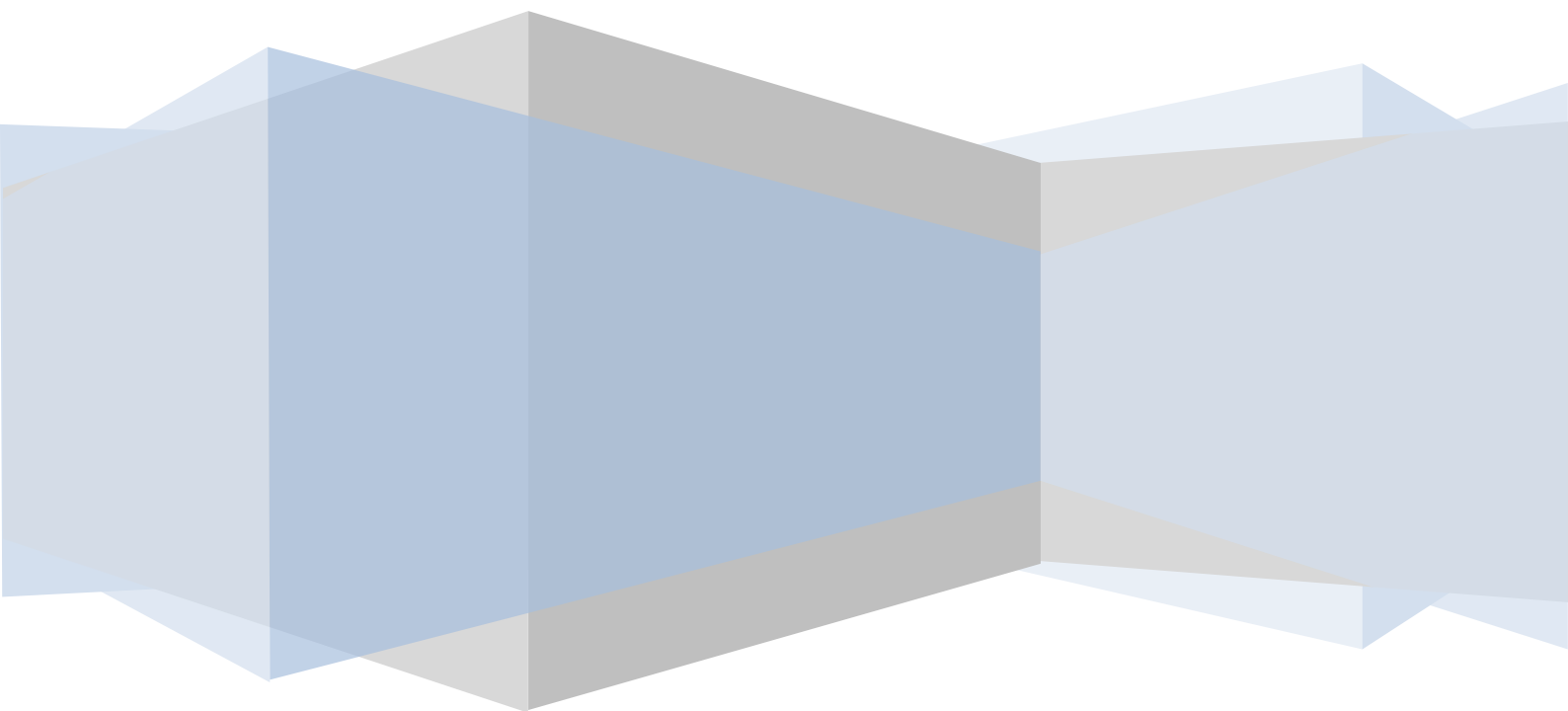




Sustainability Appraisal

Wood Green Area Action Plan

Regulation 18 Consultation 14 Feb – 31 March 2017



1 BACKGROUND

1.1.1 This Sustainability Appraisal (SA) is being prepared in support of the emerging Wood Green Area Action Plan (AAP) Development Plan Document (DPD); henceforth known as 'the Wood Green AAP'. Once adopted, the AAP will assist the delivery and implementation of significant development proposals for the Wood Green Growth Area.

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 Wood Green AAP, and as such each of the three SA questions is answered in turn below, with a 'part' of the report dedicated to each.

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)

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.

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 Wood Green 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 Wood Green'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 Wood Green specific policies aimed at ensuring new development is ambitious, appropriate and sustainable in a Wood Green 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 objectives of the Wood Green AAP is to help deliver:

1. Creating a productive and innovative economy
2. Creating a town centre fit for a modern economy
3. Creating a liveable and interactive urban environment
4. Revitalising the evening economy
5. Creating new homes
6. Serving the borough
7. Celebrating the areas diversity and heritage

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 Historic England.⁶
- 4.1.3 As such, an SA Scoping Report was published for consultation in 2016.⁷ 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.

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?

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/Wood Green-area-action-plans-aaps](http://www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/Wood%20Green-area-action-plans-aaps)

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
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? • Avoids impacts on the quality and extent of existing recreational assets, such as formal or informal footpaths?
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?
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?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
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? • Ensure current ecological networks are not compromised, and future improvements in habitat connectivity are not prejudiced?
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? • Conserve or enhance and better reveal the significance of heritage assets? • Deliver high quality design, that contributes to the local character and distinctiveness • Improve understanding and enjoyment of the historic environment? • Regenerate heritage assets so they continue to deliver cultural, social, environmental and economic benefits?
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?
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?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
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 Wood Green
- Redevelopment of existing homes to increase town centre floorspace
- Crossrail 2 Station location
- Building heights / tall building clusters
- The establishing of an ongoing set of premises for local creative industries

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 issues present an appropriate basis to consider a range of different outcomes that could be planned for in Wood Green. They have been identified during the plan-making process as particular tensions or choices that have been suggested by various parties, and/or are issues that officers consider will be of particular interest to local residents and businesses.

5.1.4 The spatial strategy for Wood Green was consulted upon in the Issues & Options consultation which was held in January-March 2016. Four issues were consulted upon:

- Option 1 – High Rd rejuvenation
- Option 2 – Residential led town centre
- Option 3 - Comprehensive redevelopment
- Option 4 – Complete transformation

5.1.5 The redevelopment of (predominantly) privately owned homes on Mayes and Caxton Rds in order to expand the envelope of mixed use developments within an enlarged Wood Green town centre is considered to be an intervention that comes with significant controversy. As such the impacts of:

- Option 1 – Redeveloping the properties at Mayes and Caxton Rd
- Option 2 – Retaining the properties at Mayes and Caxton Rds.

5.1.6 Growth in the AAP will be spurred by the introduction of Crossrail 2 into the area. Station locations will be important in influencing patterns of growth in the centre, and options are as follows:

- Option 1 – Two stations at Turnpike Lane and Alexandra Palace
- Option 2 – One station in central Wood Green

5.1.7 The four 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 approaches examined in this document 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 further topics could emerge 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:

- 5.1.8 In many instances thematic area-wide policies will often closely reflect the policy direction set out by the Strategic Policies DPD, (which were developed alongside a process of Sustainability Appraisal). Further, borough-wide policies in the emerging DM Policies DPD will apply to the Wood Green area, and this Plan has also been the subject of SA, with alternatives appropriately considered.
- 5.1.9 The preferred approach to site allocations in Wood Green 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 Wood Green AAP.

