Integrated Impact Assessment (IIA): Draft Scoping Report

New Haringey Local Plan | November 2020

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1. Purpose of this Report

1.1 Background

Haringey Council is preparing a new Local Plan to take into account the adoption of a new Borough Plan (2019-2023), the declaration of a Climate Emergency, the emerging new London Plan and new National Planning Policy Framework (2019), support recovery and renewal from Covid-19, and respond to housing delivery challenges. To support the preparation of the Local Plan the Council is carrying out an Integrated Impact Assessment (IIA).

The IIA is designed to ensure that through the development of the Local Plan the effects of its policies, need for any mitigation, and reasonable alternatives, are adequately considered so that the decision-making process is an informed one. It is comprised of three different assessments:

- A Sustainability Appraisal – A systemic process required under the Planning and Compulsory Purchase Act 2004 and by EU Directive that is carried out during the preparation of the Local Plan. Its purpose it is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives when judged against reasonable alternatives.

- An Equalities Impact Assessment – This aims to ensure that through preparation of the Local Plan the Council is complying with its duty in relation to the Equality Act 2010 to eliminate unlawful discrimination in carrying out its functions, promote equality of opportunity between different genders, racial groups and other equality groups and foster good relations between people who share a protected characteristic and those who do not share it. Although low income groups are not identified as having 'Protected Characteristics', they will be considered as part of this assessment as low income and deprivation typically overlap with many protected characteristics.

- A Health Impact Assessment – This helps ensure the plan promotes health gains for the local population, reduces inequality and avoids activity damaging health. This is not a statutory requirement but is good practice to support plan-making.

The assessment also takes into account the responsibility placed on local authorities by Section 17 of the Crime and Disorder Act 1998 to do all that they reasonably can to prevent crime and disorder.

In addition to the IIA assessment, under Article 6(3) and (4) of the Direction 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans are subject to Habitats

Regulations Assessment (HRA). The HRA assesses the impacts of a land-use plan on the conservation objectives of a European Site to identify whether it would adversely affect the integrity of the site. The HRA will be undertaken as part of the production of the Local Plan and its findings will be taken into account in the IIA where relevant.

1.2 Purpose of the Scoping Report

This Scoping Report is the first stage in developing the IIA. It sets out a proposed framework of objectives and indicators against which the environmental, economic, social sustainability impacts, and equalities, health, crime and disorder effects of the policies in the emerging Local Plan can be appraised, including against reasonable alternatives.

In order to identify this framework of objectives and indicators the report first undertakes the following steps:

A. Context Review – a review of relevant policies, plans, programmes, sustainability objectives and strategies produced by the Government, Council and other key organisations such as the Greater London Authority (GLA).

B. Baseline Review – a review of the current characteristics and conditions in the borough and future trends in the absence of a new plan.

C. Key Issues and Opportunities Summary – a summary of the key issues and opportunities identified in A and B. This is focused on areas that the plan can influence.

D. IIA Framework Development – a refinement of the key issues.

Context Review

Baseline Review

Key issues and opportunities

IIA Framework

The Council is inviting views on the appropriateness of the proposed IIA framework, its objectives and indicators.

1.3 Structure of the Scoping Report

The document is structured under topic-based headings, categorised within the four priorities of the Haringey Borough Plan 2019-2023.

People (Priority 2)

- Demographics
- Social Integration and Inclusion
- Health
- Education

Place (Priority 3)

- Air Quality
- Climate Change Mitigation
- Climate Change Adaptation
- Water Resources and Water Quality
- Noise
- Waste Management
- Biodiversity and Open Spaces
- Land and Soils
- Landscape
- Design
- Heritage and Culture
- Transport
- Social Infrastructure: Play and Recreation

Housing (Priority 1)

- Housing

Economy (Priority 4)

- Economy and Employment
- Town Centres

Each topic chapter sets out:

1. the policy **Context**

2. the current **Baseline** and projections for the future

3. **Health and Equalities Impacts**

4. key **Issues, Opportunities** before coming up with suggested **Objectives** for the IIA Framework

1.4 United Nations Sustainable Development Goals

The United Nations Sustainable Development Goals (SDGs)[1] are a framework for the key global challenges of economic, environmental and social sustainability, which every country within the UN General Assembly has agreed to deliver by 2030.

There are 12 goals which the Council has taken account of in producing this document. Of particular note is Sustainable Development Goal 11: Sustainable Cities and Communities. The targets of this goal are covered in the various sections of this document as set out below:

- Target 11.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums – **see chapter 5, Housing**
- Target 11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons - **see section 4.9, Transport**
- Target 11.3 By 2030, enhance inclusive and sustainable urbanisation and capacity for participatory, integrated and sustainable human settlement planning and management in all countries – **see Engagement and Communications Plan for the New Local Plan.**
- Target 11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage – **see chapters 4.8, 4.7, 4.5 and 4.6, Biodiversity and Open Spaces, Land and Soils, Landscape, and Heritage and Culture.**
- Target 11.5 By 2030, significantly reduce the number of deaths and the number of people affected and substantially decrease the direct economic losses relative to global gross domestic product caused by disasters, including water-related disasters, with a focus on protecting the poor and people in vulnerable situations **see section 4.3, Climate Change Adaptation**
- Target 11.6 By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management **see sections 4.2 and 4.12, Air Quality, Waste Management**

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[1] United Nations, 'Sustainable Development Goals', viewed on 30 October 2020, https://www.un.org/sustainabledevelopment/

- Target 11.7 By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities etc. **see section 4.5, Biodiversity and Open Spaces**
- Target 11.A Support positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning - **This is covered by the London Plan and the Duty to Co-operate[2]**
- Target 11.B By 2020, substantially increase the number of cities and human settlements adopting and implementing integrated policies and plans towards inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters, and develop and implement, in line with the Sendai Framework for Disaster Risk Reduction 2015-2030, holistic disaster risk management at all levels – **see sections 4.3 and 4.2, Climate Change Adaptation and Mitigation**
- Target 11.C Support least developed countries, including through financial and technical assistance, in developing sustainable and resilient buildings utilising local materials. **This is considered to be a national matter, beyond the scope of the New Local Plan**

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[2] Planning and Compulsory Purchase Act 2004, Section 33A, Viewed on 30 October 2020, https://www.legislation.gov.uk/ukpga/2004/5/section/33A

1.5 Spatial Context

Haringey is situated in north London within the Outer London group of boroughs, although it has good links to Central London and shares similar characteristics to Inner London boroughs. It covers an area of more than 11 square miles and is estimated to have a total resident population of over 271,000.

The borough lies in a strategic location with strong links to the City, West End and Stansted Airport. It falls within the London-Stansted-Cambridge Consortium area, referred to as the UK's Innovation Corridor.
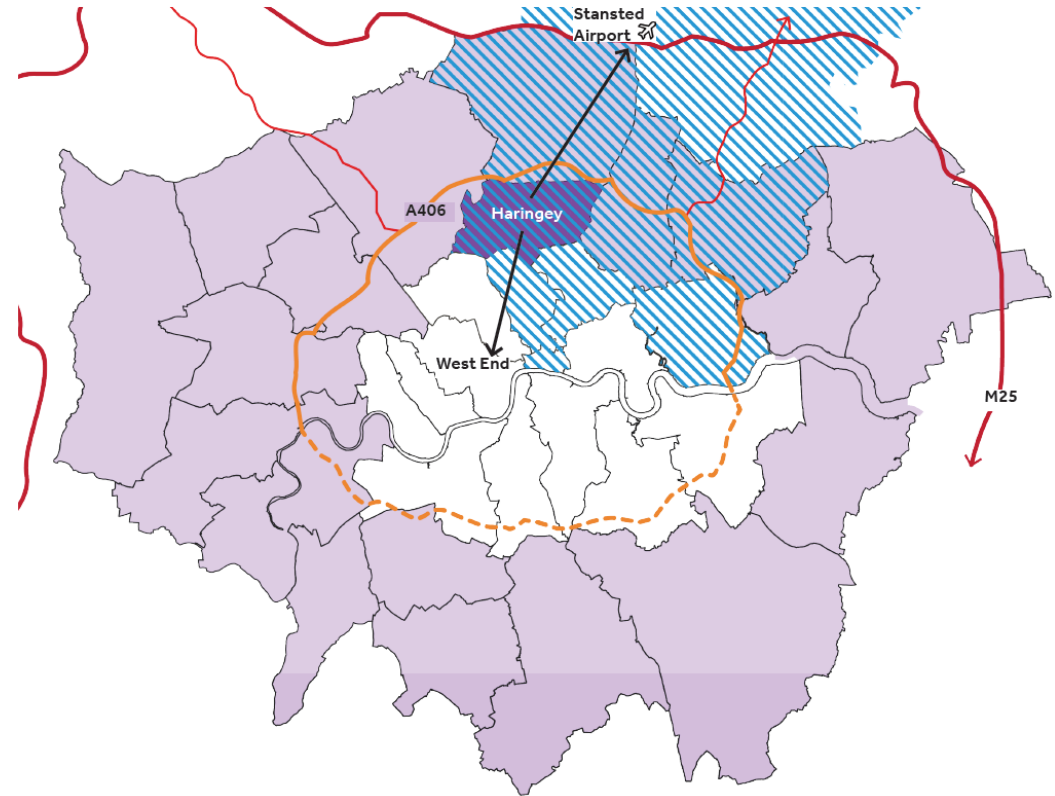
KEY

Outer London

London-Standsted-Cambridge Consortium Area

1.6 Policy Context

Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) requires each local planning authority to identify their strategic priorities and have policies to address them in their development plan documents. Under regulation 10A of The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), local planning authorities are required to review their local plans at least once every 5 years from their adoption date. The Local Plan must be positively prepared, justified, effective and consistent with national policy and guidance in accordance with section 20 of the Planning and Compulsory Purchase Act 2004 (as amended) and the National Planning Policy Framework in order to be found legally sound.

Figure 2: New Local Plan structure
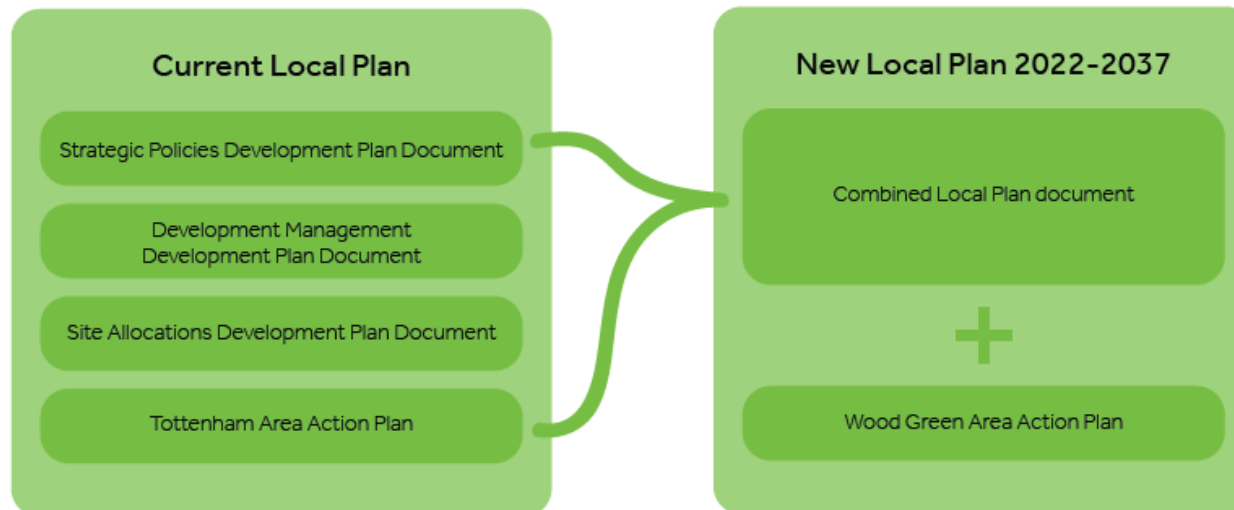
Haringey's Development Plan includes:

- The London Plan
- The Local Plan which at present is comprised of the Strategic Policies Development Plan Document, Development Management Development Plan Document, Tottenham Area Action Plan and the Site Allocations Development Plan Document.
- The Highgate Neighbourhood Plan

The Council is looking to combine all the existing Local Plan documents into one New Local Plan document. It is also in the process of preparing a Wood Green Area Action Plan which is proposed to be a separate Development Plan document. In addition, a North London Waste Plan is being produced and will form part of the wider Development Plan.

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2. People

2.1 Demographics

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- an overall stated purpose to contribute to the achievement of sustainable development – meeting the needs of the present without compromising the ability of future generations to meet their own needs;

- an economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

- a social objective to support strong, vibrant communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being; and

- an environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Regional

The London Plan 2019 (London Plan)[3] seeks to deliver 'Good Growth' – growth that is socially and economically inclusive and environmentally sustainable. This underpins the whole of the Haringey's Local Plan and each policy.

The plan is informed by six Good Growth objectives:
- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

The London Plan identifies Opportunities Areas – significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all

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3 Greater London Authority, (2019). Intent to Publish London Plan 2019, London, viewed on 30 October 2020, https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/intend-publish-london-plan-2019.

types), linked to existing or potential improvements in public transport connectivity and capacity. Two Opportunity Areas are identified in Haringey:

- Lee Valley; and
- Wood Green/Haringey Heartlands.

The plan states that boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment.

Local

Policy SP1 of the Local Plan Strategic Policies (adopted 2017) looks to focus growth in suitable locations and managing it to make sure it delivers opportunities and benefits to achieve strong, healthy and sustainable communities for the whole of the borough. The identified Growth Areas are:

- Wood Green;
- Tottenham Hale; and
- North Tottenham

There is support for the protection of and provision of new social and community infrastructure (Policy DM49), and losses are resisted unless a replacement facility that meets the same needs is provided. Major developments can be required to provide new facilities where deficiencies exist. Both the London Plan and Local Plan policy require new facilities to be accessible by public transport.

Baseline

- The GLA's housing-led population projections estimate Haringey's 2020 population to be approximately 271,223, up from 255,438 in 2011.[4]

- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. 51% of residents are under the age of 35 and 10% are aged 65 or over.

- 4% of Haringey residents are gay or lesbian. This is above the London average of 3.1%. Haringey has the 9th largest gay and lesbian population of all local authorities in the country.[5]

- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 49th most deprived local authority in England. 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.[6]

- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and over 180 languages are spoken. Our population is

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[4] Greater London Authority 'Housing-led population projections – London Datastore', viewed 30 August 2020, https://data.london.gov.uk/dataset/housing-led-population-projections
5 ONS Annual Population Survey, 2013-15

6 Ministry of Housing, Communities & Local Government, 'English indices of deprivation 2019, viewed 30 August 2020, https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

the fifth most ethnically diverse in the country[7]. In 2018 Black and Ethnic Minority groups comprised 38% of the population with 26% identifying as Other White groups.

- Tottenham is one of the most ethnically diverse areas in the country and has a relatively transient population. Over three quarters (78.9%) of the population are from a non-White British ethnic group, compared to 55.1% for London.[8]
- 4,500 people in Haringey have a serious physical disability. Almost 5,000 people have sight loss which impacts on daily living and around 15,700 adults have a moderate or severe hearing impairment.[9]
- There are nine libraries in Haringey, giving good access across the Borough.
- There are 168 community buildings in the borough, falling within the public, private and voluntary sectors. The council owns 43 buildings that are leased for community use.

Projections

Haringey's population is expected to increase by close to 9% by 2037, to 295,162.

The ethnic groups with the highest expected growth to 2028 are 'Other ethnic group' and 'Other White', growing by 10% each, while Black Caribbean and Bangladeshi groups are expected to decrease by 12% and 8% respectively[10]. The White British group will remain the largest population overall, followed by Other White and Black African.

The highest expected growth in the 2018-based population projections (to 2030) is in the 65+ groups, with the 65-84 year old population growing from 25,348 to 33,076 (+30%), and 85+ growing from 3,285 to 3,897 (+18.5%)[11].

Despite the large percent increase, the population over 65 is projected to account for only 13% of Haringey's population in 2030, a total of 36,973 residents.

The percentage of the population that is under 18 is not expected to change significantly. It will remain most concentrated in the East of the Borough.

Our social and community sector is facing some difficult challenges. The past decade has seen a London-wide trend of cultural venues and spaces closing down. This trend is likely to have been further accelerated by the economic consequences of the COVID-19 pandemic. This includes a

7 Office for National Statistics, 2011 Census: Digitised Boundary Data (England and Wales) [computer file]. UK Data Service Census Support. Downloaded from: https://borders.ukdataservice.ac.uk/
8 Ibid.
9 Haringey Council, 'State of the Borough – July 2020', https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

10 Greater London Authority, '2018-based population projections – London Datastore' https://data.london.gov.uk/dataset/trend-based-population-projections
11 Ibid.

25% reduction in the number of pubs, which are often used as community hubs and have rooms to rent for social functions or meetings[12]. Rising rents may also put pressure on existing venues. The need for community facilities to accommodate a rising population and to help address deprivation and inequalities is likely to continue to increase.

Town centres are accessible places for most people and may play a key role in providing community hubs and facilities. New development provides the opportunity to deliver new community spaces and services.

Health and Equalities Impacts

Haringey is home to a diverse and young population when compared to the rest of the country. Almost half of the population and three-quarters of our young people are from ethnic minority backgrounds, with over 180 languages spoken, meaning a range of services and facilities are needed.

The New Local Plan will need to consider the extent to which its policies and strategies:

- Address the diverse needs of Haringey's current and future population
- Ensure equal access to environmental, social and physical infrastructure

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- A need to plan for new housing, employment, infrastructure and services to meet the needs of a growing and diverse population, particularly taking into account the borough's comparatively young population and also a growing older population.

Key issues discussed above are covered by the IIA objectives listed in subsequent sections and chapters.

2.2 Social Integration and Inclusion

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- Planning policies should aim to achieve healthy, inclusive and safe places which:
  - promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other

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12 Greater London Authority, 19 April 2017 'Shocking data reveals number of pubs in London fell by 25% since 2001' accessed 30 August 2020,

https://www.london.gov.uk/press-releases/mayoral/number-of-pubs-in-london-fell-by-25-since-2001

- o are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion
- Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees and be accessible through the use of digital tools to assist public involvement and policy presentation

Regional

The main messages from the London Plan include:

- a Good Growth objective of building strong and inclusive communities, building on the city's tradition of openness, diversity and equality;
- aupporting the creating of inclusive neighbourhoods by embedding inclusive design into planning policies;
- contributing to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration;
- ensuring that the social infrastructure needs of London's diverse communities are met, informed by a needs assessment;
- supporting comprehensive regeneration of areas based on a thorough understanding of the demographics of communities and their needs; and

- working with local Metropolitan Police Service 'Design Out Crime' officers to maintain a safe and secure environment and reduce the fear of crime.

Local

Two of the four top priorities in the Borough Plan 2019-2023 are 'Tackling serious violent crime' and 'Reducing inequality and making Haringey a fairer place'.

The Fairness Commission Report 2020 – 'Progress with Humanity: A Fairer Way Forward' outlines 32 recommendations for how the council, working with others, can tackle inequality and promote fairness and the borough.

Policy SP9 of the Local Plan looks to improve skills and training to support access to jobs and community cohesion and inclusion. There is support for the protection of and provision of new social and community infrastructure (Policy DM49), and losses are resisted unless a replacement facility that meets the same needs is provided. Policy DM2 also requires new development to be safe and accessible and supports the principles in Secured by Design guidance.

