to differentiate between the two options. Options 1 and 3 are also anticipated to have significant positive effects in terms of ‘accessibility’ related objectives, although in this instance the appraisal suggests that Option 1 is preferable.

Option 1 would also likely lead to significant positive effects in terms of housing and energy/carbon; however, it should be noted that under Option 1 there is the greatest likelihood of worsening flood risk locally, given that housing would be concentrated in flood zone 2. The appraisal also highlights some potential risks around ‘community cohesion’ under Option 1, and identifies the importance of taking this into account when planning for and implementing development consistent with the plan policies, in Tottenham in particular.

No significant positive impacts are identified for Option 2 (Dispersal), reflecting the fact that considerable opportunities would be missed through an approach that distributes growth. Significant negative effects are predicted in terms of ‘health’ and ‘accessibility’, given the challenges that would likely arise around infrastructure delivery. Significant negative effects are also predicted in terms of townscape / cultural heritage, although there is some uncertainty in this respect.

8 REASONS FOR SELECTING THE PREFERRED APPROACH

8.1 Introduction

8.1.1 The aim of this chapter is to explain the Council's 'outline reasons' for selecting the preferred approach subsequent to and in-light of alternatives appraisal. In other words, the aim is to explain why the preferred (proposed submission) strategy is 'justified', i.e. the most appropriate strategy, when considered against the reasonable alternatives.

8.2 The Council's reasons for selecting the preferred approach

8.2.1 The preferred approach is to apply the higher growth figures to the spatial strategy established in the adopted Strategic Policies DPD, with updates to selected Areas of Change / Growth Areas, reflecting new evidence on site capacity. This option ensures the spatial strategy for Haringey remains consistent with the approach previously developed through extensive consultation with the local community and other stakeholders, as well as through an iterative process of Sustainability Appraisal. The option is considered to be the most sustainable and deliverable of the alternatives considered, in particular given: the existing distribution of sites across the borough which are capable of accommodating future growth, taking account of development constraints, such as significant open spaces and sites of ecological importance; its capacity to both optimise and facilitate focused provision of infrastructure, services and facilities to support growth; and its conformity with the spatial development strategy for London and alignment with the Council's key regeneration objectives, with a focus on areas of need. Further policies, such as Development Management Policies and Site Allocations, will give effect to the spatial strategy and appropriately address matters raised in the SA (e.g. flood risk) through site specific requirements. The SA finds the preferred approach to perform well against alternatives, with likely significant positive effects across a range of sustainability objectives.

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

9 INTRODUCTION (TO PART 2)

9.1.1 This part of the report presents an appraisal of the Strategic Policies Partial Review as it currently stands, i.e. as presented within the current ‘pre-submission’ document.

10 APPRAISAL OF THE DRAFT PLAN

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

10.2 Methodology

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

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

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

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

10.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹⁰ So, for example, account is taken of the probability, duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects. These effect ‘characteristics’ are described within the appraisal as appropriate.

¹⁰ Environmental Assessment of Plans and Programmes Regulations 2004

10.3 Crime

- 10.3.1 Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. Essentially, issues relate to designing development that reduces levels of crime and the fear of crime as well as levels of anti-social behaviour. There is a need to address unemployment in order to tackle rates of acquisitive crime (domestic burglary, theft of a motor vehicle, theft from a motor vehicle and robbery of people or business).
- 10.3.2 The **2011 Strategic Policies SA Report** did not identify the likelihood of the Strategic Policies leading to significant effects, but did find that SP11 (Design), which proposes “Secured By Design” principles for new developments, SP1 (Managing growth) and SP10 (Town Centres) could indirectly contribute to this SA Objective by including housing in town centre expansion and intensification. Providing housing in town centres could increase natural surveillance, particularly in the evenings, which could deter crime.
- 10.3.3 The **Partial Review** proposes a significant increase in development in the centre and east of the borough which is where crime rates are the highest in the borough. A higher scale of development, particularly in North Tottenham and Northumberland Park, should have positive effects if delivered in-line with Secured by Design principles (SP11). Furthermore, a greater mix of uses in town centres should encourage activity throughout the day and into the night whilst also encouraging natural surveillance and overlooking of public areas.
- 10.3.4 Revised policy SP2 (Housing) provides greater support for strategic improvements to estates, or their renewal, which could lead to benefits in more disadvantaged parts of the borough. The housing estate improvement and renewal programme can facilitate physical improvements to estates that are poorly laid out, an issue that continues to hamper efforts to address localised problems of anti-social behaviour (as well efforts to improve access to public transport, and create better and more useable amenity spaces).
- 10.3.5 The proposed review provides for greater employment opportunities and employment densities to be delivered through the Site Allocations DPD and the Tottenham AAPs; as well as increasing employment in Wood Green. This should help to reduce acquisitive crime in the centre and east of the borough by improving job prospects locally.
- 10.3.6 SP16 (Community Facilities) requires new development to deliver new or contribute towards the required supporting infrastructure alongside new development. An increased scale of development has the potential to lead to increased provision of such facilities; which should lead to improved access to facilities for young people to engage in leisure activities and community activities. This has the potential to reduce anti-social behaviour by providing additional activities for young people.
- 10.3.7 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to be beneficial in terms of reducing crime and the fear of crime; however, significant effects are not predicted. Design of new development and improved local employment prospects are amongst many things that affect crime rates.

10.4 Education

- 10.4.1 There is a need to increase participation and attainment in education for all, not least by improving access to education and training facilities. School attainment in the area is significantly below the London average, with children and young people who live in the more deprived areas of Haringey (e.g. White Hart Lane, Northumberland Park and Seven Sisters) tending to have a lower level of achievement than those from more affluent backgrounds further to the west. As the population grows more school spaces will need to be created.

