Sustainability Appraisal (SA) of four emerging plans

Non-technical summary of four Interim SA Reports:

- The Strategic Policies Alterations Interim SA Report
- The Site Allocations DPD Interim SA Report
- The DM Policies DPD Interim SA Report
- The Tottenham AAP Interim SA Report

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1	Feb 2014	Non-technical summary of four reports: 1) The Strategic Policies Alterations Interim SA Report 2) The Site Allocations DPD Interim SA Report 3) The DM Policies DPD Interim SA Report 4) The Tottenham AAP Interim SA Report	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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INTRODUCTION

URS is commissioned by London Borough of Haringey ('the Council') to undertake Sustainability Appraisal (SA) in support of four emerging plans:

- The Strategic Policies Alterations (or 'Partial Review');
- The Site Allocations Development Plan Document (DPD);
- The Development Management (DM) Policies DPD; and
- The Tottenham Area Action Plan (AAP).

SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives with a view to avoiding and mitigating adverse effects and maximising the positives. SA for each plan is a legal requirement, stemming from the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, draft versions of each plan are out for consultation; and each has an 'Interim SA Report' published alongside, with a view to ensuring an informed consultation (and informed plan-making subsequent to the consultation).

This is a Non-technical Summary (NTS) of the Interim SA Reports. It is the intention of that this NTS should act as a 'window' into *all four* Interim SA Reports.

Structure of the Interim SA Reports / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What's the scope of the SA?
2. What has plan-making / SA involved up to this point?
   - i.e. in the run-up to preparing the draft plan for consultation.
3. What are the appraisal findings and recommendations at this current stage?
   - i.e. in relation to the draft plan.
4. What are the next steps?

WHAT'S THE SCOPE OF THE SA?

An important first step in the SA process involves establishing the 'scope', i.e. those sustainability issues and objectives which should be a focus of the SA, and those that should not. In order to establish the scope there is a need to answer a series of questions including:

- What's the sustainability 'context'?
  - Answering this question primarily involves reviewing Government's National Planning Policy Framework, and the London Plan and adopted local policy; however, it is also important to 'cast the net wider' and consider contextual messages promoted by other reputable organisations.
- What's the sustainability 'baseline'?
  - Answering this question involves reviewing available data to establish an understanding of the current and likely future state of the environment / socio-economy locally.

The following is a *brief summary* of some of the sustainability baseline issues described within the SA Report, i.e. introduced as falling within the scope of SA.

N.B. The information presented under the heading 'What's the scope of the SA?' is identical within three of the four Interim SA Reports, whilst the information presented on the SA scope within the Tottenham AAP Interim SA Report reflects the need for a focus on Tottenham specific issues.

Social issues

- Overall deprivation in the borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 13th most deprived local authority in England. There are particular pockets of deprivation such as in Tottenham Northumberland Park, Wood Green and Hornsey. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England.
- Health inequalities in Haringey are evident; with the most deprived areas in the east of the borough tending to experience the poorest health. Health inequality is most acute in Tottenham, with a nine year gap in life expectancy when compared with the rest of the borough. Also, childhood obesity rates in the borough are higher than the London and England average.
- Affordability of housing is a significant issue in the area. Just over 30% of households live in social housing, which tends to be concentrated in the east of the borough (which is more densely populated than the west). The borough also has notable levels of homelessness, with 3000 people officially in temporary accommodation.
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. Nearly half the population comes from ethnic minority backgrounds. The population in the west of the borough is predominantly 'older' than the east.
- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others.
- The percentage of Haringey residents with no qualifications (8.6%) is in-line with the regional average, but in Tottenham Hale 22.45% of residents aged 16 and over have no qualifications.

Economic issues

- When compared with the rest of London, Haringey has levels of economic growth that are below the regional average, a higher rate of unemployment and lower gross weekly pay per capita. The level of employment declined by 7.1% between 2008-10 almost double the London and national averages.
- The total number of economically active in 2011 was 65.5% with 6.1% unemployed. This compares reasonably favourably with London, where 66.5% were economically active in 2011, with 8.4% unemployed. However, Tottenham has some of the highest levels of unemployment in London.
- Haringey's economy is dominated by small businesses. 90% of the businesses employ 10 or less people. There has been a decline in industrial floorspace take-up since the 1990s, the manufacturing base has also been declining, and office space buildings are mainly second hand, older buildings.
- The borough is characterised by its polarised skills base. Around 21% of the borough's working age population has a level 1 or below qualification. Meanwhile, 40% have a level 4 or above qualification.
- Haringey's town centre vacancy rates have increased in recent years, but remain lower than national and regional averages. However, the borough's centres are not performing equally in this respect.

