



Sustainability Appraisal (SA) of the Tottenham AAP

SA Report

Published alongside the pre-submission version of the plan

November 2015



Revision schedule					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Nov 2015	SA Report published alongside the pre-submission version of the Tottenham Area Action Plan	Mark Fessey, Principal Consultant	Steve Smith, Technical director	Steve Smith, Technical director

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INTRODUCTION

1 BACKGROUND

1.1.1 AECOM (formally URS) is commissioned by London Borough of Haringey to undertake Sustainability Appraisal (SA) in support of the emerging Tottenham Area Action Plan (AAP) Development Plan Document (DPD); henceforth known as 'the Tottenham AAP'. Once adopted, the AAP will assist the delivery and implementation of significant development proposals for the Tottenham Hale Growth Area, the North Tottenham Growth Area and the Tottenham High Road Corridor and Seven Sisters Corridor Areas of Change.

1.1.2 SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, in terms of sustainability issues (including 'equalities' and 'health' 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 Tottenham AAP, 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 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 Area Action Plan (AAP) is being prepared in order to ensure that the scale of development and change proposed for Tottenham through 2026 and beyond is positively managed and guided by a planning framework. It aims to ensure that investment decisions meet the aspirations of the local community and the Council for the area as a whole, as well as specific places and locations within it.

3.1.2 The boundary of the AAP (see Figure 1.0) has been drawn to include the key neighbourhoods that have the capacity to accommodate growth i.e. those with developable strategic brownfield sites, existing transport connections, and maximise the benefits that come from regeneration. It recognises that sites identified sit within and alongside other sites and neighbourhoods that are not intended to be subject to the same level of change but will benefit from the targeted regeneration and proposals to improve physical connections, transport accessibility, employment creation and enhanced social infrastructure.

3.1.3 An AAP will provide clarity and certainty about how the opportunities for improving Tottenham's places will be realised, and the challenges addressed. Specifically, it will: prescribe a vision for how neighbourhoods areas can develop, allocate strategic sites for particular uses and types of development, and set out Tottenham specific policies aimed at ensuring new development is ambitious, appropriate and sustainable in a Tottenham context. It will alert infrastructure providers and public sector agencies to the growth targets and existing deficiencies present, so that they may schedule service and capacity upgrades accordingly. The Council's Infrastructure Delivery Plan will be used in conjunction with the AAP for this purpose.

3.1.4 More specifically, the objective of the Tottenham AAP is to help deliver:

- World class education and training
- A prosperous hub for business and local employment
- High quality public realm
- A different kind of housing market
- A fully connected place with even better transport links
- A strong and healthy community
- Enhancement of heritage assets

3.2 What's the plan not seeking to achieve?

3.2.1 The AAP is an aid to delivery and implementation of the priorities and proposals set out in London Plan and Strategic Policies DPD, and is therefore unable to change the overall location or scale of development at the higher strategic level. At the same time, the plan will be strategic in nature in that it will omit consideration of some detailed issues in the knowledge that these can be addressed further down the line (through the planning application process). The strategic nature of the plan is reflected in the scope of the SA.

4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

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

Consultation on the scope

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

4.1.3 As such, an SA Scoping Report was published for consultation in January 2014.⁷ In addition to consulting the statutory consultees, the consultation was widened to include all those organisations and individuals on the Council's consultation database. Subsequent to consultation the SA scope was updated.

4.2 Key issues / objectives

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

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

⁷ The Scoping Report is available at: <http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/tottenham-area-action-plans-aaps>

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?

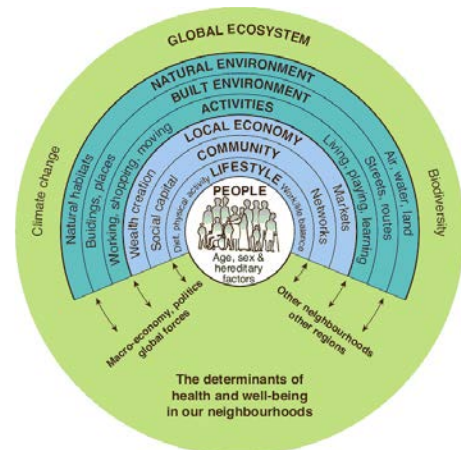
4.3 A note on ‘equalities’ and ‘health’ considerations

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

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

5.1.2 Systematic appraisal of (and consultation on) reasonable alternatives, in relation to these topics, is helpful as it equates to proactive plan-making, and is a means of ensuring that the final policy approach is sufficiently justified.

Reasons for focusing on these policy areas

5.1.3 These are the same issues that were the focus of alternatives appraisal within the Interim SA Report of February 2015, with the exception that 'Green Link' has been removed from the list. The Council received a number of consultation responses on the proposed Green Link, and in light of these has now determined a need to establish a policy focused on promoting the concept of the Green Grid through the plan (giving consideration to links through Tottenham to the Lee Valley). As such, there is no longer the same need to formally consider alternatives.

5.1.4 The five topics that are currently a focus of attention all offer an opportunity to explore policy alternatives, with a view to best addressing locally specific issues and contributing to delivery of Haringey's spatial strategy. It is not the case that the preferred policy approach in relation to any of the topics previously examined in February 2015 is now 'set in stone' to such an extent that it is no longer helpful to dwell on alternatives, nor is it the case that any further topics have emerged since February 2015 as necessitating alternatives appraisal.⁸ Other policy topics besides those listed above could *potentially* have been the focus of alternatives appraisal, but were not on the basis that it was unclear what value would be added. For many topics it is proportionate to develop a preferred policy approach on the basis of technical work and consultation, without formal alternatives appraisal. It is important to remember that:

- In many instances DM policy will closely reflect the policy direction set out by the Strategic Policies DPD (which was developed alongside a process of Sustainability Appraisal). Further, borough-wide policies in the emerging DM Policies DPD will apply to the Tottenham area, and this Plan will also be subject to SA, with alternatives appropriately considered.
- The preferred approach to site allocations in Tottenham has developed through an iterative process that has involved systematic screening of site options and workshops to determine which sites to include in the preferred 'site package' and what the broad preferred use / policy approach should be (given deliverability / viability considerations). Following site screening, it is not clear that there is significant scope for further consideration of 'reasonable alternatives' in relation to the sites that are allocated, particularly in light of sites needed to deliver the preferred spatial strategy for the Tottenham AAP.
 - See Part 1 of the Site Allocations DPD SA Report for a more detailed discussion of the methodology employed by the Council over 2013/14 when developing the preferred approach to site allocations.

⁸ Having said that no new issues have emerged as necessitating alternatives appraisal, it is recognised that a number of new policies have emerged and the Council has recognised the need to change emphasis in respect of several other policy areas. A number of new policy areas are set to be addressed through the plan with a view to repeating principles of relevant borough-wide DM policy, and adding a degree of local specificity. Other new policy areas deal with implementation. Also, 'Neighbourhood Area' policies are now being developed to provide context to the area-based site allocations in the AAP, with an emphasis on setting out principles for town centre uses / development in the neighbourhood areas.

Structure of this part of the SA Report

- 5.1.5 Each of the five policy areas listed above is assigned a chapter, below. Within each chapter, the following questions are answered:
- What are the reasons for selecting the alternatives dealt with?
 - What are the appraisal findings (in relation to the set of alternatives in question)?
 - What are the Council's reasons for selecting the preferred approach in-light of alternatives appraisal findings?

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

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

- 5.1.7 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.

6 SPATIAL STRATEGY

6.1 Introduction

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

6.2 Reasons for selecting the alternatives dealt with

6.2.1 Given the need to deliver a significant amount of housing in Haringey (a densely developed borough) over the plan period it is clear that options are somewhat limited. The adopted Strategic Policies established Tottenham Hale as a ‘growth area’, and Tottenham High Road and North Tottenham as ‘areas of change’; and it is now established - in light of updated evidence of capacity⁹ – that North Tottenham should sit alongside Tottenham Hale as a growth area.

6.2.2 However, it is nonetheless appropriate to give consideration to alternatives at the current time. Through initial discussions, the following options were discussed -

- Allocate more growth to the northern edge of Tottenham (north of Northumberland Park), where there is currently much land designated as SIL (Strategic Industrial Location), capitalising on synergies with the Enfield's planned transformative Central Leaside/Meridian Water mixed use development... with commensurately less growth to other areas.
- Allocate significantly more growth to Seven Sisters / Tottenham High Road area, given existing rail and tube links and the planned Crossrail 2 station... with commensurately less growth to other areas.

6.2.3 Subsequently, it was agreed that the first option is a reasonable alternative to the preferred strategy, whilst the second option is not.¹⁰

6.2.4 In summary, the reasonable alternatives are as follows –

Option 1 - Focus at the growth areas of Tottenham Hale and North Tottenham, with some growth also targeted at the ‘area of change’ of Tottenham High Road and the Seven Sisters Corridor (i.e. the Council's preferred option)

Option 2 - As per (1), but with some additional growth targeted at the northern edge of Tottenham, and commensurately less growth elsewhere.

6.2.5 These alternatives are very similar to those that were previously a focus of appraisal and consultation in February 2015.

⁹ Namely, the latest pan-London Strategic Housing Land Availability Assessment (GLA 2014).

¹⁰ Whilst the Seven Sisters / Tottenham Green area has significant transport infrastructure (existing or planned) and will play a part in delivering future growth, the area is also heavily constrained and is therefore unlikely to be a suitable location for accommodating a significant amount of additional growth. Constraints include: the historic environment (conservation areas, area of archaeological search, statutory listed buildings); and urban fabric and prevailing building heights which generally do not readily lend themselves to tall buildings. In addition, there are a limited number of available sites; and fragmented site ownership, which would require complex land assembly measures and challenge deliverability.

6.3 Summary appraisal findings

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

N.B. Appraisal findings have been updated since the February 2015 Interim SA Report.