- 10.4.2 The **2011 Strategic Policies SA Report** did not identify the likelihood of the Strategic Policies leading to significant effects, but did find that educational facilities are to be provided under SP16 (Community Infrastructure) and SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion). Also, SP1 (Managing growth) will ensure that new facilities are provided in growth areas; and SP7 (Transport) will have an indirect positive contribution by improving access.
- 10.4.3 Focusing on the proposed **Partial Review**, an increase in the local population (though SP1) will require a commensurate increase in education facilities to support the additional residents through Policy SP16. A greater number of new and expanded schools would likely improve the quality and accessibility of provision; particularly in areas that have lower educational provision in the east of the borough around Northumberland Park and Seven Sisters.
- 10.4.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review could potentially lead to an increased scale of development and focus on areas of lower educational attainment, which in turn might lead to significant positive effects on the education baseline; however the nature of the effect is largely dependent on the emerging Infrastructure Delivery Plan (IDP), the Tottenham AAP and Site Allocations DPD.
- 10.5 Health**
- 10.5.1 There is a need to improve access to health services, extend life expectancy and improve wellbeing, including by increasing access to open spaces and sports facilities. High levels of deprivation in the area are linked to health and wellbeing challenges e.g. high rates of obesity. Access to GPs is significantly poorer in the east of the borough than in other parts of Haringey and when combined with the level of planned growth in Tottenham this necessitates a need for development of additional health infrastructure.
- 10.5.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through improved health facilities (SP14) and also noted the potential for positive effects through SP2 (Housing), 11 (Design), 13 (Open Space and Biodiversity), SP14 (Health and Well-being), SP15 (Culture and Leisure) and SP16 (Community Infrastructure).
- 10.5.3 The increase in development under the proposed **Partial Review** will result in an improvement in quantity and accessibility of GP services through SP16; particularly in the more deprived areas to the centre and east of the borough which is a focus of growth.
- 10.5.4 Accessibility to open space is an issue with development being delivered in the east of the borough where there is generally worse accessibility to open space (notably at Northumberland Park and Bruce Grove). Overcrowding at open space could be an issue; although these areas will also have improved access to the Lee Valley Regional Park.
- 10.5.5 The proposed spatial strategy focusses new development at areas within and adjacent to town centres; which should help to increase uptake in active travel (walking and cycling). Also, investment in leisure and community facilities (SP16) should help improve accessibility to opportunities for exercise and also improve mental well-being through increasing the ability to join social gatherings and maintaining social networks; helping to combat isolation and build social capital. These connections should prove particularly beneficial in Haringey where the local population is so transient.
- 10.5.6 A new commitment to estate renewal and improvement in SP2 has the potential to improve the quality of the dwelling stock in deprived areas; which may help to improve the health of residents; reduce overcrowding and increase life expectancy.

10.5.7 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to enhance the already significant positive effects of the Strategic Policies. The nature of the effect is, however, dependent on the Infrastructure Delivery Plan (IDP), Tottenham AAP and Site Allocations DPD.

10.6 Housing

10.6.1 There is a need to provide greater choice, quality, quantity and diversity of housing across all tenures to meet the needs of residents. This will involve refurbishing existing stock (many existing homes do not meet required standards of decency) as well as developing new supply. The aim is to create more mixed communities that have a balance of different types of housing which offer quality, affordability and sustainability (Haringey's Housing Strategy 2009-19). Affordability of housing is also a significant issue in the area. Over 60% of all social housing in the borough is located in the Tottenham wards. High levels of homelessness and overcrowding are also significant issues.

10.6.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through increased housing development (SP2 and SP10) and also noted that SP2 (Housing) provides for maximising housing provision and providing to meet different housing needs. Furthermore, SP1 (Managing Growth) directs growth, which includes housing, to areas of opportunity and deprived areas (Tottenham Hale, Seven Sisters Corridor and Northumberland Park); and SP10 (Town Centres) seeks to provide housing through town centre expansion and intensification. In combination, these policies will contribute to the achievement of housing objectives in the borough.

10.6.3 The proposed **Partial Review** seeks to deliver a higher quantum of housing in order to meet identified needs in the London Plan; increasing the strategic delivery target from 8,200 to 19,802. This should have a positive effect in comparison to the existing Strategic Policies as it ensures that sufficient housing will be delivered to meet demand; with commensurate benefits in terms of addressing affordability, overcrowding and the condition of the existing dwelling stock.

10.6.4 New housing is focused on the east and centre of the borough where housing affordability and the quality of the existing dwelling stock is at its lowest. Estate renewal and improvement (SP2) and town centre intensification (SP1) has the potential to increase housing delivery in accessible locations where residents are able to access employment opportunities.

10.6.5 Importantly, there is a commitment to ensuring no loss of social housing floorspace through the estate renewal programme, and a commitment to rebalancing the supply of social housing, ensuring that the acute need for family housing is better addressed. This policy approach is largely in-line with a **recommendation** made within the February 2015 Interim SA Report (*"The policy might be strengthened to state that estate renewal schemes should, subject to viability considerations and creating mixed and balanced communities, seek to achieve 'no net loss' in affordable housing"*). Also, it is noted that supporting text now responds to a second **recommendation** from February 2015 (*"The Council should ideally develop an approach collaboratively with local residents and stakeholders to help ensure that existing communities are not adversely affected; and that residents have a say in shaping regeneration efforts"*), with supporting text now committing to appointing an independent advisor who can advise residents on rights and options at all stages of the renewal process.

10.6.6 The review is set to alter the policy approach to affordable housing, with the threshold decreased from 50% to 40% on sites over 10 dwellings (based on updated viability evidence). Although the affordable housing threshold has been reduced, the corollary of this is that a greater number of developments are now likely to be viable and deliverable which, when combined with the overall increase in the housing quantum through the proposed review, would lead to a significant increase in the absolute number of affordable housing delivered during the plan period when compared to the existing Strategic Policies.

- 10.6.7 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to have a **significant positive effect**. There remain some uncertainties in the appraisal regarding the implications of estate renewal for certain sectors of the community; however, it is recognised that the Council has responded to consultation responses and past appraisal findings, and amended the preferred approach accordingly in order to achieve the best outcomes.

10.7 Community cohesion

- 10.7.1 There is a need to promote a sense of community belonging and spirit, including by supporting relationships between people from different backgrounds and community groups. Tottenham is one of the most ethnically diverse areas in the country and has a relatively transient population. Over three quarters (78.9%) of the population have a non-White British ethnic group, compared to 55.1% for London. There are some 200 different languages spoken in Tottenham. The Haringey 'Sustainable Community Strategy 2007-2016' sets out an ambition to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.
- 10.7.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through reduced social exclusion and inequalities, and improved access to services and amenities (SP2, SP10, SP15 and SP16). It also noted that: SP1 (Managing Growth) and SP16 (Community Infrastructure) provide for community facilities; SP15 (Culture and Leisure) promotes cultural venues; SP11 (Design) may help improve community identity; and SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion) may have an indirect effect on community cohesion by providing the skills necessary for local residents to obtain employment.
- 10.7.3 By significantly increasing the housing quantum in Haringey the proposed **Partial Review** will also require, through SP15 and SP16, greater investment in leisure and community facilities. This will likely help to increase opportunities for exercise and also improve mental well-being through social gatherings and maintaining social networks; helping to combat isolation and build social capital. This has the potential to help create a sense of community where such community infrastructure is delivered; which is a particular issue in Haringey due to the transient population.
- 10.7.4 Estate renewal and improvement (SP2) has the potential to affect residents in deprived areas in the centre and east of the borough; and potentially minority communities. The process of redevelopment and re-provision needs to be sensitively managed and to this end it is noted the policy wording has been notably strengthened since February 2015, with supporting text now committing to appointing an independent advisor who can advise residents of their rights and options at all stages throughout any given renewal process. There is also a signpost to the Council's Housing Strategy, where options available to existing tenants and leaseholders are outlined.
- 10.7.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to improve provision of community facilities which will increase the potential for community cohesion, and with regards to estate renewal it is clear that the Council has responded to consultation responses and past appraisal findings, and amended the preferred approach accordingly in order to achieve the best outcomes. It is now possible to predict **significant positive effects**.

