

NOTICE OF MEETING

STRATEGIC PLANNING COMMITTEE

**Tuesday, 20th June, 2023, 7.00 pm - George Meehan House,
294 High Road, Wood Green, London, N22 8JZ (watch the live
meeting [here](#), watch the recording [here](#))**

Councillors: Barbara Blake (Chair), Reg Rice (Vice-Chair), Nicola Bartlett, John Bevan, Cathy Brennan, George Dunstall, Scott Emery, Emine Ibrahim, Sue Jameson, Sean O'Donovan and Alexandra Worrell

Quorum: 3

1. **FILMING AT MEETINGS**

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. Members of the public participating in the meeting (e.g. making deputations, asking questions, making oral protests) should be aware that they are likely to be filmed, recorded or reported on. By entering the 'meeting room', you are consenting to being filmed and to the possible use of those images and sound recordings.

The Chair of the meeting has the discretion to terminate or suspend filming or recording, if in his or her opinion continuation of the filming, recording or reporting would disrupt or prejudice the proceedings, infringe the rights of any individual, or may lead to the breach of a legal obligation by the Council.

2. **APOLOGIES FOR ABSENCE**

To receive any apologies for absence.

3. **URGENT BUSINESS**

The Chair will consider the admission of any late items of urgent business. (Late items will be considered under the agenda item where they appear. New items will be dealt with under item 9 Below).

4. **DECLARATIONS OF INTEREST**

A member with a disclosable pecuniary interest or a prejudicial interest in a matter who attends a meeting of the authority at which the matter is considered:

(i) must disclose the interest at the start of the meeting or when the interest becomes apparent, and

(ii) may not participate in any discussion or vote on the matter and must withdraw from the meeting room.

A member who discloses at a meeting a disclosable pecuniary interest which is not registered in the Register of Members' Interests or the subject of a pending notification must notify the Monitoring Officer of the interest within 28 days of the disclosure.

Disclosable pecuniary interests, personal interests and prejudicial interests are defined at Paragraphs 5-7 and Appendix A of the Members' Code of Conduct

5. DEPUTATIONS / PETITIONS / PRESENTATIONS / QUESTIONS

To consider any requests received in accordance with Part 4, Section B, paragraph 29 of the Council's constitution

6. MINUTES (PAGES 1 - 10)

To confirm and sign the minutes of the Strategic Planning Committee meeting held on 20 February 2023 and 15 May 2023 as a correct record.

7. PLANNING AND BUILDING CONTROL 2022-23 UPDATE (PAGES 11 - 50)

To consider a report on the work of Planning and Building Control for 2022/23.

8. PROPOSED DRAFT LOCAL VALIDATION LIST FOR CONSULTATION 2023 (PAGES 51 - 92)

9. NEW ITEMS OF URGENT BUSINESS

10. DATES OF FUTURE MEETINGS

To note the dates of future meetings:

13 November 2023

19 February 2024

Felicity Foley, Committees Manager
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Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Monday, 12 June 2023

MINUTES OF THE STRATEGIC PLANNING COMMITTEE MEETING HELD ON MONDAY, 20TH FEBRUARY, 2023, 7.00 - 8.10 PM

PRESENT: Councillor Barbara Blake (Chair), Councillor John Bevan, Councillor Nicola Bartlett (from item 7), Councillor Cathy Brennan, Councillor Lester Buxton, Councillor George Dunstall, Cllr Ajda Ovat, Councillor Matt White, and Councillor Alexandra Worrell (from item 7).

1. FILMING AT MEETINGS

The Chair referred to the notice of filming at meetings and this information was noted.

2. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor Luke Cawley-Harrison.

3. DECLARATIONS OF INTEREST

There were no declarations of interest.

4. URGENT BUSINESS

There were no items of urgent business.

5. DEPUTATIONS / PETITIONS / PRESENTATIONS / QUESTIONS

There were no deputations / petitions / presentations / questions.

6. MINUTES

It was noted that a list of actions arising from the previous meeting were included as an addendum. In relation to possible member site visits, some members suggested that it would be useful to visit a Greater London Authority scheme. The Chair noted this and commented some proposed site visits in Haringey were set out in the addendum.

RESOLVED

To confirm and sign the minutes of the Strategic Planning Committee meeting held on 20 October 2022 as a correct record.

At 7.05pm, Cllr Alexandra Worrell and Cllr Nicola Bartlett entered the meeting.

7. MEMBERSHIP

It was noted that, following the decision of the Full Council on 13 February 2023, Cllr Cathy Brennan was now a member of the Strategic Planning Committee in place of Cllr Yvonne Say. In accordance with the Committee's decision at the meeting on 23 May 2022, it was confirmed that this membership change would also apply to the Planning Sub-Committee.

The Chair expressed thanks to Cllr Say, on behalf of the Committee, for her work on the Strategic Planning Committee and Planning Sub-Committee and welcomed Cllr Brennan.

8. PLANNING AND BUILDING CONTROL 2022-23 - QUARTER 3 UPDATE

The Head of Development Management introduced the report which provided an update on the work of the Planning and Building Control Service for Quarter 3. It was stated that the number of planning applications had reduced slightly compared to 2021-22 and it was believed that these figures had returned to a more normal level following a surge after the Covid-19 pandemic. It was noted that performance in relation to appeals had improved slightly compared to 2021-22.

In relation to overall performance, it was noted that 100% of major applications had been processed in time. It was commented that 84% of minor applications had been processed in time which was a slight decline but was still above the national average; it was stated that there had been some delays caused by the transfer to the new planning system.

In relation to the performance indicators measured by the government, it was noted that the Council had not breached any of the thresholds. The end to end times for major applications had increased from 205 to 287 days but it was noted that all of these had been subject to planning performance agreements or time extensions due to the scale of the required legal agreements. For minor applications, the end to end times had also increased from 72 to 93 days but it was explained that work had been undertaken to clear older applications which could skew the figures. It was commented that the number of applications over 26 weeks was now approximately 170 and there would be a focus on reducing this number.

The Head of Development Management stated that there had been a slight reduction in the number of enforcement complaints compared to 2021-22. It was noted that some recent acknowledgement letters had been delayed slightly due to the implementation of the new planning system but that these cases were now being actioned in line with the normal timescales.

In relation to the new planning system, it was noted that there had been some changes compared to the previous system. In response to feedback received, some

enhancements had been made which included configuring the public portal to have more logical search options, providing more key information in search results, and keeping the option to comment open after the 21 day consultation period.

In response to questions from the Committee, it was noted:

- The Head of Development Management acknowledged that performance had been slightly impacted by the transfer to the new planning system. It was noted that overall statistics were measured over the financial year, from April to March, and it was believed that the figures from 2022-23 would be similar to previous years.
- In relation to resourcing, the Head of Development Management noted that officer case loads were broadly the same as 2021-22. For major applications, it was explained that officers were working to set deadlines, programme, and project manage to maximise timely processing.
- Some members noted that it could be helpful to provide the average time period to determine an application as a median which could avoid one case from skewing the result. The Head of Development Management commented that it should be possible to provide some additional numbers if members were interested in additional detail.
- In response to a question, it was commented that the shortest possible time for an application to be decided would be approximately three weeks to allow the 21 day statutory consultation period to take place. The Head of Development Management noted that it was aimed to complete fast track applications the week after the 21 day consultation period. It was also noted that the current average time to determine an application was 93 days.
- In relation to the implementation of the new planning system and the impact on enforcement, the Head of Development Management confirmed that work was underway to serve all the relevant notices. It was noted that a significant time period would need to pass before an issue was immune from enforcement action.

In relation to Planning Policy and Infrastructure, the Head of Policy, Transport, and Infrastructure Planning noted that the draft of the new Local Plan was underway. The evidence base which informed the Local Plan was being finalised. It was stated that the wider role of placemaking had been discussed with the member working group and would be embedded in the Local Plan. It was also noted that the government had launched a consultation on reforms to national planning policy and additional detail was presented later in the agenda.

In response to questions from the Committee, it was noted:

- In response to a question about avoiding demolition, the Head of Policy, Transport, and Infrastructure Planning commented that it was not possible to require that buildings were not demolished but noted that the new Local Plan would seek to incentivise sustainable development as much as possible.
- It was confirmed that the draft Local Plan would be presented to the Committee and that a special meeting could be organised if required.

In relation to Building Control, the Head of Building Control Services noted that fewer applications had been received this year compared to 2021-22. The Council's Building Control Team also had a reduced market share compared to previous years and it was explained that this was mainly due to increased private building control

applications in advance of the changes that would be introduced by the new Building Regulations. It was commented that the fees for the year appeared to be significantly lower but it was noted that a number of invoices had been delayed during the transition to the new planning system and it was anticipated that this figure would increase to a similar level as 2021-22. It was stated that the new system was being implemented which had taken some additional time but that the overall impact was positive; for example, it was commented that the new system now allowed officers to write case updates on site which had not been possible with the previous system.

The Head of Building Control Services also reported that there had been significant activity in relation to dangerous structures, particularly for out of hours call outs. It was noted that the Building Safety Act was currently being considered by Parliament. The publication of secondary legislation was expected imminently in advance of the proposed implementation of the new arrangements in October 2023. It was added that discussions were underway with Department for Levelling Up, Housing, and Communities (DLUHC) in relation to the proposed building safety levy that councils were expected to manage.

It was noted that the DLUHC had issued a circular in August 2022 which provided guidance on single staircases in tall, residential buildings. It was highlighted that, since then, the National Fire Chiefs Council had published a statement in December 2022 to note their view that the threshold for a requirement for more than one staircase should be 18 metres or seven storeys. It was added that, at the end of December 2022, the DLUHC had published a consultation on fire safety issues, including a suggestion that a second staircase may be required for residential buildings over 30 metres tall. Following this, in February 2023, the Mayor of London and Greater London Authority (GLA) had provided guidance which came into immediate effect and stated that all planning applications with residential buildings over 30 metres would require two staircases. It was commented that officers would continue to advise the Committee of any changes.

In response to questions from the Committee, it was noted:

- In relation to a query about existing residential buildings over 30 meters, the Head of Building Control Services noted that these would be identified as higher risk buildings and would most likely have a reduced time between risk assessments. It was stated that the government consultation emphasised that there was no evidence to suggest that existing tall buildings with a single staircase posed a life safety risk.
- It was enquired whether a lift would meet the requirements for a second staircase. The Head of Building Control Services explained that the consultation specified that a staircase was required but that, in Building Control terms, lifts and staircases were considered to be the same. It was noted that further clarification was expected.
- In response to a question about locally agreed requirements, the Assistant Director of Planning, Building Standards, and Sustainability clarified that Haringey was unlikely to set a local definition of tall buildings for fire safety purposes as it would be prudent to follow the guidance set by the GLA and London Fire Brigade. It was added that there was a higher concentration of tall buildings in London, compared to the national picture, and it was noted that the GLA and London Fire Brigade would be well placed to provide advice.

- Some members asked about the impact of a second staircase on affordable housing and viability. The Assistant Director of Planning, Building Standards, and Sustainability noted that this requirement was likely to have an impact as an additional staircase would use more space but it was highlighted that viability would always be scrutinised to maximise affordable housing. It was acknowledged that there would likely be a transitional period where the industry adapted to the new requirements.
- The Head of Building Control Services commented that the market share of the Council's Building Control Team could be influenced by a small number of applications. It was added that the Council's team still had a 41% market share for the year to date and that, as there were a large number of different inspectors, this would still constitute the majority share in the borough.
- It was explained that the new Building Regulations would remove the element of choice for buildings over 18 metres tall and applicants would be required to use a specified provider. It was noted that this was expected to impact the market and market share for buildings under 18 metres.
- In relation to the cost of works on dangerous structures, it was clarified that the Council only issued invoices where work was undertaken. If no work was undertaken, no charge was issued. It was explained that any works were undertaken by a contractor and the initial costs were paid by the Council; the charges were then invoiced to the building owner. It was noted that there were approximately four buildings that had required works so far in 2022-23.
- It was enquired whether the Building Control Team undertook any preventative works in relation to dangerous structures for known issues such as falling masonry. The Head of Building Control Services highlighted that it was always the responsibility of the building owner to undertake works but that, where there were known issues, the Building Control Team could bring this to building owners' attention. It was noted that, following the Covid-19 pandemic, the Building Control Team had issued some information to addresses where there were known issues; this had not resulted in many responses. It was noted that, if no action was taken, it was possible to serve dangerous structures notices which could be enforced through court action if required.
- It was noted that 30 metres was the equivalent of 10 storeys and 18 metres was the equivalent of seven storeys.
- In relation to apprenticeships, the Head of Building Control Services noted that two trainees had started working in the team on 20 February 2023.

RESOLVED

To note the report.

9. RECENT GOVERNMENT ANNOUNCEMENTS ON PLANNING

The Assistant Director of Planning, Building Standards, and Sustainability introduced the report which provided information and invited comment on the content of the Levelling-up and Regeneration Bill (LURB). It was noted that the deadline to respond to the consultation was 2 March 2023; the response would be signed off by the Cabinet Member for Housing Services, Private Renters, and Planning but comments from the Committee were welcomed.

The Head of Policy, Transport, and Infrastructure Planning highlighted that there were two key elements to the consultation: to seek views on the proposed changes to the National Planning Policy Framework (NPPF) and on the government's overall planning reforms for the longer term.

In relation to the NPPF, it was explained that there were important changes proposed to densities, which would encourage dense development in appropriate areas, to the requirement for local authorities to demonstrate a five year housing land supply, which would be removed, to the assessment of Local Plans, which was designed to be simpler, and to give energy efficiency more weight for non-domestic buildings.

In relation to longer term changes, it was explained that the government was proposing National Development Management Policies (NDMPs) which were intended to avoid the need for local authorities to repeat national policies in their Local Plans. It was noted that additional detail was due to be provided in a future consultation but that the proposed wider changes were set out in the report.

It was noted that officers were currently drafting a response and that the key points were set out in the report. In summary, there was support for the removal of the five year housing land supply requirement, the more proportionate approach to examining Local Plans, and the proposals for energy efficiency. Concerns were due to be expressed about the practicalities of considering applicants' past behaviour and about having NDMPs and how these would interact with Local Plans that involved local engagement and agreement. It was added that planning policy was currently a key issue and a number of further consultations were anticipated throughout the next few years.