Environmental issues

- The borough has a total of 60 areas designated as Sites of Importance for Nature Conservation (SINCs), which vary in terms of importance/sensitivity. Haringey also has five Local Nature Reserves (LNRs) and waterways also offer a valuable habitat. The Lee Valley Regional Park straddles the eastern boundary of the borough, and is home to European designated sites and is a Site of Special Scientific Interest.
- The boroughs historic assets include 467 listed buildings of Special Architectural or Historic Interest, six Grade I buildings and 434 Grade II buildings, 1150 locally listed Buildings of Merit, 29 Conservation Areas, two Registered Parks and Gardens, 34 Local Historic Green Spaces, three Sites of Industrial Heritage Interest, and 22 Archaeological Priority Areas. Haringey has 16 Listed Buildings and 5 Conservation Areas on English Heritage's Heritage at Risk Register including the Grade II Listed Alexandra Palace. Also, the view of St Paul's Cathedral and the City from Alexandra Palace is identified in the London Plan as a strategically important Viewing Corridor.

- The Lee Valley presents a significant recreational asset, which could serve to link Haringey with developments in East London most notably the Olympic Park. Haringey also has a network of Metropolitan Open Land and Significant Local Open Land. The borough has an overall provision of 1.7 ha of open space per 1,000 of population, although there are some areas of deficiency. The All London Green Grid Framework presents an opportunity for Haringey to enhance inter-borough green corridors.
- The flood risk area (Zones 2 and 3) could potentially affect 5,000 properties. Flood risk is largely present in the east of the borough. According to the Haringey Strategic Flood Risk Assessment (SFRA), surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey, although there is also some risk from reservoir breach. Climate change effects will increase flood risk.
- The borough suffers poor air quality primarily because of traffic congestion, with the whole borough designated as an Air Quality Management Area.
- A headline message of the Haringey Annual Carbon Report is that: Between 2011 and 2012 Haringey's total carbon emissions increased by 6.9%, consistent with London-wide and national trends.
- Haringey's transport links are fairly strong, with many transport connections linking to the centre of London in minutes. Over half of Haringey households do not own a car or van (51.8%) an increase from 46.5% in 2001. This compares to 41.6% of households in London which do not have access to a car. Further investment in transport connectivity through Crossrail 2 will benefit Tottenham and the wider borough.

The SA 'framework'

Drawing on the findings of the context / baseline review, a list of sustainability objectives was identified under 21 'topic' headings. This list of topics, objectives and associated 'appraisal criteria' has been drawn-on as a methodological 'framework' for SA (i.e. for the appraisal of alternatives and the draft plan).

The SA Framework

SA topic	SA objective	Appraisal criteria *Will the policy approach under consideration help to…*
Social		
Crime	Reduce crime, disorder and the fear of crime	• 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	• 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 homes? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	• 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?

SA topic	SA objective	Appraisal criteria *Will the policy approach under consideration help to…*
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	• 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 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	• Promote a sense of cultural identity and belonging? • 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	• 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	• 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	• 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	• Improve accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?
Town Centres	Improve the vitality and vibrancy of town centres	• Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		
Biodiversity	Protect and enhance biodiversity	• Protect / enhance designated and non-designated sites? • Link and enhance habitats and wildlife corridors? • Provide opportunities for people to access wildlife and diverse open green spaces?

SA topic	SA objective	Appraisal criteria *Will the policy approach under consideration help to…*
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	• Promote townscape character and quality? • Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	• 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	• 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	• 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	• Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	• Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	• Minimise the impact of the ambient noise environment?
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	• Minimise the use of energy? • Increase energy efficiency and support affordable warmth initiatives? • Increase the use of renewable energy? • Mitigate against the urban heat island effect? • Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	• 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	• 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?

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

An important element of the required SA process involves appraising 'reasonable alternatives' in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, 'Part 2' of each of the four Interim SA Reports presents information on 'reasonable alternatives, with a view to answering the question: *What has plan-making / SA involved up to this point?'*

The approach that has been taken to alternatives appraisal is notably different across the four plans. This reflects the fact that the aims and objectives of the plans are individually distinct (albeit they all share the aim of delivering on the vision and broad strategy set out in Haringey's adopted Strategic Policies, a fact that is also reflected in the approach taken to alternatives appraisal).

Each plan / Interim SA Report is considered in turn below.

The Strategic Policies Alterations

Part 2 of the Interim SA Report explains how **alternative spatial strategies** – i.e. alternative approaches to distributing the housing quantum assigned to Haringey through the Further Alterations to the London Plan (FALP) - were appraised in the run-up to preparing 'proposed alterations' for consultation.

[N.B. The FALP requirement is 1,502 homes per annum, which equates a level of growth significantly (682 homes per annum) above that which was anticipated when preparing the adopted Strategic Policies.]