Baseline

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime

- 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

- Haringey is a relatively deprived borough. It is ranked 49 out of the 317 local authorities in England with respect to deprivation and is the 4th most deprived in London as measured by the Indices of Multiple Deprivation (IMD) score 2019[13]

- There is a marked divide between the east and west of the borough in terms of deprivation. The most deprived areas are heavily concentrated in the east, where more than 20% of the LSOAs (Lower Super Output Areas or small neighbourhood areas) fall into the 20% most deprived in the country[14]. By comparison, in the west a very small proportion of LSOAs fall into that category, and in the westernmost wards there are none

- There is a marked disparity in employment and skills across the borough, following a similar pattern to overall levels of deprivation

- There is a concentration of employment deprived areas to the east of the borough, whereas areas to the south west of the borough are amongst the least employment deprived in England

- The Haringey Association of Voluntary and Community Organisations (HAVCO), provides support and promotes and develops Haringey's diverse voluntary and community sector organisations

Projections

Emerging evidence indicates that COVID-19, social distancing, and associated policy measures have had disproportionate impacts upon already vulnerable and disadvantaged groups.

Older people, BAME communities, people with disabilities, and people from disadvantaged socio-economic backgrounds have been more affected by the Covid-19 virus in terms of illness and deaths.

The local economy will be severely impacted in terms of loss of employment, business viability and rising poverty, although the full extent of the impact is not yet known.

The latest DWP local data (July 2020)[15] shows a huge increase in the number of Universal Credit declarations (claims) being made and the number of individual claimants has grown significantly.

[13] Ministry of Housing, Communities & Local Government, 'English indices of deprivation 2019' https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019
[14] Ibid.

[15] Department for Work & Pensions, 'Statistics at DWP' https://www.gov.uk/government/organisations/department-for-work-pensions/about/statistics

Town centres will likely continue to serve as key hubs for services and facilities for both the Borough and the wider sub-region. As the population grows, services - and means of access to them - could come under increased pressure.

However, there are likely to be more development opportunities in the east of the borough and so capturing opportunities through new development to address the deprivation issues in this area is important.

Health and Equalities Impacts

Crime and deprivation are important issues that have significant impacts on physical and mental health and wellbeing. There is a spatial dimension to crime and deprivation 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.

The rate of youth violence has gone up in recent years and remains an urgent issue for the borough, that disproportionately affects African and Black-Caribbean communities, and boys in particular.[16]

Police data shows that while overall race and religious hate crime slightly decreased, incidences of anti-Semitic, Islamophobic, homophobic and transgender hate crime all increased in Q1-Q3 2019 compared with the nine months prior[17].

The New Local Plan will need to consider the extent to which its policies and strategies:

- promote social interaction in a way that fosters a culture of equality, fairness and respect; and
- improve safety and address fear of crime to help remove barriers to activities leading to reduced social isolation, particularly in areas of higher deprivation.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- There is a need to address unemployment in order to tackle rates of crime, and given the spatial patterns of deprivation, there will be different actions needed to help tackle these issues including improving access not

[16] Haringey Council 2019 'Young People at Risk Strategy': https://www.haringey.gov.uk/local-democracy/policies-and-strategies/young-people-risk-strategy

[17] Metropolitan Police 2019 'Hate crime dashboard': https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/ - It should be noted that this decrease represents a

decrease in reported incidents of hate crime, and not necessarily a decrease in hate crime itself. One implication of this is that people may, in fact, be less confident in how to report this type of crime to the police.

only to jobs but also community services within these areas.

- Haringey has a wealth of voluntary organisations and community services that contribute to positive change in the community. This contribution should be valued and utilised wherever possible throughout the planning process.
- There is an opportunity to use regeneration and investment in key areas such as Wood Green and Tottenham to address issues of crime and deprivation.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to support strategic improvements to areas with highest deprivation which could lead to benefits in more disadvantaged parts of the borough;
- to support the provision of social infrastructure to help address low levels of educational attainment and high levels of deprivation; and
- to reduce crime, protect residents, and improve perceptions of safety in Haringey's public realm, thereby enabling our diverse population to fully participate in their local community.

2.3 Health

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- enabling and supporting healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling;
- supporting the implementation of local strategies to improve health, social and cultural well-being for all sections of the community; and
- providing access to high-quality open spaces and opportunities for sport and physical activities that contribute to the health and well-being of communities.

Regional

The main messages from the London Plan include Policy GG3 (Creating a healthy city) which recognises the cross-cutting and multilateral nature both of healthcare provision and of enabling healthy lifestyles, noting the significance at a London-wide scale of ensuring that "wider determinants of health are addressed in an integrated and coordinated way, taking a systematic approach to improving the mental and physical health of all Londoners and reducing health inequalities."

The Health Inequalities Strategy (2018) presents a London-wide strategy for tackling identified 'unfair differences' in

health outcomes across the city, focussing on the five core themes of healthy children, healthy minds, healthy places, healthy communities and healthy living.

Local

Policy SP14 of the Local Plan seeks to improve health and wellbeing in Haringey through working with the NHS, planning for new health infrastructure and protecting existing facilities. It also looks to focus investment in those areas where health inequalities are the greatest. Policy DM46 and DM47 seek to prevent unhealthy concentrations of betting shops and hot food takeaway uses that are known to contribute to poor health outcomes, and more generally the promotion of better health is incorporated into many other policies such as improving access to open space, design and living standards, and support for community and recreational facilities.

Baseline

Health and well-being in Haringey is similar to the London average. Life expectancy rates in Haringey are increasing and are expected to improve further.

However, health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. A child born in Highgate can expect to live

6 years longer than one born in Tottenham. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.

Other key indicators find that:

- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese[18]
- Health inequalities are more likely amongst certain groups of residents, including those with protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 45% of BME Year 6 children overweight or obese compared to 33% of White British year 6 children[19]
- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years)[20]
- 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

[18] Haringey Council. 'Haringey's Health and Wellbeing Strategy 2012-2015' https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_health_and_wellbeing_strategy_2012-2015.pdf

[19] Haringey Council, 'State of the Borough – July 2020', https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

[20] Haringey Council. 'Haringey's Health and Wellbeing Strategy 2012-2015' https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_health_and_wellbeing_strategy_2012-2015.pdf

borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas[21]

In terms of services, there are 36 general practices in Haringey which currently deliver primary healthcare across the borough[22]. A recent Capacity Review of key wards within the borough has identified existing capacity pressures. The study shows that Haringey's primary care estate has relatively high rates of patients per room.[23] However, this is not necessarily an indicator of the quality of patient care.

The practice with the highest ratio of patients to clinical rooms, West Green, is the only practice in North Central London (NCL) to have an overall Care Quality Commission Outstanding rating. London has fourteen practices that have been rated by the Care Quality Commission as outstanding for their leadership and Haringey has three of them. However, many of the existing facilities are smaller, and run from accommodation that is not fit for purpose, including terraced houses, converted shop fronts and temporary portable buildings.

Projections
An estimated 7,842m² of space is required across the borough by 2026 to meet need[24]. Based on 1,800 people per GP, there

are identified future shortfalls in Wood Green and large parts of the east of the borough including Northumberland Park, Harringay, St. Ann's, Seven Sisters, West Green and Tottenham Hale[25].

New health provision is currently being delivered on Green Lanes and within Muswell Hill and outline permission has been granted for a health use on the Tottenham Hotspur Stadium site.

Health and Equalities Impacts
The health of the population is not just a matter of how well the health service is funded and functions, important as that is. Health is closely linked to the conditions in which people are born, grow, live, work and age. Inequalities in power, money and resources are the social determinants of health.

Health inequalities are more likely amongst certain groups of residents, including those with protected characteristics, for example obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).

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[21] London Health Programmes Needs Assessment Toolkit 'Male Life Expectancy in Haringey 2005-2009'
[22] Haringey Council, 'Haringey Infrastructure Delivery Strategy Update 2016' https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_idp_update_april _2016.pdf
[23] NHS Haringey Clinical Commissioning Group, 2019, 'Improving primary care in Haringey'

https://www.minutes.haringey.gov.uk/documents/s107361/Primary%20care%20OSC%20slides_220219.pdf
[24] Haringey Council, 'Haringey Infrastructure Delivery Strategy Update 2016' https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_idp_update_april _2016.pdf
[25] London Health Programmes Needs Assessment Toolkit 'Male Life Expectancy in Haringey 2005-2009'

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 in the centre and east.

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 to enable older people to live healthier and independent lives. It is important to promote an increased uptake in active travel (walking and cycling) and enable investment in leisure and community facilities. This will benefit all groups.

The New Local Plan will need to consider the extent to which its policies and strategies:

- promote improvements in physical and mental health, particularly in areas of health and social deprivation;
- reduce differentials in life expectancy and healthy life expectancy across the borough;
- address the social determinants of health; and
- improve access to health and social care services and facilities, particularly in areas of deficiency such as the centre and east of the borough.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- The need to address the social determinants of health by ensuring homes and buildings are healthy, the outdoor environment enables active and healthy lifestyles and is accessible and inclusive, people have access to open spaces, nature and sports facilities, and there is a need to address deprivation and improve the socio-economic circumstances of residents.
- The need to secure high-quality new health facilities for general practices that are currently operating in poor quality accommodation.
- The needs of Haringey's ageing population will be a major consideration for planning in the borough for the next 15 years. The Council must ensure that essential services are within easy access for all. Future-proof and well-designed housing, accessible community facilities and high-quality public realm will be required in enabling older people to live healthier and independent lives for longer.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to contribute to the physical and mental health and wellbeing of residents;
- to address the social determinants of health including housing, environment, and economic and social conditions of residents;
- to improve the quality of, and access to, health facilities; and

- to support the provision of quality, affordable and healthy food.

2.4 Education

Context

National

The main message from the National Planning Policy Framework (NPPF) is 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.

Regional

The main message from the London Plan is that the Mayor will support the provision of education facilities to meet the demand generated by London's growth.

Local

Similarly, Haringey's Local Plan supports new educational facilities, and also has an emphasis on improving training and skills. Policy SP9 seeks to address unemployment by facilitating training opportunities for the local population, which is supported by Policy DM48 which identifies training and skills development as a type of Planning Obligation the Council may seek from new development.

Baseline

Educational attainment in Haringey is improving, but it remains below London levels. Of note:

- The percentage of Haringey residents with no qualifications (8.6%) is not particularly high, but there are localised issues[26]. In Tottenham Hale 22.45% of residents aged 16 and over have no qualifications.
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters.
- Post-16 attainment in Haringey is improving but high-quality academic opportunities are limited in the east of the borough and in the sub-region. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education. The 2020 School Place Planning Report identified that 282 students from Haringey studied a vocational course in borough. This compares with 844 students from Haringey studying a vocational course out of borough.[27]
- Although levels of education are improving in the

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[26] Haringey Council, 'State of the Borough – July 2020', https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

[27] Haringey Council 'School Place Planning Report 2020' https://www.haringey.gov.uk/children-and-families/schools-and-education/projects-consultations-and-inspections/consultations/school-place-planning-report

borough, certain groups, including those with protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment.

- The Adult Participation in Learning Survey 2019[28] notes a decade long decline in the number of adults participating in learning. There are persistent inequalities in learning, with the adults who could most benefit from participating in learning being the least likely to do so. Those in lower social grades, those with fewer years of initial education, and those furthest from the labour market remain under-represented in learning. Participation declines with age, with older adults being significantly less likely to participate in learning.

There is now sufficient capacity in Primary Schools within the Borough due to recent school place expansions, however this is now starting to feed into the Secondary School system, where capacity is limited.

Projections

It is now clear that we have moved beyond a recent rise in demand for primary school places and key future challenges will include managing surpluses of places in primary schools, whilst safeguarding future provision and diversity in provision,

alongside building additional capacity for Haringey secondary schools.

There is a clear upward trend in the demand for secondary school places in the borough. Despite rises in planned admission numbers across secondary schools in the borough in recent years, in some circumstances, this is still resulting in a shortfall of capacity. Rises in planned admission numbers across secondary schools in the borough have taken place in recent years. Shortfalls of capacity are still projected until 2023/24 so additional capacity will need to be added[29].

There are 10 establishments in Haringey which offer post-16 (Years 12 and 13) capacity including 7 schools. Generally, schools in our borough with sixth forms are either full or near to capacity.

It is likely to be increasingly important to improve access to adult education because of the effects of COVID-19 on the economy and accelerated structural changes happening within the labour market.

Health and Equalities Impacts

Education is an important issue, recognising that although levels of education are improving in the borough, certain groups, including those with protected characteristics, can face greater barriers to educational achievement than others,

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[28] https://learningandwork.org.uk/wp-content/uploads/2020/04/Adult-Participation-in-Learning-Survey-2019.pdf

[29] Haringey Council 'School Place Planning Report 2020'
https://www.haringey.gov.uk/children-and-families/schools-and-education/projects-consultations-and-inspections/consultations/school-place-planning-report

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 (this is particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals[30].

Similar patterns of inequality also apply to adults where the lower the social grade, the older the person and the less education someone has, the less likely they will access adult learning[31].

The New Local Plan will need to consider the extent to which its policies and strategies:

- improve inclusivity and accessibility of education and training facilities, particularly in areas where the need is greatest.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- The need to improve the provision of, and access to, education and training facilities, particularly in the east of the Borough, and to ensure that sufficient secondary school places are delivered to meet expected demand, whilst protecting existing primary provision.

- Additionally, the need to increase educational attainment across the Borough, but particularly in areas of deprivation is crucial, and continued support for post education skills and training development will be vital.

In light of the key issues discussed above it is proposed that the IIA should include the following objective:

- to improve quality of, and access to, education and training facilities.

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[30] Children Eligible for and Claiming Free School Meals, Schools, Pupils and their Characteristics January 2019

[31] INSERT REFERENCE

3. Place

3.1 Air Quality

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- Planning policies should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

- Opportunities to improve air quality or mitigate such impacts should be identified, such as through traffic management, and green infrastructure provision and enhancement. As far as possible opportunities should be considered at the plan-making stage to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.

- Significant development should be focused on locations which are or can be made sustainable, through limiting the need for travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

- New and existing developments should be prevented from contributing to, being at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.

- Development should, wherever possible, help to improve local environmental conditions such as air quality, taking into account relevant information.

The Air Quality Standards Regulations 2010 transpose into UK law the Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health such. The UK also has national emissions reduction commitments for overall UK emissions of five main pollutants to be reduced by 2020 and 2030. These include: fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide and non-methane volatile organic compounds (VOCs).

The Air Quality (England) Regulations 2010 require local authorities to have registers of air quality information and data which is easily accessible to the public. It also gives the Secretary of State powers to require local authorities to carry out reviews of air quality and declare specific locations as Air Quality Management Areas (AQMAs).

The Clean Air Strategy 2019[32] sets out the comprehensive actions required by all parts of government that is required to meet the UK's emission reductions commitments. As part of this strategy, the Government has put forward an Environment Bill which would, among other things, amend the Environment Act 1995 to give local authorities powers to enforce air quality targets.

Regional

The main messages from the New London Plan include:

- Policy SI1 (Improving air quality) which states that development plans should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor or boroughs' activities to improve air quality. Development proposals should not lead to further deterioration of existing air quality or create unacceptable risk of exposure to high levels of air pollution, or create new areas that exceed air quality limits. Proposals must not delay the date by which they comply with this policy
- Policy SI2 (Minimising greenhouse gas emissions) which states that major development should be net zero-carbon.
- Policy GG3 (Creating a healthy city) which seeks to improve Londoners' health and reduce health

inequalities by improving London's air quality, reducing public exposure to poor air quality and minimising inequalities in levels of exposure to air pollution.

The London Environment Strategy 2018 [33] aims include having the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities. There are a number of things the Strategy says that London boroughs can do to help achieve its aim. These include:

- reducing pollution from new developments through planning (especially those not referred to the Mayor), as well as from existing buildings;
- improving the public realm for walking and cycling;
- targeted measures at pollution hotspots, such as vehicle restrictions and green infrastructure; and
- supporting installation of infrastructure to fuel zero emission vehicles.

Local

Outcome 9 of the Borough Plan (2019-2023) is 'A healthier, active and greener place'. Objective c) of that outcome is to improve air quality, especially around schools. Measures that the Council will take to achieve this include:

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[32] DEFRA (2019) Clean Air Strategy 2019 [Online] available at
https://www.gov.uk/government/publications/clean-air-strategy-2019

[33] GLA (2018) London Environment Strategy 2018 [Online] available at
https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

- reducing the impact of road vehicles on air pollution including through parking controls, parking charges and improving the environmental emissions of the Council and partners' vehicle fleets;
- reducing the impacts of emissions from developments and buildings on the local community through planning controls and sustainable design;
- encouraging residents to make choices that minimise air pollution such as such as travelling by walking, cycling and using public transport; and
- supporting all schools to reduce the impact of air pollution on pupils.

Local Plan Policy DM23A-C Environmental Protection: Air Quality requires all development proposals to improve or mitigate the impact on air quality and to improve air quality for building occupants and all stakeholders who use the development. Air quality assessments are required for all major development and other development proposals where appropriate.

The Air Quality Action Plan (2019-2024)[34] sets out a detailed set of actions, outputs and targets.

Baseline

Regional

Two of the key monitoring sources used to inform London's Environment Strategy 2018[35] are the London Atmospheric Emissions Inventory (GLA) and the London Air Quality Network (Kings College).

London meets legal limits set by the national Air Quality Regulations for most pollutants. However, two pollutants remain a specific concern. These are particulate matter (PM_{10}, $PM_{2.5}$ and black carbon) and nitrogen dioxide (NO_2).

The majority of these emissions in London are caused by road traffic (around 50%), with other key sources being; non-road mobile machinery (like those used in construction); emissions from homes, workplaces, large scale generators, wood burning and biomass; and resuspension (when settled particulate matter is disturbed i.e. by vehicles driving over it, and is returned into the atmosphere).

Air quality is measured in concentrations (specific levels of a pollutants in a given area). London's pollution concentrations have been gradually decreasing, however the NO_2 mean limits are being exceeded in many places and the PM guidelines are a long way from being met.

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[34] Haringey Council (2019) Air Quality Action Plan (2019-2024) [Online] available at https://www.haringey.gov.uk/local-democracy/policies-and-strategies/building-stronger-haringey-together/priority-3-clean-and-safe/place-strategies-and-policies.

[35] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

Emissions refer to the release of pollutants. Total NO_x emissions in London fell 25 percent between 2008 and 2013 (compared with a target of 35 percent in the previous London Air Quality Strategy). Total PM10 emissions fell by 20 per cent (compared with a 31 per cent target), and total PM2.5 emissions fell by 27 per cent (there was no previous reduction target)[36].

Local

Haringey was declared an Air Quality Management Area in 2001 as it failed to meet the relevant air quality objectives for nitrogen dioxide (NO_2; annual mean objective) and Particulate Matter (PM_{10}; 24-Hour mean objective). For PM_{10}, air quality objectives are now largely being achieved, but there are still widespread exceedances of NO_2, particularly along busy and congested roads. Haringey also has a formal responsibility to work towards the national requirement for reductions of $PM_{2.5}$.

An air quality 'Focus Area' is a location that has been identified by the GLA as having high levels of pollution and human exposure. There are eight focus areas in the borough (Figure 3). In addition, through air quality modelling work commissioned by the Council, a further seven hotspot areas at these locations have been identified (Figure 3).

Haringey operates two automatic monitoring stations, one Roadside site on High Road, Tottenham and another in a south borough local park, classified as a background site. Annual mean NO_2 concentrations at the Roadside site have been trending downwards since 2014, with the 2018 results of 39µg/m^3 just below the annual objective of less than 40µg/m^3. Levels at the background site, meanwhile have been well below the annual objective, hovering at around 25µg/m^3 since 2013[37].

Haringey also operates 15 non-automatic monitoring sites for Annual Mean NO_2 concentrations, including at vulnerable locations such as schools and GP surgeries. These have largely remained at steady levels or slightly decreasing since 2014. In 2018, three of roadside sites had annual concentrations in excess of the objective[38].

