NOTICE OF MEETING

CABINET

Tuesday, 13th October, 2020, 6.30 pm - MS Teams(View it Here) This web link will go live at the start of the meeting.

Members: Councillors Joseph Ejiofor (Chair), Seema Chandwani (Deputy Chair), Charles Adje, Kaushika Amin, Mark Blake, Gideon Bull, Kirsten Hearn, Emine Ibrahim, Sarah James and Matt White

Quorum: 4

1. FILMING AT MEETINGS

Please note that 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. Although we ask members of the public recording, filming or reporting on the meeting not to include the public seating areas, members of the public attending the meeting should be aware that we cannot guarantee that they will not be filmed or recorded by others attending the meeting. 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 and using the public seating area, 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

To receive any apologies for absence.

3. URGENT BUSINESS

The Chair will consider the admission of any late items of Urgent Business. (Late items of Urgent Business will be considered under the agenda item where they appear. New items of Urgent Business will be dealt with under Item 21 below. New items of exempt business will be dealt with at Item 30 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. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

On occasions part of the Cabinet meeting will be held in private and will not be open to the public if an item is being considered that is likely to lead to the disclosure of exempt or confidential information. In accordance with the Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 (the "Regulations"), members of the public can make representations about why that part of the meeting should be open to the public.

This agenda contains exempt items as set out at **Item** *[22]* **: Exclusion of the Press and Public.** No representations with regard to these have been received.

<u>This is the formal 5 clear day notice under the Regulations to confirm that this Cabinet meeting will be partly held in private for the reasons set out in this Agenda.</u>

6. MINUTES (PAGES 1 - 30)

To confirm and sign the minutes of the meeting held on 15 September 2020 as a correct record.

7. DEPUTATIONS/PETITIONS/QUESTIONS

To consider any requests received in accordance with Standing Orders.

8. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

Cabinet to consider the Scrutiny Review on Blue Badges and Supporting Better Access to Parking for Disabled People and further consider the response to the Scrutiny recommendations.

The Scrutiny Review to be introduced by Cllr Ahmet, Chair of Overview and Scrutiny

Response to the Scrutiny recommendations – Cllr Chandwani - Cabinet Member for Cabinet Member for Transformation and Public Realm]

9. SCRUTINY PANEL REVIEW ON BLUE BADGES AND SUPPORTING BETTER ACCESS TO PARKING FOR DISABLED PEOPLE (PAGES 31 - 84)

[Report of the Director for Environment and Neighbourhoods. To be introduced by the Cabinet Member for Cabinet Member for Transformation and Public Realm]

To consider the Cabinet response to the Scrutiny Review]

10. NEW LOCAL PLAN: FIRST STEPS ENGAGEMENT (PAGES 85 - 378)

[Report of the Director for Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Cabinet Member for Planning and Corporate Services]

The Council has begun preparing a new Local Plan to replace the existing Plan adopted in 2017. The new Plan will ensure that the Council continues to have a robust and fit-for-purpose framework for the future planning of our borough and will be used to determine planning applications once adopted. The new Plan will take into account changes to national planning policy, the new London Plan, the new Borough Plan priorities and will aid the borough's recovery from COVID 19. The Plan will also meet legal and policy requirements for the Council to have an up to date plan and 5 year Housing Land Supply. Cabinet are being asked to approve a "New Local Plan: First Step engagement" document for consultation. The document will set out the key issues and challenges for the future planning of the borough and related opportunities and options. It will be the first stage of consultation and engagement on the New Local Plan and will seek the community's views on how we should address key issues.

11. CHILDREN'S SERVICES UPDATE (PAGES 379 - 404)

[Report of the Director for Children's Services. To be introduced by the Deputy Leader and Cabinet Member for Children , Education and Families]

To provide Cabinet with further updates from the Ofsted Focused Visit and associated improvement plan.

12. EXTENSION OF ALCOHOL & DOG CONTROL PSPOS (PAGES 405 - 574)

[Report of the Director for Environment and Neighbourhoods. To be introduced by the Cabinet Member for Communities]

Consider and approve recommendations on the consultation findings of Public Space Protection Orders on:
1. The extension to 12 existing orders covering the control of alcohol and dogs.
2. Vary the boundary of Woodside Ward for alcohol control.
3. The new requirement for a person in charge of a dog to carry a means to pick up dog waste.

"The Council's existing Public Space Protection Orders (PSPO) for Alcohol & Dog Control expire on the 18th October 2020. On 10th March 2020 the Cabinet gave approval to consult on the extension and variation of the existing PSPOs. Within two weeks of the Cabinet decision to consult the lockdown period began and all but essential staff were asked to remain at home and Business Continuity planning was prioritised.

The months following the initial Covid-19 lockdown at the end of March impacted significantly on the ability to carry out an effective consultation. As lockdown measures began to ease throughout June a decision was taken to resume consultation and this was re-commenced at the beginning of July and closed on Monday 17 August 2020.

The extension and variation of the dog and alcohol PSPOs has been published on the forward plan for a cabinet decision on 13th October 2020. Although the initial delay in consultation was unavoidable every effort has been made to ensure that the consultation and analysis was completed along with the Report to Cabinet and supporting documents. However this has created further challenges as the original PSPO expires on 18th October 2020 and must therefore be extended before they expire.

If the original PSPO's are not agreed to be extended as of 18th October they will be considered discharged which will result in having to go back to Cabinet to make a fresh request for new PSPO's which will require a new consultation, and there would be no control measures in place for minimum period of three months whilst a new consultation takes place. Therefore the Chair of OSC has agreed to waive the call-in process to ensure that this situation does not arise, and for the new orders to be implemented without delay.

The Chair of Overview and Scrutiny Committee has agreed that the decision should be treated as a matter of urgency. This is in accordance with Part 4, Section H, and Paragraph 18 (a) and (b) of the Council Constitution."

13. TANGMERE AND NORTHOLT COMPULSORY PURCHASE ORDER (PAGES 575 - 646)

[Report of the Director for Housing, Planning and Regeneration. To be introduced by the Cabinet Member for Housing and Estate Renewal.]

This paper brings forward proposals to start CPO proceedings to secure vacant possession of Tangmere and Northolt blocks following the identification of serious structural defects.

14. THE ACQUISITION OF TWO HEAD LEASES AND GRANT OF A NEW LEASE AT THE CHOCOLATE FACTORY, WOOD GREEN (PAGES 647 - 662)

[Report of the Director of Housing Regeneration and Planning. To be introduced by the Cabinet Member for Finance and Strategic Regeneration.]

The decision is to acquire two long leases from Workspace on Council freehold land at the Chocolate Factory, Wood Green. A small part of the Chocolate Factory site would be leased back to Workspace and realignment of the freehold red line in order to enable the development of Council residential and workspace accommodation on the sites.

15. AWARD OF CONTRACT FOR PROVISION OF ICON MANAGED SERVICE & MID CALL SOLUTION (PAGES 663 - 668)

[Report of the Director for Customers, Transformation and Resources. To be introduced by the Cabinet Member for Planning and Corporate Services.]

Award of contract for the provision of the Icon Managed Service & Mid Call solution. Haringey operate the Icon payments system to process card payments from customers, both face to face and online, which then interfaces into line of business applications, to SAP and the banks. Mid Call solution which allows the customers services representative to stay on the line whilst payment is being made by the customer to help with any issues and deal with further queries they may have that are unrelated to the payment.

16. VARIATION TO THE SAP CONTRACT (PAGES 669 - 674)

[Report of the Director for Customers, Transformation and Resources. To be introduced by the Cabinet Member for Planning and Corporate Services.]

This report details how we can achieve greater saving with our SAP partner on the purchase of professional days of support and seeks approval to vary

the current contact accordingly. SAP is the software used to manage key council functions for finance, procurement and human resources.

17. GRANTING OF A LEASE TO A GP PRACTICE OF ACCOMMODATION AT 54 MUSWELL HILL (PAGES 675 - 684)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Finance and Strategic Regeneration.]

To agree to the leasing of the ground and two upper floors at 54 Muswell Hill to be used as a Health Centre for the local community.

18. AWARD OF CONTRACT FOR HOMES FOR HARINGEY INTERNAL WORKS (NORTH) IN (YEAR 3) 2021-22 (PAGES 685 - 690)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Housing and Estate Renewal.]

To seek approval for the appointment of the successful contractor to undertake refurbishment works to replace kitchens, bathrooms, electrics and other associated works at properties boroughwide.

19. AWARD OF CONTRACT FOR HOMES FOR HARINGEY INTERNAL WORKS (SOUTH) IN (YEAR 3) 2021-22 (PAGES 691 - 696)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Housing and Estate Renewal.]

To seek approval for the appointment of the successful contractor to undertake refurbishment works to replace kitchens, bathrooms, electrics and other associated works at properties boroughwide.

20. MINUTES OF OTHER BODIES (PAGES 697 - 702)

To note the minutes of the following:

Urgent Decision 29/09/2020
Urgent Decision 5 /10/2020

21. NEW ITEMS OF URGENT BUSINESS

To consider any items admitted at Item 2 above.

22. EXCLUSION OF THE PRESS AND PUBLIC

Note from the Democratic Services and Scrutiny Manager

Items 23 to 30 allow for consideration of exempt information in relation to items 13, 14, 15, 17, 18, 19, and 6.

TO RESOLVE

That the press and public be excluded from the remainder of the meeting as the items below, contain exempt information, as defined under paragraph 3 and 5, Part 1, schedule 12A of the Local Government Act:

- Information relating to the financial or business affairs of any particular person (including the authority holding that information).
- Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings

23. EXEMPT TANGMERE AND NORTHOLT COMPULSORY PURCHASE ORDER (PAGES 703 - 718)

As per item 13.

24. EXEMPT THE ACQUISITION OF TWO HEAD LEASES AND GRANT OF A NEW LEASE AT THE CHOCOLATE FACTORY, WOOD GREEN (PAGES 719 - 730)

As per item 14.

25. EXEMPT AWARD OF CONTRACT FOR PROVISION OF ICON MANAGED SERVICE & MID CALL SOLUTION (PAGES 731 - 732)

As per item 15.

26. EXEMPT GRANTING OF A LEASE TO A GP PRACTICE OF ACCOMMODATION AT 54 MUSWELL HILL (PAGES 733 - 738)

As per item 17.

27. EXEMPT AWARD OF CONTRACT FOR HOMES FOR HARINGEY INTERNAL WORKS (NORTH) IN (YEAR 3) 2021-22 (PAGES 739 - 742)

As per item 18.

28. EXEMPT AWARD OF CONTRACT FOR HOMES FOR HARINGEY INTERNAL WORKS (SOUTH) IN (YEAR 3) 2021-22 (PAGES 743 - 746)

As per item 19.

29. EXEMPT MINUTES (PAGES 747 - 750)

To approve the exempt minutes for the meeting held on the 15 September 2020.

30. NEW ITEMS OF EXEMPT URGENT BUSINESS

To consider any items admitted at Item 3 above.

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Monday, 05 October 2020

Agenda Item 6

MINUTES OF MEETING CABINET HELD ON TUESDAY, 15TH SEPTEMBER, 2020, 6.30PM

PRESENT:

Councillors: Joseph Ejiofor (Chair), Seema Chandwani (Deputy Chair), Charles Adje, Kaushika Amin, Mark Blake, Gideon Bull, Kirsten Hearn, Emine Ibrahim, Sarah James and Matt White

ALSO ATTENDING: Councillors- Ogiehor and Mitchell

278. FILMING AT MEETINGS

The Leader referred to the notice of filming at meetings and the meeting noted this information.

279. APOLOGIES

There were apologies for lateness from Cllr Ibrahim.

Cllr Ibrahim arrived soon after at item 280.

280. URGENT BUSINESS

None

281. DECLARATIONS OF INTEREST

None

282. NOTICE OF INTENTION TO CONDUCT BUSINESS IN PRIVATE, ANY REPRESENTATIONS RECEIVED AND THE RESPONSE TO ANY SUCH REPRESENTATIONS

None

283. MINUTES

RESOLVED

To approve the minutes of the meeting held on the 14th of July 2020.

284. MATTERS REFERRED TO CABINET BY THE OVERVIEW AND SCRUTINY COMMITTEE

None

285. DEPUTATIONS/PETITIONS/QUESTIONS

Deputation in relation to item 14

Mr Bruno Carr addressed the Cabinet in relation to agenda item 14. He informed Members that he was supporting the 2200 residents, 85% of the consultation respondents, that were against the proposal to increase the charges for parking permits in the borough and whom he felt were being ignored. Mr Carr felt that, given the current economic climate, it was untimely to increase any charges.

He felt that the response to the objections in the report was weak and questioned the presentation of these objections and how the evidence had been added to support these. He continued to contend that there was greater emphasis in the document on the positive responses to the consultation rather than those objecting.

Mr Carr continued to question the principles behind the increased parking permit charges, highlighting the higher proportionate percentage increase to parking permits for more environmentally efficient cars against more polluting cars. The proposed changes were also not fully aligning to the Ultra Low Emissions Zone vehicle categories. There had already been careful analysis and assessment of the vehicles by TFL experts and scientists of low emission vehicles that were to be encouraged for purchase and use. The proposals seemed to penalise residents that had bought these vehicles.

He requested that the Cabinet Members either defer the decision for six months, and reassess the economic situation, or reassess the charges to match the ULEZ.

The Leader thanked Mr Carr for his deputation.

In response to questions from Cabinet Members, Mr Carr responded as follows:

- He agreed that Friends of the Earth would support the aims of the decision to reduce emissions and improve air quality and he also supported this aim. However, Mr Carr felt that the percentage increases proposed had not been looked at clearly and if they had been would have been challenged as there was a unequal increase when comparing permit charge increases between electric or hybrid cars and higher polluting cars. It was felt that if further work had been completed, at the early stage, with environmental groups, this would have provided a fairer strategy, leading to increases in more polluting cars and better connection with TFL analysis which allowed diesel cars in the euro six category to be exempt.

- In relation to the optimal increases sought, Mr Carr spoke about expecting to see the highest percentages of the most significant increases levied against the

most polluting cars and less against electric cars and hybrid models. Mr Carr felt that residents would need to understand the impact of higher polluting cars on air quality to encourage use of lower emitting vehicles. Also, he felt that there was a need to consider the whole question of emissions across parking, and road traffic, instead of solely targeting additional income from residents.

- Mr Carr questioned the strategy of tackling parked vehicles under the guise of emissions. He expressed that improved public transport access, more cycling routes and improved highways needed to be in place before taking forward behavioural change activities.

Councillor Chandwani, Deputy Leader of the Council and Cabinet Member for Neighbourhoods, responded to Mr Carr's deputation as follows:

- Disputed the focus on percentage increase by the deputation and instead underlined that increases were at real value cost.

- The increase was £10 per year for a low emission vehicle, and £20 per year for a high emission vehicle, therefore it was wrong to imply that a higher percentage increase for low emission vehicles meant a higher charge. [Clerks note - The report at paragraph 6.5 advised that the changes consulted on include a £10 increase across all existing charge bands to help cover the cost of running the service - later in the meeting at item 14, the Cabinet members were asked to confirm that they had read the report and recommendations which included this information]

- There was a tariff for where electric vehicles of £21 per vehicle

- 54,000 residents had been directly targeted during the consultation, with only 5% responding. There had been significant efforts to encourage people to respond to the survey and the Council knew that 16000 people checked the website and 2000 had responded to object. This was a survey of 50,000 people, with 36000 opening the email and 2000 people objecting.