Table 6.1: Summary appraisal findings: Spatial strategy

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Education	=	
Health	=	
Housing	2	★1
Community Cohesion	=	
Accessibility	★1	2
Economic Growth	★1	2
Economic Inclusion	★1	2
Town Centres	★1	2
Biodiversity	=	
Townscape and Cultural Heritage	=	
Open Space	=	
Soil and Land Quality	=	
Flood Risk and Climate Change	=	
Air Quality	=	
Energy and Carbon	=	
Sustainable Transport	=	

Relevant sustainability topics	Option 1	Option 2
<p>The alternatives perform similarly in terms of a range of objectives, with both options likely to ensure that regeneration opportunities are realised. Option 2 would involve an additional emphasis on growth in North Tottenham, which has merit in terms of some objectives (including housing, given that some land currently used solely for employment would likely become mixed use); however, there would be a risk that diverting growth to North Tottenham would compromise the achievement of regeneration objectives at Tottenham Hale. Also, Option 2 performs poorly in terms of economic growth and economic inclusion, given the likelihood of this option necessitating re-designating Strategic Industrial Land (SIL). Whilst plans for nearby Meridian Water demonstrate the benefits that can accrue through re-designating SIL, the North Tottenham context is not the same, and it is not clear that the potential for similar benefits exists.</p>		

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

6.3.2 The preferred option promotes a balanced approach to growth and development in Tottenham, in particular, a spatial scope that includes but also extends beyond North Tottenham. This option better reflects the Council’s strategic regeneration objectives for the wider area, addressing local character and responding to constraints which might inhibit development of mixed and balanced communities, and taking advantage of key public transport nodes and other existing and future planned infrastructure / investment. In addition, Option 2 would require the de-designation of strategic industrial land, which, as the appraisal indicates, is likely to have significant negative effects on economic sustainability objectives. The preferred option is therefore also better placed to accommodate the quantum of planned future growth without compromising local business and employment opportunities, which are integral to Tottenham’s sustainable development. A number of Regulation 18 stage consultation comments expressed concern with provision of employment land, in particular, the loss of businesses and employment opportunities. A new AAP policy NT2 reinforces the spatial strategy and objective to protect SIL in North East Tottenham.

7 EMPLOYMENT SITES

7.1 Introduction

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

7.2 Reasons for selecting the alternatives dealt with

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

7.2.2 The following alternatives have been appraised:

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

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

7.2.3 These alternatives were previously a focus of appraisal and consultation in February 2015.

7.3 Summary appraisal findings

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

Relevant sustainability topics	Option 1	Option 2
Crime	★1	2
Housing	=	
Community Cohesion	=	
Economic Growth	★1	2
Economic Inclusion	★1	2
Noise	=	

Summary

Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents.

N.B. Appraisal findings here are the same as under the heading of ‘Employment 2’ within the DM Policies DPD Interim SA Report, i.e. it is not suggested that the Tottenham context has a bearing on the appraisal of alternatives in relation to cross-subsidy requirements when redeveloping existing employment sites.

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

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

8 TOWN CENTRE HIERARCHY

8.1 Introduction

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

8.2 Reasons for selecting the alternatives dealt with

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

8.2.2 The following alternatives have been appraised:

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

Option 2 - Retain / reinforce existing town centre hierarchy.

8.3 Summary appraisal findings

8.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference. Also, ' = ' is used to denote instances where the alternatives perform roughly on a par.

Table 8.1: Summary appraisal findings: Town centre hierarchy

Relevant sustainability topics	Option 1	Option 2
Community Cohesion	★1	2
Accessibility	★1	2
Economic Growth	★1	2
Town Centres	★1	2
Townscape and Cultural Heritage	★1	2
Open Space	★1	2
Flood Risk and Climate Change	2	★1
Sustainable Transport	★1	2
<p><u>Summary</u></p> <p>Option 1 would lead to a range of positive effects, including significant positive effects on: economic growth, town centres and townscape, including by promoting a new district centre at Tottenham Hale to support large scale residential-led regeneration. Development of the district centre will also have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area. However, it is noted that Tottenham Hale lies within the floodplain of the River Lee complex and is zoned as high flood risk (Zone 3), with the rest of the borough at little or no risk (Zone 1). Development of the Tottenham Hale district centre will need to have regard to the flood risk, but it is considered that this can be addressed through establishing requirements for flood resilience and resistance measures.</p>		

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

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

9 BUILDING HEIGHTS

9.1 Introduction

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

9.2 Reasons for selecting the alternatives dealt with

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

9.2.2 The following alternatives have been appraised:

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

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

9.3 Summary appraisal findings

9.3.1 The table below presents summary appraisal findings. Detailed appraisal findings can be found within **Appendix VIII**. The methodology in detail in the appendix, but in summary: Within each row (i.e. for each sustainable topic) the columns to the right hand side seek to both categorise the performance of each scenario in terms of 'significant effects (using red / green shading) and also rank the alternatives in order of preference. Also, '=' is used to denote instances where the alternatives perform roughly on a par.

Table 9.1: Summary appraisal findings: Building heights

Relevant sustainability topics	Option 1	Option 2
Housing	=	
Economic Growth	=	
Town Centres	★ 1	2
Townscape and Cultural Heritage	★ 1	2
Sustainable Transport	★ 1	2

Summary

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

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

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

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

10 AFFORDABLE HOUSING

10.1 Introduction

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

10.2 Reasons for selecting the alternatives dealt with

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

10.2.2 The following alternatives have been appraised:

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

Option 2 - Seek to meet the borough-wide target of 40% affordable housing provision and apply an affordable housing tenure split at 40% intermediate and 60% social/affordable rented (as per the proposed alterations to Strategic Policy SP2 and policy DM13 of the emerging Development Management Policies).

10.3 Summary appraisal findings

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

Table 10.1: Summary appraisal findings: Affordable housing

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

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

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

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

11 INTRODUCTION (TO PART 2)

11.1.1 This part of the report presents an appraisal of the Tottenham AAP as it currently stands, i.e. as presented within the current ‘proposed submission’ document.

12 APPRAISAL OF THE DRAFT PLAN

12.1.1 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.

12.2 Methodology

12.2.1 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

12.2.2 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.

12.2.3 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.

12.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.¹¹ 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.

12.3 Crime

12.3.1 Crime rates are relatively high across the borough and crime is particularly prevalent in Northumberland Park. There is a need to design schemes in order to reduce levels of crime, fear of crime and anti-social behaviour. Since unemployment is strongly correlated with acquisitive crime, there may also be a link to wider economic development.

¹¹ Environmental Assessment of Plans and Programmes Regulations 2004

- 12.3.2 There are no references to crime in the **overarching policies**, although it is recognised that housing and economic policies aim to support a very significant level of regeneration in the area. This could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. **AAP 06** includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.
- 12.3.3 There are no references to crime in the **neighbourhood area sections**; however they do set out key objectives which include considerations for safe and accessible environments. Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. Crime is particularly high in Northumberland Park and Tottenham Hale, hence this issue might be explicitly addressed in these sections; however, it is recognised that the DM Policies DPD includes Borough wide requirements in this regard. Also, AAP 06 sets out the Council's commitment to preparing Design Code Supplementary Planning Documents (SPDs) for Tottenham's Growth Areas, where opportunities for secure by design principles can be investigated.
- 12.3.4 In **conclusion**, the plan is likely to result in positive effects on the crime baseline if there is large scale regeneration (including jobs growth) and robust implementation of safer streets and other measures to design out crime in Tottenham, including particularly in Northumberland Park where crime levels are highest. However the significance of this effect is uncertain.

12.4 Education

- 12.4.1 There is a need to increase participation and attainment in education for all, not least by improving the provision of and access to education and training facilities. School attainment in the area is significantly below the London average, with children and young people who live in the more deprived areas of Haringey tending to have a lower level of achievement than those from more affluent backgrounds. As the population grows more school spaces will need to be created.
- 12.4.2 Part of the **spatial vision** for Haringey is that "new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough". Education and training are specifically addressed in the **AAP 11** dealing with infrastructure requirements and by **AAP 04** with its support for training.
- 12.4.3 The emerging DM Policies DPD sets out a policy on the use of planning obligations to secure access to jobs and training, including apprenticeships and work experience placements. As per a **recommendation** within the Interim SA Report (February 2015), the Council has introduced more locally specific requirements in the AAP, including site specific requirements for facilities, to strengthen performance against the education objective.
- 12.4.4 With regards to **neighbourhood areas**, it is noted that:
- The Tottenham Hale section includes an objective to designate sites for significantly improved community facilities including a new all form entry school
 - The North Tottenham section highlights the need for enhanced education facilities commensurate with the growth in forecast population and identifies a site for a learning and education hub
 - Tottenham Green neighbourhood area already has important cultural and education provision and this section identifies a site for new 'employment/education uses' as well as opportunities for education events on Tottenham Green.
- 12.4.5 A **site allocation** is made for the expansion (underway) of the Harris Academy in Tottenham Hale, and increased provision as part of the Northumberland Park Masterplanning area, to meet need in these growth areas.

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

12.5 Health

12.5.1 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. Large numbers of hot food takeaways in parts of Tottenham are identified as having a potential negative impact on health and wellbeing. Access to GPs is significantly poorer than in other parts of Haringey and the level of planned growth in Tottenham means a need for development of more health infrastructure.

12.5.2 A **strategic objective** of the AAP is to provide 'a strong and healthy community' through measures such as improved health care provision, the creation of a green grid, and increasing the supply of energy-efficient homes. **AAP 01** picks up on this theme by requiring that development proposals demonstrate how they have proactively responded to the vision and regeneration objectives for Tottenham, including to improve the quality and supply of housing to meet housing needs and improve health and wellbeing.

12.5.3 With regard to **neighbourhood areas**, the North Tottenham neighbourhood area section highlights the need for new and enhanced health facilities and identifies sites for such provision. The Tottenham Hale section includes an objective to designate sites for improved community facilities including a new large GP surgery of 1500-2000 sqm in size.

12.5.4 **In conclusion**, the plan is likely to result in **significant positive effects** on the health baseline as a result of the strong emphasis on increasing and improving primary care provision as well as attention to wider determinants of health such as improved access to open space and encouragement of active travel. Such positive effects will be reinforced through implementation of policies in the DM Policies DPD, for example the policy controlling hot food takeaway locations. However, there is some uncertainty. Careful monitoring and coordinated planning will be required to ensure that sufficient new infrastructure is brought forward in a timely manner to support the significant level of residential development planned for. Health service and sports facilities should be located at sites highly accessible by walking, cycling and public transport wherever possible.