Projections

Future growth in housing and employment has the potential to negatively impact air quality as a result of pollutants from increased traffic flows. New development in sustainable locations and planned investment in sustainable transport infrastructure could help support the take up of sustainable transport and a reduction in pollution levels. The long-term impact of Covid-19 is unclear. Traffic flows and associated

[36] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy, pg 47.
[37] Haringey Council (2019) Air Quality Report 2018 [Online] available at https://www.haringey.gov.uk/business/licensing-and-

regulations/environment-and-waste/pollution-control/pollution-control-local-air-quality
[38] As above.

pollutants may reduce as more people work from home, however, more people may also return to car use to avoid public transport and the transmission risks associated with it.

Figure 3 Modelled map of annual mean NO2 concentrations including monitoring locations and Air Quality Focus Areas (from the LAEI 2013)
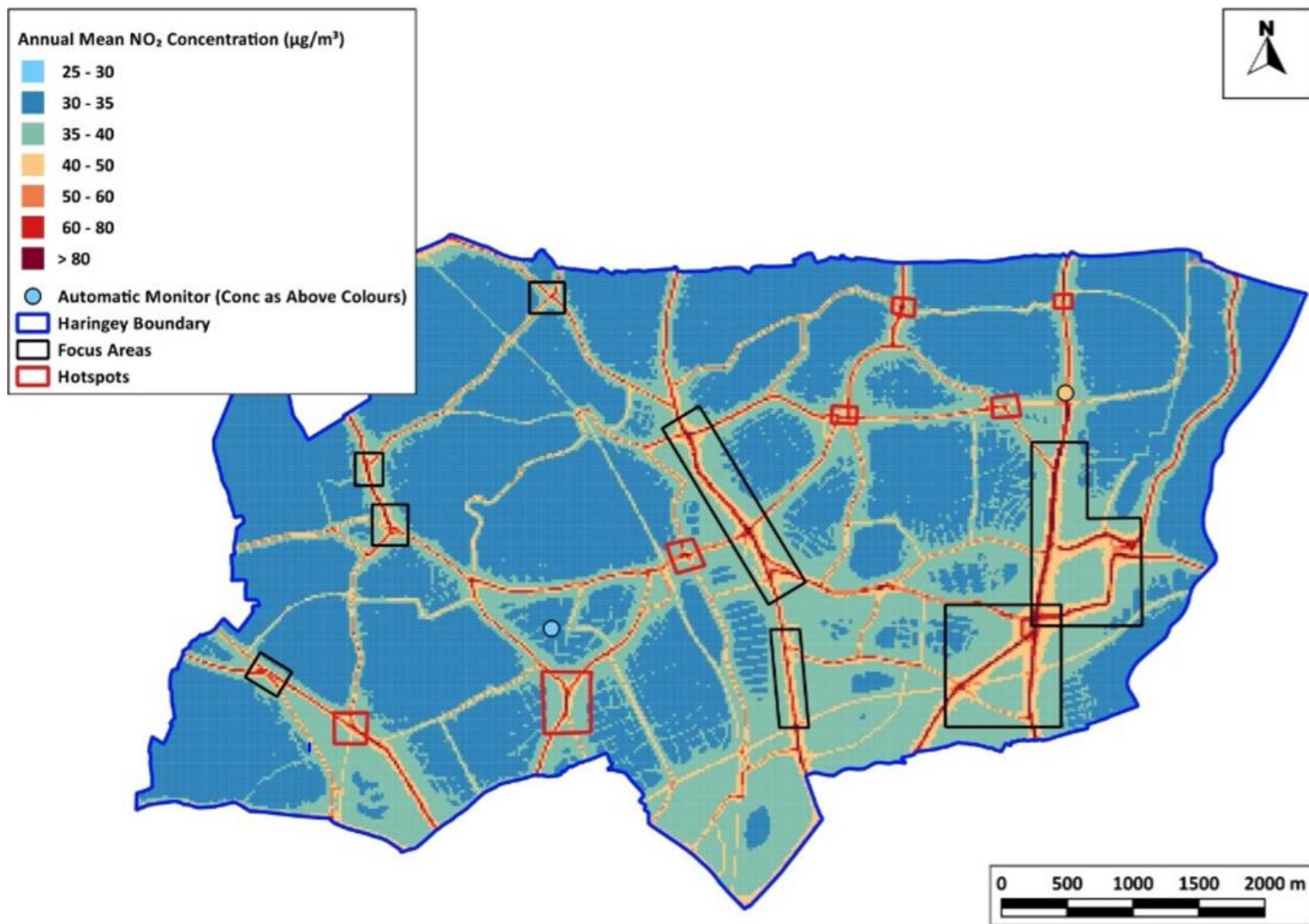
Health and Equalities Impacts

Air pollution has a big impact on health at all phases of life. There is a significant amount of research linking poor air quality to increased mortality and hospital admissions and there is emerging evidence that improving air quality can reverse those effects. The London Environmental Strategy 2018 notes that more than 9000 Londoners die each year as a result of air pollution.[39]

The adverse effects of air pollution fall disproportionally on disadvantaged communities, which are generally home to more minority ethnic groups. People in the most deprived areas are more likely to experience higher levels of air pollution. This is borne out in Haringey with air pollution levels in the more deprived east of the borough higher than in the west. The young, old and those with pre-existing health conditions are also particularly affected. There is increasing evidence of a link between exposure to pollution and dementia[40].

The New Local Plan will need to consider the extent to which its policies and strategies:

- reduce inequal access to clean air.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- Haringey is identified as an Air Quality Management Area and continues to face widespread exceedances of NO_2 emissions, particularly along busy congested roads
- Haringey has a well-developed existing public transport network. Recent and planned investment in the network and walking and cycling infrastructure will present opportunities to concentrate development in sustainable locations and encourage reduced dependence on private vehicles.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to reduce emissions and concentrations of harmful atmospheric pollutants; and to deliver development that does not expose current and future residents to poor air quality.

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[39] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

[40] GLA (2018) London Environment Strategy 2018 [Online] available at pg. 54 https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

3.2   Climate Change Mitigation

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- An overarching environmental objective to mitigate and adapt to climate change, including moving to a low carbon economy.
- The need to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. Shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures in line with the objectives and provisions of the Climate Change Act 2008.
- Plans should provide a positive strategy for renewable and low carbon energy sources that maximises the

potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily.
- Plans should consider identifying suitable areas for renewable and low carbon energy sources and supporting infrastructure.
- Plans should identify opportunities for development to draw energy from decentralised, renewable or low carbon energy supply systems and for co-locating potential head customers and suppliers.
- Plans should support community-led initiatives for renewable and low carbon energy.

In addition, the government has set out further planning practice guidance on climate change and renewable and low carbon energy.

The Climate Change Act 2008, as amended in 2019, sets out a national statutory target of reaching net zero emissions by 2050. There is an expectation within the NPPF that the planning system will contribute to meeting the challenges of climate change 'in line with the objectives and provisions of the Climate Change Act 2008'.

The Committee on Climate Change has produced a report entitled 'How Local Authorities can Reduce Emissions and

Manage Climate Change Risk'[41] to support realisation of the Climate Change Act's targets.

Section 19 of the Planning and Compulsory Purchase Act 2004 sets out a duty on development plans to include policies designed to secure that the development and use of land contributes to the mitigation of, and adaptation to, climate change.

The Planning and Energy Act 2008 sets out powers for local authorities to require that a proportion of the energy need related to new development is met by renewable or low-carbon generation in the locality of the development. The Act also allows local authorities to require standards for energy efficiency in new buildings, going beyond the minimum required by Building Regulations. This power has since been removed in principle, but as the government has not yet set a commencement date for the repeal this power currently remains in place, though subject to some limitations.

The Government's Clean Growth Strategy (2017) acknowledges that local areas are best placed to drive emissions reductions through their unique position of managing policy on land, buildings, water, waste and transport.

Regional
The main messages from the London Plan include:

- Policy GG6 (Increasing efficiency and resilience) seeks to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero-carbon city by 2050;
- Policy SI2 (Minimising greenhouse gas emissions) which states that major development should be net zero-carbon. The design, construction and operation of new buildings should be informed by the energy hierarchy: Be Lean (use less energy) -> **Be Clean** (supply energy efficiently) -> **Be Green** (use renewable energy) -> **Offset**, with the above steps in the hierarchy all overseen by sufficient monitoring (**Be Seen**); and
- Policy SI3 (Energy infrastructure) which states that Development Plans should (1) identify the need for, and suitable sites for, any necessary energy infrastructure requirements, including energy centres, energy storage and upgrades to existing infrastructure, and (2) identify existing heating and cooling networks, identify proposed locations for future heating and cooling networks and identify opportunities for expanding and inter-connecting existing networks as well as establishing new networks.

Climate change is a thread that runs through much of the New London Plan. Other relevant policies include GG3 – Creating a healthy city, GG4 – Delivering the homes Londoners need, G4- Open space, G5- Urban Greening, G6- Biodiversity and

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[41] CCC (2012), 'How local authorities can reduce emissions and manage climate risks [Online], available from:

https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/

access to nature, G7-Trees and woodlands, G8-Food growing, SI5-Water infrastructure, SI6-Digital connectivity infrastructure, SI17-Reducing waste and supporting the circular economy and T-Transport.

The London Environment Strategy 2018 [42] sets out an aim for London to be a zero-carbon city by 2050 with energy efficient buildings, clean transport and clean energy. One of the ways it seeks to do this is by making sure that new developments are zero-carbon from 2019, with clean energy supplies and high energy efficiency designed in from the start.

The Mayor's 1.5C Compatible Climate Action Plan[43], looks at the different scenarios London can take to reduce its emissions and reach the zero –carbon target.

A number of GLA guidance documents have also been adopted or drafted. These include the Sustainable Design and Construction SPG (2014), Energy Planning Guidance (2018 and 2020), Whole-Life Cycle Carbon Assessments Guidance (Draft 2020), Circular Economy Statement Guidance (Draft 2020), 'Be Seen' – Energy Monitoring Guidance (Draft 2020), Carbon Offset Fund Guidance (2018) and London Heat Network Manual (2014).

Local

Outcome 9 of the Borough Plan (2019-2023) is 'A healthier, active and greener place'. Objective d) of that outcome is to reduce CO_2 by 40% by 2020 and begin the journey to reduce to zero by 2050. Measure the council will take to achieve this include:

- Requiring all new development to achieve net zero operational carbon on site
- Promoting Ultra Low Emission Vehicles
- Leading on the delivery of an energy network where more sustainable energy is generated for use within the borough.

The council declared a Climate Emergency in March 2019 and in 2020 it approved a Draft Climate Change Action Plan which sets an ambitious goal for Haringey to become a zero-carbon borough by 2041. The actions outlined in this plan include setting ambitious carbon reduction planning policies in the New Local Plan and developing policies to support installation of decentralised energy networks (DENs) and connect to zero or low carbon heat sources.

Local Plan Policy SP4.1 Working Towards a Low Carbon Haringey requires all new development to be net zero carbon and Policy DM21: Sustainable Design, Layout and Construction requires new development to consider and implement sustainable design, layout and construction techniques.

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[42] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

[43] GLA (2018) 1.5C Compatible Climate Action Plan [Online] available at https://www.london.gov.uk/what-we-do/environment/climate-change/climate-action-plan

Policy SP7 looks to deliver action on climate change and create high-quality, healthy places in part by promoting sustainable transport options.

Baseline

Since 2011, Haringey has published annual carbon reports to provide an overview of its carbon emissions. The latest report (2019) covers emission trending using the latest data from the Department of Business, Energy and Industrial Strategy (BEIS)[44] from 2005 to 2017 (due to the complexity of the data collected by the Government there is an approximate 2-year lag from performance to publication). This is supplemented by data from the London Data Store, the Council's Carbon Management Team and the Association for Decentralised Energy. The data is presented below in Figure 4.

Haringey has one of the lowest emissions per capita amongst our neighbouring boroughs, at $2.5 tCO_2$capita. Its per capita figure is considerably lower than Greater London, at $3.3 tCO_2$capita, and the UK, at $4.5 tCO_2$capita[45].

Most of Haringey's emissions (50%) come from the residential sector (domestic heating and lighting). This is substantially greater than the UK as a whole for which the residential sector contributes 27% of emissions. Transport emissions make up 24% of emissions, compared with 36% for the UK, while industrial and commercial sectors comprise 26% in Haringey, compared with 37% for the UK.

Since 2005, total emissions in Haringey have decreased by 35.9%. A substantial decrease was experienced across all sectors during this period. In the latest recorded year between 2016 and 2017, emissions decreased by 6.7% in the domestic sector, 7.7% in the industrial and commercial sector, and 2.9% in the transport sector.

Decentralised Energy Networks (DENs) facilitate greener, more affordable and more reliable heat than conventional heating systems by creating large heating systems that enable consumers to take advantage of heat technologies that only work at scale.

Two DENs currently exist in the borough, one at Broadwater Farm and another at Hale Village. The planned redevelopment of St Ann's hospital in the south of the borough is also expected to include a DEN. The Council has identified three opportunity areas in the borough for DENs: North Tottenham, Tottenham Hale and Wood Green. In 2017, the Council decided to move forward with plans to create a Council-owned District Energy Network to support carbon reduction, growth and regeneration in North Tottenham.

BEIS also publishes annual statistics on renewable energy generation. The most recently published data for 2018 shows that Haringey had a renewable energy installed capacity of 2.8 megawatts, generated completely from photovoltaics (solar panels). This puts the borough in 22nd place out of the 32 London Boroughs.

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[44] Haringey Council, 'Annual Carbon Report 2019'

[45] 2019 Carbon Report

Projections

In 2018 ARUP was commissioned by the Council to produce a Technical Report that contained projected future carbon emissions under "business as usual" and "zero-carbon" scenarios.

For residential emissions, the 'business as usual' scenario demonstrated a 25% increase[46] in energy use between 2015 and 2050, assuming a low uptake of energy efficiency improvements to existing and new buildings. The increase was largely driven by new residential development (see Figure 5 below). In contrast, the zero carbon scenario saw an overall reduction in energy use.

The same model predicted little change in emissions from transport under the 'baseline' scenario between 2015 and 2050, compared with a 97% reduction in emissions from road transport and 70% from non-road transport. (see Figure 6 below).

Overall, the report noted Haringey's progress to date but that actions to combat emissions needed to be scaled up in order to meet zero carbon aspirations by 2050.

Current plans indicate progress in the creation of new DENs, with a business case for a North Tottenham DEN already in development and another being developed for Wood Green.

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[46] Haringey Council 'Draft Climate Change Action Plan 2020'

Figure 4 Haringey's carbon reduction performance compared with neighbouring boroughs

Haringey 2020 Target is 624.8 kilotonnes

Legend:
- Haringey
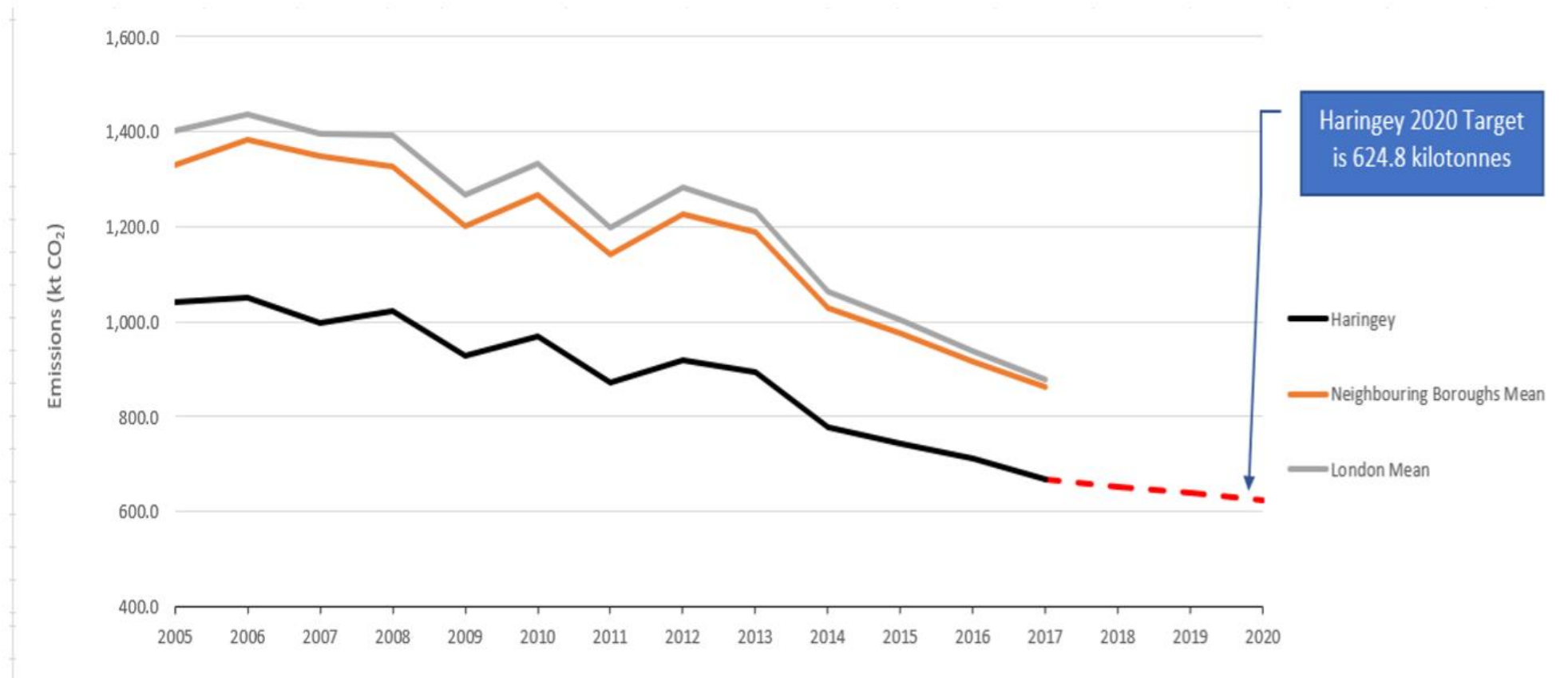- Neighbouring Boroughs Mean
- London Mean

Figure 5 Comparison of energy demand between high uptake and low update of energy efficiency

Figure 6 Comparison of carbon emission reduction in the transport sector between "near zero scenario (left) and "baseline" scenario (right), measured in megatons of CO_2e
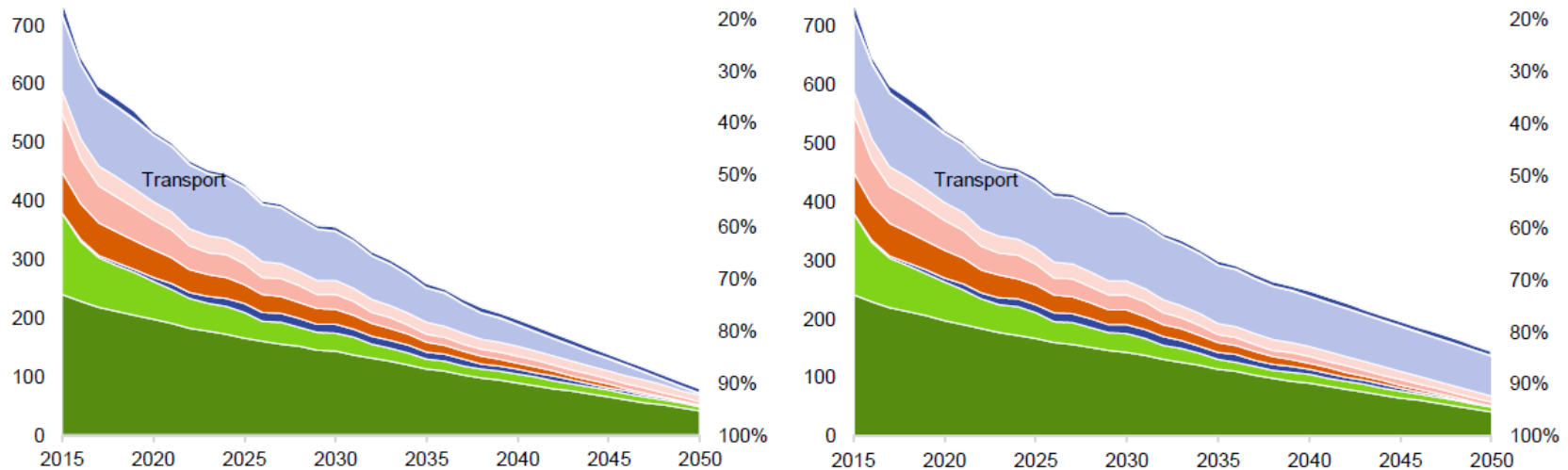
Health and Equalities Impacts

The health impacts of climate change can be particularly adverse in an urban environment like Haringey. More frequent heat waves will be intensified due to the urban heat island effect and buildings that have not been designed for higher temperatures.