In response to questions from the Committee, the following responses were provided:

- Some members expressed concerns about the proposals for 'Supplementary Plans' which would require examination and which would effectively void existing Supplementary Planning Documents (SPDs); it was considered that this would undermine a number of important, local protections. The Head of Policy, Transport, and Infrastructure Planning noted that these concerns would be included in the Council's response and it would be explained that SPDs which were reasonable and which had been through local consultation and agreement should be allowed to continue. It was commented that, although it would be resource intensive and would take some time, it would be possible to include some of the SPD protections in the Local Plan.
- In relation to the removal of the five year housing land supply requirement, it was stated that this would allow local authorities to give full weight to their Local Plans. It was explained that, if a Council could not continually demonstrate this, the Local Plan had reduced weight and a presumption in favour of sustainable development was applicable. This requirement was difficult to maintain, particularly in London where there was limited land available, and the removal of the requirement would allow local policies to be implemented more strongly. The Assistant Director of Planning, Building Standards, and Sustainability clarified that the Council would not reduce its ambition to deliver housing but that the proposals would remove the sanctions where it was not possible to meet targets.

- In relation to the consideration of an applicant's past behaviour, some members suggested that this could be a helpful consideration in some circumstances and it was enquired whether it was possible to request a more specific definition of what behaviour should be taken into account to avoid potential legal challenges. The Assistant Director of Planning, Building Standards, and Sustainability noted that officers' technical view was that this proposal would be too difficult to implement but it was acknowledged that the response could include a political view as well; this would be raised with the Cabinet Member. It was added that, in practice, it was believed that there would be ways for applicants to circumvent this ground and officers were sceptical that it could be delivered.

RESOLVED

To note the report.

10. NEW ITEMS OF URGENT BUSINESS

There were no items of urgent business.

CHAIR: Councillor Barbara Blake

Signed by Chair

Date

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MINUTES OF MEETING Strategic Planning Committee HELD ON Monday, 15th May, 2023, 8.30 pm

PRESENT:

Councillors: Barbara Blake (Chair), Reg Rice (Vice-Chair), Nicola Bartlett, Cathy Brennan, Scott Emery, Emine Ibrahim, Sue Jameson, Sean O'Donovan and Alexandra Worrell

1. FILMING AT MEETINGS

The Chair referred to the notice of filming at meetings and this information was noted.

2. APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor George Dunstall.

3. DECLARATIONS OF INTEREST

There were no declarations of interest.

4. URGENT BUSINESS

There were no items of urgent business.

5. DEPUTATIONS / PETITIONS / PRESENTATIONS / QUESTIONS

There were no deputations / petitions / presentations / questions.

6. ESTABLISHMENT OF THE PLANNING SUB-COMMITTEE 2023/24

The Committee considered the report which sought to establish a Planning Sub-Committee for the 2023/24 Municipal Year, including noting the terms of reference for the Planning Sub-Committee.

It was noted that the proposed membership of the Strategic Planning Committee for 2023-24 was decided at the Full Council meeting on 15 May 2023, immediately prior to this meeting of the Strategic Planning Committee. The proportional split of the Strategic Planning Committee was 10 Labour councillors and 1 Liberal Democrat councillor and the membership was: Councillor Barbara Blake (Chair), Councillor Reg Rice (Vice-Chair), and Councillors Nicola Bartlett, John Bevan, Cathy Brennan, George Dunstall, Scott Emery, Emine Ibrahim, Sue Jameson, Sean O'Donovan and Alexandra Worrell.

It was proposed that the Strategic Planning Committee agreed that the membership of the Planning Sub-Committee was the same as the Strategic Planning Committee. It

was highlighted that, should the membership change, the membership of the Planning Sub-Committee would continue to be the same as the Strategic Planning Committee.

RESOLVED

1. To note the terms of reference of the Strategic Planning Committee and Planning Sub-Committee as set out within the Council's Constitution, attached as Appendix 1 to the report.
2. To agree the establishment of a Planning Sub-Committee with the same membership as the Strategic Planning Committee.
3. To note the Strategic Planning Protocol as set out within the Council's constitution, attached as Appendix 2 to the report.

7. NEW ITEMS OF URGENT BUSINESS

There were no items of urgent business.

8. DATES OF FUTURE MEETINGS

To note the dates of future meetings:

- 20 June 2023
- 13 November 2023
- 19 February 2024

CHAIR: Councillor Barbara Blake

Signed by Chair

Date

Report for: Strategic Planning Committee 20 June 2023

Title: Planning and Building Control 2022/23 Update

Report authorised by: Rob Krzyszowski, Assistant Director, Planning, Building Standards & Sustainability

Lead Officer: Robbie McNaugher, Head of Development Management & Enforcement

Bryce Tudball, Interim Head of Planning Policy, Transport & Infrastructure

Bob McIver, Head of Building Control

Ward(s) affected: N/A

**Report for Key/
Non Key Decision:** For information

- 1. Describe the issue under consideration**
A report on the work of the Planning and Building Control services to March 2023.
- 2. Recommendations**
That this report be noted.
- 3. Reasons for decision**
Not applicable.
- 4. Alternative options considered**
This report is for noting and as such no alternative options were considered.
- 5. Planning and Building Control 2022/23 Update**

Development Management

Performance overview

- 5.1 An overview of performance is as follows. **Appendix One** explains the categories of applications.
- Applications received during 2022/23 (1st April – 31st March): **3,385**
 - Applications received during same period 2022/22: **3,527**
 - Number of cases on-hand end of March 2023: **725** (the transition to the new system means this figure is not fully accurate and likely to be higher)
 - Number of cases on-hand end of March 2022: **726**
 - Appeals decided during 2022/23 (1st April – 31st March): **97**
 - Appeals decided during same period 2021/22: **100**
 - Appeals dismissed (won) during 22/23 (1st April – 31st March): **75 (77%)**
 - Appeals dismissed (won) during same period 2021/22: **73 (73%)**
 - Cumulative performance (applications in time) 2022/23 (1st April – 31st March)
 - **Majors: 100%**
 - **Minors: 80%**
 - **Others: 87%**
 - **PS1 Only: 87%**
 - **Decisions excluded from statutory figures: 73%**
- 5.2 As set out above performance is at 100% for ‘Majors’ applications. Our performance for ‘Minor’ applications has declined slightly due to delays relating to the change to the new system at 80%. However given the resource it has taken to deliver the transition to a new database and associated delays to applications during this transition in October the figures are very positive. Appeal performance has also increased which is positive.

	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23
Majors	100%	100%	100%	100%	100%	100%	100%
Minors	88%	98%	98%	94%	95%	90%	80%
Others	90%	98%	98%	96%	97%	91%	87%
PS0/ PS1	86%	89%	90%	91%	91%	91%	87%
Exclude							73%
A.O.D.	68%	69%	86%	90%	91%	88%	79%

Cumulative Performance (April-March from 2016/17 onwards)

Note: As of 2022/23 ‘PS1’ and ‘Exclude’ figures are reported separately within the new Arcus system. Prior to that both PS1 and Exclude were reported as a single return under ‘PS0’

- 5.3 The Government has three measures of application performance which the Council must remain within thresholds for. If we breach these thresholds we may be designated as a poorly performing planning authority and developers will then have the option of applying directly to the Planning Inspectorate for planning permission. This would mean that we don’t get the fee income for that application but we are still required to undertake the consultation. In addition we

lose the democratic right to determine the application. These are (assessed over a two-year rolling period):

- Majors applications performance at least 50%
- Minor and Other applications performance at least 70%
- Appeals lost (below 10% in both categories)

5.4 For 2022/23 we have decided the following:

- **16 ‘Major’** applications (compared to the 15 during the same period last year)
- The average time of decision has increased from 257 to 268 days but all have been subject to planning performance agreements or extensions of time due to the need for S106 agreements on applications of this scale.

	18/19	19/20	20/21	21/22	22/23
No. of Major Apps decided	27	19	20	15	16

Major applications decided over past five years

- **361 ‘Minor’** applications (compared to the 339 ‘Minor’ applications last year)
- The average decision time has increased from 89 days to 126 days
- **1,204 ‘Other’** applications (compared to the 1,245 ‘Other’ applications last year)
- The average decision time has increased from 72 days to 93 days (a result of delays in October and efforts to clear some backlog applications)

	Average Days to Decision	Median Days to Decision
Major	268	266
Minor	126	71
Other	93	63
PS1 only	58	56
Exclude	103	69

Average and Median days to decision 22/23

	Average Days to Decision	Median Days to Decision
Major	257	205
Minor	89	56
Other	72	56
PS1 only	48	43
Exclude	78	55

Average and Median days to decision 21/22

5.5 The length of time taken to validate an application is at an average of 35 days, increased from 15 days due to the delays during the transition to the new system.

5.6 The end to end times and the overall numbers of applications received, approved, and refused over previous years is set out below. Reducing the current backlog may continue to increase end to end times:

	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023
Received	3574	3094	3308	3375	3385
Approved	2963 (89%)	2576 (89%)	2590 (85%)	2535 (84%)	2533 (88%)
Refused	356 (11%)	314 (11%)	475 (15%)	499 (16%)	333 (12%)
Total decided	3,319	2,890	3,065	3,034	2866

- 5.7 Officer caseloads are at around 63 per officer in Q4 of 2022/23 financial year, which is a decrease from 65 last year.
- 5.8 The number of on hand applications has decreased compared to this time last year. As of the end of April 2023, there were 759 pending valid applications (down from 774 on this time last year). However this figure is still not wholly accurate as the transition to the new system means some applications may not be recorded as live 'on hand' applications. There is also a substantial number of applications not yet validated or registered and the new system allows for greater monitoring of this figure which is currently 201 'new' applications. Giving a total of 960 pending planning applications. This backlog of applications is a concern and has accumulated due to the implementation of the new system and recruitment delays leading to staff shortages. There is now a significant effort to address this and reduce this figure following recent recruitment.
- 5.9 The number of applications over 26 weeks is now at around 313. Many of these cases are complex or awaiting section 106 sign off or approval of details applications for major developments requiring detailed discussions with consultees but many are due to the current backlog. With new staff in place significant efforts can now be made to reduce this.

Pre-application advice

- 5.10 During 2022/23 there have been:
- 146 pre-application meetings (same period last year: 157) generating a total of £259,486 in income (same period last year: £271,775)
 - 88 householder pre-application meetings (same period last year: 123) generating £34,695 in income compared to (same period last year: £43,525)
- 5.11 The use of Planning Performance Agreements (PPAs) during 2022/23 has generated £638,013 in income, compared to £788,000 last year.
- 5.12 Express householder written advice, fast-track certificate of lawfulness and new fast-track application services have proved popular with customers whilst increasing income for the service. In 2022/23 we have received:
- 40 instances of Express Pre-applications generating a total of £10,964.00.
 - 17 instances of Fast Track Certificate of Lawfulness applications generating a total of £12,992.20.

- 12 instances of Fast Track Householder applications generating a total of £8,472.

Planning Decisions

- 5.13 The final government threshold relates to overturns of refusals (officer and committee) on applications on appeal. We are at 1% on minor / other applications.
- 5.14 For major applications the measure for quality of planning decisions is the percentage of the total number of decisions made that are then subsequently overturned at appeal, once nine months have elapsed following the end of the assessment period.
- 5.15 The nine months specified in the measure enables appeals to pass through the system and be decided for the majority of decisions on planning applications made during the assessment period. The assessment period for this measure is the two years up to and including the most recent quarter for which data on planning application decisions are available at the time of designation, once the nine months to be allowed for beyond the end of the assessment period is taken into account. The average percentage figure for the assessment period as a whole is used.
- 5.16 The threshold for designation on applications for both major and non-major development, is 10% of the total number of decisions on applications made during the assessment period being overturned at appeal. This is calculated as an average over the assessment period.
- 5.17 The Department for Levelling Up, Housing and Communities has confirmed that we have avoided designation this period (2019-21) achieving a figure of 2.7%.
- 5.18 For the next designation period (2020-22) we do not expect to breach the threshold with the figure currently at 5.7% with no further major appeals pending.
- 5.19 Haringey's performance for 2019/21 and 2020/22 is as follows:

Type of application	Number of apps	Number of overturns	% (Threshold 10%)
Majors 19/21	37	1	2.7%
Majors 20/22	35	2	5.7%

- 5.20 The results of the government's own figures are due to be published in June.
- 5.21 As set out below the government has recently consulted on further performance measures looking more widely at quantitative and qualitative performance. Proposed measures including reducing the Planning Guarantee time from 26 to 16 weeks for non-major applications, measuring average speed of decision making, validation times, use of extensions of time and planning enforcement performance and potentially customer feedback. They have indicated that there

would be grace period to allow the associated increase in planning fee income to enhance performance before these measures will be put in place.

Planning Enforcement

- Enforcement complaints received during 2022/23: 519 compared to the 589 Enforcement complaints received last year.
 - Enforcement notices served during 2022/23: The transition to the new system means figures may be inaccurate but indicate 28 compared to the 55 Enforcement notices served during the same period last year.
- 5.22 Of the complaints 51% were acknowledged within one working day of receipt. This measure is down from 66% last year, as a result of the implementation of the new system which led to complaints being held for 3 weeks before being added to the new system once it was operational. The Planning Enforcement Team has a target to make a decision on all enforcement complaints within 8 weeks. Performance for 2022/23 is 97% compared to 99% last year.
- 5.23 The Planning Enforcement Team continues to seek prosecutions against owners who have failed to comply with existing enforcement notices. In addition to the prosecution proceedings, there has been a concerted effort in securing confiscation sentences under the provisions of the Proceeds of Crime Act (POCA) 2002. There are a number of prosecutions that are still going through the courts (these take a significant length of time) including a recent POCA that was deferred in November until June 2023.
- 5.24 Officers are working with colleagues in other departments to explore bringing Financial Investigation Services in house to increase the proportion of income received from confiscation orders.
- 5.25 The Planning Enforcement Team has appointed Anthony Fenner to the vacant Deputy Team Manager role and will shortly backfill the vacant post vacated by Anthony.

Member Training & Site Visits

- 5.26 Member site visits have taken place visiting Clarendon in Wood Green, Tottenham Hale and Woodbury Down and Kings Crescent in LB Hackney and more recently The Harringay Warehouse District, Haringey Design Award overall winner the Green House, completed Argent Related developments in Tottenham Hale and The Tottenham Hotspur Stadium. Future training on viability will be provided. Officers are looking at options for future site visits which include; recently completed Council Housing projects including Rosa Luxembourg House and officers would welcome Cllrs' views on other options or priorities.