- The Cabinet Member objected to the view that there was good diesel and bad diesel cars and referred to Oxford university research and other research that indicated that euro six vehicles were damaging and polluting. There was concern that the ULEZ scheme had not been strong enough on diesel cars and the wrong impression created that you could drive these cars.

- There were 4 neighbouring boroughs with euro six in their diesel surcharging and this helped demonstrate that the Council were not out of kilter with other London boroughs.

- Emphasised 80p to £1.20 a week increase for parking which was not significant enough to impact on people's finances when compared to cost of increased bus fees.

The Cabinet Member stated that to change behaviours and improve the response to the climate crisis, strong decisions must be made by Councils. Vehicle owners also needed to take responsibility and purchase lower polluting vehicles. To conclude, the Cabinet Member added that when residents with parking permits purchased lower emission vehicles, the Council would lose revenue due to the lower cost of the permit.

286. FEEDBACK TO THE STATUTORY CONSULTATION ON PARKING PERMITS AND CHARGES

[Clerk's note – Cllr Ibrahim left the meeting at 7.04pm]

The Deputy Leader and Cabinet Member for Neighbourhoods introduced the report which set out the results of the statutory consultation undertaken on proposed changes to parking permits and parking charges, and sought approval for the implementation of the proposals as set out in the recommendations.

The Cabinet Member advised that during the consultation process 54,000 residents had been directly targeted, and 2776 residents had objected to elements of the proposal. 374 residents had responded in support of the proposal.

The Cabinet Member referred to sections 1.2 and 6.5 of the report which set out the proposals for parking permit charges being agreed at the meeting.

The appendix at pages 220-231 set out the financial changes in real terms, which was a £10 increase per year for low emission vehicles and £20 increase per year for high emission vehicles. [Clerks note - The report at paragraph 6.5 advised that the changes consulted on include a £10 increase across all existing charge bands to help cover the cost of running the service - later in the meeting at item 14, the Cabinet Members were asked to confirm that they had read the report and recommendations which included this information.]

In response to a question from Councillor Ogiehor, the Cabinet Member agreed to investigate with the Cabinet Member for Climate Change and Sustainability and Head of Carbon Reduction how residents with off-street parking could be encouraged to switch to low emission vehicles as part of the Air Quality Action Plan.

RESOLVED

1. To consider the representations received in response to the statutory consultation on parking permits and charges as set out in paragraph 9 (consultation results) and in Appendix 1 to this report.

2. While the majority of respondents did not support the proposals consulted on, their contribution to the delivery of strategic objectives, with associated health benefits needs to be considered.

3. To agree that Cabinet authorise officers to proceed to draft the relevant Traffic Management Orders to implement the following measures as also set out in Appendix 2 by November 2020:

- A £10 increase across all existing parking permit charge bands.
- An £80 surcharge on all parking permits issued to diesel fuelled vehicles.
- A £50 surcharge on second and subsequent residential parking permits per household.
- To limit permit account holders to the use of two daily visitor permits per day.
- To increase the charge for daily Visitor Permits in all Controlled Parking Zones to £4.
- To introduce a free virtual residential parking permit for Disabled Blue Badge Holders for their home CPZ, replacing the exiting Companion Badge.
- To introduce a £20 administration fee on parking permit refunds except for visitor parking permits which shall be non-refundable.

Reasons for decision

The Council is required to consider objections and representations received in response to Statutory Consultation undertaken on any changes to parking permits and charges. Following that consideration, to decide whether to proceed to implementation of measures as set out at paragraph 3 (III) above.

Alternative options considered

Consideration was given to relying on National and Regional levers to influence car ownership and use. Those measures include the expansion of the Ultra-Low Emission Zone (ULEZ) to Haringey in 2021. However, Haringey's ambitions in terms of improving air quality require decisive local measures to be implemented. This is also considered a timely opportunity to implement measures that improve the health and well-being opportunities for all borough residents.

Consideration was given to introducing concessions for Euro 6 diesel fuelled vehicles. However, the findings from recent research confirm that these vehicle types still have high levels of harmful emissions. This is supported by the International Council on Clean Transportation who suggest that even the newest, cleanest Euro 6 diesel vehicles emit high levels of harmful nitrogen oxide. It was subsequently felt that all diesel fuelled vehicles should be subject to the surcharge.

Consideration was given to introducing the 25% diesel surcharge on on-street and car park charges from November 2020, as part of a package of measures to reduce diesel related pollutants. However, following due consideration of the feedback to the consultation, this will not be implemented at this point in time. This will also help support our town centres in their recovery from the impacts of the Covid 19 pandemic.

287. 2020/21 FINANCE UPDATE QUARTER 1

The Cabinet Member for Finance and Strategic Regeneration introduced the report which covered the Council's financial position at Quarter 1 (Period 3) of the 2020/21 financial year, include General Fund Revenue, Capital, Housing Revenue Account and Dedicated Schools Grant budgets. The Cabinet Member drew the Cabinet's attention particularly to paragraphs 1.3, 1.4, 2.2, 4.1, 5.1, 6.11, 7, 9 and 10. He added that it was critical to maintain strong financial management in the current economic climate and pandemic.

The Cabinet Member highlighted the continued and increasing pressure that the Council were facing from underfunding of the High Needs Block of the DSG since the Government's expansion of the age for Education, Health and Care Plan (EHCP) eligibility. The Council, like many other authorities across the country, had been left in a position where, despite best efforts, were unable to meet the needs of these young people within the budget that had been allocated. The Cabinet Member underlined that the additional funds provided for 2020/21 to date in no way went far enough and do not provide the sustainable solution that these young people and their families needed as was evidenced by the forecast £4.5m overspend included in the report.

The outcome of the Government's SEND review was still waiting publication and in the interim the Cabinet Member emphasised the need for the Council to continue to vocally lobby for additional resources.

- In response to a question from Cllr Ogiehor, there were ongoing risks in relation to the money spent at the start of the Covid-19 pandemic. This spending was in accordance with central government directions and further spending was expected. So far, the Council had only received in the region of £18m but were forecasting to have a greater net spend impact resulting from the pandemic than the grant allocated. There was growing concern about the risk of not receiving full reimbursement and the effect this would have on the Council's finances if it had to ameliorate this, and it was continued to hope to receive the reimbursement.

- Councillor Ogiehor spoke about the conclusion of a 4 year legal challenge in which carers working for a provider in Haringey had recently been awarded backdated earnings for not receiving the minimum wage. In response to queries about: the financial risk to the Council as a result of care workers of a council contractor paying them below the minimum wage, having assurance on care contract management arrangements and auditing care contracts to ensure no similar issues occurred in the future , the Cabinet Member advised that he would discuss this with the relevant Cabinet Member and respond to Cllr Ogiehor in due course.

- The Cabinet Member also advised that more recently, there were provisions made by the Council , during Covid 19, for home care workers, working for providers in Haringey, to receive an uplift equivalent to the London Living wage and the requirement to pay London Living Wage was also added to the new DPS home care contracts agreed at Cabinet in June.

RESOLVED

1. To note the forecast revenue outturn for the General Fund (GF), including the impact of Covid, and known and estimated levels of announced Covid funding, is a net overspend of £23.1m. This is before any further emergency grant support (Section 6, Tables 1a and 1b, and Appendix 1). This excludes the DSG forecast.

2. To note that Directors have been asked to focus on actions to bring the forecast overspend down before the end of the year.

3. To note the net Housing Revenue Account (HRA) forecast of £9.6m overspend (Section 6, Table 2, and Appendix 2).

4. To note the net DSG forecast of £4.6m overspend, the actions being taken to seek to address this and the potential implications for the GF (Section 7 and Table 3).

5. To note the forecast budget savings position in 2020/21 which indicates that 50% (£8.3m) may not be achieved. (Section 8, Table 4, and Appendix 3). This is incorporated in the GF budget pressures addressed in recommendation 3.1 above.

6. To approve the proposed budget adjustments and virements to the capital programme as set out in Table 5 and Appendix 4 and note the forecast expenditure of £251.5m in 2020/21 which equates to 43% of the revised capital budget (Section 9, Table 5 and Appendix 4).

7. To approve the budget virements as set out in Appendix 5.

8. To note the debt write-offs approved in Quarter 4 2019/20 (Appendix 6).

9. To approve the Council's income recovery practices, operative from 1 October 2020, following the temporary changes made since April of this year (Section 10).

10. To approve the approach to providing assistance to the Bernie Grant Arts Centre, as set out in section 6.17.6.

Reason for Decision

A strong financial management framework, including oversight by Members and senior management, is an essential part of delivering the Council's priorities and statutory duties. This is made more critically important than ever as a result of the severe financial duress placed on the Council by the Covid-19 crisis.

COVID-19 affects everything local authorities do – as community leaders, public health authorities, education authorities, employers, partners, and service deliverers. The Leader, Cabinet and its officers continue to need to focus on responding to the crisis while ensuring normal critical services are provided.

Alternative Options Considered

The report of the management of the Council's financial resources is a key part of the role of the Director of Finance (Section 151 Officer) in helping members to exercise their role and no other options have therefore been considered.

288. APPROVAL OF SINGLE USE PLASTICS POLICY AND ACTION PLAN

The Cabinet Member for Climate Change and Sustainability was pleased to introduce the report which sought adoption of the Single Use Plastics Policies and approval of the Single Use Plastics Action Plans. She outlined that 8 million tonnes of plastic ended up in the ocean each year, with plastic remaining a pollutant for hundreds of years. Due to the Covid-19 pandemic the use of Single Use Plastics had spiralled over the last six months (in order to maintain infection control).

The Cabinet Member outlined that there were two sections to the Action Plan – the first was to set out how the Council would show leadership and use it's procurement powers and purchaser requirements, and its own operational practices to reduce the use of single use plastics in its operations. The second Action Plan set out how the Council would continue to work with partners and empower the wider Haringey community to reduce the use of single use plastics.

In response to a question from the Leader, Joe Baker – Head of Carbon Management, advised that there had already been some changes made by the Council in the reduction of single use plastics, such as the material used for parking tickets, the provision of Council branded keep ups for purchase in the canteen and a surcharge for the use of single use cups.

The following information was provided in response to questions from Councillor Ogiehor:

- The Council had looked into installing water fountains in the borough; however, the challenge was that the costs to maintain the fountains was excessive. The GLA could install fountains and maintain these accordingly.

- It was important to ensure the policy was watertight before putting to Cabinet for approval, which was why it may feel that there had been a delay in implementation.

RESOLVED

To approve the Single Use Plastics Policies and accompanying Action Plans, attached at Appendices 1 and 2 of this report, which outlines how the Council will reduce Single Use Plastics in the Council and across the borough.

Reasons for decision

Haringey Council is committed to doing everything possible to respond to the climate emergency and improve sustainability across its own operations and in the borough of Haringey.

The policies and action plans contribute to the Place Priority of the Borough Plan, specifically objective 10 to make the borough a cleaner, accessible, and attractive place – targeting waste minimisation.

Reducing consumption across the Council's offices and the borough will save money, reduce waste, improve our environment, and decrease the amount of harmful plastics ending up in the world's oceans or in landfill.

The Single Use Plastics (SUPs) Policies and accompanying Action Plans represent a step towards this by outlining exactly what the Council will be doing to reduce reliance on SUPs within its own offices, on Haringey Council owned land, in Haringey schools, and across the borough.

Haringey Council has already taken bold steps to reduce SUPs, such as working with the North London Waste Authority (NLWA) on a low-plastic zone in Crouch End, reducing SUPs in Council offices and getting businesses signed up to refill schemes.

Alternative options considered

Do Nothing

This was rejected as it would not comply with the Borough Plan, specifically objective 10 to make the borough a cleaner, accessible, and attractive place – targeting waste minimisation.

Do a Council plan only

This was rejected, as the Council is well placed to help reduce SUPs beyond its own organisation. To only focus on plastics the Council directly uses would miss opportunities, such as SUPs at events, SUPs in schools and SUPs used by the Council's partners.

Do a Borough plan only

This was rejected as the Council can learn from its own experience of reducing SUPs to inform the most effective ways to work in the borough. The Council would not want to offer advice on reducing SUPs if it could not demonstrate its own efforts to reduce SUPs.

289. NEIGHBOURHOOD MOVES SCHEME

[Clerk's note Cllr Ibrahim returned to the meeting at 7.25pm]

The Cabinet Member for Housing and Estate Renewal introduced the report which sought approval for a consultation to amend the Housing Allocations Policy to allow for a Neighbourhood Moves Scheme. The Neighbourhood Moves Scheme would apply automatically on any new housing development with 5 or more new Council rented homes unless Cabinet made the decision to exclude a new housing development. The proposed Scheme would give existing Council tenants priority for new homes that are built in their neighbourhood, particularly those who are living in homes which are too big or too small.

RESOLVED

1. To note the Equalities Impact Assessment at Appendix 1.
2. To note the proposed alterations to the Housing Allocations Policy attached at Appendix 2.
3. To note the Draft Neighbourhood Moves Scheme attached at Appendix 3 which will be attached to the Housing Allocations Policy.
4. To approve a consultation on these proposed amendments to the Housing Allocations Policy.

5. To delegate approval of the Consultation Documents to the Director of Housing, Regeneration and Planning in consultation with the Cabinet Member for Housing and Estate Renewal.

6. To note that following consideration of the consultation responses, a second Cabinet report will be submitted to give final approval of the amendments to the Allocations Policy.

Reasons for decision

The proposed changes will honour the Estate Renewal Rehousing and Payments Policy, as well as seek to address over-crowding by releasing larger family homes which are under-occupied and allowing over-crowded households to move locally. It will also support community cohesion.

Recommendation 3.2 is required to allow changes to be made to the Housing Allocations Policy.

Alternative options considered

An alternative option is to consult on a Local Lettings Plan for each scheme individually. This is not recommended because there are a large number of schemes in the development pipeline, and consulting on a Local Lettings Plan for each scheme individually is not practical.

Another alternative option is not to apply the Neighbourhood Moves Scheme on new Council housing. This was rejected because, firstly, this Scheme will help address both under-occupancy and over-crowding, and secondly because it will allow residents to benefit from new Council housing being built in their local area.

290. HOUSING OPTIONS AT 500 WHITE HART LANE TO SUPPORT HIGH ROAD WEST SCHEME

The Cabinet Member for Housing and Regeneration introduced the report which offered Love Lane resident leaseholders the opportunity to acquire a property on 500 White Hart Lane site with a reduced equity requirement. This allowed the Council to maximise rehousing options for leaseholders and directly deal with affordability concerns.

The Cabinet Member reiterated that the Council was committed to working with leaseholders to identify rehousing solutions that met their needs. The Council understood that Love Lane Estate leaseholders had concerns about their current and future homes and faced some difficult decisions about whether to stay in the area or purchase a new home now outside of the Estate. The Council also understood that no two households were the same and each household would have different needs and varying financial positions.

It was noted that the Cabinet had made a decision in March 2020 to agree a new High Road West leaseholder offer for consultation with leaseholders, which proposed an enhanced equity loan for new properties within the High Road West Scheme. It was noted that it was also for these reasons, that the attached report sought authority to offer Love Lane resident leaseholders shared equity loans with a lower threshold requirement at 500 White Hart Lane.