10.8 Accessibility

- 10.8.1 There is a need to improve access to essential services and amenities for all groups, including cultural, health and leisure facilities. Access to GPs is particularly poor in the area and the level of planned growth in the borough means a need for additional infrastructure.

- 10.8.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects through improved access to services and amenities (SP1, SP7, SP10, SP13, SP15 and SP16). It also noted that SP1 (Managing Growth) focuses development in Tottenham Hale (Area of Opportunity), Haringey Heartlands (Area of Intensification), Seven Sisters and Wood Green Metropolitan Town Centre, where there are existing services and amenities and where regeneration plans would provide for additional services. Other policies identified as likely to contribute to this SA Objective were: SP13 (Open Space and Biodiversity), which provides for improvements to green spaces; SP16 (Community Infrastructure), which will ensure that community, health and education are provided to meet needs; and SP10 (Town Centres), which should ensure residents have access to services in these centres.
- 10.8.3 The proposed **Partial Review** (through SP1) will have the effect of increasing the annual housing target from 820 homes over the plan period to 820 homes for the period 2011/12 to 2014/15 and 1,502 homes from 2015/16 to 2025/26; focussing development in accessible town centre locations and areas of high PTAL; and increasing the quantum of supporting infrastructure delivered (SP16). Through focusing on Wood Green, the Seven Sisters Corridor, Tottenham and town centres this is likely to have a proportionately greater benefit than if development were elsewhere. This should help to improve access to town centre facilities and community infrastructure for existing and future residents. Additionally, further town centre services are likely to be more viable due to an increase in the local population; which could increase the accessibility to a variety of services available locally.
- 10.8.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review will likely lead to **significant positive effects**; however it should be noted that the significance of the effect is largely dependent on the content of the Infrastructure Delivery Plan (IDP) and site allocations outlined in the emerging Tottenham AAP and Site Allocations DPD.

10.9 Economic growth

- 10.9.1 There is a need to secure sustainable economic growth and business development, through increasing and diversifying employment opportunities; meeting the needs of different sectors of the economy and facilitating new land for business development. Compared to the rest of London, Haringey has levels of economic growth that are below average; a higher rate of unemployment and lower gross weekly pay per capita. However, Haringey also has the highest start-up of new businesses in London and the economy is dominated by small businesses with 90% of businesses employing 10 or fewer people. Evidence suggests that employment growth will come primarily from small and medium sized B1 businesses, the creative sector, and retail and leisure opportunities unlocked by the area's regeneration plans.
- 10.9.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of increased investment in regeneration areas (SP1, SP8 and SP10); however negative effects were predicted in terms of loss of employment land (SP8).
- 10.9.3 The proposed **Partial Review**, through changes to SP1, allows for increased development at town centres, particularly Wood Green, which should lead to positive effects in terms of economic activity. The proposed review also seeks to deliver additional jobs in Haringey Heartlands/Wood Green as part of mixed-use redevelopment. Also, changes to SP8 involve the de-designation of three Locally Significant Industrial Estates (based on the Employment Land Study 2014 and FALP); and adds additional policy protection for non-designated employment sites. This will lead to minor positive effects in terms of retaining existing employment opportunities; but also allow sufficient flexibility to adapt to changing market conditions and industrial/commercial requirements.

10.9.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review should help to retain and enhance employment opportunities and economic activity in the borough and update the Strategic Policies in order to capitalise upon changing commercial and industrial requirements in the period since the Strategic Policies were adopted. This is likely to result in a **significant positive effect** in relation to the baseline.

10.10 Skills and training

10.10.1 There is a need to develop the skills and training (included related facilities) needed to reduce unemployment and establish and maintain a healthy labour pool. Proportionately more Haringey employment than the London norm is with small firms often in the form of local retailers; which limits opportunities for employee training and progression within local firms. Evidence from providers active in the area suggest ongoing pressing demand for training in ESOL, literacy, numeracy and ICT, and predicts greater flows of people into employment once these skills barriers are addressed.

10.10.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved skills among working age residents (SP8, SP9 and SP16). It also noted that: SP9 (Improving skills and training to support access to jobs and community cohesion and inclusion) and SP16 (Community Infrastructure) provide for educational facilities to meet local needs while SP17 (Delivering and Monitoring the Core Strategy) provides for planning obligations which includes training. SP8 (Employment) also provides for training programmes. However, skills development would depend on the appropriateness of programmes and suitability to local residents.

10.10.3 The proposed **Partial Review** seeks to focus growth in the east and centre of the borough where unemployment and skills are lowest. This should increase the accessibility of jobs and help to reduce unemployment; improving the skills of the local population.

10.10.4 The increase in housing development (SP1) will deliver additional community facilities (SP16) which can include skills and training centres. The Infrastructure Delivery Plan and Site Allocations DPD will outline the required infrastructure in due course. Additionally other policies in the DM plan can include requirements for local employment, apprenticeships, work experience and training in order to improve the local skills base.

10.10.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review should have little effect. The main policy referenced in the 2011 appraisal (SP9) will remain unchanged. The review is likely to have a minor positive effect through delivering additional infrastructure that can assist in developing skills and qualifications; but it is considered that other planning policies in the DM plan and Site Allocations DPD are likely to have a more significant effect.

10.11 Economic inclusion

10.11.1 There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses. Tottenham has some of the highest levels of unemployment in London and England, particularly amongst young people; whilst the borough average performs reasonably favourably compared to London. The London Plan highlights the need to tackle persistent poverty and deprivation through a policy framework that helps tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need.

10.11.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of reduced unemployment (SP8). It also noted that other policies including SP8 (Employment), SP9 (Improving skills and training) and SP15 (Community Infrastructure) will provide opportunities for jobs and training which could potentially contribute to this SA Objective.

- 10.11.3 The proposed **Partial Review** (through SP1) seeks to deliver the additional housing in areas that have good PTAL; at town centres that have good access to the Underground, buses and future Crossrail 2 stations. This should have the effect of increasing accessibility to employment for new residents in both Haringey and beyond.
- 10.11.4 Also, through SP8 the Partial Review seeks to add a degree of support for the mixed use redevelopment of buildings within Local Employment Areas designated as 'Regeneration Areas'. This is a necessary response to the ambitious employment growth targets set by the London Plan (2015), and could lead to some implications given that an outcome could be a gradual shift in the nature of jobs available in Haringey (with increased prevalence of office jobs).
- 10.11.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review reflects a town centre focus, which should also help to encourage new businesses in sustainable locations whilst the approach to employment land in SP8 is flexible to adapt to changing industrial and commercial requirements. However, some uncertainties are noted around the policy support for changes to employment land, which could have implications for economic inclusion.