Responses to Government consultations

5.27 The service has responded to Government consultations as follows:

Consultation	Hyperlink	Start date	End date	Haringey response
Technical Consultation: Stronger performance of Local Planning Authorities supported through an increase in planning fees	www.gov.uk/government/consultations/increasing-planning-fees-and-performance-technical-consultation/technical-consultation-stronger-performance-of-local-planning-authorities-supported-through-an-increase-in-planning-fees	28 February 2023	25 April 2023	Response submitted on 25 April 2023 – see Appendix Two

Planning Policy & Infrastructure

New Local Plan

5.28 The timetable for preparing the New Local Plan is set out in the table below.

Document	Regulation	Date
New Local Plan First Steps Engagement consultation	Reg 18	November 2020-February 2021
Draft Local Plan consultation	Reg 18	Autumn 2023
Proposed Submission Local Plan consultation	Reg 19	Spring 2024
Submission & Examination	Reg 22-25	2024
Adoption	Reg 26	2024

5.29 In line with national policy and guidance the New Local Plan must be informed and supported by a relevant and up-to-date evidence base that is adequate and proportionate.

5.30 Two key pieces of evidence have recently been concluded which will help inform the Draft Local Plan. These are:

- **Towards Net Zero Carbon Study** – this was commissioned by Haringey on behalf of 19 London Boroughs, updates the Cost of Carbon Study prepared in 2020, provides robust evidence on available approaches to secure design and construction of zero carbon buildings, and recommends the best policy methods to deliver this.
- **Haringey Tall Buildings Study** – this was prepared in-house and consistent with the requirements of the London Plan it provides a definition of tall buildings in a Haringey context and identifies appropriate locations within the borough for tall buildings.

5.31 Further evidence is currently underway as follows:

- **Affordable Workspace Viability Testing** – a detailed assessment of the viability of affordable workspace in the borough
- **Infrastructure Delivery Plan (IDP)** - a data-led/digitally focused IDP has been commissioned and is scheduled for completion in Autumn 2023. The purpose of the IDP is to help ensure that the right strategic and local infrastructure provision is planned for to meet the needs of the borough's residents and businesses and to make Haringey's places sustainable, resilient and successful. It is being prepared in a genuinely collaborative way in partnership with a range of internal and external stakeholders with circa 15 stakeholder interviews completed to date.

5.32 The drafting of the **Draft Local Plan** is currently at an advanced stage with a focus on **embedding placemaking throughout the document**. The current focus of drafting is on placemaking strategies for the borough's neighbourhoods. The Draft Local Plan will break the borough down into circa 10 to 12 neighbourhoods with each of these having a place-specific vision and

objectives and identifying clearly how new development and buildings within the neighbourhood can and should contribute to this.

- 5.33 Approval to consult will be sought from Cabinet later in 2023 with the New Local Plan Member Working Group and Strategic Planning Committee both consulted in advance of this. At the same time key evidence base documents will be published together with a comprehensive Consultation Report setting out the feedback received from the community and other stakeholders as part of the First Steps Engagement.

Other planning policy workstreams

- 5.34 In April 2023 the **Highgate Neighbourhood Forum (HNF)** applied to Haringey and Camden Councils to be formally re-designated as a neighbourhood forum. Haringey and Camden Councils first approved the designation of the Highgate Neighbourhood Area and the HNF in 2012. Neighbourhood Forum designations expire after 5 years after which a Forum is required to be re-designated. The HNF's designation first expired in 2017 but following a successful re-designation application the HNF was re-designated in 2018. As a further 5 years have elapsed the HNF must now apply to be re-designated again and the HNF has applied to the Council to be formally re-designated as a neighbourhood forum.
- 5.35 The Councils are currently seeking comments on whether the HNF is appropriate to be re-designated. Requirements to be designated are set out in section 61F(5) of the Town and Country Planning Act 1990. Consultation in this regard began on 4 May 2023 and runs until 23 June 2023.
- 5.36 If the application is agreed by the Councils, the Highgate Neighbourhood Forum will be able to make modifications to the adopted Highgate Neighbourhood Plan or prepare a replacement Plan. Camden and Haringey Councils adopted the current Highgate Neighbourhood Plan in 2017.

Responses to Government consultations

5.37 The service has responded to Government consultations as follows:

Consultation	Hyperlink	Start date	End date	Haringey response
Levelling Up & Regeneration Bill: Reforms to national planning policy	www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy	22 December 2022	2 March 2023	Item at Strategic Planning Committee on 20 February 2023 Response submitted on 2 March 2023 – see Appendix Three
National Planning Policy Framework: draft text for consultation	www.gov.uk/government/consultations/levelling-up-and-regeneration-bill-reforms-to-national-planning-policy	22 December 2022	2 March 2023	
Permitted development rights: supporting temporary recreational campsites, renewable energy and film-making	www.gov.uk/government/consultations/permitted-development-rights-supporting-temporary-recreational-campsites-renewable-energy-and-film-making-consultation	28 February 2023	25 April 2023	No response
Technical consultation on the Infrastructure Levy	www.gov.uk/government/consultations/technical-consultation-on-the-infrastructure-levy	17 March 2023	9 June 2023	No response
Environmental Outcomes Reports: a new approach to environmental assessment	www.gov.uk/government/consultations/environmental-outcomes-reports-a-new-approach-to-environmental-assessment	17 March 2023	9 June 2023	No response
High Street Rental Auctions	www.gov.uk/government/consultations/high-street-rental-auctions	31 March 2023	23 June 2023	TBC – Regeneration service lead
Introduction of a use class for short term lets and	www.gov.uk/government/consultations/introduction-of-a-use-class-for-short-term-lets	12 April 2023	7 June 2023	No response

associated permitted development rights	<u>lets-and-associated-permitted-development-rights</u>			
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Building Control

Performance Overview

5.38 The applications to date this year are slightly below previous years , however our market share has decreased as a result of private building control submitting significant applications prior to the new Building Regulations in June, in order to take advantage of the transitional period. Building Control have received a significant number of new housing schemes and continue to work on the majority of high schemes within the Borough. The fee income figure whilst lower than last year recovered well in the last quarter and is at the expected/forecast figure.

Building Control	2018/19	2019/20	2020/21	2021/22	2020/23
Applications	1996	2323	1717	2645	2069
Fees	604k	600k	561k	766k	698k
Site visits	6817	6278	5603	6243	5674
Market share	54%	62%	53%	57%	40%
Dangerous Structures	190	162	159	225	204
Demolition Notices	13	29	20	18	22

Dangerous structures

5.39 There have been 204 dangerous structures over the year, including a number of significant out of hours call outs where we had to call out our dangerous structure contractor to remove the danger, one of which involved the demolition of an entire building. It should be noted that where we request the help of our dangerous structure contractor, there is a cost attached to this that initially comes out of Building Control's budget until we can invoice the owner.

Building Act & Fire Safety

5.40 The Government continues to release various consultation documents relating to the Building Safety Act and the secondary legislation that will provide the detailed timescales

5.41 A national survey concluded that a lack of resources to get the job done to the right level of quality meant that often training and development wasn't able to be accessed due to this lack of time. This was exacerbated by the volume of work which was often "overwhelming." Like many employees, respondents said the cost-of-living crisis was impacting their mental health as their pay was failing to keep pace with inflation. A combination of these factors, coupled with higher salaries and more benefits such as cars and private healthcare offered by the private Building Control bodies were causing a crisis in retention which must be addressed if Local Authorities are to meet their responsibilities under the

Building Safety Regulator. Haringey Building Control is about to experience this first hand, as one of our experienced and highly regarded surveyors has decided to take early retirement after 38 years in the team.

- 5.42 We have also met with DLUHC officers to discuss the proposal for Building Control to collect the proposed Building Safety Levy on behalf of the Government. This is still at an early stage, however it has been very useful in trying to guide their thinking.

6. Contribution to strategic outcomes

- 6.1 The Planning and Building Control services contribute to the Corporate Delivery Plan's focus on tackling inequality, climate justice and health across all of the various themes.

7. Local Government (Access to Information) Act 1985

Planning Applications are on the Planning Register on the Council's website and the Local Plan documents are also on the Council's website.

Appendices

Appendix One – Definitions of Categories of Development

Appendix Two – Haringey Response to Government consultation: Technical Consultation: Stronger performance of Local Planning Authorities supported through an increase in planning fees

Appendix Three – Haringey Response to Government consultation: National Planning Policy Framework: draft text for consultation & Levelling Up & Regeneration Bill

APPENDIX ONE
Definitions of Categories of Development

Major Development

- 10+ dwellings / over half a hectare / building(s) exceeds 1000m²
- Office / light industrial - 1000+ m² / 1+ hectare
- General industrial - 1000+ m² / 1+ hectare
- Retail - 1000+ m²/ 1+ hectare
- Gypsy/traveller site - 10+ pitches
- Site area exceeds 1 hectare

Minor Development

- 1-9 dwellings (unless floorspace exceeds 1000m² / under half a hectare)
- Office / light industrial - up to 999 m²/ under 1 hectare
- General industrial - up to 999 m²/ under 1 Hectare
- Retail - up to 999 m²/ under 1 hectare
- Gypsy/traveller site - 0-9 pitches

Other Development

- Householder applications
- Change of use (no operational development)
- Adverts
- Listed building extensions / alterations
- Listed building demolition
- Application for relevant demolition of an unlisted building within a Conservation Area
- Certificates of Lawfulness (191 and 192)
- Notifications
- Permissions in Principle (PiP) and Technical Detail Consent (TDC)

APPENDIX TWO

Haringey Response to Government consultation:

Technical Consultation: Stronger performance of Local Planning Authorities supported through an increase in planning fees

APPENDIX THREE

Haringey Response to Government consultation:

**Levelling Up & Regeneration Bill: Reforms to national planning policy
& National Planning Policy Framework: draft text for consultation**

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Sent by email to

PlanningFeesPerformanceConsultation2023@levellingup.gov.uk

Technical consultation: Stronger performance of local planning authorities supported through an increase in planning fees

Thank you for the opportunity to respond to the consultation on the stronger performance of local planning authorities supported through an increase in planning fees.

London Borough of Haringey

Haringey's Planning Service has been on a journey of continuous improvement from being designated as one of the worst performing in 2013 to one of the best in terms of Development Management and Planning Enforcement culminating in being Highly Commended in the category of Planning Team of the Year at the Planning Awards in 2018 and a Local Government Chronicle awards finalist in 2020. However maintaining this level of performance has been a challenge as statutory planning income has not increased whilst costs, funding challenges and performance measures have.

Additional fee income and ringfencing

Despite significantly increasing discretionary income the service's budget is under severe pressure and this inevitably affects our ability to rapidly deliver high quality development that is appropriate for Haringey. As such the recognition of the need to increase and ring fence planning funding is welcome to allow Haringey to continue to invest in our service, ensure continued engagement with communities and deliver transformative development.

Whilst the increases proposed are welcome they do not go far enough and fee increases should provide full cost recovery including the costs of delivering Local Plans and other planning policy statutory responsibilities.

Furthermore implementing the level of change expected in the Levelling Up and Regeneration Bill and emerging new National Planning Policy Framework (NPPF) will require significant additional resource to implement new initiatives such as assessing the track record of delivery of developers.

Discretionary and bespoke planning services

Haringey has maximised discretionary services to raise income and already provides fast track services for simple applications and through Planning Performance Agreements (PPAs) to allow developments to be determined within desired timescales.

Local planning authority capacity and capability

Recruiting and retaining staff can be a challenge so Haringey has consistently sought out graduates to increase staffing numbers and achieve good value for money. There are a surprising number of capable people with planning degrees who have been unable to enter the profession and more needs to be done centrally to attract graduates into LPA roles. This will in turn increase the diversity of people in planning roles.

Further resources are needed to allow Planning Teams to increase skills in community engagement, sustainability, design and ecology ahead of biodiversity net gain.

Local planning authority performance

There is already too great a focus on quantitative measures and not enough focus on the quality of outcomes for customers and residents. Haringey's current planning application feedback survey provides a template for a national feedback survey.

As one of the top performing enforcement teams in the country Haringey would welcome a greater focus on planning enforcement performance which will highlight the quality of work carried out by this team.

Conclusion

Whilst it is positive that resource and capability challenges have been recognised and steps taken to address this, they do not go far enough and there must be a greater focus on the quality of outcomes for customers and on the ground.

With greater central support Haringey could lead on increasing the number of people entering the profession as well as the diversity of the planning profession.

The Council broadly welcomes the suite of proposals put forward by the Government, subject to the caveats listed.

Please find the Council's responses to the individual questions on the following pages.

Should you require further information or clarification. Please contact Robbie McNaugher Head of Development Management and Planning Enforcement.

Yours faithfully



Cllr Dana Carlin
Cabinet Member for Housing Services, Private Renters and Planning

Question 1. Do you agree that fees for planning applications should be increased by 35% for major applications?

Yes. However Haringey would like to see further increases to achieve full cost recovery for Development Management Planning Enforcement and Local Plan preparation.

Question 2. Do you agree that the fee for householder planning applications should be increased by 25%?

Yes. However Haringey would like to see further increases to achieve full cost recovery for Development Management Planning Enforcement and Local Plan preparation.

Question 3. Do you agree that fees for all other planning applications should be increased by 25%? If not, please include in the comments box the particular application types where you believe the proposed increase is too high or too low. Your comments should be accompanied with evidence/costs if possible.

Yes. However Haringey would like to see further increases to achieve full cost recovery for Development Management Planning Enforcement and Local Plan preparation.

We note that DLUHC intends to introduce a new fee structure for the variation of planning permissions to take account of the proposed new route to make minor variations to permissions in the Levelling Up and Regeneration Bill once the provisions come into force which is welcome.

Question 4. Are there any other application types or planning services which are not currently charged for but should require a fee or for which the current fee level or structure is inadequate?

Yes, for works to trees in Conservation Areas, works to Tree Preservation Order (TPO) Trees and Listed Building Consents, a fee should be payable for each condition discharge submission rather than paid per batch of conditions. Requests for amendments to S106 agreements can be costly and do not attract a fee. There should be provision to charge for changes made that require re-consultation to encourage proactive engagement and costs recovery.

Discretionary and bespoke planning services

Question 5. Please can you provide examples of bespoke or 'fast track' services which have worked well or you think could be introduced for an additional fee? Are there any schemes that have been particularly effective?

Haringey has been providing fast-track services for a number of years generating several thousand pounds of additional income each year. We charge £500 for a decision within 2 weeks for certificates of lawfulness for proposed development and the same for a householder planning application within 6 weeks. We have just introduced the same service for prior approval for larger household extensions.

We also have used PPAs to provide faster decisions on major, minor and approval of detail applications. The response from customers have been very positive and it has allowed the team to work proactively with applicants to meet their timescales for a decision, whilst not prejudicing that decision.

Indexation

Question 6. Do you agree with the proposal for all planning fees to be adjusted annually in line with inflation?

Yes

Ringfencing of additional fee income

Question 7. Do you consider that the additional income arising from the proposed fee increase should be ringfenced for spending within the local authority planning department?