12.6 Housing

12.6.1 There is a need to provide greater choice, quality, quantity and diversity of housing across all tenures to meet the needs of residents. This includes refurbishing existing stock (many existing homes do not meet required standards of decency) as well as developing new supply. The aim is to create more mixed communities that have a balance of different types of housing which offer quality, affordability and sustainability (Haringey's Housing Strategy 2009-19).

12.6.2 Affordability of housing is a significant issue in the area. Over 60% of all social housing in the borough is located in the Tottenham wards and 36.9% of the population in Tottenham live in this housing. High levels of homelessness and overcrowding are also key issues.

12.6.3 The AAP aims to deliver 10,000 new homes over the period to 2026, including through the designation of Tottenham as a Housing Zone. A **strategic objective** is to create a different kind of housing market with a range of high quality housing at a range of prices and tenures.

- 12.6.4 With regard to **overarching policies**, the policy **AAP 03** requires development proposals to demonstrate how they have improved the quality and supply of housing to meet housing needs. The housing policy repeats the 10,000 homes target and the aim of contributing to mixed and balanced communities. It clarifies requirements with regards to affordable housing, densities and viability. Policy **AAP 01** also sets out that proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes as well as to create mixed and balanced communities.
- 12.6.5 All of the **neighbourhood areas** involve residential development. The neighbourhood area sections highlight indicative capacities for the number of homes to be provided on key sites as well as specific design requirements.
- 12.6.6 **In conclusion**, the plan is likely to result in **significant positive effects** on the housing baseline. In particular, the delivery of large scale growth in housing and the strong emphasis on affordability and diversity of housing to meet local needs will contribute to these effects. However, there are some uncertainties. Large scale regeneration will likely positively transform the area over time as housing quality and the wider environment is improved. Whilst the Plan's housing policies aim to create more stable, mixed and balanced neighbourhoods over the long term, development consistent with the plan policies may bring some disruption to existing communities. The council should consider how impacts of area regeneration can be monitored and where necessary mitigated.

12.7 Community cohesion

- 12.7.1 Tottenham is one of the most ethnically diverse areas in the country. Over three quarters (78.9%) of the population have non White British ethnic group, compared to 55.1% for London. There are some 200 different languages spoken in Tottenham. The Haringey 'Sustainable Community Strategy 2007-2016' sets out an ambition to achieve an open and inclusive Borough, including through the provision of affordable housing, and the construction of mixed and sustainable communities.
- 12.7.2 The level of regeneration proposed, supported by the **overarching regeneration and housing policies** amongst others, should help to make the area a more attractive place to live with more stable and connected communities and better access to high quality public spaces, thus contributing further to community cohesion. However, this level of growth and change may bring some disruption to existing communities, for example where re-housing is needed to allow for refurbishment or re-provision, or where private housing rents become an issue for some residents. Such disruption will need to be managed sensitively to ensure that existing social capital is not undermined. It is noted that policy **AAP 01** sets out requirements for site masterplanning to ensure that development meets the wider objectives of the Plan. The supporting text provides that masterplans for some types of proposals, including estate renewal projects, will need to be coordinated and consultation led.
- 12.7.3 **In conclusion**, the plan is likely to result in **significant positive effects** on the community cohesion baseline, assuming that the housing policy in particular is successful at creating more mixed and balanced communities. However, there are some uncertainties. As noted above the level of regeneration being planned for in Tottenham could bring disruption to existing communities while the area undergoes transformation. This will need to be managed sensitively to ensure that existing social capital is not undermined. The AAP could consider making reference to such issues.

12.8 Accessibility

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

- 12.8.2 The Tottenham Hale District Centre **neighbourhood area policy** should improve accessibility for people living in this area to a range of services and amenities. The Green Grid policy **AAP 09** should also improve accessibility for those living near it, as well as access to the Borough's network of green and open spaces.
- 12.8.3 Policy **AAP 01** may help to support more integrated development through requirements for such comprehensive and coordinated development. However, there may be the potential to go further. Accessibility could be supported by requiring, where practicable, that local facilities are clustered together so that the services required by the community - including health infrastructure, education provision, libraries and community spaces - are provided within accessible locations. In this manner different facilities can complement each other, integrate with the function of each neighbourhood area and utilise the space required for this provision efficiently.
- 12.8.4 Policy **AAP 07** includes a range of requirements to ensure that strategic transport infrastructure is appropriately integrated into the Tottenham Area, and that new development achieves improvements in public transport accessibility, particularly to encourage modal shift and more sustainable movements. This is likely to have beneficial effects on access to local employment opportunities, services and community facilities.
- 12.8.5 With regard to **neighbourhood areas**, the development of a new district centre in Tottenham Hale providing a range of local facilities (e.g. a large GP clinic and a new school) should significantly improve access to essential services and amenities for people living in this part of Tottenham. All of the neighbourhood area sections include references to improving accessibility. For example the North Tottenham section refers to the creation of a new access bridge to the Lee Valley Park and improved east-west connections; and the Tottenham Hale section refers to improved links to the Lee Valley Park.
- 12.8.6 **In conclusion**, the plan is likely to result in **significant positive effects** on the accessibility baseline due to significant coverage of accessibility, particularly in the neighbourhood area sections. The level of regeneration proposed, including the new district centre at Tottenham Hale, provide big opportunities that must be capitalised upon. However, there are some uncertainties. It is vital that social infrastructure keeps pace with housing and population growth in the biggest growth areas, Tottenham Hale and Northumberland Park.

12.9 Economic growth

- 12.9.1 Issues relate to securing sustainable economic growth and business development, through increasing and diversifying employment opportunities, meeting the needs of different sectors of the economy and facilitating new land and business development. When it is compared with the rest of London, Haringey has levels of economic growth that are below the average, a higher rate of unemployment and lower gross weekly pay per capita. However it also has the highest start-up of new businesses in London; the economy is dominated by small businesses - 90% of businesses employ 10 or less people. Evidence suggests that employment growth within Tottenham will come primarily from small and medium sized B1 businesses, the creative sector, and retail and leisure opportunities unlocked by the area's regeneration plans.
- 12.9.2 While many of the **overarching policies** relate to the broader regeneration of Tottenham, the policy that most explicitly contributes to economic growth is **AAP 04** which sets out requirements to assist in facilitating the regeneration and renewal of Tottenham's designated employment areas. Specifically, it seeks a reconfiguration of the local employment offer in order to intensify land uses, maximise the amount of business floorspaces and premises and to increase the number and variety of jobs. The policy supports enabling mixed use schemes on selected sites where viability issues inhibit employment development, as well as a future role for Tottenham Hale as a destination for higher value, purpose built office development.

12.9.3 As all of the **neighbourhood area** sections seek to coordinate and facilitate development and provide clarity to developers it is considered that all of these sections contribute to supporting economic growth in the area. Significant flexibility is provided to enable developers to create viable schemes consistent with the Plan objectives

12.9.4 **In conclusion**, the plan is likely to result in **significant positive effects** on economic growth due to the large scale residential and employment led regeneration proposed in the AAP area by this plan. While there is some risk that there could be a loss of employment floorspace to new mixed use development, this is set to be managed and mitigated by the DM Policies DPD which makes clear that the Council will seek new development achieves the maximum amount of employment generating floorspace possible.

12.10 Skills and training

12.10.1 More Haringey employment than the London norm is with small firms often in the form of local retailers; this limits opportunities for employee training and progression within local firms. Evidence from providers active in the area suggest ongoing pressing demand for training in ESOL, literacy, numeracy and ICT, and flows of people into employment once these skills barriers are addressed.

12.10.2 Part of the **spatial vision** for Haringey is that “new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough”. There is a strategic objective in the AAP to provide “world class training and education”. Skills and training are addressed in the **overarching AAP policies**, including **AAP 11** dealing with infrastructure requirements and **AAP 04** with its support for planning contributions for training. It should be noted that these issues are also picked up in the DM Policies DPD, for example, where policies seek planning contributions to facilitate opportunities for local training, including apprenticeships.

12.10.3 There are no explicit references to skills and training in the **neighbourhood area** sections although some areas identify sites for schools and other community infrastructure, and there may be potential to use these for skills training for the wider community.

12.10.4 **In conclusion**, the plan is likely to result in positive effects on skills and training particularly through facilitating more new development in the area that will be required to make financial contributions to, amongst other things, fund local training. The significant amount of construction work will also create opportunities for on-site training and apprenticeships. These effects are not considered to be significant, and positive effects could be enhanced by setting out more specific requirements for the development of relevant training facilities.

12.11 Economic inclusion

12.11.1 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.

12.11.2 Tottenham is expected to meet the provision for the bulk of the London Plan’s forecast growth of 12,000 new jobs in the Borough by 2026. The AAP policies including **AAP 04** set a basis for ensuring that this job growth can be facilitated and appropriately accommodated within the area. The scale of employment growth should help to increase local access to jobs, however the extent of this access will depend, in part, on whether the employment offer is compatible with residents’ skill sets.

12.11.3 One of the Plan's strategic objectives is 'a prosperous hub for business and local employment' and seeks better access to job opportunities for Tottenham's communities. There are no explicit references to economic inclusion in the **overarching policies** but accessibility to jobs in and around Tottenham should be supported by the safeguarding and intensification of employment sites, designation of a new district centre at Tottenham Hale along with its future role for office development, and the large scale regeneration and access improvements proposed. It is noted that the matter of economic inclusion is covered in the Borough-wide policies of the adopted Strategic Policies and emerging DM Policies DPD.

12.11.4 **In conclusion**, the plan is likely to result in positive effects on economic inclusion, however the scale and significance of these effects is uncertain at this stage. This is because it is difficult to predict whether large scale residential-led regeneration of the area may lead to the loss or displacement of some local businesses (either directly or indirectly as a result of increasing rents), and if accessibility to some types of existing jobs (e.g. lower skilled jobs) could therefore be reduced.

12.12 Town centres

12.12.1 Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The scale of the High Road has to a large part been an obstacle to creating a cohesive and distinctive High Street experience, and the economic down turn has stunted the ability of many of these centres to fulfil their function effectively. There is a need to enhance the environmental quality of town centres (including quality of buildings and public realm), ensuring they are easily accessible and meet local needs and promoting them.