Structure of this part of the SA Report

- 5.1.10 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?
- 5.1.11 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’.

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.

6 THE SPATIAL STRATEGY FOR WOOD GREEN

6.1 Introduction

6.1.1 The AAP is more than a collection of site and thematic policies – 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, and the presence of a suite of Site Allocations delivering a quantum of growth already over the plan period, it is clear that options are somewhat limited. The Alterations to the Strategic Policies, and emerging London Plan, establishes Wood Green (including Haringey Heartlands), as a Growth Area, with the Site Allocations identifying a suite of developable land parcels to give form to the strategic pattern of development.

6.2.2 As Wood Green is identified as a Growth Area, and identified as a future Opportunity Area in the London Plan (2015), it was considered appropriate to prepare an Area Action Plan for Wood Green, in order to provide a tailored set of policies to manage development within the growth area. In January 2016 an Issues & Options version of the AAP was produced which included 4 options. These contain different levels of growth, starting with the rejuvenation of the High Street, and ending with complete transformation within the area. These options included a range of levels of growth starting with the 4,300 residential units included in the Site Allocations DPD, and increasing to 6,000 net additional units in the most ambitious option.

6.2.3 These options are considered in this report as reasonable alternatives, and can be summarised as:

Option 1 - High Rd rejuvenation

Option 2 – Residential-led town centre

Option 3 - Comprehensive redevelopment

Option 4 – Complete transformation

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.

Table 6.1: Summary appraisal findings: Spatial strategy

Relevant sustainability topics	Option 1	Option 2	Option 3	Option 4
Crime			=	
Education			=	
Health			=	
Housing	4	3	2	1
Community Cohesion			=	
Accessibility	2	2	1	1
Economic Growth	2	2	1	1
Economic Inclusion			=	
Town Centres	3	3	2	1
Biodiversity			=	
Townscape and Cultural Heritage	2	2	1	1
Open Space			=	
Soil and Land Quality			=	
Flood Risk and Climate Change			=	
Air Quality			=	
Energy and Carbon			=	
Sustainable Transport	2	2	1	1
Noise	1	1	2	2

Relevant sustainability topics	Option 1	Option 2
<p>The alternatives perform similarly in terms of a range of objectives, with all options likely to ensure that at least some regeneration opportunities are realised. Options 3 and 4 would involve an additional emphasis on growth in Wood Green, which has merit in terms of some objectives, including housing and employment aspects as land currently used solely for employment would likely become more intensively used for mixed use development. While there are risks when taking forward development, particularly at higher intensity of creating negative outcomes on issues including townscape, biodiversity, and social inclusion, it is considered that the suite of Development Management policies in the Locla Plan will ensure that these issues are addressed appropriately through any planning applications.</p>		

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

6.4.1 The preferred option promotes an ambitious approach to growth and development in Wood Green. Of all the options this one offers the most significant opportunity to meet the Council’s strategic regeneration objectives for the area, providing the highest quantum of jobs and homes for the new area, intervening on sites which currently create poor circulation, maximising the benefit of introducing Crossrail 2 to Wood Green, and creating enhanced permeability through the area. As such Option 4 performs more highly against sustainability criteria. Opportunities to increase density further will further increase the benefits that can be achieved.

7 REDEVELOPMENT OF EXISTING HOMES TO INCREASE TOWN CENTRE FLOORSPACE

7.1 Introduction

7.1.1 In order to safeguard Wood Green's Metropolitan Town Centre status, and secure its future as a key node within north London there is a need to increase commercial floorspace within the centre. This can be achieved by two principal methods, intensifying existing sites within the town centre, or extending the town centre to introduce more sites to accommodate retail uses. There are a number of sites which contain various levels of existing residential units on them in the Preferred Option document. The majority of these have existing allocations for redevelopment, and as such are "priced in" to the Local Plan already. The additional sites identified in the Wood Green Preferred Option document are the properties on Caxton and Mayes Rds, which are terraced properties of Victorian vintage. Additionally the properties above the Mall are now included as part of a redevelopment proposal, rather than as an opportunity principally for public realm improvements in the existing Site Allocations DPD.

7.2 Reasons for selecting the alternatives dealt with

7.2.1 The alternatives are to include, or not, the properties on Mayes and Caxton Rds for redevelopment. The option to include these properties is reasonable in that it increases options for new town centre uses, and intensification within a highly sustainable location. This potentially comes at the cost of some existing housing stock, which will carry with it sustainability effects for the existing residents.

7.2.2 The following alternatives have been appraised:

Alternative 1 – Redeveloping the properties at Mayes and Caxton Rd

Alternative 2 – Retaining the properties at Mayes and Caxton Rds.

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.

Table 7.1: Summary appraisal findings: Redevelopment of houses to increase town centre floorspace

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Education	=	
Health	=	
Housing	1	2
Community Cohesion	2	1
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	1	2
Noise	2	1

Summary

Requiring the houses to be redeveloped will have some potential short term negative effects, by virtue of impacting on the existing residents of these sites. The overall impact of redeveloping these properties is likely to be positive however, as more jobs, homes, and sustainable transport services come to the area. Noise is likely to increase, but this is appropriate in this location, as part of a vibrant Metropolitan Centre. While there is a potential loss of existing Victorian housing properties which appear to be in good condition, the benefits of the new development on townscape are not easily quantified to judge whether this will be an improvement or not.

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

7.4.1 There is a need to ensure that Wood Green serves as a Metropolitan Centre for the benefit of the local community, and the borough. The removal of a relatively small number of residential properties to increase the town centre and employment offer that benefits the north London sub region, while increasing the total number of homes on the site is considered to be justified. The policy will also work in conjunction with the DM Policies DPD to ensure the design of new development is appropriately managed with regard its impact on adjoining properties.

8 CROSSRAIL STATION OPTIONS

8.1 Introduction

8.1.1 Crossrail is expected to be a major spur for growth within Wood Green. The currently safeguarded Crossrail alignment includes two stations, one each at Turnpike Lane and Alexandra Palace. The Council's preferred station arrangement is for a single station in the centre of Wood Green, due to the significant developable land parcels in this area.

8.2 Reasons for selecting the alternatives dealt with

8.2.1 TfL is currently considering two options for Crossrail stations, its initially proposed two-station arrangement, and the Council's preferred on central station arrangement. While both arrangements will spur growth significantly, they will create different spatial patterns, the outcomes of which are tested here.

8.2.2 The following alternatives have been appraised:

Option 1 - Two stations, one each at Turnpike Lane and Alexandra Palace

Option 2 - One station in central Wood Green

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: Crossrail Station Location

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Education	=	
Health	=	
Housing	2	1
Community Cohesion	=	
Economic Growth	2	1
Economic Inclusion	2	1
Town Centres	2	1
Biodiversity	=	
Townscape and Cultural Heritage	=	
Open Space	=	
Soil and Land Quality	=	
Flood Risk and Climate Change	=	
Air Quality	=	
Energy and Carbon	=	
Sustainable Transport	=	
Noise	=	
<p><u>Summary</u></p> <p>It is adjudged that there are significant regenerative benefits of locating the Wood Green station in the centre of Wood Green, including increasing gross numbers and access to jobs, increasing new homes, and drawing investment into the town centre.</p>		

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

8.4.1 The preferred option is to have one central Wood green Crossrail station, largely on the basis of the regenerative impact it can have in the central and Heartlands areas of Wood Green. There are transport benefits in establishing connections with the Piccadilly Line at Turnpike Lane, and the Moorgate line at Alexandra Palace, although these are somewhat offset by the replacement of the Alexandra Palace station as part of a potential New Southgate Opportunity Area.