10.12 Town centres

- 10.12.1 There is a need to enhance the environmental quality of town centres (including quality of buildings and public realm), ensure they are easily accessible and meet local needs. Wood Green is the largest centre in the borough and is a Metropolitan Centre in the London Plan. Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The economic down turn has stunted the ability of many of Haringey's centres to fulfil their function effectively, with Crouch End and Green Lanes having the highest percentage of vacant town centre floorspace. Wood Green is the best performing of Haringey's town centres, with 3.3% vacant town centre floor space.
- 10.12.2 The **2011 Strategic Policies SA Report** identified the likelihood of SP10 (Town Centres), which proposes expansion and intensification of town centres, contributing to town centre vitality. In addition, SP1 (Managing Growth) promotes growth in regeneration areas and SP15 (Culture and Leisure) proposes development of cultural quarters in Wood Green and Tottenham, which should contribute to the vitality of town centres.
- 10.12.3 The increased housing target under the proposed **Partial Review** (through SP1) permits development across the borough which is likely to benefit all town centres; however a significant increase in development at Wood Green over-and-above the existing Strategic Policies should help to increase local spending and the accessibility of the Metropolitan Centre. Additionally, the increased scale of development at all centres (but Wood Green in particular) should facilitate additional investment in the public realm and help to improve the streetscene and image of Haringey's town centres.
- 10.12.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to result in a **significant positive effect**; however it is noted that existing design policies in SP11 and further policies in the DM DPD will also have an influence.

10.13 Biodiversity

- 10.13.1 There is a need to protect and enhance priority species and habitats, improve ecological connectivity and enhance access. The Lee Valley Regional Park, designated as a Special Protection Area, straddles the eastern boundary of the borough, although access is an issue. The River Lee Navigation and Pyre's Brook waterways also offer important habitat, as do numerous other Sites of Importance for Nature Conservation (SINCs).

- 10.13.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improvement in quality and provision of open spaces (SP13); however significant negative effects were predicted in terms of increased pressure on open spaces, biodiversity and habitats (SP1, SP2 and SP3). It also noted that: SP13 (Open Spaces and Biodiversity) safeguards open spaces from development, seeks creation of new open spaces, protects green infrastructure and promotes enhancement to habitats and designated areas; SP11 (Design) promotes green and brown roofs; and SP12 (Conservation) promotes protection and enhancement of historic parks and gardens as well as protection of historic buildings, which could provide habitats for bats, etc. Other policies indirectly contribute to this objective, including: SP1 (Managing Growth), which directs growth to regeneration areas; and SP10 (Town Centres) which promotes intensification of town centres. These policies will reduce pressure to develop in greenfield land, which should indirectly benefit biodiversity.
- 10.13.3 The proposed **Partial Review** will lead to an increased population in east of borough and hence could have an adverse effect on existing open spaces, and the Lee Valley Regional Park, as an important biodiversity resource. Some parts of the east have poor access to open space and it is difficult to implement new open space as this would require the demolition of some buildings. Intensive use of existing green and open spaces could affect their biodiversity and amenity value and lead to a decline in their quality and integrity; leading to negative effects. It is noted that the Lee Valley is set to benefit from increased accessibility through enhanced east/west connections.
- 10.13.4 On the plus side, the increased scale of development could fund strategic investment in green infrastructure (including the Green Grid) to help create a resilient network of green corridors, and improve open space. This would lead to positive effects compared to the baseline; particularly when focused in the east of the borough.
- 10.13.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to a significant effect. The 2011 appraisal findings still stand.

10.14 Townscape and cultural heritage

- 10.14.1 There is a need to preserve or where possible enhance buildings and areas of architectural and historic interest. The borough has 29 Conservation Areas which cover a large part of the west of the borough and the entire Tottenham High Road corridor in the east. The borough includes 467 Listed Buildings and 1150 locally listed Buildings of Merit. Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.
- 10.14.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved townscape and public realm (SP11, SP12 and SP14). It also noted that SP11 (Design) and SP12 (Conservation) will lead to benefits.
- 10.14.3 The proposed **Partial Review**, whilst recognising that growth needs to be distributed across the borough, reflects the constraints for significant development in the west areas, which in addition to offering few strategic redevelopment sites are more sensitive in terms of townscape and heritage considerations. This is a positive; however, there are still set to be some challenges in relation to managing development in other areas where there are heritage assets. Notably, Tottenham High Road has a significant number of Listed and Locally Listed Buildings as well as being a contiguous Conservation Area. Existing policies SP11 and SP12 will apply; however further DM policy will need to be robust and comprehensive in order to ensure that the scale of development proposed is sympathetic to its context and does not harm designated assets or their settings. Without such an approach there is the potential for significant negative effects.

10.14.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review leads to uncertain effects. Effects will be to a large extent driven by DM policy, the Tottenham AAP and the Site Allocations DPD, which will allocate sites and seek to put in place suitable development management policies.

10.15 Open space

10.15.1 There is a need to deliver a network of high quality, accessible open spaces. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. Haringey has a network of open spaces that are relatively fragmented. The All London Green Grid Framework presents an opportunity to enhance inter- and intra-borough green corridors.

10.15.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved landscape (SP11 and SP13); however significant negative effects were predicted in terms of increased pressure on open spaces (SP1 and SP2). It also noted that: SP13 (Open Spaces and Biodiversity) proposes to safeguard existing spaces from development and promote enhancements to the green infrastructure network; and SP11 (Design) proposes consideration of the setting of development.

10.15.3 The proposed **Partial Review** is unlikely to result in a situation where open space deficiencies can be addressed more fully (i.e. through SP13) given the built up nature of the borough. Significant growth is identified at Northumberland Park and Bruce Grove which are located in areas of deficiency. This, and development in the east of the borough more generally, is likely to exert increased pressure on existing open spaces and the Lee Valley Regional Park; although it is noted that the increased development can help fund and design-in improved accessibility to the Lee Valley Regional Park and to deliver the All London Green Grid.

10.15.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects. It is recognised that open space enhancement is a focus of the emerging Development Management Policies DPD and Site Allocations DPDs, although no opportunities are identified for allocating sites purely for the purpose of delivering new open space.

10.16 Water resources

10.16.1 There is a need to preserve water quality (ground and surface) and quantity and ensure the type and capacity of infrastructure is known for future development. The modification of rivers in the area including in-stream structures and culverts has led to loss of habitat diversity. Upstream of its upper confluence with Pymmes Brook the River Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality). Green roofs have the potential to play a significant part in reducing surface water runoff and storing rainwater.

10.16.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of in terms of increased water use (SP1 and SP2). It also noted that: SP1 (Managing Growth), SP2 (Housing) and SP10 (Town Centres) will maximise housing provision and as a result, increase water consumption. However, SP5 (Water Management and Flooding) will require developments to decrease the demand for water and improve the water environment and quality. There are also initiatives that Haringey supports to improve the River Lee.

10.16.3 The proposed **Partial Review** (through SP1) will lead to an increased scale of development and further increase net water use; however estate renewal (SP2) and the increased scale of growth incorporating water consumption reduction measures should help to reduce per capita water consumption, which in London is above the national average.

10.16.4 The increased scale of development also provides the opportunity for additional deculverting and river corridor enhancement, particularly in the east of the borough (where the majority of development is focussed). This would likely enhance water quality. A **recommendation** made within the February 2015 Interim SA Report (“It is recommended that policy is strengthened by requiring that development close to waterways helps to protect and where possible enhance water quality...”) has not been explicitly addressed through the Strategic Policies Partial Review, but DM policy in respect of water quality has been strengthened.