Further to considering a response to the leaseholder's concerns at item 24 and exempt information at item 25,

RESOLVED

1. To agree that the intermediate properties at 500 White Hart Lane be offered for sale to the resident leaseholders on the Love Lane Estate who wish to sell their property to the Council: and

2. To give delegated authority to the Director of Housing, Regeneration and Planning and the Director of Finance to agree any individual equity loans to those resident leaseholders subject to:

a) the resident leaseholder contributing the full market value of their current home plus home loss payment where this is possible; and
b) the equity requirement to qualify for a Portable Equity Loan be within the agreed cost envelope set out in the EXEMPT report which permits equity amounts below the 60% level.

3. To give delegated authority to the Director of Housing, Regeneration and Planning to agree, in consultation with the Cabinet Member for Housing and Estate Renewal, the marketing strategy for any intermediate properties at 500 White Hart Lane, that are not acquired by Love Lane resident leaseholders and to dispose of these properties in accordance with that strategy.

Reasons for decision

The reason for this decision is to ensure that the Council can keep its commitments to resident leaseholders on the Love Lane Estate, to maximise their rehousing choice and provide affordable rehousing options.

As described in paragraph 6.9 below, the Council's Estate Renewal Rehousing and Payments Policy (the ERRPP) sets out the Council's minimum commitments to residents affected by regeneration schemes. For resident leaseholders it details the arrangements of equity loans, which aim to help them acquire new homes by providing additional finance, which is only repayable upon the subsequent sale of the property or the death of the leaseholder.

The ERRPP normally requires resident leaseholders to contribute 60% of the equity of the new home they wish to acquire to qualify either for an equity loan in the renewal area or (the "portable equity loan") elsewhere in the borough. The resident leaseholder must contribute the full market value of their current home plus the Home Loss payment.

The ERRPP also requires that any additional contribution by the leaseholder beyond 60% must go to increase the leaseholder's equity share in the replacement property, thereby setting a maximum value of the replacement home of 1.83 times the value of the leaseholder's current home. If this is greater than the borough-wide upper quartile house price, that latter becomes the maximum value of the replacement home.

Recent valuations of both the new homes at 500 White Hart Lane and of properties on the Love Lane Estate have suggested that the some resident leaseholders may not be able to raise the 60% equity requirement for an equivalent size home at 500 White Hart Lane and that therefore some properties at 500 White Hart Lane may exceed these maximum replacement home values. This would mean that some of the homes could be unaffordable, hence the proposal outlined below.

The ERRPP does however allow for individual schemes to offer a lower minimum equity share, and therefore a higher maximum replacement home value. Officers recommend setting a lower minimum equity requirement where a resident leaseholder on Love Lane cannot afford to contribute 60% of the value of the new home at 500 White Hart Lane. This will ensure that the Council meets its commitment to provide

affordable rehousing options for Love Lane resident leaseholders as well as maximising rehousing choice.

Should Love Lane resident leaseholders not wish to take up the offer of a property at 500 White Hart Lane, the Council needs to make sure it makes best use of these intermediate properties. As such, a marketing strategy will be required to ensure that any surplus properties are marketed to those who the Council believes has the greatest need for the homes. This could include other resident leaseholders affected by estate renewal schemes. For this reason, this report also seeks a delegated authority for the Director of Housing, Regeneration and Planning to agree, in consultation with the Cabinet Member for Housing and Estate Renewal, the marketing strategy for any intermediate properties at 500 White Hart Lane, which are not acquired by Love Lane resident leaseholders.

Alternative options considered

Not to offer an equity loan

If the Council choose not to offer an equity loan on the purchase of these units, it is unlikely that they would be affordable to Love Lane resident leaseholders. This is because the cost of the new homes will be higher than the value of the leaseholders' current property on the Love Lane Estate. This would mean that 500 White Hart Lane would not help the Council to meet its commitments to resident leaseholders on the Love Lane Estate.

To offer an equity loan under ERRPP terms but not with the option of a lower equity share from the leaseholder

The Council could choose to offer an equity loan on the purchase of these units only where the value of the current property plus 10% Home Loss equals 60% of the new property and not with a lower minimum equity share where necessary. This may mean that some resident leaseholders from the Love Lane Estate that wish to purchase a property at 500 White Hart Lane are not able to.

291. UPDATE ON COUNCIL OWNED SITES IN WOOD GREEN

The Cabinet Member for Finance and Strategic Regeneration introduced the report which set out the work underway to develop a long-term strategy to make the best use of Council owned sites in Wood Green and described the impact of the current Covid 19 pandemic on the programme.

It was noted that , prior to Covid 19, work was underway to prepare a business case for redeveloping the Library site to include a new library and customer services, office accommodation, and potentially additional services including democratic space and a Leisure Centre. The Council had also been considering longer term options for the Civic Centre, keeping in mind its listing, as part of the accommodation strategy.

The Cabinet Member outlined that the Covid 19 crisis has meant that the Council has had to take a step back and pause while the longer-term effect and requirements were

reviewed. This was possible now with the recent acquisition of Alex House which met the Council's short- and medium-term accommodation needs.

It was noted that from consultation with residents, businesses and stakeholders, there was interest in changing Wood Green. The Council was a major landowner and needed to play a key role. The report set out pending decisions about Council accommodation property in the town centre which could lead to better use of Council land to support existing and new communities. The report further set out a timetable for decisions to be made about Council owned sites in the medium term.

In response to questions from Cllr Ogiehor and Cllr Mitchell, the following information was provided:

- In relation to the timelines for hoardings remaining on the Civic Centre site, these could in place until 2024 to allow the required internal and external works to be undertaken on the building.

- With regards to considering the future use of the Civic Centre site and allowing community groups to hire use of the rooms, this would be considered as part of the accommodation strategy and the specific work on locality with partners. This included considering opportunities for partner organisations and businesses to co-locate. It was hoped that the Civic Centre could be used to facilitate community groups, council use, civic duties, and meetings.

- The Cabinet Member was not aware of any specific issue concerning the wider surrounds of George Meehan House as indicated in appendix 2 of the report. There had been longstanding concern about the physical state of an adjourning building and a further building at back of the site which backed onto the car park of the premises. Additional information about the assessment of this issue could be provided by the Director for Customers, Transformation and Resources.

- With regards to Blue House Yard, there were a number of works that needed to be completed and the Council were engaging with users of the site. The Council were taking forward several 'meanwhile' use projects to ensure that businesses thrived. It was hoped that the work on Blue House Yard provided the businesses with as much support as required.

- With regards to expenditure on River Park House accommodation and overall consideration of the Councils buildings in Wood Green, the purpose of the report emphasised that it was good business sense to review the accommodation plans that the Council had prior to Covid and the Council were already in the process of commissioning feasibility work to be completed on sites.

- Due to Covid 19, Councillors were not able to visit other boroughs which had completed a review of their accommodation. However, there were plans for an all member briefing which would provide further information to be shared.

- There were further floors on River Park House that needed to have works completed and although this required resources to be applied when the overall future of the building was not yet agreed, it was still important to take forward this work as the Council had a fiduciary duty to ensure that all assets and resources were used in an appropriate manner.

- Essentially the attached report was, at this stage, providing officers with the opportunity to carry out a review and consider the various buildings within the Wood Green area and how the council can use them as well as put them to better use.

- The Cabinet Member for Local Investment and Economic Growth commented and gave assurance that he fully understood the support that would be required to businesses in Blue House Yard and he had taken forward engagement activities with the business holders, including highlighting access to the discretionary business grant support . He was happy to work with the Cabinet Member for Finance and Strategic Regeneration and Officer team to ensure that the long-term future of Blue House yard, either on this site or on a similar site.

RESOLVED

1. To note the timetable for consideration of the accommodation strategy by Cabinet.

2. To note the action being taken now to temporarily protect the Civic Centre pending a decision about future investment.

Reasons for decision

In July 2019,Cabinet agreed to the principle of consolidating Council accommodation in Wood Green and work has been progressing to develop this in detail including a possible new building on the Library site and options for the Civic Centre and whether to retain it for Council use.

However, since July 2019, a number of events have taken place which mean that the business case for new accommodation needs to be reviewed, including the recent acquisition of Alex House and Covid 19 experience which has changed some of the assumptions which fed into the business case about accommodation requirements.

The condition of the current corporate buildings in Wood Green varies from fair to extremely poor. It is anticipated that should the Council decide to consolidate to one or two buildings, this will take 5-7 years to deliver in full. Therefore, a review is taking place of occupation of existing building and of short to medium term investment needs to make sure buildings are fit for purpose for that period, and a study of opportunities to vacate some buildings and potentially realise commercial income.

This report sets out a summary of the high-level medium-term strategy for Council owned sites in Wood Green and a timetable for decisions relating to each site.

In March 2020, the Civic Centre was closed for safety reasons. It is necessary to prevent further damage to the Civic Centre by protecting it pending works to repair it, this report sets out the immediate protection measures which are being carried out.

Alternative options considered

Reports which are for information or noting and do not involve any actions being agreed do not require this section to be completed.

292. REPORT ON THE FINDINGS OF AN OMBUDSMAN INVESTIGATION WHERE A REPORT HAS BEEN ISSUED - NON KEY

The Cabinet Member for Housing and Estate Renewal introduced the report which appended a report from the Housing Ombudsman in June 2020 which had found the Council at fault with regard to a resident's homelessness application.

The Cabinet Member placed on record her apology to Ms B for the distress caused by the Council's failings. She was glad to note that Ms B has been financially compensated and was now being housed in a suitably sized home let by the Haringey Community Benefit Society. The Cabinet Member was glad that the Council has taken the opportunity to learn from this incident and has taken steps to ensure that this mistake did not reoccur.

RESOLVED

1. To accept the findings and recommendations of the Ombudsman in the report shown at Appendix 1.

2. To note and approve officers' compensatory payments to Ms B totalling £5,304.37, as set out in paragraph 6.14 below.

3. To adopt this report as the Council's formal response under s.31 Local Government Act 1974, to be communicated to the Ombudsman.

4. To adopt this report as the Cabinet's formal response as required by s.5A Local Government and Housing Act 1989, for distribution to all members and the Monitoring Officer.

Reasons for decision

As set out in the Ombudsman's report, Ms B has been found to have suffered injustice as a result of faults on behalf of the Council.

Where a report such as this is made by the Ombudsman, it must be laid before the authority (s.31 Local Government Act 1974). In cases such as this where the Council is operating executive arrangements, "the authority" means the executive, i.e. Cabinet (s.25(4ZA) Local Government Act 1974).

Alternative options considered

The Ombudsman cannot force the Council to follow its recommendations, but local authorities generally do follow them.

If the Ombudsman is not satisfied with the Council's response, he will make a further report explaining this and making recommendations. He can also require the Council to make a public statement about the matter.

Therefore, Cabinet could choose to reject any of the recommendations made by the Ombudsman.

However, this alternative is not recommended because the Ombudsman's recommendations represent an appropriate remedy for the reasons set out above.

293. RISK BASED VERIFICATION POLICY (RBV)

The Cabinet Member for Corporate and Civic services introduced the report which set out the requirement for an annual review of the RBV policy. Given the impact of Covid-19, the Government had issued advice and a decision from Cabinet was being sought on whether or not to adopt that advice.

It was noted that the Risk Verification System used a software that determined the level of checks that needed to be carried out when a resident makes a claim for Council tax benefit reduction or housing benefit. It was noted that since November 2019, the use of the software had reduced the number of letters asking applicants for more information for claims .This had been the source of complaint for residents over the years as it caused delays and now having the software increased the speed of the process for considering benefit claims.

The Cabinet Member emphasised that the automated system did not have a role in deciding whether a claim was awarded or not and this decision was made by an officer. It was also noted that since the introduction of the system, no claimant had been asked for further information and many were being asked for less.

In light of the Covid 19, the DWP had suspended the need to review the policy by local authorities and the decision being considered was whether or not to adopt that advice.

Following questions from Cllr Mitchell, the following information was provided:

- With regards to a review of the policy, this was introduced in November 2019, and the advice from the government was that the Council should not be carrying out a review at this time. This review would likely take place in the middle of next year.

- It was reiterated that the software had provided significant improvements over the course of the year in the processing of claims. There was no impact on the assessment of claims, even the high-risk claims, from this software and the Council were externally and internally audited on an annual basis.

- The audit results were considered at Corporate Committee on an annual basis. These were assessed in year, in terms of error rates, in relation to the distribution of housing benefit, overpayments and the software had made a significant improvement to these rates.

- Assurance was provided that the software does not discriminate claimants from protected characteristic groups. It considered the types of claims and where there is a change of circumstances and allowed for a simple claim form to be completed without the need to provide the same level of information as making a new claim.

- With regards to low, medium, and high types of claims, it was noted that low risk applicants will often be those in receipt of tax welfare benefits and where the Council can access the DWP system. The applicant does not need to provide verification and their claims can be processed quite quickly.

- Medium and high-risk categories related to the complexity of the information provided and were often concerned with household income composition and individual income to be assessed.

- There was monthly performance analysis of the changes to circumstances claims to allow any changes to be considered such as overpayments that could occur or to understand if there are anomalies and allow further background information to be checked. There were also quality checks completed on cases to provide additional assurance.

- Part of the equalities comments were assessed to be confidential information by Legal services and added to the exempt part of the report and further details would be provided in the exempt part of the meeting. It was agreed that the Head of Legal would provide a broader response to the query from Cllr Mitchell after the meeting.

Further to considering the exempt information at item 26,

RESOLVED

As set out in the Part B exempt report

As set out in the Part B exempt report

Reasons for decision

To continue to help reduce fraud and error in the processing of Benefit claims.

As set out in the Part B exempt report

Alternative options considered

For the reasons contained in the report, no other option was considered.

294. APPROVAL OF CONSTRUCTION CONTRACT FOR ST MARY'S CLOSE AND NIGHTINGALE LANE

The Cabinet Member for Housing and Estate Renewal introduced the report which sought approval to appoint the recommended contractor to complete a new build development of five Council rented homes; two at St Mary's Close N17 and three at Nightingale Lane N8, and to appropriate the land for planning purposes to facilitate the development process.

It was noted that on approval, these developments would be the seventh and eighth scheme to move to a start on site, of the 58 schemes in the Council housing delivery programme that the Council intends to directly deliver itself. It will be the twelfth and thirteenth schemes to move to a start on site in the overall programme.

Five new Council homes in two wards – two three-bedroom homes and three two-bedroom homes – meant that five households who are not currently adequately housed would be living in homes that met their needs.

Further to considering exempt information at item 27,

RESOLVED

1. To approve the appointment of Cosmur Construction Limited to undertake the new build works to provide a total of five Council rented homes at St Mary's Close and Nightingale Lane for a total contract sum of £1,348,437.49 and to approve the client contingency sum set out in the exempt part of the report.

2. To approve the appropriation of the land at St Mary's Close and Nightingale Lane (edged red in the plans attached at Appendix 1) from housing purposes to planning purposes under Section 122 of the Local Government Act 1972 as they are no longer required for the purpose which they are currently held, and for the purpose of carrying out development as set out in paragraphs 6.1 to 6.27 of this report.

3. To approve the use of the Council's powers under Section 203 of the Housing and Planning Act 2016 to override easements and other rights of neighbouring

properties infringed upon by the St Mary's development, under planning permission Ref: HGY/2020/0136 and by Nightingale Lane development, under planning permission Ref: HGY/2020/0159.

4. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for Housing and Estate Renewal, authority to make payments of compensation as a result of any infringement arising from the development and the recommendation 3.1.3, within the existing scheme of delegation.

5. To approve the appropriation of the land at St Mary's Close and Nightingale Lane (edged red in the plans attached at Appendix 1) from planning purposes back to housing purposes under Section 19 of the Housing Act 1985, after practical completion of the development on 31 December 2021.

Reasons for decisions

St Mary's Close and Nightingale Lane was approved by Cabinet on 9 July 2019 to be included in the Council housing delivery programme. This scheme has subsequently been granted planning consent and is ready to progress to construction. This report therefore marks the third, and final, Member led decision to develop these two sites.

Following a formal tender process, a contractor has been identified to undertake these works.

The appropriation of the site for planning purposes is required as it will allow the Council to use the powers contained in Section 203 to override easements and other rights of neighbouring properties and will prevent injunctions that could delay or prevent the Council's proposed development. Section 203 converts the right to seek an injunction into a right to compensation. The site will need to be appropriated back from planning purposes to housing purposes on completion of the development to enable the Council to use the land for housing and let five new Council homes at Council rent.

The new development at St Mary's Close and Nightingale Lane will also allow the Council to regenerate the land, helping to reduce the anti-social behaviour currently attracted to the sites, improving the security and aesthetics for the surrounding existing residents. In addition, the development will help support delivery of the Borough Plan, Priority 1: "Our vision is for a safe, stable and affordable home for everyone, whatever their circumstances".

Alternative options considered

It would be possible not to develop these sites for housing purposes. However, this option was rejected as it does not support the Council's commitment to deliver a new generation of Council homes.

This opportunity was procured via a direct appointment from the London Construction Programme (LCP) Major Works 2019 Framework Agreement, the recommended route for a contract of this value. An alternative option would have

been to run a competitive tender from the LCP, but this option was rejected due to limited interest from the framework contractors.

The Council could continue with these schemes without appropriating the site for planning purposes, but this would risk the proposed development being delayed or stopped by potential third party claims. By utilising the powers under Section 203 of the Housing and Planning Act 2016 (HPA 2016), those who benefit from third party rights will not be able to seek an injunction. Making use of this power allows the Council to override these third rights and allows the third party to make a claim for compensation only The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments is established. The housing delivery team actively engaged with residents about the development of these sites as they proceeded through the feasibility and design stages and any comments or objections raised were taken into consideration by Planning Committee in reaching its decision. For these reasons, this option was rejected.

The Council could decide not to appropriate the land for housing purposes upon practical completion of the building works. This option was rejected because it could prevent the Council from being able to offer up these homes for occupation as social housing thereby not supporting the delivery of much needed affordable homes.

295. APPROVAL OF CONSTRUCTION CONTRACT FOR POYNTON ROAD

The Cabinet Member for Housing and Estate Renewal introduced the report which sought approval to appoint the recommended winning contractor to complete a new build development of two Council rented three-bedroom family terraced homes at Poynton Road N17 and to appropriate the land for planning purposes to facilitate the development process.

It was noted that on approval, this development will be the sixth scheme to move to a start on site, of the 58 schemes in the Council housing delivery programme that the Council intends to directly deliver itself. It will be the eleventh scheme to move to a start on site in the overall programme.

The Cabinet Member outlined that Poynton Road was currently housing derelict buildings, since 2014 when they ceased to be used as retail units. The Council's intervention would turn an eyesore plagued by anti-social behaviour into two new family terraced homes for Council rent.

Further to considering exempt information at item 28,

RESOLVED

1. To approve the appointment of the recommended winning contractor set out in the exempt Appendix 2 to undertake the new build works to provide a total of two Council rented homes at Poynton Road for a total contract sum of £673,377.00 and to approve the client contingency sum set out in the exempt part of the report.

2. To approve the appropriation of the land at Poynton Road (edged red in the plans attached at Appendix 1) from housing purposes to planning purposes under Section 122 of the Local Government Act 1972 as they are no longer required for the purpose which they are currently held, and for the purpose of carrying out development as set out in paragraphs 6.1 to 6.27 of this report.

3. To approve the use of the Council's powers under Section 203 of the Housing and Planning Act 2016 to override easements and other rights of neighbouring properties infringed upon by the Poynton Road development, under planning permission Ref: HGY/2020/0182.

4. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for Housing and Estate Renewal, authority to make payments of compensation as a result of any infringement arising from the development and the resolution 3.1.3, within the existing scheme of delegation.

5. To approve the appropriation of the land at Poynton Road (edged red in the plans attached at Appendix 1) from planning purposes back to housing purposes under Section 19 of the Housing Act 1985, after practical completion of the development on 31 December 2021.

Reasons for decisions

Poynton Road was approved by Cabinet on 9 July 2019 to be included in the Council housing delivery programme. This scheme has subsequently been granted planning consent and is ready to progress to construction. This report therefore marks the third, and final, Member led decision to develop these two sites.

Following a formal tender process, a contractor has been identified to undertake these works.

The appropriation of the site for planning purposes is required as it will allow the Council to use the powers contained in Section 203 to override easements and other rights of neighbouring properties and will prevent injunctions that could delay or prevent the Council's proposed development. Section 203 converts the right to seek an injunction into a right to compensation. The site will need to be appropriated back from planning purposes to housing purposes on completion of the development to enable the Council to use the land for housing and let two new Council homes at Council rent.

The new development at Poynton Road will also allow the Council to redevelop and secure the premise alleviating the anti-social behaviour currently attracted to the site and helping to improve security for the surrounding existing residents. In addition, the development will help support delivery of the Borough Plan, Priority 1: "Our vision is for a safe, stable and affordable home for everyone, whatever their circumstances".

Alternative options considered

It would be possible not to develop this site for housing purposes. However, this option was rejected as it does not support the Council's commitment to deliver a new generation of Council homes.

This opportunity was procured via a competitive tender from the Councils London Construction Programme (LCP) Dynamic Procurement System (DPS) for minor works, the recommended route for a contract of this value. An alternative option would have been to run a competitive tender via the Council's LCP Major Works Framework, but this option was rejected as this framework can only be utilised for works from £1m+.

The Council could continue with the scheme without appropriating the site for planning purposes, but this would risk the proposed development being delayed or stopped by potential third party claims. By utilising the powers under Section 203 of the Housing and Planning Act 2016 (HPA 2016), those who benefit from third party rights will not be able to seek an injunction. Making use of this power allows the Council to override these third rights and allows the third party to make a claim for compensation only. The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments is established. The housing delivery team actively engaged with residents about the development of these sites as they proceeded through the feasibility and design stages and any comments or objections raised were taken into consideration by Planning Committee in reaching its decision. For these reasons, this option was rejected.

The Council could decide not to appropriate the land for housing purposes upon practical completion of the building works. This option was rejected because it could prevent the Council from being able to offer up these homes for occupation as social housing thereby not supporting the delivery of much needed affordable homes.

296. AWARD OF CONTRACT FOR EXTERNAL MAJOR WORKS TO IMPERIAL WHARF ESTATE

The Cabinet Member for Housing and Estate Renewal introduced the report which sought approval for an award of a contract to contractor A to carry out external major works on the Imperial Wharf Estate.

The proposed works to Imperial Wharf will bring all homes on the estate up to the full Decent Homes Standard as well as ensure compliance with current fire and building regulations. The overall project will contribute to helping to achieve the Borough Plan objectives for housing which include delivering Decent Homes, ensuring all homes are safe and improving resident satisfaction, as set out in more detail in section 10 of the report.

In addition, following extensive consultation with residents, residents will benefit from an improved estate environment that includes designing out crime measures to tackle anti-social behaviour. The aim for this project is to achieve the Silver Award which is a Police initiative that recognises physical security standards have been incorporated into works to prevent crime and anti-social behaviour. The Designing Out Crime Team will attend site to inspect and sign off each block and on successful completion of the works, the Imperial Estate will achieve the Silver Award. The Award would be presented by the Metropolitan Police Designing Out Crime Officer.

Further to considering exempt information at item 29,

RESOLVED

1. Pursuant to the Council's Contract Standing Order (CSO) 9.07.1(d), for to approve the award of a contract of £4,200,594.50 to the preferred contractor identified in exempt Appendix A for the installation of flat roof covering, windows, resident and main entrance communal doors, external brickwork repairs, fire protection works, redevelopment of children play area and associated estate improvements. This will incorporate the communal internal and external areas of the Imperial Wharf Estate as follows: 228 -270, 304-346 & 378-442 Craven Park Road, 1,2,3,5,6,7,8, 32-51 Maple Close.

2. To approve the issue of a letter of intent for an amount of up to, but not exceeding £420,059.45, which represents 10% of the contract sum.

3. To approve the total professional fees of £323,277.75, which represents 7.7% of the contract sum.

4. To note the total project costs of £4,523,872.25.

Reasons for decision

Homes for Haringey requires Cabinet approval to award the contract for the installation of flat roof covering, windows and rear door replacement, resident front entrance doors and main entrance communal doors, external brickwork and concrete repairs, fire protection works, drainage repairs, internal and external decorations, emergency lighting, bins store and recycling storage, resurface walkway and upstands, replacement of paving to identified areas redevelopment of the children's play area, landscaping and associated estate improvements. This will incorporate the communal and external areas of the Imperial Wharf Estate. This will enable essential safety works to commence and the estate to be brought up to the Decent Homes Standard.

The tender process was carried out in accordance with the framework requirements that incorporate price and quality. The successful compliant bidder scored the highest in relation to these criteria in the associated lot 1.1B.

Alternative options considered

An alternative option would be for Homes for Haringey to use third party industry frameworks or an OJEU compliant tender process to deliver the construction works to the Imperial Wharf Estate. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined the London Construction Programme framework as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that focus their resources in the local area.

A do-nothing option would mean the Council is not able to deliver external capital investment works to bring the estate up to the Decent Homes Standard, in accordance with the Asset Management Strategy 2018-23.

297. AWARD OF CONTRACT FOR EXTERNAL MAJOR WORKS TO THE TURNER AVENUE ESTATE

The Cabinet Member for Housing and Estate Renewal introduced the report which sought approval for the award of a contract to contractor A to carry out external major works on the Turner Avenue Estate.

The proposed works to Turner Avenue will bring all homes on the estate up to the full Decent Homes Standard as well as ensure compliance with current fire and building regulations. The overall project will contribute to helping to achieve the Borough Plan objectives for housing which include delivering Decent Homes, ensuring all homes are safe and improving resident satisfaction, as set out in more detail in section 10 of the report.

In addition, following extensive consultation with residents, residents will benefit from an improved estate environment that includes designing out crime measures to tackle anti-social behaviour. The aim for this project is to achieve the Silver Award which is a Police initiative that recognises physical security standards have been incorporated into works to prevent crime and anti-social behaviour. The Designing Out Crime Team will attend site to inspect and sign off each block and on successful completion of the works, the Turner Avenue Estate will achieve the Silver Award. The Award will be presented by the Metropolitan Police Designing Out Crime Officer.

After considering exempt information at item 30,

RESOLVED

1. Pursuant to the Council's Contract Standing Order (CSO) 9.07.1(d), to approve the award of a contract to the preferred contractor identified in exempt Appendix A for the installation of flat roof covering, windows, resident and main entrance communal doors, external brickwork and concrete repairs, fire protection works, drainage repairs, communal internal and external decoration, emergency lighting and boundary walls to the Turner Avenue Estate. This will be for the sum of £2,608,320.63.

2. To approve the issue of a letter of intent for an amount of up to, but not exceeding £260,832.63, which represents 10% of the contract sum.

3. To approve the total professional fees of £216,229.78 which represents 8.29% of the contract sum.

4. To note the total project costs of £2,824,550.41.

Reasons for decision

Homes for Haringey requires Cabinet approval to award the contract for the installation of flat roof covering, windows, resident and main entrance communal doors, external brickwork and concrete repairs, fire protection works, drainage repairs, communal internal and external decorations, emergency lighting and boundary walls to the Turner Avenue Estate. This will enable essential safety works to commence and for properties to be brought up to the Decent Homes Standard. This is following a tender process undertaken in conjunction with Haringey Council's Procurement team via the London Construction Programme (London Construction Programme) framework and processes.

The tender process was carried out in accordance with the framework requirements that incorporate price and quality. The successful compliant bidder scored the highest in relation to these criteria in the associated lot 1.1B.

Alternative options considered

An alternative option would be for Homes for Haringey to use third party industry frameworks or an OJEU compliant tender process to deliver the construction works to the Turner Avenue Estate. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined the London Construction Programme framework as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that concentrate their resources in the local area.

A do-nothing option would mean the Council is not able to deliver external capital investment works to bring the estate up to the Decent Homes Standard, in accordance with the Asset Management Strategy 2018-23.

298. MINUTES OF OTHER BODIES

RESOLVED

To note the minutes of the following:

Urgent decision 27/07/2020
Urgent decision 10/08/2020
Cabinet Signing 24/08/2020
Urgent decision 28/08/2020
Urgent decision 4/09/2020

299. SIGNIFICANT AND DELEGATED ACTIONS

RESOLVED

To note the significant and delegated actions taken in July to August.

300. NEW ITEMS OF URGENT BUSINESS

Before entering the exempt part of the meeting, the Cabinet Member for Housing and Estate Renewal provided the following information in response to concerns that had been raised by a Love Lane Leaseholder for Cabinet to note and consider, prior to considering the exempt report on Housing Options at 500 White Hart Lane to support the High Road West Scheme.

- This report was about maximising housing choice for Love Lane leaseholders- something the Council had committed to do in the HRW Leaseholder Guide.

- The Council could not offer old homes for new, but we can try and make these homes affordable through the equity loan arrangements. No interest was paid on the unowned equity.

- The leaseholders' properties were valued independently to ascertain the market value and an arbitration process is available if needed. The 500 WHL properties cannot be sold for under market value, but the equity loan offer could make them affordable to leaseholders.

The following responses were provided to the specific concerns raised:

- The Council is building replacement homes at High Road West for leaseholders that wish to move into them and will consult residents in the autumn on the HRW Leaseholder Offer which provides a number of rehousing options, including equity loans and leasehold swap.
- The leaseholders' properties were valued independently to ascertain the market value and an arbitration process is available if needed. This was committed to by the Council in the 2014 Leaseholder Guide and is set out in the draft Leaseholder offer.
- The leaseholders are eligible for an equity loan on a property elsewhere in Haringey to help make these homes affordable if they do not wish to move to the High Road West scheme.
- The equity loan offered at 500 White Hart Lane and on the High Road West scheme would be interest free and does not need to be repaid unless the property is sold or transferred.
- The terms of the equity loan as set out in the ERRPP are that the Equity Loan will need to be repaid when the property is transferred to another owner unless the property is inherited by the leaseholder's spouse, civil partner or a person living with them as their husband or wife.
- There are affordable housing conditions that require the Council (or any registered provider) to sell the units according to a valuation which is less than 3 months old, so the council would not be legally able to sell these flats below this value.

301. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as the remaining items contained exempt information as defined under paragraph 3 and 5 of Part 1 schedule 12A of the Local Government Act 1972.