9 REDEVELOPMENT OF HORNSEY FILTER BEDS

9.1 Introduction

9.1.1 The Hornsey Filter Beds were nominated as a potential development site during the Council's Call for Sites in 2012. They are forecast to become surplus to operational requirement over the plan period, and represent a large piece of previously developed land, albeit one currently allocated Metropolitan Open Land status, as well as containing a local listing for historical significance. Due to their allocation as MOL, they were not considered for inclusion in the Site Allocation DPD.

9.2 Reasons for selecting the alternatives dealt with

9.2.1 While the filter beds site could be left as it currently is, it is not a particularly positive neighbour to Alexandra Palace Park, and there exists an opportunity to create an improved connection between Wood Green and the rest of the borough through the Penstock foot tunnel. If it were to come forward for development, there would not be a policy to guide it, it would simply be determined on its planning merits as a brownfield site within MOL. Allocating it has the potential benefits of improving connections between Wood Green and the west of the borough.

9.2.2 The following alternatives have been appraised:

Option 1 - Do not allocate the Hornsey Filter Beds for redevelopment

Option 2 - Allocate the Hornsey Filter Beds for redevelopment

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 8.1: Summary appraisal findings: Hornsey Filter Beds

Relevant sustainability topics	Option 1	Option 2
Crime	=	
Education	=	
Health	=	
Housing	2	1
Community Cohesion	=	
Economic Growth	=	
Economic Inclusion	2	1
Town Centres	2	1
Biodiversity	=	
Townscape and Cultural Heritage	=	
Open Space	2	1
Soil and Land Quality	=	
Flood Risk and Climate Change	=	
Air Quality	=	
Energy and Carbon	=	
Sustainable Transport	2	1
Noise	=	
Summary		
It is adjudged that there are significant regenerative benefits of allocating the Filter Beds site, including improving access to jobs, increasing new homes, and improving the surrounds of the existing reservoir		

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

- 9.4.1 The preferred option is to include the Hornsey Filter Beds as a site allocation, as it will improve connectivity between the west of the borough and Alexandra Palace, and Wood Green. This will offer benefits to both the new residents of Wood Green, and of the west of the borough. There is also the opportunity to improve the surrounds of the existing reservoir to the north of the site, potentially creating a biodiverse area surrounding it.

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

10 INTRODUCTION (TO PART 2)

10.1.1 This part of the report presents an appraisal of the Wood Green AAP as it currently stands, i.e. as presented within the current 'proposed submission' document.

11 APPRAISAL OF THE DRAFT PLAN

11.1.1 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.

11.2 Methodology

11.2.1 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

11.2.2 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.

11.2.3 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.

11.2.4 It is important to note that effects are predicted taking into account the criteria presented within Schedule 1 of the SEA Regulations.⁹ 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.

⁹ Environmental Assessment of Plans and Programmes Regulations 2004

11.3 Crime

- 11.3.1 Crime rates are relatively high across the borough and crime is particularly prevalent in Wood Green Metropolitan Centre. 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.
- 11.3.2 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. **WG 05** includes requirements on urban design and character and seeks to create legible neighbourhoods, and having active frontages which may assist in creating safe, modern and high quality places.
- 11.3.3 Furthermore, as noted above, the scale of regeneration proposed should indirectly lead to reductions in crime and fear of crime. It is recognised that the DM Policies DPD includes Borough wide requirements to design out crime.
- 11.3.4 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 Wood Green. However the significance of this effect is uncertain.

11.4 Education

- 11.4.1 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.
- 11.4.2 Part of the Corporate Plan's vision for Haringey is that Every child and young person is able to attend a good or outstanding school or early years setting and this AAP responds to this, by ensuring that there is sufficient capacity to cater for additional growth. The 2016 School Place Planning Report identified a projected need by 2025 for 1.5 new forms of primary school entry in the greater Wood Green area. Additionally, there is forecast to be an unmet 0.5 new form of primary school entry need in the greater Haringay area. On this basis a new 2 form of entry primary school is proposed in the southern Clarendon Rd site (WGSA 24). This site is ideally located in the zone more suitable for family housing, and can meet need in both the greater Wood Green, and greater Haringay areas.
- 11.4.3 Additionally the 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.

11.4.4 **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.

11.5 Health

11.5.1 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. Pockets 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 Wood Green are identified as having a potential negative impact on health and wellbeing.

11.5.2 There is projected deficit in the Wood Green area totalling 3,755 people due to the anticipated retirement of current single handed GPs. Additionally, new development is forecast to increase the population of Wood Green by 10,785. This creates a need for an additional 8 new GPs, 8 new C&E rooms, and 3 new treatment rooms. This equates to a floorspace of 1,011m². Site Allocation WG 11 provides for this to ensure there is sufficient health capacity. Policies within the AAP including Green Grid also seek to boost the populations overall health by promoting walking and cycling, and through the delivery of a network of interconnected open spaces to provide for easier access to recreation spaces and to help reduce pollution. Within the DM Policies, there is a Policy to help restrict the number of hot food takeaways, and to encourage the provision of new open space and sports facilities.

11.5.3 **In conclusion**, the plan is likely to result in **significant positive effects** on the health baseline as a result of 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.

11.6 Housing

11.6.1 There is a need to provide greater choice, quality, quantity and diversity of housing across all tenures to meet the needs of residents. 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).

- 11.6.2 Wood Green and Tottenham Hale have both been identified growth areas in the Local Plan and it is anticipated that these areas will deliver the majority of the housing in the borough in the next 15 years, with Wood Green currently demonstrating an indicative minimum capacity to deliver nearly 7,700 housing units up to 2026. The area contains a relatively high proportion of one person households (36.4%), the majority of which are under 65 which directly relates to the units being delivered.. Future development, given the areas highly accessible location and urban setting will likely increase the number of smaller households within this area. Of the 3,477 households in the area, a significantly lower proportion are owner-occupied households (27.8%) compared to London (48.3%) or England (63.3%). This is reflected in the economic characteristics which highlight the area has some more deprived wards than the national average and so lower household incomes.
- 11.6.3 With regard to **overarching policies**, the policy **WG 02** requires development proposals to demonstrate how they provide a range of types and sizes of homes as well as to create mixed and balanced communities.. The housing policy repeats the 7,700 homes target and the aim of contributing to mixed and balanced communities. It clarifies requirements with regards to affordable housing, densities and viability. All of the site allocations involve residential development. This section of the AAP highlight indicative capacities for the number of homes to be provided on key sites as well as specific design requirements.
- 11.6.4 **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.
- 11.7** Community cohesion
- 11.7.1 Wood Green's population is very diverse. The study area contains a low proportion of people of a white ethnic background (57%) when compared to London (60%) and England (85%). Interestingly, the 2011 census showed that the largest ethnic group of Noel Park ward was Other White, 27%, followed by 25% White British, demonstrating the significant Turkish and other European and Middle Eastern communities in the area.
- 11.7.2 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.