The elderly and those with pre-existing chronic disease are at greater risk of heat-related deaths. The risk of injury or death is also greater for some worker groups, such as drivers and construction workers, due to occupational heat exposure[47].

In addition, future extreme weather (floods, heatwaves and possibly storms) have the potential to damage health system infrastructure and affect the delivery of health services. The costs of heating energy inefficient homes is a significant concern for many Londoners, and particularly for low-income or unemployed residents. In 2015 10.1% of all households in the city were living in fuel poverty. There is increasing evidence of poor health outcomes associated with living in a cold home for all age groups. It is estimated that around 10% of excess winter deaths are directly attributed to fuel poverty[48]. For children, living in cold, damp and mouldy homes can mean that they are almost three times more likely to suffer from respiratory illness, such as asthma. This can also impact on their performance at school.

The New Local Plan will need to consider the extent to which its policies and strategies:

- contributes to the provision of smart and affordable energy systems; and
- reduce the impact of fuel poverty, particularly for vulnerable groups.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:
- Haringey is experiencing falling emissions, however, significantly more needs to be done to meet national, regional and local emission reduction targets
- Domestic energy use comprises half of emissions in the borough.
- Modelling indicates that there are also significant opportunities to make emissions reductions in the transport sector
- There are significant opportunities to further develop the borough's DENs

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:
- to support reductions in greenhouse emissions to meet national, regional and local net zero carbon targets; and
- to support renewable and low carbon energy generation.

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[47] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

[48] Ibid, pg. 228.

3.3 Climate Change Adaptation

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- An overarching environmental objective which includes contributing to protecting and enhancing our natural environment, using natural resources prudently, minimising waste and pollution and adapting to climate change.
- Strategic policies should make sufficient provision for infrastructure for water supply and flood risk.
- Planning policies should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution.
- Ensure that development, wherever possible, helps to improve water quality, taking into account relevant information such as river basin management plans.
- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures in line with the objectives and provisions of the Climate Change Act 2008.

- Plans should take appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.
- Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Strategic policies should be informed by a strategic flood risk assessment and should manage flood risk from all sources.
- All plans should apply a sequential, risk-based approach to the location of development – taking into account the current and future impacts of climate change – so as to avoid, where possible, flood risk to people and property.

The UK Climate Change Risk Assessment is published on a 5-yearly cycle in accordance with the requirements of the Climate Change Act 2008. It requires the Government to compile an assessment of the risks for the UK arising from climate change, and then to develop an adaptation programme to address those risks and deliver resilience to climate change on the ground. For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-

Committee commissioned an evidence report[49] containing six priority risk areas requiring additional action in the next five years, including:

- flooding and coastal change risks to communities, businesses and infrastructure;
- risks to health, well-being and productivity from high temperatures;
- risk of shortages in the public water supply, and for agriculture, energy generation and industry;
- risks to natural capital, including terrestrial, coastal, marine and freshwater ecosystems, soils and biodiversity;
- risks to domestic and international food production and trade; and
- new and emerging pests and diseases, and invasive non-native species, affecting people, plants and animals.

The Flood and Water Management Act (2010)[50] sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; rolling back development in coastal areas to avoid damage from flooding or coastal erosion; and creating sustainable drainage systems (SuDS).

The Committee on Climate Change published a 2012 report entitled 'How Local Authorities can Reduce Emissions and Manage Climate Change Risk'[51] which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from a number of local authorities.

Regional

The main messages from the London Plan include:

- Policy GG6 (Increasing efficiency and resilience) which looks to ensure that buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water and reducing negative impacts;
- Policy SI4 (Managing heat risk) which requires all development proposals to minimise the urban heat island effect and for major development proposals to demonstrate a reduction in the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy;
- Policy SI12 (Flood Risk Management) which requires current and expected flood risks from all sources to be

[49] DEFRA (2017): 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from:
<https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>
[50] Flood and Water Management Act (2010) [online] available at:
http://www.legislation.gov.uk/ukpga/2010/29/contents

Accessed Aug 2017
[51] CCC (2012), 'How local authorities can reduce emissions and manage climate risks', [online]; available from:
https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/

managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure developers.

- Policy SI13 (Sustainable Drainage) which requires Lead Local Flood Authorities through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

The London Environment Strategy (2018) (Chapter 8: Adapting to Climate Change) identifies a range of issues likely to be affected by climate change, setting out key threats, including flooding, higher temperatures and water scarcity, along with potential adaptations and mitigations to these.

Local
Local Plan Policy DM24: Managing and Reducing Flood Risk looks to ensure that all proposals for new development to avoid and reduce the risk of flooding to future occupants and not increase the risk of flooding. Local Plan Policy DM25: Sustainable Drainage Systems requires all new development to seek to manage surface water as close to its sources as possible and sets various requirements for the incorporation of Sustainable Drainage Systems into new development.

Local Plan Policy DM28: Protecting and Enhancing Watercourses and Flood Defences: includes requirements for development to be set back from watercourses, meet the objectives of the Thames River Basin Management Plan and secure environmental enhancements and avoid a deterioration in water quality.

A Level 1 Strategic Flood Risk Assessment (SFRA) was commissioned as part of a joint North London SFRA in 2008. A Level 2 SFRA was subsequently produced for the borough in 2013 and later updated in 2015.

The Level 1 SFRA provides a strategic overview of areas of risk and potential mitigations in the Borough. The Level 2 SFRA is a more detailed assessment which explores flood risk and mitigation at a site-specific scale.

The Haringey Surface Water Management Plan (2011) (SWMP) outlines the preferred surface water management strategy for the borough. The Council has recently adopted a Flood Risk Management Strategy as part of their statutory obligation as Lead Local Flood Authority to develop, maintain, apply and monitor a strategy for local flood risk management.

Local Plan Policy DM21: Sustainable Design, Layout and Construction states that proposals should apply the cooling hierarchy to reduce the potential for overheating and limit reliance on mechanical air conditioning systems.

Baseline
Like most London boroughs Haringey has areas that are at risk of flooding. This is in part owing to the watercourses in the borough, including the River Lee, Pymmes Brook and Moselle Brook. According to the Environment Agency, approximately

9% of land in Haringey has a 1 in 100 year probability of flooding from rivers. The main sources of flooding are:

- Flooding from surface water
- Flooding from main rivers and ordinary watercourses
- Flooding from groundwater

Haringey's Strategic Flood Risk Assessment has identified surface water run-off as the greatest risk to the borough with regard to flooding. The SWMP identifies nine Critical Drainage Areas in the borough at risk of surface water flooding, and sets the basis for bespoke water management policy approaches and projects in these areas.

There is also significant residual risk as a result of reservoir breach effecting large areas of the borough which is much less likely to be experienced, but the consequences of such a breach would be significant.

Projections

New development has the potential to increase flood risk through factors such as changing surface and ground water flows, overloading existing inputs to the drainage and wastewater networks or increasing the number of residents exposed to areas of existing flood risk.

Climate change will bring about changes in rainfall with warmer

drier summers and wetter warmer winters. Rainfall may occur in heavier downpours which could lead to more flooding and droughts. The UK Climate Projections 2009 predict that by 2080 the East of England will experience a 20% increase in winter rainfall leading to increased winter flooding and a 20% decrease in summer rainfall leading to summertime droughts[52].

Widespread implementation of sustainable drainage systems could help reduce the risk from surface water run-off, though it will continue to be important that new development avoids introducing large new areas of non-permeable hardstanding where possible.

The London Environment Strategy (2018) identified as a projected 5-6 degree increase in summer and winter averages by 2050[53]. This will have an impact on health, infrastructure, comfort and the operation of the city.

Health and Equalities Impacts

The health impacts of climate change can be particularly adverse in an urban environment like Haringey. More frequent heat waves will be intensified due to the urban heat island effect and buildings not having been designed for higher temperatures.

The elderly and those with pre-existing chronic disease are at greater risk of heat-related deaths. The risk of injury or death

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[52] Met Office ' UK Climate Projections 2009',
https://www.metoffice.gov.uk/research/approach/collaboration/ukcp/index

[53] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

is also greater for some worker groups, such as drivers and construction workers, due to occupational heat exposure.

In addition, future extreme weather (floods, heatwaves and possibly storms) has the potential to damage health system infrastructure and affect the delivery of health services.

The costs of heating energy inefficient homes is also a big issue for many Londoners, particularly low income/ no income residents. In 2015 10.1% of all households in the city were living in fuel poverty. There is increasing evidence of poor health outcomes due to living in a cold home for all age groups. It is estimated that around 10% of excess winter deaths are directly attributed to fuel poverty. For children, living in cold, damp and mouldy homes can mean they are almost three times more likely to suffer from respiratory illness. It can also have in impact on their performance at school.

London is one of the driest capitals in the world. Climate change could reduce the amount of available water, while increasing demand.

Risk of more surface flooding and higher demand on the grid during extreme weather events will result in more power outages.

The New Local Plan will need to consider the extent to which its policies and strategies:

- ameliorate the impact of flooding and overheating, particularly for those most vulnerable to its effects.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- Surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced.
- Increased use of sustainable urban drainage systems provides an opportunity to manage and mitigate flood risks as does directing residential development away from the areas of highest risk.
- Haringey will continue to experience higher temperatures and more frequent heat waves.
- There is an opportunity to be proactive in ensuring the built and natural environment is designed in a way that keeps inhabitants and the surrounding area cool during hot weather.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to adapt to current and future flood risk; and
- to minimise the potential for overheating.

3.4 Water Resources and Water Quality

National

The main messages from the National Planning Policy Framework (NPPF) include:

- taking a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for water supply;
- preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by unacceptable levels of water pollution; and
- ensuring that, wherever possible, development helps to improve local environmental conditions including water quality, whilst considering relevant information such as river basin management plans.

Under the Water Framework Direction (2000), river basin management plans are to be prepared for water catchment areas to meet objectives such as improved water efficiency and sustainable drainage. River basin management plans (RBMPs) set out how organisations, stakeholders and communities will work together to improve the water environment. There are eight RBMPs in England which all have a harmonised plan period of 2015-2021. Haringey sits within the Thames River Basin District.

The RBMPs are in the process of being updated, with consultation currently underway. Draft plans are anticipated to be published this year (2020).

Regional

The Thames River Basin Management Plan (2015) identifies the priority issues for the Lower Lee South catchment as being water quality, biodiversity, and raising awareness of the rivers of the catchment and how we impact them.

The main messages from the London Plan include:

- Policy SI 5 (Water infrastructure) which requires Development Plans to A) promote improvements to water supply infrastructure to contribute to security of supply B) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and take account of Catchment Plans C) support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Development Plans should be informed by Integrated Water Management Strategies at an early stage;
- Policy SI12 (Flood Risk Management) which requires current and expected flood risks from all sources to be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure developers;
- Policy SI13 (Sustainable Drainage) which requires Lead Local Flood Authorities, through their Local Flood Risk

Management Strategies and Surface Water Management Plans, to identify areas where there are particular surface management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed; and

- Policies SI 14-17 London's waterways: These policies set out how Development Plans should address the strategic importance of London's network of waterways, including protecting and enhancing the use of water transport, general use and enjoyment of the waterways and by supporting river restoration and biodiversity improvements.

The London Environment Strategy (2018) includes an outcome of a cleaner London with cleaner water to protect the health of Londoners and contributes to the fight against climate change. It also looks for London to be ready for the future, by not wasting valuable resources.

Local
Local Plan SP5: Water Management and Flooding requires all development in Haringey to be water efficient during construction and operation and to reduce all forms of flood risk

Policy DM25: Sustainable Drainage Systems requires all new development to seek to manage surface water as close to its sources as possible and sets various requirements for the incorporation of Sustainable Drainage Systems into new development.

Through Policy DM27: Protecting and Improving Groundwater Quality and Quantity, the Council seeks to protect and improve the quality and quantity of groundwater resources within the Borough.

Policy DM28: Protecting and Enhancing Watercourses and Flood Defences: includes requirements for development to be set back from watercourses, meet the objectives of the Thames River Basin Management Plan and secure environmental enhancements and avoid a deterioration in water quality.

Baseline
The River Lee downstream of Tottenham Lock has poor chemical and biological water quality. This is partly due to the confluence of the River Lee and Pymmes Brook at Tottenham Lock. Pymmes Brook has historically poor chemical water quality and Haringey is working closely with other boroughs to improve this.

The Thames Water Resources Management Plan 2019 notes that the Thames basin is one of the most intensively used water resource systems in the world. It sets out a preferred plan to address a significant supply-demand deficit in London against the dry year annual average demand in the planning period through to 2100. The resilience of supply could potentially be affected by extreme weather events and climate change patterns as well as technical challenges such as leakage.

Haringey is in the London Water Resource Zone which is supplied primarily (80%) from surface water resources of the River Thames and River Lee, either directly or via storage reservoirs. The remainder of the supply is made up of groundwater abstractions, particularly from the chalk aquifer under south east London.[54]

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

Thames Water provides the wastewater services for Haringey. All water companies are now committed to preparing Drainage and Wastewater Management Plans (DWMP) for the first time. The Thames DWMP will be ready for consultation by summer 2022. Haringey falls into two catchments. Most of the borough is in a catchment served by the Deephams Sewage Treatment Works, with the south-western part of the borough served by the Beckton Sewage Treatment Works. A screening exercise in 2019 identified both catchments as high priority areas as they breached 10 and 12 of the 17 indicator thresholds respectively. The indicators looked at flooding, pollution and sewage treatment work quality compliance [55]

Both catchments have been identified as a high priority area for intervention due to the number of key indicator thresholds breached.

Projections

The Thames Water - Water Resource Management Plan 2020-2100 predicts a substantial shortfall of 387 million litres per day by 2045 or around 2.7 people without water a day if action is not taken. It is predicted that climate change will reduce available supplies by around 180 million litres a day in London by 2085.

Health and Equalities Impacts

Access to clean water is important for the health and wellbeing of residents. If access to clean water becomes limited in any way it is likely that our most vulnerable groups would be disproportionately affected.

Water quality also has a bearing on the environmental condition of our waterways and in turn the ability of people to benefit from access to healthy waterways and improve their physical and mental health.

The New Local Plan will need to consider the extent to which its policies and strategies:

- improve access to our waterways.

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[54] Thames Water (2019), 'Shape your water future- Our Water Resources Management Plan 2020-2010)

[55] Thames Water, https://storymaps.arcgis.com/stories/201050209c7a4658a1c2265aa4411375

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- Haringey is located within an area of water stress where demand is high and supply is subject to constraints.
- The presence of Source Protection Zones in the borough means that development in some locations could have potential to contaminate water supplies without mitigation.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- Minimise pressure on water resources, water consumption and wastewater flows; and
- Maintain and enhance water quality in line with the aims of the Water Framework Directive and Thames River Basin Management Plan.

3.5 Biodiversity and Open Spaces

Context

National

The National Planning Policy Framework (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.
- Distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value […], take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape across local authority boundaries.
- Promote the conservation, restoration and enhancement of priority habitats, ecological networks and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity.

The NPPF also 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.

Regional

The main messages from the London Plan include:

- the need to 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;
- the need to protect Green Belt and Metropolitan Open Land;
- priority to be given to achieving Biodiversity Action Plans (BAP) targets and supporting sites within or near to areas deficient in accessible wildlife sites;
- Policy G6 (Biodiversity and access to nature) of the London Plan states that Sites of Importance to Nature Conservation (SINCs) should be protected but also stresses that development plan policies should "support the protection and conservation of priority species and habitats that sit outside of the SINC network";
- Policy G7 (Trees and woodlands) notes the importance of trees within the urban environment, with biodiversity functions being delivered through the provision of "extensive areas of habitat for wildlife, especially mature trees"; and
- the London Plan also requires new development to include formal play provision on-site and provide at least 10 square metres per child to address child occupancy and play space requirements generated by a development proposal.

Local Plan

Policy DM 19 and 20 of the adopted Local Plan seeks to enhance green infrastructure, biodiversity and assist ecological restoration, with key messages including that the Council will:

- Protect and safeguard open space including Metropolitan Open Land and Green Belt.
- Establish a network of multi-functional open spaces as part of the London Green Grid.
- Secure new open space on large development sites.
- Enhance biodiversity across the Borough.
- Support the provision of new play space and recreation facilities.

Baseline

The borough has 60 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.

There are areas of Green Belt along the Lee Valley corridor in the east of the Borough, and substantial areas of Metropolitan Open Land such as Alexandra Park, Finsbury Park, and Highgate and Queens Wood.

With regards to recreational open space, there are 35 public parks and open spaces in the Borough, including historic spaces such as Queens Wood and the renowned Alexandra Palace Park. These accommodate the majority of the borough's 91 playing pitches for cricket, football, rugby league and rugby union. However, in certain wards particularly in the east of the borough there is limited access to open space and recreational grounds including play space.

The borough has an overall provision of 1.7 ha of open space per 1,000 of population. Haringey's 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces.

The Lee Valley presents a significant recreational asset, which with better access to it, could serve a much wider section of our community including those areas in the east of the borough with deficiencies in access to open spaces.

Projections
The New Local Plan will need to accommodate higher housing and growth targets than before, and so an increased population, particularly in the east of borough could have an adverse effect on existing open spaces, and the Lee Valley Regional Park, as an important biodiversity resource.

Some parts of the east have poor access to open space and it is difficult to deliver new open space as the borough is substantially built up and this would require the demolition of some buildings. Intensive use of existing green and open spaces could affect their biodiversity and amenity value and lead to a decline in their quality and integrity leading to negative effects. It is noted that the Lee Valley is set to benefit from increased accessibility through enhanced east/west connections.

On the plus side, the increased scale of development could fund strategic investment in green infrastructure (including the Green Grid) to help create a resilient network of green corridors and improve open space. This would lead to positive effects compared to the baseline, particularly when focused in the east of the borough.

Requirements for new development to deliver a net gain for biodiversity will likely lead to positive impacts, and so projections for biodiversity overall should be good.

Health and Equalities Impacts

Environmental quality is an important 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 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 or access to open space). Environmental issues are more concentrated in certain parts of the borough and whilst open space is fairly evenly distributed across the borough, there is a lack of access in certain parts of the east, including to play space and allotment which can have impacts on health.

The New Local Plan will need to consider the extent to which its policies and strategies:

- Improve access to open space and areas of biodiversity interest
- Reduce deficiencies in open space and play space

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

Haringey has significant areas of protected open space and biodiversity rich environments, including 5 local nature reserves, adjacent to a SSSI, and 60 SINCs. These assets need to be protected and enhanced.

There is also a need to deliver a network of high quality, accessible open spaces across Haringey especially in areas deficient in access to open space. Haringey has decent existing accessibility to the wider natural environment however, this will need to be enhanced whilst securing the most open space viable from redevelopment sites, including pocket parks and civic spaces. Securing new play space to ensure all areas have access to decent play areas, and that new developments make provision for play space to meet the needs arising from the new development.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to achieve biodiversity net gain;
- to secure an increase in open space and play space across the borough;
- to reduce deficiencies in open space and play space; and
- to protect open space and biodiversity.

