

<p><b>Schedule of Alterations to the Strategic Policies DPD</b></p> <p><b>Regulation 21(1)(c) Consultation Statement</b></p> <p><b>October 2015</b></p>	
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**1. Introduction**

- 1.1 Haringey’s Strategic Policies DPD was adopted by the Council in March 2013. The purpose of the Strategic Policies DPD is to set out the long-term vision for how the Borough, and the places within it, should be developed by 2026, and to set out the Council’s strategy for achieving that vision. In particular, it identifies the broad locations for delivering housing and other strategic development needs such as employment, retail, leisure, community facilities and other uses. It also sets the context for the other development plan documents that make up the Haringey Local Plan.
- 1.2 Since the Strategic Policies were adopted there have been a number of changes in the overarching policy framework, including at the national and regional level, which affect planning locally. These changes include:
- The 2011 Census, which set out higher than previously projected population growth figures London, prompting the Mayor of London to prepared the Draft Further Alterations to the London Plan (FALP) that significantly increased Haringey’s strategic housing target from 820 homes per annum to 1,502 homes per annum – an 83% increase;
  - Changes to permitted development rights, which give greater scope for the permitted change of use of offices and shops to go to residential development, as well as provision for larger residential extensions;
  - Changes to the National Planning Practice Guidance (NPPG), most recently to clarify that development contributions for affordable housing should not be sought from developments of 10-units or less, putting it at odds with Haringey’s Local Plan Strategic Policy SP2(7), which requires residential schemes for 1-9 units to provide 20% affordable housing;

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- The introduction of both a Mayoral and Haringey Community Infrastructure Levy (CIL), which changed the way in which new development contributed financially or in kind towards the provision of strategic and local infrastructure required to support sustainable communities;
- The preparation of further key local evidence base studies, including an Open Spaces study, an Urban Characterisation Study, and a Strategic Housing Market Assessment, as well as updates to existing studies on Employment Land, Development Viability and the pan-London wide Strategic Housing Land Availability. These new and updated studies reflect the current state of the environment with respect to the local economy and demands for various land uses, which has changed significantly since the recession when the bulk of studies to inform the Strategic Policies were undertaken; and
- The new Housing Zone designation to be applied to Tottenham, which will see significant public and private investment committed to the area to unlock its development potential and accelerate housing delivery, prompting the Council to prepare a comprehensive regeneration framework for the area along with a dedicated Area Action Plan.

1.3 In light of these changes, the Council has identified a number of alterations, vast majority of which are factual updates, which need to be made to the Strategic Policies to bring it up to date and ensure it remains consistent with the current national and regional planning position. Given that the policies of the Strategic Policies were only recently adopted, having been found sound and consistent with the National Planning Policy Framework and the London Plan, the Council considered that a partial review of its Strategic Policies is appropriate.

1.4 Consultation on the Schedule of Proposed Alterations to the Haringey Strategic Policies DPD took place between 9 February and 27 March 2015. The consultation was undertaken in accordance with the then adopted Council Statement of Community Involvement (2011) (which has subsequently been updated) and in line with the Planning and Compulsory Purchase Act 2004 (as amended) and the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations require the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken in the course of proposing to alter the local plan document, a summary of the main issues raised to consultation, and to detail how the Council took account of the comments received in preparing the final Schedule of Alterations – the pre-submission version.

## 2. Summary of consultation undertaken

2.1 Following Haringey Council's Cabinet endorsement of the Schedule Proposed of Alternations to the Strategic Policies, at their meeting of 20 January 2015 (see <http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=6976> ) the Schedule, and the 'preferred option' drafts of three other local plan documents, was published for public consultation from 9 February to 27 March 2015. Representations were also invited on the Sustainability Appraisal during this period.

2.2 A formal notice setting out the proposals matters and representations procedure was placed in the local newspaper on the 12 February 2015 (see **Appendix A**). In addition, on 9 February a total of over 1,200 letters (see **Appendix B**) were sent by post or email to all contacts registered on the Local Plan consultation database (see **Appendix C**), including all appropriate general consultation bodies. Enclosed with the letter was the

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Statement of the Representations Procedure (see **Appendix D**). Those emailed were also provided with the web link to the documents on the Council's consultation web pages. All specific consultation bodies were sent a letter by post (see **Appendix E**) on 9 February. Enclosed with the letter was a hard copy of the Schedule of Proposed Alterations, the Statement of the Representations Procedure, and a copy of the Sustainability Appraisal Report.

2.3 Reference and 'for short term loan' copies of the Schedule of Proposed Alterations were made available at the Haringey Civic Centre, the Planning Reception at River Park House, and all libraries across the Borough, alongside hard copies of the Sustainability Appraisal Report and the Statement of the Representations Procedure. The documents were also made available to view and download from the Planning Policy web pages of the Council's website.

2.4 In addition to the above, and in an effort to engage the wider public in the consideration of the Proposed Alterations to the Strategic Policies, and the draft local plan documents, articles were placed in the February editions of the Haringey People Magazine (which is delivered to all households in the Borough) and the Tottenham News. The following series of drop in sessions and public meetings were also held:

- Turner Avenue Steering Group (22 Jan)
- Park Grove and Dunsford Road Steering Group (29 Jan)
- St Ann's & Haringey Area Forum Meeting (3 Feb)
- Northumberland Park Area Forum (5 Feb)
- Tunnel Gardens / Blake Estate Residents Meeting (5 Feb)
- Highgate & Muswell Hill Area Forum (5 Feb)
- Tamar Residents Meeting (12 Feb)
- Reynardson Residents Meeting (12 Feb)
- River Park House drop in session (16 Feb)
- Tangmere Steering Group (18 Feb)
- Broad Water Farm RA (18 Feb)
- Turner Avenue Drop in Session (Sat 21 Feb)
- High Road West / Love Lane RA (25 Feb)
- Wood Green Library drop in session (25 Feb)
- River Park House Member drop in session (4 Mar)
- Hillcrest RA (9 Mar)
- West Green & Bruce Grove Area Forum (9 Mar)
- Muswell Hill Library Drop in Session (10 Mar)

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- Stellar House, Altair Close, The Lindales and Bennetts Close Residents and Community Association (10 Mar)
- 163 Park Lane Drop in Session (11 Mar)
- Northumberland Park and Park Lane Residents and Community Association (12 Mar)
- All Ward Member drop in session (18 Mar)
- Headcom & Tenterden Residents Association (24 Mar)
- Summersby Road RA (26 Mar)

2.5 Initially the consultation period was to run for only six weeks from 9 February to 23 March 2015. However, the Council received a number of requests to extend the period to provide more time for people to respond. Members therefore agreed to extend the consultation period to 27 March, noting that the Purdah period for the general election was to commence on 30 March 2015. On 17 March a reminder email was sent out to those on the consultation database to remind people to make their comments on the documents and inform them of the new extended date by which representations should be received.

2.6 The aim of the consultation was to invite public and stakeholder views and comments on the Schedule of Proposed Alternations, as well as to the proposed policies or sites being put forward for consideration in the other three draft Local Plan document, and to enable consultees to offer up further information, to enable the preparation of the next iterations of the documents – the pre-submission versions.

### 3. Who responded and number of representations received

3.1 52 consultation responses were received to the Proposed Schedule of Alterations. These came from various organisations and individuals, including 19 from local residents; 9 from local residents associations and interest groups; 11 from agents on behalf of landowners; and 9 from statutory bodies or NGOs. Table 3.1 below provides a full list of the respondents. In total, 209 individual comments were made that were considered and responded to by the Council (see **Appendix F**).

**Table 3.1: List of Respondents to the Proposed Schedule of Alterations to the Strategic Policies DPD**

ID No.	Respondent	ID No.	Respondent Name
148	Ghazale Jamsheed	581	Anonymous
249	Hornsey Action Group	584	Rapleys on behalf of Lasalle Investment Management
259	Archdeacon of Hampstead Fr Luke Miller	608	Home Builders Federation
262	Bilfinger GVA on behalf of Safestore	609	Apcar Smith Planning on behalf of Wedge Investments
265	Savills on behalf of NHS Property Services	621	Andie Frost
267	Jane Goodsir	623	Cllr Felicia Opoku

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268	Colin Kerr & Simon Fedida	630	Lillian Kaluma
346	Mary Rawitzer	633	Anne Gray
375	Hillcrest Residents Association	638	Fiona Scott
376	Highgate School	640	George Soteris
408	Mario Petrou	644	Wards Corner Coalition
413	Natural England	645	Keith Dobie
414	Greater London Authority	648	Jennifer Williams
415	Transport for London	657	Canal & Rivers Trust
418	Sport England	659	Haringey Federation of Residents Associations
421	Historic England	661	Tottenham Business Group
422	Environment Agency	668	Defend Council Housing
509	CgMS on behalf of Parkstock Ltd	669	HTA Design on behalf of The Woodgate Group
527	Tom Peters on behalf of WHAT	685	London Gypsy & Traveller Unit
528	Bethany Gardiner-Smith on behalf of WHAT	694	Iceniprojects on behalf of Berkeley Homes
538	Abi Sehmi	695	Russel Dove
562	Cllr John Bevan	698	Savills on behalf of the London Diocesan Fund
564	Savills on behalf of Archway Apartments	813	Lynne Zilkha
567	Page Green Residents Association	818	Our Tottenham - Claire Colomb
569	Enid Hunt	824	Janet Shapiro on behalf of Hornsey Pensioners Action Group
579	Laura Harrison	825	Andy Theodorou

### 4. Summary of main comments / issues raised and Council's response to these

4.1 At the close of consultation on the Schedule of Proposed Alterations, Council officers considered the representations received. Provided below is a summary of the main issues raised and Council's consideration and response to these.

#### Consultation

4.2 Notwithstanding the number of people notified and events held, criticism was still received on the extent and adequacy of the consultation process. In particular, a number of respondents complained about the length of the consultation period, which they considered should have been significantly longer given there were four draft documents to respond to as well as a raft of new and updated evidence base studies. Whilst meeting the obligations within the Council's adopted Statement of Community Involvement (2011), officers have subsequently meet with some of the concerned parties representing some of

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the residents groups to see how consultation on the documents could be improved, and where feasible, these new techniques and standards will be incorporated in the update to the Council's Statement of Community Involvement (which was recently out for public consultation). The Council will also be seeking to ensure that the lessons learnt, and feedback received, on the earlier consultation process can be incorporated into the pre-submission consultation.

### Alterations

4.3 In respect of the alterations to Strategic Policy SP1: Managing Growth, a large number of comments (24) were received on the **uplift in housing growth** that needs to be managed within the Borough as a result of the updated London Plan (2015). Those representing the development industry and landowners, as well as the statutory bodies, welcomed the fact that the Council had chosen to undertake a partial review of its Strategic Policies DPD to take account of the new housing figure. Conversely, a number of local residents and resident groups were concerned with the ability of the borough to accommodate and manage an additional 19,800 net new homes between 2011 - 2026, and the impact of such growth on infrastructure, amenity, open spaces and the character of the borough. Most requested that the Council reduce this figure.

4.4 Unfortunately, the opportunity to challenge Haringey's uplift to its strategic housing requirement was through the consultation and examination into the Further Alterations to the London Plan in 2014. Having now been adopted, the borough housing figures in the 2015 London Plan are a key tenet of the regional spatial strategy for the Capital, and Haringey's Local Plan must give effect to this to be considered 'sound'. As there was no scope to reduce the housing figure, no changes were made in response to the representations received. However, in responding to residents' concerns, attention was drawn to the policy requirements in the other DPDs which seek to ensure adverse impacts from development are avoided or mitigated; that new development is of high quality; and makes a significant contribution to improving the quality of the place and the local environment, as well as to residents wellbeing through delivery of community benefits. It was also noted that the Site Allocations DPD and Tottenham AAP, allocate sufficient sites with capacity to accommodate all of the growth planned, and as part of finalising the Schedule of Alterations, the Council had refreshed its Infrastructure Delivery Plan.

4.5 In addition to the amount of growth, several respondents raised concerns with **the spatial distribution**. In particular, that the ability of Tottenham to accommodate an additional 10,000 homes was unrealistic and potentially harmful to the character and environment of the area, and would exacerbate existing problems such as over-crowding and deficiencies in existing infrastructure serving the area.

4.6 In response, it was noted that both Tottenham and Haringey Heartland/Wood Green were identified in the 2013 Strategic Policies DPD as areas that can accommodate significant growth & change and have the capacity to do so. These areas are to benefit from significant inwards investment, delivering new jobs, better transports links, and new and improved social infrastructure. As a percentage of land area, growth areas represent a relatively small portion of the borough, the vast majority of existing communities will not be subject to significant change, including communities within Tottenham, and local planning policies are in place to preserve existing character, especially that of value to the local community. It was also noted that the new housing is

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required to meet local housing needs to address matters such as over-crowding. Without new housing provision, such issues will remain and are likely to worsen. No changes were therefore proposed to the Alterations as a result of these comments.

4.7 The vast bulk of comments received were made in respect of the Alterations to Strategic Policy SP2: Housing. In particular, the key issue raised was in respect of the policies on **affordable housing**. Firstly, there was opposition from local residents and community groups to **reducing the strategic affordable housing target from 50% to 40%**. Most considered affordable housing to be an essential component to maintaining community life, enabling low income households to continue to live in Haringey and contributing to the vibrant and diverse communities that exist. While the development industry broadly supported the reduction, the reason why the affordable housing target has to be reduced remains the fact that current evidence on development viability does not support the retention of the 50% target.

4.8 Related to the above, were concerns regarding the **affordability of the affordable housing** to be secured. Most respondents consider 'affordable rent', which can be up to 80% market rent, to not be affordable in a Haringey context. Several respondents requested that social rented affordable housing be prioritised through the policy. In response, it was noted that, while the definition of affordable housing includes both 'affordable rent' and 'social rent', it is only the former that can attract grant. While the Council can negotiate provision of 'social rent', the absence of grant and rents at up to 80% impacts significantly on viability and would result in significantly less affordable housing being secured. It is therefore a trade-off between the level of affordability and the amount of affordable housing to be secured. The revised target of 40% is predicated on securing 'affordable rent and intermediate housing'. If this was to be re-orientated to securing 'social rent', this target would need to be drastically reduced further, which the Council considers unacceptable. Further amendments were however proposed to more clearly set out the definition of 'affordable housing' in the glossary and a commitment was also made to reviewing all four documents to ensure the affordable housing terminology used is correct and consistent.

4.9 As part of the proposed Alterations, the Council had consulted on whether or not the existing policy seeking an **affordable housing contribution from small development schemes** should be withdrawn in light of a ministerial statement stating that small scheme should be effectively exempt from an affordable housing obligation. The Council had maintained that the existing policy, having been subject to consultation and EiP and, through that process, been found to comply with national policy, should remain in effect. The Council's position was supported by local resident groups but the development industry pushed for its removal on the basis that the ministerial statement was to have the status of planning policy. However, since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged in the courts and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. The extant policy has been subject to consultation and EiP, found consistent with the NPPF, and will therefore be retained unchanged.

4.10 The other key issues that drew significant response and opposition was to the addition of a policy addressing **housing estate renewal**. In particular, there was concern that renewal would result in a significant loss of social rented council housing, privatisation, higher densities impacting on residential amenity, and that there was no clear provision for existing council tenants; specifically no clear information as to whether existing tenants would be offered their tenancy back and/or have the same/similar conditions in regards to their tenancy should they be offered a tenancy. It was felt that these estates

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should be improved through the Decent Homes programme, and that, if estates were subject to renewal, there should be not net loss of social housing, with tenants offered similar terms as existing.

4.11 In response it was noted that the plan does not propose a reduction in the total social rented housing stock as a result of estate renewal. Where estate renewal takes place, the total existing social rented floorspace will be replaced but the opportunity will be given to changing the housing mix, so that the new social rented housing might best meet current local housing needs (i.e. replacing 1 & 2 bedroom social rented homes with 3 or 4+ bed family social rented housing). This may result in a reduced amount of total social homes but should ensure the housing better meets the acute housing needs of the Borough. Replacement with higher density development would only be acceptable where it was proposed to improve the public transport accessibility of the site or where existing densities were significantly below what could be achieved on the site through application of the London Plan density matrix.

4.12 It was also noted that the approach to consulting with, and engaging, existing residents in any development proposal on these sites will be set out in the Council's Housing Strategy. Further amendments were therefore made to provide clarification to the outcomes sought by estate renewal and to introduce better linkages with the Council's Housing Strategy, which sets out Council's overall proposals for effectively managing its housing stock and the engagement to be undertaken with existing residents.

4.13 Comments were also received to the alternation Strategic Policy 8 and, therein, to the **projections for employment land demand** for B Class uses (Business, Light Industrial, General Industrial, and Storage & Distribution). The alteration responded to the findings of the Haringey Employment Land Review (2015), which projected a decrease in the forecast demand of new industrial floorspace from 137,000 m<sup>2</sup> to 23,000m<sup>2</sup>. The responses perceived this change to mean a loss of employment space and existing businesses, while others queried whether it was counterproductive to reduce the ambition for new employment floorspace at a time when Haringey's population and economy is projected to grow so rapidly, by the London Plan at least.

4.14 In response, it was clarified that the figure of 23,000m<sup>2</sup> still represented a demand for additional employment floorspace, above that already provided across the Borough. The updated evidence base therefore continues to support the strategic policy to safeguard existing employment floorspace for employment uses. It was also noted that, floorspace in B8 uses (Storage and Distribution) will need to be reconfigured over the plan period to meet projected demand for B1a/b (Office and Business floorspace). This change in employment needs is to be realised through reclassification of certain industrial estates to Local Employment Regeneration Areas, providing for employment-led mixed use development that intensifies the employment use of sites, delivering greater job opportunities.



Appendix A – Public Notice of the draft Development Management Policies Issues and Options consultation

28 Friday, February 13, 2015

Public Notices

Public Notices

**LONDON BOROUGH OF HARINGEY TOWN & COUNTRY PLANNING GENERAL DEVELOPMENT ORDER 1988 (as amended) PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990 PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) REGULATIONS 1990**

In order to view the full application details and submit comments please go to the following website address: <http://www.planningservices.haringey.gov.uk/portal/servlets/ApplicationSearchServlet>  
Any representations concerning the application should be made within a period of 21 days

**Affecting Conservation Area**

- Site/Address: 52 Birchwood Road N8 7NG  
Reference: HG/2015/0237
- Site/Address: 81 Priory Gardens N6 5QU  
Reference: HG/2015/0268
- Site/Address: 26 Kings Avenue N10 1PB  
Reference: HG/2015/0269
- Site/Address: 638A High Road N17 OFD  
Reference: HG/2015/0270
- Site/Address: 38 Stapleton Hill Road N4 3OD  
Reference: HG/2015/0271
- Site/Address: 5 Bruce Grove N17 6RA  
Reference: HG/2015/0273
- Site/Address: 638A High Road N17 OFD  
Reference: HG/2015/0274
- Site/Address: Land Between 72-76 Tetherdown N10 1NG  
Reference: HG/2015/0275
- Site/Address: Pavement fronting Page Green Terrace, High Road N15 SPB  
Reference: HG/2015/0277
- Site/Address: Flat A 66 Florence Road N4 4DP  
Reference: HG/2015/0278
- Site/Address: 20 Talbot Road N15 4DH  
Reference: HG/2015/0282
- Site/Address: 64 Grove Park Road N15 4SN  
Reference: HG/2015/0283
- Site/Address: 18 Avenue Road N6 5DW  
Reference: HG/2015/0288
- Site/Address: 11 Southern Road N2 9LH  
Reference: HG/2015/0289
- Site/Address: 48 Gramere Road N10 2DJ  
Reference: HG/2015/0302
- Site/Address: 14 Cranbourne Road N10 2BT  
Reference: HG/2015/0303
- Site/Address: 108 Crouch Hill N8 9DY  
Reference: HG/2015/0308
- Site/Address: 21-23 The Broadway N8 8DU  
Reference: HG/2015/0313
- Site/Address: 15 Collingwood Avenue N10 3EH  
Reference: HG/2015/0316

**Haringey Local Plan: Alterations to Strategic Policies, Development Management Policies, Site Allocations Development Plan Document, Tottenham Area Action Plan**

The Council is consulting on its emerging Local Plan documents. This consultation is an initial consultation (Regulation 18 under the Town and Country Planning (Local Planning) (England) Regulations 2012) introducing the content that the documents will cover.

The documents the Council are consulting on are:  
 - The Alterations to Strategic Policies Document  
 - Development Management Policies Consultation Document  
 - Site Allocations Consultation Document  
 - Tottenham Area Action Plan Consultation Document and  
 Together these documents will form the Local Development Plan for the area and will be used to make decisions on Planning Applications up until 2026.

The documents are available to view at 8th Floor, River Park House, N22 8HG, the Civic Centre, High Road, Wood Green, N22 8LE, in local libraries and online at [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)

Responses should be made by email to [ld@haringey.gov.uk](mailto:ld@haringey.gov.uk) or in writing to Planning Policy, 8th Floor, River Park House, Wood Green, N22 8HG. The date for responses to be received has changed from Monday 23rd March 2015 to Friday 27th March 2015 by 5pm.

For further details please contact the Planning Policy Team on 020 8489 1479 or email [ld@haringey.gov.uk](mailto:ld@haringey.gov.uk).

Public Notices

**ROAD TRAFFIC REGULATION ACT 1984 – SECTION 14(1)**  
The Council of the London Borough of Haringey intends to make the Temporary Traffic Orders described below:

Brantwood Road N17	
Reason for 14(1) Order – Footway paving works	
Operational dates	General Effect of Order
Date: 23-02-15 to 30-04-15 Time: 24hrs	Suspension of parking on both sides of the road between High Road and Tariff Road, N17. No stopping/waiting/loading/unloading

High Road/ Bromley Road N17	
Reason for 14(1) Order – Footway paving works	
Operational dates	General Effect of Order
Date: 23-02-15 to 30-04-15 Time: 24hrs	<ul style="list-style-type: none"> <li>• Suspension of parking on both sides between number 674-710 High Road, N17</li> <li>• Suspension of parking outside number 1-7 Bromley Road, N17</li> </ul> No stopping/waiting/loading/unloading

Woodside Avenue N6	
Reason for 14(1) Order – To provide safe and clear access of large vehicle	
Operational dates	General Effect of Order
Date: 17-03-05 to 20-04-15 Time: 24hrs	Suspension of parking from its junction of Great North Road, N6 to the start of the double yellow lines, immediately before the railway bridge. No stopping/waiting/loading/unloading

Endymion Road/Alroy Road N4	
Reason for 14(1) Order – To construction a raised tarmac junction table	
Operational dates	General Effect of Order
Date: 05-03-15 to 30-05-15 Time: As and when indicated by signs and barriers	Road closure, at the junction of Endymion Road and Alroy Road, N4 No stopping/waiting/loading/unloading

Gloucester Road N17	
Reason for 14(1) Order – Replace manhole cover in the carriageway	
Operational dates	General Effect of Order
Date: 05-03-15 to 12-03-15 Time: 9:30 to 15:00	Road closure, from its junction with William Road, N17 to Freedom Road, N17 No stopping/waiting/loading/unloading

The provisions of the Orders shall apply only at such times and as directed by traffic signs. For road closures, alternative routes will be directed by traffic signs. Access will be maintained where possible. For more information contact – 0208 489 1300 or visit our website at [www.haringey.gov.uk/traffic\\_orders](http://www.haringey.gov.uk/traffic_orders)  
13th February 2015

**DOREEN MARY TWEEN (Deceased)**

Notice of Intention to Apply for a claim against an estate of the Estate of the late Doreen Mary Tween, late of 140 Lynchford Road Wood Green, London N22 8DU, who died on 12th October 2014. I intend to send particulars thereof in writing to the interested parties on or before 24/03/2015, after which date the Estate will be distributed. I intend only to claim the proceeds of which they have had notice.

ELICITORS LLP  
11th Floor, 15 Spinnaker Road  
New Barnet EN5 1QU

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Public Notice

**ROAD TRAFFIC REGULATION ACT 1984 – SECTION 14(1)**  
The Council of the London Borough of Haringey has made the Temporary Traffic Orders described below:

Houghton Road N15	
Reason for 14(1) Order – Works to raise kerb stones	
Operational dates	General Effect of Order
Date: 16-02-15 to 23-02-15 Time: 08:30 to 15:30	Suspension of parking from its junction with West Green Road, N15 No parking/waiting/loading/unloading

Eade Road N4	
Reason for 14(1) Order	
Operational dates	General Effect of Order
Date: 27-02-15 to 28-10-16 Time: 18:00 to 08:00	Suspension of parking on Eade Road, N4 from its junction with seven Sisters Road on both sides of the road. No parking/waiting/loading/unloading

High Road N22	
Reason for 14(1) Order – Carriageway Resurfacing	
Operational dates	General Effect of Order
Date between : 02-03-15 to 01-12-15 As indicated by traffic signs Times: 20:00 to 05:00 As indicated by traffic signs	Suspension of parking: 1. Westbury Avenue, N22 between Lancelotti Road, N22 and High Road N22 (North side of carriageway). 2. Hornsey Park Road, N8 outside number 40-56 on both sides of the road. 3. West Green Road, N15- Green Gate Common side between Milton Road, N15 and Willow Walk, N15 4. High Road, N22 Between Station Road, N22 and Turnpike Road, N8 No parking/waiting/loading/unloading

High Road/Moselle Place/Brereton Road/Paxton Road/Worcester Avenue/Park Lane Church Road/Church N17	
Reason for 14(1) Order – Works to carriageway	
Operational dates	General Effect of Order
Date: 23-02-15 to 23-08-16 Times: As indicated by traffic signs	<ol style="list-style-type: none"> <li>1. HIGH ROAD, N17: bus stop to be suspended and bus stops relocated location from White Hart Lane Sports centre on both sides of the road.</li> <li>2. MOSELLE PLACE, N17: closure with its junction with High Road, N17 north side of Moselle Place, N17 suspension of parking 20 metres away from the junction on both sides of the road.</li> <li>3. BRERETON ROAD, N17 closure: at its junction with High Road, N17 suspension of parking 20 metres from its junction on both sides of the road.</li> <li>4. PAXTON ROAD, N17 closure: at its junction with High Road, N17 suspension of parking at this location.</li> <li>5. WORCESTER AVENUE, N17 suspension of parking.</li> <li>6. PARK LANE, N17 suspension of parking from its junction with High Road, N17 to St Pauls Road, N17.</li> <li>7. CHURCH ROAD, N17 suspension of parking on both sides of the road.</li> <li>8. CHURCH LANE, N17 suspension of parking on both sides of road.</li> </ol> No parking/waiting/loading/unloading

Cromwell Avenue N6	
Reason for 14(1) Order – Building works	
Operational dates	General Effect of Order
Date: 02-03-15 to 22-7-15 24hrs	Suspension of parking outside Clotiers Court 77 Cromwell Avenue N6 No parking/waiting/loading/unloading

Tile Kiln Lane N6	
Reason for 14(1) Order – Carriageway repair	
Operational dates	General Effect of Order
Date: 21-03-15 to 28-03-15 24hrs	Road closure of Tile Kiln Lane, N6 between its junction with Hornsey Lane, N6 and number 10 Tile Kiln Lane, N6 No parking/waiting/loading/unloading

The provisions of the Orders shall apply only at such times and as directed by traffic signs. For road closures, alternative routes will be directed by traffic signs. Access will be maintained where possible. For more information contact – 0208 489 1300 or visit our website at [www.haringey.gov.uk/traffic\\_orders](http://www.haringey.gov.uk/traffic_orders)  
13th February 2015

## **Appendix B - Public Notice sent out seeking consultation**

### **London Borough of Haringey Draft Local Plan Consultation (Regulation 18)**

The Council is writing to consult on Haringey's draft development plan documents. This suite of documents will form the new Haringey Local Plan, which will become the basis upon which planning applications are decided in the borough. As part of the statutory plan making process, the Council is required to consult. We would be grateful for your comments on the proposed documents during the coming consultation period.