10.16.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects.

10.17 Soil and land quality

10.17.1 There is a need to encourage the effective use of land through the development of brownfield land (including where necessary the remediation of contamination). A variety of industrial land uses have left behind substantial contamination in Haringey which may need to be remediated before development.

10.17.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of increased use of previously developed land (SP1, SP2 and SP10). It also noted that: SP10 (Town Centres expansion) is expected to develop previously developed land; and SP1 (Managing Growth) directs development to regeneration areas with underused sites (Haringey Heartlands, Tottenham Hale, Seven Sisters and Wood Green Metropolitan Centre).

10.17.3 The proposed **Partial Review** seeks to increase the amount of previously developed land utilised through requiring additional housing and employment land to deliver the London Plan targets. This increases the potential for contaminated land remediation and is particularly the case at former industrial sites at Haringey Heartlands and in the Lee Valley corridor.

10.17.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to require a significant number of additional sites to be delivered, given the built-up nature of the borough the plan; more likely an increase in the density on available sites will be required. This is likely to have a negligible or very minor positive effect.

10.18 Flood risk and climate change

10.18.1 There is a need to reduce and manage flood risk from all sources, including through the use of sustainable drainage measures. The main source of fluvial flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. According to the SFRA surface water flooding is the source of flooding likely to have the greatest effect in Haringey. Flood risk is largely present in the east of the borough, with more than 50% of Tottenham Hale ward lying within Flood Zone 2.

10.18.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of increased resource use, waste generation and CO2 emissions (SP1 and SP2). Significant positive effects were predicted in terms of the potential to reduce energy use (SP4), deliver flood attenuation (SP5) and implement sustainable design and construction practices (SP11). It also noted that some areas of change are in or near flood risk zones (Tottenham Hale, Northumberland Park) and so the SP1 (Managing Growth) could have a significant adverse impact.

- 10.18.3 The proposed **Partial Review** (through SP1) seeks to distribute housing at town centres, at transport hubs and along transport corridors. This approach will deliver housing in the most accessible locations and near a large number of facilities, shops and services which should help to reduce the need to travel. It is acknowledged that increased development in the borough is likely to increase net resource use / emissions / waste generation, but the policy approach will have a positive effect in terms of reducing per capita effects.
- 10.18.4 Flood risk is a significant issue in Tottenham; however increased development in Tottenham will be made safe in-line with the NPPF, London Plan and emerging DM policy so no negative effects are predicted. Additionally the increase in development and application of SuDS techniques increase the number of opportunities for reducing surface water flooding.
- 10.18.5 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is likely to lead to minor positive effects.

10.19 Air quality

- 10.19.1 There is a need to improve local air quality, including through measures to reduce car use such as encouraging businesses to produce green travel plans. The area suffers poor air quality, primarily because of traffic congestion. The whole borough is an Air Quality Management Area, with monitoring sites located at Haringey Town Hall and Priory Park.
- 10.19.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of reduced air quality due to increases in traffic (SP1, SP2 and SP10); however significant positive effects were predicted in terms of reducing the impact of growth by promoting sustainable transport (SP7). It also noted that SP7 (Transport) could have a positive impact on air quality in the long term by reducing car dependency. Also, SP1 (Managing Growth) and SP10 (Town Centres) direct growth to regeneration areas and town centres which should reduce travel and indirectly contribute to air quality objectives.
- 10.19.3 The proposed **Partial Review**, through increasing the number of residents in the borough, is likely to be increased congestion as a result of the demand for transport. It is considered that by policy focusing growth at sustainable town centre, transport hub and corridor locations and areas with high PTAL and future accessibility to Crossrail 2; the review should help to reduce the need to travel and ensure that air quality is not significantly worsened by new development,
- 10.19.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review could lead to a minor negative effect; however, it is noted that DM policy will set specific criteria for managing air quality, as well as for travel plans in order to reduce the impacts of new development that has the potential to generate significant numbers of movements.

10.20 Noise

- 10.20.1 There is a need to minimise the impact of the ambient noise environment on quality of life. However, there is no suitable baseline data available in relation to noise issues.
- 10.20.2 The **2011 Strategic Policies SA Report** did not explicitly consider the potential for the Strategic Policies to result in significant effects in terms of 'noise'.
- 10.20.3 The proposed **Partial Review**, through an increase in development in the borough, is likely to increase noise through construction and operation. The majority of development is residential development, which is not considered likely to increase ambient noise levels in comparison to commercial and industrial sites. There are, however, considerations around the plan directing new housing to locations where there could be noise issues associated with nearby employment.

10.20.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to a significant increase in noise levels, recognising the need to plan in-line with the London Plan and emerging DM policy on noise.

10.21 Energy and carbon

10.21.1 There is a need to increase energy efficiency and support renewable energy. Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in the Upper Lee Valley and other areas.

10.21.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of the increase in emissions due to the scale of development proposed (SP1, SP2 and SP10); however significant positive effects were predicted in terms of introducing policy to reduce energy use. It also noted that: policies likely to contribute to this SA Objective include: SP4 (Working towards a Low Carbon Haringey), which promotes energy efficiency; and SP11 (Design), which promotes sustainable construction and methods (solar design, natural ventilation and better insulation). Both these policies could help reduce emissions from heating and energy use. In addition, SP7 (Transport), which promotes public transport, walking and cycling, has the potential to reduce car use and consequently, vehicle emissions.

10.21.3 The proposed **Partial Review** (through SP1) will lead to an increase in the local population and a likely increase in movements and emissions; although as stated under the appraisal for Air Quality this is largely offset through the sustainable location of development at town centres, in areas of high PTAL and at future Crossrail 2 locations. The spatial strategy will reduce the need to travel as well as increase the potential to connect to low carbon energy infrastructure and decentralised energy networks through delivering high density development in the east of the borough in locations able to connect to infrastructure in adjacent Central Leaside (in Enfield). Additionally, through redevelopment, including estate renewal (SP2), it should be possible to increase the environmental performance of buildings.

10.21.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects. Existing policies SP4 and SP11 will still apply.

10.22 Waste management

10.22.1 There is a need to reduce consumption of raw materials and increase re-use and recycling rates, notwithstanding the fact that Haringey currently achieves good recycling rates.

10.22.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant negative effects in terms of increased resource use, waste generation and CO2 emissions from new development (SP1, SP2 and SP10). It also noted that SP1 (Managing Growth) and SP2 (Housing) are likely to have a cumulative adverse effect through increased demand for resources. However, the Core Strategy addresses these potential impacts through the following policies: SP11 (Design), which promotes sustainable construction; SP4 (Working towards a Low Carbon Haringey), which promotes energy efficiency; and SP5 (Water Management and Flooding), which promotes reduction in water use.