3.6 Land and Soils

Context

National

The National Planning Policy Framework (NPPF) encourages the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value. In also 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.

Additionally, the NPPF says planning policies should contribute to and enhance the natural and local environment by:

- protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;
- recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
- promoting an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.

The 'Safeguarding our Soils' strategy (2009) highlights the vital role soils play in supporting ecosystems, facilitating drainage and providing urban green spaces for communities.

Regional

The main messages from the London Plan include making the best use of land. It notes that rapid growth will bring many opportunities but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, the Plan proposes more efficient uses of land. These are set out within Good Growth Objective 2 Making the best use of land and are a key theme across the entire plan.

Policy SI10 (Aggregates) recognises the importance of ensuring an adequate supply of aggregates to support construction activities in London. There are no specific requirements of or implications for Haringey.

The 2018 Local Aggregate Assessment for London provides an overview of essential aggregates and minerals supply in London, identifying that only four of the 33 London boroughs (Havering, Hillingdon, Hounslow and Redbridge) have land-won aggregates.

Local

Local Plan Policy SP1 seeks to accommodate development in the most appropriate locations, and thus make the best use of land. Detailed Development Management policies consider the impact on soil and contamination to ensure where land is

contaminated it is remediated, and to avoid future negative impacts on the environment.

Baseline

Haringey's industrial history has left a legacy of contamination. Haringey's Contaminated Land Strategy identified potentially contaminated sites in the borough – the last major contaminated site at the former Clarendon Gas Works site is now being redeveloped and has been remediated. The Former Friern Barnet sewage works remains overgrown.

There are no active aggregate depots and no mineral excavation sites in the Borough. In land use terms Haringey is predominantly urban, meaning that the majority of land in the borough is therefore not in agricultural use (except for allotments). The majority of undeveloped land is made up of parks, playing fields, golf courses and woodland.

Projections

Given the demand for new housing and other development, it is likely that sites with contamination will in time be remediated to accommodate new development, and that with this pressure, efficient land uses will continue.

Health and Equalities Impacts

Remediation of land and the efficient use of it will benefit all, but particularly those with health issues who may be more vulnerable to land contamination should they come across it.

The New Local Plan will need to consider the extent to which its policies and strategies:

- enable remediation of land to ensure the safety and protection of the most vulnerable.

Issues, opportunities and objectives

The following key issues emerged from the context and baseline review:

- Brownfield sites should be prioritised as sites which offer the greatest capacity for development. Previously developed land (PDL) within Haringey accounts for approximately for 3% of London's total PDL area.

- A variety of industrial land uses have left behind contamination in the borough, which may need to be remediated before development. The Borough's Contaminated Land Strategy identifies potentially contaminated sites in the borough.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- promote the efficient and sustainable use of land and natural resources.

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3.7 Townscape and Landscape

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- Giving greater weight to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty.

- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure.

- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities)'.

- Planning policies and decisions should contribute to and enhance the natural and local environment by:

  o protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils;

  o recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and

  o remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Regional

The main messages from the London Plan include;

- Policy G3, supporting the designation of Metropolitan Open Land where it contains features or landscapes of either national or metropolitan value;

- Policy HC3, protecting strategic views of significant buildings, urban landscapes or riverscapes that help to define London at a strategic level;

- Policy HC4, identifying and designating local views using the principles of the London View Management Framework, within Local Plans and strategies.

Local

Policy DM5 of the Local Plan identifies and protects locally significant views and vistas while Policy DM6 sets out expectations for building heights including ensuring that taller buildings preserve existing locally important and London-wide strategic views.

The Haringey Urban Character Study (2015) is a key evidence document that informs the existing Local Plan. The Council is also considering developing a Local Views Assessment Study.

Baseline

The Haringey Urban Character Study (2015) identifies two broad landscape typologies in the borough.

- Most of the borough can be classified as urban, where the once rural settlement pattern has been completely subsumed by urban development.
- The Lee Valley part of Tottenham can be classified as lowland wetlands, land below 300ft, valley, associated with Mesozoic or Tertiary rocks of sedimentary origin, and glacial or fluvial drift.

The borough is not in close proximity to any Areas of Outstanding Natural Beauty.

The above landscape characters have had a visible impact upon settlement patterns over the centuries. From the early clearings of heavily wooded areas where small settlements (such as Wood Green) grew, to the (relatively) flat, easily navigable land where the High Road passes through Tottenham, to the open marshland of the Lee River Valley which developed later due to the inhospitable landscape.

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

Projections

New development within the Haringey could have potential to lead to incremental changes in landscape and townscape quality in the Borough, particularly in and around the Lea Valley, town centres, and with regard to significant local and strategic views.

New development has the potential to negatively affect the visual impact of landscape features. Sensitively designed development could, however, complement and enhance these landscape features.

Health and Equalities Impacts

The protection and enhancement of significant landscape features and their enjoyment will benefit all residents.

The New Local Plan will need to consider the extent to which its policies and strategies:

- help to build a sense of place to promote social integration.

Issues, Opportunities and Objectives

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to protect and enhance the character, quality and diversity of the borough's landscapes and townscapes.

3.8 Design

National

The National Planning Policy Framework (NPPF) highlights the importance of well-designed places, and that design should be inclusive. Inclusive design should be adopted to address the needs of older and disabled people.

A key change that is likely to come into effect during this new Local Plan, is that a National Model Design Code is set to be published to set a baseline standard of quality and practice across England which local planning authorities will be expected to consider when developing local design codes and guides and when determining planning applications.

Regional

The London Plan contains a series of design policies seeking to ensure high-quality design whilst enabling Haringey to meet its borough-wide growth requirements. A key change in the new London Plan is that it no longer includes a density matrix for residential development. Instead it requires boroughs to optimise site capacity through a design-led approach that makes the best use of land.

It also supports the use of modern methods of construction (MMC) to enable faster housing construction. MMC could provide a cheaper supply of housing, offer greater construction quality control and help to meet the scale and pace of housing delivery required.

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.

Local

The Council has a robust and positive framework for ensuring new development results in high quality design. Local Plan Policy DM1 sets out the criteria for achieving this, including ensuring landscaping, privacy and amenity, and existing character are taken into account. Policy DM 2 and 3 require new development to result in safe and accessible design, and that the public realm is enhanced.

Baseline 📊

To further champion good design in the borough and celebrate development of the highest quality the Council holds the Haringey Design Awards every two years. The awards cover a broad range of categories and are next scheduled for 2021.

In June 2020 the Council adopted the Haringey Housing Design Principles to provide design guidance for new council homes as part of the Council's programme of delivering 1000 affordable homes at Council rent by 2022.

To assist in delivering high quality development the Council has established a Quality Review Panel (QRP) which brings together a team of independent built environment professionals from a range of backgrounds to scrutinise major and controversial development proposals. The QRP advises

applicants, Council officers and the Planning Committee on their consideration of how successfully proposals for development meet the principles of the Haringey Development Charter.

Projections

Given the increase in housing demand in the Borough, higher density, some taller buildings may be required to make efficient use of land. Additionally, small sites may provide an increasing source of housing supply, and so the design of these will be crucial to ensuring that the character of places evolve positively. Requirements for accessible design, including inclusive public realm, will continue to play an important part of future design.

Health and Equalities Impacts

Accessibility is an important 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). Good design of new buildings and the public realm can help to improve access to town centre facilities and community infrastructure for existing and future residents, and provide homes that are fit for purpose.

The New Local Plan will need to consider the extent to which its policies and strategies:

- build a sense of place to promote social integration; and
- improve legibility and ease of use of the built environment for disabled people.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- New design guidance may need to be introduced to ensure design excellence and to successfully integrate new developments into existing contexts.

- The New Local Plan needs to optimise densities and deliver densification for the borough in order to meet its growth targets.

- Public spaces and buildings need to foster accessibility and inclusivity, as well as community cohesion and interaction, w a high standard of amenity for existing and future users all across the borough.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to support excellent design that is accessible and inclusive.

3.9 Heritage and Culture

Context

The main messages from the National Planning Policy Framework (NPPF) include:

- The historic environment should be conserved and enhanced. Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats.
- An overall objective to support vibrant communities with a well-designed and safe built environment, accessible services and open spaces that support communities' cultural well-being.
- Strategic policies in local plans should look to make sufficient provision for cultural infrastructure and conservation and enhancement of the built and historic environment.

Regional

Policies HC1-7 in the London Plan deal with heritage and culture. The policies set out that Development Plans should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This should be used to inform the effective integration of London's heritage in regenerative change. Boroughs are expected to include all designated views, including the protected vistas, in their Local Plans and clearly identify local views.

The continued growth and evolution of London's diverse cultural facilities and creative industries should be supported, and boroughs are encouraged to work with the Mayor and relevant stakeholders to identify Creative Enterprise Zones in Local Plans. Plans should look to support the night-time economy and protect public houses where appropriate.

Local

Policy SP12 of the Local Plan looks to ensure the conservation of the historic significance of Haringey's heritage assets, their setting and the wider historical environment. The Historic Environment should be used as a basis for heritage-led regeneration as the basis for good design and positive change. Policies DM5 looks to protect locally significant views and vistas, while Policy DM9 sets out how management of the historic environment should occur.

Baseline

Haringey has a wealth of heritage assets including 28 conservation areas, 286 statutory listed buildings, 1,177 locally listed buildings and structures, 36 historic parks and gardens, 22 designated sites of industrial heritage, 22 areas of archaeological importance, one strategic view and 44 local views. Haringey also has 7 Conservation Area Advisory Committees which help the Council to manage and protect the historic environment. They assist us in the formulation of

policies and guidance for their respective Conservation Areas and provide advice and updates on issues and challenges.

Our Draft Local Heritage List is currently under review and we have a programme for preparing Conservation Area Appraisals and Management Plans (CAAMPs) for all of our Conservation Areas. Haringey currently has 14 adopted appraisals which have been performing well, including four recently adopted in 2019. Work has also commenced on a further seven Conservation Area appraisals for: Trinity Gardens, Wood Green Common, Bowes Park, Muswell Hill, St Ann's, Lordship Lane and Clyde Circus.

The Council is also working with the Greater London Archaeological Advisory Service to review its Archaeological Priority Areas.

There are currently 14 buildings and historic structures and 5 conservation areas on the Historic England Heritage at Risk Register (2019) (in 2018 there were 16 entries).

The borough benefits from good cultural infrastructure, including:

- Over 120 venues where cultural activity take place
- Over 70 annually occurring cultural events
- More than 2,700 creative and cultural industry enterprises in Haringey making a key contribution to the local economy. Many of these are concentrated in key growth and regeneration areas like Wood Green and Tottenham
- The Wood Green Cultural Quarter is an innovative creative hub comprising many artists, studios and small business units
- Warehouse Living sites in the east of the borough are home to a large number of creative enterprises
- There is a quickly growing creative cluster in South Tottenham focused around the Markfield Road area

In early 2020, Tottenham became one of six London areas to be designated a Creative Enterprise Zone (CEZ) by the Mayor. The creative industries are now Tottenham's fastest growing sector, experiencing growth of 125% over the past five years and accounting for 4,400 jobs and 660 businesses.

CEZ funding will go towards supporting and strengthening a cluster of fashion and furniture manufacturing creative businesses and is estimated to create an additional 300 new jobs, generating growth of around £26 million.[56]

Projections

Future growth in Haringey provides both challenges and opportunities for Haringey's historic and cultural environment. There will likely be increasing pressure for higher density development in areas where there are significant heritage and cultural assets. This is particularly the case in and around the

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[56] https://www.haringey.gov.uk/news/haringey-creative-boosts-announced-2019

Tottenham High Road Conservation Areas where regeneration is ongoing.

New development could negatively impact heritage assets through inappropriate design and layout but also offers opportunities for enhancement through effective integration of local heritage as part of regenerative change. Increased levels of density could provide an opportunity to increase the patronage of local cultural infrastructure and new development, particularly in and around town centres, offering an opportunity to create new cultural spaces.

Existing historic environment designations and the policies of the NPPF will continue to offer a degree of protection to heritage assets and their settings.

The past decade has seen a London-wide trend of cultural venues and spaces closing down. This includes a 25% reduction in the number of pubs, which are often used as community hubs and have rooms to rent for social functions or meetings. Rising rents also add pressure on existing venues.

Health and Equalities Impacts

Heritage should be for everyone. The national 2018 'Taking Part Survey'[57] collected data on which groups get the most benefit and enjoyment from visiting heritage sites. It identified large disparities between some groups in how likely they were to have visited a heritage site in the past year. Adult Londoners were much less likely to have visited a heritage asset (57.1%), compared with those in the South East (81.5%). Nationally, those of 'White' ethnicity (75.4%) were much more likely than ethnicities described as 'Asian' (56.3%) or 'Black' (42.3%), and homeowners (78.7%) were significantly more likely than social renters (50.7%).

The planning system provides tools that protect tangible heritage in the form of buildings and structures, however, there are limited statutory tools for preserving and enhancing the intangible cultural heritage of communities. More work needs to be done to identify, understand and protect the recent histories of Haringey's diverse migrant communities.

The Council recently began a Review on Monuments, Building, Place and Street Names in Haringey as locally we are keen to ensure that the history of our monuments, building, place and street names are reflective of our values and the culture and diversity that we are so proud of in our borough. As part of the Review, we will be working with residents, community groups and organisations, and local experts to understand and address the history of the borough.

The New Local Plan will need to consider the extent to which its policies and strategies:

- improves the equality of access to and engagement with local heritage assets and cultural activities.

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[57] Department for Digital, Culture, Media & Sport (2019), 'Taking Park 2018/19: statistical release,

https://www.gov.uk/government/statistics/taking-part-201819-statistical-release

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- Haringey has a wealth of heritage and cultural assets
- There are currently 11 buildings and historic structures, 3 places of worship and 5 conservation areas on the Historic England Heritage at Risk Register (2019).
- The Tottenham High Road Conservation Areas are at particular risk given anticipated growth pressures, however, there are opportunities for heritage-led regeneration in this area.

In light of the key issues discussed above it is proposed that the IIA includes the following objectives:

- Protect, conserve and enhance designated and non-designated heritage assets, and contribute to the maintenance and enhancement of historic character

3.10 Transport

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:

- the potential impacts of development on transport networks can be addressed;

- opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised;
- opportunities to promote walking, cycling and public transport use are identified and pursued;
- the environmental impacts of traffic and transport infrastructure are identified, assessed and taken into account; and
- patterns of movement, streets, parking and other transport considerations are integrated within the developments, and contribute to making high quality places.

Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.

Regional

The main messages from the London Plan include:

- Development Plans should support the transport schemes identified in the London the delivery of the Mayor's strategic target that 80% of all trips in London will be made on foot, cycling or via public transport by 2041.
- Development Plans should make the most effective use of land.
- Development plans should promote and support the application of the Mayor's Healthy Streets Approach.

The Mayor's Transport Strategy (2018) sets out a number of specific targets that the New Local Plan should help deliver, these include:

- significantly reducing nitrogen dioxide emissions to 20 tonnes per year and particulate matter emissions to 19 and 2 tonnes per year for PM10 and PM2.5 respectively;
- at least 88% of daily journeys will include walking, cycling and public transport;
- at least 70% of residents will do at least 20 minutes of active travel every day by 2041;
- eliminating deaths or serious injuries and the transport network (Vision Zero); and
- reducing step-free journey time by 75% by 2041 based on 2015 levels.

Local

Haringey's Transport Strategy (2018) sets out a vision to deliver "a transport system that matches our growth and prosperity ambitions, whilst also improving our environment, providing accessible choices and making walking, cycling and the use of public transport a first choice for all".

The vision will be achieved through four outcomes, which align with and assist to deliver the Mayor's Transport Strategy.

- Outcome 1: A public transport network that is better connected, has greater and more efficient capacity and is more accessible, supporting our growth ambitions.
- Outcome 2: Active travel as the default choice, with more people choosing to travel by walking or cycling.

- Outcome 3: Improved air quality and a reduction in carbon emissions from transport.
- Outcome 4: A well maintained road network that is less congested and safer.

Local Plan Policy SP7 (Transport) sets out to deliver regeneration and access by working with partners to promote key infrastructure proposals that will enable Haringey's regeneration and local and strategic access to London, employment areas and local services. It also seeks to deliver action on climate change and create high-quality, healthy places supported by promoting sustainable transport options.

The Local Implementation Plan 2019-2022 details proposals for implementing the Mayor's Transport Strategy within Haringey.

Baseline

Public Transport

Haringey benefits from good radial public transport links connecting the borough with Central London. It has stations on three London Underground lines; the Northern, Piccadilly and Victoria lines, as well as being served by London Overground and National Rail services.

Of the above, all provide radial links aside from the Barking – Gospel Oak Overground line which, together with five other London Overground routes, forms an orbital network, and links the Borough to a total of 84 stations and 19 London Boroughs via the Overground services alone. Finsbury Park, Tottenham

Hale and Seven Sisters/South Tottenham are identified as key strategic interchanges in the Mayor's Transport Strategy.

There is limited rail infrastructure and low public transport accessibility in the west of the borough, with only one underground station serving the area west of the central East Coast Main Line.

Haringey has a network of 46 bus routes which are predominantly radial. The nature of the road network and low rail bridges provides some constraint on enhancing orbital travel. Of all the routes available, 35 of them serve the borough at a frequency of every 10 minutes or less during a weekday morning peak time. Of the remaining, nine services run at a frequency of 10 to 15 minutes, and the remaining two services run at a frequency of 15 to 20 minutes. Despite high frequencies, capacity pressures on many routes remains high.

The public transport system suffers from some overcrowding, particularly at peak times on the Victoria and Piccadilly lines from Finsbury Park to Central London and on the Barking Gospel Oak line.

Public transport accounted for 36.95% of all trips in 2017, up from 28.1% in 2000. Recent improvements to the public transport network include upgrades to the Northumberland Park and Tottenham Hale Stations, improvements to frequency and reliability and three tracking of the West Anglia Main Line, and electrification of the Barking Gospel line.

Currently none of the underground stations have step-free access, only two of the rail stations are fully step-free, and two interchanges are partially step-free.

Road Network

Haringey's road network is largely oriented as radial links. The North Circular Road does not lie within the Borough, but forms a key orbital link skirting the north-western boundary and is the most accessible orbital road to the Borough. Three Transport for London Road Network (TLRN) roads route through the Borough, comprising the A1 Archway Road through the south-western corner of the Borough, the A10 Tottenham High Road which runs north-south to the east of the Borough, and the A503 Seven Sisters Road which joins the A10 to the south.

Average car or van ownership and journey to work car use is higher in areas where public transport accessibility is lacking. There is a continued pattern of division largely across the Great Northern Line, with car ownership and use proving to be higher to the more affluent west of the Borough.

The Council has been working to provide alternatives to individual car use. There are now 75 car club bays in operation in the borough and the Council is in the process of completing a multi operators contract for additional bays. There will be a total of 44 new car club bays installed. Haringey is also part of the DriveNow 'floating' car club service. It is a floating model, which means vehicles do not need to be picked up or returned to a specific parking space. It has a fleet of 250 vehicles across the four borough operational areas, including 50 BMW i3 electric vehicles.

The Council has a policy to promote the uptake of electric vehicles through the implementation of off-street charging infrastructure in public car parks and also for on-street parking. The Council installed 38 new charging points in late 2018 across the borough. We now have 54 charging points in the borough.

In addition, parking management and control schemes such as Controlled Parking Zones (CPZs) have helped to reduce the number of non-local cars (commuters and shoppers) in the borough

Walking and Cycling Network

Haringey has a network of cycle routes across the borough including cycle lanes on main roads and separated cycle lanes and will deliver fully signed Quietway routes. The Cycle Superhighway 1, connecting North Tottenham to Liverpool Street, was completed in 2016.