#### **Subject matter:**

The four Development Plan Documents below will form Haringey's Local Plan for the period to 2026.

- Alterations to the Strategic Policies (DPD) (adopted 2013)
- Draft Tottenham Area Action Plan: Preferred Option
- Draft Development Management Policies (DPD): Preferred Option
- Draft Site Allocations (DPD): Preferred Option

The Strategic Policies sets out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026. A partial review is proposed to take account of new growth requirements for the Borough as set out in the London Plan as well as the findings of updated evidence base studies. A schedule of proposed changes is subject to public consultation and comment.

The draft Tottenham Area Action Plan proposes a comprehensive set of policies, proposals and site allocations for future development within the Tottenham area based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

The draft Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development across the borough. Once adopted, the policies will supersede those contained in the Haringey Unitary Development Plan (2006).

The draft Site Allocations DPD allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including shopping frontages and reclassification of industrial designated land), outside of the Tottenham AAP area. Once adopted, the proposal sites and designations will appear on the Haringey policies map, replacing that which accompanies the Haringey Unitary Development Plan (2006).

#### **Area covered:**

The draft Tottenham Area Action Plan area comprises the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of the Bruce Grove, St. Ann's and Seven Sisters.

## Appendix B Alterations to Strategic Policies Consultation Report.

The Strategic Policies (Partial Review) and draft Development Management Policies apply to the entire Borough, while the draft Site Allocations DPD applies to that part of the Borough outside of the draft Tottenham AAP boundary.

### **Period within which representations must be made:**

Representations can be made over the six week publication period, beginning on Monday 9<sup>th</sup> February and ending at 5pm on Monday 23<sup>rd</sup> March 2015.

### **Where have the documents been made available, and the places and times at which they can be inspected:**

The four DPDs and supporting documentation are available for inspection at the following locations:

- Council's Local Plan Consultation website: [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan) ;
- Council's Planning Office: River Park House, 6<sup>th</sup> Floor, Wood Green, N22 8HQ;
- Council's Civic Offices, High Road, Wood Green, N22 8LE;
- During normal opening hours at all Haringey Council Libraries.

### **Making a representation:**

The Council welcomes comments on the four DPDs. At this early stage in the plan making process there is no prescribed form for how comments are to be made, however, it does help the Council to analyse comments if the comment references the part or section of the document to which they apply. The Council would also encourage people to suggest the changes they would make to the document to address their concern.

Representations can be made:

- by email at: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk); or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ.

Please note that all representations received will be made publicly available. If you wish to be notified about the progress of the plan, please note this in your response to the consultation.

**Comments must be received by 5pm on Monday 23<sup>rd</sup> March 2015.**

**Further information:**

Appendix B Alterations to Strategic Policies Consultation Report.

For any further enquiries, please email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or contact the Local Plan Team on Tel. 020 8489 1479.

Appendix B Alterations to Strategic Policies Consultation Report.

## **Appendix C - Letter of Notification sent to Consultees on the Consultation Database and Specific Consultation Bodies**

Dear Consultee,

### **London Borough of Haringey Draft Local Plan Consultation (Regulation 18)**

The Council is writing to consult on Haringey's draft development plan documents. This suite of documents will form the new Haringey Local Plan, which will become the basis upon which planning applications are decided in the borough. As part of the statutory plan making process, the Council is required to consult. We would be grateful for your comments on the proposed documents during the coming consultation period.

#### **Subject matter:**

The four Development Plan Documents below will form Haringey's Local Plan for the period to 2026.

- Alterations to the Strategic Policies (DPD) (adopted 2013)
- Draft Tottenham Area Action Plan: Preferred Option
- Draft Development Management Policies (DPD): Preferred Option
- Draft Site Allocations (DPD): Preferred Option

The Strategic Policies sets out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026. A partial review is proposed to take account of new growth requirements for the Borough as set out in the London Plan as well as the findings of updated evidence base studies. A schedule of proposed changes is subject to public consultation and comment.

The draft Tottenham Area Action Plan proposes a comprehensive set of policies, proposals and site allocations for future development within the Tottenham area based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

The draft Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development across the borough. Once adopted, the policies will supersede those contained in the Haringey Unitary Development Plan (2006).

The draft Site Allocations DPD allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including shopping frontages and reclassification of industrial designated land), outside of the Tottenham AAP area. Once adopted, the proposal sites and designations will appear on the Haringey policies map, replacing that which accompanies the Haringey Unitary Development Plan (2006).

#### **Area covered:**

## Appendix B Alterations to Strategic Policies Consultation Report.

The draft Tottenham Area Action Plan area comprises the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of the Bruce Grove, St. Ann's and Seven Sisters.

The Strategic Policies (Partial Review) and draft Development Management Policies apply to the entire Borough, while the draft Site Allocations DPD applies to that part of the Borough outside of the draft Tottenham AAP boundary.

### **Period within which representations must be made:**

Representations can be made over the six week publication period, beginning on Monday 9<sup>th</sup> February and ending at 5pm on Monday 23<sup>rd</sup> March 2015.

### **Where have the documents been made available, and the places and times at which they can be inspected:**

The four DPDs and supporting documentation are available for inspection at the following locations:

- Council's Local Plan Consultation website: [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan) ;
- Council's Planning Office: River Park House, 6<sup>th</sup> Floor, Wood Green, N22 8HQ;
- Council's Civic Offices, High Road, Wood Green, N22 8LE;
- During normal opening hours at all Haringey Council Libraries.

### **Making a representation:**

The Council welcomes comments on the four DPDs. At this early stage in the plan making process there is no prescribed form for how comments are to be made, however, it does help the Council to analyse comments if the comment references the part or section of the document to which they apply. The Council would also encourage people to suggest the changes they would make to the document to address their concern.

Representations can be made:

- by email at: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk); or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ.

Please note that all representations received will be made publicly available. If you wish to be notified about the progress of the plan, please note this in your response to the consultation.

**Comments must be received by 5pm on Monday 23<sup>rd</sup> March 2015.**

Appendix B Alterations to Strategic Policies Consultation Report.

**Further information:**

For any further enquiries, please email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or contact the Local Plan Team on Tel. 020 8489 1479.

Yours sincerely,

*Stephen Kelly*

Stephen Kelly, Assistant Director, Planning

## Appendix D - Newspaper advert

### **Haringey Local Plan: Alterations to Strategic Policies, Development Management Policies, Site Allocations Development Plan Document, Tottenham Area Action Plan**

The Council is consulting on its emerging Local Plan documents.

This consultation is an initial consultation (Regulation 18 under the Town and Country Planning (Local Planning) (England) Regulations 2012) introducing the content that the documents will cover.

The documents the Council are consulting on are:

- The Alterations to Strategic Policies Document
- Development Management Policies Consultation Document
- Site Allocations Consultation Document
- Tottenham Area Action Plan Consultation Document and

Together these documents will form the Local Development Plan for the area and will be used to make decisions on Planning Applications up until 2026.

The documents are available to view at 6th Floor, River Park House, N22 8HQ, the Civic Centre, High Road, Wood Green, N22 8LE, in local libraries and online at [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)

Responses should be made by email to [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk) or in writing to Planning Policy, 6th Floor, River Park House, Wood Green, N22 8HQ. Responses should be received by **5pm Monday, 23rd March 2015**.

For further details please contact the Planning Policy Team on 020 8489 1479 or email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk).



Appendix B Alterations to Strategic Policies Consultation Report.

**Appendix E - List of Contacts on the Council's Consultation Database**

A Anva Ltd	Circle Housing Group	Sahil HA	Muswell Hill & Fortis Green Association
A P T Consulting	Andrew Mulroy Architects Ltd	W and M James	E Webb
A S Z Partners Ltd	Anglo Asian Women's Association	M Satyanarayana	J Warburton
A. E. Butler & Partners	Anthony Byrne Associates	M Lamb	J Vellapah
A.C.H. Turkish Speaking Pensioners Club	Apcar Smith Planning	A Ayub	N Triviais
Aarogya Medical Centre	Arab Society	G Holt	M Tomlinson
Abbeyfield (North London) Society	Arbours Association	C Narrainen	J Toller
Abbeyfield Society	Architectural Heritage Fund	ER Nurten	J Thompson
Access Committee for England	Architectyourhome-Highgate	A O.Olufuriwa	R Tedesco
ACHE (Action for Crouch End & Hornsey Environment)	Archi-Tone Ltd	R David	A Taylor-Smith
Adams Holms Associates	Archway Road Residents Association	L Zilkha	E Sutton-Klein
Adult Literature Group	Archway Road Tenants Association	J Woodcock	H Stuchtey
Adult Literature Group	ARHAG Housing Association	H Wood	C Menich
Adult Literature Group	Arnold Road Residents Association	K Wong	M Stoves
African Caribbean Association	Arnos Grove Medical Centre	J Wise	K Stanfield
African Cultural Voluntary Organisation	Arta Architectural	T Wing	M Edwards
African Women's Welfare Group	Ashdown Court Residents Association	C Whitehead	M Myers
Africans & Descendants Counselling Services Ltd	Asian Carers Support Group	KD Plutz	C Olive
Age UK	Asian Community Centre	R Perry	H Osman
Agudas Israel	Asian Community Group	A Papadopoulos	M Petrou
AH Architects	Asian Family Group	P Pachovský	A.West
Air Transport Users Council	Aspire Design & Survey Ltd	C Owen	B Bermange
Aitch Group	ASRA (GLHA)	S Overell	E Soundaranayagam
AJ Architects	Avenue Mews Tenants Association	B Blount	E Ryan
Alan Cox Associates	Aztech Architecture Ltd	K Elias	T Ryan
Albany & Culross Close Residents Association	Altaras Architecture	Mr Kerr	N Rusz
Alexander Elliot Ltd	Anatolitis Associates	F Madon	J Rosser

## Appendix B Alterations to Strategic Policies Consultation Report.

Alexandra Mansions Tenants Association	Ancient Monuments Society	R Warbus	J Rollings
Alexandra Palace Action Group	Andrew Kellock Architects	C Roberts	L Reith
Alexandra Palace Residents Association	Bedford Road Tenants Association	G Ormel	B Rawlings
Alexandra Park/Grove Lodge Meadow Allotments	Belcher Hall Associates	C Ogilvie-Browne	K Pyper
Alexandra Primary School	Bell Residents Association	J Oerton	A Poli
Alexandra Residents Association	Belmont Infant & Junior School	C Norton	P McNamara
Alexandra Tenants Association Group	Bethel United Church of Jesus Christ	J Nicholas	R Max
Allenson House Medical Centre	Bhagwati Sai Culture & Social Centre	O Natelson	K Mason
Ally Pally Allotment Society	Bibles Christian's Assembly	J Naeem	C Marr
Al-Rasheed Dauda Architect	Bicknell Associates Chartered Architects	E Murphy	J MacKay
AMEC for National Grid	Blitzgold Ltd	D Morris	S Lubell
Bahai Community	Born Again Evangelistic	S Moridi	J Long
Bangladesh Muslim Organisation	Haringey Police	Haringey Deaf Group	Pollard Thomas & Edwards Architects
Bangladeshi Cultural Society	Bostall Architecture Services	F Morgan	A Lister
Bangladeshi Women's Association	Bounds Green & District Residents Association	M Mitchell	B and L Lewis
Baptist Church	Bounds Green Group Practice	S Miller	R Lellis Ferreira
Barnet, Enfield and Haringey Health Authority	Bounds Green Health Centre	C McNamara	E Lazell
Barratt East London	Bounds Green Infant & Junior School	L McNamara	C Kronick
Bashkal & Associates	British Telecom Plc	Yabsley Stevens Architects	H Kinnersley
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	London TravelWatch	P Caddu	Urban Homes Ltd
Bowes Park Community Association	Broadwater Farm Community Centre	F Joubert	A Kikkides
Bowes Park Community Association	Broadwater Farm Community Health Centre	N Jenkins	G Kagan
Bracknell Close/Winkfield Road Residents Association	Broadwater Farm Residents Association	T Hopkins	L and M Graham
Brendan Woods Architects	Broadwater Residents Association	M Hone	M Godinho
Bridge House Health Care Centre	Brown & Co (Surveyors) Ltd	E & B Holgado	S Fuller
Briffa Phillips Architects	Bruce Castle Village Residents Association	S Holden	J Friedman
Britannia Hindu Temple Trust	Buckingham Lodge Residents	M Herbert	H French

## Appendix B Alterations to Strategic Policies Consultation Report.

Brunswick Park Health Centre	Association		
CABE	Building Design Consultants	F Heigham	E Graham
Calvary Church of God in Christ	CA (UK) Ltd	C Hawkins	S Fewlass
Campbell Court Residents Association	CAAC Highgate	L Hansen-Bay	C Ferrarello
Campsbourne Baptist Church	Carter Surveying Associates	S Brice	P Fearon
Campsbourne Centre	Casch	P Hancock	J Dixon
	Caryatid Architects	D Burrowes MP	C Evans
	Casa de la Salud Hispano Americana		
Campsbourne Infant School	CASAHA	P Bumstead	S Ettinger
Campsbourne Residents Association	CASCH	P Brown	C Elser
Campsbourne Tenants Association	CASCH	J Bowden	K Edwards
Capital Architecture Ltd	CASE	T Blake	A Davies
Caribbean Senior Citizens Association			
Carolyn Squire	Causeway Irish	A Blackburn	F Da Rocha
Carr Gomm Society	CB Architects	M Bauss	R Cowan
Chestnut Northside Residents Association	Cemex (UK) Operation Ltd	F Basham	S Cook
Chestnuts Community Centre	Central & Cecil	M Attenborough	K Connelly
Chinese Community Centre	Centre for Accessible Environments	J Athanassiou	A Christofis
Chomley & Causton Residents Association	Charisma Baptist Church	R Antoniadis	E Kaczynska-Nay
Chris Thomas Ltd	Charlton House Medical Centre	P Amadi	C Jenkins
	Cherry Tree House Residents	L Alliston	R Franks
	Chestnut Area Residents Association (CARA)	Wood Green Regeneration	S & D Egerton
Christ Apostolic Church Kingswell	Wood Green Area Youth Project	A Adamides	TWG FoE/FoE London
Christ Church	Clyde Area Residents Association	L Sifri	T Cornish
Christchurch West Green	Coldfall Community Centre	C Chadwick	L Brusati
Christopher Wickham Associates	Coldfall Primary School	B James	T Brierley
Church Commissioners			
Church Crescent Residents Association	Coleraine Park Primary School	B Maltz	A Leigh
Circle 33 Home Ownership Ltd	Collage Arts	F Poli	B Hyams
	Commerce Road Tenants Association	R Payne	V R Berry
Circle 33 Housing Group	Community Action Sport	H Redler Hawes	B Temple-Pediani
Clark Designs Ltd	Community Church of God	J Murray	L Forrest-Hay
Clarke Desai Ltd	Community Gay & Lesbian Association		
Claudio Novello Architects		C King	S Lane

Appendix B Alterations to Strategic Policies Consultation Report.

Client Design Services Ltd	Community Response Unit	J Brooks	E Gray
Cllr Adamou Gina	Community Safety Unit	C Warburton	N Venning
Cllr Alexander Karen	Confederation of British Industry	D Lichtenstein	P Nicolaides
Cllr Allison Rachel	Co-op Homes	Cllr Erskine Sophie	P Rose
Cllr Amin Kaushika	Haringey Fire Service	Cllr Gibson Pauline	Cllr Newton Martin
Cllr Basu Dhiren	Cllr Butcher Edmund	Cllr Gmmh Rahman Khan	Cllr Peacock Sheila
Cllr Beacham David	Cllr Canver Nilgun	Cllr Goldberg Joe	Cllr Reece Katherine
Cllr Bevan John	Cllr Christophides Joanna	Cllr Gorrie Robert	Cllr Reid Errol
Cllr Bloch Jonathan	Cllr Cooke Matt	Cllr Griffith Eddie	Cllr Reith Lorna
Cllr Brabazon Zena	Cllr Davies Matt	Cllr Hare Bob	Cllr Rice Reg
Cllr Browne David	Cllr Demirci Ali	Cllr Jenks Jim	Cllr Schmitz David
Cllr Bull Gideon	Cllr Diakides Isidoros	Cllr Kober Claire	Cllr Scott Nigel
Cllr Strang Paul	Cllr Dogus Dilek	Cllr Mallett Antonia	Cllr Solomon Juliet
Cllr Strickland Alan	Cllr Egan Patrick	Cllr McNamara Stuart	Cllr Stanton Alan
Cllr Vanier Bernice	Cllr Ejiofor Joseph	Cllr Meehan George	Cllr Stennett Anne
Cllr Weber Lyn	Cllr Engert Gail	Cllr Whyte Monica	Cllr Stewart James;
Cornerstone Trading	Cllr Waters Ann	Cllr Williams Neil	Cllr Winskill David
Corporation of London	Cllr Watson Richard	Lynne Featherstone	David Lammy
Council for British Archaeology	Cllr Wilson Richard	Xeva Design Concepts	
Crammond Browne Architects	Metropolitan Development Service	N Oparvar	Urban Futures London Ltd
Crawford Partnership	Coppetts Residents Association	R Ortiz	E Barnett
CRH Tenants Association	Crouch End Health Centre	U Riniker	A Rossi Carter
Cromwell Avenue Residents Association	Crouch End Traders Association	D Baker	T Baker
Crouch End Dental Practice	Crouch End URC Church	C Mayled	G Forbes
Crouch End open Space (CREOS)	Crowland Primary School	J Munday	B Nottage
D R M Associates	Cube Building Consultancy	N Embling	F Limbaya
DASH	CUE	M Eastmond	F Calboli
David Langan Architects	Crouch Hall Road Surgery	A Tiffney	H Nieuwstadt
Dental Health Centre	CUFOS Community Centre	3 Valleys	S Penny
		African Caribbean Leadership Council	
Dental Practice	Cypriot Centre	Alexandra Palace & Park CAAC	British Waterways
Dental Surgery	Cypriot Women's League		Bruce Grove Primary School
Department for Culture Media and Sport	Cyprus Turkey Democratic Association	Alexandra Palace Charitable Trust	Burghley Road Residents Association
		Al-Hijra Somali Community Association	
Department for Education	Downhills Infant & Junior School	Alliance Planning	Buying Solutions
Department for Transport	DPA (London) Ltd		CARA Irish Housing Association

## Appendix B Alterations to Strategic Policies Consultation Report.

Department for Work and Pensions	DPDS Consulting Group	The North London Gay & Lesbian Association	CB RE
Devonshire Hill Primary School	Women & Medical Practice	Angolan Community Association	Twentieth Century Society
Direct Planning Ltd	Duckett Dental Surgery	Arriva London	CGMS Consulting
Discount Plans Ltd	Earlsmead Primary School	Asian Action Group	Chestnuts Northsid Residents Assn
Dron & Wright	Eastbourne Ward Residents Association	Asian Women's Association	Chettle Court Ranger Youth (FC)
English Heritage - London Region	Ebenezer Foundation Advisory Association	Avenue Gardens Residents Association	Cheverim Youth Organisation
Environment Agency	Ecodomus	Haringey Arts Council	Chitts Hill Residents Association
FA Drawing Service	Haringey Group London Wildlife Trust	The Georgian Group	Groundwork London
Faith Baptist Church	Whitehall Community Centre	The Gainsborough Clinic	Turkish Cypriot Women's Project
Faith Mosque	White Young Green Planning	Avenue Gardens Residents Association	Turkish Cypriot Peace Movement in Britain
Faith Restoration Ministry	Edgcott Grove Residents Association	Barnard Hill Association	Alderton Associates
Family Health Service Authority	Eldon Road Baptist Church	Barton Willmore	Christian Action (Enfield) Housing Association
Family/Landmark Housing Association	EMJCC Community Side	Bellway Homes	City Planning Group
Federation of African Peoples Organisation	ENKI Architectural Design	Beresford Road Residents Association	Civil Engineers Ltd
Ferry Lane Estate Residents Association	Eritrean Community in Haringey	Black & Ethnic Minority Carers Support Service	Cluttons LLP
Finsbury Park Track & Gym	Ermine House Residents Association	BME Community Services - Selby Centre	College of Haringey, Enfield and North East London
FirstPlan	Ermine Road Residents Association	BPTW	Colney Hatch Management Company Ltd.
Flower Michelin Ltd	Evering Pentecostal Church	Friends of Brunswick Road Open Space	Connexions
Forestry Commission England	Extra Windows	Friends of the Earth Tottenham & Wood Green	Council of Asian People (Haringey)
Forthright Design Ltd	Friends of Bruce Castle	Friends of Cherry Tree Wood	Department of Environment Food and Rural Affairs
Fortismere Residents Association	FQW	Friends of Chestnut Park	Crossover Group
Fortismere School	Frederick Knight Sports Ground	Friends of Crouch End Open Space	Cypriot Elderly & Disabled Group
Friends of Priory Park	Freight Transport Association	Friends of Downhills Park	Department for Business, Innovation and Skills

## Appendix B Alterations to Strategic Policies Consultation Report.

Friends of Stationer's Park	Friends of Albert Road Recreation Ground	Muswell Hill and Hornsey Friends of the Earth	Department for Business, Innovation and Skills
Friends of the Earth (London Region)	Friends of Bowes Park Garden	Friends, Families and Travellers and Traveller Law Reform Project	Alexandra Park School
Friends of Tottenham Cemetery	Friends of Hornsey Church Tower	Fusion Online Limited	Derek Horne & Associates
Friends of Wood Green Common	Friends of Ivatt Way	Genesis Housing Group	Dialogue Communicating Planning
G T Project Management	Friends of Lordship Rec	Glasslyn, Montenotte Tivoil Road Residents Assoc.	DP9 Planning Consultants
G V Building Services Ltd	Friends of Markfield Recreation Ground	GLC-RAG	Drivers Jonas Deloitte
Gage Limited	Friends of Muswell Hill Playing Fields	Grace Organisations - Elderly Care Centre	The Old Surgery
Garden Drive Neighbourhood Watch	Friends of Muswell Hill Playing Fields & Coldfall Wood	Greek Cypriot Women's Organisation	Ethiopian Community Centre
Garden Residents Association	Friends of Noel Park	GreenN8 Community Group	Euroart Studios
Haringey Cycling Campaign	Friends of Paignton Road	Gt. Lakes Initiative & Support Project	Family Mosaic
Haringey Fire Service	Friends of Queen's Wood	Haringey Chinese Centre	Fields in Trust
Haringey NHS	Friends of Railway Fields	Jala - Johnnanthan A Law and Associates	First Plus Planning
Haringey Peace Alliance	HAVCO	Jamait-Al-Nissa	Gf Planning Limited
Haringey Play Association	Her Majesty's Court Service	The Archdeacon of Hampstead	Gladesmore Community School
Haringey Racial Equality Council	Wood Green Black Tenants Group	Joint CAAC	Tynemouth Medical Practice
Haringey Somali Community & Cultural Association	HFRA (Haringey Federation of Residents Association)	Jones Lang LaSalle Planning	Gladesmore Girl's & Young Women's Club
Haringey Teaching Primary Care Trust	Home Builders Federation - London	King Sturge Llp	Gladesmore Youth Club
Haringey Womens Forum	Home Office	Knight Frank	Globe Projects Ltd
Hornsey Lane & Colwick Close RA	Home-Start Haringey	Woodlands Park Infant & Junior School	Goan Community Centre
Hornsey Lane Association	Wood Green Dental Practice	Guyana People's Congress	Unit One Architects
Hornsey Lane/Colwick Close Residents Association	Hornsey CAAC	The Mulberry Primary School	Grace Baptist Chapel
Hornsey Moravian Church	Hornsey Dental Practice	The Planning Inspectorate	Kush Housing Association
Hornsey Mosque	Hornsey Housing Trust	The Ramblers	L & P Consultants
Hornsey Police Station	Hornsey Lane & Colwick Close RA	The Theatres Trust	Ladybur Housing Co-operativr
Hornsey School for Girls	Hornsey Lane Association	<a href="mailto:bryn.lockwood@sustrans.org.uk">bryn.lockwood@sustrans.org.uk</a>	Lancaster Road Residents Association
Hornsey YMCA	Hornsey Lane/Colwick Close Residents Association	Tiverton Primary School	LB Barking & Dagenham

## Appendix B Alterations to Strategic Policies Consultation Report.

Housing 21	Hornsey Moravian Church	Tottenham CAAC Tottenham Civic Society + Tottenham CAAC	LB Brent
HPN Ltd HTBG Residents Association IBI Design Associates Industrial Dwellings Society Inland Waterways Association	Hornsey Mosque Hornsey Police Station Hornsey School for Girls Hornsey YMCA Housing 21	Transport For London Tree Trust for Haringey Triangle Community Centre Turley Associates Campaign to Protect Rural England (CPRE) Young Lesbian Group Turnaround Publisher Services Turnaround Publisher Services	LB Croydon LB Ealing LB Hammersmith & Fulham LB Harrow LB Havering
Innisfree Housing Association Irish Community Centre Irish in Britain Representation Group Islamic Community Centre Islamic Community Centre Women's Group	HPN Ltd HTBG Residents Association St. Peter in Chains RC Infant School IBI Design Associates	Unite Group PLC Veolia Environmental Services (UK) Plc Wards Corner Community Coalition Warner Estate Residents Association	LB Kensington & Chelsea LB Lambeth Highways Agency LB Merton
JA Architecture Jack Cruickshank Architects Jacksons Lane Community Centre Jackson's Lane Residents Association James Place/Church Road Residents Association	Industrial Dwellings Society  Innisfree Housing Association Irish Community Centre Irish in Britain Representation Group	Haringey Citizen's Advice Bureau	LB Newham  LB Richmond Upon Thames LB Sutton LB Tower Hamlets
James Ross Architects Jason Read Pugh Jesus for the Word Community Project	Islamic Community Centre Islamic Community Centre Women's Group	West Green Residents' Association Woodlands Park Residents Association Haringey Trades Council Woodstock Road Residents Association	LB Wandsworth  Lea Valley Primary School League of Jewish Women LETEC
Jewish Orthodox Association	JA Architecture Jack Cruickshank Architects	Woodstock Road Residents Association	Levvel Ltd
John Grooms Housing Association	Jacksons Lane Community Centre Jackson's Lane Residents Association James Place/Church Road Residents Association	Workspace Group	Liberty Church
John L Sims Surveyor John Perrin & Co	James Ross Architects Jason Read Pugh Jesus for the Word Community Project	YMCA	Lidl UK Tamil Community Housing Association Ltd London & Quadrant
JS Surveying And Design Julian Cowie Architects Kings Avenue Dental Practice Kingsley Place Residents	Jewish Orthodox Association John Grooms Housing Association John L Sims Surveyor	Cabinda Community Association Veolia Water Partnership  London Parks and Gardens Trust Pinkham Way Alliance Thames Water Freehold Community Association	London & Quadrant London & Quadrant London and Quadrant British Waterways Board (London

Appendix B Alterations to Strategic Policies Consultation Report.