Yes, with expectations of greater performance, fees must be ringfenced.

Fees for retrospective applications

Question 8. Do you agree that the fee for retrospective applications should be doubled, i.e. increased by 100%, for all applications except for householder applications?

Yes this is appropriate for non-householder applications. It may make it more difficult to resolve enforcement complaints where a retrospective application would resolve a breach of permission. A strengthening in the appeal costs regime to indicate that where an applicant has chosen to appeal a notice rather than submit a retrospective application and the appeal is dismissed they are liable for costs and the retrospective fee would avoid this unintended consequence.

Removal of the 'free-go' for repeat applications

Question 9. Do you consider that the ability for a 'free-go' for repeat applications should be either:

- (a) removed ✓
- (b) reduced for re-applications within 12 months
- (c) retained
- (d) none of the above
- (e) don't know

Whilst there is a risk this will increase refusal rates and it will become more efficient to refuse applications, with appropriate qualitative performance measures in place such as measuring the % of refusals for LPAs this unintended consequence should be avoided.

This will encourage applicants to undertake pre-application engagement and front-load discussions on applications. The current free-go provisions

Introduction of a prior approval fee for the permitted development right allowing development by the Crown on a closed defence site

Question 10. Do you agree that a fee of £96 (or £120 if the proposed fee increase comes forward) should be charged for any prior approval application for development by the Crown on a closed defence site?

No comment

Local planning authority capacity and capability

Increasing resources in the planning system - Supporting the resilience, capacity and capability of local planning authorities

Question 11. What do you consider to be the greatest skills and expertise gaps within local planning authorities?

Community engagement, sustainability, design, transport, landscape design and ecology / biodiversity net gain.

Question 12. In addition to increasing planning fees, in what other ways could the Government support greater capacity and capability within local planning departments and pathways into the profession?

A centralised work experience and graduate placement programme in conjunction with the private sector. With funding support and a standardised training programme this would reduce the burden on LPAs while opening pathways in planning. Too many private sector planners have no experience of the realities and politics of local government it would be mutually beneficial for LPAs to provide graduate placement for future planners across all sectors. The current National Graduate Development Programme scheme provides a template for this.

Haringey has provided a large number of placements and graduate roles. These have largely been placed through word of mouth or contact with Universities and found a surprising number of graduates drifting away from the profession due to lack of opportunities. Taking on these new recruits has been beneficial by bringing in new voices to the team but it can be time consuming to embed basic training.

Question 13. How do you suggest we encourage people from under-represented groups, including women and ethnic minority groups, to become planning professionals?

Outreach to local schools and universities. Haringey is a diverse borough and is proud of the diversity of the area. There is a shocking number of students with an interest in the built and natural environment who are not aware of the planning profession. LPA resources are scarce so there needs to be a funding incentive and further support from professional bodies for LPAs to engage with local schools that target those studying geography or interested in climate change.

Local planning authority performance

Improving the performance of local planning authorities - Our ambition for a high-quality planning service.

Tightening the Planning Guarantee

Question 14. Do you agree that the Planning Guarantee should better mirror the statutory determination period for a planning application and be set at 16 weeks for non-major applications and retained at 26 weeks for major applications?

No, the planning guarantee is drain on LPA resources with applicants able to seek a refund of their fee even when a positive decision has been reached following discussion and amendments, reducing this time will encourage negative decisions on applications.

The regulations also require further improvement to clarify the position if an Extension of Time (EOT) is agreed but a decision not made within this time and a period after which the fee cannot be refunded to allow LPAs to control their budget.

Extension of time agreements and Planning Performance Agreements

Question 15. Do you agree that the performance of local planning authorities for speed of decision-making should be assessed on the percentage of applications that are determined within the statutory determination period i.e. excluding extension of times and Planning Performance Agreements?

No unless a 'stop the clock' provision is put in place to allow for amendments and negotiation with applicants to turn unacceptable proposals into acceptable proposals. LPAs with the highest performance figures often have higher refusal rates. So removing EOTs will lead to a greater number of refusals, delaying housing development.

Question 16. Do you agree that performance should be assessed separately for

- (a) Major applications - Yes**
- (b) Non-Major applications (excluding householder applications) - Yes**
- (c) Householder applications - Yes**
- (d) Discharge of conditions - Yes**
- (e) County matters applications - N/A**

Yes, these assessments seem fair.

Broadening the planning performance framework

Metric Measurement

A. Average Speed of decision-making

1. Average time taken to determine majors (inc. Extension of Time (EoT) and Planning Performance Agreements (PPAs))
2. Average time taken to determine non-majors (inc. EoT and PPAs)
3. Average time taken to determine householders (inc. EoT and PPAs)
4. Average time taken to determine discharge of conditions (inc. EoT and PPAs)
5. Average time taken to determine county matters (inc. EoT and PPAs)

B. Quality of decision-making

1. Major appeals allowed by Planning Inspectorate as percentage of all appeal decisions.
2. Non-major appeals allowed by Planning Inspectorate as percentage of all appeal decisions.
3. Householder appeals allowed by the Planning Inspectorate as percentage of all appeal decisions

C. Extension of Times

1. Total number of EoTs as percentage of all decisions majors
2. Total number of EoTs as percentage of all decisions non-majors
3. Total number of EoTs as percentage of all decisions householders

D. Backlog

1. Average time taken to validate planning applications
2. Total number of cases beyond the Planning Guarantee period (currently 26 weeks for all applications but proposed to change to 16 weeks for non-major applications)

E. Planning Enforcement

1. Average number of weeks taken to respond to suspected breaches of planning and determine the appropriate course of action.
2. Average number of weeks to take action where a breach of planning has occurred, having decided it is expedient to do so.
3. Total number of cases over 6 months old as percentage of all open cases.

F. Planning Committee

1. Percentage of delegated decisions and committee decisions
2. Percentage of committee decisions to refuse against officer recommendation that are subsequently allowed at appeal

Question 17. Do you consider that any of the proposed quantitative metrics should not be included?

Yes. Average determination periods, total number of EOTs and time take to validate applications.

Whilst Haringey already measures average decision times to assess our own performance, these figures can be skewed by a small number of outlying decisions where often the applicant can be slow to respond. To avoid such outliers LPAs will be encouraged to refuse such applications where the applicant is not engaging. Completing S106 on Major applications can take a prolonged period of time through no fault of the LPA.

Extensions of time enable amendments to be sought and avoid refusals on unacceptable applications so measuring the use of EOTs will be unfair on proactive LPAs. Using the number of EOTs as measure of performance would only be appropriate if the reason is also recorded.

Unless a 'stop the clock' procedure is put in place as suggested above these figures can be an unfair assessment of LPAs' performance particularly where they seek to work to find solutions and resolve outstanding issues for positive outcomes.

Haringey's approach to validation is to combine this with an initial review of the proposal by a planning officer which results in longer periods for validation but still achieves statutory deadlines. Measuring validation times would be an unfair assessment of Haringey performance.

Haringey already measures planning enforcement performance so would support the introduction of such measures to highlight our good performance. However measure E3 can be outside of LPAs' control if a remedy has been sought or a notice served so must include a measure of whether formal action has been taken or an appeal submitted.

Haringey has an appropriate level of delegated decisions so would support such measures to indicate the efficiency of our service relative to others in the country.

Question 18. Are there any quantitative metrics that have not been included that should be?

No, there are already too many quantitative metrics when there should be a great focus on qualitative outcomes which measure customer experience and delivery on the ground.

If the 'free go' is removed rates of refusal should be measured.

Measuring customer experience

Question 19. Do you support the introduction of a qualitative metric that measures customer experience?

Yes. Striving to meet targets can negatively impact on customer service. LPAs with the highest performance figures often have higher refusal rates. Haringey's focus is on a positive customer experience which also provides high quantitative and qualitative performance levels and is more efficient by avoiding refusals and customer complaints whilst ensuring high quality development through early engagement. This is the model for how to ensure stronger performance from LPAs and should be better reflected in performance measures.

Question 20. What do you consider would be the best metric(s) for measuring customer experience?

A standardised customer experience questionnaire would provide for a fair comparison of LPA customer experience across the country. Haringey has 7 questions it asks which could be a template for such a national questionnaire.

1. How quickly did the planning officer make contact with you to discuss your application?

Very quickly

Quickly

Neither quickly nor slowly

Slowly

Officer did not make contact

2. Please let us know how much you agree or disagree with the following statements:

I felt well informed about how my application would be dealt with

I received clear advice about the reasons for the decision or recommendation on my application

My application was dealt with promptly

3. If you answered disagree or disagree strongly to Q2 please can you explain why?

4. Putting aside the outcome, how satisfied are you overall with how we dealt with your application?

5. If you answered dissatisfied or very dissatisfied to Q4 please can you explain why?
6. What is the reference number of your planning application? If you prefer you do not have to answer this question but it will be very helpful to us in improving the service if you do
7. Finally, do you have any comments about the service or ideas about we can improve it?

However it is key that customer experience looks at end to end processes from when the applicant first submits a valid planning application to when they receive a decision for their development whether that be the first, second or third planning application and when all pre-commencement conditions are discharged. If the standard planning application form could record links between applications and record this information it would give a better picture of how customer friendly LPAs' planning processes are.

Question 21. Are there any other ways in which the performance of local planning authorities or level of community engagement could be improved?

There is a range of good practice taking place in local authorities to use technology to reach a wider audience but there needs to be a great sharing of resources to make best practice standard practice.

Haringey has recently won a RTPI Award for Planning Excellence 2022 for its Local Plan Engagement with the judges noting the ability to roll out this approach across the country to improve the diversity of responses.

Haringey has also created a bespoke notification system within our website to notify neighbours of planning applications within their area.

Public Sector Equality Duty

Question 22. Do you have any views on the implications of the proposals in this consultation for you, or the group or business you represent, and on anyone with a relevant protected characteristic? If so, please explain who, which groups, including those with protected characteristics, or which businesses may be impacted and how. Is there anything that could be done to mitigate any impact.

No, fee exemptions would still apply to people seeking to modify their home to meet their accessibility needs.

Planning Policy, Transport & Infrastructure

Cllr Dana Carlin Cabinet Member for Housing Services, Private Renters and Planning



Planning Policy Consultation Team
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National Planning Policy Framework text consultation and Levelling Up and Regeneration Bill reforms to national planning policy

Thank you for the opportunity to respond to the consultation on the Levelling-up and Regeneration Bill: reforms to national planning policy.

London Borough of Haringey

Haringey is fantastic – the world in one borough. A place brimming with creativity, personality, radicalism, diversity and community. It is a place where we stand up for each other. A place that is proudly distinctive.

In 2020 the Council began the process of preparing a New Local Plan which will replace the existing Local Plan documents adopted in July 2017. This will show a long-term vision for development and change in Haringey and act as a key tool to address major challenges such as the climate emergency, housing and equity. The New Local Plan is being underpinned by a Council-wide placemaking approach which:

- empowers residents and stakeholders to shape places that enable everyone to reach their potential;
- meets diverse needs and ambitions to deliver a fairer, healthier, greener Haringey; and
- enhances and celebrates our unique environments, histories, cultures, and identities.

In November 2022 the Council launched the Haringey Deal which changed the way that the Council works – listening better, sharing power, and drawing on the passion and expertise of our communities. It sets out our ambition to listen and prioritise the relationships, to focus on what's strong, not what is wrong, to learn from our mistakes, to create space for good things to happen, and to work harder to hear the voices that are too often overlooked. The New Local Plan is therefore being guided by the people who live in Haringey, retaining a strong local influence over large scale, longer-term change, as well the everyday things which influence our quality of life so much, and ensuring that placemaking benefits existing communities.

Housing land supply

The Council welcomes the proposed removal of the five-year housing land supply requirement where a LPA's strategic policies are less than five years old. Haringey is located within Greater London and is therefore subject to the strategic policies in the Mayor of London's statutory spatial development strategy ("the London Plan") which have equal weight to local plan policies. There would be merit in the

Government confirming within the NPPF or associated PPG that for the purpose of housing land supply strategic policies include those within adopted spatial development strategies.

Soundness test

We support the proposal for a more proportionate approach to the examination of plans which we consider to be pragmatic and likely to support a more streamlined and efficient plan-making process. Notwithstanding this, we note and support that local plans will still need to be evidence-based. It is important, however, that the Government provides robust guidance on the types of evidence which will be required to inform and support local plans.

Planning conditions

Haringey already requires detailed drawings and material details as a condition prior to works commencing. We welcome the NPPF being updated to reflect that such detail is necessary which will help LPAs in ensuring high quality design.

Mansard roof extensions

The Council disagrees with the proposed changes on mansard roof extensions and would emphasise that simple forms of rooftop extension (authentic mansard, dormer or set-back floor) are sometimes not possible/appropriate and can represent low-quality design if not properly assessed against local planning policy at a local level.

Energy efficiency improvements

We agree that significant weight needs to be given to energy efficiency improvements because this will help with the retrofit of existing buildings as an essential activity in tackling the climate emergency. However, further clarification is needed to make the proposed change to NPPF paragraph 161 effective. Energy efficiency proposals must also be balanced against other considerations such as protecting the historic environment (there are, for example, 28 Conservation Areas in Haringey).

The Council also welcomes the commitment to review the practical planning barriers that households can face when installing energy efficiency measures in their homes and would recommend further consideration of powers to enable external wall insulation and a review of permitted development rights to allow for certain types of retrofit proposals to take place.

Future changes to national planning policy

We note the wider changes to planning policy proposed in the future and looking forward to engaging on the detail of these when related consultations are published.

The Council notes that the introduction of NDMPs could reduce the resource challenges of LPAs by removing the need to replicate aspects of national planning policy in local plans. However, we have concerns over the proposed application of NDMPs, in particular Local Plans being precluded from including policies which are inconsistent with the NDMPs and NDMPs taking precedence where there is a conflict between them and development plan policies. The proposals should retain an element of flexibility to reflect local circumstances.

The Council further recommends that the Government confirms that the NDMPs will set minimum standards rather than absolute standards. For example, they should not seek to constrain ambition on policies such as on Net Zero.

The Council supports the Government's proposal to give greater importance to low cost rented housing in national planning policy. This would be consistent with Haringey's Draft Housing Strategy 2022 which seeks to prioritise the delivery of low cost rented homes.

The Council has concerns with the proposal that a planning applicant's past behaviour and trajectories should become a material consideration in planning decisions. This is due to the added complexity this would introduce, associated resource implications, and potential grounds for legal challenges. If the Government is minded to make this a material planning consideration then it should provide robust guidance about what should and shouldn't be taken into account and the weight to be attached to this in planning decisions.