- 11.7.3 The level of regeneration proposed, supported by the **overarching town centre 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 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. WG Policy 9 supports and seeks new and replacement community facilities which can aid in community cohesion, alongside policies on employment and housing to help deliver improved job opportunities and access to a suitable range of housing for both new and existing residents..
- 11.7.4 **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 Wood Green 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.
- 11.8** Accessibility
- 11.8.1 There is a need to improve access to essential services and amenities for all groups, including cultural, health, leisure and educational facilities. The level of planned growth in Wood Green means a need for development of more health and educational infrastructure.
- 11.8.2 The Wood Green Urban Design Framework (WG5) Policy should improve accessibility for people living in this area to a range of services and amenities through the creation of new legible laneways and civic spaces. The Green Grid policy **WG8** should also improve accessibility for those living near it, as well as access to the Borough's network of green and open spaces.
- 11.8.3 Additionally given the AAP area predominantly covers Wood Green Metropolitan centre the site allocations to provide new community infrastructure are inherently accessible given the locations excellent accessibility from the rest of the Borough, and will help to ensure residents both within the area and from further afield can easily access new services and facilities. The AAP also provides for the potential accommodating of a crossrail station at two locations within Wood Green Metropolitan Centre, further giving greater access to the area and improving connections with the rest of London.
- 11.8.4 Policy **WG11** includes a range of requirements to ensure 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.

- 11.8.5 **In conclusion**, the plan is likely to result in **significant positive effects** on the accessibility baseline due to significant coverage of accessibility, particularly through redevelopment and crossrail. The level of regeneration proposed, including 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 and that crossrail is ultimately delivered into the area to provide additional capacity to support the high levels of growth.
- 11.9 Economic growth**
- 11.9.1 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 Wood Green will come primarily from retail and leisure, the creative sector, and new office provision for SME's unlocked by the area's regeneration plans.
- 11.9.2 While many of the **policies** relate to the broader regeneration of Wood Green, the policies that most explicitly contributes to economic growth are **WG1** which seeks to support new retail floorspace and define areas for certain leisure and retail uses, to bolster the town centres status, and **WG3** which provides support for new employment premises within the area including affordable worksapce. The Local Plan within the Strategic Policies also supports enabling mixed use schemes on sites where viability issues inhibit employment development, as well as a future role for Wood Green as a primary retail and leisure destination with a rejuvenated office market
- 11.9.3 As all of the **site allocations** 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
- 11.9.4 **In conclusion**, the plan is likely to result in **significant positive effects** on economic growth due to the large scale residential, retail 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.

- 11.10** Skills and training
- 11.10.1 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.
- 11.10.2 Part of the **objectives** for Haringey is that new schools provided by way of site allocations in Wood Green act as a focal point for local community life. Skills and training are addressed in the **AAP policies**, including **WG9** dealing with infrastructure requirements including supporting new schools on the relevant site allocations. 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.
- 11.10.3 There are no explicit references to skills and training in the **allocations** 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.
- 11.10.4 **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.
- 11.11** Economic inclusion
- 11.11.1 There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses. Wood Green has a slightly lower percentage of people working in highly skilled managerial and professional occupations at 34% compared with 37% in London. It also has a higher than average proportion of people in low skilled elementary occupations at 13.6% compared to London at 9.6%.
- 11.11.2 Wood Green is expected to meet around 4,000 of the London Plan's forecast growth of 12,000 new jobs in the Borough by 2026 including delivering up to 80,000m² of new employment floorspace. The AAP allocations contain provision to meet much of this floorspace demand. Policies including **WG3** 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.

- 11.11.3 Accessibility to jobs in and around Wood Green should be supported by the redevelopment of both retail floorspace and intensification of employment sites, designation of new areas for night time and leisure uses along with its 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 Strategic Policies and DM Policies DPD.
- 11.11.4 **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.
- 11.12** Town centres
- 11.12.1 Wood Green is identified as a Metropolitan Centre with a floorspace of 106,000 sq. M.. As the main shopping destination within the Borough, Wood Green has the best prospects for attracting investment and large scale retail development, therefore the floorspace projections for Wood Green could be viewed as a minimum, recognising there may be opportunities to concentrate and redirect future growth in the Borough.
- 11.12.2 The AAP sets how Wood Green will contribute to supporting growth and regeneration in Wood Green over the plan period and continue to fulfil its role as a Metropolitan Centre. The AAP recognises, and sets out policies to ensure, that Wood Green retains its distinctiveness and offer whilst broadening its leisure and night time economy offer, as well as attracting new, larger retailers so as to complement the retained retail offer and not detract from those businesses which are thriving.
- 11.12.3 The **site allocations** seek significant redevelopment of a number of key sites, including the large Wood Green Mall, Iceland, High Road properties and Mecca Bingo. This will bring wholesale change to the retail offer within the centre, and gives the opportunity to deliver large floorplate stores and smaller independent shops to meet Wood Green's future potential, especially in light of a potential Cross Rail station and increased footfall within the area as a result. This will therefore bring a significant amount of investment into the centre, and consolidate the Metropolitan centre's status.

- 11.12.4 **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 significantly redevelop a number of key sites will ensure that the needs of existing and new residents in this area can be better met and that a critical mass of key retailers remains or locates within the centre to enable it to compete against other large centres within and outside of London. Research has indicated that the expansion of Wood Green’s retail offer is necessary to support expected levels of growth, and would not detrimentally impact on the existing businesses.
- 11.13 Biodiversity**
- 11.13.1 Wood Green has a number of open spaces, most of which are located around the edge of the AAP area. The most prominent are Wood Green Common and Duckett’s Common, which both are located proximate to the Town Centre, and are open spaces of a significant scale. Nightingale and Trinity Gardens, along with the New River reserve and former rail line stretching between Station Rd and Park Avenue create a contiguous network of green spaces in the north of the area. There are large, high quality open spaces close to the AAP area in the form of Alexandra Palace, White Hart Lane Recreation Ground, Lordship Rec, and Downhills Park. Other smaller, but locally significant open spaces in the wider Wood Green area include Russell Park and Belmont Recreation Ground. Biodiversity within the area is however limited due to it’s predominantly urban, built up nature within the AAP Boundary, and so increasing opportunities for access to nature in nearby areas is integral.
- 11.13.2 None of the **policies** refer to biodiversity explicitly, but the Green Grid policy **WG8** seeks to support the creation of a new links through Wood Green between Wood Green Common, Nightingale and Trinity Gardens and the New River Reserve. The links will include high quality landscaping and is envisaged as a bold green infrastructure investment; thus it is assumed this could create some biodiversity value.
- 11.13.3 With regard to **site allocations**, many include requirements for new and enhanced public spaces which could potentially create significant new biodiversity value if designed and managed for this objective.

- 11.13.4 **In conclusion**, the impact of the plan on biodiversity is unclear at this stage. An expanding population and new development is likely to place increasing pressure on existing green spaces and biodiversity. Increased use of existing parks 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 between other open spaces across Wood Green, and development and enhancement of some pocket parks. However the design of the former (and thus its value for biodiversity) is not 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 Wood Green area.
- 11.14** Townscape and cultural Heritage
- 11.14.1 The AAP area is home to 11 Listed buildings, and includes or is adjacent to four Conservation Areas. St. Michael's Church, the War Memorial within Trinity Gardens, and 7&9 Bounds Green Rd have significance when considering development opportunities in the north of the AAP area, and the two Charles Holden-designed tube stations at Wood Green and Turnpike Lane stations are also proximate to development sites. Key Conservation Areas influencing the AAP are Wood Green Common, Trinity Gardens, and Noel Park. Wood Green Common includes the Common itself, and a number of characterful buildings surrounding it, dating to the Victorian period. Trinity Gardens covers much of the northern part of the AAP area, and forms a number of interlinked open spaces, with an eclectic parade of residential buildings on the north of Trinity Gardens. The Noel Park estate lies to the immediate east of the AAP area, and some buildings within the AAP area were constructed as part of the estate, including some High Rd frontages. The Alexandra Palace and Hornsey Water Works and Filter Beds Conservation Areas lies across the railway line to the west, but will be important factors in determining how the AAP developments forge a relationship with areas to the west.
- 11.14.2 Key issues therefore relate to preserving or where possible enhancing buildings and areas of architectural and historic interest.