Association			Office)
Kurdish Advice Centre	John Perrin & Co	Natural England	Friends of Parkland Walk
Ladder Community Safety Partnership	JS Surveying And Design	Consultation Service	Friends of Woodside Park
Ladder Community Safety Partnership	Julian Cowie Architects	Office of the Green MEPs,	The Highgate Society
Lambert Smith Hampton	Sunlight Lofts Ltd	Habinteg Housing Association	LB Southwark
LB Bexley	Hornsey Historical Society	The John Loughborough School	Greek Community Care
LB Redbridge	Wise thoughts - gaywise	Haines Philip Architects	Turnpike Lane Citizens Advice Bureau
LB Waltham Forest Spatial Planning	Hornsey Vale Community Association	Hale Estate Residents Association	Greek Orthodox Church
Lee Valley Estates	Methodist Church	Hamilton Bishop Ltd.	Greek Parents Association
Lee valley Park Authority	Ministry of Justice	Youth One Stop Shop	Green City Landscapes Ltd
Lipton Plant Architects	Greater London Authority	Hancock Architects	Departments for Communities and Local Government
Living World Temple	Morrish Residents Association	Haringey African Organisation	Greig City Academy
Livingstone Youth & Parent Support Centre	Mount Anvil plc	Member of Parliament for Chipping Barnet	Gridline Architecture
Lomond Close & Brunswick Road RA	Haringey Allotments Forum	Planner	Lee Valley Regional Park Authority
Lomond Close Residents Association	Montagu Evans	One Housing Group	Martineau
London Ambulance Service	Newlon Housing Trust	One Housing Group	Milmead Industrial Management Ltd.
London Ambulance Service	Newlon Housing Trust	Hyde Housing	Mobile Operators Association
London Basement Company Ltd	CG Architects	Viridian Housing	Muswell Hill CAAC
London Bat Group	Tottenham Police Station	Wood Green Youth Club	Planning Potential
London Borough of Barnet	Wood Green Central Area Tenants & Community Assoc.	Notting Hill Housing Association	Uganda Welfare Association
London Borough of Camden	Methodist Homes	Nottinghill Housing Group	Shire Consulting
London Borough of Hackney	Network Housing	The Alexandra Surgery	Moselle Close Residents Association
London Borough of Islington	West Green Primary School	The Bowes Road Dental Practice	Transco
London City Airport	West Green Regeneration Group	The Chine & Cascade Residents Association	Trinity at Bowes Methodist Church
London Continental Railway	Westbury Dental Practice	The Christchurch Hall Surgery	Turkish Cypriot Counselling Group
London First	Westbury Medical Centre	Origin Housing	Turkish Cypriot Elderly Group
London Forum of Amenity & Civic Societies	Arhag HA	Haringey Area Youth Project	Mountview Arts Centre
London Historic Parks & Gardens	Mulalley and Company Ltd	Haringey Asian Women Aid	Grosvenor Road Residents
		Origin Housing	



## Appendix B Alterations to Strategic Policies Consultation Report.

Trust			Association
London Housing Federation	Haringey Irish Cultural & Community Centre	Origin Housing Group	Gus Alexander Architects
London Islamic Cultural Society	Lee Valley Estates	Pocket	Mt. Olivet Baptist Church
London Port Health Authority	Lee Valley Estates	Pocket Living	Murray Graham Architecture Ltd
London Walking Forum	Innisfree HA	Sahil Housing	Murray Mackeson Associates
London Waste Ltd	Karin Housing Association	Sanctuary Group	Muswell Colney Residents Association
London Wildlife Trust	Highgate CAAC	Sanctuary Housing	Muswell Hill & Highgate Handicapped Pensioners Club
London Windows Direct Ltd	Highgate CAAC	Shian Housing Association	Muswell Hill & Highgate Pensioners Action Group
Lord Morrison Community Centre	Apna Ghar Housing Association	Southgate Churches & Wood Green	Muswell Hill & Highgate Pensioners Action Group
Lordship Lane Infant School	Carr-Gomm	St Mungo	Muswell Hill FoE
Lordship Lane Junior School	Circle 33 Housing Trust	Teachers Housing Association	Muswell Hill Police Station
Loren Design Ltd	Community HT (One HG)	The Abbeyfield Society	Muswell Hill Synagogue
Love Lane Residents Association	Grainger PLC	Pinkham Way Alliance	Muswell Hill Youth Project
Lovell Partnerships Ltd	Guinness Trust	Muswell Hill Sustainability Group	N London Cultural Diversity Group
M C Dentistry	Habinteg Housing Association Ltd	S. Mary's Vicarage	N.A.G.
Manor House Dental Practice	Hornsey Housing Trust	Networked Neighbourhoods	National Romany Rights Association
Marianne Davys Architects Ltd	Housing 21	Cranley Gardens Residents' Association	Neelkamal Asian Cultural Centre
Mario Pilla Architects	Islington and Shoreditch HA	The Hawthorns RA and Neighbourhood Watch	Neil Wilson Architects
Markfield Project	Lien Viet Housing Association	Haringey Forum for Older People	Nelson Mandela Residents Association
MD Designs	Logic Homes Ltd	Woodside High School	Neo Architects
Metropolitan Development Consultancy	North London Business	LB Lewisham	New Deal for Communities
Metropolitan Home Ownership	North London Sub-Region	Barker Parry Town Planning Ltd	New Image Design
Metropolitan Housing Trust	Space Design Consultants Ltd	Lancasterian Primary School	New River Action Group
Metropolitan Police	LB Bromley	Haringey Autism	New River Sports Centre
Metropolitan Police Authority	St. Martin of Porres RC Primary School	Haringey Breastfeeding Centre	New Space
Metropolitan Police Service	Haringey Leaseholders Association	Exposure Organisation	Peacock & Smith for WM Morrison Supermarkets plc
Middle Lane Methodist Church	Haringey Mencap	Open Door	Peacock and Smith
Middlesex Area Probation Service	Turkish Cypriot Community	Noel Park Over 55's Club	New Stroud Green Health Centre

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Millennium Neighbourhood Watch & Residents Association	Association		
Millicent Fawcett Tenants Association	Iceni Projects Limited	North Grove Residents Association	Newton Architecture
Millyard 7th day Baptist Church	Mind In Haringey	North Harringay Infant & Junior School	NHS London
Ministry of Praise	Pellings Llp	North London West Indian Association	Nightingale Primary School
Missionaries of Africa	Oliver Burston Architects	Northumberland Park Community School	Noel Park Infant & Junior School
MJW	Highgate URC Church	Northumberland Park Tenants & Community Association	Noel Park North Area Residents Association
Moravian Church	Earlham Primary School	Northumberland Park Women's & Childrens Centre	Millennium Dental Practice
More Space	John Rowe-Parr Architects	npower	St. Paul's Catholic Primary School
Morris House Dental Surgery	The Garden History Society	Oakdale Resident Association / South Tottenham RA	Rokesly Junior School
Morris House Surgery	Westminster City Council	Okpanam Women's Association	Tynemouth Area Residents' Association
Nathaniel Lichfields and Partners	Wood Lane Residents Association	Oromo Community in Haringey	Papa Architects Ltd
National Federation of Gypsy Liaison Groups	Gardens Residents Association (GRA)	Osel Architecture	Friern Village Residents' Association
National Market Traders' Federation	Royal Borough of Kingston upon Thames	Haringey Carers Centre	Enfield, Haringey and Barnet Samaritans
Natural England	St. John the Baptist Greek Church	Haringey Community Volunteer	Dixon Searle LLP
New Testament Church of God	Haringey Pakistan Cultural Society	Haringey Faith Forum	PEEC Family Centre
NHS London	Haringey Phoenix Group	The Clock Tower Practice	Planning Perspectives
NHS London Healthy Urban Development Unit	Haringey Refugee Consortium	Haringey Ghanaian Community	PTEA
Noel Park CAAC	Weston Park Primary School	Woodberry Down Baptist Church	Turkish Cypriot Forum
Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park	Haringey Solidarity Group	Harmony Close Residents Association	Rapleys
North London Business	Wood Green Community Link	HART Architecture	Umfreville Road Neighbourhood Watch
North London Chamber of Commerce	Haringey Sports Council	Health and Safety Executive	Redrow Homes (Eastern) Ltd
North London Partnership	Haringey United Church	High Cross Church	Restoration Community Project
	Haringey Young Carers Project	High Cross United Reformed Church	RPS Planning

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Consortium			
North London Waste Authority	North Middlesex Hospital	Highgate Group Practice	Sandlings Residents Association
Office of Government Commerce	Caldotec Ltd	Highgate Library Action Group	Savills
People's Christian Fellowship	Campsbourne School	Woodside Residents Association	Savills Planning
Perfect Fit Kitchen & Interiors Ltd	Parkside & Malvern Residents Association	Outline Building Limited	Highway Youth Club
Peter Brades Architects	LB Greenwich	P R P Architects	Universal Church of the Kingdom of God
Phoenix Group	Grovelands, Lemsford & Leabank Residents Assoc.	P. E. Ottery	Mario Pilla Architects Ltd
Plevna Crescent Residents Association	Muswell Hill Primary School	P.D. Associates	LB Merton
Police & Community Working Group	Family Mediation Service	Palace Gardens Association	Pathmeads
Port of London Authority	Sovereign Group Ltd	Palace Gates Residents Association	Patrick Hickey Design
Post Office	St. Francis de Sales	Palace View Residents Association	Paul Archer Design
Post Office Counters Ltd	Leads Design Partnership	Park Lane Close Residents Association	Paul Buxton Associates
Powergen plc	St. Aidan's VC Primary School	Park Road Dental Practice	Peabody Design Group
Pride of Ferry Lane	Keeping it Simple Training (KIS) Ltd	Park Road Pool	Peabody Trust
Propel Projects	Home Group	Park View Academy	The Bounds Green and District Residents Association
Protect Bruce Castle Area (PBCA)	The Parish of Wood Green	My Dental Care	Rapleys LLP
Pyramid Counselling Services	Ferry Lane Primary School	Park Vue Dental Practice	Savills
Quorum Associates	St. John Vianney School	Parsons Brinckerhoff Ltd	Mario Pilla Architects Ltd
Randall Shaw Billingham	Action for Kids Charitable Trust	Partridge Way Residents Association	Planning Bureau - McCarthy and Stone
Redemption Church of God	Muswell Hill Centre	St. Mary Community Centre	Dowset Road Residents Association.
Refugee Helpline	Coleridge Primary School	St. Mary's CE Infant School	Bridge Renewal Trust
Remington Road Residents Association	Stroud Green Primary School	St. Mary's CE Junior School	Winbourne Martin French (chartered surveyors).
Rennie & Partners	Barnet, Enfield and Haringey Mental Health Trust	St. Mary's Greek Orthodox Cathedral	Muswell Hill & Fortis Green CAAC
Resident Association	Our Lady of Muswell Hill Primary School	St. Mary's RC Infant & Junior School	Transition Crouch End
Rhodes Avenue Primary School	Torrington Park Residents Association	St. Michael's CE Primary School	Hornsey Historical Society member.
Richard S McCarthy Architect	The Willow Primary School	St. Paul the Apostle	MHFGA
Rie Nijo Architecture	Sophia House Residents Association	St. Paul's	CgMs Consulting

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Risley Avenue Infant & Junior School Robert Burns Residents Association	South Harringay Infant School South Harringay Junior School South Hornsey Residents Association	St. Paul's and All Hallows CE Infant School St. Paul's Church	London borough of Enfield
Robert Harrison Property	Southwood Lane Residents Association	St. Peter Le Poer	Collins & Coward
Rolfe Judd Planning Ltd Royal Mail Property Holdings Royal Society for the Protection of Birds RSPB	Spenser Associates Sport England London Region Sporting & Education Solution Springfield Avenue Residents Association	St. Philip's St. Philips Church	Hornsey Historical Society member A2 Dominion Group
Rutland House Surgery Saheli Asian Girls & Young Womens Group Sakumoh Dance Group Sanctuary Housing Association Sanctuary Youth Club Save Britain's Heritage Save the Environment of Park & Palace (STEPP) Savills (L & P) Ltd for Tottenham Hotspur Football Club Savills Plc	St. Paul's and All Hallows CE Junior School St. Andrews Vicarage St. Ann's Primary School St. Anns Church St. Benet Fink St. Cuthbert's Church St. Francis de Sales RC Infant & Junior School St. Gildas' RC Junior School	St. Philips Youth Club St. Thomas More School St. Vincent Social & Economic Association Stagecoach - SELKENT Stamford Hill Primary School Stationers Community Centre Staunton Group Practice Stephen Donald Architects	The Highgate Society Greater London Authority Urban Vision Partnership Limited Regulatory Services Spur Road Surgery The Surgery St John's Road Surgery Myddleton Road Surgery The Tree Council
Scenario Architecture Schamroth + Harriss Architects Selby Trust	St. Ignatuis RC Primary School St. James CE Primary School St. James Dental Surgery	Stokley Court Residents Association Stroud Green Baptist Church Stroud Green Housing Co-operative	The Tree Trust for Haringey The United Reformed Church The Victorian Society The Weymarks Residents Association
Servite Houses Seven Sisters Infant & Junior School Seventh Day Adventist Church Seymour Road Residents Association SGI Sokagakkia	St. John the Baptist Greek Church St. John Vianney Church Hollickwood Park Campaign St. John's St. Marks Methodist Church	Stroud Green Residents Association STS Structural Engineering Stuart Crescent Health Centre Highgate Newton Community Centre Stuart Henley & Partners Studio 11 Design Ltd Studio 136 Architects Suffolk Road Residents' Association Summersby Road Residents Association	Three Valleys Water Tibbalds TM2 Tiverton Tewkesbury Residents Association Tomlinson Tree Surgeons Hill Homes Tottenham & Wood Green Pensioners Group Tottenham Baptist Church
Shian Housing Association Ltd Sierra Leone Community Empowerment Project	Van Rooyen Design Veryan Court Residents Association	Highgate Primary School	Tottenham Community Sports Centre Tottenham Green Sports Centre

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Sierra Leone Family Welfare Association	Victim Support Haringey	Sunshine Garden Centre	Tottenham Green Taskforce Hillcrest Tenants & Residents Association
Sigma Design Build UK Simon Bocking Building Services Simon Levy Associates	Holly Park Clinic Visit London Vivendi Architects LLP	Sure Youth Foundation Project Symon Smith & Partners T.B.F.H.A	Tottenham Irish Women's Group Tottenham Peoples Initiative
Society for the Protection of Ancient Buildings (SPAB) Solon Housing Co-operative Housing Services	Voluntary Action Haringey W. A. Shersby Warham Road Neighbourhood Watch	Tasou Associates Temple of Refuge	Tottenham Police Station Tottenham Traders Association
Somali Community Group	Charalambous Architectural Consultant	Templeton Associates	Tottenham Trust
Somali Welfare Association Somerset Gardens Family Health Care	Welbourne Community Centre	Tenants Association	Tottenham Women's Aid
St. James Church St. Mary's Church Stapleton Hall Ltd Stewart Ross Association/Dev Plan	Welbourne Primary School West Green Baptist Church West Green Neighbourhood Watch Holmes Design Ltd Holmesdale Road & Orchard Road Neighbourhood Watch Holy Innocents Holy Trinity Church	Tetherdown Primary School Thames Gateway London Partnership Highgate United Synagogue Highgate Wood School Highpoint Dental Surgery	Tower Gardens CAAC Tower Gardens Residents Network Town & Country Planning Limited Trafalgar Christian Centre Hillside Road Residents Group
Stock Woolstencroft Stonewall Sustrans	Home Craft Consultant	Tetlow King Planning Thames Water Utilities Ltd Thames Water Wastewater Services	Hilltop House Residents Association HM Prison Service Kings Avenue Dental Practice Kingsley Place Residents Association
Tan Dental Practice The Queens Mansions Residents Association	Homebase Ltd Homebound Social & Luncheon Group Homes & Community Agency Wilson & Bell	The Alexandra Residents Association	Kurdish Advice Centre
Tottenham CAAC Union Railways (North) Limited Whittington Hospital Trust Zairian & Congolese Community Association	Haringey Women's Aid	Haringey Council The Gypsy Council Hartleys Projects Ltd 8 Stuart Crescent Health Centre, Woodridings Court Residents Association	Kurdish Community Centre Kurdish Housing Association Turkish Youth Association Rookfield Estate Residents Association Turner Avenue Residents Association
Zatkhon Construction Co. Ltd. Willoughby Road Methodist Church Turkish Parents Association	Winkfield Road Community Centre Wood Green Police Station LB Enfield	Youth Theatre Project The Green CE Primary School Network Rail	United Apostolic Faith Church

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**Appendix F – Individual Comments Received to the Schedule of Proposed Alterations to the Strategic Policies DPD and the Council’s Response to Each**

Respondent ID	Comment ID	Topic	Summary of Response	Policy Ref	Council Response
346	1	Definition of affordable housing	There seems to be considerable confusion in the four different documents and in different sections within documents about the meaning, and different sorts, of affordable housing and the proportion or number of the different sorts required. The expression “Intermediate affordability” is used at one point without any explanation. The figures are too confused to form the basis for proper consultation.	General comment	The definition of affordable housing, including affordable rent, social rent and intermediate housing, and its delivery/funding mechanism, is set out in national policy. <b>The definition of affordable housing in Appendix 5 of the Strategic Policies DPD will be amended to reflect that provided in national policy (See Alt105).</b> A review will be undertaken of all four local plan documents to ensure definitions are consistent.
418	2	Consultation material	Sport England has no specific comments to make on the Alterations to the Strategic Policies (DPD). It is not obvious that the proposed changes relate to any sporting matters, however it is suggested that for future consultations that the Council issue a full mark-up of the document so that that proposed changes can be seen in context. This will aid clarify and allow commenters to understand the implications of the alternations on the surrounding text or policy.	General comment	A tracked changes version of the amended chapters was included alongside the Schedule of proposed amendments. However, it was not considered necessary or cost effective to provide a full marked-up version of the whole document. Further, as it is only the changes in the schedule that are subject to consultation and comment, it was felt that it might be misleading to respondents to publish the whole document, when over 99% of the document was outside the scope of the consultation. <b>No change</b>
813	3	Spatial strategy and strategic	It is understood that this is a partial review, and for that reason comments on the existing policy will not be accepted. But the proposed	General comment	As set out in the introduction to the proposed alterations (see paragraphs 1.3.1 – 1.3.3), a partial review was considered appropriate as

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		policies	changes are extremely important and far reaching, anticipating a vast increase in population, housing and other infrastructure. It may be that the changes are great enough to merit a whole-scale review and that to limit responses in this way is to rule out possibly better decisions for the future of the borough.		the local plan strategic policies had only recently been adopted; even with the uplift in the housing requirement, the spatial strategy advocated within remains the most appropriate when considered against all reasonable alternatives; and the extant strategic policies remain consistent with national and regional policy. <b>No change</b>
818	4	FALP	The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP.	General comment	Correct. <b>No change</b>
818	5	Maps	Need for individual maps that show clearly the exact boundaries of each area, with street names.	General comment	Noted. <b>Council has commissioned desktop publishers to assist in providing better maps a graphics throughout all four Local Plan documents currently being prepared.</b>
262	6	Opportunity Area designation	We support the proposed alteration which suggests that the Council are committed to consider Wood Green as an opportunity area. Opportunity areas are considered to contain brownfield land with a significant capacity for new housing, commercial and other development linked to existing and potential improvements to public transport accessibility.	Alt6	The support for an Opportunity Area designation for Wood Green is noted and welcomed. The Council would also welcome continued engagement by the community on the future of Wood Green as we embark on preparing an Area Action Plan to help realise the potential of the area. <b>No change.</b>
265	7	Housing targets	General support given for increasing housing targets in line with Further Alterations to the London Plan	Alt6	Support for increasing the housing targets in line with the London Plan 2015 is noted. <b>No change.</b>
421	8	Housing targets	It is noted that there is expected to be a significant uplift in the delivery of new homes in the Borough's growth points, such as Upper Lea Valley and Tottenham Hale. However it is	Alt6	The quantum of growth to be accommodated in Haringey is dictated by the NPPF requirement that Borough's meet their objectively assessed needs for housing and

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			<p>not clear what evidence has been used to support the expected uplift in new build within these areas. For example and as stated in our response letter (dated 9th March 2015) to the draft Tottenham Area Action Plan (AAP), the Tottenham area contains a rich historic environment with many designated assets. This includes nine conservation areas and numerous listed and locally listed buildings, plus a rich and interesting character which collectively should be used to inform the capacity of the area to accommodate the proposed quantum in development. By demonstrating that this approach has been undertaken, then clarity can be provided on the expected delivery of units in the growth points that reflect the principles of sustainable development as set out in the NPPF (paragraphs 7 to 10).</p>		<p>other land uses. In London, it is the role of the London Plan to reconcile housing needs and land availability. The London Plan 2015 establishes Haringey's contribution to London's housing supply as 1,502 homes per annum. The key evidence for the London Plan is the Pan-London SHLAA 2013. The methodology allowed for the exclusion of a site if it included a Listed Building (but only where development or intensification around the site/building was unlikely) but other heritage considerations were not even treated as constraints to a site's potential for development. The adoption of the Haringey Strategic Policies in 2013 established that the existing spatial strategy is the most appropriate and sustainable in the local context, having regard to a much wider range of considerations than just an area's heritage and character. None of the additional evidence base studies subsequently undertaken (Urban Character Analysis, Revised Infrastructure Needs Assessment, Open Spaces &amp; Biodiversity Study, ELR, Retail Assessment, SFRA Level 2, Viability Study, and Building) have lead the Council to conclude that the spatial strategy is not still the most appropriate and sustainable with the expected uplift in new build. It should also be noted that the Council has also not received any robust evidence to date to contradict this position. <b>No change</b></p>
818	9	Housing target	This is highly questionable. An 83% increase in	Alt 6	The growth areas were identified in the 2013



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			housing target implies a scale of development that will significantly affect the physical and social character of many areas of the Borough, mostly East of the rail line. Such a scale of development, if realized, would contradict and endanger many of the aspirations, objectives and policies set out in the Local Plan, e.g. on social infrastructure, reduction of inequality, environmental sustainability etc...		Strategic Policies DPD as areas that can accommodate growth & change and have the capacity to do so. Growth areas will be subject to significant inward investment delivering new jobs, better transports links, and new and improved social infrastructure. As a percentage of land area, growth areas represent a relatively small portion of the borough, the vast majority of existing communities will not be subject to significant change and local planning policies are in place to preserve existing character, especially that of value to the local community. <b>No change</b>
818	10	Housing target	We strongly challenge this massive increase.	Alt 6	The objection to Haringey's new strategic housing requirement is noted but it is outside the scope of the Haringey Local Plan to revise this figure down. The only mechanism for challenging this figure was through the further alterations to the London Plan in 2014. <b>No change</b>
259	11	Affordable housing	Shortfall of affordable housing of 11,757 across the Borough. These plans contain a great deal of upheaval for social housing tenants and it is vital that Council can deliver with real social justice and ensuring that housing is genuinely affordable to those most in need. This is one example of not just what is planned but, why and how, things are done that will matter.	Alt7	The Plan is about addressing current socio-economic and environmental issues associated with a number of specific areas or estates. Across the Plan it is about significantly increasing housing supply, including affordable housing, to meet local housing needs. <b>No change</b>
408	12	Query figures	Please explain why ONS claim migrant workers have reduced when it was claimed by the BBC news that Tottenham has the highest number of migrants in the UK	Alt 7, Para 1.3.1	The ONS data is based on the most recent census data, and is therefore considered by the Council to be the most robust and accurate. It is not for the Council to explain

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					why the BBC statement differs from ONS data. The Council would suggest this query is better directed to the BBC to respond. <b>No change.</b>
694	13	Housing Zone	Strongly support the inclusion of Tottenham Hale as a Housing Zone and its inclusion as a Strategic Policy. Suggest that projected jobs figures are included.	Alt9	Support for the Housing Zone designation for the Hale is noted. <b>The Council agrees that paragraph 1.3.11 (Alt 9) should be further updated to include the projected job figures for the Hale Housing Zone.</b>
259	14	Employment	Forecasts population increases in many neighbourhoods. 22,000 extra homes also 22,000 jobs. To make sure that local people are ready for these jobs we need an active third sector with resources and places from which to operate.	Alt12- 17	The Council agrees and seeks to work more closely with third sector agencies active across the borough to assist in delivering the Council's Strategic Objectives with regard to skills and training. Within this context, the role of the Local Plan and planning is to promote co-location of third sector agencies in new, mainly public, community development (i.e. through the Site Allocations) and seek to secure delivery through the planning application process. <b>No change.</b>
408	15	Wording suggestion	Replace 'will benefit' with 'it's assumed it will benefit'	Alt 14, 1.3 Para 1.3.27	The Council is content that the Tottenham area 'will benefit' from delivery of the priorities set out in the AAP. <b>No change.</b>
408	16	Word correction	'Harringay' ward not Haringey borough	Alt 18, 1.3, Para 1.3.18	The wording is correct as the proceeding term used is 'wards'. <b>No change.</b>
415	17	Transport	The proposed station at Alexandra Alt20 Palace is expected to open in 2030.	Alt20	The correction to the date for the proposed station at Alexandra Palace is noted. <b>The Council has amended the alteration to replace the date 2026 with 2030.</b>
265	18	Housing target	In light of the significantly increased housing target these representations are in general support of this strategy as additional land, both in the form of identified sites and as	Alt21	The Council notes the support for increasing the supply in land sufficient to meet both Haringey's objectively assessed need and the strategic housing requirement of the London