Conclusion

The Council broadly welcomes the suite of proposals put forward by the Government, subject to the caveats listed.

Please find the Council's responses to the individual questions on the following pages. Should you require further information or clarification. Please contact Bryce Tudball, Interim Head of Planning Policy, Transport & Infrastructure.

Yours faithfully



Cllr Dana Carlin
Cabinet Member for Housing Services, Private Renters and Planning

Chapter 3 – Providing certainty through local and neighbourhood plans

Q.1: Do you agree that local planning authorities should not have to continually demonstrate a deliverable 5-year housing land supply (5YHLS) for as long as the housing requirement set out in its strategic policies is less than 5 years old?

Yes

Q2: Do you agree that buffers should not be required as part of 5YHLS calculations (this includes the 20% buffer as applied by the Housing Delivery Test)?

Yes

Q3: Should an oversupply of homes early in a plan period be taken into consideration when calculating a 5YHLS later on, or is there an alternative approach that is preferable?

Yes.

Q4: What should any planning guidance dealing with oversupply and undersupply say?

No comment.

Q5: Do you have any views about the potential changes to paragraph 14 of the existing Framework and increasing the protection given to neighbourhood plans?

The Council notes these proposals as a practical way to support neighbourhood plans.

Chapter 4 – Planning for housing

Q.6: Do you agree that the opening chapters of the Framework should be revised to be clearer about the importance of planning for the homes and other development our communities need?

No comment.

Q.7: What are your views on the implications these changes may have on plan-making and housing supply?

It is important that the suggested changes are flexible to the specific circumstances of London boroughs and do not undermine the London Plan's target setting for boroughs which is capacity based nor undermine the Strategic Housing Market Assessments of individual boroughs which are produced based on London Plan targets.

Q.8: Do you agree that policy and guidance should be clearer on what may constitute an exceptional circumstance for the use of an alternative approach for assessing local housing needs? Are there other issues we should consider alongside those set out above?

See answer to question 7.

Q.9: Do you agree that national policy should make clear that Green Belt does not need to be reviewed or altered when making plans, that building at densities significantly out-of-character with an existing area may be considered in assessing whether housing need can be met, and that past over-supply may be taken into account?

No comment.

Chapter 4 – Planning for housing

Q.10: Do you have views on what evidence local planning authorities should be expected to provide when making the case that need could only be met by building at densities significantly out-of-character with the existing area?

A Character, Growth and Placemaking study can support LPAs with making this case. This would involve a borough-wide characterisation assessment with a focus on identifying capacity for change and growth. This would also enable identifying if and where there are locations where tall buildings may be appropriate.

Q.11: Do you agree with removing the explicit requirement for plans to be ‘justified’, on the basis of delivering a more proportionate approach to examination?

Yes, we support the proposal to adopt a more proportionate approach to the examination of plans as a pragmatic way to support a more streamlined and efficient plan-making process.

Although we would like to emphasise that the Council supports the principle of robust placemaking, which should continue to include a need to produce evidence to inform and explain plans. We therefore support keeping reference to the need for “proportionate evidence” as part of the plan-making process.

Q.12: Do you agree with our proposal to not apply revised tests of soundness to plans at more advanced stages of preparation? If no, which if any, plans should the revised tests apply to?

No comment.

Q.13: Do you agree that we should make a change to the Framework on the application of the urban uplift?

No comment.

Q.14: What, if any, additional policy or guidance could the department provide which could help support authorities plan for more homes in urban areas where the uplift applies?

No comment

Q.15: How, if at all, should neighbouring authorities consider the urban uplift applying, where part of those neighbouring authorities also functions as part of the wider economic, transport or housing market for the core town/city?

No comment

Q.16: Do you agree with the proposed four-year rolling land supply requirement for emerging plans, where work is needed to revise the plan to take account of revised national policy on addressing constraints and reflecting any past over-supply? If no, what approach should be taken, if any?

No comment.

Q.17: Do you consider that the additional guidance on constraints should apply to plans continuing to be prepared under the transitional arrangements set out in the existing Framework paragraph 220?

No comment.

Q.18: Do you support adding an additional permissions-based test that will ‘switch off’ the application of the presumption in favour of sustainable development where an authority can demonstrate sufficient permissions to meet its housing requirement?

We recommend basing the Housing Delivery Test on the number of permissions granted instead of completions with the objective of keeping the test as simple as possible.

Q.19: Do you consider that the 115% 'switch-off' figure (required to turn off the presumption in favour of sustainable development Housing Delivery Test consequence) is appropriate?

No comment.

Q.20: Do you have views on a robust method for counting deliverable homes permissioned for these purposes?

No comment.

Q. 21: What are your views on the right approach to applying Housing Delivery Test consequences pending the 2022 results?

No comment.

Chapter 5 – A planning system for communities

Q.22 Do you agree that the government should revise national planning policy to attach more weight to Social Rent in planning policies and decisions? If yes, do you have any specific suggestions on the best mechanisms for doing this?

Yes, the Council supports this proposal. It is important, however, that Government notes there are other affordable housing tenures which meet the same needs as Social Rent and therefore flexibility should be provided for these to be delivered instead of/alongside Social Rent (e.g Council Rent / Target Rent / London Affordable Rent and General Needs Low Cost Rented Housing).

After 40 years during which councils were stopped from building, in 2018 we started a new era of Council home building in Haringey. We have already started to deliver over 1000 Council homes. We will continue to build up the Council's capacity to deliver the Council homes Haringey needs, and we will make sure our Council Housing Delivery Programme is financially viable in the long term. By 2031, we will have completed more than 3,000 new Council homes.

Q.23: Do you agree that we should amend existing paragraph 62 of the Framework to support the supply of specialist older people's housing?

Yes, we support the proposed more detailed definition of what constitutes older people's housing. Specialist and older persons housing is a particular priority for Haringey with a focus on providing safe environments which facilitate independent living for vulnerable residents and older people in Haringey.

Q.24 Do you have views on the effectiveness of the existing small sites policy in the National Planning Policy Framework (set out in paragraph 69 of the existing Framework)?

No comment.

Q.25 How, if at all, do you think the policy could be strengthened to encourage greater use of small sites, especially those that will deliver high levels of affordable housing?

No comment.

Q.26: Should the definition of "affordable housing for rent" in the Framework glossary be amended to make it easier for organisations that are not Registered Providers – in particular, community-led developers and almshouses – to develop new affordable homes?

No comment.

Q.27: Are there any changes that could be made to exception site policy that would make it easier for community groups to bring forward affordable housing?

No comment.

Q.28: Is there anything else that you think would help community groups in delivering affordable housing on exception sites?

No comment.

Q.29: Is there anything else national planning policy could do to support community-led developments?

No comment.

Q.30: Do you agree in principle that an applicant's past behaviour should be taken into account into decision making? If yes, what past behaviour should be in scope?

The Council has concerns with this proposal due to the practicality of assessing such a material consideration, the extra bureaucracy and resources needed, and the scope for legal challenge. If the Government is minded to make an applicant's past behaviour a material planning consideration then it should provide robust guidance about what should and shouldn't be taken into account and the weight to be attached to this in planning decisions.

Q.31: Of the 2 options above, what would be the most effective mechanism? Are there any alternative mechanisms?

None.

Q.32 Do you agree that the three build out policy measures that we propose to introduce through policy will help incentivise developers to build out more quickly? Do you have any comments on the design of these policy measures?

We do not agree. It will result in fewer permissions and a smaller pipeline, thus slowing down overall delivery. It will provide extra work, and extra opportunities for litigation which will slow the planning process down, not speed it up.

Chapter 6 – Asking for beauty

Q.33: Do you agree with making changes to emphasise the role of beauty and placemaking in strategic policies and to further encourage well-designed and beautiful development?

We support the additional references to placemaking alongside beauty because while design is a key consideration when making planning decisions, it is just one of potentially many important considerations.

For Haringey, Placemaking is an ongoing process that seeks to:

- empower our residents and stakeholders to shape places that enable everyone to reach their potential;
- meet our diverse needs and ambitions to deliver a fairer, healthier, greener Haringey; and
- enhance and celebrate our unique environments, histories, cultures, and identities.

Q.34: Do you agree to the proposed changes to the title of Chapter 12, existing paragraphs 84a and 124c to include the word 'beautiful' when referring to 'well-designed places' to further encourage well-designed and beautiful development?

The Council has previously confirmed that it generally supports the changes relating to policy on the quality of design of new development. These proposals further embed these changes and as such we

welcome them for the support that they could provide for LPAs to require high quality development proposals.

However, to reemphasise points that we have made in previous consultation responses, the production of high-quality design guides and codes takes time and would require significant resource and expertise to deliver. The proposed change to the Framework further embeds the expectation that all LPAs should prepare design guides or codes. While we support this in principle, LPAs would need to be provided with a significant amount of extra resource to deliver this.

Q.35: Do you agree greater visual clarity on design requirements set out in planning conditions should be encouraged to support effective enforcement action?

Yes, Haringey already requires detailed drawings and material details of the following list (*although this can be expanded or reduced depending on the complexity of the proposal*) as a condition prior to works commencing. We would welcome support for requiring such details in the NPPF specifically to help LPAs in requiring high quality design.

- a) Detailed elevational treatment;
- b) Detailing of roof and parapet treatment;
- c) Windows and doors (including plan, elevation and section drawings indicating jamb, head, cill, reveal and surrounds of all external windows and doors at a scale of 1:10), which shall include a recess of at least 115mm;
- d) Details of entrances and porches which shall include a recess of at least 115mm;
- e) Details and locations of down pipes, rainwater pipes or foul pipes and all external vents;
- f) Details of balustrading;
- g) Facing Brickwork: sample panels of proposed brickwork to be used showing the colour, texture, pointing, bond, mortar, and brickwork detailing shall be provided;
- h) Details of cycle, refuse enclosures and plant room; and
- i) Any other external materials to be used

Q.36 Do you agree that a specific reference to mansard roofs in relation to upward extensions in Chapter 11, paragraph 122e of the existing Framework is helpful in encouraging LPAs to consider these as a means of increasing densification/creation of new homes? If no, how else might we achieve this objective?

No, the Council does not agree with the specific reference to mansard extensions. Mansards are not the only or even main form of upward extension possible or suitable on the majority of existing buildings. They are only really suitable for and really established as the characteristic form of rooftop extension on Georgian buildings and others in Georgian style, where the existing roof is either flat or a hidden shallow pitched roof, behind a high parapet. These do not form the majority of the existing housing stock in Haringey or in most other local authority areas.

Other models of upward extensions on different building typologies include set-back additional floor(s), often a harmonious design solution on “Modernist” buildings, and appropriately designed dormers (modestly sized) to pitched roofs. More rarely a mansard will occasionally be successful on a pitched roofed building with overhanging eaves, provided the overhang is replicated, and proportions and details are handled sensitively. However, the existing building appearance is going to be more radically transformed, with greater changes to character of the context, with this sort of the extension, than with all the other forms of “low impact” additional floor extensions noted above, and the presence of plenty of similar extensions, done with a great deal of consistency, is important to allow these sorts of extensions to be of satisfactory appearance.

Experience in Haringey suggests that the most reliable way to achieve a degree of consistency, an authentic architectural expression, with quality of finishes and lack of overbearing appearance, where simple forms of rooftop extension (authentic mansard, dormer or set-back floor) are not

possible/appropriate, is to promote wholesale additional floor extensions designed to replicate the architecture of the existing full floor below (i.e. the design of the 1st floor in a 2 storey house).

This type of extension has become broadly acceptable model in our [South Tottenham House Extensions SPD](#). This was informed by significant engagement of local stakeholders to achieve the required clarity and definitive guidance in an area with high additional floor demand. It is vital that the existing street-fronting fenestration, vertical dimensions (particularly window head to window cill and window head to eaves or parapet), materials and details, including ornamental stone, brick or plaster details around windows, at corners, eaves and parapets, are closely replicated in the additional floor(s).

It is also important to note that an *authentic* mansard should more normally have two roof pitches; a steep pitch for the lower part, and a much shallower pitched upper part, generally not the frequent recent version of the mansard roof with just the steep pitch and a flat upper roof. That general observation should not obscure the fact that other authentic, older mansard roofed forms are, more occasionally, found, including where the steep pitch is topped by just a flat roof, but in those circumstances, there will often be an ornamental high upstand balustrade at the flat roofed edge.

Chapter 7 – Protecting the environment and tackling climate change

Q.37: How do you think national policy on small scale nature interventions could be strengthened? For example in relation to the use of artificial grass by developers in new development?

The Council does not support the use of artificial grass in new development and would welcome policy and guidance which supports the Council to achieve outcomes which best support biodiversity, drainage and climate change mitigation and adaptation.

Q.38: Do you agree that this is the right approach to making sure that the food production value of high value farmland is adequately weighted in the planning process, in addition to current references in the Framework on best and most versatile agricultural land?

No comment

Q.39: What method and actions could provide a proportionate and effective means of undertaking a carbon impact assessment that would incorporate all measurable carbon demand created from plan-making and planning decisions?

We support the use of carbon impact assessments in relation to travel choices, impact of a development on surrounding developments (e.g., negatively resulting in increased private modes of transport), whole life-cycle carbon emissions (with targets) and land use changes (in favour of restoring to/protecting carbon positive land uses such as peat, wetlands and forests)

More broadly, we would welcome a clear steer to move away from the emphasis of carbon emissions and the link to Building Regulations Part L and to instead encourage energy-related policies for the planning system, such as Energy Use Intensity and Space Heating Demand Targets.

Q.40: Do you have any views on how planning policy could support climate change adaptation further, including through the use of nature-based solutions which provide multi-functional benefits?

We support the need to address climate adaptation, reduce water scarcity, overheating, impact of extreme weather events, increase resilience of our communities and built environment.

It would be helpful if government set out clearer expectations on deeper substrate to require more water retention, healthier plants and less fire risk. Cross-referencing requirements for overheating assessments in pre-applications and planning applications could also ensure that design-led, passive mitigation solutions can be incorporated into the schemes, that then comply with Building Regs Part O on completion.

Open space design (whether this is publicly or privately accessible) should be promoting:

- The ability for users to enjoy the open space at most times of the year – so that it is accessible during hot weather (sufficient canopy cover), wet periods (paths that are raised and allow people to still walk through to promote health and wellbeing), but also the ‘regular’ weather where people can enjoy the shade or sunshine while walking or sitting down
- The maximum greening of spaces to provide green overheating mitigation solutions to adjacent buildings. By promoting the ability for users to enjoy open spaces year-round, and by maximizing greening, we can help to improve the health and well-being of the community and enhance biodiversity.