- 11.14.3 There are several policies dealing with townscape/cultural heritage in the **overarching policies** including **WG7** (Heritage), **WG5** (Urban Design Framework) and **WG6** (Local Tall Buildings and Views). 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 in the DM Policies DPD.
- 11.14.4 The 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 SA1 LBH Civic Centre which is locally listed and adjacent to three listed buildings/structures, and includes detailed commentary regarding preserving and enhancing these heritage assets through redevelopment, and respect the prevailing form and massing of the area including preserving views of these buildings.
- 11.14.5 **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 WG7.
- 11.15** Open space
- 11.15.1 There is a need to deliver a network of high quality, accessible open spaces across Wood Green. Wood Green has decent existing accessibility to the wider natural environment however given the scale of development proposed, this will need to be enhanced whilst securing the most open space viable from redevelopment sites, including pocket parks and vicic spaces. Tree Planting and other measures will aid in the joining up of open spaces through the Green grid programme.
- 11.15.2 The AAP includes an aim to create an interconnected Green Grid to link Wood Green's network of open space, which is set out in policy. The Green Grid policy **WG8** seeks to support the creation of a new links between Wood Green's existing open spaces particularly the creation of a new links through Wood Green between Wood Green Common, Nightingale and Trinity Gardens and the New River Reserve. This will include high quality landscaping and is envisaged as a bold green infrastructure investment.
- 11.15.3 Site allocations include requirements for new and enhanced public spaces including a podium level open space for the public on the bus depot site, and at SA18: Calreendon Road where there is a current deficiency of open space.

- 11.15.4 **In conclusion**, potential positive effects include the formalisation of a Green Grid with improved links to existing parks including the vast Alexandra palace and other open spaces across Wood Green, 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 Wood Green. Robust implementation of the proposed open space policy in the DM Policies DPD should help to manage and mitigate this risk.

Water resources

- 11.15.5 The area has a rich hydrological system connected with higher ground to the west where many brooks, streams and rivers originate. The Moselle River, Lesser Moselle, New River (old and new course) and Muswell Stream flow through Wood Green and Pymmes Brook flows to the north (in LB of Enfield) and Bounds Green Brook flows to the north-west along the borough boundary with Barnet and Enfield. Unfortunately many of these water channels are culverted or inaccessible, so unnoticeable to the pedestrian. There are source protection zones, which protect two drinking water extraction sites in Haringey. This includes the North London Artificial Recharge wells in Wood Green. Therefore protection of this asset is important, alongside exploring opportunities for deculverting and reducing surface water run off as part of Wood Green is in a critical drainage area.
- 11.15.6 There are no explicit references to water resources in the **policies** but is clear that the substantial growth in population and business planned for in Wood Green will place greater demands on water supply and waste water infrastructure. Policies with regards to managing development and flood risk and surface water run off attenuation are contained within the DM Policies document.
- 11.15.7 Development of the Green Grid offers opportunities to deculvert and improve the ecological value of waterways, particularly along the New River where access could be opened up.
- 11.15.8 The Site Allocations where necessary seek to explore options to deculvert rivers, and include criteria to ensure flood risk is not increased. WG18 includes specific requirements to explore deculverting of the river through the site. 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.

- 11.15.9 **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.
- 11.16** Soil and land quality
- 11.16.1 The majority of development proposed in Wood Green is on brownfield land. Haringey's industrial history has left a legacy of contamination. Haringey's Contaminated Land Strategy identified potentially contaminated sites in the borough. The Greater London Authority has identified 29 Previously Developed Land (PDL) sites in Haringey, which cover 84.9ha of land. The vast majority (86%) of PDLs is already allocated for development or has planning permission with only 2% of sites without planning permission. Sites with vacant or derelict buildings account for the remaining 12% of Haringey's PDL. Certain sites may therefore need to explore land decontamination, and this is flagged up within relevant site allocations.
- 11.16.2 There are no explicit references to these issues in the **policies**, but it is clear that the majority of development proposed in Wood Green is on brownfield land. The need to address risks from land contamination is highlighted in the DM Policies DPD.
- 11.16.3 **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.
- 11.17** Flood Risk and climate change
- 11.17.1 The main source of flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. Wood Green lies within a Critical Drainage Area, and has areas at risk of flooding (Zone 2+)
- 11.17.2 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.
- 11.17.3 In the **site allocations** section the site allocations, where relevant, highlight the need to consider flood risk and, where appropriate, to submit a Flood Risk Assessment.

- 11.17.4 **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 Wood Green, much of which is in Critical Drainage Areas. Consequently new development in the area could exacerbate flood risk (to occupiers and/or to other buildings. 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 Wood Green area.
- 11.18** Air quality
- 11.18.1 There is a need to improve local air quality, including through measures to reduce car use such as encouraging businesses to produce green travel plans. The High Road 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.
- 11.18.2 There are no explicit references to air quality issues in the **overarching policies**; however **WG11** seeks to support more sustainable transport movement in Wood Green and the Borough, in part, to improve the health and well-being of Haringey's residents. The policy responds to issues raised in the Scoping Report, which noted that poor air quality is primarily linked to major roads and therefore the council should consider highlighting the need to facilitate public transport accessibility and encourage walking and cycling as part of the AAP policy.
- 11.18.3 **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.
- 11.19** Noise
- 11.19.1 There is a need to minimise the impact of the ambient noise environment on quality of life. However, there is no suitable baseline data available for this issue.
- 11.19.2 There are no explicit references to noise issues in the policies. However the Council seeks to address this issue by controlling pollution and nuisance from new development, as well as nuisance from existing uses and from road traffic, by safeguarding the amenities of neighbourhood and quality of life for local people via other Local Plan policies. The Council also encourages the reduction of the adverse effects of traffic by encouraging more sustainable forms of transport such as walking, cycling and public transport through the Haringey Walking Plan and Cycling Action Plan and the Haringey Cycle Route Network, where minimal noise is created from both these activities.

- 11.19.3 Certain site allocations (e.g Mecca Bingo WG SA5) refer to the need to reduce noise pollution on site.
- 11.19.4 **In conclusion**, the impact of the plan on noise relative to the baseline of 'no plan' is considered to be intangible given the limited coverage of this issue in the AAP. 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.
- 11.20** Energy and carbon
- 11.20.1 There is a need to minimise energy use and increase energy efficiency and use of renewable energy. There are considerable opportunities, given that Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in Wood Green and other areas. The Strategic Policies and DM Policies DPD set out borough-wide approaches and policies for energy use and carbon reduction.
- 11.20.2 The AAP includes an emphasis on facilitating delivery of a decentralised energy network, including through overarching policy **WG 09** (Community Infrastructure).
- 11.20.3 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 provides that future development should be considered having regard to a Council approved decentralised energy masterplan.
- 11.20.4 **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, 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.
- 11.21** Waste management
- 11.21.1 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.
- 11.21.2 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.