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			small windfall sites, will be required to be developed for housing during the plan period to meet this local need. This approach accords with the NPPF's presumption in favour of sustainable development and its requirement to boost significantly the supply of land for housing, as well as prioritising the redevelopment of brownfield land to meet these objectives, where possible.		Plan 2015. <b>No change.</b>
375	19	Spatial distribution	The Council had originally identified the west of the borough to be unsuitable for major development. This amended draft describes the 'suburban brownfield' development opportunities that have now come forward. The policy does not make it clear which of the new sites are included in this policy description.	Alt 21	The sites being considered are set out in the draft Site Allocations DPD. Within the west of the borough (the Muswell Hill Area Neighbourhood) 11 sites are proposed for allocation, providing a total of only 521 net new residential dwellings over the plan period to 2026. This equates to approximately 2.6% of Haringey's strategic housing requirement, and therefore the Council considers that this represents only a 'modest' level of growth in this context. <b>No change.</b>
375	20	Site selection	Suggest that Hillcrest is not a brownfield site and its development as an infill site would mean loss of valued green space and amenity space, and have a negative impact on appearance and character of estate.	Alt 21 SA47	Brownfield sites refers to sites that are currently occupied by development, had previously been used or developed, or that are not currently fully in use. It excludes designated open spaces, semi-natural environments and private gardens. The land within the Hillcrest estate allocation, identified as having potential for further development, is land that is not designated open space or forms private garden space. It remains the Council's view that the vast majority of the site, expressly excluding SINC land at and around the boundary, falls within

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					the definition of brownfield land. <b>No change.</b>
421	21	Spatial distribution	We note that the proposed alteration suggest a reference to the provision of 'modest growth' on a 'limited number of brownfield regeneration infill sites'. However it is not clear what evidence has been collected to support this change in policy. For example sites are being considered and what is meant by 'modest' growth?	Alt21 Para 1.3.61	The sites being considered are set out in the draft Site Allocations DPD. Within the Muswell Hill Area Neighbourhood 11 sites are proposed for allocation, providing only a total of 521 net new residential dwellings over the plan period. This equates to approximately 2.6% of Haringey's strategic housing requirement, and therefore the Council considers that this represents only a 'modest' level of growth in this context. <b>No change.</b>
818	22	Housing; affordable housing	11,757 homes over the plan period. As a proportion of the total net housing requirement for all tenures (20,172), this equates to 59%. At an annual rate, this is 784 affordable homes out of 1,345.	Alt25	The need for affordable housing is only one factor to be taken into account in setting an affordable housing target for the Borough. Other factors include the size of affordable housing needed and the ability of the RSLs and the development industry to afford this level of provision. Nevertheless, the more total housing delivered in the borough (i.e. above housing need), the more affordable housing that will also be delivered to help address the affordable housing need. <b>No change</b>
408	23	Employment	Does the actual rate of job growth, if any, correlate with the projected growth?	Alt 26, 1.4, Para 1.4.12	Yes, past and current trends are an important factor taken into account in preparing the projections, particularly, which employment sectors have/are growing and which have been or are in decline. <b>No change.</b>
265	24	Housing targets	General support given for increasing housing targets in line with Further Alterations to the London Plan	Alt27	Support for increasing the housing targets in line with the London Plan 2015 is noted. <b>No change.</b>
818	25	Housing target	The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the	Alt27	It is the role of the London Plan to reconcile housing needs with land supply across the capital. The strategic housing requirement

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			<p>GLA SHLAA - an 83% increase. This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The distribution of targets across London Boroughs displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly context and oppose this massive increase affecting the Borough of Haringey. These figures are unsustainable, unrealistic and unfair.</p>		<p>figure from the London Plan 2015 for Haringey is based broadly on the SHLAA, the methodology of which was agreed by all 33 boroughs. The opportunity to challenge Haringey’s strategic housing requirement was through the Further Alterations to the London Plan in 2014. However, it should be noted that, even if the figure was less than 1,502 per annum, the Council retains the requirement to meet its objectively assessed housing need, which is 1,345 homes per annum. The Council is currently in the process of revising its Infrastructure Delivery Plan, to ensure the infrastructure required to support both existing and new populations is identified and planned for. <b>No change.</b></p>
262	26	Housing targets	<p>We support the Borough’s desire to increase the capacity to deliver approximately 22,000 homes between 2011 and 2026, rather than the previous proposal of 13,000. The proposal to increase the number of homes ensures that the proposed alterations to the strategic policies accords with minimum housing targets outlined in the London Plan (March 2015).</p>	Alt28	<p>Support is noted. <b>No change</b></p>
259	27	Growth areas	<p>Page 16 Lists <b>growth areas</b> – what ethics are involved in choosing these areas as “most suitable”?</p>	Alt30	<p>These are areas within the Borough that can accommodate change and have the development capacity to do so (see paragraphs 3.1.6 – 3.19). This follows detailed assessments of land use, character, site availability, current and planned strategic</p>

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					transport capacity, development viability, and economic and environmental appraisal. <b>No change</b>
259	28	Community	What (Page 17) is the nature of the links to and benefits for ....communities?	Alt30	Growth Areas will be subject to significant inward investment delivering new jobs, better transports links, and new and improved social infrastructure. Existing communities in areas surrounding growth areas should also have access to and benefit from these facilities and the opportunities created. It should be noted that this statement is as adopted in 2013. <b>No change</b>
259	29	Infrastructure to match growth	The latest version of the Community Infrastructure Study 2010 is therefore likely out of date, not least in the light of the events of 2011. The Study needs updating for these new plans to reflect the increase in housing proposed under the Housing Zone. The study estimates that there are 1700 active Third Sector Organisations in Haringey but there is little integration of this potential in these new plans.	Alt30	The Infrastructure Delivery Plan is a 'live' document and requires regular updating. A refreshed version is published alongside the Regulation 19 consultation on the local plan documents. With respect to integration of the Third Sector, the Council is proposing to prepare a Third Sector strategy to effectively engage these organisations. <b>No change</b>
262	30	Growth areas	We support the inclusion of Wood Green Metropolitan Town Centre as a growth area where development should be promoted. However there should be sufficient flexibility to ensure optimised schemes are brought forward by developers.	Alt30	The support for Wood Green as a growth area is noted. The Council considers that sites should be optimised but in the context of meeting the strategic needs of the area and the borough, which requires prescription to ensure delivery and is the role of the Local Plan to set out. The Council will however be bringing forward an Area Action Plan for Wood Green to amplify the spatial development needs of Wood Green, and the Council would encourage all key stakeholders

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					to continue to engage in developing further the blueprint for Wood Green's future. <b>No change</b>
265	31	Housing targets	General support given for increasing housing targets in line with Further Alterations to the London Plan	Alt30	Noted and support is welcomed. <b>No change</b>
265	32	Spatial distribution	<p>In accordance with Alt21 a minor amendment is suggested to the last paragraph of SP1: Managing Growth to reflect that modest housing growth will take place within areas such as Muswell Hill Area Neighbourhood, including Highgate, which was previously identified as an Area of Limited Change. The alteration will also make Policy SP1 sound and in accordance with the overall content of the draft Alterations:</p> <p><i>"SP1: Managing Growth</i></p> <p>...</p> <p><i>Parts of the borough outside of the Growth Areas and Areas of Change will experience some development and change <b>in contributing towards meeting the local development needs, including providing for new homes.</b> The Council will ensure that development in these Areas of <del>Limited</del> <b>Moderate</b> Change will respect the character of its surroundings and provide environmental improvements and services."</i></p>	Alt30	<p><b>The suggested changes are agreed in part.</b> The Council agrees that development outside of Growth Areas and Areas of Change will make an important contribution to help meet local development needs and this fact should be recognised in the Policy. However, the Council does not consider it necessary to amend the term 'Areas of Limited Change' within the Policy, rather the preference of the Council would be to amend the description of 'Areas of Limited Change' at Paragraph 3.1.8, to recognise the identification of strategic Brownfield sites within the Local Plan allocations. A further modification to this effect is therefore set out and the end of the Schedule (<b>see Alt 102</b>).</p>
408	33	Wording suggestion	Replace 'meet' with 'aim to achieve' and insert the word 'target' in the phrase 'strategic housing [target] requirement	Alt30	The terminology throughout National Planning Policy and Guidance is that Council's have to <u>meet</u> their objectively assessed needs. Therefore, the Council does not consider the suggested change appropriate. The term

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					'strategic housing requirement' is also the correct terminology. <b>No change</b>
567	34	Housing targets & spatial distribution	The current increase in population in Tottenham is already unmanageable. Tottenham is already far more densely populated than the west of Haringey Borough. Why would Haringey Council agree to make this disparity even worse and then even worse again by adding an additional 10,000 homes? The London Plan does not that dictate that these additional 10,000 homes have to be located in Tottenham rather than the rest of the borough. This is not just as it will lead to an unfair burden on the infrastructure and to social stress and unrest. We believe Tottenham lives matter.	Alt30	Under the current spatial strategy adopted in 2013, Tottenham is to contribute 5,120 new homes. This equates to 64% of the Borough's growth. Wood Green delivers 21% and the rest of the borough 15%. With the uplift in Haringey's strategic housing requirement, Tottenham's contribution reduces to 50% of the Borough's growth. Haringey Heartlands/Wood Green increases to 23% (4,600 homes) and the rest of the borough increases to 27% (5,200 homes). The location of new housing growth reflects the investment being made in strategic transport and the availability of land/sites for redevelopment. The Site Allocations DPD does identify potential strategic Brownfield development sites in the west of the borough, however opportunities are limited and accessibility is generally poor with little prospect for significant improvement. On this basis, the Council is content that the spatial strategy, even with the housing uplift, is still the most sustainable and appropriate strategy to manage Haringey's growth needs. <b>No change</b>
567	35	Infrastructure	Schools are over-subscribed; transport is grossly overcrowded; primary health care provision is so insufficient that patients are having to use A & E, etc.; It is irresponsible to the people of Tottenham to increase the population to such an extent with no	Alt30	Significant investment has and is being made to further improve transport in Tottenham and the Council is working with its key service providers to address both the deficiencies in existing provision for schools and healthcare and to future proof these to accommodate



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			corresponding infrastructure in place. Promises from the mayor to do something when it gets bad enough, is not good enough.		the growth planned. <b>No change</b>
567	36	Contradictory statement	On Page 24, (10.2.4) of the SA of the Site Allocations DPD, it states, 'Over the plan period (2011-2026) this creates an overall target of 19,802 net additional dwellings in Haringey. The Tottenham AAP will accommodate 10,000 of these dwellings and so there is a need to deliver 9,802 dwellings in the rest of the borough. This statement contradicts the intention now to concentrate all this development in Tottenham and Wood Green.	Alt30	19,802 is the borough-wide overall target of net new home to be delivered between 2011 and 2026. Of this 19,802, Tottenham's contribution is just over 50% at 10,000 net new homes. Wood Green's contribution is 23% (4,600 new homes) and sites across the rest of the borough will provide for the final 27% (5,200 net new homes). As the vast bulk of new housing development (circa 75%) is directed to the growth areas within Wood Green and Tottenham, this statement in the SA is not considered contradictory or incorrect. <b>No change</b>
584	37	Housing target	Does not accord with the London Plan's requirement to identify the objectively assessed housing needs to seek to exceed the London Plan target. The London Plan Policy 3.3 requires that Boroughs should seek to achieve and exceed the minimum annual housing target as part of the LDF preparation. Furthermore, it requires Boroughs to draw on the housing benchmarks in developing their LDF housing targets, augmented where possible with extra housing capacity and to seek to enable additional development capacity, particularly brownfield housing capacity	Alt30	The Council has sought to meet the challenging new strategic housing requirement set for the Borough by the London Plan. The Council does not consider that rigorous re-appraisal of the SHLAA will render further capacity, given the reliance on probability within the study, rather than 'deliverability' as required to deliver a sound plan in accordance with paragraph 182 of the NPPF. The Council can confirm that the spatial strategy and site allocations of the Haringey Local Plan have taken account of the locations in London Plan Policy 3.3E(a-e) and that the local plan has identified strategic sites with development capacity for 20,040 new homes. With the addition of small sites and windfalls the Local Plan makes sufficient provision to

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					exceed its London Plan target, and therefore fully accords to the London Plan. <b>No change</b>
584	38	Consideration of RAs	We therefore consider that mixed use development in the Regeneration Area of the LEA is part of the overall requirement Haringey's housing requirements, as set out in Haringey's Strategic Policy SP1 and Table 3.1. We consider that this approach will contribute to effectively securing housing development to meet and exceed the housing requirements.	Alt30 & Alt32	Mixed use development within Regeneration Areas of the LEA should seek to optimise residential and non-residential outputs commensurate with infrastructure provision to support plan growth within the wider area. <b>No change</b>
608	39	Plan period	We welcome the revision to the Local Plan to reflect the new housing requirement for Haringey of 1,502 dwellings per annum (dpa). We assume that the plan period will be 2011-2036. It would be helpful if the revised plan made this very clear.	Alt30	The alterations do not represent a new Local Plan but rather an update to the recently adopted Strategic Policies DPD. The plan period has therefore not changed as a result of the alterations and continues to run from 2011 - 2026. The plan period continues to adequately cover and accommodate the strategic housing requirement period of the current London Plan. <b>No change</b>
608	40	Housing target	It is unclear what time-frame is being used that would generate a total strategic housing requirement for 19,800 dwellings. If the plan is intended to operate over the 15 year period 2011-2026 that would result in an overall strategic housing requirement for 22,530 dwellings (i.e. 1,502 x 15). Does this figure represent a residual figure once completions achieved since 2011 have been deducted? This should be clearly explained to avoid any doubt. If the Council does not intend to back-date the new strategic housing requirement to the	Alt30	Haringey's strategic housing requirement for the period 2010 – 2015 was 820 homes per annum. Local Plan periods do not have to align with London Plan housing requirement periods and often span more than one of these periods. Strategic housing requirements are not back-dated but change and run from the dates stated in the London Plan. The new strategic housing requirement figure of 1,502 for Haringey came into effect in the 2015/16 monitoring year. <b>No change.</b>

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			base year of 2011, the Council may wish to consider aligning its plan with the London Plan and prepare a plan that will operate over the ten year period 2015-2025.		
609	41	Growth areas	The amendment to Policy SP1 to include North Tottenham as a housing growth area is supported. Similarly the reference to the Tottenham High Road Corridor as Area of Change where the Council will promote development is supported. However it is considered that the boundaries of the Growth Areas and Areas of Change, as shown on Figure 3.1, should not be considered as the specific boundaries of these defined areas. Either the text or Figure 3.1 itself should make it clear that the areas shown are indicative and they do not represent finite boundaries.	Alt30	<b>Agreed in part.</b> The boundaries for the areas as shown in Figure 3.1 are indicative but are clearly defined within the Tottenham AAP for the Tottenham Growth Areas and Areas of Change and will be defined for Wood Green and Haringey Heartlands Growth Areas within the emerging Wood Green AAP. The extent of the Seven Sisters corridor is clearly defined as being 50 metres from the centre of Seven Sister's Road. <b>A footnote will be added to Map 3.1 (Alt 34) to the effect that the boundaries of Growth Areas and Areas of Change are indicative but will be further defined within the Tottenham and Wood Green area action plans that cover each of these areas.</b>
630	42	Spatial distribution	The local residents understand that you would like to build 19,800 new homes in Haringey. Why is it that 10,000 new homes will be built in a small area like Tottenham alone? Already a quarter of the homes in Tottenham homes are already over crowded with some houses having no double glazing and need repair.  The local people in Tottenham believe that, the Area Action Plan and draft local plan is unacceptable and should be withdrawn immediately. Instead the Council should work with the community to protect, support and	Alt30	The Council is required to plan for 19,800 new homes across Haringey over its plan period to meet its strategic housing needs and those of London. Tottenham was identified in the 2013 Strategic Policies DPD as an area that can accommodate growth & change and has the capacity to do so. New housing is required to meet local housing needs to address matters such as over-crowding. Without new housing provision, such issues will remain and are likely to worsen. <b>No change</b>

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			improve all the existing homes, estates, facilities and communities in the area as promised.		
633	43	Spatial distribution	To fit in an extra 11,100 homes would mean either unduly dense and tall development, conflicting with the historic character of the area and with biodiversity objectives; or it would mean sacrificing green space or employment land.	Alt30	Growth is intended to be focused on the Hale and North Tottenham. Designated employment land is to continue to be safeguarded or, where appropriate, renewed through mixed use development proving for more intense employment uses. Green spaces too are to be protected and enhanced. Where opportunities arise, additional open spaces will be created and new green links established. Tottenham's heritage assets and conservation areas will also continue to be protected and celebrated. One of the reasons for focusing growth on the Hale and North Tottenham is because these areas have very limited heritage assets. <b>No change</b>
633	44	Housing target	To arbitrarily change the target to more than double what was previously thought suitable suggests a disregard for what is realistic or consistent with previous objectives about preserving the character of the townscape	Alt30	The growth requirement is not an arbitrary figure but rather based on evidence of London's housing needs which we must plan for. Across London densities are increasing or are planned to increase to accommodate London's growth. The character of some areas will change, consistent with the London Plan density matrix. Such change follows centuries of change to London's townscape. However, growth areas represent a relatively small area of the borough, the vast majority of existing communities will not be subject to significant change and local planning policies are in place to preserve existing character, especially that of value to the local community. <b>No change</b>

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694	45	Housing target	Support the Council's aim to maximise and exceed its strategic housing target. Support the promotion of development in Growth Areas and Areas of Change, and the Council's recognition that development may come forward outside these identified areas. Berkeley Homes would support the promotion/ maximisation/ optimisation of delivery, to deliver the housing required.	Alt30	Support to meet Haringey's strategic housing requirement and to optimise the development potential of sites is noted. <b>No change</b>
694	46	Spatial distribution	Support the Council's recognition that sustainable development opportunity sites for development may lie outside designated town centres.	Alt30	The approach to development outside of Growth Areas and Areas of Change has not been subject to alterations and remains as adopted in 2013. However, the support for this approach is noted. <b>No change</b>
818	47	Housing density	Half of the strategic housing target should be located in Tottenham is not realistic and potentially highly damaging to the existing residents and businesses. Several wards of Tottenham already have the highest densities in the Borough. White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land and valuable housing estates – which means that the population density in the residential areas of those North Tottenham wards is high, too.	Alt30	The distribution of growth within the Local Plan reflects the agreed spatial strategy set out in the Strategic Policies DPD (2013), and is based on a wide range of sustainability criteria and evidence including land availability, transport infrastructure, planned investment in infrastructure, and urban character. The Council considers that adopted spatial strategy is still the most appropriate and sustainable even with the up lift in housing growth expected and is supported by the existing evidence base. <b>No change</b>
818	48	Spatial distribution	The proposal to concentrate half of the housing delivery target (=10,000 homes) imposed on Haringey by the latest Alterations of the London Plan in Tottenham is not realistic and potentially highly damaging to	Alt30	Under the current spatial strategy adopted in 2013, Tottenham is to contribute 5,120 new homes. This equates to 64% of the Borough's growth. Wood Green delivers 21% and the rest of the borough 15%. With the uplift in

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			<p>the existing residents and businesses. We disagree with the fact that Tottenham should host half of this targeted growth. The target of 10,000 new homes in Tottenham is totally over-estimated.</p>		<p>Haringey’s strategic housing requirement, Tottenham’s contribution reduces to 50% of the Borough’s growth. Haringey Heartlands/Wood Green increases to 23% (4,600 homes) and the rest of the borough increases to 27% (5,200 homes). The location of new housing growth reflects the investment being made in strategic transport and the availability of land/sites for redevelopment. The Site Allocations DPD does identify potential strategic Brownfield development sites in the west of the borough, however opportunities are limited and accessibility is generally poor with little prospect for significant improvement. On this basis, the Council is content that the spatial strategy, even with the housing uplift, is still the most sustainable and appropriate strategy to manage Haringey’s growth needs. <b>No change</b></p>
584	49	Improved mapping	<p>In terms of Table 3.1, whilst we support the principle of identifying a broad capacity for housing in each of the Growth Area, we are concerned that the location and Figure 3.1 do not correspond. This is particularly relevant to our client’s interest, the Bittern Place site, as it is located in Wood Green Metropolitan Town Centre and in Haringey Heartland.</p>	Alt 31	<p>Noted, but within the Strategic Policies, it is correct to talk about broad locations for growth and it is not necessary to define these to the individual site level – other development plan documents will give further detail. <b>A footnote has been added to Map 3.1 (Alt 34) to the effect that the boundaries of Growth Areas and Areas of Change are indicative but will be further defined within the Tottenham and Wood Green area action plans that cover each of these areas.</b> It should be noted that the long-term aspiration, as signalled in the recent further alterations to</p>

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					the London Plan, is to see both the Haringey Heartlands and Wood Green areas be combined into one and designated an Opportunity Area to ensure the Borough can leverage strategic regional intervention to support the delivery of these areas. As also signalled in the revised Local Development Scheme (Feb 2015) the Council is proposing to develop an Area Action Plan for Wood Green to provide the more detailed policy framework required to bring about a more managed and structured delivery of this growth opportunity.
584	50	London Plan conformity	The identification of the capacity is not in line with the London Plan identifies an indicative capacity of 2,000 jobs, and a minimum of 1,000 new homes.	Alt 32	The figures within the London Plan are indicative and are minimums. Policy 2.13 C of the London Plan requires boroughs to develop more detailed policies and proposals for opportunity areas and intensification areas. In preparing the draft Site Allocations DPD the Council has identified further development capacity within the Haringey Heartlands/Wood Green area, which is reflected in the revised housing figure. This is based on development in accordance with the appropriate ranges within the London Plan density matrix. In line with the purpose of Opportunity & Intensification area designations, the Council will seek to optimise residential and non-residential outputs within these areas commensurate with infrastructure provision to support growth. <b>No change</b>
609	51	Housing target	As regards Table 3.1 it is considered that the reference to the number of units in the Areas	Alt32	<b>Agreed.</b> All housing figures in the Local Plan are minimum figures. <b>Amend Table 3.1 (Alt</b>

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			of Limited Change should be noted as being a minimum requirement. This is necessary as an acknowledgement of windfall sites outside the defined areas that may come forward for future residential development.		<b>32) to state that the housing figures therein are minimums.</b>
818	52	Infrastructure	How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in the Site Allocation DPD and Tottenham AAP	Alt32	The Council is in the process of updating its Infrastructure Delivery Plan (IDP) to take account of the new housing figure for the borough and the spatial distribution. The IDP will be published alongside the Regulation 19 version of the Local Plan documents. It is anticipated that the IDP will enable the site allocations to be more specific about the contribution strategic site will make towards delivering specific new infrastructure. <b>No change</b>
413	53	Spatial distribution	We note at page 35 that the Tottenham Hale Growth Area and the Northumberland Park and Tottenham High Road Corridor Areas of Change are located close to the Sites of Special Scientific Interest (SSSI) at Walthamstow Reservoirs and Marshes and the Lea Valley and we would advise that it would be advisable if new housing in Haringey is located away from the boundaries of the SSSIs. We would recommend project-level assessments to determine whether significant harm is caused to the SSSI interest features and that applicants speak to Natural England prior to submitting planning applications for proposed development near to the SSSIs in order to assess possible impacts. The National Planning Policy Framework (NPPF) outlines	Alt34 Figure 3.1: Growth Areas and Areas of Change	None of these areas are new growth areas in the plan, although the quantum of growth within each has changed to reflect further work undertaken on sites capacities. A Habitats Assessment has been undertaken as part of the preparation of the Local Plan and concludes that the uplift in housing for Tottenham, as provided for through these alterations to the Strategic Policies 2013, is unlikely to result in harm to strategically important habitats, should the mitigation measures proposed be implemented. However, it is appreciated that these are strategic documents and the supporting assessments are broad. <b>The Council therefore proposes to amend the site allocations for Tottenham Hale and North Tottenham to</b>



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			the importance of the protection of SSSIs and any proposed development not having adverse impacts on SSSIs at paragraph 118		<b>require site specific assessments be undertaken through the planning application process to assess potential impacts on the Sites of Special Scientific Interest (SSSI) at Walthamstow Reservoirs and Marshes and the Lea Valley, and that Natural England should be consulted as part of the assessment process.</b>
422	54	Correction / Update	Please note that in paragraph 3.1.15 there is a reference to PPS 25 which has now been withdrawn. This should be updated to refer to the current National Planning Practice Guide. We have no other comments to make on this document.	Para 3.1.15	A review of paragraph 3.1.15 has confirmed that the paragraph already refers to the NPPF and not PPS 25. <b>No change</b>
408	55	Sequential testing	How many developments has the sequential test ever stopped in their entirety?	Para 3.1.15	Whilst not part of the proposed alterations, the Council acknowledges that in the context of a built up urban environment, more often the exceptions test will be triggered. <b>No change</b>
408	56	Job growth figures for Tottenham	Where are these 1,500 jobs coming from?	Alt 37, 3.1, Para 3.1.11	4,000 jobs are planned for Tottenham Hale. New jobs will be delivered through the reconfiguration of the existing employment sites away from industrial & warehousing uses to more intensive employment / business uses, further growth in the retail and leisure provision, and increased community facilities. <b>Amend text to reflect jobs provision (Alt35)</b>
415	57	Transport	The gyratory work and new bus station have now been completed; this paragraph should therefore be amended to reflect this progress. Further to this, the station upgrade is now committed (at a cost of £32m) as is the West Anglia Main Lane upgrade from Angel Road to	Para 3.1.19	<b>Agreed. The factual updates regarding now completed transport works will be reflected in a new alteration (see Alt104) to the strategic policies.</b> The commitments to funding further improvement at the Hale will also be picked up within the Tottenham AAP.