The alternatives subjected to appraisal were as follows –

Option 1 - The **2013 spatial strategy** in the adopted Strategic Policies document, with updates to selected Growth Areas / Areas of Change, reflecting new evidence on site capacity

Option 2 - **Dispersed growth** with each ward taking a roughly equal share of the additional housing (i.e. the additional 682 homes per year) above and beyond the existing spatial strategy

Option 3 - **Town centre and Crossrail 2 focused growth**, with the additional housing (i.e. the additional 682 homes per year) focused at hubs in and around all town centres and Crossrail stations.

After explaining 'reasons for selecting the alternatives dealt with', the Interim SA Report presents appraisal findings within a table that comprises 21 rows (one for each of the sustainability 'topics' established through scoping) and three columns (one for each of the alternatives under consideration). For each sustainability topic, the table both A) identifies instances where a particular option would likely lead to 'significant effects' (positive or negative) in terms of sustainability objectives; B) ranks the performance of the alternatives.

The conclusion of alternatives appraisal is as follows –

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

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

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

Part 2 of the Strategic Policies Interim SA Report then concludes with a section explaining the Council's reasons for selecting/developing the preferred approach in-light of alternatives appraisal. The Council recognises that there are a range of likely effects associated with each option, but explains why Option 1 is on balance preferred.

The Council's reasons for selecting the preferred approach are as follow –

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

The Site Allocations DPD

Part 2 of the Interim SA Report explains how **four sets of alternatives** were appraised in the run-up to preparing the 'Preferred Option' consultation document – see Table A.

***Table A**: Sets of alternatives that have been the focus of appraisal*

Plan topic[1]	Option 1	Option 2
Office uses in Wood Green	Reduction in office uses, despite high accessibility (PTAL)	Promotion of office uses prevalent, commensurate with high PTAL
Non-designated employment sites	Generally maintain employment function where PTAL is high (4+)	Generally maintain employment function where PTAL is moderate or high (3+)
Haringey Warehouse District	Allow a mix of uses including residential	Maintain as employment, reflecting employment designation
Open space	Do not allocate sites for purely open space	Seek to allocate sites as open space

After explaining reasons for focusing on these four issues, and reasons for selecting the alternatives dealt with in each instance, the Interim SA Report presents appraisal findings within four tables (see above for a discussion of how the tables are structured).

[1] When considering the 'plan topics' that should be the focus of alternatives appraisal, consideration was given to appraising alternative approaches to site allocation (i.e. alternative 'site packages'); however, it was determined that there was no 'reasonable' need to do so. The preferred site package has strong justification, having been developed through a preliminary screening exercise (discussed in the Interim SA Report), and given the need to deliver on the housing and employment targets established through the Further Alterations to the London Plan (FALP) and the broad spatial strategy established by the adopted Strategic Policies and emerging Alterations.

Conclusions of alternatives appraisal are as follows -

- **Office uses in Wood Green** - "Option 1 (Reduction in office uses) performs best in terms of a range of sustainability objectives, stemming from the suggestion that this approach will support a targeted approach to regeneration in Wood Green, leading to a diversification of uses and a situation whereby the town centre is vibrant and has a clear role to play sub-regionally. It is not thought that a decision to reduce office space in Wood Green will have negative implications from an economic growth perspective, given that there are a number of other areas locally where demand for offices is high, and the effect of regeneration in Wood Green should be to enhance the image of Haringey in general as a place to do business and invest. The draw-back to Option 1 relates to 'sustainable transport' objectives; however, there are other locations with high PTAL that are set to be a focus of office development."
- **Non-designated employment sites** - "The approach of redeveloping some existing employment locations for residential uses where PTAL is low – i.e. breaking from the general principle of seeking to increase employment density on existing employment sites – will help to achieve housing objectives, and is unlikely to hinder economic growth objectives given that these are locations where market demand for offices will be relatively low (and hence offices might not be deliverable). Furthermore, redevelopment of some sites for solely residential uses will lead to an uplift in value that enables funds to be made available for investment in local infrastructure, including walking/cycling infrastructure (thereby addressing issues around relatively low PTAL). There are potentially some draw-backs associated with the loss of employment sites though, particularly if it is the case that certain types of site / employment sector are disproportionately affected, with implications for economic inclusion."
- **Haringey Warehouse District** - "Option 1 (Allow a mix of uses including residential) is likely to lead to widespread benefits given existing issues around unauthorised warehouse living (not least around poor living environments) and the fact that supporting the creative sector is an important economic objective for Haringey. There are potentially some draw-backs – including those that relate to the loss of floorspace for traditional industries – but it is anticipated that policy measures can be put in place to mitigate effects."
- **Open space** - "There is difficulty in increasing the quantity of public open space in Haringey, which indicates the need to focus primarily on the function, quality, usage and accessibility of existing public open space (Option 1). There is good potential to apply a 'Green Grid' approach to open space access, i.e. provide a strategic interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas. Benefits of a Green Grid approach will be wide-spread, and hence 'significant positive effects' are predicted under a number of topic headings, most notably transport and accessibility."