12.12.2 The spatial strategy for the AAP sets how Tottenham's centres will contribute to supporting growth and regeneration in Tottenham over the plan period. The AAP recognises, and sets out policies to ensure, that the area's town centres retain their distinctiveness and offer so as to complement and not compete with each other.

12.12.3 The **neighbourhood area sections** also touch on town centre development (e.g. improvements at Bruce Grove to consolidate and strengthen its role as the retail heart of the High Road) but the Tottenham Hale section is most significant as it highlights the intent to create a new district centre. Along new streets a range of retail, leisure or community facilities in small scale units at ground floor level will be sought. **AAP 08** is also noteworthy in its recognition of the need to appropriately manage town centre uses along the Tottenham High Road, which positively responds to the need to support the existing town centre hierarchy.

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

12.13 Biodiversity

- 12.13.1 The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem. This area is home to European designated sites and is a Site of Special Scientific Interest. The River Lee Navigation and Pyre's Brook waterways also offer a habitat for wildlife. There are no designated Sites of Importance for Nature Conservation in Tottenham and much of the area generally lacks access to the natural environment.
- 12.13.2 None of the **overarching policies** refer to biodiversity explicitly, but the Green Grid policy **AAP 09** seeks to support the creation of a new axial link between Tottenham High Road and Lee Valley Park. This link will include high quality landscaping and is envisaged as a bold green infrastructure investment; thus it is assumed this could create some biodiversity value.
- 12.13.3 With regard to **neighbourhood areas**, the Tottenham Hale section proposes creating an improved pedestrian and cycle link to the Lee Valley Park and refers to development of the Green Grid (see above). This section also includes a riverside site where development is required to ecological interests. The North Tottenham section include requirements for new and enhanced public spaces including a large new community park; the latter could potentially create significant new biodiversity value if designed and managed for this objective. The Seven Sisters section notes where planning contributions will be sought to improve the quality and utility of the green spaces near to the site (the text also reaffirms the need to preserve and enhance the SINC and green corridor) and where the Green Grid should be facilitated.
- 12.13.4 **In conclusion**, the impact of the plan on biodiversity is unclear at this stage. An expanding population and new development is likely to be place increasing pressure on existing green spaces and biodiversity. Increased use of the Lee Valley Park as a result of improved access could have negative impacts for the biodiversity there if use cannot be properly managed. Potential positive effects include the formalisation of a Green Grid with improved links to the Lee Valley Park and other open spaces across Tottenham, and development and enhancement of some pocket parks. However the design of the former (and thus its value for biodiversity) is not clear entirely clear and effects will ultimately depend on how it is delivered. The delivery of more green space does not appear to form a prominent part of policies or many site allocations at this stage; however, it is recognised that the Strategic Policies and DM Policies DPD reflect a view that policy should primarily seek to deliver improvements to the quality and accessibility of existing spaces. The plan could be strengthened by including a more robust approach to securing the provision of green space, trees and vegetation as part of new development although it is acknowledged that the DM Policies DPD set requirements in this regard. It will be important to ensure that the pressure to meet housing delivery targets and deliver more employment floorspace is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around increasing provision of, and quality of, small parks and amenity green spaces and securing new open space as part of new development in the Tottenham area.

12.14 Townscape and cultural Heritage

- 12.14.1 Tottenham has nine Conservation Areas and includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas. The North Tottenham Conservation Area is identified on English Heritage's Heritage at Risk Register as a conservation area at risk. Key issues relate to preserving or where possible enhancing buildings and areas of architectural and historic interest.
- 12.14.2 There are several policies dealing with townscape/cultural heritage in the **overarching policies** including **AAP 05** (Conservation and Heritage), **AAP 06** (Urban Design and Character including Tall Buildings) and **AAP 08** (Tottenham High Road). These policies are also addressed in the DM Policies DPD. In light of consultation feedback and Interim SA findings, the AAP has been revised to highlight the context and specific opportunities for conserving and enhancing the historic environment, including heritage led regeneration, building on the policy proposed in the DM Policies DPD.

- 12.14.3 The **neighbourhood area section** and site allocations have been updated to set out key features of local character, including issues and opportunities in respect of townscape and cultural heritage which new development must positively respond to. Examples include reference in the Seven Sisters and Tottenham Green section to a need for targeted building and shop front/signage improvements consistent with the enhancement of the character, heritage and townscape attributes of the area; and reference in the Bruce Grove section to seeking limited growth consistent with the existing scale and character of the Conservation Area and town centre.
- 12.14.4 **In conclusion**, the impact of the plan on townscape and cultural heritage is likely to be significant. A considerable amount of work has gone into developing a targeted approach in light of consultation responses received; however, there remains some uncertainty and hence it is not possible to conclude significant positive effects. The scale of regeneration proposed will need to be carefully managed to ensure that existing assets and conservation areas are treated sensitively in all proposals. It is acknowledged that the DM Policies DPD sets out the Borough-wide approach for the conservation of heritage assets consistent with their significance, with additional requirements included in AAP 05.
- 12.15 Open space**
- 12.15.1 There is a need to deliver a network of high quality, accessible open spaces across Tottenham. Tottenham has a severe problem with a lack of accessibility to the wider natural environment. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is a significant problem.
- 12.15.2 The AAP includes an aim to create an interconnected Green Grid to link Tottenham's network of open space, which is set out in the **overarching policies**. The Green Grid policy **AAP 09** seeks to support the creation of a new axial links between Tottenham High Road and Lee Valley Park. This will include high quality landscaping and is envisaged as a bold green infrastructure investment.
- 12.15.3 With regard to **neighbourhood areas**, the Tottenham Hale section proposes creating an improved pedestrian and cycle link to the Lee Valley Park and refers to development of the Green Grid (see above). The North Tottenham section includes requirements for new and enhanced public spaces including a large new community park. The Seven Sisters section notes where planning contributions will be sought to improve the quality and utility of the green spaces near to the site and one site where a new or improved route should be facilitated.
- 12.15.4 **In conclusion**, potential positive effects include the formalisation of a Green Grid with improved links to the Lee Valley Park and other open spaces across Tottenham, and development and enhancement of some pocket parks. However the design of the former is not entirely clear at this stage and effects will ultimately depend on how it is delivered. The delivery of more open space does not appear to form a prominent part of policies or many site allocations at this stage, however it is recognised that opportunities for new open space are limited and hence there is primarily a need to deliver improvements to the quality and accessibility of existing spaces. It will be important to ensure that the pressure to meet growth targets is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around improving access to small parks and amenity green spaces and securing new open space as part of new development in North Tottenham. Robust implementation of the proposed open space policy in the DM Policies DPD should help to manage and mitigate this risk. However, the plan could be strengthened by having a more robust approach to securing new open spaces as part of new development.

12.16 Water resources

- 12.16.1 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).
- 12.16.2 There are no explicit references to water resources in the **overarching policies** but it is clear that the substantial growth in population and business planned for in Tottenham will place greater demands on water supply and waste water infrastructure.
- 12.16.3 With regard to **neighbourhood areas**, development of the Green Grid will greatly improve access from Tottenham Hale to the open spaces and waterways of the Lee Valley Park. The Hale Wharf site, which provides access to the waterways, will be an important site. The need to ensure that development close to waterways helps to protect and where possible enhance water quality (e.g. through provision of sustainable drainage measures that cleanse water runoff) would be a useful addition. Opportunities to deculvert and improve the ecological value of waterways should also be taken.
- 12.16.4 One **site allocation** in the Seven Sisters section refers to the need to consult Thames Water *“with regards the capacity of existing drains to move waste water from the site. Provision for safe and secure waste water drainage will be required to be identified prior to development commencing, and this will be a condition on planning consents.”* Also, as per a **recommendation** made within the Interim SA Report (February 2015), the site allocations have been amended where relevant to note opportunities where deculverting should be investigated in order to improve the ecological value of waterways and flood risk management. Allocations also identify where sites fall within Source Protection Zones, where there is a particular need to ensure development does not adversely impact on water quality.
- 12.16.5 **In conclusion**, the plan is likely to result in increased consumption of water resources (relative to the existing situation) due to increases in water demand and potentially also increased risks to ground and surface water quality from development. However the effect relative to the baseline of ‘no plan’ is likely to be insignificant as both would involve high levels of growth in the area (this being driven by London Plan targets) and the Borough-wide DM Policies DPD include requirements for managing water resources. It is noted that the Council has been consulting with Thames Water regarding the issue of water supply and waste water infrastructure. It is understood that there is no suggestion that the total amount of development proposed in the Local Plan cannot be accommodated within existing provision, but there is recognition that the provision of new mains connections could take some time to implement. The Council will work with Thames Water in updating Haringey’s Infrastructure Delivery Plan.

12.17 Soil and land quality

- 12.17.1 The majority of development proposed in Tottenham is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Tottenham which may need to be remediated before development.
- 12.17.2 There are no explicit references to these issues in the **overarching policies**, but it is clear that the majority of development proposed in Tottenham is on brownfield land. The need to address risks from land contamination is highlighted in the DM Policies DPD.
- 12.17.3 A number of site allocations in different **neighbourhood areas** highlight the need for studies to be undertaken to understand what potential contamination there is on this site prior to any development taking place.
- 12.17.4 **In conclusion**, the plan is likely to result in positive effects on the land baseline in terms of encouraging the effective use of land through the development and remediation (where required) of brownfield land. However the effect is not considered significant as the plan contains few strong provisions.

12.18 Flood Risk and climate change

- 12.18.1 The main source of flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. Tottenham Hale has more than 50% of the ward lying within Flood Zone 2.
- 12.18.2 There are no explicit references to flood risk issues in the **overarching policies** but this is understandable given that the Development Management Policies sets out key principles and clear requirements in relation to this issue.
- 12.18.3 In the **neighbourhood areas** section the site allocations, where relevant, highlight the need to consider flood risk (e.g. sites SS2 and NT2 are in Critical Drainage Areas and site TH1 is in flood zone 2) and, where appropriate, to submit a Flood Risk Assessment.
- 12.18.4 **In conclusion**, the plan could have negative effects on flood risk without appropriate management and mitigation. This is because high levels of development are proposed for Tottenham Hale, much of which is in flood zone 2. Consequently new development in the area could exacerbate flood risk (to occupiers and/or to other buildings) by being in the flood zone as well as by increasing the risk of surface water and sewer flooding (by reducing the permeability of the ground and adding to the pressure on the combined sewers during heavy rainfall events). Also some other development sites are in critical drainage areas for surface water flooding. However management and mitigation of these potential negative effects should be provided by the Borough-wide flood risk management policies in the DM Policies DPD which will apply equally to the Tottenham area.