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			Stratford.		
415	58	Transport	For the enhancement of Northumberland Park, the plan could reference the work between TfL, Haringey and the GLA to develop proposals for the White Hart Lane station.	Para 3.1.33	The representation is outside the scope of consultation on the alterations. <b>However, the Council will pick this up within the Tottenham AAP.</b>
408	59	Seven Sisters	References to St Ann’s Hospital are noted	Para3.1.40	Whilst outside of the scope of the proposed alterations, this is noted. <b>No change</b>
259	60	Estate renewal	Page 20 uses the term “regenerate social housing estates” - does this term not need more definition?	Alt45	What is meant by estate renewal is set out in Alt53 & Alt64. No further definition is required. <b>No change</b>
375	61	Sustainable development	Sustainability of development is a key requirement of the NPFF and an aspiration for development. Suggest that the sentence “and are sustainable for current and future generations” be reinstated.	Alt45	Agreed. <b>A further amendment will be made to reinstate this sentence.</b>
562	62	Design excellence	I fully support the emphasis on excellence on design quality and would request mention of Haringey’s design panel to assist developers. To ensure input from the design panel we should state that the Council can insist, instruct that a development is referred to the design panel. Good design does not just relate to housing so the emphasis on good design should be included, where appropriate, so that it also refers to other types of development such as schools etc	Alt45	Unfortunately there is no statutory requirement that major, minor or contentious development requires scrutiny via a design panel. Rather it remains that the Council will continue to encourage proponents to bring developments for the review and comment of the design panel. The Development Management policy on design picks up the comment on design applying to all forms of development. <b>No change</b>
659	63	Affordable housing	CONTRIBUTE TO DECENT AND AFFORDABLE HOUSING FOR ALL: - Ensure that new developments provide the secure, and genuinely-affordable housing that people need, and that 'gentrification' doesn't force thousands of local residents out	Alt45	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. The definition of affordable housing includes both ‘affordable rent’ and ‘social rent’; however, it is only the former

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			<p>of our borough</p> <ul style="list-style-type: none"> <li>- All planning policies must ensure that there are adequate, genuinely affordable (for those on the lowest incomes) and long-term secure homes for all who need them, in contrast to current Council definitions and policies. At least 50% of all new homes should be genuinely affordable social rented housing. As a specific example, planning policies must support the residents of Love Lane Estate, and any other residents, threatened with possible relocation and demolition.</li> </ul>		<p>that can attract grant. While the Council can negotiate provision of 'social rent', the absence of grant and rents at up to 80% impacts significantly on viability and would result in significantly less affordable housing being secured. It is therefore a trade-off between the level of affordability and the amount of affordable housing to be secured. The Council's preference is to maximise the amount of affordable housing delivered and, in parallel, will work with its RSL partners to encourage them to set rent levels that reflect affordability in a Haringey context. With regard to estate renewal, the provision for existing Council tenants is to be outlined in the Council's Housing Strategy. <b>An amendment to reference this in proposed to Alt64.</b></p>
668	64	Equalities	<p>"The ability of local people to afford the new homes being built, especially in the east of the borough, is dependent on them accessing jobs and also increasing their incomes to a sufficient level to afford the new homes on offer as a result." (Equalities Impact Assessment on Haringey's housing policies, Cabinet, 17/03/15, p62).</p> <p>These shocking words should tell local councillors that it is time to stop and think again about the huge programme of housing demolitions and redevelopment in the Local Plan.</p> <p>The suggestion that Tottenham residents must compete against all-comers to secure</p>	Alt45	<p>The manufacturing industry across London and Haringey continues to decline. The Local Plan has to address this issue and does so by seeking to protect the best industrial locations for continued industrial use and seeks to re-orientate the remaining industrial land holdings to mixed use development providing for more intensive employment uses. These typically tend to be more skilled jobs and rightly, the Council wants local residents to be able to take these jobs up. Skills and training are therefore included in the Plan as part of the obligation on new mixed use developments of employment land.</p>

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			<p>'jobs in more highly-skilled sectors, such as sustainable technology, digital design and skilled / craft manufacturing' (p62) seems perplexing, when local people are facing cuts in youth services and Further Education opportunities, and when the regeneration plans include the elimination of local jobs at the Peacock and Brantwood Road industrial estates, and in community shops and businesses.</p> <p>Some people have health or disability issues, or other barriers to reaching the highly-paid work which will now be required. Housing is a human right, and it is unjust to deny decent homes to local people purely because they have low incomes.</p> <p>The Equalities Impact Assessment shows that Council renting and Housing Association renting at target rents are really-affordable in this borough, while the preferred regeneration tenures of low cost home ownership and so-called 'Affordable Rent' (meaning time-limited tenancies and near-market rents) are not affordable, especially on the average incomes in Tottenham.</p> <p>So when council housing is demolished, "affordable housing is not affordable".</p> <p>The Equalities Impact Assessment also states that the reliance in these plans on low-cost home ownership will adversely affect black people in particular (p62). Policies that disadvantage the poor will have an institutionally racist impact.</p>	<p>Affordable housing will continue to be sought on new housing development. While this will take the form of affordable rent and intermediate housing, the Council will work with its RSL partners to ensure rents are set at levels that are affordable in a Haringey context.</p> <p>Through its estate renewal, the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more family sized social housing. <b>No change</b></p>
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669	65	Housing target	The Woodgate Group fully supports the urgent need for more homes in Haringey and in particular Tottenham Hale and they can deliver more homes before 2018. The Haringey Local Plan Monitoring Report 2012/13 (published July 2014) indicates that for the monitoring year 2012/13 the number of net housing completions in the borough was 1,285. However, this included 492 non-conventional units at Hale Village. Only 583 net conventional units were completed in this period. It is evident that housing delivery will have to assume a significant step change in the borough.	Alt45	Support for housing delivery is noted. It is a Council priority to deliver a step change in housing delivery to meet needs and the Housing Zone designation for Tottenham Hale will help to accelerate delivery. However, the Council is also aware that there may be a lag between implementing the initiatives needed to achieve the 'step change' and seeing the fruits of this labour through increased completions as reported in the Authorities Monitoring Report. <b>No change</b>
818	66	Affordable housing	We support Haringey Council's statement in the Haringey Local Plan & the Annual Monitoring Report for council's planning policies that 'provision and access to high quality and affordable housing' is a key priority for our borough [Haringey Local Plan 3.2 SP2 Housing p. 61 & Annual Monitoring Report p. 41].	Alt45	Support is noted and <b>the text proposed for deletion at the Regulation 18 stage has been largely reinstated in Alt45.</b>
818	67	Estate renewal	we strongly challenge and question the approach to housing provision and to 'housing estate renewal' which permeates the Alterations to Strategic Policies, the Tottenham AAP, and a number of sites in the proposed SA DPD, in particular the following Council Housing estates: SA57 (Park View and Durnsford Road), SA63 (Broadwater Farm), SA66 (Leabank and Lemsford Close).	Alt45 & Alt53	Objection is noted. Amendments have been made to a number of the site allocations mentioned as a result of comments received to the Regulation 18 consultation. It is hoped that these, along with further amendments to Strategic Policy SP2, will have addressed some of the concerns raised.
825	68	Estate renewal	As a leaseholder I object to the redevelopment plans in Haringey.	Alt45	The objection is noted. <b>No change</b>

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265	69	Housing targets	General support given for increasing housing targets in line with Further Alterations to the London Plan	Alt46	Support is noted. <b>No change</b>
408	70	Targets – replace wording	Insert the word ‘target’ in the phrase ‘strategic housing [target] requirement	Alt46 & Alt56	The term ‘strategic housing requirement’ is the correct terminology as it refers to the minimum housing need to be met and not an upper target. <b>No change</b>
408	71	Targets – replace wording	Add the word ‘target’ to the many similarly worded phrases in this document	Alt 46	The term ‘strategic housing requirement’ is the correct terminology as it refers to the minimum housing need to be met and not an upper target. <b>No change</b>
824	72	Provision for older people	<p>Present housing policies and planning committee guidelines do not include the provision of suitable homes for downsizing (neither for rent or purchase) and there is little advice on offer. Also I could not find a reference to house adaptation for older people.</p> <p>Enabling older people to down-size may release properties suitable for families. It could lead to a more comfortable and healthy living environment and thus reduce hospitalisation.</p> <p>None of the amendments refer to the needs of older people, and none refer to co-housing projects that may solve the living alone problems common in the elderly.</p> <p>Identified relevant alterations are: 7, 23, 25, and 52. But none of these refer to age. In the Strategic Plan SP2, paragraph 3.2.2 could have included regard to the housing needs of older people.</p>	Alt46	The Strategic Policies DPD addresses more the broad quantum of development and growth to be managed across the borough over the plan period. The Development Management Policies DPD includes policies on housing mix and specialist needs housing, which includes housing for the elderly in line with the Council’s Housing Strategy. <b>No change</b>
375	73	Housing	The revised targets are unrealistic and likely to	Alt47	There is no reason to believe that the

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		targets	lead to poor quality development if pursued.		provision of higher density development will result in a poorer quality of development. Specific Development Management policies are included to ensure new development achieves a high quality finished product, including the public spaces around development. <b>No change</b>
608	74	Objectively assessed needs	<p>Some clarification is required here. The new London Plan has identified its <i>objectively assessed need</i> to be at least 49,000 dwellings per annum for the period 2015-2025 (equivalent to 49,000 per annum), but the figure of 49,000 is only the OAN if output is sustained at this rate until 2036. Over the shorter time-frame of 2015 to 2025 the OAN rises to 62,000 dpa.</p> <p>The London Plan has established a capacity-constrained <i>strategic housing requirement</i> for 420,000 dwellings for the period 2015-2025 as set out in Table 3.1 of the London Plan. This is equivalent to 42,000 per annum. This is explained in paragraph 3.16b of the London Plan.</p> <p>Haringey’s contribution to meeting London’s strategic housing requirement is to provide an annual average of 1,500 dwellings. We have rounded down the precise figures in all cases. It is therefore not strictly accurate to say that the London Plan has set a target for 490,000 dwellings for the period 2015-2025. It has only set a London-wide target for 42,000 dpa. It is acknowledged by the Mayor that in order to close the gap between the housing</p>	Alt47	<p>The Council has sought to meet the challenging new strategic housing requirement set for the Borough by the London Plan. The Council does not consider that rigorous re-appraisal of the SHLAA will render further capacity, given the reliance on probability within the study, rather than ‘deliverability’ as required to deliver a sound plan in accordance with paragraph 182 of the NPPF. The Council can confirm that the spatial strategy and site allocations of the Haringey Local Plan have taken account of the locations in London Plan Policy 3.3E(a-e) and that the local plan has identified strategic sites with development capacity for 20,040 new homes. With the addition of small sites and windfalls the Local Plan makes sufficient provision to exceed its London Plan target, and therefore fully accords to the London Plan. <b>No change</b></p>

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			requirement and the objectively assessed need of 49,000 dpa for the period 2015-2036 the London Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing targets set out in table 3.1 (see London Plan Policy 3.3 Increasing Housing Supply).		
633	75	Housing target	It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular the very high targets given to Haringey to create extra homes compared to the much lower rates of expansion given to west central and outer southeastern boroughs. Recommends reduction from 22,000 new homes over the plan period to 13,000.	Alt47	The objection to Haringey's new strategic housing requirement is noted but it is outside the scope of the Haringey Local Plan to revise this figure down. The only mechanism for challenging this figure was through the further alterations to the London Plan in 2014. The Site Allocations DPD and the Tottenham Area Action Plan identify sufficient sites with capacity to deliver in excess of our strategic housing requirement over the plan period of 19,802 net homes, noting that this is a minimum figure. The Council is also updating its Infrastructure Delivery Plan to ensure new development and growth is matched by provision of necessary infrastructure to support it. <b>No change</b>
657	76	Residential moorings	The Canal & River Trust wishes to object to this section of the Local Plan insofar that it does not address the significant demand for residential moorings within London. Given the demand for residential moorings in London we would have expected to see a policy promoting these on the River Lee Navigation.  Moorings add animation and activity to the waterways as well as providing passive	Alt47	It is the Councils understanding that the authority for increasing residential moorings lies with the Canal and River Trust. If promoting further moorings on the River Lee, the Council would encourage the Canal and River Trust to discuss this with the Lee Valley Regional Park Authority. While the Council is likely to support additional residential moorings, as a means of providing relatively cheaper living accommodation, such provision



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			surveillance of the waterways and towpath for all users. In the case of residential moorings, these can provide 24 hour surveillance.		would be treated as 'windfall' development, in regards to it contribution to Haringey's housing needs. The role of the LPA in respect of moorings is to ensure waterside development does not detract from waterways usage, including existing and increased provision of residential moorings. <b>No change</b>
659	77	Density	Over-high housing densities – do they undermine the need to ensure sustainable communities? Current social and environmental infrastructure is inadequate to deal with the needs of current population levels, let alone greater/denser population levels. People are entitled to good quality living space and access to gardens etc. Do we really want to see a return to the failed tower blocks & estates of the past?	Alt47	The densities proposed for development in the borough are within the acceptable ranges of the London Plan's density matrix. Planning policies are also being put in place to ensure new development delivers a high standard of design and quality. A key requirement of the Local Plan is to ensure growth is matched by provision of new and improved infrastructure to support both existing as well new the population. <b>No change</b>
694	78	Housing target	Support the Council's aim to maximise and exceed its strategic housing target.	Alt47	Support is noted and welcomed. <b>No change</b>
818	79	Housing target	This is an ex-post justification to comply with the FALP. We question the disproportionate burden of new housing construction which has been imposed on Haringey.	Alt47	The objection to Haringey's new strategic housing requirement is noted but it is outside the scope of the Haringey Local Plan to revise this figure down. The only mechanism for challenging this figure was through the further alterations to the London Plan in 2014. <b>No change</b>
268	80	Play space	The policy requires that new development 'complies with ....standards set out in ....the Mayor's Play and Informal Recreation SPG 2012'. Concerning external space, Haringey has particular issues concerning a deficiency of Open Space, documented in the Haringey	Alt48	Haringey's Open Space and Biodiversity Study (2015) shows that the borough has 9.49ha of play space provision. This equates to a current standard provision of 1.65m <sup>2</sup> per child. The Councils Open Space and Recreational Standards SPD, adopted in 2008 set a local

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			<p>Open Space and Biodiversity Study Final Report.</p> <p>The London Plan and Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG 2012, offers Boroughs the opportunity to insert locally agreed benchmarks for play space requirements that reflect boroughs' own specific circumstances (Shaping Neighbourhoods: Play and Informal Recreation SPG, para 4.24 page 57 and space calculator page 49).</p> <p>Recommendation: The Borough should consider developing locally appropriate standards for play space to reflect its local priorities, as recommended by the London Plan Shaping Neighbourhoods SPG para 4.24</p>		<p>standard of 3m<sup>2</sup> per child. The Mayor's Play Space standard is 10m<sup>2</sup> per child. The Council therefore considers the application of the Mayor's SPG standard to be a very ambitious target for the borough but one we should aspire to at least for all new development. It would be challenging to achieve a target above the Mayor's and would likely be views as making new development make good on an existing deficit as well as meeting their own needs, which would be unreasonable. <b>No change</b></p>
584	81	Mayors SPG	<p>Criterion 2 requires "compliance" with the housing design and space standards set out in the Mayor's Housing SPG (2012) and the London Plan, and the play space standards set out in the Mayor's Play and Informal Recreation SPG (2012). We object to this criterion as the SPGs and the Mayor's standards should be treated as a "guide" rather than a requirement. We consider that the criterion as currently drafted goes beyond the purpose of non-statutory guidance. We request that this should be amended as "is designed having regard to" rather than "complies".</p>	Alt48	<p>Agreed. <b>A further amendment to the Alt48 is proposed to reflect that the Mayor's standards are guidance.</b></p>
694	82	Amenity &	<p>Suggest that the London Plan and</p>	Alt48	<p>Noted. Site specific circumstances are a</p>

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		play space standards	accompanying SPG provide guidance. The provision of such spaces needs to be taken into consideration having regard to the particular site and its own constraints. The provision of on-site amenity and child play space, should be applied flexibly to relate to the individual circumstances of the site and proposed development.		material consideration to be taken into account in the applicability of any planning policy or development standard. However, where practicable to do so, development should seek to meet and exceed the minimum design standards of the plan. <b>No change</b>
694	83	NPPF consistency	This policy unsound, as it is not consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density, which is simply a calculation of the number of homes against the size of unit, but of the quality of the proposed development and the place it will create, in its context. An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space. Policy SP2 should be amended to reflect this. It should be noted that the Housing SPG is merely guidance and therefore any application will not need to be fully in line with this document.	Alt48	As set out in the policy, density is but one consideration of development quality. Good design is further elaborated on in the Development Management Policies DPD. Section 36 of the Town & Country Planning Act requires that all development be considered on its merits on a case-by-case basis and determined in accordance with the policies of the Local Plan unless material considerations indicate otherwise. <b>No change</b>
375	84	Affordable housing	Suggest maintaining target at 50% affordable housing and continue to negotiate viability across individual schemes.	Alt49	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. <b>No change</b>
527	85	Affordable housing	The 'proposed alterations to the strategic policies' document stipulates a reduction in the affordable housing expectations for the	Alt49	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not

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			<p>borough from 50% to 40%. We note that this 40% 'affordable' (i.e. at 80% market rate) target itself does not stipulate a requirement for any socially-rented housing as part of any future development proposals. The warehouse community grew from a lack of affordable space in London, with the majority of residents moving to the sites due to their relative affordability in comparison to the wider private-rented sector and rented creative/commercial spaces. Local authorities are the primary guardian of continuing affordable housing stock in the city. Haringey council should maintain its aspiration to achieve 50% affordable housing from any development and include a requirement for contributions to the borough's social housing stock from future development.</p> <p>Further to this point, we are extremely disappointed to note that Haringey's proposed plans suggest a reduction in the total socially-rented housing stock within the borough. This points to a Council disregard for its vital role in supporting genuinely affordable housing in the borough. Stock which allows low income households to continue to live here and which contributes to a vibrant, diverse community to the benefit of all its inhabitants.</p>		<p>support this. The definition of affordable housing includes both 'affordable rent' and 'social rent'; however, it is only the former that can attract grant. While the Council can negotiate provision of 'social rent', the absence of grant and rents at up to 80% impacts significantly on viability and would result in significantly less affordable housing being secured. It is therefore a trade-off between the level of affordability and the amount of affordable housing to be secured. The revised target of 40% is predicated on securing 'affordable rent'. If this was to be re-orientated to securing 'social rent', this target would need to be drastically reduced further. The plan does not propose a reduction in the total social rented housing stock. Where estate renewal, takes place, the total existing social rented floorspace will be replaced but the opportunity will be given to changing the housing mix, so that the new social rented housing might best meet current local housing needs (i.e. replacing 1 &amp; 2 bedroom social rented homes with 3 or 4+ social rented housing) This may result in a reduced amount of total social homes but should ensure the housing better meets the acute housing needs of the Borough. <b>No change.</b></p>
528	86	Affordable housing	The 'proposed alterations to the strategic policies' document stipulates a reduction in the affordable housing expectations for the borough from 50% to 40%. We note that this	Alt49	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. The definition of affordable

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			<p>40% 'affordable' (i.e. at 80% market rate) target itself does not stipulate a requirement for any socially-rented housing as part of any future development proposals. The warehouse community grew from a lack of affordable space in London, with the majority of residents moving to the sites due to their relative affordability in comparison to the wider private-rented sector and rented creative/commercial spaces. Local authorities are the primary guardian of continuing affordable housing stock in the city. Haringey council should maintain its aspiration to achieve 50% affordable housing from any development and include a requirement for contributions to the borough's social housing stock from future development.</p> <p>Further to this point, we are extremely disappointed to note that Haringey's proposed plans suggest a reduction in the total socially-rented housing stock within the borough. This points to a Council disregard for its vital role in supporting genuinely affordable housing in the borough. Stock which allows low income households to continue to live here and which contributes to a vibrant, diverse community to the benefit of all its inhabitants.</p>		<p>housing includes both 'affordable rent' and 'social rent'; however, it is only the former that can attract grant. While the Council can negotiate provision of 'social rent', the absence of grant and rents at up to 80% impacts significantly on viability and would result in significantly less affordable housing being secured. It is therefore a trade-off between the level of affordability and the amount of affordable housing to be secured. The revised target of 40% is predicated on securing 'affordable rent'. If this was to be re-orientated to securing 'social rent', this target would need to be drastically reduced further. The plan does not propose a reduction in the total social rented housing stock. Where estate renewal, takes place, the total existing social rented floorspace will be replaced but the opportunity will be given to changing the housing mix, so that the new social rented housing might best meet current local housing needs (i.e. replacing 1 &amp; 2 bedroom social rented homes with 3 or 4+ social rented housing) This may result in a reduced amount of total social homes but should ensure the housing better meets the acute housing needs of the Borough. <b>No change.</b></p>
538	87	Affordable housing	<p>Affordable housing is an ever prized and increasingly rare luxury in London, but one that I feel should not be so quickly dismissed or overlooked. it is disheartening to see the council state a move from 50% - 40% of</p>	Alt49	<p>It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. <b>No change</b></p>

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			affordable housing and I, I'm sure alongside many others, would urge them to uphold 50% affordable housing within the borough. I have lived my entire life in London, and in Haringey, with an incredible affinity for the city and the borough, I feel and I know that the Council has an obligation to its existing residents, an obligation to look after them and their interests above those of developers and others.		
564	88	Affordable housing target and tenure	We welcome this reduced target and amended mix, however, we would note that the provision of affordable housing and the proposed tenure split should remain subject to site specific considerations and the overall viability of development proposals.	Alt49 & Alt50	Noted and site specific considerations and viability are both material considerations to be taken into account in assessing the extent to which a development proposal accords with the Local Plan policies. <b>No change</b>
579	89	Affordable housing	Wherever possible, new development should be affordable, and delivered by not-for-profit organizations. For-profit high density housing development is of little or no benefit to existing communities, and the council should not be actively encouraging it.	Alt49	Noted, but given the significant housing need within the Borough, London, and nationally, the reality is that housing development is primarily undertaken by commercial developers. This is unlikely to change and is significantly outside of the scope of Haringey's Local Plan to address. A reasonable percentage of housing, on new private development, to be provided as affordable housing, is what the plan can realistically seek to achieve. <b>No change</b>
584	90	Affordable housing	We note that Criteria 5 and 6 have amended the affordable housing requirement, based on the viability assessment. The Council's viability assessment shows that the mixed use development on a site within Haringey Heartland/Wood Green is unviable if it were	Alt49	The target is a borough-wide affordable housing target from all sources of new housing provision. It is therefore not necessary or appropriate to specify differential targets for different areas within the borough. The policies of the Development

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			to provide 30% affordable housing provision. We consider that lower percentage should be set for development in Haringey Heartland/Wood Green, on the basis of the Council's viability evidence, to ensure viability and deliverability of the sites allocated for redevelopment/ regeneration.		Management Policies DPD are flexible enough to take account of site specific circumstances in determining an appropriate level of affordable housing provision on a scheme by scheme basis. However, it should be noted that the Council intends to produce a Wood Green Area Action Plan, and it may be through that document, that a 'Wood Green' level might be set. <b>No change</b>
621	91	Affordable housing	Throughout the plans there is the promise of more affordable homes. However no figure is put on this promise. The vibrancy and character of Tottenham has been created by the unique mix of ethnicities with no dominant group and the affordability of property so that people of all social strata's are able to live side by side. If Tottenham is to retain this attractive mix affordable homes need to be affordable to the most poor in our society. Having spoken to many of my neighbours there is a desire that Tottenham does not become an exclusive area only accessible to the well off and this needs to be reflected in the Councils own plans. Haringey's life and character has been formed through the centuries around its capacity to welcome and accommodate all kinds of people as they settle and start their lives in the UK. Please do not let us plan this out of our future.	Alt49	The target for affordable housing is the figure of 40% of the total number of habitable rooms as set out in Alt49. While crude, and on the basis of a consistent housing mix across all tenures, this would amount to circa 7,920 new affordable homes to be delivered over the entire plan period from 2011 – 2026. A primary objective of the Local Plan is to provide a range of housing choices to promote mixed and balanced communities. <b>An amendment will be made to Alt49 to include a footnote reference to the likely total of affordable housing to be delivered over the plan period.</b>
623	92	Affordable housing & estate renewal	The plans show a considerable reduction to affordable housing and in particular social housing. There must be no reduction in the provision of social housing but rather an	Alt49 & Alt53	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. Through its estate renewal the

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			<p>increase. On developments which include demolishing of existing council/social housing, these should be reprovided on site. Such sites include: SS3 (Apex House and Seacole Court), SS4 (Helston Court and Russell Road), SS6 (Brunel Walk and Turner Avenue), NT1 (Northumberland Park North), NT2 (Northumberland Park), NT3 (High Road West). Affordable housing and social housing should not be used interchangeably as affordable housing can be up to 80% of the market rate and to most people this is not affordable. The council should always push for higher proportions of social housing to address the long housing waiting list. The consultation does not address the council's current housing waiting list. All developments should include social housing and not just state affordable housing.</p>		<p>Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis). Where we can, the policies seek to refer to the intended tenure of affordable housing (i.e. affordable rent, social rent or intermediate rent). Where this is unknown, reference is made to 'affordable housing' but the implication is for affordable rent. This is because the delivery of affordable housing continues to be reliant on the RSL securing grant (although significantly reduced in recent years) either on a proposed scheme or more generally across an RSL's housing portfolio. The Government's condition on grant is that it funds intermediate and affordable rent not social rent. Haringey's need for affordable housing is significant. By not advocating the pursuing of grant, the LPA would not be maximising delivery to meet this significant need and it would be impossible to meet the challenging target of 40% of new homes being delivered being affordable. The Local Plan uses the Government's definition of affordable housing, and it is not proposed to alter this.</p> <p><b>No change</b></p>
645	93	Affordable housing	<p>What does 'affordable' housing mean to a family on an 'average' income? What hope is there in all this for the huge number of Haringey families on the council's waiting list whilst being prayed on by, tax payer sponsored, rogue landlords. What guarantees</p>	Alt49	<p>The definition of affordable housing, including affordable rent and its delivery/funding mechanism, is a matter of national policy. It is not within the scope of the Council nor the Haringey Local Plan to alter this. The Council will however, continue to work with its RSL</p>