We suggest that the NPPF be updated to reflect the latest National Adaptation Programme and the third Climate Change Risk Assessment, taking into account the 61 risks and opportunities identified. This can be done by incorporating requirements for overheating assessments in pre-application and planning applications and by promoting the use of design-led, passive mitigation solutions that comply with building regulations.

In general Planning policy could support climate change adaptation by:

1. Encouraging the use of green infrastructure: In order to reduce water scarcity, overheating and the impacts of extreme weather events, planning policy can encourage the provision of green infrastructure in new development. Green infrastructure can include green roofs, living walls, green spaces and water management systems, among others.
2. Promoting nature-based solutions: Planning policy can also encourage the use of nature-based solutions, such as rain gardens, green roofs, and green walls, to mitigate the impacts of climate change. These solutions not only provide resilience against extreme weather events, but also contribute to improving air and water quality, promoting biodiversity and enhancing the aesthetic value of the built environment.
3. Incorporating climate risk assessments: Planning policy could ensure that pre-application and planning applications are subject to climate risk assessments, taking into account the latest National Adaptation Programme and the third Climate Change Risk Assessment. This will help to ensure that new developments are resilient to the impacts of climate change and that passive mitigation solutions are incorporated into their design.
4. Encouraging accessible open spaces: Planning policy can promote the design of open spaces that are accessible and enjoyable for users at all times of the year. This can be achieved by providing sufficient canopy cover during hot weather, raised paths during wet periods, and spaces that allow users to enjoy the shade or sun while walking or sitting down.
5. Maximizing greening: By maximizing the greening of open spaces, planning policy can help to mitigate overheating and provide green solutions for adjacent buildings. This can be achieved through the provision of green roofs, green walls, and the planting of trees and shrubs, among others.
6. In conclusion, by incorporating these measures into planning policy, we can support the adaptation of our communities and built environment to the impacts of climate change and provide multiple benefits, including improving the health and well-being of the community, enhancing biodiversity and mitigating overheating.

Chapter 8 – Onshore wind and energy efficiency

Q.41: Do you agree with the changes proposed to Paragraph 155 of the existing National Planning Policy Framework?

No comment.

Q.42: Do you agree with the changes proposed to Paragraph 158 of the existing National Planning Policy Framework?

No comment.

Q.43: Do you agree with the changes proposed to footnote 54 of the existing National Planning Policy Framework? Do you have any views on specific wording for new footnote 62?

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No comment.

Q.44: Do you agree with our proposed new Paragraph 161 in the National Planning Policy Framework to give significant weight to proposals which allow the adaptation of existing buildings to improve their energy performance?

We agree that significant weight needs to be given to energy efficiency improvements because this will help the retrofit of existing buildings as an essential activity in tackling our climate emergency. However, these proposals must also be balanced against other considerations such as protecting the historic environment.

We consider that further clarification is needed to make the proposed change more effective. This should include specifying the type of energy efficiency improvements that should be supported. This might include stating that improving the fabric and replacing fossil fuels with low-carbon heating solutions and electricity generation are upgrades that should be supported subject to compliance with relevant plan policies.

Further detail on what the government means by ensuring that heritage and amenity will continue to be protected would be helpful. We need to put heritage and energy efficiency on an equal footing because heritage assets will become unusable or unfit to live in if we don't adapt them. There is a pressing need to improve the energy efficiency of existing buildings, including heritage assets and the NPPF should not be ambiguous on this.

We welcome the commitment to review the practical planning barriers that households can face when installing energy efficiency measures in their homes and have the following recommendations to input into that review:

- There would be benefits to more 'powers' to enable external wall insulation where the walls would extend from the existing envelope, and where roofs might be upgraded or renewed to add insulation.
- A review of permitted development rights to allow for certain types of retrofit proposals to take place.
 - This should be extended from householders for single dwellinghouses to include flats in certain cases, e.g., including a PDR where a top floor flat wants to put solar PV on their roof.
 - Any extension of PDRs should include the potential requirement to reduce space heating and cooling demand in existing buildings when sizing any heating/ventilation system.
- Consider how to link up text around conservation area guides and being clear on how external appearances might change to allow buildings to be retrofitted, ensuring adequate engagement with the necessary specialist areas.

More broadly, it is important that the NPPF aligns with the direction of travel by the government in considering embodied carbon of existing buildings and embedding circular economy principles into building design and management.

Chapter 9 - Preparing for the new system of plan-making

Q.45: Do you agree with the proposed timeline for finalising local plans, minerals and waste plans and spatial development strategies being prepared under the current system? If no, what alternative timeline would you propose?

No comment.

Q.46: Do you agree with the proposed transitional arrangements for plans under the future system? If no, what alternative arrangements would you propose?

No comment.

Q.47: Do you agree with the proposed timeline for preparing neighbourhood plans under the future system? If no, what alternative timeline would you propose?

No comment.

Q.48: Do you agree with the proposed transitional arrangements for supplementary planning documents? If no, what alternative arrangements would you propose?

No. Existing adopted SPDs have been subject to public consultation and should continue to have effect until decided otherwise by an LPA.

Chapter 10 – National Development Management Policies

Q.49: Do you agree with the suggested scope and principles for guiding National Development Management Policies?

The Council notes that the introduction of NDMPs could reduce the resource challenges of LPAs by removing the need to replicate aspects of national planning policy in local plans. However, we have concerns over the proposed application of NDMPs, in particular Local Plans being precluded from including policies which are inconsistent with the NDMPs and NDMPs taking precedence where there is a conflict between them and development plan policies. The proposals should retain an element of flexibility to reflect local circumstances.

The Council further recommends that the Government confirms that the NDMPs will set minimum standards rather than absolute standards. For example, they should not seek to constrain ambition on policies such as on Net Zero. In March 2019, Haringey Council declared a Climate Emergency, and followed this up with a Climate Change Action Plan (2021) outlining our approach to becoming a net zero-carbon borough by 2041. Our New Local Plan will have a key role in achieving this by setting ambitious carbon reducing planning policies and ensuring that efforts to address the Climate Emergency are central to and embedded throughout the plan.

Q.50: What other principles, if any, do you believe should inform the scope of National Development Management Policies?

No comment.

Q.51: Do you agree that selective additions should be considered for proposals to complement existing national policies for guiding decisions?

No comment.

Q.52: Are there other issues which apply across all or most of England that you think should be considered as possible options for National Development Management Policies?

No comment.

Chapter 11 – Enabling Levelling Up

Q.53: What, if any, planning policies do you think could be included in a new Framework to help achieve the twelve levelling up missions in the Levelling Up White Paper?

No comment.

Q.54: How do you think the Framework could better support development that will drive economic growth and productivity in every part of the country, in support of the levelling up agenda?

No comment.

Q.55: Do you think that the government could go further in national policy, to increase development on brownfield land within city and town centres, with a view to facilitating gentle densification of our urban cores?

No comment.

Q.56: Do you think that the government should bring forward proposals to update the Framework as part of next year's wider review to place more emphasis on making sure that women, girls and other vulnerable groups feel safe in our public spaces, including for example policies on lighting/street lighting?

Yes, the Council supports this proposal and considers that doing more to ensure that women, girls and other vulnerable groups feel safe in our public spaces is essential.

Chapter 13 - Practical changes and next steps

Q.57: Are there any specific approaches or examples of best practice which you think we should consider to improve the way that national planning policy is presented and accessed?

No comment.

Q.58: We continue to keep the impacts of these proposals under review and would be grateful for your comments on any potential impacts that might arise under the Public Sector Equality Duty as a result of the proposals in this document.

No comment.

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Report for: Strategic Planning Committee 20 June 2023

Title: Proposed draft Local Validation List for consultation 2023

Report authorised by: Rob Krzyszowski, Assistant Director, Planning, Building Standards & Sustainability

Lead Officer: Robbie McNaugher, Head of Development Management & Enforcement

Ward(s) affected: All

**Report for Key/
Non Key Decision:** Non-key

1. Describe the issue under consideration

- 1.1 The purpose of this report is to seek the Committee's views on the proposed draft Local Validation List for planning applications.
- 1.2 The Council, as the Local Planning Authority (LPA) may publish a bespoke list of information requirements to be submitted with planning (and related) applications if it wishes to request information over and above that set out in legislation. The list must be reviewed and updated every two years. The existing July 2021 list is therefore now required to be reviewed and updated.
- 1.3 It is intended that the LPA will consult on the proposed draft List for a period of four weeks during June/July 2023. Consultation would be undertaken with all known planning agents and developers operating within the borough and placed on the Council website so that other interested parties can comment.
- 1.4 The proposed draft Local Validation List for consultation is set out in Appendix 1.

2. Recommendations

- 2.1 That Strategic Planning Committee:
 - 2.2 Considers and provides comment on the proposed draft Local Validation List for planning applications set out in Appendix 1
 - 2.3 Notes that a final draft version of the List will be published for consultation for four weeks during June/July 2023.
 - 2.4 Notes that the Assistant Director for Planning, Building Standards and Sustainability has delegated authority to approve the final List following consultation. This will include consideration of any consultation comments received and will be in consultation with the Cabinet Member for Housing Services, Private Renters and Planning.

3. Reasons for decision

- 3.1 An up-to-date local validation list is essential to ensure that all the necessary information is submitted with planning applications to enable the LPA to process them efficiently and consistently against local policies.

4. Alternative options considered

- 4.1 Do nothing: the 2021 list would become obsolete in July 2023. The inability to seek full, and locally important information with planning applications would have significant implications in terms of the determination and assessment of planning applications and may result in the Council failing to meet its obligations e.g. environmental standards, housing-delivery, government targets, etc.
- 4.2 If the updated list is delayed for a significant period, or is not updated at all, the LPA could be challenged by applicants / developers in our information requests. This has the potential to delay the processing of planning applications or result in resources being used on appeals against non-validation.

5. Background information

- 5.1 The Government publishes a 'National List' of validation requirements, which covers basic information: (a) application form, (b) plans, (c) fee and (d) any locally required information. It is for each LPA to specify what it requires under (d).
- 5.2 The National Planning Policy Framework states that Local planning authorities should publish a list of their information requirements for applications for planning permission. These requirements should be kept to the minimum needed to make decisions, and should be reviewed at least every 2 years. Local planning authorities should only request supporting information that is relevant, necessary and material to the application in question.
- 5.3 The National Planning Practice Guidance advises that local planning authorities should consult on changes to their list of information requirements before they are finalised and published.
- 5.4 The proposed draft List (Appendix 1) will be sent directly to stakeholders (i.e. those who engage with the LPA, including developers, agents, councillors, local groups, societies and associations). The consultation will also be published on the Council's website and in the local press. A period of four weeks will be given for responses from June to July.
- 5.5 The key changes proposed since the adopted July 2021 version, having regard to the NPPF and current development plan, in the update are:
- **Following feedback from Councillors at previous Strategic Planning Committee discussions, further requirements on how plans are set out to enable direct comparison between existing and proposed plans**
 - **Requirements to set out neighbouring properties as context on proposed plans**

- **Removing the requirement for a hard copy of plans due to paperless working**
- **Requirements for Biodiversity Net Gain Metric Calculation (Applicable from November 2023) and Small Sites Metric Calculations (Applicable from April 2024) to reflect emerging legislation**
- **Requirements for a draft S106 agreement for minor developments to speed up the application process for securing car free and zero carbon obligations**
- **Requirements for water/waste water utilities assessment to reflect London Plan policy and latest practice**
- **Other minor amendments and updates**

5.6 Following consultation, all responses will be considered before the List is finalised.

6. Contribution to strategic outcomes

6.1 The updated List will support the Development Management service in supporting the Corporate Delivery Plan's focus on 'getting the basics right', 'responding to the climate emergency' and delivering 'homes for the future' and 'place and economy' objectives.

7. Statutory Officers comments

Legal

7.1 The Council may adopt local information requirements for planning applications and consents.

7.2 The proposed updated list of local information requirements will sit alongside the national information requirements and must accord with section 62 of the Town and Country Planning Act 1990 and Part 3 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

7.3 Information requested on the Council's local validation list must be:

- reasonable having regard, in particular, to the nature and scale of the proposed development; and
- about a matter which it is reasonable to think will be a material consideration in the determination of the application.

7.3 The process to be followed to review a list of local information requirements is set out in the National Planning Practice Guidance which requires consultation responses to be taken into account before a revised list is finalised and published on the Council's website.

7.4 The decision to approve local validation lists is not a decision that legislation specifies cannot be taken by the Council's executive nor, will it involve expenditure of £500,000 or result in substantial public interest or significant social, economic or environmental risk, and so is a decision that officers can take pursuant to the Council's Constitution, as a non-key decision.

Equalities

- 7.5 The council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share those protected characteristics and those people who do not
 - Foster good relations between people who share those characteristics and people who do not
- 7.6 The three parts of the duty applies to the following protected characteristics: age disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 7.7 It is not expected that this decision will have any negative impacts on individuals or groups who share the nine protected characteristics.

Finance

- 7.8 This report is for the recommendations as set out in para 2 of this report. There are no financial impacts for the Council.

8. Local Government (Access to Information) Act 1985

Planning Applications are on the Planning Register on the Council's website.

Use of Appendices

Appendix 1 – Proposed draft Local Validation List for consultation

APPENDIX 1 PROPOSED DRAFT LOCAL VALIDATION LIST

LOCAL REQUIREMENTS FOR INFORMATION TO BE SUBMITTED WITH PLANNING APPLICATIONS

Consultation Draft June 2023

Context

The Town and Country Planning (Development Management Procedure) (England) Order 2015 requires that unless there is a list of information requirements published within the last two years of the date of submission of the application, the local planning authority cannot require information as part of its validation process.

This 'local list of validation requirements' has been prepared in accordance with National Planning Practice Guidance and paragraph 44 of the National Planning Policy Framework (NPPF).

The information below and on attached links shows what we will expect all applicants to submit.

It is recommended that planning applications are submitted electronically via the **Planning Portal**. You can pay the application fee online at the point of submitting.

The current statutory national requirements for all applications are:

1. Standard application form (three copies plus original unless submitted electronically)
2. Location plan on an up to date map at an identified standard metric scale (typically 1:1250 or 1:2500 to fit onto A4 or A3 paper) with the red line including all land necessary to carry out the proposed development and blue line for any other land owned by the applicant
3. Site plan – direction of North, proposed development in relation to the site boundaries with written dimensions (and public rights of way, trees, hard surfacing and boundary treatment where relevant) typically 1:500 or 1:200
4. Ownership certificate and notices
5. Agricultural land declaration
6. Fee
7. Design and access statement - where required by law in accordance with the Town and Country Planning (General Development Procedure) Order (England) 2015) and The Planning (Listed Buildings and Conservation Areas) Regulations 1990 (as amended)

As defined by Article 9 of the Town and Country Planning (Development Management Procedure) Order 2015, Design and Access Statements are required for the following planning applications:

- Major developments (those which involve the creation of 10 or more residential units; residential development of on a site of 0.5 hectares or more; development on a site of at least 1 hectare; or the provision of a building or buildings where the floor space to be created by the development is 1,000 square metres or more;).
- Proposals where any part of the development is in a Conservation Area and consists of—
 - the provision of one or more dwellinghouses; or
 - the provision of a building or buildings where the floor space created by the development is 100 square metres or more.