- 10.22.3 The proposed **Partial Review** (through SP1) will lead to an increase in development compared to the baseline; but existing policies SP6 and SP11 remain extant and should ensure that per capita resource use, waste generation and water use decline; particularly when applied to estate renewal (SP2). The proposed review also looks to confirm that there will be a reduced waste apportionment for Haringey from 237,000 to 182,000 in the North London Waste Plan (NLWP); however site allocations will be a matter for the NLWP. There are currently two reuse and recycling centres, with other waste, if suitable, sent for incineration at Edmonton Waste Incinerator (in neighbouring Enfield), which also generates electricity for the borough.
- 10.22.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review is not likely to lead to significant effects.
- 10.23 Sustainable transport**
- 10.23.1 There is a need to improve walking and cycling routes, promote the use of public transport and reduce reliance on the private car. Haringey has some of north London's best public transport links; however, cycling currently only forms 2% of all journeys.
- 10.23.2 The **2011 Strategic Policies SA Report** identified the likelihood of the Strategic Policies leading to significant positive effects in terms of improved public transport, walking and cycling (SP7). It also noted that SP7 (Transport) promotes public transport, cycling and walking. Other policies which could potentially contribute to this Objective are: SP 1 (Managing Growth), which promotes growth in regeneration areas; and SP10 (Town Centres).
- 10.23.3 The proposed **Partial Review** focuses additional development in sustainable locations in town centres, in areas of high PTAL and at future Crossrail 2 stations. This is likely to reduce the need to travel and support sustainable transport, particularly at Wood Green Metropolitan Centre where the scale of development has particularly increased.
- 10.23.4 **In conclusion**, considering the proposed Partial Review against a baseline situation that involves implementation of the existing Strategic Policies, the review should ensure that the significant increase in population does not lead to a significant increase in congestion and motorised transport. In addition the focus on mixed-use development and increased employment in Haringey is likely to reduce out-commuting. This is likely to lead to a **significant positive effect** compared to the baseline.

10.24 Overall conclusions

- 10.24.1 The proposed Partial Review is likely to lead to significant positive effects on the baseline situation (i.e. a situation that assumes implementation of the existing Strategic Policies – see **Box 14.1**) in terms of a number of sustainability issues/objectives.
- 10.24.2 The increased residential development is focused at Growth Areas and Areas of Change outlined in the adopted Strategic Policies DPD. The scale of growth creates an opportunity for investment in infrastructure in the most deprived part of the borough, which should lead to benefits in terms of a number of sustainability objectives.
- 10.24.3 The spatial approach also seeks to address housing affordability; improve the condition of housing for existing residents; support economic growth ambitions; and reduce the need to travel. The review is also likely to have significant positive effects for town centres across the borough, most notably at Wood Green given the scale of development and its role at the top of Haringey's settlement hierarchy.
- 10.24.4 No negative effects are predicted, however some uncertainties are highlighted in terms of health, community cohesion, open space and air quality. Some uncertainties exist in relation to estate renewal (through SP2), which should have a positive effect through improving conditions, but which will need to be sensitively managed. It is noted that a number of changes have been made to the policy approach to estates renewal and improvement since February 2015, in response to **past SA recommendations** and consultation responses.

Box 10.1: Overall conclusions from the 2011 Strategic Policies SA Report

Overall, the Core Strategy is predicted to have positive effects particularly against the social and economic objectives. However, in terms of the environmental objectives, there are both positive and negative potential effects.

Overall positive social effects are predicted to be improvements relating to: provision of affordable housing, improving access to services, improving public transport infrastructure and improving and providing community, educational, leisure, cultural and health facilities.

Overall positive economic effects are expected from the protection of employment land, provision of training and skills programmes and promotion of development in town centres. Improvement in public transport infrastructure will also help support business activities through improved access.

Overall positive environmental effects are predicted to include improvements to: public realm, townscape and landscape; standards of design and construction and open spaces. Improved public transport and promotion of walking and cycling is likely to reduce car use and emissions. The Core Strategy includes policies relating to water use and flood risk and energy use,

Nevertheless, there are some negative effects predicted from the Core Strategy. The main issues relate to: resources use, increased traffic and pressure on land.

The proposed growth in Haringey will result in increased use of resources (energy, water and land) and generate waste. There will also be increased pressure on utilities and services. There are policies in the Core Strategy which seek to reduce resource use (SP4, SP5 and SP11) but there will still be net increase. Policies SP16 and SP17 address the need for facilities and infrastructure to support growth.

Developing Wood Green and other centres are likely to increase travel to these centres and increase traffic locally. However, travel to the district centres may reduce travel to centres outside Haringey. Also, improvements in public transport, cycling and walking routes may encourage more sustainable local modes of transport.

There are conflicting demands on land – employment, residential and businesses as well as open spaces. The Core Strategy proposes intensification in employment areas and town centres, which may help reduce pressure to build on open spaces.

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

11 INTRODUCTION (TO PART 3)

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

12 PLAN FINALISATION

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

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

13 MONITORING

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

- The effect of estate renewal on existing communities / community cohesion;
- The mix of affordable housing;
- Increase in population within areas of high/low PTAL;
- Development in areas of flood risk; and
- Use of green spaces and the Lee Valley Regional Park.

APPENDIX I - REGULATORY REQUIREMENTS (1)

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

Schedule 2

The report must include...

(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan
(c) the environmental characteristics of areas likely to be significantly affected;
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information
(i) a description of the measures envisaged concerning monitoring.

Interpretation of Schedule 2

The report must include...

An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness' of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> [Part 1 of the SA Report]
The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i> [Part 2 of the SA Report]
The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]
An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the Plan seeking to achieve?</i>
The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the scope of the SA?</i>
The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
Environmental characteristics of areas likely to be significantly affected	
Key environmental problems / issues and objectives that should be a particular focus of appraisal	

APPENDIX II - REGULATORY REQUIREMENTS (2)

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

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 5 ('What's the scope of the SA'). Also, more detailed messages from the Scoping Report - i.e. messages established through baseline review - are presented within Appendix III.
c) The environmental characteristics of areas likely to be significantly affected;	
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an 'SA framework'. The SA framework is presented within Chapter 4 ('What's the scope of the SA'). Also, messages from the context review are presented within Appendix III.</p> <p>With regards to explaining 'how... considerations have been taken into account' -</p> <ul style="list-style-type: none"> • Chapter 6 ('Reasons for selecting the alternatives dealt with') explains how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015 (or, indeed, was <i>not</i> refined) • Chapter 8 ('Reasons for selecting/developing the preferred approach') explains the how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. • Chapter 10 ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in Feb 2015.

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

APPENDIX III: CONTEXT AND BASELINE REVIEW

Introduction

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

What's the sustainability context?