- 11.21.3 With regard to the site allocations, **WG SA22** (Western Road Depot) 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.
- 11.21.4 **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.
- 11.22** Sustainable transport
- 11.22.1 Wood Green is well served by public transport. This includes underground stations at Wood Green and Turnpike Lane servicing the Picadilly line for easy access to the West End and, via King's Cross, destinations across London. Alexandra Palace and Hornsey rail stations provide regular services to Moorgate via Finsbury Park, Highbury & Islington and Old Street. There are also 12 bus routes operating on Wood Green High Road. Further investment in transport infrastructure, including Crossrail 2 (although yet to be confirmed) will further enhance this. Currently cycling only forms a small proportion of all journeys. More and better infrastructure is needed, particularly to address issues relating to improved walking and cycling routes, promoting the use of public transport and reducing the use of private cars.
- 11.22.2 There are public transport upgrades and investment planned across Wood Green, including the potential delivery of Crossrail 2. The DM Policies DPD contains important strategic policies that will apply to Wood Green. Within the AAP the **overarching policies** also include a clear focus on transport issues through **WG 11** (Transport) as well as **WG 05** (Urban Design Framework), the latter of which provides for a new principal East-West route linking Noel Park with Alexandra Palace and a new North-South route through the Heartlands. **WG 09** (Green Grid / New Urban Spaces) also provides for new and improved walking and cycling routes, as well as improved access to the Borough's network of open spaces.
- 11.22.3 The site allocations highlight sustainable transport opportunities including requirements to help facilitate delivery of Crossrail 2, new and improved principal routes through Wood Green and better pedestrian and cycle friendly access (e.g. the Green Link). Some site allocations also refer to the need to minimise parking provision due to excellent local public transport connections.
- 11.22.4 **In conclusion**, the plan is likely to result in positive effects on the sustainable transport baseline through the overarching strategic policies and supporting detailed requirements in the site allocations. These seek to optimise opportunities for further improving access both through and within an area which already benefits from good public transport accessibility. It will be important to ensure coordinate development with cross-borough sustainable transport projects such as the proposed Cycling Superhighway 1 running from Wood Green into the City of London.

- 11.23** Overall conclusions and recommendations
- 11.23.1 The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with ‘significant’ positive effects identified as likely in terms of: health, housing, community cohesion, accessibility, town centres and economic growth.
- 11.23.2 A potential negative effect (relative to the baseline of ‘no plan’) is identified on flood risk, though the significance of the effect is uncertain. Flood risk policy in the DM Policies DPD should mitigate this effect to a large extent.
- 11.23.3 It is also important to point out that, whilst positive effects are generally predicted in terms of socio-economic issues/objectives, some risks are also highlighted. Specifically, there is a risk that development consistent with the proposed plan policies could lead to some disruption to existing communities. There is also a risk that some existing business sectors could be impacted by the policy focus on employment site renewal.
- 11.23.4 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)?

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- 12 INTRODUCTION (TO PART 3)
- 12.1.1 This part of the report explains next steps that will be taken as part of plan-making / SA.
- 13 PLAN FINALISATION
- 13.1.1 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 what changes to the plan are necessary, before publishing a final – Pre-submission version for consultation. Following this, comments again will be summarised, and any changes necessary to make the plan sound will be summarised. 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).
- 13.1.2 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’*.
- 14 MONITORING
- 14.1.1 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 wood green;
 - the effect of new housing on existing communities / community cohesion;
 - the legibility of historic character;
 - environmental improvement measures implemented; and
 - use of green spaces.

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.

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(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...	
(c) the environmental characteristics of areas likely to be significantly affected;	... 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.	
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;		
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the appraisal findings at this current stage?</i> [Part 2 of the SA Report]
(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;	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> [Part 3 of the SA Report]
(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	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>
(i) a description of the measures envisaged concerning monitoring.	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 'baseline'?</i> i.e. answer - <i>What are the key issues & objectives?</i> i.e. answer - <i>What's the scope of the SA?</i>
	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
	Environmental characteristics of areas likely to be significantly affected	
	Key environmental problems / issues and objectives that should be a particular focus of appraisal	

APPENDIX II - REGULATORY REQUIREMENTS (2)

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

Regulatory requirement	Discussion of how requirement has been met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	('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 ('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;	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.
	With regards to explaining 'how... considerations have been taken into account' -
	This report explains how/why understanding of the issues that should be a focus of alternatives appraisal was refined subsequent to consultation/SA in 2016.
	This report explains, 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 2016.
	This report also explains 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.
	This report ('Appraisal of the draft plan') explains how/why the preferred approach has evolved subsequent to consultation/SA in 2016.

<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>	<p>This report presents 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).</p> <p>This report ('Appraisal of the draft plan') presents the appraisal of the draft plan.</p> <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>At the current time, this report ('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>This report deals 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, this report explain the Council's 'reasons for selecting/developing the preferred approach' in-light of alternatives appraisal. 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>This report 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>At the current time, the SA Report is published alongside the plan, under Regulation 18, so that representations might be made .</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 SA Scoping Report alongside consultation responses received, when finalising the plan for publication. Appraisal findings presented within this current SA Report will inform further changes to the plan prior to pre-submission consultation.</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.
- 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.

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**.
- 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.
- A site allocation is made for the expansion (underway) of the Harris Academy in Wood Green, and increased provision as part of the Northumberland Park Masterplanning area, to meet need in these growth areas.

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 a Corporate Plan, ‘Building a Stronger Haringey Together’. One of the priorities is: “Empower all adults to live healthy, long and fulfilling lives.”
- 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 Wood Green 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 Wood Green means a need for development of more health infrastructure.

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 2015-2020 sets out Haringey’s approach to housing over the next five 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’.**
- 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 2015-20).
- Affordability of housing is a significant issue in Wood Green. Over 60% of all social housing in the borough is located in the Wood Green wards and 36.9% of the

population in Wood Green live in this housing. High levels of homelessness and overcrowding are also key issues.

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.**
- Wood Green 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 Wood Green. **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.**

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.**
- 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 Wood Green means a need for development of more health infrastructure.

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.
- 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 Wood Green 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.**

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.
- 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.

Economic inclusion

- The London Plan notes that 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.

- There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses. Wood Green has some of the highest levels of unemployment in London and England, particularly amongst young people.
- **Wood Green 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**

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.
- Wood Green has three shopping areas, Wood Green, Bruce Grove and High Road West; these line the 3.2km long Wood Green 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.

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.
- The Lee Valley Regional Park straddles the eastern boundary of Wood Green 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 Wood Green and much of the area generally lacks access to the natural environment.

- The Thames River Basin Management Plan (RBMP) contains data on aquatic ecology and biodiversity and can be used for indicators for ecological status and chemical status. The RBMP also provides a greater level of detail as to the element that a particular waterbody is failing on. The extent of new/existing buffer zones preserved, length of watercourses deculverted/restored, area of new habitat created should be considered as indicators for enhancing biodiversity.

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.
- Wood Green 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 Wood Green 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.

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 and part of Bounds Green Ward have some of 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.
- There is a need to deliver a network of high quality, accessible open spaces across Wood Green. Wood Green has a severe problem with a lack of accessibility to the wider natural environment. The Lee Valley Regional Park straddles the eastern boundary of Wood Green although access is a significant problem.