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			are there that the developers will not seek to re-negotiate their 'commitments' to all the above "due to unforeseen circumstances"?		partners to encourage them to set rent levels that are affordable to local residents. NB: this is through the Haringey Housing Strategy rather than the Local Plan. There are no guarantees that developers will not seek to re-negotiate their commitments, but would have to have sound grounds to do so that the Council would continue to challenge if a reduction is to be justified. <b>No change</b>
659	94	Affordable housing	<p>Affordable' and social housing: the failure to reach even the very modest % targets from new housing completions. Most so-called 'affordable' housing is well out of the reach of the vast majority of those who need it, and should be radically redefined. Social housing is currently the only genuinely affordable, permanent housing and should be the majority of new builds (it is only a tiny %).</p> <p>An additional point regarding 'Balancing' of housing tenure, the terms used need to be clearly defined because in some recent developments such as Lawrence Road and Brook House they have been misleading: eg</p> <ul style="list-style-type: none"> <li>- "Affordable" ?;</li> <li>- "Private" ?;</li> <li>- "Social rented" – does this mean "council and housing association rented homes for people on council waiting list"?</li> <li>- "Affordable rent or sale" – does this mean "shared ownership – half buy/half rent"? If not what does it mean?</li> </ul>	Alt49	<p>The definition of affordable housing, including affordable rent and its delivery/funding mechanism, is a matter of national policy. It is not within the scope of the Council nor the Haringey Local Plan to alter this. The Council will however, continue to work with its RSL partners to encourage them to set rent levels that are affordable to local residents. NB: this is through the Haringey Housing Strategy rather than the Local Plan.</p> <p><b>Further amendments are proposed (See Alt105) to the definition of affordable housing in the glossary at Appendix 3 to bring this into alignment with the national planning policy definition of affordable housing.</b> A review of all four documents will also be undertaken to ensure the affordable housing terminology used is correct and consistent.</p> <p>A review of the proposed alterations and the existing wording of the extant Strategic Policies DPD did not find the reference to "a high concentration of social rented housing".</p>

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			<p>It is not “a high concentration of social rented housing” that leads to worklessness, poor educational attainment levels, crime and anti-social behaviour. Up until the 1980s Tottenham had high concentrations of council housing without these problems. The causes include the loss of jobs and increasing poverty due to deindustrialisation and national socio-economic policies. The tenor of this paragraph denigrates and discriminates against Council housing and those who live in it, and is arguably illegal under Equalities legislation (through indirect discrimination against people who are strongly represented among Council tenants eg those with disabilities and those from black and minority ethnic backgrounds).</p>		<p>It can only be assumed this appears in one of the other DPDs and amendments will be made within the context of comments to these documents to address this as the Council concurs with the respondents concerns. <b>No change</b></p>
668	95	Estate renewal & affordable housing	<p>This is a massive programme for remaking Haringey, and Tottenham in particular, on a free market model, with the social cleansing of many existing residents. If people need much higher incomes to stay, then market forces will drive poorer people out.</p> <p>Instead, we need more and better council housing. There should be no demolition of structurally-sound council estates. All new housing developments should include at least 50% really-affordable housing for rent, and all new housing developments on public land should consist of 100% publicly-owned, really-affordable housing.</p> <p>There should be government quantitative easing initiatives to write off the historic debt</p>	Alt49 & Alt53	<p>Haringey Council has long been an advocate for the waiving of the historic debt burden and for significantly increasing the currently restrictive borrow cap. We consider this would provide the Council with the resource needed to become a primary deliverer of new housing within the Borough. However, such matters are a Government policy matter and are not within the gift of the Council to seek to change through its Local Plan policies. The Council must therefore take account of the housing market economy and work within the current Government policy framework to achieve the best outcomes it can for the benefit of Haringey residents and businesses. The Council considers that the Alternation and the</p>

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			<p>burden on local authority Housing Revenue Accounts. Much of this debt was taken on long ago, at central government initiative, to build homes many of which have since been sold off or demolished. It is grossly unfair that this burden should be paid by today's smaller and relatively poorer council tenant community.</p> <p>Borrowing for housing, supported by the income stream from rents and service charges, is not considered part of public debt in any other European country apart from the UK. Our government should therefore lift the restrictive 'borrowing cap', so that local authorities can invest in both existing and new-build council housing.</p> <p>Haringey Council should lobby alongside tenants and residents to win the necessary policy changes, working with trade unions, other local authorities, those London Assembly members who have criticised the Mayor's agenda, and MPs and general election candidates. We look forward to working together on this.</p>		<p>emerging Local Plan documents do this. <b>No change</b></p>
669	96	Affordable housing target	<p>While the affordable housing target is revised within the Strategic Policies, it remains set at 50% within the Housing Zone with no evidence as to why these sites would have the ability to deliver affordable housing at 50% if they are within private ownership. The Haringey Housing Strategy's key priority is to meet housing need through mixed communities and one of the key actions are to</p>	Alt49	<p>The initial Housing Zone bid (2014) reflected the extant affordable housing policy position of the adopted Local Plan (2013). An outcome of the use of Housing Zone funding to improve cash flow and accelerate development delivery was to see a greater proportion of affordable housing delivered. However, more recent viability modelling undertaken as part of the Masterplan, shows that, even with</p>

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			<p>develop and promote a range of flexible intermediate housing products. The 2015 Housing Strategy states: <i>"There is currently a particular imbalance in the housing market in Haringey between Tottenham, where 62% of the borough's social housing (council and registered provider) is located, and the west of the borough in places like Highgate and Muswell Hill which provide less than 20% of the social housing stock. As part of the council's ambition for mixed communities, we need to ensure a better balance of housing tenures across the borough, not least to support people on low and middle incomes to access the housing market in the right location for them. To achieve this, and improve the overall balance across Haringey, the council will prioritise the delivery of new affordable rented homes in the centre and west of the borough while promoting more market and intermediate homes, including for affordable home ownership and private renting, in Tottenham"</i>. The Woodgate Group fully supports the need for more affordable homes in the borough, the measures introduced by Policy SP2, and the aspiration to promote a range of flexible intermediate housing products.</p>		<p>upfront Housing Zone money, is unlikely to achieve 50% and more likely 40% is generally more viable. This accords with the Borough-wide policy position and the Tottenham AAP has been amended accordingly. It should be noted that the affordable housing tenure split in Tottenham is still different from the rest of the borough at 60:40 in favour of intermediate housing over affordable rent, in recognition of the existing levels of social housing in the area and the need to improve development viability in Tottenham to achieve quality development and deliver much need social and physical infrastructure improvements. <b>No change</b></p>
694	97	Affordable housing target	Support the reduction in affordable housing target, in line with the outcome of the Council's up to date evidence base document.	Alt49	Support is noted. <b>No change</b>
695	98	Affordable housing target	I object to the reduction in affordable housing stated in this plan.	Alt49	It is not possible to maintain the affordable housing target at 50% as the current evidence

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			On what basis has this been decided and by whom? London as a whole is in the midst of a massive housing crisis so any reduction in this proportion will have a negative effect on people's ability to live in London. More importantly, "affordable" housing, although it is a term widely used, is highly contentious. Most affordable housing as described is not affordable to people on normal incomes. Contained within this is also a reduction in the proportion of social housing. I object to this proposal		base on development viability does not support this. <b>No change</b>
818	99	Affordable housing	We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%. It should be increased to the maximum possible.	Alt49	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. <b>No change</b>
818	100	Affordable housing	There must be an increase on the previous 50% target, not reduction to 40%. See comment in the overall response.	Alt49	Seeking a higher affordable housing obligation from development would only go to make development more unviable and undeliverable, resulting in development not coming forward, which would see housing needs increase further and there would also be no provision of any additional affordable housing. Such a proposition is not sustainable. <b>No change</b>
818	101	Affordable housing	The original 50% target should be increased.	Alt49	Seeking a higher affordable housing is not supported by current evidence. Such a proposition is therefore not sound. <b>No change</b>
818	102	Affordable housing	If the Viability study from 2010 showed that 50% was achievable, why change this to 40? Increase 50% target.	Alt49	More up-to-date evidence shows that 50% is not viable It is also not possible to increase the affordable housing target above 50% as the current evidence does not support this. <b>No</b>

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					<b>change</b>
818	103	Affordable housing	Should increase the original 50% target	Alt49	Seeking a higher affordable housing is not supported by current evidence. Such a proposition is therefore not sound. <b>No change</b>
818	104	Affordable housing	An affordable home is one that is affordable to any tenant earning the London Living Wage. 80% of rental or purchase value is NOT affordable to most residents. 70% of such housing should be social housing.	Alt49 & Alt50	The definition of affordable housing, including affordable rent and its delivery/funding mechanism, is a matter of national policy. It is not within the scope of the Council nor the Haringey Local Plan to alter this. The Council will however, continue to work with its RSL partners to encourage them to set rent levels that are affordable to local residents. NB: this is through the Haringey Housing Strategy rather than the Local Plan. The tenure split better addresses local identified needs. <b>No change</b>
375	105	Affordable housing, tenure mix	On Hillcrest the 60/40 ratio would tip the balance on the estate towards market value holdings (at present there is a ratio of 40% leasehold and 60% tenanted properties). In effect this would force social tenants into a minority and could also have an inflationary effect on property values on the estate (by making it more private and therefore more desirable) thereby moving affordable ownership further out of sight.	Alt50	The quantum of homes to be achieved by infill development on Hillcrest is relatively modest (See Site Allocations DPD) and is therefore unlikely to 'tip the balance' between tenanted and leasehold properties, nor affect property values on the estate, as the new development will be required to be designed to integrate with and complement the existing development on the estate, mitigating any potential impacts. <b>No change</b>
408	106	Housing tenure	Objection to this split as it means more costly homes	Alt 50	Reflects London Plan and is consistent with Haringey's SHMA findings. While intermediate housing is more costly than affordable rent or social housing, it is an important housing product that enables residents, who do not qualify for council housing or market housing, to get onto the property ladder. The split also

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					affects overall development viability – the greater proportion of affordable rented housing, the less ‘affordable housing’ that a scheme can afford. <b>No change</b>
818	107	Affordable housing tenure	We question the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). It is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price range of low income families. With Government cuts and caps to benefits affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency.	Alt50	It is not within the scope or remit of the Local Plan to place a cap on affordable rents. Government policy allows rents ‘up to 80% of market rents’ to be set. The Council understands and appreciates that at this level larger homes are unlikely to be truly affordable for local residents in housing need. As set out in the Council’s Housing Strategy, the Council will therefore continue to work with its RSL partners to encourage them to set affordable rents at levels that reflect local affordability. <b>No change</b>
818	108	Affordable housing	An affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low-income Haringey residents is social rented. ‘Affordable’ is not 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. We therefore demand that <ul style="list-style-type: none"> <li>- a separate and clear percentage for social rented housing be set in the affordable housing provision target;</li> <li>- 70% of that affordable housing target should be social rented housing.</li> </ul>	Alt50	The delivery of affordable housing continues to be reliant on the RSL securing grant (although significantly reduced in recent years) either on a proposed scheme or more generally across an RSL’s housing portfolio. The Government’s condition on grant is that it funds intermediate and affordable rent not social rent. Haringey’s need for affordable housing is significant. By not advocating the pursuing of grant, the LPA would not be maximising delivery to meet this significant need and it would be impossible to meet the challenging target of 40% of new homes being delivered being affordable. A change to 70% being social rent is not supported by current

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					evidence. <b>No change</b>
375	109	Small site affordable housing target	Support the retention of policy SP2 (7)	Alt51	Support is noted and the Policy will be retained unchanged following the successful challenge to the policy status of the Government's ministerial statement. <b>No change</b>
376	110	Small site affordable housing target	The Government have announced the revised affordable housing guidance which is as much a key material consideration as the NPPF.	Alt51	Since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. The extant policy has been subject to consultation and EiP, found consistent with the NPPF, and will be retained unchanged. <b>No change</b>
376	111	Small site affordable housing target	Refers NPPF para 182. Haringey have allocated all their required housing within the borough meeting their identified need and therefore do not have a requirement for affordable housing contributions, particularly on schemes under 10 units /1,000sqm. Consequently, Haringey no longer have an identified need for affordable housing contributions and by continuing to require schemes under 10 units and 1,000sqm to provide a financial contribution are in direct conflict with NPPF and NPPG.	Alt51	The housing requirements in the Local Plan area all minimums which the borough is encouraged to exceed. Small sites, in the form of 'windfalls' will continue to make a significant and important contribution to meeting Haringey's overall housing needs and the provision of a mix of housing types and tenures across the borough. The significant need for affordable housing is well in excess of the 40% strategic target sought by the Local Plan. Therefore, all reasonable and viable opportunities to seek additional affordable housing from all sources should and will be pursued, including from development schemes of 10 or less units. <b>No change</b>
376	112	Small site affordable	The small sites affordable housing requirement will sterilise and stifle	Alt51	All development is subject to assessment on a scheme-by-scheme basis. If viable, as



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		housing target	development of small sites to the detriment of the delivery of much needed new homes, contrary to the London Plan 2015.		demonstrated by the evidence in support of the extant policy, such an obligation will not 'sterilise or stifle' development but will ensure such development contributes to wider social objectives and needs. <b>No change</b>
376	113	Small site affordable housing target	<p>This policy should not be retained and the Council should adopt the revised threshold as intended and advised by the Government and as set out in the NPPG. Refers NPPG para 12. "National planning policy defines specific circumstances where contributions for affordable housing and tariff style planning obligations (section 106 planning obligations) should not be sought from small scale and self-build development, as set out in the Written Ministerial Statement on small-scale developers.</p> <p>☒ contributions should not be sought from developments of 10-units or less, and which have a maximum combined gross floorspace of no more than 1000sqm."</p>	Alt51	Noted however, since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. The extant policy has been subject to consultation and EiP, found consistent with the NPPF, and will be retained unchanged. <b>No change</b>
376	114	Small site affordable housing target	At a meeting with Haringey Council, officers queried the position of neighbouring boroughs with respect to their affordable housing position in light of the revised guidance. We have spoken to all 33 London borough's and set out their policy position in Appendix A. This document demonstrates that 21 boroughs already had a compliant affordable housing policy, seven have changed their policy in light of the revised guidance, two have yet to respond and three, one of which is Haringey, are currently retaining their	Alt51	Noted however, since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. The extant policy has been subject to consultation and EiP, found consistent with the NPPF, and will be retained unchanged. <b>No change</b>

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			policy position despite the new guidance.		
408	115	Small site affordable housing target	Suggest the 20% rate be reduced to 10% for small sites contribution rather than remove entirely, as a compromise. This should be insisted on	Alt 51	Extant policy that has been subject to consultation and EiP, found consistent with the NPPF, and with the successful challenge to Government's assertion that the ministerial statement be considered planning policy, will be retained unchanged. <b>No change</b>
562	116	Small site affordable housing target	A bullet point should be included confirming the need to provide affordable housing contributions for sites of 10 units or less. That pepper potted housing should be the requirement for residential developments that include social housing	Alt51	Extant policy that has been subject to consultation and EiP, found consistent with the NPPF, and with the successful challenge to Government's assertion that the ministerial statement be considered planning policy, will be retained unchanged. <b>No change</b>
584	117	Vacant building credit	Furthermore, it should also be recognised that under national policy, where a vacant building is demolished to be replaced by a new building, the developer should be offered a financial credit when the local planning authority calculates any affordable housing contribution which will be sought.	Alt51	Noted however, since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged and the vacant building credit has been quashed. <b>No change</b>
608	118	Small site affordable housing target	We note the amendment. The new national policy actually allows schemes of <u>10 and fewer</u> dwellings to be exempted from affordable housing obligations. The text should be re-worded to read "with the capacity to provide 11 or more..." We also draw attention to the Written Ministerial Statement dated 25 March 2015 exempting schemes of 10 units and fewer from the allowable solutions element of zero carbon homes. The Council may need to reflect this in the relevant policy.	Alt51	Noted however, since publication of the proposed alterations, the policy status of the Government's ministerial statement has been successfully challenged and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. The extant policy has been subject to consultation and EiP, found consistent with the NPPF, and will be retained unchanged. <b>No change</b>
698	119	Small site	Object to securing affordable housing	Alt51	Extant policy that has been subject to

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		affordable housing target	contributions on sites below 10 units.		consultation and EiP, found consistent with the NPPF, and with the successful challenge to Government's assertion that the ministerial statement be considered planning policy, will be retained unchanged. <b>No change</b>
694	120	Housing mix	Support the proposal to determine mix on a site by site basis.	Alt52	Support is noted but the policy is clear that the mix is to be determined on a site-by-site basis having regard to scheme viability and housing needs as set out in Haringey's latest Housing Strategy. This is further amplified in the housing policies of the Development Management Policies DPD. <b>No change</b>
148	121	Estate renewal	Object to redevelopment of Haringey's council estates as a whole	Alt53	The objection is noted. But to improve, maintain or increase council housing stock, some redevelopment will be required. Alterations are proposed to further justify the need for redevelopment on specific estates within the site allocations of the Local Plan. <b>No change</b>
259	122	Estate renewal	Reduction to 40% is regrettable given acknowledged need for affordable housing. Why more public housing investment is not being planned for? Page 22 SP2 suggests that thousands of social homes will be demolished mostly on post-war estates. Is there not another way of more selectively improving and adding to existing estates?	Alt53	Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis). To improve, maintain or increase council housing stock, some redevelopment will be required. This is selective, as only a small number of estates have been identified for estate renewal. <b>Amendments are proposed to the estate renewal sites within the Site Allocations DPD to further justify the need for redevelopment on specific estates.</b>
259	123	Estate renewal	Page 56: This section is intended to enable	Alt53	Agreed. <b>Include further alteration (Alt109) to</b>

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		-monitoring	monitoring of the plan but there are no measures for what successful “regeneration” of housing estates means.		<b>Appendix 3 to include a monitoring indicator on undertaking successful estate renewal.</b>
375	124	Estate renewal	The inclusion of Hillcrest in this list is unjustified. Hillcrest is not a regeneration site and does not meet the criteria of being in a wider regeneration area or of being 'most at need'.	Alt53	Hillcrest is an infill site that the Council considers is deliverable and will provide much needed additional housing. <b>No change</b>
375	125	Estate renewal	Suggest removing Hillcrest from the list.	Alt53	Hillcrest is an infill site that the Council considers is deliverable and will provide much needed additional housing. <b>No change</b>
415	126	Estate renewal	This alteration identifies a number of priority housing estates for renewal. A number of these (such as Northumberland Park, Culvert Road, Durnford Street and Turner Avenue) are all located within the area of greatest anticipated benefit as a result of Crossrail 2 and in line with LB Haringey’s policy aspirations set out elsewhere, it should be ensured that any redevelopment is sufficiently future proofed so that the full benefits of Crossrail 2 or West Anglia Main Line (WAML) four tracking are captured. Such an approach may also have additional benefits in terms of addressing potential viability issues in Alt64.	Alt 53	Noted. Any redevelopment would take into account potential improvements in public transport accessibility serving the proposal site to optimise development outputs. This would include Crossrail 2 and four tracking of the West Anglia Main Line. The site allocations have been amended, where appropriate, to include a sites location within the Crossrail 2 area. <b>No change.</b>
623	127	Estate renewal	Any developments should include the same amount of social housing re-provided on site.	Alt53	Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis). This is because a number of the estates are dominated by either one or two bedroom homes, and the Council is likely to seek a different mix to provide greater

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					choice, allow for more flexibility in movements between social housing of different sizes to meet occupants changing needs, and to meet the acute need for more family sized social housing. <b>An amendment is proposed to Alt 64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b>
623	128	Estate renewal	No clear provision for existing council tenants: specifically no clear information as to whether existing tenants will be offered their tenancy back and/or have the same/similar conditions in regards to their tenancy should they be offered a tenancy. Existing council tenants should be offered their existing tenancy.	Alt53 & Alt64	The provision for existing Council tenants is to be outlined in the Council's Housing Strategy. <b>An amendment to reference this is proposed to Alt64.</b>
645	129	Estate renewal	Unfortunately, recent history shows that where local government partners itself with private developers, it is the most needy who come last in the order of priorities.	Alt53	Concerns are noted but the Council is satisfied that the principals and objectives of why we are undertaking estate renewal are founded on improving the existing quality of the housing stock alongside other benefits, including improvements to the layout of estates, infrastructure provision, and the opportunity to deliver additional housing to meet local housing needs. <b>No change</b>
645	130	Estate renewal	Where is the security for existing social housing tenants?	Alt53	The provision for existing Council tenants is to be outlined in the Council's Housing Strategy. <b>An amendment to reference this is proposed to Alt64.</b>
648	131	Estate renewal	I am local resident who has lived in the area for 19 years on an estate that was originally all council owned dwellings and still retains many Homes for Haringey Properties. Because of this I am acutely aware of the worries that	Alt53	Chestnut Estate is not included in the current estate renewal programme, although the Council is aware of issues with the existing layout of the estate that results in anti-social behaviour occurring via the service lane to the

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			<p>local people have that the whole plan is a cover for selling off ' council houses / flats' and replacing them with unaffordable 'social housing'. Although I note there are no current plans to do so, (especially since the estate is currently undergoing a long awaited massive Decent Homes improvement) we are also concerned as freeholders on the Chestnut Estate as to future plans for the housing stock there and if our house is to be purchased for 'estate renewal' whether we will get a fair price for it which will enable us to purchase another property of comparable size in the area.</p>		<p>rear. Prior to undertaking any estate renewal development, existing tenants and leaseholders will be actively engaged and invited to participate in the redevelopment plans. In addition, an independent advisor will be appointed to inform you of your rights and the options available to you as part of the renewal plans. The process is long, so there is significant opportunity to offer your views and to discuss acceptable outcomes, prior to any discussion on compulsory purchase, which is always a last option of consideration. Further details on the approach we intend to follow, and how existing tenants and leaseholders will be engaged are set out in the Council's Housing Strategy. <b>An amendment to reference the Housing Strategy is proposed to Alt64.</b></p>
659	132	Estate renewal	<p>The threat of demolitions and 'redevelopment' of Council and social housing estates should be withdrawn Refurbishment is always preferable than demolition. No structurally sound homes should be demolished and there must be no net loss of Council or social housing units. It is a landlord's duty to ensure repairs and maintenance are properly carried out.</p>	Alt53	<p>Beyond replacing structurally unsound buildings, the Council considers there are a number of reasons why estate renewal is appropriate including opportunities to address poorly constructed and laid out estates, or to make more efficient use of the land. In all circumstances, regard will be had to retaining structurally sound and 'fit for purpose buildings', where appropriate or feasible to do so. Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more</p>

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					family sized social housing. <b>An amendment is proposed to Alt64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b>
668	133	Estate renewal & development practice	<p>These plans rely upon speculative private sector actors, without any assessment of the risks or consequences of such a strategy. We seem to be told of a glittering future where property developers join hands with the Council to meet housing needs and deliver social integration, apparently without any price to be paid. This narrative is naïve and unrealistic.</p> <p>Haringey Council has chosen to meet its property investor partners at MIPIM in Cannes, and at Sitematch at the Shard, beyond the reach of any democratic control or scrutiny.</p> <p>Already, conflicts of interest are being resolved on the developers' terms, with reductions in affordable housing quotas to preserve 'viability' (<a href="#">Proposed Alterations to Haringey's Adopted Strategic Policies</a>, Alt 62).</p> <p>Haringey's developer partners will not rebuild existing council estates with the same number of better-quality social homes, because that would not be 'financially viable', meaning not profitable for them (<a href="#">Proposed Alterations</a>, Alt 64).</p> <p>It is alarming that the revised Plan casually states that working with developers 'may require flexible application of normal planning policy expectations for affordable housing</p>	Alt53 & Alt64	<p>The Council no longer has the capacity or expertise to develop out its own land. It is therefore looking to partner with a developer or developers to deliver its programmes for small to medium housing site infill's and estate renewals. The objectives of these programmes are to add to the Council's housing stock and/or to improve the quality of the existing stock. For these programmes to take place, it is necessary that the Council can satisfy itself that the development will be able to pay for itself over a 30 year borrowing period. Funding is often being drawn from a number of sources but there are typically limits or restrictions on what specific funding streams can be used to pay for. Options are therefore being investigated to reduce borrowing levels and financial risks and liabilities. While the option remains that the Council could simply procure a developer to just build the homes and pay them their costs for doing so, it may be more economically sound to have them build the homes and to pay them by either giving them some of the homes to sell on the open market to recover their costs or the Council selling some of the housing to pay the developer. This would significantly reduce Council's costs and would mean we could potentially develop more of</p>

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			<p>provision’, meaning much less affordable housing (Proposed Alterations, Alt 64).</p> <p>There is also a risk, not mentioned here, that even after signing regeneration contracts, development partners will continue to reduce the numbers and standard of social or affordable housing, using confidential ‘viability’ assessments to protect their profits.</p> <p>The Council has embraced privatisation with the proposed stock transfer of Imperial Wharf, where on Haringey’s own figures 81% of residents want to keep council ownership of the estate, and of Noel Park, where 1,042 council homes are within a Conservation Area, and therefore cannot be demolished.</p> <p>The use of Housing Associations to take over Haringey’s rented housing stock, both on stock transfer and demolition estates, is especially problematic as these Associations are currently pushing to be privatised after the general election, with market rent setting and unfettered selection of their tenants in future, ignoring all needs-based waiting lists.</p> <p>There is no proper appraisal here of the strategies of the Coalition Government and the Mayor of London, who aim to raise rents irrespective of real affordability, and reduce the security of tenure that has meant real social inclusion for working class people.</p> <p>There is no appraisal of the risk that public policy may shift even further against the needs of tenants and lower-income homeseekers after the general election,</p>	<p>our land holdings in a much shorter time period. There are numerous other options and variations to the above and the option selected is likely to vary between the different programmes and between sites/schemes. The scrutiny of the procurement process and the final contractual arrangements are outside the remit of the Local Plan but are adequately provided for through the Local Government Act. <b>No change</b></p> <p>With respect to the statement that estate renewal ‘may require flexible application of normal planning policy expectations for affordable housing’ this was to take account of the fact that estate renew requires the replacement of the existing social housing on the site as part of the total development. However, this can now be deleted as we clarified in the development management policy on affordable housing that the affordable housing provision is to be calculated on the total ‘gross’ residential units to be delivered on the site. On this basis, estate renewal should be able to achieve a policy compliant position. <b>Amend Alt64 to remove reference to the flexible application of planning policy for affordable housing provision.</b></p> <p>The engagement of Housing Associations will likely depend on the ability of the Council to use its own stock to decant its existing</p>
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			<p>especially if the outcome is a Conservative government.</p> <p>There is no proper assessment of what Haringey residents are being asked to give up in this risky situation, were we to agree to move away from our secure tenancies, really-affordable rents and democratically-accountable landlord</p>		<p>residents to enable redevelopment to take place and whether development can be phased on site to provide a Council on-site decant option. It is not within the gift of the Local Plan to rewrite national or regional policy with respect to the definition, funding and delivery of affordable housing. <b>No change</b></p> <p>It should be noted that a significant portion of planned development is to take place on privately owned land. The Council seeks to ensure that such development comes forward in a coordinated manner and is consistent with our spatial strategy and the aspirations we have for the places with the borough. Early engagement with landowners and developers is key to ensure they also buy-in to our development plans as they are a key partner in delivering the housing, jobs and infrastructure needed. <b>No change</b></p>
668	134	Estate renewal	<p>The redevelopment plans are relentlessly focused in and around council estates, seeking the strategic alteration of tenure mix by removing the most secure and really-affordable tenure in the rented housing market, i.e. council housing. These plans propose to build housing developments with defined physical attributes, but much less-defined ownership, security of tenure, or rent regimes.</p> <p>The number of homes at risk of demolition just keeps increasing. No official figures are ever given for the total numbers, but we</p>	Alt53	<p>Through its estate renewal the Council will seek to reprove the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more family sized social housing. <b>An amendment is proposed to Alt64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b></p> <p><b>It should also be noted that a number of the estates proposed for renewal have been</b></p>