Cycling and walking mode shares remained constant in 2017, at 2% and 25% respectively. As part of the borough cycling programme, Haringey has worked together with the Haringey Cycling Campaign (HCC) and TfL to identify improvements aimed at making the borough roads more permeable and safer for cyclists. Outside of the monitoring period, the Council is also working with TfL to secure extra resource to work on cycle route design.

School Travel Plans and Personal Travel Plans both support parents, pupils and individuals to travel more sustainably, including to cycle. There are now 65 schools with School Travel Plan accreditation - 14 bronze, 10 silver and 40 gold and one Engaged.[58]

Safety

Every year more than 2,000 people are killed or seriously injured on London's streets. In London in 2016, more than 30,000 people were injured in road collisions. People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger.

[58] https://www.haringey.gov.uk/parking-roads-and-travel/travel/smarter-travel/school-journeys

Climate Change

Transport emissions make up 24% of carbon emissions in Haringey, compared with of 36% for the UK as a whole.

Projections

Projected increases in population and housing will put considerable strain on transport and other infrastructure particularly in the growth areas of Tottenham and Wood Green.

TfL is looking to create new cycle routes from Camden to Tottenham Hale; from Farringdon, through Haringey, to Bowes Park; and a Quietway from North Finchley to Hornsey.

The Council is also working on a Walking and Cycling Action Plan which will set out a strategy for improving active travel across the borough. This includes setting out a local walking and cycling network and identifying the infrastructure required to support it.

It is estimated the percentage of the population within 400m of the strategic cycle network will rise from 10% in 2016, to 20% in 2021 and 81% in 2041.

The number of cars owned in London is projected to decrease over the period 2016 to 2021 falling further than the lowest recorded in 2014. It is predicted that there will be 4297 fewer cars owned in the borough by 2021 falling from 64,897 to

60,600. This is predicted to drop a further 2000 to 58,600 by 2041[59].

Funding uncertainty remains for Crossrail 2. However, if delivered, the line will link north east and south-east London, providing faster trains for Haringey's growing population and supporting regeneration work across the borough. Two proposed Crossrail 2 routes could traverse the borough, the first through Tottenham Hale and Northumberland Park, whilst the second is via Seven Sisters, and either Turnpike Lane and Alexandra Palace or Wood Green. Both options will ease crowding on existing services, provide an interchange with the Piccadilly line and bring passengers to Haringey from north of England with the planned High Speed 2 (HS2) station at Euston.

Health and Equalities Impacts

Access to a high quality and sustainable transport system is a matter of social justice and equality. We need to provide safe, accessible, and affordable walking, cycling and public transport options to allow residents who do not own a car or struggle to afford fares to fully engage with society and access opportunities. Similarly, a fair transport system should ensure equal access for those with mobility issues.

Main roads pass through some of the most deprived communities, creating environments that are not inclusive to all, with roads that are intimidating and difficult to cross. People from more deprived areas, some ethnic minorities,

disabled people, children and older people are disproportionately affected by road danger. 80% of all deaths and serious injuries occur to people walking, cycling or riding motorcycles. 73% of collisions resulting in death or serious injury for those on foot, bike or motorbike in London take place at junctions.

The New Local Plan will need to consider the extent to which its policies and strategies:

- improve equality of access by walking, cycling and public transport; and
- improve the safety of the transport network, particularly for those disproportionately affected by road danger.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- Projected increases in population and housing will put considerable strain on transport and other infrastructure, particularly in the growth areas of Tottenham and Wood Green. Without a shift to more sustainable modes of transport this will likely result in increased congestion, greater levels of air pollution and carbon emissions, and more severe parking pressures.
- The borough has excellent public transport links in general; however, accessibility is uneven with provision poorer in the west of the borough. There is also a lack of orbital links in the borough.

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[59] Haringey Council (2019), 'Local Implementation Plan (LIP3) 2019-2022'

- Recent and anticipated investment in cycling infrastructure along with a low existing mode share means that there are significant opportunities to increase the proportion of cycling trips in the borough.
- Speed is a major contributory factor to people being killed or seriously injured in road traffic accidents

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- Enhance and improve connectivity and accessibility for all to, from, within and around Haringey.
- Increase the proportion of journeys made by sustainable and active transport modes.
- Improve the safety of the transport network.

3.11 Noise Pollution

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- Policies should prevent new and existing development from contributing to or being put at unacceptable risk from noise pollution.
- Policies should mitigate and reduce to a minimum potential adverse impacts resulting from noise from new developments – and avoid noise giving rise to significant adverse impacts on health and the quality of life
- Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities. Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.
- Policies should identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Three types of noise are defined in the Noise Policy Statement for England (NPSE) (March 2010). These are:
- environmental noise which includes noise from transportation sources;
- neighbour noise which includes noise from inside and outside people's homes; and
- neighbourhood noise which includes noise arising from within the community such as industrial and entertainment premises, trade and business premises, construction sites and noise in the street.

Regional

The main messages from the London Plan include:

- Policy D14 (Noise) looks to reduce, manage and mitigate noise emissions as part of residential and other non-aviation development proposals in order to improve health and quality of life. Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra's Noise Action Plan for Agglomerations.
- Policy D13 (Agent of Change) sets out the Agent of Change principle which places responsibility for mitigating impacts from existing noise and other nuisance generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.

Local

Key provisions relating to noise impacts in the Local Plan include Policy DM23 (Environmental Protection) which seeks to ensure that new noise-sensitive development is located away from existing or planned sources of noise pollution. Proposals for potentially noisy development must suitably demonstrate that measures will be implemented to mitigate its impact.

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[60] http://extrium.co.uk/noiseviewer.html

Baseline

There is limited information available on noise and vibration generally across the borough. Figure 7. shows estimated levels of road traffic noise, which is the primary noise source in most parts of the borough.

This is based on the strategic noise mapping exercise undertaken by the Government in 2012[60], and shows results are shown for LAeq,16h, which is the annual average noise level (in dB) for the 16-hour period between 0700-2300.

Figure 7 LAeq 16-hour road traffic noise levels in London Borough of Haringey 2012
Source: http://extrium.co.uk/noiseviewer.html

68
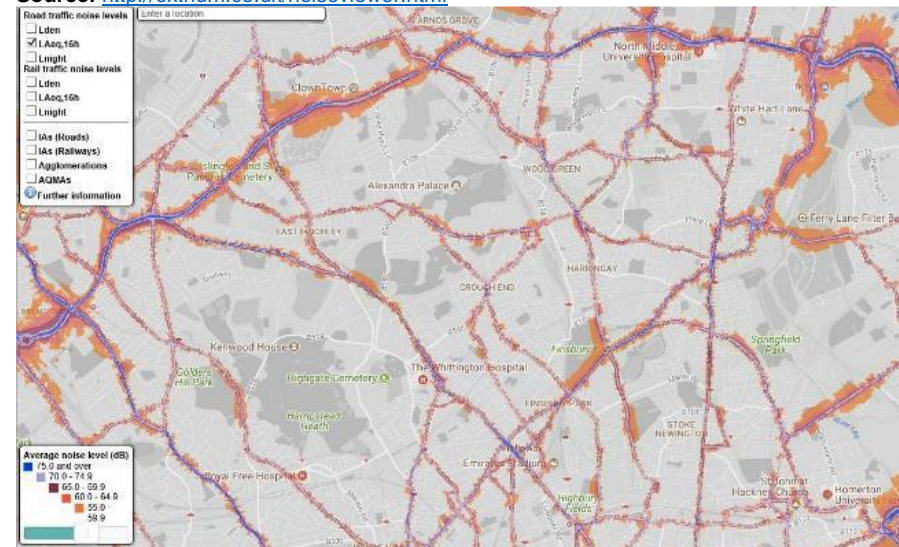
The actual level of noise may have increased due to increases in traffic since 2012, but this is unlikely to be to a significant extent.

The pattern and distribution of noise levels is likely to be relatively unchanged over this time. From Figure 4.4 it may be seen that the main areas affected by traffic noise in Haringey are along the main traffic routes through the Borough. In particular, areas close to the A406 North Circular Road and A1055 Watermead Way are particularly affected by noise, but other main routes such the A10 Tottenham High Road and Great Cambridge Road, A1010 Tottenham High Road, A105 Green Lanes and Wood Green High Road, A1 Archway Road, A504 through Hornsey and Muswell Hill and A503 Seven Sisters Road also all experience higher levels of traffic noise.

Projections

The TfL MTS LIP3 Borough Datapack indicates that the amount of traffic on roads in Haringey may reduce by up to 20% by 2041, due to the Mayor's policies. However, this reduction would not be sufficient to lead to a significant decrease in noise from road traffic.

Health and Equalities Impacts

Noise disturbance is associated with health impacts such as sleep disturbance, stress, anxiety, high blood pressure, poor mental health in adults and school performance and cognitive impairment in
children.

The adverse impacts of that stress are clearly documented, resulting in higher rates of cardiovascular disease and deteriorating mental health.

The New Local Plan will need to consider the extent to which its policies and strategies:

- reduce inequalities in exposure to noise, vibration and disruption.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:
- Road traffic noise is the primary noise source in most parts of the borough.
- The main areas affected by traffic noise in Haringey are along the main traffic routes through the Borough.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to minimise noise and vibration exposure and disruption.

3.12 Waste Management

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- An overall environmental objective to minimise waste and pollution.
- Strategic policies are expected to make sufficient provision for waste management.

Further guidance on waste management is provided in the Waste Management Planning Practice Guidance.

Waste planning authorities play a role in implementing the EU Waste Framework Directive (2008/98/EC) in England. The National waste management plan for England and national planning policy for waste must also considered in the preparation of Local Plans.

The European Commission has put forward a Circular Economy Package[61] which includes a 65% recycling target for municipal waste by 2030. The UK has signed up to delivering these as part of Brexit.

Regional

The main messages from the London Plan include:

- Policy SI 7 Reducing Waste and Supporting the Circular Economy which encourages resource conservation, waste reduction, increases in material re-use and recycling and reductions in waste going to disposal.
- Policy SI 8 Waste capacity and net waste self-sufficiency which requires Development Plans to plan identified waste needs, identify how waste will be reduced in line with Circular Economy principles and allocate suitable sites and areas for waste management facilities.

The London Environment Strategy (2018) sets an ambition for London to be a zero waste city by 2050, with no biodegradable or recyclable waste sent to landfills by 2026 and with 65% of municipal waste being recycled by 2030.

Local

The North London Waste Authority (NLWA) is the statutory waste disposal authority for the seven north London boroughs; Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. A North London Waste Plan is currently being put together by the seven boroughs. This document has two main purposes:

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up

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[61] European Commission Circular Economy Package
http://ec.europa.eu/environment/circulareconomy/

index_en.htm

to 2035 to manage waste generated in North London; and

- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

Local Plan Policy SP6 Waste and Recycling supports the objectives of sustainable waste management and requires Site Waste Management Plans for major applications. In addition, Policy DM4 Provision and Design of Waste Management Facilities, requires all proposals to consider how to sustainably manage waste arising from development and create on-site provision for general waste, the separation of recyclable material and organic materials for composting.

Baseline

Local authority collected waste (previously termed municipal waste) includes all waste collected for recycling, composting, recovery and disposal from households in the North London area by the boroughs in their capacity as waste collection authorities. The amount of waste produced in North London between 2006/07 and 2012/13 fell despite the increase in population and dwelling stock, and it would appear to be related to the economic downturn during this period. 2013/14 saw a return to increasing waste volumes but this has not been

sustained and the waste produced in the north London area has decreased again in 2018/19.

The NLWA Monitoring Data shows that in the year 2018/19, 8.5% of waste arising was sent to landfill, an improvement on the 2015/16 figure of 13%, meeting current targets. North London currently relies on the Energy from Waste facility at Edmonton EcoPark in Enfield as the primary method of disposing of LACW that cannot be recycled or reused (63% of total local authority collected waste sent for energy recovery by incineration, 511,577 tonnes in 2018-19)[62].

Household recycling rates in Haringey have shown improvement in recent years, with a high of 30.2% of household waste recycled or composted in 2018/19, which was up from 21% in 2006/07. This is consistent with the last three monitoring years of 32% in 2015/16, 36.1% in 2016/17 and 33.2% in 2017/18. Notably 100% of residents from the constituent NLWA boroughs continued to receive a door-to-door or communal recycling service. All households and schools in the borough now have access to convenient and comprehensive recycling facilities, with facilities at a number of community centres and on-street recycling points on high streets and around transport hubs. There are two Reuse & Recycling Centres in the borough for residents to bring

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[62] NLWA annual report 2018/10,
https://www.nlwa.gov.uk/ourauthority/our-reports

unwanted items to, and these accept an increasing range of materials and items for reuse or recycling.

Construction and demolition waste comprised 15% of waste arisings in North London in 2016, while excavation waste comprised 26%.The largest proportion of construction and demolition waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of construction and demolition waste are high due to the nature and value of the material. Excavation materials are primarily disposed of directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%). The London Plan includes a target of 95% recycling of construction, demolition and excavation waste.

Projections

The London Environmental Strategy 2018 projects that the capacity of landfills accepting London's waste is expected to run out by 2026.[63]

The proposed submission NLWP states that existing capacity and additional new capacity will be needed to meet North London's identified need for waste management over the plan period (2020-2035). Existing waste capacity in North London is safeguarded and land for new waste facilities is set out in as part of the submission document.

The focus for new waste capacity in North London is for recycling and recovery facilities to manage the predicted quantities of waste, thereby reducing exports to landfills outside of the North London area.

The NLWA's long term waste management solution is based upon the continued use of the existing Edmonton facility until 2025 and the development of a new energy recovery facility on the same site to be operational from 2025 onwards.

In November 2014 the NLW announced plans for the development of a new Energy Recovery Facility (ERF) - the North London Heat and Power Project - on their existing site at the Edmonton EcoPark in Enfield. This will replace the existing Energy from Waste (EfW) plant at the EcoPark that is coming to the end of its operational life.

The replacement facility, expected to be operational from 2025, will generate power for around 127,000 homes and provide heat for local homes and businesses as part of a decentralised energy network known as the Lee Valley Heat Network, trading as energetik[64].

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[63] GLA (2018) London Environment Strategy 2018 [Online] available at https://www.london.gov.uk/what-we-do/environment/london-environment-strategy

[64] http://www.northlondonheatandpower.london/project/

Health and Equalities Impacts

Waste processing and disposal facilities are often located in lower socio-economic areas where, if not properly managed, they can adversely affect nearby communities.

The New Local Plan will need to consider the extent to which its policies and strategies:

- minimise negative impacts of waste management, processing and disposal on vulnerable groups.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- The London Environmental Strategy 2018 projects that the capacity of landfills accepting London's waste is expected to run out by 2026. Haringey will need to reduce waste creation, and increase reuse and recycling in order to avoid waste going for disposal.
- Construction and demolition waste comprised 15% of waste arisings in North London in 2016, while excavation waste comprised 26%.
- The London Plan includes a target of 95% recycling of construction, demolition and excavation waste

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to support the move towards a circular economy.

4. Housing

4.1 Housing

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- support for strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations;
- plans and decisions should apply a presumption in favour of development which means plans should positively seek opportunities to meet development needs of their area and that save for two exceptions the strategic policies within should provide for objectively assessed needs for housing;
- strategic policies in Plans should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing
- strategic policies should be informed by a local housing need assessment to determine the minimum number of homes needed, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals;
- within this context, the size, type and tenure of housing needed for different groups in the community should be

assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes);

- where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership;
- to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay;
- strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability; and
- local planning authorities should identify and annually update a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. They are also subject to a Housing Delivery Test which tracks delivery against the housing requirement over a rolling three-year period.

The Government also sets out planning policy for traveller sites. Key messages include:

- the overarching aim to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community; and
- local planning authorities should make their own assessment of need and develop fair and effective strategies to meet this need through the identification of land for sites.

Regional

The current London Plan adopted in 2016 sets the Council a minimum annual housing target of 1,502 homes from 2015/16 to 2024/25.

The London Plan 2019 is predicted on the delivery of 'Good Growth'. Good Growth objective 4 is to deliver the homes that Londoners need.

The Mayor's London-wide Strategic Housing Market Assessment (SHMA) which underpins the London Plan 2019 identifies need for 66,000 additional homes per year. Table 4.1 of the Plan sets Haringey a minimum ten-year minimum housing target (2019.20 to 2028/29) of 15,920 homes which equates to 1,592 homes per year. Policy H1 sets out that this target must be included within local authority Development Plan Documents. To ensure that targets are achieved, councils are required to base their housing delivery strategies on Local Development Plans and optimise the potential for housing delivery on all suitable and available brownfield sites.

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Policy H2 of the London Plan 2019 requires boroughs to proactively support homes on small sites (under 025 hectares in size). In this regard, Table 4.2 sets Haringey a minimum target for small sites of 2,600 homes over a ten-year period as a component of the overall housing target.

Policy H4 sets a strategic target for 50% of all new homes to be genuinely affordable and Policy H5 sets out a threshold approach to be applied to major development proposals that trigger affordable housing requirements (a minimum of 35% affordable housing or 50% in certain cases). Policy H6 sets out the affordable housing tenure that should be applied to residential development which includes a minimum of 30% low-cost rented homes and a minimum of 30% intermediate products with the remainder to be determined by boroughs.

The London Plan contains further policies on the loss of existing housing, best use of existing stock, housing size mix, build to rent, supported and specialised accommodation, specialist older persons accommodation, gypsy and traveller accommodation, purpose-built student accommodation, and large-scale purpose-built shared living.

The London Housing Strategy 2018 sets out the Mayor's proposals to deliver the step change required in London's housing supply.

Local

The Borough Plan 2019-2023 identifies Housing as Priority 1 with a stated aspiration of "a safe, stable and affordable home for everyone, whatever their circumstances". It includes objectives to start as many new, good-quality homes as possible, to start 1,000 new council homes at council rents by 2022 and to reduce the number of households in temporary accommodation by a quarter to 2,250 by 2022.

Policy SP2 of the Local Plan Strategic Policies DPD sets out that the Council will aim to provide homes to meet Haringey's housing need and to make full use of Haringey's capacity for housing by maximising the supply of additional homes to meet and exceed the minimum target of 19,802 homes from 2011-2026 (820 units per annum from 2011-2014 and 1,502 units per annum). It sets out that, subject to viability, sites capable of delivering 10 units of more will be required to meet a Borough wide affordable housing target of 40%, based on habitable rooms delivering an affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing (this tenure split is reversed in the area covered by the Tottenham Area Action Plan. Policy DM11 of the Development Management DPD sets out that proposals for new residential development, including mixed-use schemes comprising residential accommodation, should provide a mix of housing.

The Housing Strategy 2017-2022 sets out the Council's vision for housing in Haringey from 2017 to 2022. In February 2019, the Council adopted a revised Appendix C to the current Housing Strategy (2017-22). This states that the Council wishes to see as high a proportion as possible of the new affordable homes being delivered as homes for general needs. It also expressed an explicit preference for social rent homes with rents at target rent levels, especially for council-led homes at social rent levels, where possible.

The Council is committed to delivering genuinely affordable housing and is in the process of preparing a new Housing Strategy setting out its approach to delivering the right mix of affordable homes, including reviewing what is meant by 'affordability'. The Strategy will seek to prioritise the delivery of social rented homes and homes at London Affordable Rent consistent with the revised Appendix C of the current Haringey Housing Strategy.

Baseline

Haringey is identified as an Outer London borough in the London Plan but has a mixture of Outer and Inner London characteristics. It comprises large areas of low-density residential, particularly in the west, but also has areas of high-density residential development within the Wood Green and Tottenham areas, with the latter being a focus for taller buildings.