A design and access statement shall—

(a) explain the design principles and concepts that have been applied to the development;

- (b) demonstrate the steps taken to consider the context of the development and how the design of the development takes that context into account;
- (c) explain the policy adopted as to access, and how policies relating to access in relevant local development documents have been taken into account;
- (d) state what, if any, consultation has been undertaken on issues relating to access to the development and what account has been taken of the outcome of any such consultation; and
- (e) explain how any specific issues which might affect access to the development have been addressed

Further guidance can be found at <https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement>
Design and Access statements are also required with all applications for Listed Building Consent.

CIL

All developments generating a floorspace of more than 100 square metres or an additional residential unit are CIL liable and will be obliged to submit a 'determining whether a development is CIL liable' form and plan or drawing showing any chargeable development and gross internal area in square metres on each plan.

The following table sets out our local information requirements. Information requested with a particular planning application will be considered in relation to the statutory tests that the information is reasonable having regard to the nature and scale of the proposed development and is about a matter which it is reasonable to think will be a material consideration in the determination of the application (set out in Article 34 (3) (c) of the DMPO 2015)

Please note that Haringey requires all applications to have a scale bar and all proposed plans/elevations require one significant dimension. This is to ensure that the Planning Officer can accurately measure dimensions using measuring software. All drawings must be labelled with a drawing number and note of any revisions.

Validation dispute Local planning authorities should only request supporting information that is reasonable in regard to the nature and scale of the proposal and material to the application in question. If you do not consider a local information requirement to be needed as part of your application you must send the Council a notice setting out the reasons why you consider the information requested does not meet the statutory tests (known as an Article 12 notice) or “Request for Waiver of Planning Application Requirement” form listing the items and explaining the reasons why you do not think the information is needed, setting out a reason for each requirement.

We will consider the notice and must issue a validation notice stating that it no longer requires the information or a non validation notice stating that it still requires the information requested.

Right of appeal

After receiving a non validation notice and after the relevant time period has passed (either 8 or 13 weeks) an applicant may appeal to the Planning Inspectorate against the non determination of the application. If In considering such an appeal the inspector will consider both the dispute regarding invalidity and the merits of the application itself.

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
<p>Existing and proposed plans: All plans to have a scale bar and one significant dimension. All drawings must be labelled with a drawing number and note of any revisions.</p> <p>Existing and proposed plans must be set out on the same drawing to enable comparison.</p>	All applications	All	London Plan Local Plan (DMDPD)	<p>Block Plan: drawn to at least 1:500 scale showing properties either side and to rear of site with North point.</p> <p>Floor plans of each floor: drawn to 1:100 or 1:50: including the outline of the neighbouring property at the same floor level or 5m beyond boundary (whichever is least) on each side.</p> <p>Elevations: drawn to 1:100 or 1:50. for principal street elevations, showing the neighbouring two properties to each side or 10m (whichever is least), to all other elevations the immediate neighbouring property or 5m (whichever is least)</p> <p>Sections: showing finished floor and ground levels</p> <p>Outline applications: plans showing upper and lower limits of for height, width and length of each building</p>

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
CIL liability form	All developments adding more than 100 sqm (GIA) of new development and/or proposing 1 or more new dwelling(s) (even if the floorspace of the new dwelling is under 100sqm)	All	London Plan Local Plan	CIL Regulations Please note: all floor space measurements should be Gross Internal Area (GIA)
Site photographs with affidavit confirming they have been taken within 21 days of the application submission	All	All	Local Plan DMDPD	Policy DM1
Information required for the Planning London Datahub as set out on the Planning Portal 1APP form	All applications	All	The Town and Country Planning (Mayor of London) Order 2008	If you have any questions, please contact: GLA Planning Data Team at planningdata@London.gov.uk
Design Charter Response (to be included in a Design and Access Statement)	All proposals requiring a Design and Access Statement	All	Local Plan DMDPD	Brief description setting out response to Policy DM1 requirements normally as part of the Design & Access Statement.

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
<p>Accessibility statement (to be included in a Design and Access Statement)</p> <p>Demonstrating compliance with Part M4.2 of Building Regulations 2015</p>	<p>All applications that involve the creation of any new residential units, including changes of use and conversions.</p>	<p>All</p>	<p>London Plan Policy Haringey Local Plan SP2</p>	<p>Submit a statement that explains how your proposals complies with Part M4.2 of Building Regulations 2015. You can find out more information about the requirements at</p> <p>https://www.gov.uk/government/publications/access-to-and-use-of-buildings-approved-document-m</p>
<p>Independent fire strategy produced by a third party suitably qualified assessor</p>	<p>All major applications</p>	<p>All</p>	<p>London Plan</p>	<p>See Policy D11 of the London Plan.</p>
<p>Gateway 1 Fire Statement Form</p>	<p>The provision of a relevant building</p> <p>Development of an existing relevant building</p> <p>Development within the curtilage of a relevant building</p> <p>Relevant buildings: Contain two or more dwellings or</p>	<p>All</p>	<p>Building a safer future: proposals for reform of the building safety regulatory system</p>	<p>Further details are available here: https://www.gov.uk/guidance/building-safetyplanning-gateway-one</p> <p>The template form can be found at: https://www.gov.uk/guidance/building-safetyplanning-gateway-one#annex-c-draft-firestatement-form</p>

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	educational accommodation and exceed 18m or more in height, or 7 or more storeys whichever is reached first			
Bin storage details (to be included in a Design and Access Statement)	All applications that involve the creation of any new residential units, including changes of use and conversions. Any new commercial building	All	Haringey Local Plan SP6 - Waste and Recycling and DM4 Provision and design of waste management facilities.	Details of the Waste Space Requirements are set out in Appendix A3 of the Sustainable Design and Construction SPD. www.haringey.gov.uk/housing-and-planning/planning/planning-policy/local-development-framework-ldf/supplementary-planning-guidance-documents/sustainable-design-and-construction-spd
Geo-located 3D Massing Model in fbx file format	Development of 25 residential units or 2,500sqm of commercial floorspace or more.	All	Local Plan	A 3D massing model exported in fbx format which has been created in any of the following software packages; AutoCAD, 3DS Max/Maya, Rhino, SketchUp, and Revit. The model must be geo-located in Ordinance Survey

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
				space, in meters (m) units. The model is intended for the evaluation of massing and should not be a large-set BIM model with full structural information. Instead, it should have less than 65,000 vertices, and does not require internal information (only external). Please contact the Planning Authority for further information regarding requirements.
Basement Impact Assessment-carried out by qualified and recognised assessor demonstrating that the development complies with the requirements of Current Policy.	All applications proposing, new basement development (inc. extensions to existing basements)	All	Local Plan	Policy DM18
Heritage statement	For all development affecting all heritage assets (conservation areas, statutorily or locally listed buildings, Scheduled Ancient Monuments,	All	National Planning Policy Framework (NPPF) S.66 and s.72 of the Listed Buildings and Conservation Areas Act 1990 (As Amended by the Enterprise	Statements should describe the significance of any heritage asset affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	<p>Registered Parks and Gardens and any other designations)</p> <p>Excluding Householder applications in Conservation Areas where the floor space created by the development is less than 100 square metres</p>		<p>and Regulatory Reform Act (ERR) 2013.</p> <p>London Plan Local Plan</p>	<p>understand the potential impact of the proposal on their significance.</p> <p>As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary.</p> <p>Statements should include an assessment of impact of the proposed development on the affected assets and their setting.</p> <p>A clear and convincing justification statement is required where the proposed works would lead to any harm or loss of significance of the heritage assets or their setting.</p>
Water/waste water Utilities Assessment	Major Developments	All	London Plan Local Plan	The assessment should include a letter from the utility company stating that capacity exists within its network or confirmation that capacity can be provided in time to serve the development proposed

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
Flood risk assessment	<p>Proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency);</p> <p>Where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding.</p> <p>*minor development means—</p> <ul style="list-style-type: none"> (i) development of an existing dwellinghouse, or development within the curtilage of such a dwellinghouse, for any purpose incidental to the enjoyment of the dwellinghouse as such; (ii) the extension of an existing building used for non-domestic purposes where the floorspace created by the development does not exceed 250 square metres; and (iii) the alteration of an existing building where the alteration does not increase the size of the building. 		<p>London Plan Local Plan</p> <p>NPPF & Technical guidance on flood risk</p>	<p>The Environment Agency Flood Risk Map can be found online</p> <p>Or on Haringey Mapping System www.haringey.gov.uk/index/maps-online.htm</p> <p>Additional guidance can for these areas can be found on the Environment Agency & General Advice can be found using the below link: https://www.gov.uk/flood-risk-assessment-local-planning-authorities</p>

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	All Major Development and any new residential units within a Critical Drainage Areas		Local Plan Policy	Haringey's critical drainage areas can be found on the Environment Agency website: https://flood-warning-information.service.gov.uk/long-term-flood-risk
Drainage details including a sustainable drainage plan and completed copies of the Council's drainage pro-formas	All major developments	All	London Plan Local Plan	See Haringey's Drainage Application Information requirements for technical assessment. http://www.haringey.gov.uk/environment-and-waste/major-emergencies/drainage-and-flooding
Aboricultural Impact Assessment and Method Statement	Any development proposing tree works: including applications to alter trees with a TPO or works to trees in a conservation area Any development where there are semi-mature or		Local Plan	Statement should include: A plan which identifies the tree or trees to which the application relates and shows boundaries and surrounding properties including distances between the tree in question and other relevant features and, where necessary, explaining ownership of affected trees

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	mature trees within the application site or on adjacent sites including street trees.			<p>which straddle boundaries with neighbouring properties.</p> <p>Information to specify the work for which consent is sought and reasons for making the application covering: the health and condition of the tree(s); and any other explanation or justification (for example, to avoid or address subsidence or other structural damage).</p> <p>Technical supporting evidence from a qualified arboriculturalist and, where subsidence or other structural damage is alleged, a report by a qualified structural engineer or chartered surveyor)</p> <p>Statement and planting plan for any replacement trees identifying species chosen.</p>
Supporting planning statement including justification for	Advertisements	All	Local Plan	You are advised to consult with the Greater London Authority Boroughplanning@tfl.gov.uk before

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
lighting scheme associated with advertisement				submitting any advertisement which may affect Transport for London Road Network (TLRN) which includes: A10 Tottenham High Road (south), Broad Lane/Monument Way, Bruce Grove, Great Cambridge Road and the A406 (North Circular Road), Archway Road A1, Seven Sisters Road.
Ventilation/extraction details and technical details including acoustic details	All applications where commercial extraction flues will be introduced and all application involving a change of use to Use Classes A3, A4 or A5	All	Local Plan	Acoustic report to be included
Archaeological assessment	All applications that may have an impact on archaeology within or adjacent to Areas of Archaeological Potential / Archaeological Priority Areas	Area of Archaeological Potential	The NPPF London Plan Local Plan	Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest an appropriate desk-based assessment should be submitted and, where necessary, a field evaluation undertaken. Historic Environment Good Practice Advice in Planning Notes 1, 2 and 3

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	(consult with GLAAS)			<p>and ‘Making Changes to Heritage Assets’</p> <p>Areas of Archaeological Potential can be found on Haringey Mapping System</p> <p>www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/design-and-conservation/archaeology-and-industrial-heritage</p>
<p>Biodiversity survey and report</p> <p>Including-</p> <ul style="list-style-type: none"> - Preliminary Ecological Appraisal (also known as Extended Phase 1 or Ecological Assessment) - Ecological Impact Assessment and setting out biodiversity enhancement measures 	All applications	<p>Any site designated for its biodiversity value (such as: Sites of Importance for Nature Conservation (SINCS), Local Nature Reserves, Ecological Corridors) or where significant wildlife interest or protected species is known to be present or is reasonable likely to be present or affected (such as those adjacent to a site</p>	<p>NPPF</p> <p>London Plan</p> <p>Local Plan</p> <p>Section 281 of the Wildlife and Countryside Act, 1981 (as amended by the Countryside and Rights of Way Act 2000)</p>	<p>An ecological survey, assessment and mitigation report to be carried out by a suitably qualified professional. The report should detail how these habitats, and any protected species are to be safeguarded during site preparation and construction phases, and maintained in the future. Where proposals are being made for mitigation and/or compensation measures relating to protected habitats and species, information to support those proposals will be required.</p>

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
		designated for biodiversity value.).	Regulation 61 of the Habitats Regulations 2010 (as amended)	Designated areas can be found on The Haringey Mapping System www.haringey.gov.uk/index/maps-online.htm
Biodiversity Net Gain Metric Calculation	Non-small sites development (from November 2023) and small sites (from April 2024)	All	Environment Act 2021	https://www.gov.uk/guidance/complying-with-the-biodiversity-duty#prepare-for-biodiversity-net-gain https://nepubprod.appspot.com/publication/6049804846366720
Landscape Report (including Urban Greening Factor assessment)	All major development	All	London Plan Policy G5 walls, and rain gardens	Urban Greening Factor Showingshowing that Urban Greening has been maximised by meeting the interim targets through, street trees, green roofs, green walls, and rain gardens
Energy Statement Including plans annotated with the location of air/ground source heat pumps, solar PV arrays and living roofs, where	All majors developments and minor developments creating new	All	London Plan Policies SI2 and SI3 Local Plan Policy SP4	Majors Energy Statements should demonstrate a 100% reduction below Building regulations Part L 2013