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			<p>estimate more than 4,000 working class homes are at risk of demolition, and probably around 3,500 of them are on council estates: at Broadwater Farm, Love Lane, Northumberland Park, and on estates in South Tottenham and Bounds Green; and there is no awareness in these documents that these are living communities, at risk of dispersal.</p> <p>We acknowledge that the Council can sometimes listen, and amend its plans. Larkspur Close in Tottenham has been saved, taken off the demolition list, and placed on the decent homes programme, because of persistent campaigning and the active support of a local Councillor.</p>		<p><b>removed off the list in Alt53 in light of a further review of the Council's financial capacity to deliver the renewal programme.</b></p>
818	135	Estate renewal	<p>We strongly disagree with the approach embedded in the wording of Alt53 and Alt64 about Housing Estate Regeneration and Renewal. See detailed comments made in the original document of the Alterations to Strategic Policies. Also see the detailed response and comments we made in relation to housing estate renewal in the Tottenham AAP (in particular in relation to Northumberland park) and in the Site Allocation DPD, summarized in the box below.</p>	Alt53 & Alt64	<p>Opposition is noted. <b>Further amendments are proposed to both Alt53 and Alt64 to give greater clarity to the intended approach to estate regeneration and renewal to address a number of the concerns raised.</b></p>
818	136	Estate renewal	<p>Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</p>	Alt53 & Alt64	<p>The sites identified in the Plan for estate renewal were chosen for renewal because of a range of different reasons including constraints to improving the existing stock quality, to achieve wider estate benefits such as better amenities &amp; safer layouts, or opportunities to make more efficient use of</p>

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					<p>the land. The Decent Homes work and existing maintenance programmes continue to be applied to the vast bulk of the remaining social housing stock across Haringey.</p> <p><b>Amendments are proposed both to Alt64 and to the estate renewal site allocations to clarify the reason(s) why renewal is proposed and the outcomes sought by undertaking renewal of these existing estates.</b></p>
818	137	Estate renewal	There should be absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for an estate.	Alt53 & Alt64	<p>Through its estate renewal the Council will seek to reprove the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis). This is because a number of the estates are dominated by either one or two bedroom homes, and the Council is likely to seek a different mix to provide greater choice, allow for more flexibility in movements between social housing of different sizes to meet occupants changing needs, and to meet the acute need for more family sized social housing. <b>An amendment is proposed to Alt 64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b></p>
818	138	Estate renewal	There should be no demolition of structurally sound homes.	Alt53 & Alt64	<p>Beyond replacing structurally unsound buildings, the Council considers there are a number of reasons why estate renewal is appropriate including opportunities to address poorly constructed and laid out estates, or to make more efficient use of the land. In all circumstances, regard will be had to retaining structurally sound and 'fit for purpose</p>

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					buildings', where appropriate or feasible to do so as this significantly helps in improving the viability of estate renewals. However, in order to optimise the development potential of a site or to address a particular issue, such as the poor layout of an existing building, it may not always be possible or practical to retain even structurally sound buildings. <b>Amendments are proposed both to Alt64 and to the estate renewal site allocations to clarify the reason(s) why renewal is proposed and the outcomes sought by undertaking renewal of these existing estates.</b>
818	139	Estate renewal	We question the claim that housing regeneration through estate renewal and new build has the potential to create new residential neighbourhoods and improve the quality, mix, tenure of housing in the area - increase densities unacceptably, reduce the green and amenity Space, cause unnecessary social disruption.	Alt53 & Alt64	All new development, including estate renewal must be of a high standard of design, layout and efficiency. Redevelopment of Brownfield sites offers the opportunity to create new open space, reconfigure layouts and amenity space – making them more functional, as well as making better connections to the wider green network. Further, redevelopment can incorporate high quality landscaping, make development more ecologically friendly and more energy efficient. Some level of disruption will always accompany redevelopment, but this is temporary and measures are imposed to mitigate or minimise disruptions as far as is practicable. It should be noted that not all estate renewals will result in an uplift in overall housing numbers. <b>No change</b>
818	140	Estate renewal	The conclusion of the majority of the studies carried out in the UK and in countries where	Alt53 & Alt64	The maps showing deprivation statistics for Haringey and across London clearly show a

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			similar policies have been carried out is that there is rather limited evidence that interventions in the housing mix alone can lead to greater social mix and to positive effects for deprived urban neighbourhoods and their residents, in particular tenure mix interventions in social housing estates.		direct correlation between areas of mono-tenure social housing and highest level of deprivation. However, it is acknowledged that the creation or more mixed and balanced communities is only one component to addressing the socio-economic issues affecting existing communities and further interventions, outside the remit of the Local Plan, will be necessary to positively address educational attainment, skills & training, employment opportunities, healthcare etc. <b>No change.</b>
265	141	Housing targets	General support given for increasing housing targets in line with Further Alterations to the London Plan	Alt54	Support is noted. <b>No change</b>
265	142	Housing targets	General support given for increasing housing targets in line with Further Alterations to the London Plan	Alt55	Support is noted. <b>No change</b>
408	143	Wording suggestion	Replace the word 'objectively' with the word 'subjective' or remove entirely. I strongly object to the misuse of this word and its intention.	Alt 55	The terminology throughout National Planning Policy and Guidance is that Council's have to <u>meet</u> their objectively assessed needs, including those for housing. Therefore, the Council does not consider the suggested change appropriate. <b>No change</b>
414	144	Housing target	To ensure general conformity with London Plan Policy 3.3, boroughs need to show in their Local Plans, housing trajectories and/or supporting evidence base that they have sought to identify and bring forward extra housing capacity, to augment minimum targets for housing provision set out on Table 3.1 of the London Plan. Therefore, the council's	Alt55	The Council has sought to meet the challenging new strategic housing requirement set for the Borough by the London Plan. The Council does not consider that rigorous re-appraisal of the SHLAA will render further capacity, given the reliance on probability within the study, rather than 'deliverability' as required to deliver a sound plan in accordance with paragraph 182 of the

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			<p>commitment in alteration reference 55 to exceed the borough's London Plan housing monitoring target and it's objectively assessed need for the plan period is welcomed. However, the council should demonstrate that it has explored all opportunities to bring forward development and identify additional housing capacity, drawing on the particular locations highlighted in Policy 3.3 as having the potential to support higher density development in order to supplement targets. This should involve a rigorous re-appraisal of its SHLAA findings</p>		<p>NPPF. The Council can confirm that the spatial strategy and site allocations of the Haringey Local Plan have taken account of the locations in London Plan Policy 3.3E(a-e) and that the local plan has identified strategic sites with development capacity for 20,040 new homes. With the addition of small sites and windfalls the Local Plan makes sufficient provision to exceed its London Plan target, and therefore fully accords to the London Plan. <b>No change</b></p>
608	145	Objectively Assessed Needs	<p>The plan states that the OAN for Haringey is 13,450 but the text does not state over what time-frame this is for. We assume this to be ten years because footnote 1 states that the OAN is 1,345 new homes per annum. Footnote 1 also states that the OAN is 20,172 net new homes for the period 2015/16 to 2030/31. This is understandable because the Council is preparing a fifteen year plan. We recommend that the reference to the ten year figure of 13,450 is removed to avoid confusion.</p>	Alt55	<p>The OAN of 1,345 net new homes is an annualised figure and can therefore be summed to any relevant period. <b>However, the Council agrees that the wording in the first footnote of Alt55 might be considered confusing, and is therefore proposing to delete this (See Alt55)</b></p>
694	146	Windfall	<p>Strongly support the Council's recognition that windfall sites will contribute to meeting and exceeding the housing need in Haringey and London.</p>	Alt55	<p>Support is noted although this part of the policy was extant. <b>No change</b></p>
268	147	HUCS	<p>The Haringey Urban Characterisation Study (HUCS) is factually incorrect in at least one location, that with which the authors are most familiar. Other inaccuracies may therefore</p>	Alt56	<p>The HUCS is not nor is it intended to be a street-by-street analysis either of existing or recommended building heights. Rather it is a neighbourhood scale assessment of the</p>

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			<p>exist in the document, which therefore should be checked. The building height information is understood to be compiled from LIDAR data and computer modelling (HUCS, Page 247, Appendix2, Data Sources Used).</p> <p>The building heights estimated for Barratt Avenue N22 and Station Road (north) N22 are incorrect. They are invalidated by direct inspection of the sites in question. This has led to an inappropriate 'Findings and Conclusion: Building Height General Recommendation' for Barratt Avenue N22 and Station Road (north) N22. They have been given a 12-21m, 3-6 storey recommendation, rather than a 0-12m, 1-3 storey range. Further explanation of these points is discussed in Annex 1 of this document.</p>		<p>character of groups of streets of similar character within the 11 larger study areas. Therefore within the wider Wood Green study neighbourhood, a neighbourhood scale assessment is correct in finding that there are streets of both 1-3 and 3-6 storeys away from the centre of Wood Green and the major growth areas, and to recommend that in general, 3-6 storey buildings are appropriate along major roads, such as Station Road, with back streets such as Barratt Avenue in the 1-3 storey range. There are several 3 and 4 storey buildings along Station Road and in neighbouring Park Avenue, another of the more important through routes in the area. <b>No change</b></p>
268	148	HUCS	<p>Recommendation: It is suggested that the Council conduct a review of the data in the HUCS Maps of Building Heights, including consulting local residents groups who have accurate knowledge of their local areas, with a view to making corrections in other areas if necessary.</p>	Alt56	<p>LIDAR data does not produce accurate height data for buildings as a whole as they register the height of the highest point of the block concerned and extrapolate that height across the whole of the block. Therefore on higher 2 and 3 storey buildings, rooftop projections such as chimneys and aerials can often tip the data into the next height range. The council staff who prepared the HUCS have a good, detailed knowledge of the borough and examined the LIDAR Data carefully for the more sensitive upper ranges of sites to check for such anomalies, such as large low rise buildings being assessed as higher on the basis of one higher element, but this was not</p>

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					considered necessary for the lower levels. <b>No change</b>
268	149	HUCS	Recommendation: The Council should amend the error in the assessed building heights for Barratt Avenue N22 and Station Road (north) N22, so as to properly reflect the ground truth in the area.	Alt56	See previous comments. No change
268	150	HUCS	Recommendation: The Council should amend the 'Building Height General Recommendation' for Barratt Avenue N22 and Station Road (north) N22, to 1-3 storeys, 0-12m range, so that the area is consistent with the existing building heights and those of neighbouring terraces.	Alt56	See previous comments. It should also be noted that the HUCS is only one consideration when considering the appropriate height of new development, and at the individual site level, site specific considerations factor more heavily, including constraints such as conservation area designation, in the case of Barratt Avenue. <b>No change</b>
569	151	Density	Alteration ref. 56, Section 3.2, para 3.2.7. I note that the <i>Council will assess housing densities in planning applications in line with those set out in the London Plan Density Matrix while taking account of Haringey's suburban and central density settings as shown in Haringey's Urban Characterisation Study 2014.</i> I have not been able to find this study - is it available online? In my experience of a recent planning application consent was given for a development where the density was greatly in excess of the London Plan guidelines. Haringey needs a clear and robust policy on density	Alt56	The Haringey Urban Characterisation Study 2014 is available on the Council's website <a href="http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework-ldf/local-plan-evidence-base#Urban%20Characterisation%20Study">http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework-ldf/local-plan-evidence-base#Urban%20Characterisation%20Study</a> However, it should be noted that density is an important consideration but it only one of a number that are used to determine the optimum development potential of a site – others include site characteristics, surrounding context, design quality, community benefits, delivery of strategic objectives, sustainability etc). As well as development in excess of the London Plan density matrix, numerous schemes are also granted that are below the density matrix as a result of site circumstances



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					and site constraints. <b>No change</b>
408	152	HMO management	A reference to an HMO social responsibility statement should be included	Alt57	An HMO social responsibility statement is more appropriate for the Council's Housing Strategy rather than a planning document. This would ensure it was relevant to existing as well as new HMOs and could be implemented through Housing's issuing of licenses. <b>No change</b>
408	153	SHMAs	SHMAs are politically motivated. I am reluctant to take documents for housing at face value.	Alt 58	Noted, however, they are a fairly robust means by which to establish an areas housing need and the methodology applied has been scrutinized through repeated examinations and challenges through the courts. <b>No change</b>
408	154	Wheelchair housing	20% of all new homes should be accessible	Para 3.2.14	Whilst outside of the scope of the proposed alterations, there is no evidence to support increasing the policy requirement from 10% to 20%. This is also likely to impact on development viability and therefore would have knock on effects on the ability to meet other plan requirements such as design standards and affordable housing. <b>No change</b>
259	155	Affordable housing	Alt 59 raises the question as to how affordable is affordable? 3.2.20 addresses this but is the policy framework strong enough for the Council be able to insist on this?	Alt 59	The Local Plan policies are strong enough to seek the maximum reasonable amount of affordable housing on any individual residential development scheme. The Council will work with its RSL partners to ensure rent levels are set at an affordable level for local residents; however, this is subject to the ability of RSLs to fund affordable housing provision in the first instance. <b>No change</b>
818	156	Affordable housing	See previous comment - we advocate a 70% social rent and 30% affordable rent/intermediate.	Alt59	The alteration is consistent with the findings of the Strategic Housing Market Assessment and also the London Plan. <b>No change</b>

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375	157	Affordable housing	The target should be maintained at 50% and the requirement for schemes of fewer than 10 units to provide 20% affordable housing should be reinstated.	Alt62	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. However, the policy status of the Government's ministerial statement has been successfully challenged and the policy on not seeking affordable housing from small developers on schemes of 10 or less units has been quashed. <b>The deleted part of the paragraph can therefore be reinstated as suggested (See Alt62)</b>
375	158	Affordable housing target	Reduction of the affordable housing target to 40% of habitable rooms will have a negative impact on the Council's stated aims to provide affordable housing and provide mixed and balanced communities.	Alt62	It is not possible to maintain the affordable housing target at 50% as the current evidence base on development viability does not support this. <b>No change</b>
608	159	Evidence base	Maybe the Council should refer to its Viability Assessment of 2015 here rather than the more dated 2010 assessment.	Alt62	Agree, <b>a further amendment to Alt62 is proposed to replace the reference to the 2010 viability study with the most recent 2015 study.</b>
408	160	Higher densities	Higher densities will result in less family housing with gardens and wheelchair accessible homes	Para 3.2.29	Whilst outside of the scope of the proposed alterations, this 'trade-off' is acknowledged within the Local Plan, with new Development Management policies seeking to protect, where appropriate, existing family housing to ensure that across the borough a range of housing needs can still be met. <b>No change</b>
249	161	Estate renewal	Object to the assumption that building higher density mixed tenure developments is likely to be the only realistic option (still requiring public subsidy) and that within this re-providing the extensive council housing with higher quality modern social housing is not a	Alt 64	The replacement of any building on a 1:1 basis is not viable without capital investment. Cross-subsidy, through provision of additional housing on a site, will certainly be one option that will need to be considered to help deliver estate renewal. <b>No change</b>

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			financially viable option.		
249	162	Hornsey	While not in initial list it is noted in the evidence based document (p172) the aspiration for Hornsey in Haringey Urban Character Study for Haringey for consolidation of land within existing estates to provide higher density flats being possible in the longer term and see this as a similar threat to Hornsey communities.	Alt 64	Noted, but to accommodate the borough's growing population, and without building on open space, Green Belt or on our protected industrial employment sites, the very long-term strategy for London and Haringey must be to seek, more generally, intensification of existing residential areas. However, such proposals are not proposed through Haringey's current spatial strategy for the borough and are therefore for consideration beyond the current plan period. <b>No change</b>
375	163	Estate renewal	Regeneration should not be used as a justification for demolition, intensification and private sale of Haringey's council stock. The council must explore creative, community-led options for estate improvements and seek to support and maintain existing social housing communities.	Alt64	Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more family sized social housing. Residents will be heavily engaged in an estate renewal plans from the outset. <b>A further amendment is proposed Alt64 to clarify that residents on the estates will be actively engaged in any proposals to renew their estate.</b>
375	164	Estate renewal	This policy should not form part of the strategic policies – Estate regeneration should be assessed on a community-led, case by case basis and should not be included as part of a wider housing strategy.	Alt64	The Council considers estate renewal to be a strategic planning matter that needs to be proactively addressed in it Strategic Policies DPD. Support for this is apparent by the number of reorientations received to the proposals for estate renewal, including the individual proposed site allocations. The consideration of estates to be subject to renewal is undertaken on a case-by-case basis,

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					having regard to the wider objectives of both the Housing Strategy and the Local Plan, and is heavily influenced by the views and support of residents on each estate. <b>No change</b>
408	165	Higher densities	Higher density will result in less family homes with gardens and wheelchair accessible homes. This needs to be accepted	Alt 64,	Yes it is true that higher density development will result in less family homes with gardens but the local plan seeks to compensate for this by protecting our remaining existing family housing stock, outside of growth areas and allocated sites, ensuring there remains a balance of supply of family housing in more traditional suburban areas. It also introduces a presumption against garden land development. High density however, is actually like to increase the number of wheelchair accessible homes, as proportion of new housing must be wheelchair accessible and most existing housing would not comply with wheelchair housing standards or lend themselves to be converted to meet these standards. <b>No change</b>
413	166	Green roofs	Natural England is supportive of the inclusion of green roofs in all appropriate development. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <a href="http://livingroofs.org/">http://livingroofs.org/</a> for a range of innovative solutions and <a href="http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf">http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf</a> (London GLA 2008) regarding the fit with the London Plan policy.	Alt64	The Council has included a policy on green roofs within the Development Management Policies DPD, where the Council considers the policy more appropriately sits rather than within the Strategic Policies DPD. <b>No change</b>
413	167	Estate renewal	We note that Haringey Council is considering	Alt64	Agreed. The Development Management

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			the replacement, renewal or improvement of estates within Haringey and we would raise the importance of securing green infrastructure (GI) improvements during such plans in accordance with NPPF Para 114.		Policies include provision for a Haringey Green Grid as a means by which to improve access to and between our existing network of open spaces. <b>However an amendment is required and is now proposed (see Alt111) to the Strategic Policies to introduce the concept of the Haringey Green Grid.</b>
581	168	Correction	I am surprised to see a factual error in this statement - there were not just " <i>internal</i> improvements [of Haringey's council housing stock] through the decent homes programme" but millions of public money was spent on <i>external</i> and internal works - there have been extensive works to roofs, electrical systems, windows and other significant improvements. The Decent Homes Programme is currently in full swing and further works are scheduled to take place. The standard of properties improved by Decent Homes is in line with the 21st century legal and living standard requirements.	Alt 64	Noted. <b>Alteration 64 has been substantially amended in response to the representations received and reference to the wording 'internal' improvements has been removed.</b>
695	169	Estate renewal	<u><b>Re: re-providing the existing council housing with higher quality modern social housing is not currently a financially viable option</b></u>  I object to the policy statement underlined. On what basis has this been decided and by whom? This is an assertion unsupported by an evidence here and will inevitably lead to a reduction in the provision of social housing. There is no undertaking here for Haringey Council to meet the needs of the people who	Alt64	Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more family sized social housing. As stated by the respondent, the creation of mixed tenure development will be explored where sites have capacity, providing a cross subsidy to support the replacement of the social housing.

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			are already social tenants, let alone those on its housing waiting list. I do not object to the creation of mixed tenure developments where there is potential for creating a cross subsidy to support the replacement (i.e. an equal number) and expansion (i.e. more units) of social housing units, but this should be a precondition for any mixed tenure developments. There must be no reduction in the provision of social housing but rather an increase		<b>An amendment is proposed to Alt 64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b>
818	170	Estate renewal	We strongly contest and challenge this claim. See overall comment. This paragraph should be scrapped and replaced by a commitment to housing estate improvements without any net loss of social housing units, of refurbishment rather than demolition of blocks.	Alt64	Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more family sized social housing. <b>An amendment is proposed to Alt 64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b>
818	171	Estate renewal	No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.	Alt64	Agreed. The approach to consulting with and engaging existing residents in any development proposal on these sites is set out in the Council's Housing Strategy and is a requirement of s105 of the Housing Act 1985. <b>A further amendment is proposed to Alt64 to clarify that residents on the estates will be actively engaged in any proposals to renew their estate.</b>
818	172	Estate renewal	This needs to be amended to include a reference to the principle of no demolitions of structurally sound homes, and no net loss of	Alt64	Beyond replacing structurally unsound buildings, the Council considers there are a number of reasons why estate renewal is

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			social housing unit and no displacement of resident		appropriate including opportunities to address deprivation or to make more efficient use of the land. In all circumstances, regard will be had to retaining structurally sound and 'fit for purpose buildings', where appropriate or feasible to do so. Through its estate renewal the Council will seek to reprovide the same level of floorspace in social housing (i.e. no net loss in the amount of social housing floorspace rather than on a unit basis) to meet changing housing needs, and to meet the acute need for more family sized social housing. <b>An amendment is proposed to Alt64 to clarify that replacement of social housing will be sought on an equivalent floorspace basis.</b>
408	173	G&TANA	Need to define G&TANA	Alt 66	Agreed. <b>Amend Alt66 to provide the full wording for the Gypsy and Traveller Accommodation Needs Assessment (G&amp;TANA)</b>
685	174	Potential Gypsy Sites	We would recommend the following sites are assessed for suitability to provide Traveller pitches, but other sites in the SA DPD where planning decisions are yet to be made should also be considered. We have looked mainly at sites in (part) public ownership, large sites which could accommodate a small number of pitches as part of other development, sites where reduced heights/densities are recommended and estate renewal schemes. SA5- Clarendon Square SA7 – St Luke’s Hospital SA10 – LBH Civic Centre SA12 – Wood Green Bus Garage SA26 –	Alt66	The Council has commissioned consultants ORS to undertake it G&TANA. However, in the interim the Government has issued a new version of Planning Policy for Traveller Sites (PPTS) on 31 <sup>st</sup> August and is intending to formally revoke the “Gypsy and Traveller Accommodation Needs Assessments – Guidance” (2007). The main change that will impact the assessment of need is the change in the definition of Gypsies, Travellers and Travelling Showpeople to exclude those who have permanently ceased to travel. Council’s consultants are currently unable to advise what this might mean for the assessment of

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			<p>Clarendon Square Gateway  SA27 – Clarendon Road South  SA29 – L/a Coronation Sidings  SA32 – St Ann’s Hospital  SA45 – Highgate Bowl  SA50 – Chettle Court  SA52 – Pinkman Way  SA53 – Cranwood and St James School  SA54 – Tunnel Gardens  SA57 – Park Grove and Durnsford Road  SA63 – Broad Water Farm Area</p> <p>We are aware that the site allocations process is dependent on the results of the Gypsy and Traveller Accommodation Needs Assessment; however we would urge the council to conduct an appraisal of these sites in parallel with finalising the GTANA, to ensure a robust and inclusive process, where actual Traveller site options are being considered alongside other uses from the beginning.</p> <p>The council needs to ensure that meaningful collaboration is taking place on the matter of Traveller site provision, not only with neighbouring local authorities and other stakeholders, but more importantly with the local Gypsy and Traveller community and support groups. The Traveller community has a very good knowledge of the borough and they would be the best placed to give their views on the suitability of sites. Moreover, they would be able to suggest how certain development constraints could be mitigated.</p>		<p>need to be met in the Borough. What is clear is that an assessment completed using the new PPTS definition cannot simply assume that all ‘settled’ Gypsies, Travellers and Travelling Showpeople living on sites, yards and in bricks and mortar have ceased to travel permanently and can be excluded as components of need. The likelihood is that more in-depth fieldwork will be required with all Gypsies, Travellers and Travelling Showpeople living in the borough in order to gain a better understanding of their individual and family circumstances before any conclusions of need can be drawn and the suitability of additional sites, if required, assessed. Such work is unlikely to be concluded before the four Local Plan documents currently being prepared are considered by Cabinet in October for pre-submission consultation. The Council will therefore continue to apply Strategic Policy SP3 and, if required, following the completion of the G&amp;TANA, will undertake further alterations to the Local Plan. <b>No change</b></p>
346	175	Population	The 2001/2011 census figures used to base	Section	The figures come from the Office of National



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		projections	needs on show a population rise of about 26,000 and a 10,000 drop in migrants living in the borough. Can these figures be relied on?	4.1	Statistics and are based on census data, so are therefore considered to be the most reliable data available. <b>No change</b>
267	176	Employment	Maintaining viable existing employment in the Borough is a real world, low cost sustainable way of doing business, and should be a priority.	Alt70	Agreed. The Development Management Policies DPD introduces policies that promote employment-led mixed use development that seeks to secure employment floorspace provision that is affordable and better suited to Haringey's local needs for smaller SME and move-on units. However, affordable business space will likely be delivered at the expense of affordable housing or will require higher densities. <b>No change</b>
267	177	Understand success	A second Council priority should be understanding how and why local companies are achieving their success and situated in the Borough (in spite of the current lack of Council engagement), to encourage expansion and sustainable growth. I note that it is notoriously difficult for large public sector organisations to understand busy and expanding medium-sized private organisations. 'Liaising' with funded 'representatives' is not effective. Unlike the Council, the sector does not behave as a unified complex bureaucracy.	Alt70	The Council does work with the local business community to better understand the strengths, weaknesses, threats and opportunities of working in Haringey and London. In response, and in the context of the Local Plan, this means providing the right policy framework that protects or safeguards employment sites/locations for various employment uses, seeks new provision better tailored to local demands, clustering uses to ensure they benefit from shared working, providing affordable workspace where possible to help local businesses establish or be retained in the Borough, uphold policies around the servicing needs of businesses, including parking needs and access to fast broadband. <b>No change</b>
267	178	Local employment benefits and	Other initiatives could involve implementation of a local resident employment requirement in the huge anticipated building developments.	Alt70	Noted. The planning obligations policy and SPD seeks to ensure local residents and businesses benefit from the new development