Part 2 of the Sites DPD Interim SA Report then concludes with a section explaining the Council's reasons for selecting/developing the preferred policy approach – in relation to each of the four plan issues - in-light of alternatives appraisal. The Council recognises that there are pros and cons associated with each of the options that has been the focus of appraisal, but explains that:

- **Office uses in Wood Green** - Option 1 (*Reduction in office uses, despite high PTAL*) is on balance preferred. Priority considerations include the need to reflect higher level (London Plan) policy. The London Plan finds that Wood Green is not a preferred office location.
- **Non-designated employment sites** - Option 1 (*Generally maintain employment where PTAL is 4+*) is on balance preferred. Priority considerations include the need to ensure a viable and deliverable plan. Viability evidence shows that the types of employment Haringey can accommodate require good PTAL.
- **Haringey Warehouse District** - Option 1 (*Allow a mix of uses including residential*) is on balance preferred. Priority considerations include an understanding that a diversification of uses in this area can help create an amenity that will help to create and secure jobs.
- **Open space** - Option 1 (*Do not allocate sites for purely open space*) is on balance preferred. Priority considerations include the need to avoid any approach that would compromise the Council's ability to meet its housing and jobs targets.

The DM Policies DPD

'Part 2' (*What has plan-making / SA involved up to this point?*) explains how **12 sets of alternatives** were appraised in the run-up to preparing the 'Preferred Option' consultation document – see Table B.

***Table B**: Sets of alternatives that have been the focus of appraisal*

Plan topic	Option 1	Option 2
Housing conversions	Restricted conversion area to preserve larger and family homes	No restricted conversion areas
Housing density and design	Apply London Plan density standards, with exceptions in some circumstances	London Plan standards always applied. No higher density exceptions
Employment sites (1)	Requirement to maximise employment densities on sites	Less restrictive approach, with no specific steer for higher employment densities
Employment sites (2)	Allow introduction of non-employment uses (as part of mixed use schemes) at certain designated employment sites, to cross-subsidise and enable new employment development	Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development
Town centre uses	Set thresholds for percentage of A1 uses in primary and secondary frontages	No thresholds or different (higher/lower) thresholds for A1 uses
Negative clusters	Proactively restrict negative clusters (e.g. hot food takeaways / betting shops)	No policy - applications assessed against other town centre use policies
Tall buildings	Policy for the siting and design of tall buildings, within identified locations, taking account of site specific issues informed by Haringey's Urban Characterisation study	Less prescriptive constraints on tall buildings; relying on London Plan and Local Plan Strategic Policies
Views and vistas	Policy to minimise disturbance of identified local views and vistas	Only protect London Plan strategic views.
Heritage and conservation	Proactive approach to designated and non-designated assets, with applicants required to consider adaptive re-use	Do not apply policy to non-designated heritage assets
Car-free or car-capped developments	Limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone is in place or planned	Parking required, in accordance with the London Plan parking standards
Allowable solutions / carbon offsetting	Allowable solutions (including local carbon offsetting fund) to better enable developers to meet carbon targets	No allowable solutions (CO_2 reductions must be met on site); wait on further Government guidance
Community infrastructure	Policy to set location requirements for new / extended community facilities	No specific location requirements - accept facilities wherever proposed

Part 2 of the DM Policies DPD Interim SA Report is structured slightly differently to the equivalent Part within the two Interim SA Reports described above, in that a chapter is assigned to each of the 12 topics that have been a focus of alternatives appraisal.

Within each chapter, after explaining 'outline reasons for selecting the alternatives dealt with', appraisal findings are presented within a table (see above for a discussion of how the table is structured).