12.19 Air quality

- 12.19.1 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.
- 12.19.2 There are no explicit references to air quality issues in the **overarching policies**; however **AAP 07** seeks to support more sustainable transport movement in Tottenham and the Borough, in part, to improve the health and well-being of Haringey's residents. The policy responds to issues raised in the Interim SA, which noted that poor air quality is primarily linked to traffic congestion and that the council should consider highlighting the need to facilitate public transport accessibility and encourage walking and cycling as part of the AAP policy.
- 12.19.3 Multiple site allocations in the **neighbourhood areas** (e.g. Seven Sisters sites SS1-SS7) refer to the need to improve local air quality on site.
- 12.19.4 **In conclusion**, the impact of the plan on air quality is likely to be limited as there are few requirements relating to this issue in the AAP. Improvements in public transport accessibility as part of wider regeneration could reduce traffic-related transport emissions per capita (albeit net emissions may increase over the plan period as these gains are offset as the new development planned for in the area brings a growing population all of whom will presumably need to travel). The council should consider measures such as provision of street trees and electric car charging points could also be encouraged to further improve air quality. This would usefully extend the broad air quality policy references included in the DM Policies DPD.

12.20 Noise

- 12.20.1 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 for this issue.
- 12.20.2 There are no explicit references to noise issues in the **overarching policies**. However the shift from B2/B8 to B1 on some employment land sites as part of planned regeneration could reduce noise emissions and thus have benefits for any nearby housing.

12.20.3 Multiple site allocations in the **neighbourhood areas** (e.g. Seven Sisters sites SS1-SS7) refer to the need to reduce noise pollution on site.

12.20.4 **In conclusion**, the impact of the plan on noise relative to the baseline of 'no plan' is considered to be intangible given the limited coverage of this issue in the AAP. It is recognised that the DM Policies DPD sets Borough-wide policies to ensure potential sources of noise pollution are managed and appropriately mitigated, as well as ensuring the protection of amenity for building occupiers.

12.21 Energy and carbon

12.21.1 There is a need to minimise energy use and increase energy efficiency and use of renewable energy. There are considerable opportunities, given that Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in Tottenham Hale and other areas.

12.21.2 The AAP includes an emphasis on delivering energy efficient homes, including the aspiration for a decentralised energy network. **AAP 01** highlights the need to reduce carbon emissions and adapt to climate change.

12.21.3 With regard to **neighbourhood areas**, the Tottenham Hale policy states that sites within Tottenham Hale should facilitate connection to the decentralised energy network or provide part of the site as easement for the network.

12.21.4 Multiple **site allocations** are identified as being in an area with potential for being part of a decentralised energy network. For each site the AAP states that the role they play in the network could include providing an energy centre, being a customer or providing an easement for the network.

12.21.5 **In conclusion**, the impact of the plan on energy and carbon emissions relative to a baseline of 'no plan' is likely to be positive. This is because the development of a decentralised energy network, potentially connecting to the network under development in neighbouring Enfield, would provide a low carbon source of heat for new and existing buildings, helping to reduce carbon emissions per capita. However the effect is not considered to be significant as the DM Policies DPD is viewed as the key driver of decentralised energy development. The support that the AAP provides to development of decentralised energy could be strengthened by developing an area specific policy on decentralised energy that clearly allocates sites for energy centres and identifies network routes.

12.22 Waste management

12.22.1 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.

12.22.2 There are no explicit references to these issues in the **overarching policies**. This issue appears to have been left to the Strategic Policies (SP6), DM Policies DPD and the forthcoming North London Waste Plan.

12.22.3 With regard to **neighbourhood areas**, site allocation NT2 refers to an existing waste management facility and the need to provide an additional compensatory site if this were developed for a non-waste use.

12.22.4 **In conclusion**, the AAP is unlikely to have a significant effect in terms of waste management, and it is noted that the Strategic Policies (SP6) and DM Policies DPD includes policies on waste management and new waste facilities.

12.23 Sustainable transport

- 12.23.1 Tottenham has some of north London's best transport links with the Victoria line and rail services to Stratford, the City, Stansted Airport and Cambridge. Further investment in transport connectivity through Crossrail 2 (to be confirmed) and a major redevelopment of Tottenham Hale Tube, rail and bus station will further enhance this. Currently cycling only forms 2% of all journeys, more and better infrastructure is needed. Issues relate to improving walking and cycling routes, promoting the use of public transport and reducing the use of private cars.
- 12.23.2 Significant public transport investment is happening or planned across Tottenham and the DM Policies DPD contains important strategic policies that will apply to Tottenham. Within the AAP the **overarching policies** also include a clear focus on transport issues through **AAP 07** (Transport) as well as **AAP 09**, insofar as the Green Grid policy provides for a new and improved east-west walking and cycling route between Tottenham High Road and Lee Valley Park, as well as improved access to the Borough's network of open spaces
- 12.23.3 The site allocations for the **neighbourhood areas** highlight sustainable transport issues including requirements for improved railway stations (e.g. Northumberland Park, Bruce Grove), new and improved bus services and better pedestrian and cycle friendly routes (e.g. the proposed Green Link to Lee Valley Park). Some site allocations also refer to the need to minimise parking provision due to excellent local public transport connections.
- 12.23.4 **In conclusion**, the plan is likely to result in positive effects on the sustainable transport baseline through the detailed requirements in the neighbourhood areas. However, given the low level of cycling, the AAP could be strengthened by providing more detail on the proposed cycle network to ensure that a strategic approach is taken. It will be important to coordinate development with cross-borough sustainable transport projects such as the proposed Cycling Superhighway 1 running from Tottenham into the City of London. Also, further options could be considered including introducing 'car free' requirements (with the exception of disabled parking) for residential developments in highly accessible locations and/or requirements developments to support car clubs. This would build on encouragement for contributions to car club schemes or the provision of car club bays; and support for development with no on-site parking (under certain conditions) in the DM Policies DPD.

12.24 Overall conclusions and recommendations

- 12.24.1 The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with 'significant' positive effects identified as likely in terms of: health, housing, community cohesion, accessibility, town centres and economic growth.
- 12.24.2 A potential negative effect (relative to the baseline of 'no plan') is identified on flood risk, though the significance of the effect is uncertain. Flood risk policy in the DM Policies DPD should mitigate this effect to a large extent.
- 12.24.3 It is also important to point out that, whilst positive effects are generally predicted in terms of socio-economic issues/objectives, some risks are also highlighted. Specifically, there is a risk that development consistent with the proposed plan policies could lead to some disruption to existing communities. There is also a risk that some existing business sectors could be impacted by the policy focus on employment site renewal.
- 12.24.4 The appraisal has highlights a number of instances where policy approaches or wording in the plan were amended, following on from public consultation responses and findings of the Interim SA report. It is noted that a considerable amount of work has gone into strengthening the policy approach in relation to biodiversity (Green Grid) and townscape / heritage / character. However, it is considered there remain some opportunities to further refine policies in order to minimise the negative and strengthen the overall positive effects of the plan.

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

13 INTRODUCTION (TO PART 3)

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

14 PLAN FINALISATION

14.1.1 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).

14.1.2 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*.

15 MONITORING

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

- The shift in employment types within Tottenham;
- The effect of estate renewal on existing communities / community cohesion;
- The legibility of historic character;
- Flood risk mitigation measures implemented; 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

Interpretation of Schedule 2

The report must include...

The report must include...

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

APPENDIX II - REGULATORY REQUIREMENTS (2)

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

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 4 ('What's the plan seeking to achieve') presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters are considered in detail within the Scoping Report. The outcome of the scoping report was an 'SA framework', and this is presented within Chapter 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"> • Chapters 5 explains how/why understanding of the issues that should be a focus of alternatives appraisal was refined subsequent to consultation/SA in Feb 2015. • Chapters 6-10 explain, for each of the issues that is a focus of alternatives appraisal at the current time, how/why understanding of reasonable alternatives was refined subsequent to consultation/SA in Feb 2015. • Chapters 6-10 also explain the Council's 'reasons for selecting/developing the preferred approach', i.e. explain how/why the preferred approach is justified in-light of the appraisal of reasonable alternatives. • Chapter 12 ('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 6-10 present alternatives appraisal findings (in relation to each of the plan issues that reasonable need to be a focus of alternatives appraisal at the current time). Chapter 12 ('Appraisal of the draft plan') presents the appraisal of the draft plan. <p>As explained within the various methodology sections, as part of appraisal work consideration has been given to the established SA scope, and the need to consider the potential to various effect characteristics/dimensions.</p>
<p>g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;</p>	<p>The Feb 2015 'appraisal of the draft plan' (Chapter 17 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 12 ('Appraisal of the draft plan') concludes by highlighting a number of ways in which the plan might 'go further' in order to more fully address specific sustainability considerations; however, no explicit recommendations are outstanding.</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>As discussed, Chapters 5-10 deal with 'Reasons for selecting the alternatives dealt with', in that there is an explanation of the reasons for focusing on particular issues and options. Also, Chapters 6-10 explain the Council's 'reasons for selecting/developing the preferred approach' in-light of alternatives appraisal.</p> <p>Methodology/limitations are discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.</p>
<p>i) description of measures envisaged concerning monitoring in accordance with Art. 10;</p>	<p>Chapter 15 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 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 Inspector).</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 2008¹². 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. There are 52 neighbourhood crimes per 1,000 population in Tottenham, compared to 49.3 for Haringey.
- Crime is high in Tottenham compared to Haringey as a whole. Significant criminal activities in the ward include theft and handling and violence against the person.
- Crime is particularly prevalent in Northumberland Park. The challenge facing Tottenham, and the borough as a whole, is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime.
- Historically, property crime (includes robbery, burglary and vehicle crime) in the borough has contributed significantly to overall crime figures, and has also been a top concern of its residents. Unemployment is strongly correlated with acquisitive crime.