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.
- 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).
- The Thames River Basin Management Plan (RBMP) provides baseline data for assessing groundwater quality.

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.**
- The majority of development proposed in Wood Green is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Wood Green which may need to be remediated before development.

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.
- The main source of flood risk within the borough is the River Lee, and also from surface water and groundwater flooding. Wood Green has more than 50% of the ward lying within Flood Zone 2.

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'.**
- 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.

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.
- 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.

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

2008¹⁰. 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.
- There are considerable opportunities, given that Haringey is planning to develop a decentralised energy network to supply energy efficiently to buildings in Wood Green and other areas.

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.
- 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.

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.**
- **Wood Green has some of north London's best transport links with the Piccadilly 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 Wood Green Tube, rail and bus stations 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.

¹⁰ 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.

APPENDIX IV - EQUALITIES AND HEALTH IMPACTS

As explained within Chapter 3 (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) 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'.

- 1 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.
- 2 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), the aap seeks to provide a strong and healthy communit' through measures such as improved health care provision, the creation of a green grid, and increasing the supply of homes. Local Plan policies require that development proposals demonstrate how they have proactively responded to the vision and regeneration objectives for wood green, including to improve the quality and supply of housing to meet housing needs and improve health and wellbeing.
- 3 Education is an important broad issue, recognising that: although levels of education are improving in the borough, certain groups, including those with the protected characteristics, can face greater barriers to educational achievement than others, e.g. Children who have special education needs and/or disability tend to have lower levels of attainment; as a general rule children and young people who live in the more deprived areas of haringey have lower levels of attainment than their more affluent peers (particularly the case for children from black and other ethnic minority groups and children who are eligible for free school meals); children from gypsy rome and irish traveller backgrounds often have low levels of attainment in haringey schools, although their numbers are quite small; and whilst post-16 attainment in haringey is improving. The AAP provides allocations to deliver a new 2 form entry primary school with provision for further expansion.

- 4 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 wood green could indirectly lead to reduced crime / fear of crime in the medium term through creating more high quality environments and more stable communities. Policy 05 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.
- 5 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 02 also sets out that proposals will be expected to maximise the range of types and sizes of homes as well as to create mixed and balanced communities.
- 6 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, wood green, wood 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), wood green is expected to meet the provision for a substantial portion of the london plan's forecast growth 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.

- 7 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. Support for regeneration through the wood green 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 wood green.
- 8 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 AAP area. Further accessibility issues will arise with future population growth, especially around wood green and haringey heartlands, The wood green aap includes 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 FOR WOOD GREEN

Introduction

Chapter 5 (within 'Part 1', above) presents summary appraisal findings in relation to the following spatial strategy alternatives which were consulted upon in the Issues & Options consultation which was held in January-March 2016:

- Option 1 – High Rd rejuvenation
- Option 2 – Residential led town centre
- Option 3 - Comprehensive redevelopment
- Option 4 – Complete transformation

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.¹¹ 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.

¹¹ Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations 2004

Appraisal findings

Topic	Discussion	Opt 1	Opt 2	Opt 3	Opt 4
Crime	<p>Crime is moderately high in Wood Green with many residents concerned about safety and high crime rates.</p> <p>There is very little potential to differentiate between the alternatives. Options 1 & 2 (generally lower levels of redevelopment) might mean that there is a risk of some regeneration opportunities at Wood Green not being fully realised, but there is no certainty in this respect.</p> <p>Options 3 & 4 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. All major planning applications will be scrutinised for conformity with the Designing Out Crime framework.</p>			=	
Education	<p>Educational attainment in Wood Green 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 Wood Green Green/ Seven Sisters as having an important education function.</p> <p>Each option provides for the necessary uplift in education capacity relevant to the uplift in housing capacity identified. In the higher options there is greater scope for securing apprenticeships through the increased development, however this is not considered to be a significant educational effect/ this benefit will be picked up in the skills & training criteria.</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 Alexandra Palace Park, with a view to ensuring good access to high quality open space, but in this respect the alternatives perform similarly.</p> <p>All 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. As such all spatial strategy options would support significant positive effects.</p>			=	
Housing	The Options increase in ambition as they increase in number, including the creation of additional new housing, and therefore affordable housing. While in the more ambitious options (3&4) there is some requirement to demolish existing housing stock, they still create higher net housing numbers,	4	3	2	1 
Community Cohesion	Higher growth options would involve large scale regeneration of Wood Green with the potential to affect community cohesion, both positively and negatively. This could be positive, for example by creating integrated, mixed-tenure developments; enhancing the existing town centre and improving open space provision and access.			?	

Topic	Discussion	Opt 1	Opt 2	Opt 3	Opt 4
	<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 redevelopment to occur. 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 Options 3 & 4 would involve an increased emphasis on redevelopment / change within North Wood Green. However, it is not possible to differentiate with any certainty.</p>				
Accessibility	<p>Access to cultural and leisure facilities and to essential services (banking, health, education) varies between neighbourhoods. The principle of improving services, and connections within Wood Green is common to all of the options. This benefit will increase with increased interventions, with new development effectively funding accessibility improvements around, within, and to and from the centre. The relocation of Council services to the centre of Wood Green will also mean that it all 4 options improve access to Council services.</p>	4	3	2	1
Economic Growth	<p>High and increasing unemployment is perhaps the greatest challenge facing the borough; Wood Green has some of the highest levels of unemployment in London and the UK.</p> <p>While more ambitious options would generate more new employment opportunities in Wood Green (relative to the baseline 'no plan' scenario), there would also be some losses and/or disruption to existing businesses in all options, due to the redevelopment of Haringey Heartlands.</p>	4	3	2	1
Skills and Training	<p>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. Greater levels of development will provide greater opportunities to unlock funding for skill and development.</p>	4	3	2	1
Economic Inclusion	<p>Physical accessibility to jobs should be enhanced as part of the regeneration in Wood Green anticipated under all options, including through new employment opportunities and improved transport links.</p> <p>However the lower growth options may fail to create new jobs at a level and type significant to offset the sectoral split of replacing industrial premises with higher density employment uses.</p>	4	3	2	1
Town Centres	<p>Both options would support the improvement of the viability and vibrancy of Wood Green's Town Centre. The growth will be larger in the more ambitious options, as the inclusion of the Mall will offer an opportunity to completely transform the town centre offer in Wood Green.</p>	4	3	2	1
Biodiversity	<p>As Wood Green is a built-up urban area, biodiversity is not a principle factor in the plan. There are ecological corridors along the rail lines in the east of the AAP area, and SINC designations within Alexandra Palace and some of the parks in the north of the Wood Green. These will generally be protected, although there is potential for some development on ecological corridors. As this is currently in a poor condition, it is considered that there may be an opportunity to make a smaller ecological corridor do more for nature, but the sustainability impacts are not clearly known at this stage. There is</p>			=	