Conclusions of alternatives appraisal are as follows -

- **Housing conversions**- "A key issue is the need to deliver housing that is designed to meet the requirements of the wider population and provides flexibility and choice. On average, the number of households is expected to increase but reduce in size. There is also expected to be an increase in demand for larger homes for families with two or more children. The conversion of larger homes into smaller flats can contribute to the provision of additional housing and the mix of housing (in areas where there is a monoculture of large houses); however, it can lead to a loss of housing mix in areas where there is a mix of housing types and where there is strong pressure for such conversions and family homes are not protected. The cumulative effect of conversions can also have an adverse impact on the character of existing residential areas in terms of the intensification of use and associated issues. The policy approach under Option 1 would restrict this conversion in particular areas (presumably areas where there is most pressure on the conversion/loss of family homes). This would help retain houses for larger families while still allowing conversions in other areas, helping to sustain and create a mix of housing across the borough and support mixed communities. However it would also restrict smaller dwelling sizes being created. Not setting a conversion restriction (Option 2) may have benefits for efficient use of land and climate change (reduced carbon emissions due to more efficient use of space and improved energy efficiency), but it is unlikely that these effects would be significant."
- **Housing density and design** - "The borough is densely populated (86.2 persons per hectare; well above the London average of 52) and the population is set to increase by 31,234 over the period of 2011 to 2021. This indicates that some high density housing schemes are needed, perhaps going beyond what is recommended in the London Plan. Against this background, Option 1 is seen to perform well in terms of sustainability objectives. As well as benefits in terms housing objectives, targeted high density development in Haringey is supported in terms of 'sustainable transport', 'reducing per capita carbon emissions' and 'increasing accessibility to local jobs'. However, there are risks around access to health care and community infrastructure more generally."
- **Employment sites (1)** - "In an area that is constrained in terms of the availability of land for employment development and has high unemployment levels, intensifying the existing offer is an important priority to create more jobs for the growing population and to address historic local unemployment. Against this background, Option 1 is seen to perform well in terms of sustainability objectives, with significant positive effects predicted in terms of economic growth and economic inclusion. A risk is that if/when space for large floorspace uses is needed, there will not be the land available to accommodate these uses, but this is considered to be minor given the evidence suggesting economic growth locally is considered most likely to come from B1 development."
- **Employment sites (2)** – "Requiring mixed use redevelopment of existing employment sites to cross-subsidise an enhancement of the employment offer on the site (Option 1) will be necessary if both housing and employment growth targets are to be achieved. Office development will often come forward alongside residential development, and it should be the case that the two uses can coincide on a site without any problems, and indeed there can be benefits for local residents."
- **Town centre uses** - "The town centres in Haringey act as the focus for local convenience shopping and community facilities. Given this role, they will contribute to the vitality local communities, and also help to reduce car dependency. Protecting retail in town centres (Option 1) could help to sustain strong and vital centres in the long term; but on the other hand there are arguments to suggest that setting thresholds for A1 could constrain the success/vitality of town centres (relative to a more permissive approach, Option 2). If there is greater demand for non-A1 uses than some existing A-class uses, then a restrictive policy would act to constrain the vitality of town centres, with knock-on effects. On balance, there is insufficient evidence to judge the relative performance of the alternatives at this stage. There would seem to be merit in a (middle ground) flexible approach at the current time, given uncertainty around the future function of town centres."
- **Negative clusters** - "Overall, in terms of sustainability objectives, Option 1 is clearly best performing. No draw-backs are highlighted by the appraisal. Restricting negative clusters of hot food takeaways and betting shops would likely lead to significant positive benefits in terms of 'health', given the assumption that there would be reduced consumption of fatty foods. There would also be benefits in terms of reduced crime and antisocial behaviour, improved townscape and improved vitality in town centres."

- **Tall buildings** - "Option 1 is best performing in terms of all objectives, other than those relating to 'housing'. Option 1 would restrict tall buildings to particular areas, protecting the borough's townscape and cultural heritage, while still allowing tall buildings in some areas."
- **Views and vistas** - "Protection A policy to minimise disturbance to of identified local views and vistas in addition to London Plan strategic views (Option 1) will better protect the borough's townscape and cultural heritage resources, as compared to only protecting London Plan strategic views (Option 2). Significant positive effects are predicted in terms of townscape/heritage objectives. However, the greater protection of identified local views in addition to Local Plan strategic views could place constraints on housing delivery in some areas."
- **Heritage and conservation** - "A policy focus on non-designated assets in addition to designated assets (Option 1) is likely to result in significant positive effects in terms townscape and cultural heritage objectives, and it is not clear that there are draw-backs to this approach. There might be some negative implications for housing and economic growth, but in the long-term heritage assets can support regeneration and sense of place (with positive implications for economy and community objectives)."
- **Car-free or car-capped developments** - " Option 1 (limited or no on-site parking where there is good public transport accessibility and a Controlled Parking Zone in place or planned) is likely to have greater positive effects in terms of encouraging sustainable transport (significant positive effect), health, air quality and climate change mitigation objectives. With large scale development planned within Haringey, an integrated approach to land use and transport planning that minimises the need to travel and encourages the most sustainable travel choices could have a notable positive effect on reducing transport-related greenhouse gas emissions per capita."
- **Allowable solutions and carbon offsetting** - "A local carbon offsetting fund (Option 1) could be used to fund local energy solutions such as energy efficient retrofit of local authority housing and decentralised energy development, improving the condition and quality of local authority housing. The impact on housing could be significant if sufficient funds were captured through this mechanism, however national government may rule out such an approach in favour of a national offsetting scheme. Given that housing quality/condition and issues around fuel poverty are important determinants of health, Option 1 could also improve health outcomes and reduce health inequalities."
- **Community infrastructure** - "Community Infrastructure assets can help enable regeneration and create a sense of place and improve people's quality of life. Haringey has existing pockets of deprivation and also areas of deficiency for different types of community infrastructure, as well as new growth in the pipeline that will need supporting infrastructure. Therefore, by locating new and enhanced infrastructure in specific locations, Option 1 is more likely to benefit existing and future residents than Option 2 which could take place anywhere in the borough. No draw-backs to Option 1 have been identified."