Crime

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

Education

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

Health

- The NPPF calls for the setting strategic policies to ensure the provision of health facilities. In terms of the wider determinants of health, it notes that access to high quality open spaces and sport and recreation can make an important contribution.
- The 'Marmot Review' concluded that there is 'overwhelming evidence that health and environmental inequalities are inexorably linked'. The 'Haringey Health and Wellbeing Strategy 2012-2015' endorses the findings of the Marmot review in terms of the need to 'ensure social justice, health and sustainability are at the heart of all policies'.
- The report 'Ready for Ageing?' warns that society is underprepared for the ageing population. Meanwhile, the study 'Under the Weather' finds that heat related illness is liable to increase under climate change, but that this could be addressed through appropriate urban planning.
- At a local level, Haringey Council recently published for consultation a draft Corporate Plan, 'Building a Stronger Haringey Together'. One of the draft priorities is: "Empower all adults to live healthy, long and fulfilling lives."

Housing

- The NPPF requires that authorities meet the full, objectively assessed need for market and affordable housing wherever possible, including where housing market areas cross administrative boundaries. The NPPF also notes that:
 - Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'.
 - Good design is a key aspect in sustainable development.
 - Authorities should ensure provision of affordable housing
 - Larger developments are sometimes the best means of achieving new homes.

- Each of London's Boroughs are required to fulfil the housing targets as set out in the London Plan, and to address the suitability of housing development in terms of location, type of development, housing requirements and impact on the locality.
- 'Haringey's Housing Strategy 2009-19' sets out Haringey's approach to housing over the next ten years. It includes a vision to create 'neighbourhoods that people choose to live in with a balance of different types of homes which offer quality, affordability and sustainability for current and future generations'. In October 2014, the Council published for public consultation a new Housing Strategy 2015-2020.

Community cohesion

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

Accessibility

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

Economic growth

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

Skills and training

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

Economic inclusion

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

Town centres

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

Biodiversity

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

Townscape and cultural heritage

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

Open space

- The NPPF recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.
- The London Plan states that boroughs should plan for green infrastructure needs to realise the current and potential value of open space to communities and support the delivery of the widest range of linked environmental and social benefits.

- Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments.

Water resources

- The EU Water Framework Directive drives a catchment-based approach to water management. An Environment Agency strategy implements Directive in relation to groundwater, highlighting that groundwater is at risk from point source and diffuse pollution.
- The NPPF calls for planning authorities to produce strategic policies to deliver the infrastructure necessary for water supply and wastewater and to take account of the effects of climate change in the long term, including on water supply.
- The 'Water White Paper' notes that through measures to encourage and incentivise water efficiency (and demand management measures by water companies), the Government aspires to reduce average demand to 130 litres per head, per day by 2030.
- An Environment Agency strategy for restoring rivers in North London considers how rivers play a role in urban regeneration, providing a range of social and environmental benefits.

Soil and land quality

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

Flood risk and climate change

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

Air quality

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

Noise

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

Energy and carbon

- On energy, the European Commission recommends that the EU's energy efficiency improves by 20% and the share of renewable energy grows to 20% by 2020.
- The NPPF emphasises the key role for planning in securing radical reductions in GHG, including in terms of meeting the targets set out in the Climate Change Act 2008¹¹. Plan-making should, for example, support efforts to deliver infrastructure such as low-carbon district heating network and increase energy efficiency in the built environment
- The London Plan seeks to reduce London's carbon dioxide emissions of 60% (below 1990 levels) by 2025. Haringey Council has set an ambitious target to reduce borough-wide carbon emissions by 40% by 2020 from a 2005 baseline.

Waste management

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

Sustainable transport

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

What's the sustainability baseline?

Crime

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the Borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.
- There is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation.
- Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery
- There is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence

¹¹ In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020 against the 1990 baseline.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).
- The percentage of Haringey residents with no qualifications (8.6%) is not particularly high, but there are localised issues. In Tottenham Hale 22.45% of residents aged 16 and over have no qualifications.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.
- Although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment.
- As a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers. This issue has a greater impact on children from Black and other ethnic minority groups and children who are eligible for free school meals. Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small.
- Post-16 attainment in Haringey is improving but opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education.

Health

- Health and well-being in Haringey is very similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further.
- Health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the Borough. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.
- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese.
- Health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children.
- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).
- There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas.
- The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years to ensure essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives.
- Environmental issues are more concentrated in certain parts of the borough. For example, town centres are a particular focus for highway congestion and poor air quality. Some issues also impact more heavily in more deprived parts of the borough, with higher accident casualty rates in the East of the borough.

Housing

- Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The Borough has notable levels of homelessness, with 3000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the Borough (which is more densely populated than the west).
- At just £25,138 per annum, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average household income for London.
- The 2011 Census shows that the Borough; population was recorded as 254,926. This presents a significant change from the 2001 Census. The Borough has population density of 86.2 persons per hectare; well above the London average (52.0). The Borough's population is set to increase by 31,234 over the period 2011-2021.
- Housing need is high amongst certain groups of residents including those with the protected characteristics. For example, levels of homelessness are high amongst female lone parents.
- Homelessness is also high in the age group 16-24 and 25-44 compared to the expected profile from census data.
- Homelessness data indicates Black households approach as homeless at a level which is more than twice their representation in Haringey's population.
- Some protected groups also have high levels of housing need due to higher levels of vulnerability. Homeless acceptance due to mental or physical disability is higher than would be expected given the profile of disability in the 2011 census, indicating that disability may be a factor in causing homelessness for these groups of households.
- The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services.

Community Cohesion

- The 2011 Census showed that Haringey's population increased by 38,390 from 216,510 in 2001 to 254,900 in March 2011 (an 18% increase).
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. Nearly half the population comes from ethnic minority backgrounds.
- The proportion of older people is lower than the London average but is likely to place increasing pressure on health services in Haringey.
- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 13th most deprived local authority in England. There are particular pockets of deprivation such as in Tottenham Northumberland Park, Wood Green and Hornsey. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England.
- Compared to London, Haringey has a similar proportion of 0-19 year olds, a higher working age population and a lower proportion of older people. Those aged 25-29 and 30-34 form the two largest groups in the borough.
- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and around 200 languages are spoken. Our population is the fifth most ethnically diverse in the country.

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

Accessibility

- Education is highly accessible, with 100% of 5 to 10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and 100% of 16-19 year olds within 30 minutes of further education.
- Improved access to services and facilities is key to ensuring equality of opportunity. Certain groups may suffer particularly from reduced activity, for example those less able to travel due to mobility issues or low income.
- Analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough. For example, the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area.
- Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands

Economic growth

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

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles¹² (55.4%) across Haringey were higher than the London average (54.6) and significantly above the percentage for Great Britain of 44.5%. The percentage of the Borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The Borough is characterised by its polarised skills base. Around 21% of the Borough's working age population has a level 1 or below qualification. Meanwhile, 40% have a level 4 or above qualification.

Economic inclusion

- The total number of economically active in 2011 was 65.5% with 6.1% unemployed. This compares reasonably favourably with London, where 66.5% were economically active in 2011, with 8.4% unemployed.
- Tottenham has some of the highest levels of unemployment in London and the UK. In 2011, 63.7% of people aged 16-64 in Tottenham were in employment, below both the London and England rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64). This is significantly above the England and London rates.
- Labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities.