Topic	Discussion	Opt 1	Opt 2	Opt 3	Opt 4
	not considered to be a difference between the options.				
Townscape and Cultural Heritage	Wood Green is surrounded by 3 Conservation Areas and includes a number of listed and locally listed buildings. Heritage assets have been safeguarded through the plan making process, and there is some potential for redevelopment to facilitate improvements to heritage buildings, e.g. by improving the setting of listed buildings so that their heritage significance is better appreciated.		=		
Open Space	Wood Green has a deficiency of accessibility to open space, in parts of the AAP area. It is not clear that any of the options has the potential to result in significant effects, 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 Alexandra Palace Park from the town centre. There is the potential to create some relatively small new urban spaces; however, these should not be considered as new open spaces as they will be active town centre environments.		=		
Water Resources	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 Wood Green 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.		n/a		
Soil and Land Quality	The majority of development proposed in Wood Green is on brownfield land. A variety of industrial land uses have left behind substantial contamination in Wood Green which may need to be remediated before development.		=		
Flood Risk and Climate Change	The main source of flood risk within Wood Green is from drainage/surface water flooding. It is not possible to differentiate between the alternative options in terms of flood risk. Significant negative effects are not necessarily likely under either option, given the potential to address flood risk through site allocations, masterplanning and design measures.		=		
Air Quality	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. Without detailed investigation, it is difficult to be certain regarding the merits of the alternatives in terms of avoiding traffic congestion. Wood Green is set to develop as a public transport hub, with a new Crossrail station, improved train frequencies, which should reduce the need to move about by car in the longer term.		=		
Noise	More ambitious options could potentially involve some additional mixed use redevelopment, 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.		n/a		

Topic	Discussion	Opt 1	Opt 2	Opt 3	Opt 4
Energy and Carbon	<p>Haringey is planning to develop decentralised energy networks to supply energy efficiently to buildings in Wood Green, connecting to an energy centre in the new Clarendon Square scheme.</p> <p>On this basis, there is little potential to differentiate between the alternatives. It might be suggested that each 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 efficiency of household appliances.</p>	=			
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 Wood Green. This will be centred on a central Crossrail station (with additional better facilities for buses, cyclists and pedestrians) which already has excellent transport links via National Rail and London Underground services. 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>Overall it is anticipated that all spatial strategy options would have significant positive effects on sustainable transport, and there is little potential to differentiate between the alternatives.</p>	=			
<p>Summary</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 4 would involve an additional emphasis on growth in Wood Green, 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 Wood Green would compromise the achievement of regeneration objectives at Wood Green.</p>					

APPENDIX VI – REDEVELOPMENT OF EXISTING HOMES TO INCREASE TOWN CENTRE FLOORSPACE

Introduction

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

- Alternative 1 – Redeveloping the properties at Mayes and Caxton Rd
- Alternative 2 – Retaining the properties at Mayes and Caxton Rds


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	The redevelopment of these properties will create a net uplift in the total number of residential units, and habitable rooms within the AAP area.	★1	2
Community Cohesion	There is the potential for the replacement of existing housing to have an impact on community cohesion locally. The benefits of providing new homes in a development which helps to create a higher quality route which links communities including the west and east of the borough could also create improved community cohesion in the future. As such it is not clear which option will have a more or less significant effect.	?	
Accessibility	The redevelopment of these properties will create a key opportunity to improve east-west connectivity which will make jobs and services more widely accessible.	★1	2
Economic Growth	Creating new town centre jobs will directly benefit the local economy.	★1	2
Skills and Training	While the new development will create opportunities for employment and skill growth, it is not clear that this is a significant implication above and beyond the implications set out in Economic Growth.		
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
Town Centres	No notable implications.	★1	2
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		

Topic	Discussion	Opt 1	Opt 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	No notable implications.		2
<p><u>Summary</u></p> <p>Requiring existing housing to be used to increase own centre floorspace will have a potential effect on the existing residents of the affected properties. Careful consideration to how these effects are managed will need to be had to ensure a fair and equitable approach is taken.</p> <p>There are considered to be significant economic, access, and town centre benefits to allocating the existing residences.</p>			

APPENDIX VII – CROSSRAIL STATION OPTIONS

Introduction

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

Option 1 - Two stations, one each at Turnpike Lane and Alexandra Palace

Option 2 - One station in central Wood Green

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	Option 2 will have a greater catalytic effect in terms of stimulating investment in the centre of Wood Green. Both options would stimulate development.	2	★1
Community Cohesion	No notable implications.		
Accessibility	Both options provide connectivity to the mainline rail and Picadilly Line, and as such there isn't a significant difference, although both options would add capacity to rail links locally.	=	
Economic Growth	Option 2 will have a greater catalytic effect in terms of stimulating investment in the centre of Wood Green. Both options would stimulate development.	2	★1
Skills and Training	No notable implications.		
Economic Inclusion	By improving access to, and through, Wood Green, greater numbers of people will be able to more easily reach job opportunities. There is however not considered to be a significant difference between the options in this regard.	=	
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 Wood Green, 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.	2	★1
Biodiversity	No notable implications.		
Townscape and Cultural Heritage	No notable implications.		

Topic	Discussion	Opt 1	Opt 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	Both options provide connectivity to the mainline rail and Picadilly Line, and as such there isn't a significant difference, although both options would add capacity to rail links locally.		=
<p>Summary</p> <p>Both options would lead to significant sustainability improvements in terms of accessibility, economic growth, and investment in new homes. As there is a demonstrably bigger uplift in investment in a single Wood Green station solution, this is considered to have a better overall impact.</p>			

APPENDIX VIII – REDEVELOPMENT OF HORNSEY FILTER BEDS

Introduction

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

Option 1 - Do not allocate the Hornsey Filter Beds for redevelopment

Option 2 - Allocate the Hornsey Filter Beds for redevelopment



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	The current entrance to Penstock foot tunnel from the western side is identified as a potential crime location, which creates an unsafe environment. Redevelopment enabling a straightening of the route would alleviate this.	2	★1
Education	No notable implications.		
Health	No notable implications.		
Housing	The development of this site would increase the number of new homes in the area.	2	★1
Community Cohesion	No notable implications.		
Accessibility	Improving access through Penstock foot tunnel will improve the ability of residents in the west of the borough to access new jobs and services in Wood Green, and those in Wood Green to access Alexandra Palace.	2	★1
Economic Growth	No notable implications.		
Skills and Training	No notable implications.		
Economic Inclusion	No notable implications.		
Town Centres	The improved connection has the potential to increase Wood Green's sphere of influence in the west of the borough.	2	★1
Biodiversity	This site is adjacent to a SINC, but at present does not make a significant benefit to it. Redevelopment offers an opportunity to provide complementary development for the Reservoir and parkland.	2	★1
Townscape and Cultural Heritage	The New River and Filter Beds are a locally listed structures within conservation area, and care will be needed to be taken with regards any design. Additionally the impact of development on the adjoining Alexandra Palace MOL will need to be considered. It is not considered that the	?	

Topic	Discussion	Opt 1	Opt 2
	existing use makes a particularly positive contribution to these issues, and as such it is not considered that the overall impact is known at this stage.		
Open Space	The site is previously developed land within MOL, and so any development will need to address how it impacts the openness of the area.		?
Water Resources	As the profits from any development stand to be reinvested in Thames Water's assets, this site has the potential to contribute indirectly to ensuring water security.	2	
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 improvement in access through this site has the potential to increase mode shift for pedestrian and cycling uses.	2	
<p><u>Summary</u></p> <p>The redevelopment of Hornsey Filter Beds would have significant positive effects in terms of housing, access, and the wider economy.</p> <p>Where the impacts are less certain are in relation to impact on the adjoining open space, and the filter beds and adjoining reservoir as a heritage asset. To understand these impacts fully, more detailed design will be required to ensure that appropriate mitigations are proposed.</p>			