Each topic chapter then concludes with a section explaining the Council's reasons for selecting/developing the preferred policy approach in-light of alternatives appraisal. The text is not repeated here, for brevity.

The Tottenham AAP

'Part 2' (*What has plan-making / SA involved up to this point?*) explains how **six sets of alternatives** were appraised in the run-up to preparing the 'Preferred Option' consultation document – see Table C.

***Table C**: Sets of alternatives that have been the focus of appraisal*

Plan topic[2]	Option 1	Option 2
Spatial strategy	Growth focused mostly in Tottenham Hale, Northumberland Park and High Road West	As per (1), but with some emphasis on developing the northern edge of Tottenham
Employment sites	Allow introduction of non-employment uses (as part of mixed use schemes) at certain designated employment sites, to cross-subsidise and enable new employment development	Introduction of non-employment uses within designated employment sites, with no further requirement to cross- subsidise new employment development
Town centre hierarchy	Retain / reinforce the existing town centre hierarchy, along with designating a new district centre and at Tottenham Hale	Retain / reinforce existing town centre hierarchy
Building heights	A locally specific approach to building heights, including tall buildings, in the Tottenham AAP; reflecting a more proactive approach to sensitive clustering of buildings in identified sites or areas (informed by Characterisation Study)	Apply more borough-wide development management policies for tall buildings (including in Local Plan Strategic Policies and Local Plan DM Policies)
Affordable housing	Apply an affordable housing tenure split at 60% 'intermediate' and 40% social/ affordable rented accommodation, to re-balance local housing provision	Apply an affordable housing tenure split at 40% 'intermediate' and 60% social/ affordable rented accommodation, in-line with the emerging borough-wide policy
Green link	A Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area	A Green Link between Tottenham High Road and the Lea Valley Regional Park along Dowsett Road and Park View Road

As with the DM DPD Interim SA Report, Part 2 of the Tottenham AAP Interim SA Report is structured so that a chapter is assigned to each of the six topics that have been a focus of alternatives appraisal.

Within each chapter, after explaining 'outline reasons for selecting the alternatives dealt with', appraisal findings are presented within a table (see above for a discussion of how alternatives appraisal tables are structured). For reasons of brevity, conclusions are not presented here.

Each topic chapter then concludes with a section explaining the Council's reasons for selecting/developing the preferred policy approach in-light of alternatives appraisal.

[2] When considering the 'plan topics' that should be the focus of alternatives appraisal, consideration was given to appraising alternative approaches to site allocation (i.e. alternative 'site packages'); however, it was determined that there was no 'reasonable' need to do so. The preferred site package has strong justification, having been developed through a preliminary screening exercise (discussed in the Interim SA Report), and given the need to deliver on the housing and employment targets established through the Further Alterations to the London Plan (FALP) and the broad spatial strategy established by the adopted Strategic Policies and emerging Alterations.

Specifically, the Council state that:

- **Spatial strategy** – "The preferred option promotes a balanced approach to growth and development in Tottenham, in particular, a spatial scope that includes but also extends beyond North Tottenham. This option better reflects the Council's strategic regeneration objectives for the wider area, addressing local character and responding to constraints which might inhibit development of mixed and balanced communities, and taking advantage of key public transport nodes and other existing and future planned infrastructure / investment. In addition, Option 2 would require the de-designation of strategic industrial land, which, as the appraisal indicates, is likely to have significant negative effects on economic sustainability objectives. The preferred option is therefore also better placed to accommodate the quantum of planned future growth without compromising local business and employment opportunities, which are integral to Tottenham's sustainable development."
- **Employment sites** – "There is a need to ensure that Tottenham's employment land is maximised for the benefit of the local community and borough. Fully employment led schemes may be difficult to deliver in certain circumstances, given viability considerations. Therefore, an approach which enables the introduction of more viable mixed use development to cross subsidise employment development is preferred. This approach will assist with driving forward regeneration in the area, with multiple benefits for the area. The policy will be delivered through a limited number of site allocations, in order to ensure that employment locations and floorspace are not compromised. The policy will also work in conjunction with the DM Policies DPD."
- **Town centre hierarchy** – "The preferred option is to maintain and reinforce the existing town centre hierarchy, along with the introduction of a new District Centre at Tottenham Hale. This option will help to ensure that the future growth and regeneration of Tottenham Hale is appropriately supported, whilst reinforcing the need to maintain the vitality and viability of Haringey's other existing centres. Existing and future transport improvements will also support the delivery of this alternative. Further, the option better positions Haringey to realise the potential of Tottenham Hale within London's wider town centre network, as reflected in the Further Alterations to the London Plan. The Sustainability Appraisal highlights the significant positive effects of progressing this approach, particularly on the objectives for economic growth, townscape / cultural heritage and sustainable transport."
- **Building heights** – "The preferred approach is for a specific tall building policy for the Tottenham AAP, to be considered via site allocations, building on relevant adopted and emerging Local Plan policies. This policy option will provide greater level of control over tall buildings in Tottenham, helping to ensure they make a positive contribution to the area by being appropriately situated, in particular, responding to local character and situated in areas with good transport accessibility. The policy will also provide greater certainty for prospective developers about the locations where relevant proposals will be acceptable."
- **Affordable housing** – "The preferred option is for a localised policy which is a variation on the emerging borough-wide policy for affordable housing tenure split. This option will assist in rebalancing the comparatively high levels of social rented accommodation in Tottenham, which equates to more than 60% of the boroughs' total social rented stock. It will ensure the most effective use the funding received to help meet housing needs in Tottenham. Whilst the Sustainability Appraisal has identified potential issues in respect of area change, it is considered that the full suite of Local Plan policies will help to increase the quantum, range and quality of housing in Tottenham to better meet a wide range of housing need. Further, increasing the amount of intermediate housing will meet the needs of those who traditionally may have sought social housing but are eligible for low cost home ownership products, which the Council is seeking to encourage in Tottenham. Finally, Local Plan policies should not result in a net loss of affordable housing floorspace, in line with Strategic Policy SP2 and the emerging DM Policies DPD."
- **Green link** – "The preferred option is for the introduction of a new Green Link between Tottenham High Road and the Lea Valley Regional Park through the Tottenham Hale area, passing across the northern section of the new District Centre and extending east of the axis of Chesnut road. This option will help to promote a more balanced approach to connectivity across the AAP area, with improved permeability to the Lea Valley at the southern part of Tottenham. Further, the alternative option is likely to be more difficult to deliver, with the Green Link having to address access across the A1055. With the preferred option, Chesnut Road already provides the area with a pedestrian route towards Tottenham High Road. The proposed Green Link extends the axis of this existing route directly east into the Regional Park."

WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

'Part 3' within each of the Interim SA Reports answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the draft plan as it stands at the current time, i.e. as presented within the current consultation document.

In each case the appraisal of the draft plan is presented under 21 topic headings, and then a final section presents 'overall conclusions'. The overall conclusions in relation to each plan are presented below.

The Strategic Policies Alterations

The conclusion of the draft plan ('preferred option') appraisal is as follows -

- "The proposed Partial Review is likely to lead to some significant positive effects on the baseline situation (i.e. a situation that assumes implementation of the existing Strategic Policies – see Box 14.1).

  The increased residential development is focused at the existing Growth Areas and Areas of Change outlined in the adopted Strategic Policies DPD. The scale of growth creates an opportunity for investment in infrastructure in the most deprived part of the borough, which should lead to benefits in terms of a number of sustainability objectives.

  The spatial approach also seeks to address housing affordability, improve the condition of housing for existing residents; support economic growth ambitions; and reduce the need to travel. The review is also likely to have significant positive effects for town centres across the borough; most notably at Wood Green given the scale of development and its role at the top of Haringey's settlement hierarchy.

  No negative effects are predicted, however some uncertainties are highlighted in terms of health, community cohesion, open space and air quality. Some uncertainties exist in relation to estate renewal (through SP2), which should have a positive effect through improving conditions; but which will need to be sensitively managed."

The Site Allocations DPD

The conclusion of the draft plan ('preferred option') appraisal is as follows -

- "Significant positive effects are predicted in terms of the majority of the 21 sustainability topics that have provided a framework for the appraisal. In each instance, the appraisal finds that a carefully targeted approach to site specific policy is emerging that recognises the need for individual sites to contribute to wider objectives, whether borough-wide objectives (e.g. around walking/cycling, accessibility and biodiversity) or sub-area specific objectives (notably objectives for Wood Green, Haringey Heartlands and the Haringey Warehouse District).