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
<p>relevant.</p> <p>Where necessary- Unilateral Undertaking agreeing to payment contributions in respect of carbon offsetting where a statement does not demonstrate 100% reduction in carbon emissions, and a final draft undertaking to pay council's legal checking fees, for review by the Council.</p> <p>To also include:</p> <ul style="list-style-type: none"> - GLA Carbon Emission Reporting Spreadsheet - Strategy to reduce overheating risk - SAP/BRUKL worksheets for representative sample dwellings or units - Plans annotated with the location of air/ground source heat pumps, mechanical ventilation, solar PV arrays and living roofs, where relevant. 	<p>residential and/or commercial units</p>			<p>following the Energy Hierarchy, as required by current London Plan Policy SI2 and Local Plan Policy SP4. All Statements should:</p> <ul style="list-style-type: none"> - provide full detail of how the development will reduce emissions under Be Lean, Be Clean and Be Green compared to the notional building with summary tables and by setting out proposed fabric efficiencies, how overheating risk is reduced under the cooling hierarchy, what the proposed space heating/cooling and hot water system(s) are, set out which renewable energy technologies are viable or not viable in the proposed development and confirm what the location, capacity and efficiency of the proposed renewable energy technology/ies will be - set out the fabric energy efficiency improvement and space heating demand - be accompanied by the SAP/BRUKL worksheets to evidence the proposed reduction in emissions (for the baseline, be lean and be green scenarios)

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
				<p>- submit the latest GLA Carbon Emissions Reporting Spreadsheet - calculate the carbon offset contribution if the development cannot meet a 100% reduction in carbon emissions on site</p> <p>The spreadsheet and further guidance on how to structure the Energy Statement can be found on the GLA website: https://www.london.gov.uk/whatwe-do/planning/planning-applications-anddecisions/pre-planning-application-meetingservice-0</p> <p>Minors</p> <p>Energy Statements should demonstrate a 100% reduction below Building regulations Part L 2013 following the Energy Hierarchy. Provide SAP/BRUKL worksheets to evidence the proposed reduction in emissions on site and submit summary tables of the Energy Hierarchy of reducing emissions under Be Lean, Be Clean and Be Green. Set out how emissions are reduced on site,</p>

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
				<p>providing detail behind the inputs and outputs of the SAP/BRUKL calculations, the development's fabric efficiencies, the proposed space heating/cooling and hot water strategy and proposed renewable energy technology.</p> <p>Further guidance on how to structure the Energy Statement can be found on the GLA website: https://www.london.gov.uk/what-we-do/planning/planning-applications-anddecisions/pre-planning-application-meetingservice-0</p> <p>Demonstrating a 100% reduction below Building Regulations Part L 2021 following the Energy Hierarchy, as required by current policy. All statements should be accompanied by the SAP/BRUKL worksheets to evidence the proposed reduction in emissions, for the Baseline, Be Lean and Be Green scenarios</p> <p>Statements should include:</p> <ul style="list-style-type: none"> - Assumptions included in the baseline model

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
				<ul style="list-style-type: none"> - Technical specifications of the proposed building fabric, ventilation, space heating/cooling, hot water and water storage, and renewable energy solutions - Reporting of carbon emission reduction against the Energy Hierarchy, improvement against target fabric energy efficiency, Primary Energy Factor, Energy Use Intensity and space heating demand - How the development reduces overheating risk incorporating measures following the Cooling Hierarchy <p>Further guidance can be found on the GLA website: https://www.london.gov.uk/programmes-strategies/planning/planning-applications-and-decisions/pre-planning-application-meeting-service/energy-planning-guidance</p>
Information required for the GLA's planning stage 'Be	All major applications	All	London Plan Policy SI2	To find out more about the Be Seen reporting, visit: https://www.london.gov.uk/what-we-do/planning/implementing-london-

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
Seen' energy reporting template				plan/london-plan-guidance-and-spgs/be-seen-energy-monitoring-guidance
Overheating Assessment (based on Dynamic Thermal Modelling)	Major developments	All	London Plan Policy SI4 Local Plan Policy DM21	Residential developments (where people will sleep), including dwellings, residential institutions, care homes, sheltered accommodation and temporary accommodation need to be modelled in line with CIBSE TM59 with TM49 weather files. Non-residential areas where people will spend significant amount of time during the day need to be modelled in line with CIBSE TM52. Further advice on full planning application requirements can be found here: https://www.haringey.gov.uk/sites/haringeygovuk/files/haringeys_summary_key_overheating_planning_application_requirements_nov_2021.pdf
Sustainability statement and sustainable design and construction checklist	Any new buildings	All	London Plan SI2, SI4, SI5, SI7 Local Plan Policy DM21	Provide details of sustainable design and construction measures showing how the development proposes to reduce the energy, water and materials used in design and construction in accordance with

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
				current London Plan and Local Plan requirements. To demonstrate how the development incorporates circular economy principles.
BREEAM Pre-Assessment (or equivalent)	All non-residential proposals	All	Local Plan Policy SP4	Submit a BREEAM Pre-Assessment report demonstrating a minimum score of 'Very Good' but aiming for 'Excellent'. Submit a table to demonstrate which credits will be met (out of the total available and under which category), which could be achieved and which will not be met.
Transport Assessment / Transport Statement	Proposal including > 1000 sqm Retail (A1) or Business (B1). > 2000 sqm Non-food retail (A1), Hospital (D1), School, higher and further education (D1), Cinema (D2), Other Assembly and Leisure (D2).	All	London Plan Local Plan	Confirmation that TfL have been consulted and agree the methodology for strategic planning applications referred to in the Mayor's / TfL's Guidance For further information on travel plans contact transport.planning@haringey.gov.uk

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	<p>> 2500 sqm Industrial (B2), Warehousing (B8) Hotel (C1).</p> <p>Any proposals which are likely to have a significant transport impact including all new churches</p>			
	Any proposal	Where a development is located in a sensitive area (Areas where redevelopment proposals could impact on the SRN or TLRN, bus standing/garages/interchanges, operational railway lines and/or London Underground tunnels, in line with London Plan policies to smooth traffic flow and safeguard land for transport).	Haringey Local Plan Policy SP7 DM31, DM32, DM36 London Plan	

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
Retail assessment	For retail development over 2,500 sq metres	All	National Planning Policy Framework Local Plan	
Air quality assessment	All applications for major development Applications for proposals which are likely to have an impact on air quality	Air Quality Management Areas (AQMA)	London Plan Local Plan	The whole of the borough of Haringey is an Air Quality Management Area (AQMA) for the pollutants of NO2 (Nitrogen Dioxide) and PM10 particulates which are the most prominent air pollutants. The dominant source of NO2 and PM10 emissions in Haringey is road transport and combustion plant and other sources contributing to emissions. This has implications for air quality, which is being addressed through the measures outlined in the Council's Air Quality Action Plan For further advice and guidance contact Environmental Health Pollution Team pollution@haringey.gov.uk

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
Dust and Emissions Assessment including Non Road Mobile Machinery (NRMM)	All Major development	AQMA (All of Haringey)	London Plan	The Control of Dust and Emissions during Construction and Demolition SPG http://nrmm.london/
Noise impact assessment	When proposal will result in a change to the qualitative or quantitative acoustic environment brought about by the development and/or where a noise generating use is to be located in close proximity to housing or housing is to be located adjacent to major roads, railway lines and industrial activity – please seek advice from EHO	All	NPPF London Local Plan	

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
Tall buildings statement and verified views	All buildings which are 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London, or are likely, in the views of the local planning authority, to have a significant impact on the skyline	All	London Plan Local Plan	Verified views must be prepared in accordance with GLVIA 2013 (“Guidelines for Landscape and Visual Impact Assessment, 3rd Edition”, by the Landscape Institute and the Institute of Environmental Management and Assessment, 2013). Refer also Historic England Advice Note 4 “Tall Buildings” (2022)
Microclimate study	All buildings which are 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London, or are likely,	All	Local Plan	Wind Impact Assessment or more detailed study as appropriate that shows the tall building will not impact negatively on the microclimatic conditions immediately surrounding the proposed development and identifying appropriate mitigation measures if a potential negative impact could occur.

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
	in the views of the local planning authority, to have a significant impact on the skyline.			
Sunlight/daylight assessment	<p>All major new build applications and tall buildings as defined under the tall buildings statement requirement</p> <p>Major development proposals are likely to have a detrimental effect on habitable rooms of amenity space in neighbouring dwellings, workspaces and public open space.</p>	All	Local Plan	BRE guidance “Site Layout Planning for Daylight and Sunlight – A guide to good practice” (Littlefair, 2022).
S106 Draft heads of terms Not required but recommended: An undertaking	All major developments	All	Local Plan	<p>The Council strongly urges that you use our pre-application advice service in these circumstances</p> <p>https://www.haringey.gov.uk/planning-and-building-control/planning/planning-applications/pre-application-</p>

Information Item	Types of Application that require this information	Geographic Location where this information is required	Policy Driver	What information is required and where to look for further advice
to pay the Council's reasonable legal costs				guidance/pre-application-advice-service
Affordable housing statement	More than 10 net residential units	All	London Plan Local Plan	<p>The statement will need to include:</p> <ul style="list-style-type: none"> • the number of residential units • the mix of units with numbers of habitable rooms • if you are proposing different levels or types of affordability or tenure for different units you should explain this clearly and fully. <p>You should also show the location of units and their number of habitable rooms and/or bedrooms, and/or the floor space of the units on the floor plans</p> <p>The Council strongly urges that you arrange a pre-application meeting before you submit your planning application.</p>

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<p>Viability Assessment & redacted copy excluding any commercially sensitive information which can be published on the Council's website when the application is submitted, The default position is that the full viability assessment will be published when the affordable housing level has been agreed with officers prior to the committee report being published. Applicants will need to provide reasons for any information to be redacted at this stage.</p>	<p>Any application for more than 10 residential units, or providing more than 1000 sqm of floorspace, which is for less than 100% affordable</p>	<p>All</p>	<p>London Plan Local Plan</p>	<p>Viability Assesments should be undertaken using a standard, accepted methodology.</p>
<p>Circular Economy Statement</p>	<p>All applications that are referable to the Mayor of London</p>	<p>All</p>	<p>London Plan Policy SI 7 Reducing waste and supporting the circular economy</p>	<p>Circular Economy Statement should demonstrate:</p> <ol style="list-style-type: none"> 1) how all materials arising from demolition and remediation works will be re-used and/or recycled 2) how the proposal's design and construction will reduce material

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				<p>demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life</p> <p>3) opportunities for managing as much waste as possible on site</p> <p>4) adequate and easily accessible storage space and collection systems to support recycling and re-use</p> <p>5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy</p> <p>6) how performance will be monitored and reported.</p> <p>Guidance on the assessment can be found here: https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs</p>

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Whole Life Carbon Assessment	All applications that are referable to the Mayor of London	All	London Plan Policy SI2	<p>Submit the GLA's Whole Life-Cycle Carbon Assessment template, which should include the main elements:</p> <ul style="list-style-type: none"> - Baseline WLC assessment against each life-cycle module for different building elements by material type, quantity and proportion of recycled materials - Two assessments: current status of electricity grid and second of the expected decarbonisation - Key actions to reduce the development's WLC carbon emissions and further opportunities <p>Queries or feedback on the WLC template should be submitted to ZeroCarbonPlanning@london.gov.uk</p> <p>Guidance on the assessment can be found here:</p>

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				https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/ .
Contaminated Land Assessment	All applications excluding householder	Sites known or suspected to be affected by land contamination such as a landfill site, railway land, waste disposal site, scrapyards, petrol stations and other industrial uses.	London Plan Local Plan	<p>According to the individual site circumstances, the Council will require applicants to undertake the following steps:</p> <ul style="list-style-type: none"> i. a desk top study documenting all previous and existing uses of the site and adjacent land, to include assessment of the potential contamination and a description of potential risks to local receptors. ii. where land uses have resulted in soil and/or groundwater contamination, a site investigation will be required and reported in the form of a quantitative risk assessment. iii. where contamination is present and there exists a significant possibility of significant harm being, or likely to be caused to local receptors a

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				<p>remediation strategy must be submitted for approval by the Council. The strategy should include where necessary, subsequent management and monitoring activities.</p> <p>iv. any remediation works should be fully implemented and verified in a remediation report by a suitably experienced person before occupation of the site. If necessary, monitoring reports after completion of remediation works will be required.</p> <p>All investigations of land potentially affected by contamination should be carried out in accordance with established procedures (such as BS10175 (2001) Code of Practice for the Investigation of Potentially Contaminated Sites) and be undertaken by competent persons</p>
Crime prevention statement	All major applications	All	London Plan Local Plan	For further guidance see 'Secured by Design' websites

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Statement of Community Involvement	All major applications	All	Haringey Statement of Community Involvement The Statement of Community Involvement can be viewed on the website at: www.haringey.gov.uk/sci	A Statement of Community Involvement should identify the consultation undertaken and its results, together with how this has been incorporated into the submitted planning application.
Waste Management Plan	All major applications and applications for larger HMOs	All	London Plan Local Plan	<p>A Waste Management Plan should identify volume and types of demolition and construction waste and to demonstrate how waste will be minimized and managed during construction and occupation.</p> <p>New waste management facilities will be required to take into account and minimise pollution and nuisance issues.</p> <p>Reference should be made to the Site Waste Management Plan Regulations 2008 www.legislation.gov.uk/ukxi/2008/314/contents/made</p>

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Architectural details at a scale of 1:20 to show all new doors, windows, shop fronts, pilasters, cornices, railings and other decorative details	Listed building consent	All	Haringey Local Plan London Plan	
Structural/Historic building survey	Listed building consent– as required.	All	London Plan Haringey Local Plan	Please seek advice from the Design and Conservation Team before submitting an application https://www.haringey.gov.uk/planning-and-building-control/planning/planning-applications/pre-application-guidance/pre-application-advice-service
Photos/photomontages	Development affecting a conservation area or a listed building Proposals which will have a significant effect on the existing streetscene and prior approvals for telecomms		London Plan Haringey Local Plan	

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	application (at the applicant's discretion)			
Submission of statement including relevant supporting documents and plans to enable the local planning authority to discharge the condition or reserved matter	Discharge of a planning condition or reserved matter for an outline planning application	All	Haringey Local Plan	Identification of relevant planning permission
Telecommunications application Supporting planning statement and ICNIRP certificate	planning applications for telecommunications applications	All	Local Plan	<p>Supporting planning statement must cover the following matters:</p> <p>Area of search</p> <ul style="list-style-type: none"> • Technical information including the frequency, modulation characteristics, power output and the height of the proposed antenna • Technical justification - details about the purpose of the site and why the particular development is required • Details of alternative sites rejected with a justification for rejecting them - this should include existing

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				<p>masts, structures and other buildings within the search area</p> <ul style="list-style-type: none"> • An explanation if no alternatives considered • Visual impact assessment where relevant • Acoustic report where relevant <p>Any other relevant information</p>
Sport England Checklist of Recommended Information Requirements	Planning applications affecting playing field land	Playing field land	<p>Paragraph 74 of the NPPF Policy 7.18 Protecting open space and addressing deficiency</p> <p>Local Plan Policy SP13 & DM20</p>	<p>The checklist can be found at:</p> <p>https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport?section=playing_fields_policy</p>

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