Education

- In terms of educational attainment, data for 2013 reveals that 64.9% of the population of Haringey has an NVQ level 3 or above, with this being above regional (64%) and national levels (55.8%).

¹² 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.

- The percentage of Haringey residents with no qualifications (8.6%) is above the London average (8.6%), but below the national level (9.3%). This is most acute in Tottenham Hale, with 22.45% of residents aged 16 and over having no qualifications.
- In 2013, 69% of the pupils who live and study in the Tottenham area achieved level 4+ at Key Stage 2, compared to 79% in London. This reduced to 56.4% in St Ann's. In 2013, 57% of pupils achieved 5 or more A*-C at GCSE level, compared to 64.5% in London. This reduces to 50% in Seven Sisters.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. None of the schools in Tottenham have sixth forms which may indicate low expectations in the young people of Tottenham.
- Tottenham does have outstanding rated schools and the primary school teacher of the year teaches in the area, but educational attainment is still below London levels. Educational attainment is significantly lower than the London average across Haringey and is lowest in White Hart Lane, Northumberland Park and Seven Sisters (all in Tottenham).
- As the population grows additional school places will need to be created.

Health

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

Housing

- Affordability of housing is a significant issue in the area. The borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%).
- The proportion of owner occupation is greater in the west, with concentrations of social rented housing in the east of the borough, reflecting a wider social and economic polarisation.
- The Council is currently preparing a local Strategic Housing Market Assessment, which will provide an understanding of the current and future housing market and how this relates to the borough's housing growth, needs and regeneration.
- The borough has notable levels of homelessness, with 3,000 people officially in temporary accommodation. Just over 30% of households live in social housing, which tends to be concentrated in the east of the borough (which is more densely populated than the west).
- Overcrowding is a major issue with a fifth of all households with at least one bedroom too few for the number and composition of people living in the household. This increases to a quarter of all households in Northumberland Park.

- At just £25,138 per year, average household incomes in Tottenham are around £17,000 less than in the west of the borough and around £8,000 less than the average annual household income for London.
- Tottenham has a population of 118,337 (2012 mid year estimate) which is projected to grow to approximately 147,000 by 2041. The area has a population density of 100.2 persons per hectare (2011), compared to 86.2 for Haringey and 54 for London as a whole. The borough's population is set to increase by 31,234 over the period 2011 to 2021.

Community cohesion

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

Accessibility

- Education is highly accessible, with all 5-10 year olds within 15 minutes of the nearest primary school; 99% of 11-15 year olds within 20 minutes of the nearest secondary school; and all 16-19 year olds within 30 minutes of further education.

Economic growth

- When it is compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. Low wages act as a barrier to home ownership and limit residents' housing options.
- Through the London Plan, Tottenham has two regionally strategic industrial locations, one of which is a preferred industrial location (Central Leaside Business Area – North Tottenham) and the other an industrial business park located in Tottenham Hale. The regeneration of Tottenham Hale and the industrial areas in Central Leaside¹³ offer new business and employment opportunities.
- For long periods Tottenham provided a home to light industry along the Upper Lee Valley but despite a number of active and well used industrial estates it now has, in broad terms, a declining employment base.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 people or less. Tottenham has the highest start-up rate of new businesses in London, despite the recent recession. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings. Business stakeholders have expressed concern about the range of business premises available in the borough.
- Research has indicated that economic growth within Tottenham will come primarily from small and medium sized B1 businesses, the creative sector and retail and leisure opportunities unlocked by the area's regeneration plans.

¹³ The regeneration area of Central Leaside is also partly in the London Borough of Enfield.

Skills and training

- Figures for employment by occupation during 2013 reveal that those in group 1-3 roles¹⁴ (55.4%) across Haringey were higher than the London average (54.6%) and significantly above the national average (44.5%). The percentage of the borough's population that was in group 8-9 roles from April 2013 to March 2014 was 17,100, 15.5% of the total workforce. This figure is higher than the rest of London which was measured at 12.7% of the total workforce.
- The borough is characterised by its polarised skills base. Around 21% of the borough's working age population has a Level 1 or below qualification. Meanwhile, 40% have a Level 4 or above qualification.
- A high proportion of Tottenham residents are employed in low level jobs or are receiving benefits.

Economic inclusion

- Tottenham has some of the highest levels of unemployment in London and England. In 2011, 63.7% of 16-64 year olds in Tottenham were in employment, below both the London and national rates of 68.2% and 70.4% respectively.
- In March 2012, the Job Seeker Allowance (JSA) claimant count in Haringey was 10,393; or 6.5% of the total working age population (16-64 year olds). This is significantly above the national and London rates.
- Youth unemployment in Tottenham is particularly an issue with 5.4% of 18-24 year olds in the area claiming JSA, increasing to nearly 10% in Northumberland Park.
- High levels of unemployment and deprivation, along with a number of other factors, caused riots in Tottenham in the summer of 2011. This has led to a number of discussions on the prospects for the area's young population and in turn has triggered investment from the borough and the Mayor of London.
- In 2012/13 the median household annual income in Tottenham was £21,834, substantially below both Haringey (£33,140) and London (£35,740).

Town centres

- Tottenham has three town centres, Tottenham Green, Bruce Grove and High Road West; these line the 3.2km long Tottenham High Road. The scale of the High Road has to a large part been an obstacle to creating a cohesive and distinctive High Street experience.
- It appears that the economic downturn is still having an impact on the retail sector, and has stunted the ability of town centres across the borough to fulfil their role and function. However Tottenham Hale was the best performing of Haringey's town centres with no vacant town centre floor space.
- Haringey's town centre vacancy rates have increased in recent years but overall, they remain lower than national and regional averages. However, the borough's town centres are not performing equally in this respect.
- Tottenham's town centres need to be maintained and enhanced to retain retail capacity. Additional shopping and service facilities are needed in order to meet projected growth in expenditure.

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.

¹⁴ Soc 2010 major group 1-3: Managers, directors and senior officials; Professional occupations; Associate professional & technical. Soc 2010 major group 4-5: Administrative & secretarial; Skilled trades occupations. Soc 2010 major group 6-7: Caring, leisure and Other Service occupations; Sales and customer service occupations. Soc 2010 major group 8-9: Process plant & machine operatives; Elementary occupations.

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

Townscape and cultural heritage

- The Tottenham High Road Historic Corridor comprises the following six Conservation Areas: North Tottenham, Scotland Green, Bruce Grove, Tottenham Green, Seven Sisters/Page Green and South Tottenham. There are also three other Conservation Areas: Bruce Castle, St Ann's and Clyde Circus¹⁵. Tottenham also includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas.
- The North Tottenham Conservation Area is identified on English Heritage's Heritage at Risk Register as a conservation area at risk.

Open space

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

Water resources

- Tottenham is located within the London catchment of the River Thames River Basin District which includes the River Lee and its main tributaries. The catchment is highly urbanised and the majority of rivers are designated heavily modified and there is a distinct lack of natural river processes throughout the catchment. The modification of rivers including in-stream structures and culverts has led to loss of habitat diversity and the creation of barriers for fish migration.
- The River Lee (including the Lee Navigation) on the borough's eastern boundary is the principal watercourse in the area. Upstream of its upper confluence with Pymmes Brook the Lee has been assigned River Quality Objective (RQO) class 2 (good quality) whilst downstream of the lower confluence water quality is RQO 5 (poor quality).
- Haringey is home to the North London Artificial Recharge wells in Wood Green, Tottenham and Hornsey, where surface water is periodically pumped into the chalk aquifer to balance deep ground water abstraction. Land use activities within the source protection zones are closely monitored by the Environment Agency.
- Haringey-specific data is not available for water consumption however at the London level¹⁶ 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.

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

¹⁶ 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)

Flood risk and climate change

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

Air quality

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

Noise

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

Energy and carbon

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

Waste management

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

Sustainable transport

- Tottenham has some of north London's best transport links with it only being 12 minutes on the tube (Victoria line) or train to central London. This is coupled with express rail services to Stratford, the City, Stansted Airport and Cambridge

- Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider borough, delivering a major shift in north Tottenham with high frequency services connecting Northumberland Park (as well as Tottenham Hale and Seven Sisters) with central London and other growing parts of the capital.
- Stronger orbital public transport capacity is required to serve key development areas, town centres and residential areas. Transport links need to be improved to major employment opportunity areas outside of the borough including Stratford, Brent Cross and Stansted Airport.
- Transport for London has invested £20m into a major redevelopment of Tottenham Hale Tube, rail and bus station.
- Investment is also committed for £90 million for the Gospel Oak – Barking London Overground Line providing capacity and frequency improvements to south Tottenham, and £40 million for road improvements to unlock development sites near Tottenham Hale by dismantling the one-way gyratory system.
- Over half of Haringey households do not own or have access to a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car.
- Tottenham's main road network is often congested with high flows of traffic on the A10 and A1010. Local resident streets are frequently heavily parked.
- Currently cycling only forms 2% of all journeys. Haringey has a target for a modal share by cycling of 5% by 2026. A local cycle route network including Quietways has been developed and Cycle Superhighway 1 runs through the area but more infrastructure is needed.

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. As discussed under the 'community cohesion' heading within the draft plan appraisal (see Part 2, above), the level of regeneration proposed should help to make the area a more attractive place to live with more stable and connected communities and better access to high quality public spaces, thus contributing to community cohesion. However, this level of growth and change may bring some disruption to existing communities, for example where re-housing is needed to allow for refurbishment or re-provision, or where private housing rents become an issue for some residents. Such disruption will need to be managed sensitively to ensure that existing social capital is not undermined.
- 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. As discussed under the 'health' heading within the draft plan appraisal (see Part 2, above), a strategic objective of the AAP is to provide 'a strong and healthy community' through measures such as improved health care provision, the creation of a green grid, and increasing the supply of energy-efficient homes. AAP 01 picks up on this theme by requiring that development proposals demonstrate how they have proactively responded to the vision and regeneration objectives for Tottenham, including to improve the quality and supply of housing to meet housing needs and improve health and wellbeing.
- 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 Roma 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. part of the spatial vision for Haringey is that "new schools provided in Tottenham Hale and North Tottenham act as a focal point for local community life, and educational attainment across the area is on par with the rest of the Borough"; and it is noted that the North Tottenham section highlights the need for enhanced education facilities and identifies a site for a learning and education hub.
- 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), support for regeneration in Tottenham could indirectly lead to reduced crime / fear of crime in the medium term

through creating more high quality environments and more stable communities. AAP 06 includes requirements on urban design and character and seeks to maximise opportunities to create legible neighbourhoods, which may assist in creating safe, modern and high quality places.