302. EXEMPT - HOUSING OPTIONS AT 500 WHITE HART LANE TO SUPPORT HIGH ROAD WEST SCHEME

As per item 289 and the exempt minutes.

303. EXEMPT - RISK BASED VERIFICATION POLICY (RBV)

As per the exempt minutes and item 293.

304. EXEMPT - APPROVAL OF CONSTRUCTION CONTRACT FOR ST MARY'S CLOSE AND NIGHTINGALE LANE

As per item 294 and the exempt minutes.

305. EXEMPT - APPROVAL OF CONSTRUCTION CONTRACT FOR POYNTON ROAD

As per item 295 and the exempt minutes.

306. EXEMPT - AWARD OF CONTRACT FOR EXTERNAL MAJOR WORKS TO IMPERIAL WHARF ESTATE

As per item 296 and the exempt minutes.

307. EXEMPT - AWARD OF CONTRACT FOR EXTERNAL MAJOR WORKS TO THE TURNER AVENUE ESTATE

As per item 297 and the exempt minutes.

308. EXEMPT CABINET MINUTES

RESOLVED

To approve the exempt minutes of the meeting held on the 14th of July 2020.

309. NEW ITEMS OF EXEMPT URGENT BUSINESS

None

CHAIR: Councillor Joseph Ejiofor

Signed by Chair ……..

Date ……

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Report for: Cabinet 13 October 2020

Title: Scrutiny panel review of Blue Badges and Supporting Better Access to Parking for Disabled People

Report authorised by: Director of Environment and Neighbourhoods, Stephen McDonnell.

Lead Officer: **Ann Cunningham,** Head of Highways and Parking ann.cunningham@haringey.gov.uk, 0208 489 1355.

Ward(s) affected: All

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

1. Describe the issue under consideration

1.1 This report sets out the formal response to the recommendations arising from the Environment and Community Safety (E&SC) Scrutiny review of the administration of the Disabled Blue Badge Scheme. The report Disabled Blue Badges and Supporting Better Access to Parking for Disabled People was agreed by Overview and Scrutiny on 22 June 2020.

2. Cabinet Member Introduction

2.1 I was keen to involve the Environment and Community Safety scrutiny panel in many of the changes being implemented to parking operational policy and processes. While the parking transformation programme is an accelerated development programme, it is important that changes and new developments are prioritised and targeted where needed most.

2.2 I welcome the review of the Disabled Blue Badges Scheme and how access can be improved. I also appreciate the responsiveness of the scrutiny panel who included this review at a late stage in their very busy schedule. I am happy to recommend the majority of their recommendations to Cabinet. I look forward to working closely with the service in implementing those recommendations and measuring and monitoring the outcomes achieved.

3 Recommendations

3.1 It is recommended that Cabinet agrees to;

i. Note the outcome of the Scrutiny panel review of Blue Badges and Supporting Better Access to Parking for Disabled People, as detailed in appendix 1 to this report.

ii. Proceed with the recommendations regarding the Council's blue badge scheme as set out in appendix 2. And agree all recommendations except recommendation 11 and 12 which are not agreed.

iii. Note that recommendations 16 and 21 are also to be agreed in part and the proposed responses to those recommendations in appendix 2 to this report.

4 Reasons for decision

4.1 The recommended actions set out in this report support the work being undertaken to improve the service offer to motorists with disabilities. Those actions will help streamline processes, increase self-serve options as well as protecting the dedicated spaces made available on the public highway for those users.

5 Alternative options considered

5.1 In addressing the recommendations set out by the E&CS Scrutiny Panel several actions were considered. This report provides what are considered to be the most effective actions. Therefore, alternative options have not been considered at this point. These actions will be however be refined if required during implementation to ensure that the right outcomes are achieved.

6 Background information

6.1 The Disabled Blue Badge scheme provides a national range of on-street parking concessions, providing free parking without a time limit in otherwise restricted environments. The scheme also allows parking for up to 3 hours on yellow line restricted streets, unless a loading ban applies. These concessions exist to help those who qualify under the scheme to park close to local services and facilities.

6.2 The Department for Transport (DfT) is responsible for the legislation that sets out the framework for the Scheme, including associated guidance and for sharing good practice.

6.3 It is the role of Local Authorities to manage the day-to-day administration policies and procedures, and to support the assessment, local provisions, and enforcement services to ensure customers are:

- Treated fairly and consistently
- Provided with a timely and cost-effective service, and
- That processes are resistant to abuse

6.4 An operational review of the disabled parking offer was concluded last year, which resulted in the following changes.

- Introduction of dedicated disabled parking bays
- The revision of the eligibility criteria
- The introduction of an appeals process for unsuccessful disabled bay applications.

6.5 The Blue Badge Scheme was also extended in 2019 to include people with 'hidden disabilities', such as people who are autistic, have a learning disability, dementia or a mental illness.

6.6 While many improvements have already been implemented to the Council's disabled parking provision, further improvements are being delivered. The E&CS Scrutiny review is therefore timely and helpful, providing the insight and steer required at a crucial time. This review validates some improvements planned and highlights other improvements that need to be brought forward.

6.7 It is helpful to know that online access and self-service options are seen as a priority by users. We are well advanced in the commissioning and roll out of a new IT system that will include a new Blue Badge Case Management System (CMS). This CMS will improve the digital offer and will address many of the concerns raised about service delivery.

6.8 The review has aided a better understanding of the impact of current multi-organisational delivery of this service. While some of those arrangements are unavoidable, improvements can be explored especially with internal Council services and options explored on how to integrate those services further reducing overlaps and duplications.

6.9 Much work has also been undertaken with the Integrated Community Therapy Team (Whittington Trust) to enable the resumption of assessments (face to face appointments) taking account of Covid 19 restrictions. Those discussions have explored how the service can be improved at a time of additional health and safety considerations. Processes are being reviewed and more importantly efforts are being made to ensure that applicants requiring an assessment to determine their eligibility for a Disabled Blue Badge and / or a dedicated Disabled Parking Bay, understand the need for an assessment as well as the process in advance of their appointment. This will not only improve the customer experience but will avoid situations where an assessment cannot be concluded due to an absence of essential information.

6.10 The response to each of the recommendations is set out in Appendix 1.

7. Contribution to strategic outcomes

7.1 The recommendations in the Disabled Blue Badges and Supporting Better Access to Parking for Disabled People Blue Badge and Disabled Bay Operational Review supports three Themes within the Borough Plan 2019-2023 – People, Place and Economy.

7.2 **People Theme:** Our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their

potential. The availability of Blue Badges and access to parking will contribute to specific Outcomes within this Theme including:

- All adults are able to live healthy and fulfilling lives, with dignity, staying active and connected in their communities e.g. easy access for those who require disabled parking services.

7.3 **Place Theme:** A place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. The review will contribute to specific Outcomes within this Theme including:

- A cleaner, accessible and attractive place e.g. better managed parking facilities, especially those that are dedicated to disabled motorists.
- e.g. improved access, including a better developed digital offer making it easier for our residents and customers to access the services they require.

7.4 **Economy Theme:** A growing economy which provides opportunities for all our residents and supports our businesses to thrive. The review will contribute to specific Outcomes within this Theme including:

- A borough where all residents have access to training and skills development opportunities and more people are supported into work e.g. improved access to disabled parking services will support disabled motorists in accessing education, training and employment.

8 Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities

a. Finance Comments

The implementation of these recommendations can be contained within existing revenue resources.

Any new bays will be funded from the existing capital programme budget for the scheme.

b. Procurement comments

Not applicable.

c. Legal comments

The proposed changes to the Council's Blue Badge Scheme in the Environment and Community Safety Scrutiny Panel's recommendations will assist people with disabilities park close to their destination to access goods and services, etc… as legislated for under Section 21 of the Chronically Sick and Disabled Persons Act 1970.

Cabinet is authorised under the Constitution to agree the Environment and Community Safety Scrutiny Panel's recommendations in Appendix 1 as such recommendations relate to one of the council's non-executive functions.

d. Equality

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 people who do not
- Foster good relations between people who share those characteristics and people who do not

The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

The recommendations put forward by the Environment and Community Safety Scrutiny Panel aim to improve access and the availability of disabled parking services, improve the process of applying for and renewing blue badges, prompt a review of all correspondence regarding blue badges between the council and disabled residents, and ensure the health assessment process for blue badges is as simple and streamlined as possible.

By accepting the recommendations within the Environment and Community Safety Scrutiny Panel's report, access to disabled parking services will be improved for disabled people, allowing them to keep and use a vehicle, giving them the freedom required to travel and access work, and all other facilities that could not be accessed without this facility.

By accepting the recommendations in this report, disabled people will also be benefited due to the implementation of a faster, more efficient process for applying and renewing blue badges. Furthermore, all correspondence between the council and disabled resident will be reviewed to ensure it is courteous, clear, and free of intimidating language, benefitting all disabled blue badge holders and their families. Disabled people will also benefit due to the recommendations regarding health assessment appointments. The recommendations will ensure increased flexibility around appointments and ensure that all delays to the process are minimised.

9 Use of Appendices

- **Appendix 1** – Scrutiny Review: Blue Badges and Supporting Better Access to Parking for Disabled People
- **Appendix 2** - Blue Badge Review Recommendations

10 Local Government (Access to Information) Act 1985

Scrutiny Review: Blue Badges and Supporting Better Access to Parking for Disabled People

A Scrutiny Review by the Environment and Community Safety Scrutiny Panel
2019/20

Panel Membership	Cllr Adam Jogee (Chair)
	Cllr Eldridge Culverwell
	Cllr Barbara Blake
	Cllr Peray Ahmet
	Cllr Julie Davies
	Cllr Julia Ogiehor
	Cllr Scott Emery
	Ian Sygrave (Co-opted member)

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CHAIR'S FOREWORD

The remit of the Environment and Community Safety Scrutiny Panel is such that the options for reviews to focus on, issues to unpick and policies to test are almost innumerable. As Chair, working with my colleagues, I wanted to ensure that we focused on issues of importance to the community, issues that affected the lives of our people and issues where we could deliver real change. That vision remains my priority and will do so every day I serve as a Councillor here in the London Borough of Haringey.

There are many responsibilities of the Council to the people who live, learn and work in our community. Among those important responsibilities to the people of Haringey is the fight to ensure that our Borough – east and west – is accessible, inclusive, safe and welcoming.

Those aims and objectives underpin why we chose to look at the issue of disabled bays and Blue Badges. The application process, used by many residents in our Borough, have long been inefficient, inaccessible and in some cases, not fit for purpose. A Cabinet level decision was made in early 2019 to review a range of parking related issues in line with the new Transport Strategy. Our panel wanted to play our part and engaged with the review in as open and reflective a way as possible. At a meeting of our panel in April 2019, we heard from members of the public, officers of the council, relevant stakeholders and many others that action was needed on disabled bays and blue badges.

Since then, we have met with and seen first hard the processes and structures in London Boroughs across our capital city. We have brought residents into the Council to share their experiences, to explain their thoughts and to work together to develop a set of recommendations that will deliver real and meaningful change. And we have met with representatives of community organisations, disability charities and other bodies relevant to this matter.

The Panel is grateful to the Cabinet Member for taking the time and effort to listen to our deliberations and work constructively with us over recent weeks and months. The progress made on dedicated disabled bays that went to Cabinet in September 2019 is the first step to delivering real change and we will continue to monitor this important area in the coming weeks and months.

The real change proposed in our review will lead to a better deal for disabled people, and those who require assistance with their mobility, so that they are able to go about their day-to-day life without obstruction or inconvenience. This is an important report that deserves to be taken seriously and we have put together a set of recommendations that I hope will receive full support from the Cabinet.

I would like to thank Philip Slawther, our Clerk, for his work and support. Those thanks are extended to all the officers here at the London Borough of Haringey who have assisted us from the start of the process to the publication of this review.

Lastly, I would like to thank my colleagues on the Panel. It has been a useful, interesting, challenging and motivating experience and I am grateful to Cllr Eldridge

Culverwell, Cllr Scott Emery, Cllr Barbara Blake, Cllr Peray Ahmet, Cllr Julie Davies, Cllr Julie Ogiehor and Ian Sygrave for their individual, and combined, contribution.

Councillor Adam Jogee
Labour Member for Hornsey
Chair, Environment and Community Safety Scrutiny Panel

RECOMMENDATIONS:

1. Cabinet to give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.

Disabled Bays and Provision of Dedicated Disabled Bays

2. That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with particular focus on the impact on the overall availability and distribution of disabled parking bays.

3. That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.

Applying for and renewing a Blue Badge

4. That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays. This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.

5. That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.

6. That Cabinet explore ways in order to make the process of applying, renewing and being assessed for a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:
    - Whether regular updates could be provided to applicants on the status of their application?
    - Whether this could be automated?
    - Ensuring that applicants can upload documents online.
    - That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?

7. That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised.

8. That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This

would also provide a partnership forum to address Blue Badge related crime as per Recommendation 11.

Enforcement and Blue Badge Related Crime.

9. That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those will genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence from Bromley that this could take as little as 30 seconds.

10. Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges. The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.

11. That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.

12. That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.

13. The Cabinet Member should engage with other Boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a pan-London level and explore the feasibility of having a more integrated system across London.

Correspondence and Communications

14. That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.

15. That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should

be launched through Haringey People and our website to “report an unused disabled bay”.

16. That the Council should send out a booklet of key information to residents as soon as they are assessed as needing a Blue Badge.

17. That the Council explore ways in which an automatic reminder could be issued, along with the existing information given to the next of kin, to cancel a Blue Badge when a death is registered.

18. A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council’s enforcement message. It is suggested that disability access representatives and the Council’s Equalities Steering Group should be involved in developing this campaign and that consideration should be given to highlighting awareness around the fact that not all disabilities are visible.

Health Assessments for Blue Badges

19. That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.

20. It is recommended that, the Council should work with Stuart Crescent Health Centre to ensure that the current 5 minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities. Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.

21. That Cabinet ensures that monitoring of the current 23 day timescale for applications to be processed is undertaken. That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.

1. Background

Introduction

1.1 The Panel were approached by the then Cabinet Member for Environment and the Interim AD for Environment and Neighbourhoods, who outlined proposals for the service to review a range of parking related issues in line with the Transport Strategy. The Parking Service were looking at updating a range of policies and operational practices as part of this. The impetus was a combination of a widening of existing Blue Badge eligibility criteria and opportunities arising from a scheduled upgrade to the Council's Civica IT system for parking, which would support additional online payment opportunities and maximise recovery of income from Parking Control Notices (PCNs). As part of this programme of work, it was felt that there were a number of opportunities for Scrutiny to be involved in a policy development role. Most Scrutiny Reviews are retrospective in nature and the Panel welcomed the opportunity to feed into an emerging policy area.

1.2 At its meeting on 30th April 2019, the Overview and Scrutiny Committee agreed to set up a review that looked into how the Council could provide better access to disabled parking services, with a particular focus on Blue Badge provision. During the Scrutiny Panel meeting on the 8th April 2019 the Panel undertook a discussion around parking services and some of the barriers faced by disabled people in accessing these services. The Panel heard from members of the public, majority and minority group Councillors and the Cabinet Member on this issue. The Panel received evidence that the process of getting a Blue Badge could be long and involve dealing a number of different agencies. This evidence reinforced some of the concerns that the Panel Members had come across through their individual surgeries and case work. Following the discussion at the April meeting of the Environment and Community Safety Panel, it was felt that there was a real need for a review of current processes and scope to make recommendations on how these could be improved.