As of 2018 most residents lived in a rented property, with 20% renting from the local authority or a housing association, and 34% renting from a private landlord. The proportion of renters has increased since 2011, while the proportion who own their own home is decreasing. Home ownership is out of reach for many of Haringey's existing residents and the need for affordable housing considerably outstrips the current supply.

Home ownership is greater in the west of the borough, with higher concentrations of social rented housing in the east of the borough, reflecting a significant social and economic polarisation.

When considering home ownership, it is worth reflecting on house prices during the past twenty years. House price trends based on lower quartile prices, whilst higher, have mirrored those in England as a whole. Overall prices increased substantially in the period 2001-2008 (from £150,000 to £282,000 at 2019 values). Values then reduced from the beginning of 2008 and fell to a low of £250,000 in 2010 since which they have grown steadily to £432,000 (Q1 2018) before dipping again to around £400,000 in 2019.

The median monthly private rent in Haringey is £1,425 (12 month rolling period to Q4 18-19), slightly lower than the London median (£1,495). Median weekly local authority rents in Haringey are £104.63 (around £455 a month), which is also in line with the London median (£105.72). Median private rent has increased by 11.5% in the last 4 years, a higher rate than local authority rents (6.5%) but less than private rents in London on average (15%).

Haringey has diverse household composition. 32% of households are one person households. 16% of households are couples with dependent children, and 11% are households with a lone parent with dependent children. 59% of Haringey residents live in a flat, maisonette, or apartment with the remaining 41% living in a whole house or bungalow

Between April 2011 to March 2019 7,129 new homes (net) were delivered in the borough (an annual average of 891 homes). While this is a substantial number, it is a considerable shortfall versus the borough's target over that period of 9,288 new homes.

In the past three years the borough has only delivered an average of 55% of the Local Plan annual housing target as measured by the Government's Housing Delivery Test. As a result, it has been required to publish a Housing Delivery Test Action Plan.

The Council has established a strong track record of securing affordable housing within new developments. Of the 7,129 new homes delivered since 2011, 1,899 of these were affordable equating to 33.5% of total homes (39% by habitable room). On major schemes, 58.3% of total homes delivered were affordable (52.5% by habitable room). However, until recently the majority of affordable housing which has been secured has been shared ownership or 'Affordable Rent'. While these products both fall within the Government's definition of affordable housing, they are not affordable to most Haringey households in housing need.

Over the period 2011 to 2018 the housing mix delivered in the borough has been as follows:

- 5.5% bedsit/studio
- 40.4% one bedroom homes
- 45.6% two bedroom homes
- 12% three bedroom homes
- There has been an overall loss of 4 or more-bedroom housing in the borough, with 206 family homes taken out of Haringey's overall housing stock in the past 8 years.

Over the period 2011-2018 the affordable housing mix delivered in the borough is as follows:

- 33.8% one bedroom homes
- 47.7% two bedroom homes
- 14% three bedroom homes
- 4.5% four or more bedrooms

Around 30 per cent of households in London include a person with a long-standing illness, disability or impairment which causes substantial difficulty with day to day activities. In terms of planning approvals, the London Plan Annual Monitoring Report shows that a very high proportion of new build units in London currently comply with Lifetime Homes standards (93 per cent).

The Council completed a strategic review of Supported Housing in 2017 and assessed the current and required supply of specialist housing in the borough. The review shows that there is a shortfall in the supply of specialist supported housing for the following groups:

- older people with complex needs such as learning disabilities, mental health and substance misuse, and accessible sheltered housing units for those with physical disabilities;
- people with mental health conditions leaving hospital and/or secure units, and specific units for women being discharged from hospital;
- people with learning disabilities who require supported living units;

- single homeless adults requiring move-on accommodation, including those with complex needs;
- vulnerable young people and care leavers with complex offending/gang related needs; young women at risk of exploitation; and smaller services for young people to learn independent living skills; and
- survivors of domestic violence, and particularly provision for women from BAME backgrounds and for women with disabilities.

There are two existing permanent Gypsy and Traveller sites in Haringey, one at Wallman Place, N22 providing 6 pitches and one on Clyde Road, N15 providing four pitches.

The Council is required by legislation to keep a register of individuals and associations of individuals who are seeking to acquire land in Haringey for their own self-build or custom housebuilding project. On 31 October 2019 the Councill introduced two local eligibility criteria: a local connection test and an assessment of financial resources. Currently there is only one individual on part one of the register and none on part 2 of the register.

Projections

Haringey's five year housing land supply annual assessment in the 2018/2019 Authority Monitoring Report indicates that the borough has deliverable sites for 11,694 new homes which equates to a 5.03 year housing land supply.

The borough's current housing target of 1,502 homes per year is set to increase to 1,592 homes per year when the new London Plan is published (an annual increase of 6%). This will have implications for the future housing land supply position and in relation to the Housing Delivery Test.

The Council has already granted planning permissions for several large sites in the Wood Green and Tottenham Hale Key Growth Areas. These will be a major source of housing completions over the next 5 years, however in the longer term it will be challenging to bring forward sufficient land to meet the borough's housing targets.

In the past 2 years, the Council has focused on securing genuinely affordable homes through Section 106 agreements on major schemes. This has been reflected in a significant uplift in the number of low-cost rented homes that have been consented. This trend is likely to continue given the focus on affordability. The Council's own housing delivery programme of starting 1000 social rent council-led homes by 2022 will also make a major contribution to addressing the very large affordable housing need in the borough.

The Government's proposals for First Homes are likely to have a major impact on the type of affordable housing delivered in the borough. The most recent consultation (August 2020) sets out that at least 25% of affordable homes secured should be First Homes.

Health and Equalities Impacts

The Haringey Fairness Commission Report noted secure, good quality housing as a foundation of a decent life and highlighted housing disadvantage as a key factor that contributes to inequalities between different groups of residents in the borough.

The supply of social housing and the cost, security and quality of private rented sector housing were noted as particular issues in Haringey. It was also noted that there are a range of specific housing issues affecting disabled people.

In Haringey, access to housing is a fairness issue because access to decent, affordable and adequate housing is not evenly distributed.

Some of our communities are disproportionately affected by housing issues – young people aged 18-21 are not eligible for the housing element of Universal Credit and those aged 35 or below without a partner or dependent children are only eligible for the shared living rate. This means many potentially at-risk young adults cannot afford to live alone and are also more likely to be in poor quality private rental accommodation with higher rents and insecure tenancies. Overcrowded households in Haringey are most likely to be headed by someone of White Other ethnicity (31%), followed by Black ethnicity (28%), both of which are over-represented relative to the wider population. People of Black ethnicity also make up more than half of all household reference persons in temporary accommodation (53%).

The COVID-19 pandemic has brought many of the borough's housing challenges to the fore including:

• the vulnerability of many residents to being pushed into a housing crisis, with social tenants and private renters particularly exposed (and who make up the majority of the borough's residents); and

• the risks to residents' welfare and wellbeing of living in overcrowded homes or homes which do not have convenient access to high-quality open spaces.

The pandemic has very clearly demonstrated the essential role of housing in supporting public health, both in terms of the size and quality of housing and also its location and access to amenities.

Emerging evidence indicates that COVID-19, social distancing, and associated policy measures have had disproportionate impacts upon already vulnerable and disadvantaged groups.

The New Local Plan will need to consider the extent to which its policies and strategies:

- contribute to increased supply of genuinely affordable homes;
- deliver homes to meet the full range of needs of Haringey's current and future population, including specific group needs such as older people, gypsies and travellers and those in need of supported housing;

- ensure that new homes are of a high quality and a suitable size and support health and well being;
- ensure that new homes are inclusive and accessible; and
- ensure that new homes are served by appropriate infrastructure and located well in relation to key amenities such as public open space and other services and facilities.

Issues, opportunities and objectives

The following key issues emerged from the context and baseline review:
- Since 2011 housing delivery in the borough has fallen short of targets.
- The Council's housing target is set to increase even further once the new London Plan is published which will be a significant challenge to deliver
- There is a high need for housing of all types in Haringey, particularly housing which is genuinely affordable for local residents
- There is a need to drastically increase the supply of social housing in the borough and to address specific housing issues affecting disabled people
- There is a need for a full range of housing types, including specialist needs such as those highlighted in the Council's 2017 Supported Housing Review.
- Housing disadvantage is a key issue affecting the health and wellbeing of residents

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to provide an increased supply of new homes;
- to increase the supply of affordable homes, particularly low-cost social rent homes;
- to deliver a suitable housing mix that meets local need;
- to provide high-quality, inclusive adequately sized homes;
- to deliver a full range of housing types to meet local need, including specialist needs; and
- provide homes in good locations with access to services, facilities and amenities.

5. Economy

5.1 Economy and Employment

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- ensuring sufficient land of the right type is available in the right places and at the right time; and identifying and coordinating development requirements;

- the need to meet demand for office and workspace floorspace over at least a ten-year period; and

- addressing investment barriers such as infrastructure constraints and incorporate flexibility to account for changing circumstances, and enable response too economic changes.

Regional

In London, types of industrial and employment land are categorised in order of importance. Strategic Industrial Locations (SIL) sit at the top of this hierarchy and are London's main reservoir of land for industrial, logistics and related uses.

The main messages from the London Plan include:

- no net loss of capacity on Strategic Industrial Land
- maintaining a sufficient supply of land and premises in different parts of London to meet current and future demands; and

- supporting mixed use development on employment land where appropriate and feasible.

The London Plan notes that that there is a need to tackle persistent poverty and deprivation through a policy framework that helps to tackle unemployment and worklessness. In particular, there is a need to ensure Londoners have the education and skills they need to find work.

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.

Local

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.

The Local Plan supports new or intensified employment floorspace in designated employment areas and resists the loss of floorspace in SIL and LSIS, but does allow for other uses where this is exceptionally justified. On our other designated and non-designated land, a more flexible approach is taken, and mixed use, employment-led development can be allowed where this is necessary to facilitate renewal and regeneration (including intensification) of existing employment land and floorspace.

Baseline

The borough contains 133 hectares of employment land, over 1,000 buildings, 722 business establishments and nearly 736,000m2 of employment floorspace. The borough also contains other smaller employment locations which total a further 16.6 hectares of employment land.

The COVID-19 crisis has had severe economic impacts on the borough and its residents. As of June 2020, 50,400 employees living in Haringey had been furloughed and over 19,000 new residents were claiming unemployment benefits. Haringey's economy has been highly exposed due to high numbers of employees in sectors adversely affected by social distancing (arts and entertainment, accommodation, food, and retail). Analysis by Oxford Consultants for Social Inclusion suggests that up to one third of all jobs are at risk based on furlough data published from the Office of National Statistics. As well as creating urgent issues the pandemic will have far-reaching consequences for Haringey's businesses and economy.

Until the onset of COVID-19 the borough had a relatively strong labour market, with high levels of participation, low levels of unemployment and strong skills levels. More than three-quarters of Haringey's working age population were economically active, with the unemployment rate well below the level experienced across London. However, there were challenges around economic participation in some groups, particularly people from ethnic minority backgrounds.

Haringey workers and residents tend to earn less than average; median hourly pay among Haringey workers is below the statistical neighbour and London rates, while the proportion of residents earning below the London Living Wage is higher. These findings suggest that in-work poverty is likely to be a significant issue for many residents.

The borough had 92,000 jobs in 2017 which was significantly below that of statistical neighbours and London averages and meant it had the fourth lowest jobs density of the 32 London boroughs. Linked to this, and facilitated by strong transport connections, Haringey has a high net-outflow of commuters, particularly into Central London. Employment growth before COVID-19 was relatively slow - Haringey has seen the sixth slowest employment growth of London boroughs over the past five years.

The borough's sector profile has a strong local service offering, reflecting Haringey's role as a suburb within London. The most prominent sectors are public services, retail, arts and entertainment, accommodation and food.

Haringey has traditionally had a strong industrial and manufacturing economy relative to the rest of London, with a high concentration of industrial estates to the East of the borough along the Lee Valley corridor. Industrial estates are the most significant employment location in the borough and accommodate some of the largest companies which generate a significant number of jobs and opportunities. This has provided a range of opportunities for Haringey's residents.

However like many other London boroughs, the amount of industrial floorspace has declined in recent years.

Strong demand for workspace has led to a marked shift in the local workspace market in recent years. Many of Haringey's workspaces have congregated around key employment or industrial locations which have good transport access, with concentrations around Seven Sisters, Tottenham Hale and Wood Green. South Tottenham is one of only six London areas to be designated a Creative Enterprise Zone (CEZ) reflecting the fact it has a particularly strong cluster of fashion, textiles, art, music and small-scale manufacturing.

Evidence suggests ongoing pressing demand for training in English for speakers of other languages (ESOL), literacy, numeracy and ICT, to address skills barriers to work.

Projections

In the current environment, predictions are difficult. Taking a long term view, key challenges will include 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. It is likely that the existing high prevalence of new start-up businesses will continue to grow and employment growth will come primarily from leisure, the creative sector, and new office provision for SME's.

Health and Equalities Impacts

Economic inclusion is an important issue, recognising that labour market disadvantage is felt acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, single parents and women and is particularly low for those with mental illness or learning disabilities. Only 12% of residents with a long-term health problem or disability that significantly limits their day-to-day activities are in employment[65].

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

The New Local Plan will need to consider the extent to which its policies and strategies:

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[65] Haringey Council 2019 'Borough Plan 2019-2023 Equality Impact Assessment':
http://www.minutes.haringey.gov.uk/documents/s107023/_Borough%20 Plan%20EQIA_FINAL.pdf

- provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration;
- improve equality of access to jobs and training opportunities; and
- enable disadvantaged people to obtain employment or upgrade their skills and workplace experience.

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- There is a need to secure sustainable economic growth and business development, through increasing and diversifying employment opportunities; meeting the needs of different sectors of the economy and facilitating new land for business development.
- There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses.
- Particular support for start-ups and SMEs is important. This includes ensuring that this type of floorspace (especially affordable workspace) is delivered.
- Ongoing training and development opportunities for all are vital.
- There is a risk that there could be a loss of employment floorspace to new mixed-use development.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- to support a strong, diverse and resilient economy;
- to ensure an adequate supply of employment land suitable for existing and new businesses;
- to support social enterprises, small businesses and the voluntary and community sectors; and
- to enable the delivery of affordable business premises.

5.2 Town Centres

Context

National

The main messages from the National Planning Policy Framework (NPPF) include:

- London's town centres should encourage "strong, resilient, accessible and inclusive hubs with a diverse range of uses that meet the needs of Londoners" including civic, community and social uses.
- The requirement to define a network and hierarchy of town centres and promote their long-term vitality and viability, with the emphasis on a town centre first approach for new retail development
- The need to define the extent of town centres and primary shopping areas, and make clear the range of uses permitted in such locations
- The need to support competitive town centres and oppose schemes that will impact town centre viability.
- To provide a diverse retail offer and to reflect local 'individuality'.

- To allocate a range of suitable sites in town centres to meet the scale and type of development likely to be needed

Regional

The main messages from the London Plan include:

- The scale of new retail, commercial, culture and leisure developments within town centres should reflect the size, role and function of that centre.
- Encouraging strong, resilient, accessible and inclusive hubs with a diverse range of uses
- Identifying locations for mixed-use or housing-led intensification to optimise residential growth potential
- Promotion of vibrant daytime, evening and night-time activities to enhance town centre vitality and viability

Local

Haringey's Local Plan identifies a hierarchy of town centres within the borough. Given the diversity of roles and functions served by Haringey's centres, they have been categorised as follows:

- Metropolitan Centre: town centres with a focus on higher order comparison goods retailing, with higher density employment opportunities, leisure and residential developments. Wood Green is the only metropolitan centre within Haringey.
- District Centre: town centres with a focus on a viable range of functions, particularly convenience, leisure, local employment and workspace. There are five District

Centres in Haringey, and one which partly lies within Haringey (Finsbury Park).
- Local Shopping Centres: these provide for the day-to-day needs of people living and working nearby. There are 38 of these centres in Haringey.

The current Local Plan helps ensure there is sufficient core retailing space and that centres remain viable and vibrant by designating shopping frontages and controlling changes of use within these. Primary retail frontage is typically designated in the heart of a centre where there is a key cluster of A1 uses, and secondary frontages are on the edges of centres where there is more a mix of retail, and cafe, restaurant and other uses. Existing Local Plan policies resist loss of retail floorspace in primary shopping frontages to no more than 35% in non-retail (A1) use and allows for some more flexibility within secondary frontages and local centres to allow for up to 50% in non-retail use.

Baseline

With regards to primary retail frontages, with the exception of Wood Green, most centres are at or just above the threshold for non-retail uses, reflecting the changing nature of town centres.

Vacancy rates prior to March 2020 where generally lower than the national average of 10%.

Rising rental values which have increased 74% over the past three years. Particularly strong growth has taken place in

Bruce Grove/Tottenham High Road, Wood Green and Muswell Hill.

Wood Green is identified as a Metropolitan Centre with a floorspace of 106,000 sq. metres and is the biggest centre in the borough.

Existing convenience goods retail sales floorspace within the borough of Haringey is 54,926 sq.m net.

Comparison goods retail sales floorspace within the borough is estimated as 101,403 sq.m net.

Around a fifth of all crime in Haringey takes place in its town centres. This largely consists of anti-social behaviour, shoplifting and theft. Town centres with the highest number of crimes committed are Finsbury Park and Wood Green.

There is 'high' potential for commercial growth in the future particularly opportunities at Tottenham Hale, an area subject to significant redevelopment.

There is however a perception that some town centres in the borough are not fully accessible, and that the public realm and safety need to be improved.

The diversity of town centre users is high, and is reflected in the ethnicity of users, with 52% being white, 16% being mixed or multiple ethnic groups, 13% are of black, African, Caribbean or black British background, 11% are Asian or Asian British and 8% identify with some other ethnicity.

Based on Haringey's current unemployment rate, a higher proportion of unemployed residents use the town centre compared to those in employment. Only 62% of those surveyed are in employment, compared to 74% amongst Haringey's residents (Annual Population Survey, ONS, 2018).

The household income of those using the town centre was typically between £20,000 and £30,000.

Figure 8 Summary Table of High Street Performance

Summary Table of High Street Performance

High Street	Comparison Floorspace (sqm)	Convenience Floorspace (sqm)	Service Floorspace (sqm)	Vacant Floorspace (sqm)	Number of Employees (Estimated)	Number of Employees (Estimated)	Annual Comparison Goods Turnover (£m)
Wood Green	58,005	15,940	3,450	1,890	4,100	8,300	270,206,708
Green Lanes	10,840	9,300	3,180	860	500	3,400	13,612,668
Muswell Hill	9,100	5,050	3,930	3,020	500	2,700	59,955,765
Tottenham Hale	16,110	1,690	110	1,260	700	4,000	98,320,504
Crouch End	7,600	4,670	3,710	1,330	1,200	3,600	24,491,455
West Green Road / Seven Sisters	2,470	9,120	1,790	970	100	1,400	12,112,560
Bruce Grove / Tottenham High Road	4,750	3,100	1,160	1,190	200	2,000	32,212,398

Source: London Town Centre Health Check, Greater London Authority, 2017

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Projections

What people want from town centres is changing from a demand for retail to more of an experience including leisure, entertainment and eating and drinking, as well as community functions. Recent changes to permitted development and the use classes order will allow for a significant amount of change of use between retail, food and drink, office, financial and certain leisure and community uses without the need for planning permission. It is therefore likely that the change in

town centres away from being primarily retail destinations will accelerate.

It is possible that as a result there may be a consolidation of retail activity, with growth tending to concentrate into larger centres where a critical mass can be maintained, leading to changes in function in some small and medium sized town centres.

Further changes to permitted development allow for the demolition of vacant office buildings to be replaced by residential may exacerbate losses in town centre workspaces to residential, resulting in jobs being pushed out of town centres. It is also likely that residential development above shops and workspaces within town centres will continue and become more prevalent through mixed use redevelopment.