¹² Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

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

Town centres

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

Biodiversity

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

Townscape and cultural heritage

- The Boroughs historic assets include 467 listed buildings of Special Architectural or Historic Interest, six Grade I buildings and 434 Grade II buildings, 1150 locally listed Buildings of Merit, 29 Conservation Areas (some of which have had Character Appraisals¹³ completed), two Registered Parks and Gardens (Finsbury Park and Alexandra Park), 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. Also, the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Viewing Corridor.
- Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace.

Open space

- The Lee Valley presents a significant recreational waterway, which could serve to link Haringey with developments in East London, most notably the Olympic Park. The Lee Valley Regional Park is Haringey's single area of designated Green Belt and should continue to be protected. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land, and the All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- There is a need to improve accessibility to and quality of open spaces; explore opportunities for accessible open spaces within new development and the opportunities to link open spaces; and improve smaller open spaces and green areas.

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

- The Borough has an overall provision of 1.7 ha of open space per 1,000 of population. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward.
- Open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough.

Water resources

- Haringey is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment.
- The Moselle Brook and Stonebridge Brook is heavily modified. These Brooks are both tributaries of the Lower Lee River, classified as having 'poor' ecological status and failing to meet 'good ecological potential' under the Water Framework Directive.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area. Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- The Borough is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.
- The GLA¹⁴ estimate that buildings cover 24,000 hectares or 16% of Greater London. Crude calculations of the potential for green roofs in four areas of central London suggest that out of a surface area of 10 million m², 3.2 million m² had the potential to be greened. This would have a capacity to store in the region of 80,000m³ of rainwater at roof level, the equivalent to, approximately, the volume of water needed for 35 Olympic swimming pools.
- Haringey-specific data is not available for water consumption however at the London level¹⁵ the consumption for household water use is around 164 litres per head per day; around 20 litres per head per day higher than England and Wales. 74% of total water use is household use and 26% is non-household use.

Soil and land quality

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

Flood risk and climate change

- According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced. There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences would be significant.

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

¹⁵ Environment Agency (2013) State of the Environment Report for London [online] available at: <http://data.london.gov.uk/documents/SOE-2011-report.pdf> (accessed 10/14)

- Climate change effects increase the severity and frequency of the flood risk. The extent and frequency of surface water flooding would be increased across the borough. The standard of protection from river flooding is also reduced by climate change effects in some parts of the borough adjacent to the River Lea.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the Borough. Tottenham Hale is the most vulnerable ward, with more than 50% lying within Flood Zone 2.

Air quality

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

Noise

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

Energy and carbon

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

Waste management

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

Sustainable transport

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

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

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

- Community cohesion is an important broad issue, recognising that: almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with around 200 languages are spoken; and historically, Haringey has experienced a high level of population turnover. Estate renewal is an important consideration, and there are some inherent uncertainties; however, the appraisal of the draft plan ('Part 2' above) is able to conclude that: *"...with regards to estate renewal it is clear that the Council has responded to consultation responses and past appraisal findings, and amended the preferred approach accordingly in order to achieve the best outcomes."*
- Health is an important broad issue, recognising that: health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years); there is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. Perhaps the most notable effects of the Strategic Policies Partial Review relate to the increased growth quantum, and the spatial distribution that is supported. The result should be targeted regeneration, with a focus on town/district centres, which should help to increase uptake in active travel (walking and cycling) and enable investment in leisure and community facilities. Also, a new commitment to estate renewal and improvement has the potential to improve the quality of the dwelling stock.
- Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals); Children from Gypsy Rome and Irish Traveller backgrounds often have low levels of attainment in Haringey schools, although their numbers are quite small; and whilst post-16 attainment in Haringey is improving. Opportunities for high quality academic opportunities in the east of the borough and in the sub region are limited. However, the Strategic Policies Partial Review is set to have relatively little effect in this regard, as discussed under the 'education' heading within the appraisal of the draft plan ('Part 2' above).
- Crime is an important broad issue, recognising that: there is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation; young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery; and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence. As discussed under the 'crime' heading, as part of the appraisal of the draft plan ('Part 2' above), the Strategy Policies Partial Review is set to have limited effects, with more notable effects likely to result from the other emerging plans.

- Housing is an important broad issue, recognising that: housing need is high amongst certain groups of residents including those with the protected characteristics, e.g. levels of homelessness are high amongst female lone parents; black households approach as homeless at a level which is more than twice their representation in Haringey's population; some protected groups also have high levels of housing need due to higher levels of vulnerability, with homeless acceptance due to mental or physical disability higher than would be expected given the profile of disability in the 2011 census. The rate and pattern of housing development and population change will impact on wellbeing of new and existing residents and on the demand for services; and through the Strategic Policies Partial Review new housing is set to be focused on the east and centre of the borough where housing affordability and the quality of the existing dwelling stock is at its lowest. Importantly, there is a commitment to ensuring no loss of social housing floorspace through the estate renewal programme, and a commitment to rebalancing the supply of social housing, ensuring that the acute need for family housing is better addressed. Also, it is noted that supporting text commits to appointing an independent advisor who can advise residents on rights and options at all stages of the renewal process.
- Economic inclusion is an important broad issue, recognising that: labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics, e.g. the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities; and there is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. This is an important issue set to be addressed through all four plans, including the Strategic Policies DPD, recognising the support for redevelopment of some existing employment areas. Employment density will be increased in the vast majority of cases, and will be significantly increased overall (i.e. across the borough); however, the nature of jobs available within the borough is set to shift, and there is a risk of disproportionate effects.
- Environmental quality is an important broad issue, recognising that: the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with the protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality); environmental issues are more concentrated in certain parts of the borough, e.g. town centres are a particular focus for highway congestion and poor air quality, and there being higher accident casualty rates in the relatively deprived east of the borough; and open space is fairly evenly distributed across the borough but there is a lack of allotment space in the East of the borough. The Strategic Policies Partial Review supports an increased population density in Haringey, which could have negative implications for environmental quality; however, a carefully targeted approach is set to be put in place, with much emphasis on directing growth to areas of high PTAL and also to areas in need of regeneration (i.e. areas where there will be opportunities to increase urban realm quality).
- Accessibility is an important broad issue, recognising that: improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income); analysis has shown that access to certain services and facilities is unevenly distributed in certain parts of the borough, e.g. the NHS strategy identifies a deficiency of GPs in the south east of the borough, and a greater capacity requirement of practices in the north east Tottenham area. Further accessibility issues will arise with future population growth, especially around Tottenham Hale and Haringey Heartlands, however, this is only set to be addressed through the plans at the current time to a limited extent, as work on the Infrastructure Delivery Plan (IDP) is still on-going, and it is through this plan that provision will primarily be made. Having said this, it is suggested that the Strategic Policies Partial Review performs relatively well as focusing growth/change on Wood Green, the Seven Sisters Corridor, Tottenham and town centres is likely to lead to benefits. This strategy should help to improve access to town centre facilities and community infrastructure for existing and future residents.