1.3 One of the key issues that was highlighted at this stage was around the problems that some residents had experienced with getting a replacement Blue Badge in the eventuality that it was either lost or stolen. The Panel were keen to understand what could be done to speed this process up. Throughout the evidence gathering process for this review it was made clear that for many residents, having a Blue Badge, and the improved accessibility it afforded, could be life changing. The Panel were keen to hear from a range of stakeholders to better understand the problems that existed and evaluate where improvements could be made.

Scrutiny and Cabinet

1.4 Following Annual Council in May 2019, the portfolio holder for parking services changed and the Cabinet Member for Neighbourhoods became responsible for this area. The Cabinet Member for Neighbourhoods had given evidence to the Scrutiny Review and was engaged with the issue from the outset. The Panel would like to thank the Cabinet Member for Neighbourhoods for her contribution to this review, both as a backbencher and as the Cabinet Member and the level of support and enthusiasm that she has showed towards the issues raised.

1.5 Following a number of the evidence gathering sessions, the Cabinet Member made clear that she was keen to progress some of the issues that had been identified and was concerned that the scrutiny process was taking longer than she would have ideally liked. At this juncture the Cabinet Member took a decision that, rather than wait for the conclusion of the Scrutiny Review, she would seek to bring an initial phase of service improvements through the Council's Cabinet and that the recommendations of the Scrutiny Review would help inform subsequent stages of the wider operational review. The initial phase of changes to existing service provision were focused on the introduction of a dedicated disabled bay scheme and a upgrade to the Civica Parking Management IT System to underpin further improvements to the parking infrastructure in the future.

1.6 The Panel are aware that some of the proposals were time sensitive, particularly in respect of the expiry of the existing Civica contract. The Panel also recognise that this is a long-term process and that the reports that went to Cabinet in September 2019 set out the wider strategy and vision for the years ahead. The Panel understands the Cabinet Member's desire to bring about improvements and do to do so within a defined time period, but believe that the introduction of dedicated disabled bays was done without the Scrutiny Panel having completed its review of this scheme and without adequate opportunity to speak to other boroughs that had introduced similar schemes. The scheme has a cost implication to the Council and the Panel would have liked further opportunity to assure itself of the merits of introducing a dedicated a disabled bay scheme and to understand how and where this has been successful.

1.7 The Panel would like to see a close working relationship between Cabinet and Scrutiny and that both elements continue to explore opportunities to work in conjunction with one another and that there is a continued role for, and involvement in, policy development for Scrutiny.

Recommendation:
That Cabinet give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.

Aims of the Review

1.8 The Panel was mindful that that parking is a complex and wide ranging policy area. It was felt that the review was most likely to be effective if it focussed on Blue Badges as this was a vital area of parking policy for those with disabilities and could be a life line for vulnerable residents who relied on the independence and ability to undertake day-to-day tasks that it affords. The Scrutiny Review also looked into the issue of dedicated disabled parking bays and whether these should be offered to residents.

1.9 The review aimed to establish:

- What are residents' experiences of accessing and using a Blue Badge?
- How can the process of issuing Blue Badges and replacement Blue Badges be improved? What, if any, are the delays involved in the process?
- What is the current process around issuing of companion Blue Badges and the barriers involved;
- Should the Council offer designated disabled parking bays;
- How Haringey compares with other local authorities and what can be learned from their experiences;
- How could improvements be made to the written correspondence received by residents in relation to disabled parking services and Blue Badges;

Scope/Terms of Reference

1.10 The terms of reference for the review were as follows:

"To consider and make recommendations to Cabinet on what barriers exist in getting and using a Blue Badge? What are the experiences of disabled service users in accessing parking services, particularly Blue Badges and how and where improvements can be made?"

Sources of Evidence:

1.11 Sources of evidence were:

- Experience of residents and service users.
- Relevant data sources, including information on current Council processes and procedures.
- Research information.
- Performance information.
- Interviews with relevant key Council officers
- Disability access groups and voluntary sector organisations such as Disabled Motoring UK and Transport for All.[1]
- Best practice within the sector

1.12 A full list of all those who provided evidence is attached as Appendix A.

Membership

1.13 The membership of the Panel is as follows:

Councillors: Adam Jogee (Chair), Peray Ahmet, Julie Davies, Eldridge Culverwell, Barbara Blake, Scott Emery & Julia Ogiehor.
Co-opted Members: Ian Sygrave (Chair of Haringey Association of Neighbourhood Watches).

[1] Transport for All were initially keen to be involved in the process but subsequently declined our invitation to give evidence.

2. Introduction

2.1 There are around 2500 Blue Badge applications and renewals a year in Haringey and approximately 2800 disabled bays. There are around 250 applications received a year and Parking Services introduce 50 new bays and remove 20 redundant bays every 3 months. Haringey offers a Companion Badge that can be used instead of the Blue Badge and was brought in to reduce Blue Badge theft. Disabled drivers are able to park using a Blue Badge or a Companion Badge. However, the Blue Badge is valid for use across the UK, whilst the Companion Badge is only valid within Haringey. Blue Badge holders and Companion badge holders are permitted to park in all permit and shared use bays and on yellow lines for up three hours and free of charge. A Blue Badge is issued for three years before a renewal is required.

2.2 The process of applying for a Blue Badge is done through a government website. In Haringey residents can also make a paper based application through the Customer Service Centres. Haringey Customer Services also offer Digital Assistance for residents at its Customer Service Centre, which was originally set up to assist with Universal Credit applications but is being extended to all online transactions in support of the FOBO programme.

2.3 Applications for Blue Badges, either online or via a paper application, are assessed by Haringey Customer Services staff. Applicants are deemed to be eligible for automatic entitlement based on set criteria which, if met and payment is received, will result in a Blue Badge being processed on that day and the DfT usually issuing the badge within 7 working days. Including postage and delivery, this process can take up to 10 working days. If the applicant does not meet the automatic criteria then then their application is considered discretionary and further evidence is requested or a physical assessment of their mobility is undertaken.

2.4 The criteria for Blue Badge eligibility is set externally by the Department for Transport and is not something the Council has control over. All boroughs use this criteria for Blue Badge applications. Local authorities are, however, responsible for organising the assessment for discretionary applications, based on DfT criteria, as well as the day-to-day administration and enforcement of Blue Badge schemes.

Blue Badge eligibility as set by the DfT[2] is based on:

a) Entitlement without further assessment if at least one of the following applies (automatic entitlement):

[2] https://www.gov.uk/government/publications/blue-badge-can-i-get-one/can-i-get-a-blue-badge

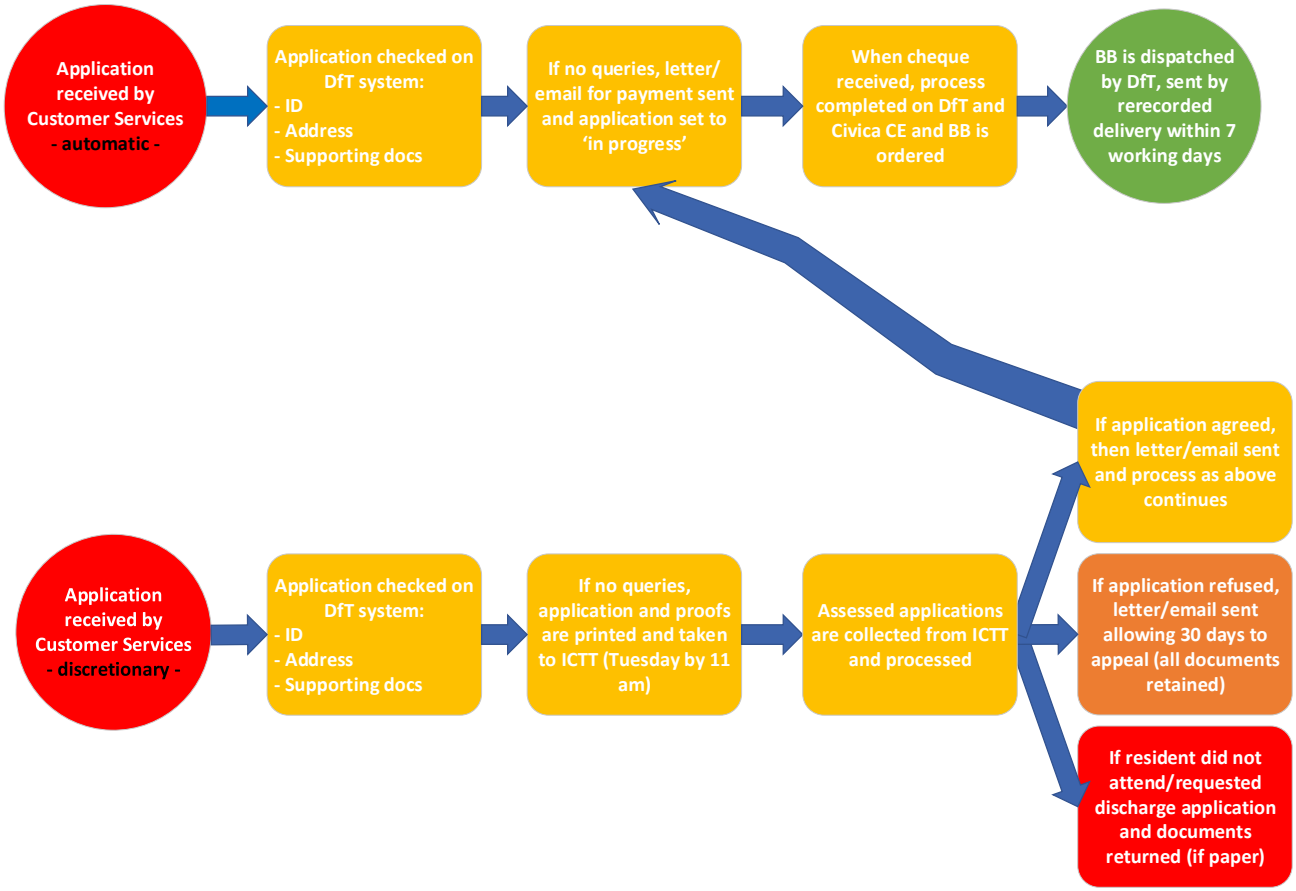
- In receipt of the higher rate of the mobility component of the Disability Living Allowance (DLA).
- In receipt of Personal Independence Payment (PIP) because you can't walk more than 50 metres (a score of 8 points or more under the 'moving around' activity of the mobility component).
- Registered blind (severely sight impaired).
- In receipt of a War Pensioner's Mobility Supplement.
- Receives a lump sum benefit within tariff levels 1-8 of the Armed Forces and Reserve Forces (Compensation) Scheme and have been certified as having a permanent and substantial disability which causes inability to walk or very considerable difficulty in walking.
- In receipt of the mobility component of PIP and have obtained 10 points specifically for descriptor E under the 'planning and following journeys' activity, on the grounds that you are unable to undertake any journey because it would cause you overwhelming psychological distress.

Or

b) Entitlement subject to further assessment. This is determined based on evidence and assessment. The DfT set out the following criteria:

- A person is unable to walk at all.
- A person is unable to walk without help from someone else or using mobility aids.
- A person finds walking very difficult due to pain, breathlessness or the time it takes.
- Walking is dangerous to their health and safety.
- A person has a terminal illness, which means they are unable to walk or find walking very difficult and have a DS1500 form.
- A person has a severe disability in both arms and drives regularly, but cannot operate pay-and-display parking machines.
- A person with a child under the age of 3 with a medical condition that means the child always needs to be accompanied by bulky medical equipment.
- A person with a child under the age of 3 with a medical condition that means the child must always be kept near a vehicle in case they need emergency medical treatment.
- A person struggles severely to plan or follow a journey.
- A person finds it difficult or impossible to control their actions and lack awareness of the impact they could have on others.
- A person regularly experiences intense and overwhelming responses to situations causing temporary loss of behavioral control.

2.5 Table 1. Application Process in Haringey for a Blue Badge - Automatic versus Discretionary process.*



*Discretionary assessments are carried out by Integrated Community Therapy Team (ICTT), which is part of the Whittington Trust.

Changes to the Blue Badge Scheme in June 2019

2.6 On 15th June 2019 the government released new guidance on Blue Badges which included changes to the eligibility criteria. These changes then came into force from 30th August 2019. Blue Badge eligibility criteria was extended to include hidden disabilities and includes people who are unable to walk as part of a journey without considerable psychological distress or the risk of serious harm. The expanded scheme coincided with the launch of a new task force to toughen up enforcement of the scheme and prevent misuse. To date, very little progress seems to have been made in relation to this task force.

2.7 In announcing the new guidance, the government set out that this was the biggest change to the scheme since its creation in the 1970s. The Panel received evidence from DMUK that a significant uptake in Badges was anticipated as a result of these changes. A funding pot of £1.7m was set up by the government to help councils with the expected increase in applications.

However the funding is only available in the in the first year of the programme. If the expected uptake in applications is sustained over longer period, Cabinet may need to consider additional funding to support this.

3 Dedicated Disabled Bays

Dedicated Disabled Bays

3.1 Cabinet adopted dedicated disabled bays at its meeting on 10th September 2019. All new disabled parking bays that the Council installs, at the request of residents, as of January 2020 are for the sole use of the applicant. Each bay will be marked by an identifying number, which corresponds to the user's permit. If a non-permitted Blue Badge holder uses this bay then they will be liable to receive a Penalty Charge Notice (PCN). Residents will also be able to submit an application to have their existing disabled bay converted into a dedicated bay. The Council's Disabled Parking Place Policy sets out that the Council will continue to install Disabled Parking Bays in town centres and other places of interest that can be used by any holder of a Blue Badge.[3]

3.2 The Panel received significant evidence from a range of contributors as to the importance that access to parking can make to people with disabilities in allowing them to park near their home or place of work. Access to disabled parking ensures that residents with disabilities are able to use their vehicle to undertake a range of day-to-day activities. Conversely, without access to parking many residents are fearful of going out and using their vehicle for fear that they will be unable to park upon their return. For those with significantly reduced mobility and a diminished capacity to walk even short distances unaided, this is a source of significant anxiety. The importance of a Blue Badge and access to parking on the health and wellbeing of users should not be underestimated and a number of those who gave evidence to panel characterised it as an essential part of their lives.

3.3 The evidence we received from Disability Motoring UK set out very clearly that one of the main concerns for disabled motorists was around a lack of enforcement and lack of available parking. The vast majority of Blue Badge holders respect the scheme and use their badges appropriately. However, with the introduction of more lenient eligibility criteria for Blue Badges by the DfT in August 2019, it is anticipated that the demand on existing disabled bays would increase significantly. This additional pressure is likely to be exacerbated in London by sustained population growth. The Panel also received evidence that when marking out disabled bays authorities needed to be mindful of the additional room required by vehicles with a disability ramp and that the of placing more than two bays in a line should be avoided for this reason.