- 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 a strategic objective of the AAP is to create a different kind of housing market with a range of high quality housing at a range of prices and tenures. Policy AAP 01 also sets out that proposals will be expected to maximise the use of public and private sector investment to provide a range of types and sizes of homes as well as to create mixed and balanced communities.
- 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. As discussed under the 'economic inclusion' heading, as part of the appraisal of the draft plan ('Part 2' above), Tottenham is expected to meet the provision for the bulk of the London Plan's forecast growth of 12,000 new jobs in the Borough by 2026. This scale of employment growth should help to increase local access to jobs; however, the extent of this access will depend, in part, on whether the employment offer is compatible with residents' skill sets.
- 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. Support for regeneration through the Tottenham AAP will contribute to improved environmental quality, and there is also set to be a targeted approach to the protection and enhancement of open space (and access to this); however, this is a subject that should be the focus of ongoing scrutiny and monitoring to ensure that opportunities are fully realised. It will be important to ensure that the pressure to meet growth targets is not at the expense of implementing the recommendations of the 2014 Open Space and Biodiversity Study, for example around improving access to small parks and amenity green spaces and securing new open space as part of new development in North Tottenham.
- 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, the Tottenham AAP is set to include a range of requirements to ensure that strategic transport infrastructure is appropriately integrated as part of regeneration, and that new development achieves improvements in public transport accessibility, particularly to encourage modal shift and more sustainable movements. This is likely to have beneficial effects on access to local employment opportunities, services and community facilities.

APPENDIX V – SPATIAL STRATEGY

Introduction

Chapter 6 (within 'Part 1', above) presents summary appraisal findings in relation to the following spatial strategy alternatives:

- Option 1** - Focus at the growth areas of Tottenham Hale and North Tottenham, with some growth also targeted at the 'area of change' of Tottenham High Road (i.e. the Council's preferred option)
- Option 2** - As per (1), but with some additional growth targeted at the northern edge of Tottenham, and commensurately less growth elsewhere.

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

Methodology

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

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

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

Effects are predicted taking into account the criteria presented within Regulations.¹⁷ 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).

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

¹⁷ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2
Crime	<p>Crime is high in Tottenham with many residents concerned about safety, gang activity and high crime rates. Issues are particularly associated with Northumberland Park and Tottenham Hale.</p> <p>There is very little potential to differentiate between the alternatives. Option 2 (additional emphasis on North Tottenham) might mean that there is a risk of regeneration opportunities at Tottenham Hale not being fully realised, but there is no certainty in this respect.</p> <p>Both options would support significant regeneration; hence, both are considered likely to have positive effects on crime. However, significant effects are not predicted, given the limited extent to which the planning system can influence levels of crime and anti-social behaviour.</p>	=	
Education	<p>Educational attainment in Tottenham is improving but it remains below London levels. In 2013, 69% of the pupils who live and study in the area achieved level 4+ at Key Stage 2, compared to 79% in London. In 2013, 57% of pupils achieved 5 or more A*- C at GCSE level, compared to 64.5% in London. This reduces to 50% in Seven Sisters. The AAP highlights Tottenham Green/ Seven Sisters as having an important education function.</p> <p>Neither option would involve a strategic focus of growth at Tottenham Green/ Seven Sisters, and there is no other basis for differentiating between the alternatives (although it is noted that the proposals for Meridian Water just across the northern borough boundary in Enfield include at least two primary schools and a secondary school, relevant to option 2).</p> <p>Both options would support significant regeneration, and as part of this there will be scope to significantly enhance and improve education provision in the area; however, it is not clear that either option will directly lead to significant positive effects.</p>	=	
Health	<p>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>There is very little potential to differentiate between the alternatives. One factor is the proximity of growth to the Lee Valley Regional Park, with a view to ensuring good access to high quality open space, but in this respect the alternatives perform similarly.</p> <p>Both options would support significant regeneration, and as part of this there will be scope to significantly enhance health service provision (e.g. access to GPs) as well as to better address the wider determinants of health such as access to green space. Either spatial strategy option would support significant positive effects.</p>	=	
Housing	<p>Option 2 would involve redesignating some land currently designated as Strategic Industrial Location (SIL), possibly along similar lines to proposals for the nearby Harbot Road SIL being progressed (by London Borough of Enfield) through the Central Leaside Area Action Plan. Within Harbot Rd SIL, the proposal is for the southern part to be released for residential, the northern part to be retained for industrial uses (albeit with a recognition that it will be intensified, and must function as part of a mixed use neighbourhood) and for a central belt to be a transition zone (designated as an 'Industrial Business Park'). However, it is recognised that the context at Harbot Road SIL is very different to North Tottenham, as it sits within the wider Meridian Water Housing Zone (as designated by the Mayor).</p>	2	★ 1

Topic	Discussion	Opt 1	Opt 2
	<p>In conclusion, it is not entirely clear precisely what opportunities there are for delivering additional housing under Option 2, but it is appropriate to conclude that additional housing would be delivered. That said, Option 1 also performs very well in terms of this objective. Option 1 would deliver large amounts of new housing, and enable a focus on providing greater choice, quality and diversity of housing across tenures. Therefore both options are considered to have significant positive effects on this objective.</p>		
Community Cohesion	<p>The Tottenham riots of 2011 highlight the need to plan for maintained/enhanced community cohesion in this area in particular.</p> <p>Both options would involve large scale regeneration of Tottenham with the potential to significantly improve community cohesion, for example by creating integrated, mixed-tenure developments; enhancing existing town centres and improving open space provision and access.</p> <p>However the effect is uncertain as development could bring some disruption to existing social networks, for example as a result of re-housing to allow refurbishment and re-provision. As such, it is not possible to conclude that either option would lead to significant effects.</p> <p>There is arguably some potential to differentiate between the alternatives, in that Option 2 would involve an increased emphasis on redevelopment / change within North Tottenham. However, it is not possible to differentiate with any certainty. On one hand, additional housing in close proximity to an area of Estate Renewal (Northumberland Park) could lead to benefits / help to ensure that negative effects are minimised; however, on the other hand, redevelopment of employment land (which would be likely) might be classed as redevelopment with less of an explicit focus on regeneration.</p>	=	
Accessibility	<p>Access to cultural and leisure facilities and to essential services (banking, health, education) varies between neighbourhoods. The three District Centres are within the southern half of Tottenham, at Bruce Grove, Seven Sisters and Tottenham Hale, whilst in the northern half of the area there are just two local centres.</p> <p>Under Option 1 there will be scope to significantly improve access, through development of a new district centre in Tottenham Hale and also development in North Tottenham capitalising on the investment being made by Tottenham Hotspur FC on their stadium site. Significant positive effects are likely.</p> <p>Option 2 might bring with it the risk that opportunities in Tottenham Hale might not be realised to the fullest extent, and that there might be an over-supply of housing (from an access perspective) in the north of the area (albeit recognising that the area is also in close proximity to Meridian Water, where a new local centre is set to be delivered through the emerging AAP). On this basis, significant positive effects are not predicted.</p>	★ 1	2
Economic Growth	<p>High and increasing unemployment is perhaps the greatest challenge facing the borough; Tottenham has some of the highest levels of unemployment in London and the UK. A tenth of all Job Seekers Allowance claimants in Haringey (10,500) live in the Northumberland Park Ward, which has the highest number of out of work benefits claimants in London.</p> <p>While both options should generate more new employment opportunities in Tottenham (relative to the baseline 'no plan' scenario), there will also be some losses and/or disruption to existing businesses. Option 2 would likely entail re-designating the Strategic Industrial Land which sits adjacent to the boundary with Enfield (e.g. Brantwood estate); this would have a significant adverse effect on job creation, the local economic base and ultimately the job</p>	★ 1	2

Topic	Discussion	Opt 1	Opt 2
	numbers target attributed to Haringey. Option 1 is therefore the preferred option here, and significant negative effects are predicted for Option 2.		
Skills and Training	Access to training facilities should be enhanced as part of wider regeneration efforts. It may be possible to secure skills and training benefits for local people through the construction process. However, the spatial strategy has little bearing on this objective.	n/a	
Economic Inclusion	Physical accessibility to jobs should be enhanced as part of the large scale of regeneration in Tottenham anticipated under both options, including through new employment opportunities and improved transport links. However option 2 would likely entail re-designating the Strategic Industrial Land which sits adjacent to the boundary with Enfield (e.g. Brantwood estate); this would have an adverse effect on the local economic base and thus on physical accessibility to jobs in this part of Tottenham. Particular groups might be particularly affected, specifically those who rely on employment within industrial sectors. This is an important consideration, as a lack of transferable skills may mean an increased risk of unemployment. On this basis, significant negative effects are predicted for Option 2.	★ 1	2
Town Centres	Both options would support the improvement of the viability and vibrancy of Tottenham's District Centres and Local Centres. The creation of the new district centre at Tottenham Hale, to support large scale residential-led regeneration in the area, would be likely under both option; however, there might be a risk that opportunities are not realised to the fullest extent under Option 2 (as this option would involve diverting some growth from Tottenham Hale to North Tottenham).	★ 1	2
Biodiversity	The spatial strategy is a consideration, as it has a bearing on the extent to which residents are able to access the Lee Valley Regional Park (access currently being quite poor), which straddles the eastern boundary of Tottenham. It might be suggested that increased access leads to risks to biodiversity; however, effects would always be uncertain, given the potential to manage access. Significant negative effects are unlikely. It is not clear that it is possible to differentiate between the alternatives. Both Tottenham Hale and North Tottenham are associated with opportunities to improve east-west links through to the Regional Park.	=	
Townscape and Cultural Heritage	Tottenham has nine Conservation Areas and includes several high quality listed and locally listed buildings along the High Road and outside the conservation areas. It might be suggested that Option 2 is preferable as additional growth in North Tottenham would take the pressure of the need to redevelop within areas that are more sensitive from a heritage perspective (e.g. areas along the Tottenham High Road designated as a Conservation Area); however, this is highly uncertain. There is good potential for redevelopment to facilitate the achievement of heritage objectives, e.g. by improving the setting of listed buildings so that their heritage significance is better appreciated.	=	
Open Space	Tottenham has a severe problem with a lack of accessibility to the wider natural environment. Areas deficient in public open space include Northumberland Park, parts of White Hart Lane and parts of Bounds Green ward. The Lee Valley Regional Park straddles the eastern boundary of Tottenham although access is poor. It is not clear that either option has the potential to result in significant effects,	=	