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		self build	Maintaining local control - e.g. direct funding and management of house building; holding on to the land, and retaining control of building employment would provide local jobs in contrast to the scenario being acted out currently in the Clarendon Square site, where currently a team from Birmingham is to work on site, and no undertakings or contract re employment whatever have been secured from an as yet unknown developer, as the Council have failed to exercise appropriate demands re real sustainable private sector employment (as opposed to contributions to public sector budgets for training). Some of the proposed huge housing developments should be built by local people working for locally headquartered non profits and Council partner companies, replacing imported specialist teams working for large multinational corporations.		proposed through apprenticeships, training, and use of local supply chains in the construction phases and prioritising local employment opportunities in new businesses There are also policies that address self-build but prospects in London and Haringey for such opportunities are likely to be scarce given land values, housing requirements and density expectations. <b>No change</b>
640	179	Business relocation	Policies concerning relocation of business should be as strong as possible.	Alt70	The relocation of businesses is not an issue for the Local Plan to address. Rather the Council's Regeneration Strategy and Economic Development Strategy addresses Council's approach to facilitating the relocation of local businesses displaced as a result of new development. The role of the Local Plan in this context is to ensure that a suitable stock of employment land is maintained to enable businesses to relocate to suitable premises/sites within the borough. <b>No change</b>
644	180	Evidence base	A survey of businesses should be conducted	Alt70	The Employment Land Review was very

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			for the next version of the Tottenham AAP as the economic evidence base for the local planning documents out to consultation is currently inadequate in light of NPPF requirements. The AAP should be amended in light of this survey.		recently updated and is an appropriate evidence base required to support the Local Plan documents. <b>No change</b>
694	181	NPPF consistency	<p>This policy is unsound – it is not justified and is not consistent with national policy. The policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites.</p> <p>Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with emphasis added) <i>“Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest further decline in industrial and warehousing employment which is expected to result in some surplus employment land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to contribute to Haringey’s housing and regeneration objectives. At the same time, it will be important that fit-for-purpose, well occupied</i></p>	Alt70	The Council believes that the principal of preserving employment uses on non-designated employment sites is sound, particularly given the demand for additional employment land as set out in the Employment Land Review, the need to retain choice in both types and location, and the relative land values of employment and residential uses in the borough. Flexibility regarding the development, for non-employment generating uses, of non-designated employment sites is set out in draft policy DM52. This approach ensures compliance with the intent of the NPPF. The release of non-designated employment land will be monitored, and managed to ensure a sufficient stock is retained in the borough. <b>No change</b>

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			<p><i>B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities.”</i></p> <p><i>“The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community. At the same time, there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough’s housing and regeneration pressures.”</i></p> <p>The release of an employment site for an alternative use can lead to the regeneration of an area through the introduction of new investment. The potential for a sites release from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.</p>		
818	182	Employment land	We support proposed amendment Alt70 which confirms the borough will protect non-designated employment sites in order to secure a strong economy.	Alt70	Support is noted. <b>No change</b>
818	183	Permitted development	Since the Strategic Policies were adopted, ‘changes to permitted development rights, which give greater scope for the permitted change of use of offices and shops to go to residential development’. We do not see any	Alt70	No, such changes were intended to be time limited to three years. The benchmark for exemption was also set very high to introduce an Article 4 Direction to withdraw such rights. To do so requires a number of tests to be met,

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			consideration within the proposed alterations of the impact of these changes, despite the likelihood that they will result of the loss of considerable employment land to housing, with impacts on Haringey Council's ability to secure space for jobs, especially affordable workspace. Well located workspace may be particularly at risk of loss, with potential negative impact upon the diversity of uses which ensure the vitality of town centres and high streets. The Strategic Policies and other documents should explain how Haringey Council will manage and monitor the impact of these changes, as required by the Further Alterations to the London Plan (FALP).		including evidence of likely harm. The Council will continue to gather evidence of the impact of changes to permitted development, through monitoring of prior approvals, and will take action as necessary to address harmful impacts. However, in the absence of current evidence of harmful economic impacts, it is not appropriate that the Strategic Policies be amended to flag this up as a matter to be addressed. <b>No change</b>
408	184	Employment land figure	Please explain the large decrease in demand?	Alt71	The alteration reflects evidence from the Council's updated Employment Land review, which concludes that the trend based employment forecast projections should be used rather than the baseline scenario used in 2012. It reflects the continued decline in manufacturing in London and Haringey which is being replaced by SME's which have a much smaller land area requirement. <b>No change</b>
415	185	Employment land need	Noting the reduction in floorspace protected through Alt 71, and mindful of the opportunities presented by Crossrail 2 and other projects to deliver growth, TfL would support a continuing review of employment land need in the area.	Alt 71	The Council has and will continue to monitor and review its employment land needs to ensure local planning policy response accordingly. <b>No change</b>
640	186	Employment land figure	The Plan forecasts that the demand for new industrial workspace will go down from 137,000 sqm. to 32,000 sqm. It seems	Alt71	The alteration in floorspace target reflects the most recent evidence from the Council's updated Employment Land review, which

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			counterproductive to plan for less new employment floor space at a time when Tottenham's population and economy is projected to grow so rapidly. This figure should be withdrawn.		concludes that on trend based employment forecast projections, there is likely to be a shortfall of some 23,000 sq m of employment floorspace to meet B class use demand. This reflects actual development trends in the borough. <b>An amendment is proposed to Alt71 clarify that the figure of 32,000 sqm is actually meant to be 23,000 sqm, but represents demand for additional floorspace.</b>
638	187	Employment land figure	<p>The broad concern is loss of employment space and loss of existing businesses as a result of the relaxation of policy, and the over emphasis of residential-led development and retail in its place.</p> <p>I disagree with your policy alterations (Alt71) which decreases the forecast demand of new industrial workspace from 137,000 m<sup>2</sup> to 32,000m<sup>2</sup>. This would appear to be at odds with the Borough's desire to see Tottenham "at the centre of British Manufacturing boom" <a href="http://www.haringey.gov.uk/news/manufacturing-boom">http://www.haringey.gov.uk/news/manufacturing-boom</a> as well as at odds with projections for growth.</p>	Alt71	<p>The alteration in floorspace target reflects the most recent evidence from the Council's updated Employment Land review, which concludes that on trend based employment forecast projections, there is a need for <u>an additional</u> 23,000 sq m B class floorspace, above that already existing, to meet anticipated demand. This reflects actual development trends in the borough. With the continued decline in traditional manufacturing, and the need to make efficient use of Haringey's finite land space, there is a need for the borough to reconfigure our existing industrial portfolio of land away from warehouse sheds to more intensive employment uses, protecting the best quality sites and essentially phasing the release of the rest to mixed use development. Retail and service industry jobs grow as a result of Haringey's population growing, although the former is changing more towards leisure uses that primary retail shops. <b>An amendment is proposed to clarify that the figure of 32,000 sqm is actually meant to be 23,000 sqm, but</b></p>

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					<b>represents demand for additional floorspace.</b>
818	188	Employment land; population	We strongly disagree with proposed amendment Alt71 which decreases the forecast demand of new industrial workspace (B use classes) from 137,000 sqm to 32,000 sqm. While the amendment proposes this figure has come from the update of the Employment Land Study for Haringey, it is not clear where this exact figure has come from as it does not appear in the review. We have identified a range of serious concerns about the Employment Land Study update (see comment about that in our overall response). It seems entirely counterproductive to reduce ambition for new employment floorspace at a time when Tottenham's population and economy is projected to grow so rapidly, by the London Plan at least. This proposed amendment should be withdrawn pending a new full review of Tottenham's industrial land.	Alt71	<p>The alteration reflects evidence from the Council's updated Employment Land review, which concludes that the trend based employment forecast projections should be used rather than the baseline scenario used in 2012. It reflects the continued decline in manufacturing in London and Haringey which is being replaced by SME's which have a much smaller land area requirement. The Council believes it to be more prudent to use a locally specific, and historically based, demand forecast, hence the use of this figure.</p> <p>It should be noted that the figure in the alterations was incorrect, and the actual figure is 23,000 sqm as set out at paragraph 7.11 of the Employment Land Review (2015)</p> <p>It should be noted that jobs growth will come from a number of sources including making more intensive use of existing employment floorspace, enhanced retail and community infrastructure provision, and through the construction sector.</p>
414	189	Employment land designation	Alteration 72 proposes the de-designation of three Locally Significant Industrial Sites (LSIS) to reflect changes being consulted on through the council's Site Allocations and Tottenham Area Action Plan documents. The council has recently published the Haringey Employment Land Study	Alt72	<p><b>The re-designation of White Hart Lane LSIS was an error and has been amended.</b></p> <p>The Council agrees that it would be helpful to include a list of the current designated employment sites in the plan along with their type of employment land designation and <b>a further alteration (See Alt110) to this effect has been made.</b></p> <p>With regard to the total quantum of industrial</p>

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			<p>(February 2015) which provides recommendations on the future of each of these three sites. In accordance with London Plan Policy 4.4 the de-designation of LSIS should be justified by the council's evidence base. It is noted that the council has confirmed that de-designation of White Hart Lane LSIS is an error in the consultation document. Please see the Site Specific Allocations and Tottenham Area Action Plan sections below and Appendix 2 for detailed comments on these proposals.</p> <p>To set the changes in LSIS designations in a strategic context it would be helpful if the council listed in the Strategic Polices all the employment related site allocations, including those allocated as Employment Land and Regeneration Areas, as well as LSIS and Strategic Industrial Locations.</p> <p>In addition the council should detail what the total quantum of industrial land release will be and how this will bear upon the borough's indicative industrial land release benchmark in the Mayor's Land for Industry and Transport SPG, having regard to other planned and actual release over the period 2011-2031.</p>		<p>land being released, the removal of the Locally Significant Industrial Sites designation from certain employment areas does not mean they have been released. Rather their employment classification has changed to that of a Local Employment Area, which still seeks to protect employment use but allows for the introduction of other uses if necessary to help reconfigure the existing stock to more intensive employment uses.</p> <p>The only areas proposed for de-designation are DEA8:N17 Studios 784-788 High Road and the southern part of DEA15: Tottenham Hale - the "island" between Ferry Lane, the Hale and Hale Road. The former because of the granted Tottenham Hotspur development, which has seen the supermarket already delivered and the remainder of the site cleared (only 278sqm of B Class use was recorded on the site at the last ELR in 2014/15). The latter because of the considerable new non-B class development present on this southern corner of the area, including a new nine-storey Premier Inn hotel. The total land area de-designated is 4.8ha.</p>
509	190	Employment land designation	<p>Contends that this area has established residential use, and therefore it is inappropriate to allocate an employment designation.</p>	Alt72 & SA38	<p>The area was and is currently designated for employment use. Residential elements have crept into the area to use the commercial space as both affordable work and living space. However, such use was not established through the appropriate planning process, and while now lawful, the Council considers the</p>



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					<p>main use of the area to be employment but to work with the landowners to formalise the current use through a new warehouse living policy. While area is intended to have a mix of uses, the Employment Land Review confirms that, despite the unplanned residential use, significant swathes of the site are still in active employment use and should be protected for ongoing employment use. The Council therefore considers the employment area designation to still be the most appropriate designation for this area but has proposed to change part of the areas designation from. Locally Significant Industrial Location to Regeneration Area. <b>No change</b></p>
818	191	Employment land designation	<p>Proposed amendment Alt72 should be withdrawn. We strongly disagree with the proposed downgrading of the employment land status of Crusader Industrial Estate; High Road West; part of Vale Road/Tewksbury Road; and White Hart Lane. The Employment Land Study describes these sites as well occupied and well performing in its description of individual industrial sites from p.23: Crusader Industrial Estate is the site of Haringey Council's investment in fashion and textiles; both sectors requiring industrial workspace. [Elsewhere, it is mentioned that 'some industrial estates are at risk of being converted to alternative uses. This is evidenced with Crusader Industrial Premises not providing leases of more than 5 years, which indicates that the landowner may have</p>	Alt72	<p><b>The re-designation of White Hart Lane LSIS was an error and has been amended.</b>  The re-designation of High Rd West, Crusader Industrial Estate and parts of the Vale Rd/Tewksbury Rd estates from a Locally Significant Industrial Site to a Local Employment Area designation reflects the recommendations of the Employment Land Review, the mix of uses that already exist on these sites and the Council's aspiration to continue to see change in these areas. Other policies in the plan, namely the Warehouse Living policy and site allocations, seek to build on the positives of these areas, rather than force them out.  <b>No change</b></p>

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			<p>other intentions for the site's future use' (p.18). Retaining this site as employment space will therefore require strong planning policy protection to prevent owners driving out existing uses and preventing investment through the use of short term leases.] High Road West is described as 'well occupied and is therefore serving the needs of local businesses' (p.27). Vale Road/Tewksbury Road is the site of unplanned warehouse conversation as well as 'significant swathes of the site are still in active employment use however and should be protected for ongoing employment use' (p.30). White Hart Lane is described as a site which 'provides premises that are of a good quality and age and a good level of accessibility and parking provision' (p.31) – and it is recommended that its LSIS designation is retained.</p> <p>If the protections of these sites are removed, it is likely that their functions will be damaged through housing and mixed use development. Indeed, it is clear that this is the intention in the case of areas being proposed to be given the status of 'Regeneration Area' rather than Locally Significant Industrial Site (LSIS). There is a strong need for industrial land in London, and these well performing areas should continue to be protected as required by the London Plan. The Council risks its aspirations for regeneration damaging the strengths of its existing local economy – these strengths are acknowledged in regeneration and economic</p>		
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			development strategies but not in its planning policies. All of the strengths mentioned in the Opportunity Investment Fund for Tottenham Factsheet, for instance, require industrial workspace which the Strategic Policies do not sufficiently protect: ‘artisan bakers, craft breweries, gourmet popcorn manufacturers, royal uniform makers and high end furniture makers’ (Tottenham Opportunity Investment Fund factsheet).		
818	192	Employment	Proposed amendment Alt76 is not clear. What is the purpose of this amendment and where is the evidence base for this? Is the intention to allow more mixed use development within Local Employment Areas? If so we strongly disagree and propose this amendment is withdrawn.	Alt76	The alteration to the last sentence did not highlight the replacement text which sought to replace the wording “by not placing significant restrictions on employment use that is permitted” with “by carefully managing the type of use that is permitted”. The purpose of the alteration was to better recognise that the mixed uses to be provided on these Local Employment Sites have to be compatible to existing retained uses as well as proposed uses. <b>The original alternation (Alt76) has been amended to highlight the proposed new text.</b>
267	193	Industrial area & SMEs	Notes policy 5.1.17 and parts of paragraph 5.1.29	SP8 5.1.17 & 5.1.29	Noted but not subject to alternation. <b>No change</b>
267	194	Employment	It is foreseeable that scarce public sector resources will be assigned to an implicit priority of attracting new employers to the area to meet targets. Council members and officers have ventured out on international expeditions with a view to attracting new business interests to the Borough.	Alt77	The Local Plan target is to create 12,000 jobs across the borough through realising the development potential of sites for retail, community facilities, intensification of existing employment site, through local supply chains for the development industry, and local labour in the construction sector, which includes

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			<p>I am delighted that for example, the N17 Design Studio is collaborating with the College of Haringey, Enfield and North East London in a 12-month pilot project to give local students the chance to learn key skills with globally recognised architects John McAslan. This high profile initiative has required considerable public investment to provide local work placements. Nothing wrong with that – but this is simply a training initiative; with the potential to be yet another revolving door. There are already many opportunities for unpaid work and training - the problem in Haringey is that people need permanent jobs that pay decent wages. The number of permanent and sustainable jobs likely to be created is at present unclear – not many, one suspects.</p>		<p>training, skills and apprenticeships. <b>No change</b></p>
267	195	Employment growth	<p>Haringey has the most ambitious employment growth plans in London. The plan over the period 2011 2036 forecasts an additional 22,000 jobs (29.5% increase) the highest of London boroughs. It is important to identify issues relevant to achieving these ambitious targets.</p>	Alt77	<p>The issues are those already set out in the Strategic Policies DPD, being to effectively manage growth and development, ensuring the best employment sites are protected and other reconfigured to deliver high employment densities and affordable workspace through housing cross-subsidy if necessary, provision of new community facilities, and protect of town centres, through robust policies on the location of non-retail uses, out-of-centre uses, transport improvements alongside diversification into growing sectors such as leisure sectors. The trade-offs also continue to be the same between delivering jobs, development</p>

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					densities, and planning policy obligations such as environmental standards, amenity, affordable housing etc. <b>No change</b>
408	196	Employment growth	What growth has there been since 2011 and how does this correspond with the forecast?	Alt77	Growth is set out in the ELS, and this informs the revision to the target. <b>No change</b>
408	197	Employment growth	How does the job growth relate to the projection from 2011 to the present day?	Alt77	The delivery of jobs is monitored through the Authority's Monitoring Report, published annually. This records new employment floorspace permitted as well as that lost as a result of development. The latest AMR shows a net loss in floorspace since 2011 but requires further analysis regarding land lost as well as job densities of re-provided floorspace. <b>Include an additional indicator for SP8 to monitor change in employment use (i.e. the change in employment densities) as well as employment floorspace lost or gained.</b>
638	198	Employment	<p>Whilst I vigorously support the regeneration of Tottenham and many of the strategies outlined in the Local Plan documents, I am writing to express some concern over aspects of the Local Plan with relation to economy and jobs.</p> <p>The AAP strategy document claims that 5000 new jobs will be created. There is no clarity over how this figure is derived, and if it can be implemented in practice. The figure must clearly state NET gain or loss of jobs in comparison with the existing situation. I do not believe that the strategy allows for a net gain of 5000 jobs given jobs lost as a consequence of delivering the strategy. There is little evidence of real insight into what jobs</p>	Alt77	The creation of new jobs will come from a range of sources, including through the intensification of existing employment use regeneration areas, through the provision of new and enhanced community facilities, through the construction of the development planned in terms of both the local supply chain and well as construction industrial, and the new District Centre at Tottenham Hale will also create additional town centre jobs in retail, office and service sectors. <b>More detail on the land uses expected to be delivered on each of the sites, and therein, the likely types and amounts of employment each site is to contribute to the 5,000 jobs target will be set out in the next iteration of the Tottenham</b>

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			and industries currently exist in the area, their links with local people, their interdependences and supply chains. Based on experience from Gort Scott's indepth study of industrial areas in Tottenham (From Around Here, Haringey 2013, attached), I do not believe that local employment has been adequately assessed and studied. Our study showed that Tottenham's industrial areas, for example, house large numbers of jobs and businesses, and also provide valuable source of affordable workspace for many non-industrial, service and artisanal uses. Relaxing the protection of these uses risks undermining the Borough's existing local economy, which regeneration should be building upon and nurturing.		<b>AAP.</b>
661	199	Employment land figure	Haringey's Local Plan Alterations to Strategic Policies pledges to protect industrial land 'even when non designated" (SP8) However the forecast demand has been reduced to just 32,000 m2 up to 2026 The Employment Land Study (5.1.21) predicts a total requirement of 137,000m2, which included a net reduction in demand. This indicates the predicted increased jobs (5.1.18) will not be matched an increase in workspace	Alt77	SP8 does not alter as a result of the revised figure which still demonstrates a demand for new employment floorspace for an <u>additional</u> 23,000m <sup>2</sup> . The increased jobs target will be delivered through the reconfiguration of employment land to more intensive employment uses, through growth in retail and service sectors, the additional community facilities provision planned and through construction in both local supply chain and apprenticeships. <b>An amendment is proposed to clarify that the figure of 32,000 sqm is actually meant to be 23,000 sqm, but represents demand for additional floorspace.</b>
818	200	FALP employment	Proposed amendment Alt77 introduces updated jobs targets for Haringey, introduced	Alt77	The Council continues to see the 22,000 target by 2036 as being challenging. The target for

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		figure	<p>by the Further Alterations to the London Plan, which forecast 22,000 new jobs between 2011 and 2036, which would give the highest employment growth rate of all London boroughs. The borough itself said these growth rates could not be delivered in its response to the consultation on the FALP (<a href="https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf">https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf</a>). And the Employment Land Study says that this scenario 'would result in levels of B use class employment growth that Haringey has not witnessed in the past two decades and would result in significant additional employment land requirements that would be difficult to provide for given the limited availability of sites and the Borough' housing and regeneration policies' (p.49). The Study recommends Haringey therefore does not plan on the basis of the FALP employment projections, but the much lower trend based projections. This means the plan is unsound as regards to the FALP. This quote also confirms the view that Haringey's – and Tottenham's specifically – supply of industrial land is being sacrificed to deliver its housing and regeneration priorities. This will have severe impacts on the nature and character of Tottenham for years to come, weakening the prospects for sustainable and inclusive development that actually benefits local people and local businesses.</p>		<p>the Plan period (2015-2026) is 12,000 new jobs. In committing to deliver the London Plan housing target for the borough, the Council is committed to delivering a commensurate quantity of jobs proportionate to the housing growth, thereby ensuring that the development is sustainable. The 12,000 new jobs will not just come from the intensification of employment use of designated employment sites, but also from a range of sources, including the retail and service industry sectors, growth in offices, the provision of community uses and from the construction industry, associated with the delivery of Haringey's increased housing requirement. The Council will need to revisit the capacity to continue to deliver the high quantum of housing and jobs after 2026. <b>No change</b></p>
818	201	Employment	Proposed amendment Alt 78 makes reference	Alt78	As set out in Alteration 78, the consultation

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		land evidence base	to a stakeholder consultation done as part of the Employment Land Study. The study should list who was included in this consultation. We do not believe existing businesses were part of this consultation. Policies in support of workspace for SMEs should not just engage real estate and commercial developers in considering how to deliver new affordable workspace but also engage existing businesses and business groups about what their needs are and how existing low cost workspaces can be retained and supported. Alt 78 should confirm how existing businesses and businesses have been consulted and what the council's policies are in relation to existing low cost workspace.		was only held with local agents as they provide intelligence independent from local businesses. This enabled the study to gain a perspective of the overall market trends, rather than anecdotal responses from individual businesses, whose circumstances may differ significantly. This is in line with standard practice for a study of this type. This consultation is a key opportunity for local businesses to make representations on the Local Plan itself. Controlling the cost of existing workspaces is outside the scope of the Plan. There is however a proposal to cap at an affordable level commercial rents in new developments in the Development Management Policies where mixed use development is proposed for existing employment sites. <b>No change</b>
267	202	Existing areas	Pleased Haringey has been advised that (5.1.26) <i>'among other things, that growth should focus on successful areas and not start from scratch'</i>	SP8 5.1.26	Noted but not subject to alternation. <b>No change</b>
414	203	Housing requirement	To ensure general conformity with London Plan Policy 3.3, boroughs need to show in their Local Plans, housing trajectories and/or supporting evidence base that they have sought to identify and bring forward extra housing capacity, to augment minimum targets for housing provision set out on Table 3.1 of the London Plan. Therefore, the council's commitment in alteration reference 55 to exceed the borough's London Plan housing	Alt90	The Council has sought to meet the challenging new strategic housing requirement set for the Borough by the London Plan. The Council does not consider that rigorous re-appraisal of the SHLAA will render further capacity, given the reliance on probability within the study, rather than 'deliverability' as required to deliver a sound plan in accordance with paragraph 182 of the NPPF. The Council can confirm that the spatial strategy and site allocations of the Haringey



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			<p>monitoring target and it's objectively assessed need for the plan period is welcomed. However, the council should demonstrate that it has explored all opportunities to bring forward development and identify additional housing capacity, drawing on the particular locations highlighted in Policy 3.3 as having the potential to support higher density development in order to supplement targets. This should involve a rigorous re-appraisal of its SHLAA findings</p>		<p>Local Plan have taken account of the locations in London Plan Policy 3.3E(a-e) and that the local plan has identified strategic sites with development capacity for 20,040 new homes. With the addition of small sites and windfalls the Local Plan makes sufficient provision to exceed its London Plan target, and therefore fully accords to the London Plan. <b>No change</b></p>
584	204	Housing trajectory	<p>The Council's housing trajectory at Appendix 2 has no evidence base to understand how the trajectory and 5-year rolling housing supply are delivered, as it does not appear to be based on the most recent Annual Monitoring Report published in July 2014. Therefore, we request an opportunity to comment once further evidence for the trajectory is published, as it is not clear whether the trajectory demonstrates sufficient capacity to exceed the Borough's objectively assessed need and its strategic housing requirement.</p>	Alt90	<p>The housing trajectory at Appendix 2 is based on the latest AMR data at the time of publication. <b>As almost a further year has passed since the alterations were published, the housing trajectory will again be updated in Appendix 3 (see Alt90).</b></p>
408	205	Political nature of planning policy	<p>The political nature of planning policy is sometimes a cause of concern, as well as hope</p>	Alt91	<p>Noted. <b>No change</b></p>
408	206	Wording suggestion	<p>Replace 'meet' with 'aim to achieve' in both sentences</p>	Alt 92	<p>The terminology throughout National Planning Policy and Guidance is that Council's have to <u>meet</u> their objectively assessed needs, including those for housing. Therefore, the Council does not consider the suggested change appropriate. <b>No change</b></p>

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408	207	Wording suggestion	Replace 'meet' with 'aim to achieve' in both sentences	Alt 94	The terminology throughout National Planning Policy and Guidance is that Council's have to <u>meet</u> their objectively assessed needs, including those for housing. Therefore, the Council does not consider the suggested change appropriate. <b>No change</b>
818	208	Affordable housing target	The 50% target should be increased.	Alt95	It is not possible to increase in the affordable housing target as the current evidence base does not support this. <b>No change</b>
818	209	Affordable housing	An affordable home is one that is affordable to any tenant earning the London Living Wage. 80% of rental or purchase value is NOT affordable to most residents. 70% of such housing should be social rented.	Alt96	The definition of affordable housing, including affordable rent and its delivery/funding mechanism, is a matter of national policy. It is not within the scope of the Council nor the Haringey Local Plan to alter this. <b>An amendment will be made to the current definition of affordable housing in the glossary to bring this into line with the Government's policy definition (See Alt105).</b>