3.4 Overall, the Panel broadly welcomes the introduction of dedicated disabled bays and is cognisant of the impact these may have on the quality of life for an individual Blue Badge user. However, the Panel is also concerned that the ongoing conversion of disabled bays to be used by a specific person at a specific location will have a significant effect on the overall availability of disabled bays across the borough. Given the increasing demand pressures expected on disabled bays and parking spaces in general, the Panel is concerned that the move to dedicated disabled bays will place additional strain on a limited resource. A Blue Badge

[3] https://www.haringey.gov.uk/sites/haringeygovuk/files/disabled-parking-place-policy.pdf

holder may be able to park their car outside their residence but they will also need available parking at the other end of their journey. The Panel notes the adoption of an 'Opt-in' approach, partly in response to similar concerns, but feels that most users will seek to utilise this service once it becomes widely known.

Recommendation:
That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with a particular focus on its impact on the overall availability and distribution of disabled parking bays.

Appeals Process

3.5 The Panel welcomes the adoption of an appeals process for rejected disabled bays and some of the evidence it received during this Scrutiny Review related to the lack of an appeals process and a perception that the process could feel arbitrary. There was also a general lack of understanding from residents on the rules and criteria behind disabled bays and why, if you had a Blue Badge, you we're automatically entitled to a disabled bay. The Panel noted concerns about a lack of joined-up thinking on Blue Badges and disabled bays. There was a feeling among some of the contributors to this review that the process for applying for a disabled bay should be made easier, given the amount of evidence required when applying for a Blue Badge.

Disabled Bay Eligibility Criteria

3.6 Eligibility criteria for disabled bays is set by the Council but is based on the automatic entitlement for a Blue Badge set out in Paragraph 2.3 of this report. The Panel is broadly supportive of the Cabinet's decision to introduce an assessment process for those who do not qualify automatically, in as much as it is felt that criteria for automatic entitlement is not a suitable determinant on its own. The Panel is keenly aware of the fact that mobility should be a determining factor when it comes to eligibility for a disabled bay however, it is concerned by the fact that this is largely determined on receipt of enhanced rate disability benefits. The Panel are concerned that many people who require a disabled bay will not be in receipt of benefits and are also concerned about the age restriction for eligibility for PIP and the potential disadvantage that causes to those over the state pension age.

3.7 It is not felt that that the introduction of an assessment process similar to the one used for Blue Badges adequately addresses these concerns. Particularly as going through an assessment process will create additional delays to the application process as well as the additional time and resource pressures on already stretched services. The Panel feel that that the eligibility criteria should be amended so as not to be based on the extent to which a person receives benefits. Significant concerns exist about the government's handling of benefit entitlement and the inherent unfairness of this system. The Panel does not feel sufficiently assured that the current arrangements provide the necessary safeguards to protect disabled residents who are not in receipt of benefits.

Recommendation:
That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.

4 Applying for and renewing a Blue Badge

Process/Online Applications

4.1 When a resident contacts the Council about a Blue Badge the applicant is signposted to a government website in order to fill out an online application. The specific section of the gov.uk website that relates to Blue Badges is run by Northgate, an external supplier that the DfT have commissioned to manage this. In order to undertake the application process the following information is required:

- A recent digital photo showing their head and shoulders.
- A photo or scanned copy their:
    - Proof of identity (such as a birth certificate, passport or driving licence).
    - Proof of address (such as a Council Tax bill or government letter).
    - Proof of benefits (if you get any).
- The applicant also needs to provide:
    - National Insurance number.
    - Details of their current Blue Badge (if they're reapplying for a Blue Badge).

4.2 The Panel were pleased to hear from officers that residents could still make a paper application and that digital support in undertaking the online application was offered to residents at Customer Service Centres. The Panel felt strongly that paper applications need to be retained for those without access to IT or those without the requisite knowledge and skills to undertake an online application process and welcomed the assurances they received to that effect. The Panel broadly endorses a digital default approach and recognises that this is part of a wider reshaping of Customer Services through the FOBO programme, provided that this comes with the continued safeguard of paper copies being available as well.

4.3 The Council are responsible for the administration process of assessing eligibility and processing the application. As part of the online application process, applicants are requested to pay a £10 administration fee which goes to the Council to cover the cost of Customer Services staff processing and administering the Blue Badge. The £10 administration fee is the maximum allowed in England as set out in statute and the Panel received evidence that it was debatable whether £10 was sufficient to meet all of the costs of administering the badge.

4.4 The Panel were surprised to hear that the £10 administration fee for the application could only be done via cheque, which was made payable to the Council. It was felt that cheques were becoming increasingly obsolete and that this was entirely out of sync with having an online application process. A number of Panel Members remarked that they were unsure whether they even owned a cheque book. The Panel also received evidence that the use of cheques to make the payments caused significant delays to the process.

4.5 The online system used for processing applications was commissioned by the DfT and the fact that applicants can't make online payments in support of their applications may be largely outside of the Council's control. The Panel heard evidence that the Council had previously used its own system for Blue Badge applications and that this had included the facility to make online payments. The decision to migrate to the DfT system was taken on the basis of greater functionality. Incidentally, the Panel was advised that, apart from the lack of online payments, the DfT system was a significant upgrade on the previous system and was much easier to use.

4.6 As part of the upgrade to Civica it is anticipated that there will be significant opportunity to improve the Council's service offer and make it more user-friendly. The Panel welcomes plans to improve systems to avoid duplication and allow IT systems to 'talk' to one another. It is hoped that this will reduce the number of times residents are asked to supply the same information to the Council and reduce costs. It is anticipated that this will make processing new badges and renewals quicker and much easier for residents. However, a fundamental part of this is developing online payments for Blue Badges. The Panel was advised that if the online application process took online payments, application that met the automatic criteria would take approximately 10 minutes to process and then 7 working days for the DfT to issue the badge.

Recommendation:

That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays.

This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.

Improvements

4.7 The Panel would like to see a process whereby Blue Badge applicants received regular updates on the status of their application and that this could be automated, so as to minimise the impact on staff resources. The application for a Blue Badge can take up to six weeks and it is anticipated that generating automatic updates on the status of applications would close the feedback loop to residents and also reduce pressure on the Council's Customer Services.

4.8 One of the recurring themes from the evidence that the Panel received was around a lack of joined up services when it came to applying for a Blue Badge. The fact that the process involves both Customer Services and the Concessionary Travel team within the Council, which in itself can involve multiple phone calls, emails and even visits to the Customer Service Centre, as well as dealing with a DfT managed IT system and NHS primary care services is identified as a source of significant frustration for service users. The fact that the process involves dealing with multiple agencies leads to delays and applicants having to relay the same

information several times. It also increases the likelihood of documents being lost in the system. The Panel feels that there is significant scope to improve joined-up working in this area and that in an ideal world this would all be managed by one agency.

4.9 The Panel received evidence that a number of residents had experienced a situation where a Blue Badge holder had reported their badge stolen and had applied for a replacement but had still received a PCN from a Civil Enforcement Officer (CEO). Residents also reported significant problems when it came to uploading documents as part of the online application process. Uploading photos was often straightforward, but attempts to upload documentary evidence were often unsuccessful. This could require phone calls to more than one department or agency to resolve. The applicant is usually directed to send the missing information to the local authority by post or in person. A further example of the disjointed nature of the process is the fact that the Haringey website states that the process takes up to six weeks whilst the gov.uk websites advised that this can take up to 12 weeks.

4.10 The Panel heard evidence from Brian Leveson, who is a local resident and the parent of a severely disabled child. Mr Leveson emphasised the importance to the quality of life for his family that the Blue Badge provided, as well as the fragmented nature of applying for the badge and a perception that each service/agency worked in silo. Mr Leveson set out that delays to the application process had a significant effect on his family, especially in the context of needing to attend regular hospital appointments. Mr Leveson was registered for Council Tax and with the SEND transport service, whilst his son was enrolled in a local school. Despite the authority holding all of the relevant information, Mr Leveson was still required to provide the information again when renewing the Blue Badge.

4.11 The Panel feels that the Council should be doing everything it can to remove obstacles for Blue Badge users but it was concerned that sometimes it seemed as though the Council was actually putting additional obstacles in the way. One example relayed to the Panel was of a resident having to attend the Customer Service Centre to deal with the a Blue Badge application in person only to be sent away as they did not have the full DLA letter from the DWP, despite the fact that it was only the first page that contained the relevant information.

4.12 The Panel heard evidence from Mr Leveson that in comparison to applying for other services, applying for a Blue Badge could be frustrating but that this was partly due to only having to do it every three years, so exposure to the process was limited. It also meant that the process could have changed since the last application. The Panel was advised that one of the main sources of frustration was not being able to speak to the concessionary travel team directly and having to go through Customer Services instead, as this caused delays and generated multiple contacts with the Council unnecessarily. The Panel feels that there should be some provision to speak to the Concessionary Travel team directly, given the vulnerable nature of some of the applicants for Blue Badges and the impact delays can have.

Recommendation:
That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.

4.13 *Badge Renewal*

The process for renewing a Blue Badge is largely the same as applying for the first time and the Panel notes that it is not necessary to resend the old badge away when applying for a replacement. During evidence gathering, a number of residents raised the issue of a lack of a reminder letter that a Blue Badge was due for renewal. The Panel heard evidence that there had not been a conscious decision to stop sending out reminder letters to residents. However, unlike the previous Bevis system, the system used by the DfT simply did not have the functionality to send out reminder letters automatically at present. The Panel were advised that the DfT system was still in development and had effectively been a beta site for some time. It was anticipated that the facility to generate reminder letters should be forthcoming. The Panel would like to see automatic reminder emails and letters sent out to Blue Badge holders.

Replacement Blue Badges

4.14 The Panel welcomed the fact that there was a specific process in place for reissuing Blue Badges that had been stolen. Badge holders were required to report the theft to the Police and provide a crime reference number. The badge would normally take 7 working days to issue. A number of people who spoke to the Panel as part of this review complained about the length of time that renewals and replacement Blue Badges took. The Panel advocates that the Council should look at ways to speed up the process and explore how lost or stolen Blue Badges could be turned around more quickly. The Panel hopes that the upgrade of the Parking Management IT system may facilitate this.

Recommendation:
That Cabinet explore ways in order to make the process of applying, renewing and being assessed for, a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:

- **Whether updates could be provided to applicants on the status of their application?**
- **Whether this could be automated?**
- **Ensuring that applicants can upload documents online.**
- **That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?**

4.15 Throughout the evidence gathering process, it was made clear to the Panel that one of the main concerns from Blue Badge users was around delays and the inherent difficulties involved in having to deal with more than one agency. It was also evident that the Council was the agency that bore the brunt of complaints and was largely held responsible when delays occurred. However, Customer Services process the vast majority of applications on the day they are received. In light of the perception and the fact that the authority has some leverage to try and improve the process, the Panel feel that the Council should take more of a hands-on approach to monitoring the overall journey of applications and ensure that there is a more integrated approach taken by all parties. It is felt that the Council is perhaps best placed to take a leading role on breaking down operational silos.

4.16 It is suggested that the Cabinet Member should undertake a piece of work to see what could be done around minimising delays and ensuring that the Council monitors the application process from start to finish. It is felt that bringing responsibility for the whole process under one person will facilitate improvements through a more robust monitoring process. The Panel would like to see the Cabinet Member receive regular performance monitoring updates as part of their portfolio. This will provide relevant data on where delays occur and allow us to better understand where further improvements could be made. Some of the data already exists such as that presented to the Panel by Customer Services. However, there are a number of stages in the process where performance is not collected. As an example, the Panel heard that Stuart Crescent did not collect data on missed appointments for the assessments visits. Missed appointments usually resulted in the application being sent back to the Council and delays occurring as a result.

Recommendation:
That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised.

4.17 It is felt that there is a gap at the partnership level around monitoring this issue and that it would benefit from the development of a more co-ordinated multi-agency response. As well as the Cabinet Member looking at how they can take a greater role in monitoring the process as a whole, it is evident that the Council can't resolve this issue on its own and needs to work with partners to improve outcomes for service users. To that end, the Panel would like to see the Cabinet Member meet with key stakeholders on a quarterly basis as part of strategic partnership forum to ensure that the overall application process is done in a way that is joined-up and made more accessible. The Council has a number of partnership forums that it uses to develop a multi-agency response and it is felt that this could build on that network. It is suggested that the forum outlined could even be established on a time-limited basis.

4.18 The forum would likely be made up of Council representatives, health colleagues, police and the DfT. This would provide an additional level of accountability as well as a dedicated body to ensure that a more integrated and considered approach is

taken. It is suggested that this would also provide an ideal forum for addressing Blue Badge related crime. The Panel feels that this is a major concern and one that requires a partnership level response.

Recommendation:
That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This would also provide a partnership forum to address Blue Badge related crime as per recommendation 11.

5 Enforcement and Blue Badge Related Crime

5.1 The Panel received a significant amount of evidence around the rise of Blue Badge related crime as well as a rise in the misuse of Blue Badges. A stolen Blue Badge could be worth a reasonable amount of money given that Blue Badge holders can often park free of charge and free from parking restrictions, such as disabled bays or yellow lines. Nationally, Blue Badge theft from vehicles has risen over 600% in the last three years. As the perceived value of a Blue Badge has increased (especially with an ever increasing pressure on London's parking infrastructure), there has been a rise in the number of fraudulent Blue Badges in circulation. The Blue Badge scheme operates across 27 different EU states (plus the UK) and their design can vary from country to country. This provides significant scope for forgery, particularly in the context of the fact that the Badges could be in one of 20 plus languages.

Enforcement

5.2 Disabled Motoring UK advised the Panel that the largest amount of complaints they received from Blue Badge holders were around a lack of enforcement of the scheme and the consequent impact on availability of parking spaces and a fear of negative perceptions towards 'genuine' Blue Badge holders. Concerns were also noted that without a proactive enforcement approach, this could lead to members of the public taking it on themselves to police the system and the inherent risks of a rise in vigilantism.

5.3 The Panel considered that Blue Badge abuse and misuse is rising due to a number of factors:

- Lack of enforcement
- Lack of understanding of the rules for the scheme (such as Badge holders allowing family members to use their badge).
- Failure to return Badges, such as when a family member passes away.
- A rise in the number of Blue Badges being used from other EU countries fraudulently.

5.4 A number of Local Authorities have undertaken various schemes for tackling Blue Badge abuse, ranging from increased enforcement patrols, encouraging the reporting of misuse, communications campaigns and improvements to technology and IT systems. During this Review the Panel visited the London Borough of Bromley to hear from officers from their shared parking service (Bromley and Bexley) about the adoption of a zero tolerance approach to Blue Badge misuse. This came about as a result of concerns from local residents and Blue Badge holders about widespread misuse of Blue Badges in the Borough and it has been up and running for around two and a half years to date.

5.5 The scheme involves providing additional training for Civil Enforcement Officers (CEOs) and encouraging them to inspect any Blue Badge they come across during the course of their duties and cross referencing the numerical information on the Badge with information held on the badge holder, such as name and D.O.B. (as

well as the person who was observed using it).The CEO would call up the back office to check with the team for possible misuse and then if anything was considered out of place an investigation would be carried out by the back office. This would usually involve telephoning the registered Blue Badge holder and asking if they were using the badge at the time. Prosecution would depend on whether officers could prove misuse, through the CEO witnessing it or through CCTV footage, for example. We received evidence that the GLC General Powers Act 1972 provides Local Authorities with the ability to request disclosure of the drivers' details and if they failed to provide those, the Local Authority is able to prosecute the registered keeper.