Health and Equalities Impacts

Improving town centres can lead to better chances for people to gain local employment, and given the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities, improved access to jobs can be positive.

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

access to jobs and services through redevelopment and a positive strategy for development in town centres can be beneficial for these groups in particular.

Town centres should be spaces for everyone in the community. Town centres have traditionally been retail based and can exclude groups on low or no income, such as children and young people. Having an inclusive town centre, means being easily accessible to people of all levels of mobility. Having places for people to sit and relax, and for children to play is important for people's physical and mental wellbeing and means that town centres are not just spaces reserved for those who have money to spend.

Recent surveys suggest that improved safety was the thing Haringey residents and workers felt would make the biggest different in encouraging them to visit their town centre more often.

The current Local Plan contains policies to avoid clustering of hot food takeaways and betting shops to address health concerns over obesity and gambling. It also encourages new development to support more active travel like walking and cycling. The New Local Plan will need to consider if more needs to be done to address health issues, including encouraging more people to walk or cycle to their town centres.

The New Local Plan will need to consider the extent to which its policies and strategies:

- Create inclusive, safe and accessible spaces for everyone in the community

- Create healthy environments by promoting active travel and avoiding the proliferation and clustering of uses which are a risk to public health

Issues, Opportunities and Objectives

The following key issues emerged from the context and baseline review:

- Town centres are going to change significantly over the coming years, with control over the proportion of different types of uses within town centres severely curtailed
- There is a need to continue to support job opportunities within town centres, and to bolster their community value to enable job creation and services that are accessible to all, particularly in more deprived areas
- There is a need to enhance the environmental quality of town centres (including quality of buildings and public realm), ensure they are easily accessible and meet local needs.

In light of the key issues discussed above it is proposed that the IIA should include the following objectives:

- Enhance the vitality and vibrancy of the borough's town and local centres
- Enhance the environment of the borough's town and local centres
- Support new retail and leisure development within existing centres

6. Next steps

6.1 Subsequent steps for the IIA process

Scoping is the first stage in a five-stage IIA process:

1) **Stage A (Scoping):** Setting the context and objectives, establishing the baseline and deciding on the scope and framework
2) **Stage B:** Developing and refining options and assessing effects. This includes a full IIA of the likely significant effects of the Local Plan options and policies against the IIA framework. Measures will be identified that could be implemented to avoid or reduce adverse effects. Emerging policies may be refined or amended in response.
3) **Stage C:** Preparing the IIA Report which summarises the assessment in terms of what was done and how it was undertaken. The purpose of the IIA report is to provide sufficient environmental, economic and social information to facilitate fully informed decision-making regarding whether proposed policies should be adopted.
4) **Examination:** The IIA will form part of the supporting examination documents alongside the Proposed Submission Local Plan. If, following consultation further changes are required that have not been subject to an IIA then the IIA may need to be updated. A final IIA Report will accompany the publication of the New Local Plan.

5) **Monitoring:** Once formally published, an IIA Post-Adoption Statement will be prepared that 'tells the story' of how the IIA was developed and how it addresses the monitoring requirements associated with the IIA process.

6.2   Consultation on the scoping report

Public involvement through consultation is a key element of the IIA process. At this scoping stage, the SEA Regulations require consultation with statutory consultation bodies but not full consultation with the public.

The statutory consultation bodies are the Environment Agency, Historic England and Natural England, however, the Council has elected to extend consultation on the draft Scoping Report to the wider public as part of consultation on the Local Plan 'First Steps' document.

All comments received on the Scoping Report will be reviewed and will influence the scope and development of the IIA as appropriate.

6.3   Assessing the New Local Plan

The IIA will identify, describe and evaluate the likely significant effects of implementing the New Local Plan against the IIA objectives. This will be undertaken for the area within the London Borough of Haringey boundary, and if considered necessary, certain places beyond the borough boundary that could be affected by the proposals in the Local Plan.

Any likely effects identified as a result of implementing the Local Plan will be described according to criteria presented within the SA guidance and SEA Regulations including a description of the probability, duration, frequency and reversibility of impacts. As the new Local Plan covers a period up to 2036, the temporal scope of the IIA is proposed as follows:

- Short-term effects – those effects that occur within the first five years of implementation of the New Local Plan.
- Medium-term effects – those effects that occur between six and ten years following the adopted of the New Local Plan.
- Long-term effects – those effects that will occur beyond ten years.

The IIA framework outlined above will be used to assess the likely significant effects of the Local Plan. Within each policy assessment, a description of the potential impacts will be included, and the significance of the effect determined, taking into account the magnitude of the impact and sensitivity of the feature or receptor concerned. Where a significant effect is predicted, measures to mitigate the effects will be identified, so that the potentially significant effects can be avoided or the magnitude of the impact reduced to a level where there would no longer be significant effects.

In order to correctly code the policy effects, the following table will be used. The following significance criteria have been developed to assess the effects of the plan policies. Significant effects are those as defined in the SEA Directive, as illustrated below.

Where there is an effect that could have a positive or negative effect, but the magnitude is uncertain, a combination of symbols will be used (e.g. - / ? signifies a potential minor adverse effect with a significant level of uncertainty associated with the predicted effect).

Significance of effect		Description of effect
++	Significant positive	Likely to benefit a large area of Haringey and wider area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within Haringey or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
O	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor negative	Minor negative effects are likely to be limited to small areas within Haringey, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is affected is likely to be minor, as is the magnitude of the predicted effect
--	Significant negative	Likely to affect the whole, or large areas of Haringey and the wider area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.
?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
N/A	Not applicable	This is applied to objectives that are clearly not affected by the option or policy being assessed.

Appendix A- The IIA Framework

Topic	IIA Objective	Equalities Considerations
People		
Demographics	N/A	Address the diverse needs of Haringey's current and future population Ensure equal access to environmental, social and physical infrastructure
Social Integration and Inclusion	Provision of social infrastructure in appropriate, accessible locations Support strategic improvements to areas with highest deprivation Reduce crime and improve perceptions of safety	Promote social interaction in a way that fosters a culture of equality, fairness and respect Improve safety and address fear of crime to help remove barriers to activities leading to reduced social isolation, particularly in areas of higher deprivation
Health	Contribute to the physical and mental health and wellbeing of residents Address the social determinants of health including housing, environment, and economic Improve quality of, and access to, health facilities	Promote improvements in physical and mental health, particularly in areas of health and social deprivation Reduce differentials in life expectancy and healthy life expectancy across the borough

		Support the provision of quality, affordable and healthy food	Improve access to health and social care services and facilities, particularly in areas of deficiency such as the centre and east of the borough
	Education	Improve quality of, and access to, education and training facilities	Improve inclusivity and accessibility of education and training facilities, particularly in areas where the need is greatest

Place

Air Quality	Reduce emissions and concentrations of harmful atmospheric pollutants Deliver development that does not expose current and future residents to poor air quality	Reduce inequal access to clean air
Climate Change Mitigation	Support reductions in greenhouse emissions to meet national, regional and local net zero carbon targets. Support renewable and low carbon energy generation	Contributes to the provision of smart and affordable energy systems Reduce impacts of fuel poverty, particularly for vulnerable groups
Climate Change Adaptation	Adapt to current and future flood risk. Minimise the potential for overheating	Ameliorate the impact of flooding and overheating, particularly those most vulnerable to its effects

Water Resources and Water Quality	Minimise pressure on water resources, water consumption and wastewater flows Maintain and enhance water quality consistent with the aims of the Water Framework Directive and Thames River Basin Management Plan.	Improve access to our waterways
Biodiversity and Open Spaces	Achieve biodiversity net gain Secure an increase in open space and play space across the borough Reduce deficiencies in open space and play space Protect open space and biodiversity	Improve access to open space and areas of biodiversity interest Reduce deficiencies in open space and play space
Land and Soils	Promote the efficient and sustainable use of land and natural resources	Enable remediation of land to ensure the safety and protection of the most vulnerable
Townscape and Landscape	Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes	Help build a sense to place to promote social integration
Design	Support excellent design that is accessible and inclusive	Help build a sense to place to promote social integration Improve legibility and ease of use of the built environment for disabled people

Heritage & Culture	Protect, conserve and enhance designated and non-designated heritage assets, and contribute to the maintenance and enhancement of historic character	Improves equality of access and engagement with our heritage assets and cultural activities
Transport	Enhance and improve connectivity and accessibility for all to, from, within and around Haringey Increase the proportion of journeys made by sustainable and active transport modes. Improve the safety of the transport network	Improve equality of access by walking cycling and public transport Improves the safety of the transport network, particularly for those disproportionately affected by road danger
Noise	Minimise noise and vibration exposure and disruption	Reduce inequalities in exposure to noise, vibration and disruption
Waste Management	Support move towards a circular economy	Minimise negative impacts of waste management, processing and disposal on vulnerable groups
Housing		
Housing	An increased supply of new homes An increased supply of affordable homes, particularly low-cost rented homes Delivery of a suitable housing mix to meets local need High-quality, inclusive adequately sized homes A full range of housing types to meet local need, including specialist needs	Contribute to increased supply of genuinely affordable homes Deliver homes to meet the full range of needs of Haringey's current and future population, including specific group needs such as older people, gypsies and travellers and those in need of supported housing Ensure that new homes are of a high quality and a suitable size and support health and well being Ensure that new homes are inclusive and accessible

	Homes in good locations with access to services, facilities and amenities	Ensure that new homes are served by appropriate infrastructure and located well in relation to key amenities such as public open space and other services and facilities
Economy		
Economy and Employment	Support a strong, diverse and resilient economy Ensure an adequate supply of employment land suitable for existing and new businesses Support for social enterprises, small businesses and the voluntary and community sectors Enable the delivery of affordable business premises	Provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration Improve equality of access to jobs and training opportunities Enable disadvantaged people to obtain employment or upgrade their skills and workplace experience
Town Centres	Enhance the vitality and vibrancy of the borough's town and local centres Enhance the environment of the borough's town and local centres Support new retail and leisure development within existing centres	Create inclusive, safe and accessible spaces for everyone in the community Create healthy environments by promoting active travel and avoiding the proliferation and clustering of uses which are a risk to public health

Appendix B- policies, plans, programmes, sustainability objectives and strategies

General - International
UN Framework Convention on Climate Change (1992) and Kyoto Protocol (1997) and Paris Agreement (2015)
UN Convention on the Rights of the Child 1990
Johannesburg Declaration on Sustainable Development (Earth Summit 2002)
United Nations Sustainable Development Goals (adopted by the General Assembly in 2017)
The SEA Directive (Directive 2001/42/EC)
General - National
Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
National Planning Policy Framework 2019
Planning policy for traveller sites 2015
National Planning Practice Guidance (various)
Localism Act 2011
Sustainable Communities Act (as amended 2010)
Human Rights Act 1988
General - Regional
London Plan 2016
Intend to Publish London Plan 2019
General - Local
Borough Plan 2019-2023
Haringey Fairness Commission Report (2020)
General – Local Planning Policy
Local Plan: Strategic Policies DPD (2017)
Development Management DPD (2017)
Site Allocations DPD (2017)
Tottenham AAP (2017)
Highgate Neighbourhood Plan (2017)
Planning Obligations SPD (2018)

Wood Green Area Action Plan Preferred Option (2018)
People
Demographics
Equality Act 2010
Growth and Infrastructure Act 2013
London Infrastructure Plan 2050 (2014)
Mayor's Social Infrastructure SPG (May 2015)
Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013)
Social Integration and Inclusion
Crime and Disorder Act, 1998
Police and Justice Act, 2006
Equality Act 2010
Mayor's Social Integration Strategy (March 2018: GLA)
Mayor's Equality, Diversity and Inclusion Strategy (May 2018: GLA)
Accessible London: Achieving an Inclusive Environment SPG (October 2014)
Planning for Equality and Diversity in London SPG (October 2007)
Mayor's Police and Crime Plan 2017-2021
Haringey Accessibility Strategy 2017-2020
Haringey Community Strategy 2015
Welcome Strategy – Haringey: A Welcoming Borough for All
Haringey Fairness Commission Report (2020)
Haringey Young People at Risk Strategy 2019-2023
Haringey Violence against Women and Girls Strategy 2016-2026
Haringey Community Safety Action Plan 2019-2023
Health
Tackling obesity: government strategy
London Health Inequalities Strategy (2018)
London Food Strategy (2018)
Mayor's Play and Informal Recreation SPG (September 2012)
Joint Commissioning Strategy for SEND
Haringey's Health and Wellbeing Strategy 2015-18
Physical Activity and Sports Strategy 2019-2023
Haringey Health and Wellbeing Strategy 2020-2024

Education
Skills for Londoners Strategy 2018
Haringey Accessibility Strategy 2017-2020
Haringey Young People at Risk Strategy 2019-2023
Place
Air Quality
Air Quality Standards Regulations 2010
Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)
Air Quality (England) Regulations 2010
Clean Air Strategy 2019
Environment Bill
London Environment Strategy 2018
Haringey Draft Air Quality Action Plan 2019-2024
Haringey Sustainable Design and Construction SPD (2013)
Climate Change Mitigation
EU Energy Efficiency Directive 2012/27/EU
EU Energy Performance of Buildings Directive 2002/91/EC
Climate Change Act 2008
Planning and Energy Act 2008
Environment Act 1995
Clean Growth Strategy (2017)
Renewable Energy Directive (2018/2001/EU)
Energy Governance Regulation 2018
Revised Energy Performance of Buildings Directive (2018)
London Environment Strategy 2018
Mayor's 1.5C Compatible Climate Action Plan
Mayor's Fuel Poverty Action Plan (2018)
Mayor's Circular Economy Statement Guidance (SPG) - pre-consultation draft (April 2020)
Mayor's Whole Life-Cycle Carbon Assessments (SPG) - pre-consultation draft (April 2020)
Mayor's 'Be Seen' Energy Monitoring Guidance (SPG)- pre-consultation draft (April 2020)
Mayor's Energy Planning Guidance (SPG) (updated April 2020)
The control of dust and emissions during construction and demolition (SPG) (July 2014)
Haringey Draft Climate Change Action Plan 2020

Sustainable Design and Construction (2013)
Climate Change Adaptation
Climate Change Act 2008
The Flood and Water Management Act (2010)
'How Local Authorities can Reduce Emissions and Manage Climate Change Risk' (The Committee on Climate Change) (2012)
London Environment Strategy (2018)
EU Assessment and management of flood risks Directive 2007/60/EC
Thames River Basin Management Plan (2015)
Mayors Regional Flood Risk Appraisal (2018)
London resilience partnership strategic flood response framework, 2015
Haringey Surface Water Management Plan (2011) (SWMP)
Local SuDS Standards (Dec 2015)
SuDS Design Requirements for LLFA Technical Assessment (May 2016)
Sustainable Drainage Design & Evaluation Guide (March 2018)
Water Resources and Water Quality
EU Water Framework Directive 2008/98/EC
Water Act 2003
Thames River Basin Management Plan (2015)
Thames Water - Water Resource Management Plan 2020-2100
London Environment Strategy (2018)
Park Plan (2000) (Lee Valley Regional Park Authority)
Biodiversity and Open Spaces
EU Conservation of Wild Birds Directive 2009/147/EC
Eu Conservation of Natural Habitats and of Wild Flora and Fauna Directive 92/43/EEC and 97/62/EC
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011-indicators updated 2019)
Conservation of Habitats and Species Regulations, 2017
Wildlife and countryside Act, 1981
Natural environment and rural communities Act, 2006
England biodiversity strategy: climate change adaptation principles
The guidance for local authorities on implementing the biodiversity duty, 2007
UK post-2010 biodiversity framework
A Green Future: Our 25 Year Plan to Improve the Environment (2018)
Natural England (2014) Green Infrastructure Guidance

All London Green Grid Supplementary Planning Guidance (2012) (ALGG)
London Environment Strategy (2018)
Thames River Basin Management Plan (2015)
Land and Soil
Safeguarding our Soils' strategy (2009)
Haringey Contaminated Land Strategy
Townscape and Landscape
Countryside and rights of way Act, 2000
25 Year Environment Plan (2018)
Haringey Urban Character Study (2015)
London View Management Framework SPG (March 2012)
Design
Public London Charter (2020)
Streetscape Guidance (2019) (TFL)
Making London Child Friendly (Good Growth by Design) (2020)(GLA)
Mayor's Character and Context SPG (June 2014)
Haringey Urban Character Study (2015)
Tottenham Physical Development Framework (2014)
Heritage and Culture
Planning (Listed Buildings and Conservation Areas) Act 1990
Ancient Monuments and Archaeological Areas Act 1979
UNESCO guidelines on World Heritage Sites
World Cities Culture Report 2015 – measures and cultural assets
Planning (Listed Buildings and Conservation Areas) Act 1990
Ancient Monuments and Archaeological Areas Act 1979
Historic Buildings and Ancient Monuments Act 1953
NPPF Guidance: Historic Environment (2019)
Good Practice Advice Note; The Historic Environment in Local Plans (GPA1) (Historic England) (2015)
GPA2 - Managing Significance in Decision-Taking in the Historic Environment (Historic England)
GPA3 - Setting and Views (Historic England)
The Historic Environment and Site Allocations in Local Plans (Historic England Adivce Note)
Sustainability Appraisal and Strategic Environmental Assessment (Historic England Advice Note)

Mayors Culture Strategy (2018)
Character and Context SPG (2014)
Culture and Night-time Economy SPG (2017)
London View Management SPG (2012)
Haringey Urban Character Study (2015)
Transport
Mayor's Transport Strategy (2018)
Healthy Streets for London (2017)
Walking Action Plan (2018)(TFL)
Cycling Action Plan (2018)(TFL)
Streetscape Guidance (2019) (TFL)
Land for Industry and Transport SPG (September 2012)
Haringey's Transport Strategy (2018)
Haringey Local Implementation Plan 2019-2022
Noise Pollution
Noise Policy Statement for England (NPSE) (March 2010)
EU Noise Directive 2000/14/EC
EU Assessment and Management of Environmental Noise Directive 2002/49/EC
Mayor's ambient noise strategy, 2004
Waste Management
EU waste framework directive 2008/98/EC
Waste (England and Wales) regulations, 2014
National planning policy for waste, 2014
UK waste strategy for England, 2007
Part IIA of the Environmental Protection Act 1990
Mayor's Municipal Waste Strategy, London's Wasted Resource (November 2011)
London Environment Strategy (2018)
Circular Economy Statement Guidance - pre-consultation draft (April 2020)
London Infrastructure Plan 2050 (2014)
Draft North London Waste Plan (2019)
Haringey Sustainable Design and Construction SPD (2013)
Housing

Housing and Planning Act 2016
London Housing Strategy 2018
Mayor's Affordable Housing & Viability SPG (August 2017)
Mayor's Housing SPG (March 2016)
Haringey Homelessness Strategy 2018
Haringey Housing Strategy 2017-2022
Haringey Allocations Policy 2015 revised 2018
Haringey Estate Renewal, Rehousing and Payments Policy 2017
Haringey House Extension in South Tottenham SPD 2013
Economy
Economy and Employment
Mayor's Economic Development Strategy (2018)
Mayor' Skills for Londoners Strategy (2018)
A Tourism Vision for London (2017)
Smarter London Together (2018)
London Infrastructure Plan 2050 (2014)
Land for Industry and Transport SPG (September 2012)
Haringey Regeneration Strategy
Tottenham Strategic Regeneration Framework (2014)
Haringey Economic Development and Growth Strategy 2015
Haringey Economic Development Strategy Consultation Draft 2020
Haringey Good Economy Recovery Plan 2020
Town Centres
Mayor's Town Centres SPG (July 2014)
Tottenham High Road Strategy 2019-2029
Haringey Economic Development and Growth Strategy (2017)
Finsbury Park Town Centre (2014)