  Under some topic headings, whilst significant positive effects are predicted overall, the appraisal also serves to identify potential draw-backs / risks or the potential for policy to 'go further'. Most notably, with regards to economic growth and economic inclusion, whilst the effect of the plan will be to support economic growth and diversification, there are drawbacks given that some industries will find it increasingly difficult to operate in Haringey. Also:

  – Whilst significant positive effects are predicted in terms of 'crime' overall, further opportunities to design-out crime should be explored;

  – Whilst significant positive effects are predicted in terms of 'health' overall, emerging evidence around requirements for health facilities should be taken into account;

  – Whilst significant positive effects are predicted in terms of 'housing' overall, emerging evidence around Gypsy and Traveller accommodation needs should be taken into account; and

  – Whilst significant positive effects are predicted in terms of 'flood risk' overall, further consideration might be given to policy measures aimed at avoiding and mitigating risk.

  There are no instances of the appraisal concluding significant negative effects for a sustainability topic; however, there are number of instances where it is not possible to conclude significant positive effects. In several instances it is the case that policy measures are vague or absent at this stage, but there is an expectation that the next ('proposed submission') version will include policy (having further regard to the

Strategic Policies DPD and emerging DM Policies DPD). Most notably, it is not possible to conclude significant positive effects in terms of 'accessibility' at the current time, given that the Infrastructure Delivery Plan (IDP) update is yet to be finalised and feed into site specific policy requirements around community infrastructure delivery. Also, it will be important that the proposed submission version of the plan includes site specific policy aimed at ensuring that opportunities for delivering decentralised energy networks are realised."

The DM Policies DPD

The conclusion of the draft plan ('preferred option') appraisal is as follows –

- "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: education, health, housing, community cohesion, economic growth, town centres, biodiversity, townscape and cultural heritage, open space and Sustainable transport. Notable positive effects (e.g. around town centre vitality, accessibility / sustainable transport and conserving heritage assets and views) will result from a policy focus on ensuring a targeted approach to high density housing / tall buildings. There is, however, often a degree of uncertainty around predicted positive effects given the important role that will be played by site allocation policy (which in turn will be influenced by the emerging update to the Infrastructure Delivery Plan, IDP).
- No significant negative effects are predicted, although risks associated with some policy approaches – in particular policy approaches that will drive a considerable shift in the nature of employment land in Haringey, potentially with implications for economic inclusion – are highlighted. Objectives around 'energy and carbon' and 'open space' are notable in that there is the theoretical potential to do more (in order to meet carbon reduction standards; and reduce open space deficiencies), but it is recognised that in practice there is no potential to set more stringent policy without compromising other objectives, which are a priority locally (i.e. objectives around housing, regeneration and employment growth). In terms of recommendations, the appraisal highlights a small number of instances where the plan might potentially reword or elaborate on policy wording for particular sustainability issues (crime, skills and training and water resources)."

The Tottenham AAP

The conclusion of the draft plan ('proposed alterations') appraisal is as follows –

- "The appraisal presented above highlights that the draft plan performs well in terms of many sustainability issues/objectives, with 'significant' positive effects identified as likely in terms of: health, housing, community cohesion, accessibility, town centres and economic growth. Though not judged to be significant at this stage, there are also potential positive effects identified in terms of: crime, education, skills and training, economic inclusion, soil and land quality and energy and carbon emissions.

  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.

  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.

  Effects on biodiversity and open space were identified as unclear at this stage based on the evidence available. While the creation of a new Green Link to the Lee Valley Park could contribute to both objectives, the design of the this green infrastructure intervention is not yet agreed and the delivery of more green space does not appear to form a prominent part of policies or many site allocations at this stage (although it is recognised that there are relevant policies in the emerging DM Policies DPD).

  The appraisal highlights a number of instances where policy wording in the plan could be reworded or elaborated on in order to strengthen the positive effects of the plan (e.g. crime, housing, accessibility, biodiversity, open space, townscape/heritage, water resources, air quality, energy and carbon, sustainable transport)."

WHAT ARE THE NEXT STEPS?

For each of the four plans:

- Subsequent to the current consultation it is the Council's intention to prepare the final draft ('proposed submission') version for publication. The proposed submission version will be that which the Council believes to be 'sound' and intends to submit for Examination.
  - The SA Report (as opposed to an *Interim* SA Report) will be published alongside the proposed submission version. The SA Report will present certain, legally required information.
- Subsequent to Publication of the Proposed Submission Plan / SA Report, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed to be 'sound'. Assuming that this is the case, the plan (and the summary of representations received) will be submitted for Examination.
- 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'*.