Topic	Discussion	Opt 1	Opt 2
	<p>as the broad spatial strategy does not have a direct bearing on the resource of open space. Under either option there would be opportunities to improve access to open space, particularly by improving east-west links through to the Lee Valley Park from Tottenham Hale and Northumberland Park. It might be suggested that Option 2 would lead to the potential to create new open spaces; however, there is no certainty in this respect.</p>		
Water Resources	<p>It is not clear that the broad spatial strategy has a bearing on water resource objectives. It is not thought that there are any areas within Tottenham where growth should be restricted because of a sensitive water environment; and under either option it will be possible to put in place sustainable drainage systems, and design-in water efficiency measures.</p>	n/a	
Soil and Land Quality	<p>The majority of development proposed in Tottenham is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Tottenham which may need to be remediated before development. It might be suggested that Option 2 is preferable, as it would likely involve additional redevelopment of employment locations where contamination may be an issue, but there is no certainty.</p>	=	
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. Tottenham Hale has more than 50% of the ward lying within Flood Zone 2. Much of the area to the north and east of Northumberland Park along the boundary with Enfield also lies within Flood Zone 2.</p> <p>On the basis of this discussion, it is not possible to differentiate between the alternative. Significant negative effects are not necessarily likely under either option, given the potential to address flood risk through site allocations, masterplanning and design measures.</p>	=	
Air Quality	<p>The area suffers poor air quality, primarily because of traffic congestion. Improving air quality is a challenge, particularly along major roads which provide a significant proportion of PM10 concentrations in Haringey.</p> <p>Without detailed investigation, it is difficult to be certain regarding the merits of the alternatives in terms of avoiding traffic congestion. Tottenham Hale is set to develop as a transport hub, with a new bus interchange facility, a new station, improved train frequencies, and Crossrail 2 in the long term; whilst North Tottenham will benefit from increased train frequencies at Northumberland Park station and Crossrail 2 in the long term.</p>	=	
Noise	<p>Option 2 could potentially involve some additional mixed use redevelopment of existing employment sites, which is a strategy that leads to challenges in terms of managing noise pollution, and residential amenity more generally. However, it is not clear that this is a significant consideration. There is the potential to address such issues through masterplanning and design.</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 DM Policies DPD).</p> <p>On this basis, there is little potential to differentiate between the alternatives. It might be suggested that either spatial strategy option has the potential to lead to significant positive effects; however, there is a need to consider that wider factors will also have a significant bearing on per capita emissions, such as tightening of the energy efficiency standards for new homes (in the Building Regulations), changes in transport technology and changes in the</p>	=	

Topic	Discussion	Opt 1	Opt 2
	efficiency of household appliances.		
Waste Management	<p>Haringey Council is working with North London partners to progress the North London Waste Plan. This plan will identify locations suitable for waste management facilities to meet London Plan apportionment targets. Haringey as a whole achieves good recycling rates. There are two reuse and recycling centres and these accept an increasing range of materials and items for reuse or recycling. Other waste, if suitable, is sent for incineration at Edmonton Waste Incinerator, which also generates electricity for the borough. It was judged that the alternative options would have little bearing on this topic. Strategic Policies and Development Management policies in waste and recycling will have a far greater effect.</p>	n/a	
Sustainable Transport	<p>Both spatial strategy options involve significant growth at Tottenham Hale. This will be centred on a redeveloped Tottenham Hale station (with better facilities for buses, cyclists and pedestrians) which already has excellent transport links via National Rail and London Underground services and may also serve Crossrail 2 in future. This should have a significant positive effect in terms of encouraging the use of sustainable transport and reducing the need travel to meet daily needs for the residents of the new large scale residential development in the area.</p> <p>Growth in North Tottenham will be accompanied by access and interchange improvements to White Hart Lane and Northumberland Park stations respectively, supporting increased use of these rail links (and possibly also Crossrail 2 in future). Also, the relocation of Angel station in Enfield southwards to provide a new station to serve the Meridian Water development may also offer an alternative option for developments located on the northern edge of Tottenham.</p> <p>Overall it is anticipated that both spatial strategy options would have significant positive effects on sustainable transport, and there is little potential to differentiate between the alternatives.</p>	=	
<p><u>Summary</u></p> <p>The alternatives perform similarly in terms of a range of objectives, with both options likely to ensure that regeneration opportunities are realised. Option 2 would involve an additional emphasis on growth in North Tottenham, which has merit in terms of some objectives (including housing, given that some land currently used solely for employment would likely become mixed use); however, there would be a risk that diverting growth to North Tottenham would compromise the achievement of regeneration objectives at Tottenham Hale. Also, Option 2 performs poorly in terms of economic growth and economic inclusion, given the likelihood of this option necessitating re-designating Strategic Industrial Land (SIL). Whilst plans for nearby Meridian Water demonstrate the benefits that can accrue through re-designating SIL, the North Tottenham context is not the same, and it is not clear that the potential for similar benefits exists.</p>			

APPENDIX VI – EMPLOYMENT SITES

Introduction

Chapter 7 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following spatial strategy alternatives:

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

Option 2 - No allowance for cross subsidy. Only allow employment uses on designated sites.¹⁸

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

Methodology

See discussion in Appendix V.

Appraisal findings

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

¹⁸ N.B. These alternatives are also appraised within the DM Policies DPD Interim SA Report

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

APPENDIX VII – TOWN CENTRE HIERARCHY

Introduction

Chapter 8 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for town centres:

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

Option 2 - Retain / reinforce existing town centre hierarchy.

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

Methodology

See discussion in Appendix V.

Appraisal findings

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

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

APPENDIX VIII – BUILDING HEIGHTS

Introduction

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


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



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

Methodology

See discussion in Appendix V.

Appraisal findings

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

Topic	Discussion	Opt 1	Opt 2
	Option 1 will be positive in terms of enhancing the town centre.		
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	Option 1 takes a location specific approach to building heights based on ensuring that the height of new buildings responds to and helps to define the surrounding character. In this regard, the greater level of control for specific locations afforded by Option 1 should have a positive effect in terms of protecting and enhancing townscape character and quality (and potentially improving legibility) whilst allowing high quality high rise development in suitable locations.		2
Open Space	No notable implications.		
Water Resources	No notable implications.		
Soil and Land Quality	No notable implications.		
Flood Risk and Climate Change	No notable implications.		
Air Quality	No notable implications.		
Noise	No notable implications.		
Energy and Carbon	No notable implications.		
Waste Management	No notable implications.		
Sustainable Transport	The location specific approach to building heights allows for taller buildings in particular locations that have high public transport accessibility such as Tottenham Hale, Apex House and close to Northumberland Park station and White Hart Lane stations (the possible exception being adjacent to the stadium development at Northumberland Park). Focusing these high trip-generating developments in such locations will support increased sustainable transport use per capita.		2
<p>Summary</p> <p>When considering the acceptable heights of new buildings it is necessary to consider the need to respond to, and where possible help to define, the surrounding character, as well as the need to make the most of opportunities for intensification and regeneration.</p> <p>The locally specific approach to building height requirements would give a greater level of control/clarity over tall building location and design, with positive effects on selected town centres; protection and enhancement of townscape character and quality; and use of sustainable transport modes (by focusing these high trip-generating developments in locations that are highly accessible by public transport). Both options would contribute to housing delivery and economic growth. No significant effects were identified.</p>			

APPENDIX IX – AFFORDABLE HOUSING

Introduction

Chapter 10 (within ‘Part 1’, above) presents summary appraisal findings in relation to the following alternatives for building heights policy:

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


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

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

Methodology

See discussion in Appendix V.

Appraisal findings

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

Topic	Discussion	Opt 1	Opt 2
Cohesion	communities. However in the short term the large scale regeneration may create disruption for existing residents, which will need to be managed as effectively as possible.		
Accessibility	No notable implications.		
Economic Growth	Both options would support delivery of a range of high quality housing that will attract more people and more wealth to the area, supporting local economic growth. Option 1 may have the greater impact on economic growth as it would create more intermediate housing than option 2, thus attracting more residents that are able to afford this form of housing and by extension more disposable income to spend locally.	★ 1	2
Skills and Training; 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; and Sustainable Transport: No notable implications.			
<p><u>Summary</u></p> <p>Tottenham experiences high concentrations of social housing, particularly social/rented accommodation, and poor quality privately rented accommodation. People are attracted to Tottenham partly due to the relatively cheap cost of living compared to other parts of London. However, there is an issue with local social stability. with very high levels of people living in temporary accommodation and newcomers often leaving the area once they have established themselves more economically. The AAP seeks to create more stable and balanced communities, including by providing a greater variety of housing (e.g. in terms of prices and tenures) and more home ownership, as well as wider interventions (e.g. improving schooling). Both options would support positive change of the area over time as housing quality is improved and a more stable population is established. Option 1 would provide more intermediate accommodation and therefore would have a greater positive impact in terms rebalancing the high concentrations of social rented accommodation, creating more mixed and balanced communities of different affordable housing tenures. However, Option 1 might lead to more marked changes on the existing make-up of the local area, potentially with implications for 'community cohesion' related objectives. It is important to note that the public consultation conducted on broad proposals for Tottenham (January 2014) highlighted concerns about the impacts of area change, including on housing affordability. The Council should consider means to monitor and where necessary mitigate impacts of development on residents.</p>			