5.6 Bromley estimates that around 90% of misuse is carried out by family members. One of the other issues identified was around the fact that it was relatively easy to get a replacement Blue Badge and the original could then often be found again, increasing the number in circulation. A replacement Blue Badge is not marked as a replacement and it is not possible to tell just by looking at the badge. In both instances, it was only when the CEO checked with the back-office that possible misuse could be identified. Bromley also outlined a number of examples of where Blue Badge fraud was symptomatic of wider fraudulent behaviour or criminality; including cases where the investigation also led to instances of housing benefit fraud and illegal sub-letting of a property being identified.

5.7 In addition to the enforcement element, a number of communications activities were undertaken as part of the zero-tolerance approach in Bromley, including press releases of successful prosecutions and newsletters to Blue Badge holders to publicise the zero tolerance approach. Bromley also introduced a poster campaign in car parks warning drivers of the risk of prosecution and the likely fines imposed. It was reported to the Panel that, overall the scheme had been overwhelmingly successful and had a positive effect on behaviour change as well as generating the Local Authority significant amount of goodwill and positive press coverage. The scheme was overwhelmingly popular with residents and Blue Badge holders. The naming and shaming of offenders was also well received. Bromley are in the process of expanding the scheme to include an anti-idling campaign, outside local schools.

Recommendation:

That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those will genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence that this could take as little as 30 seconds.

Companion Blue Badges

5.8 Haringey currently operates a companion Blue Badge scheme which incorporates the vehicle registration number and can be used instead of the Blue Badge. The companion badge has no intrinsic value as it can only be used on the designated vehicle and is aimed at preventing theft of Blue Badges. As part of the application process for this, the resident has to be a Blue Badge holder and provide proof of address in Haringey. The vehicle registration document must be registered to that address and the Companion Badge is only valid for one vehicle. However, unlike the Blue Badge which valid throughout the UK, the Companion Badge was only valid within Haringey. Furthermore, the Panel notes that the Companion Badge is also not valid for TfL managed roads within Haringey.

5.9 The Panel is supportive of the Companion Badge scheme and welcomes attempts to tackle Blue Badge related crime. The Panel notes that the Companion Badge costs £30, as opposed to the £10 fee for a Blue Badge. Some of the contributors to the review felt that this was an inconsistency. However, on balance, the Panel is sympathetic to the fact that that the Council has to be able to cover the costs of producing and administering the badge. The Council has seen year-on-year budget cuts since 2010 and, the Council has to make difficult choices about which services it is able to subsidise.

Theft of Blue Badges

5.10 As outlined, theft of Blue Badges from motor vehicles is a growing concern for Blue Badge users. The Panel heard evidence from some residents that theirs had been stolen on multiple occasions. Aside from the obvious inconvenience of having your vehicle broken in to and the badge stolen, there were also concerns outlined above about length of time it took to get a replacement especially as the process could suffer from delays and there was no facility to track the progress of a Blue Badge application.

5.11 The Panel received evidence from Graham Day, secretary of St Ann's and Haringey joint Ward Panel on his experiences as a Blue Badge holder in the borough. Mr Day suggested that theft of Blue Badges was a recurring issue raised at Ward Panel meetings and he had suggested that based on the figures in Harringay ward, there was probably around 700 incidents a year borough wide. Mr Day advised the Panel that he had a device which attached to the steering wheel and locked the Blue Badge in place. The device cost between £30 & £40 and had prevented any further thefts of his Blue Badge taking place. The Panel considered the relative cost of theft prevention devices against the administration costs of renewing stolen badges, sometimes on multiple occasions. The Panel feels that there is a clear case for the Council looking at how it could provide these devices for Blue Badge users, perhaps on an 'invest to save' basis, given the administration costs of providing replacements. It is anticipated that the Council could be able to take advantage of being able to receive a reduced unit cost from buying in bulk. At the very least, the Council should be promoting these devices to its Blue Badge users as part of the application process.

5.12 Theft of Blue Badges and Blue Badge-related crime will require working with police colleagues and other key partners to resolve. There is ample evidence of the proliferation of this type of crime and the Panel feels that this needs to be higher up the political agenda. The Council already has a partnership body that looks into crime and community safety and it is suggested that the Community Safety Partnership could provide leadership on this issue and monitor efforts to tackle it going forwards.

Recommendation:
Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges. The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.

Recommendation:
That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.

Virtual Permits

5.13 The Panel would like to see the Council move to a position of issuing virtual permits instead of a physical Blue Badge and believe that this should be the long term aim of for Haringey. The Panel envisage that this would work in a similar way to car tax, in that all of the information is stored electronically and there is no longer any need to physically display a tax disc on a vehicle's windscreen. All of the necessary documentation is already supplied to the Council as part of the Companion Badge application process. It would simply be a case of the CEO scanning the vehicle registration into a device and an electronic database would hold all of the relevant information, including whether that person held a Blue Badge. The clear advantage of having a system of virtual permits is that there is nothing to steal and there is no risk of forgery. Consequently, it is anticipated that that this would have significant impact on the theft of Blue Badges overnight. It would also negate the need for separate Companion Badges to be issued.

5.14 Although a virtual Blue Badge permit would fulfil a similar role to the existing Companion Badge scheme, it is felt that there are a number of distinct advantages. Having a virtual permit system for Blue Badges would minimise any delays associated with processing and delivery and permits could presumably be issued instantly. Having an online database that allowed the CEO instant real-time access to whether or not that person held a valid Blue Badge would also eliminate mistakes and the risk of CEO's incorrectly issuing PCN's for failing to display a Blue Badge or Companion Badge. As has been outlined elsewhere in this report, this is an issue

especially when the holder has had their Blue Badge stolen. Virtual permits would assist with the Council's carbon reduction targets as there would be no need for a paper Companion Badge to be produced, as well as the associated reduction from not having to undertake postage and delivery. It is also expected that there would be savings available from moving to virtual permits through streamlining processes and reducing administration.

5.15 The Panel recognise that introducing a system of virtual permits is not something that can be done overnight and that this is a long term aspiration. It would take some time to develop our processes in support of this and there would likely be costs involved in upgrading the functionality of the IT systems and the hand held devices used by CEOs. It is hoped that the decision to upgrade the Parking Management IT System will provide opportunities to explore how this could be done and at what cost. Alongside virtual permits the Panel feel strongly that the Council should also retain some provision of a paper application process as there are significant equalities considerations when moving to an online application system only.

Recommendation:
That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.

5.16 The London Borough of Bromley have moved to a position of virtual permits and advised that they had achieved significant cost savings as a result. There are a number of examples of authorities that have transitioned to a similar system and the Panel would like to see the Cabinet Member engage with other boroughs that have implemented virtual permits to see what lessons could be learnt.

5.17 The Panel would also like to see virtual permits encouraged at a pan-London level and believe that the Mayor and London Councils should be engaged to promote this issue. Exploration of the feasibility of adopting a more integrated approach across London is encouraged, albeit it is recognised as a long term outcome. The Panel would like to see a situation where a virtual permit issued to a Haringey resident could be used across London. In order to achieve optimal results in tackling the theft of Blue Badges we need co-ordination at a London-wide level in order to ensure that the IT systems are joined up and that processes are integrated.

Recommendation:
The Cabinet Member should engage with other boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a Pan-London level and explore the feasibility of having a more integrated system across London.

6 Correspondence and Communication

Correspondence with Residents

6.1 The Panel received evidence around a variable quality in the letters and other forms of communication issued by the Council around Blue Badges and associated parking services. Residents were concerned about the tone of some of the communications especially in reference to where that person was required to do something or had failed to provide what was requested. It was felt that the language used could be quite intimidating and a disproportionate emphasis was placed upon the potential sanction or penalty, rather than simply providing the information requested. One example we received was around a straightforward request for information around a Blue Badge renewal, the response to which was unduly focused on highlighting the possible penalties to that person from continuing to use the badge after its expiry. The person was directed to the gov.uk website but no additional information was provided about how long the process could take or what documentation was required.

6.2 Other concerns highlighted to the Panel were around a lack of clear advice when it came to communications and concerns that letters and emails were not always set out in a way that made them easy to understand. We also received evidence of instances where the Council treated what was essential a recurring service request as a complaint. In one instance, a service user wanted to know if and when they would receive a disabled parking bay, but were instead directed through a complaints process. The resident in question also commented that, after receiving approval, they never received any contact from the Council telling them when the bay was going be installed. Frustrations from residents at automated telephone messages advising people to go online were also relayed to the Panel. It is felt that for those with severe disabilities, it is not always as easy to access online services and that some consideration should be given as to how appropriate this message is in these circumstances.

6.3 It is felt that the issues raised in relation to the quality and tone of correspondence are likely to be broader than just Blue Badges and that the issues raised as part of this review will likely have a resonance across the organisation. It is therefore suggested that a review should be undertaken of the correspondence from across the organisation that Council sends out to its residents.

Recommendation:
That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.

Reporting a Disabled Bay that is no longer in use.

6.4 The Panel heard evidence from local residents and ward councillors that removing a disabled bay that was no longer in use could be quite a long and drawn out process. Many Disabled Bays have been in place for a number of years and in many instances the original applicant may well no longer living there. Given the decision to implement Dedicated Disabled Bays and the anticipated increase in demand for disabled parking spaces, it if felt that there is an imperative to monitor and remove obsolete disabled bays as promptly as possible. The Panel understands that notice has to be given for a removal of a bay and that this can take some time. However, the panel heard anecdotal evidence of the process taking over six months in some cases.

6.5 The Panel were keen to see some communications activity undertaken on this issue to engage with residents and encourage them to report bays that were no longer in use. The Panel suggest that there could be a dedicated web page on the Council's home website where residents could 'Report an Unused Disabled Bay.' This could be supported through press releases and other communications activity.

Recommendation:
That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should be launched through Haringey People and our website to "report an unused disabled bay".

Communications Activity

6.6 In light of concerns from residents that applying for or renewing Blue Badge could be a complicated process and involve liaising with different services and agencies, the Panel would like to see the Council send out a booklet of key information to residents as soon as they are assessed as meeting either the automatic or discretionary criteria. It is anticipated that this booklet let will provide a range of information, advice and guidance on the process and the anticipated timescales involved. It would also provide an opportunity for the Council to provide information on other services such as how to apply for a Dedicated Disabled Bay.

Recommendation:
That the Council should send out a booklet of key information to residents as soon as they are assessed as being eligible for a Blue Badge.

6.7 The Panel also feel that there is scope for the Council to take a more proactive approach in issuing reminders to cancel a Blue Badge when a death is registered. The Council's Register Office is responsible for the recording of a death. This is usually undertaken by a relative and should be done within 5 days (in England).

As part of this process, a raft of information is given to the next of kin about who to contact and what to do next, including information on pensions, taxes and benefits. The Panel suggests that a reminder around cancelling Blue Badges could be easily incorporated into that process. As has been highlighted elsewhere in this report, a significant amount of misuse of Blue Badges is done by family members including continuing to use the badge after that person is deceased. Cancelling a Blue Badge is unlikely to be at the forefront of a person's mind when registering a death. Providing a gentle reminder at this juncture is felt to be appropriate and in keeping with other forms of information provided.

Recommendation:
That the Council explore ways in which an automatic reminder could be issued to cancel a Blue Badge, along with the existing information given to the next of kin when a death is registered.

6.8 Following on from Recommendation 9 in respect of adopting a more proactive enforcement approach to Blue Badges, the Panel feels that a communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. This would also provide an ideal opportunity to promote some of the other recommendations from this review such as use of anti-theft devices as well as other pertinent information in relation to parking.

6.9 During the course of this review the Panel heard from a representative of the Equalities Steering Group for Haringey staff. The representative advised that she had a non-visible disability and was reluctant to apply for a Blue Badge, due to the fact that she did not 'look' as though she had a disability. It was reported to the Panel that many staff members had encountered hostility from people who perceived that they didn't fit the stereotype of what a disabled person should be. Consequently, a number of staff in Haringey were reluctant to acknowledge their disability and didn't feel entitled to apply for a Blue Badge. The Panel also heard evidence that there were a number of cases disabilities where the symptoms and mobility levels a person has could vary significantly over a short timescale and that basing an assessment on mobility at a fixed point in time was flawed.

6.10 The Panel recommends that Cabinet seek to include disability access representatives and the Equalities Steering Group in developing a communications campaign. As part of the campaign, consideration should be given to awareness raising around disability and that staff can access advice and support in applying for a Blue Badge. The Panel suggests that one of the topics of the campaign should focus on raising awareness that not all disabilities are visible.

Recommendation:
A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. It is suggested that disability access representatives and the Council's Equalities Steering Group should be involved in developing this campaign and that consideration should be given highlighting awareness around the fact that not all disabilities are visible.

7 Assessments for Discretionary Blue Badge Applications

Discretionary Application Process

7.1 If the applicant does not meet the automatic eligibility criteria for a Blue Badge, Customer Services will refer the applicant for an assessment. In Haringey, Assessment for non-automatic or discretionary entitlement is carried out by a qualified assessor through the Integrated Community Therapy Team (ICTT), at the Whittington Trust, which is located at Stuart Crescent Health Centre. The Panel received evidence from Adeola Akano, Clinical Services Manager for ICTT that the clinic held slots on a Wednesday and Thursday to undertake the assessments, with six members of staff working on them (depending on the number of referrals received). Ultimately, it was the responsibility of the Senior Therapist to make a clinical judgement on whether someone was assessed as qualifying for a Blue Badge and this was done through reviewing the application bundle and consideration of the assessment score. The Panel were advised that the Senior Technician did not undertake the mobility assessment or have direct contact with the applicant (unless it was an appeal). The criteria used in determining eligibility for a discretionary entitlement is set out at Paragraph 2.4 of this report.

7.2 Applications for discretionary assessment are taken to Stuart Crescent once a week on a Tuesday by Customer Service staff. When the applications are dropped off, completed assessments are collected at the same time. If the application was approved, payment is requested by Customers Services in order to process the application. The Panel were advised by Customers Service that the application was processed on the day payment was received. Customer Services are not allowed to process Blue Badge applications without receiving payment and could not undertake any part of the process until they knew the applicant had been assessed as meeting the eligibility criteria. Once payment is received, the application is processed and it takes 7 working days for the DfT to issue the badge, as per applications that met the automatic eligibility criteria.

7.3 If the application is refused and the person is assessed as not meeting the criteria, Customer Services would then contact that person to advise that their application has been refused and that they have a 30 day window in which to appeal. All of the documents that have been received were retained during the 30 day window in order to support any potential appeal. During an appeal, the applicant could be asked to provide further evidence and could also be asked to repeat the mobility assessment. An appeal is undertaken by the Senior Therapist or the Team Leader at Stuart Crescent. If the appeal is unsuccessful, the application is withdrawn or applicant does not attend the assessment then the case is closed and Customer Services return all of the documents to the applicant.

Electronic Applications and Improving the Process.

7.4 The Panel considered the fact that applications were only sent to Stuart Crescent once a week and believes that this is source of delay. Further delays are then caused by the completed assessments also being collected once a week. The Panel were advised that Customer Services did not monitor the time between dropping off and collecting applications but applicants are advised that the process can take up to 6 weeks. The application bundles that are provided to Stuart Crescent are hard copies and the first task that staff at Stuart Crescent have to undertake is to manually key in all of the information from the bundle on to a spreadsheet. The feels like quite an antiquated approach and the Panel are surprised that printed hard copies of the application and documentary evidence are still used. One way to speed up the process and reduce the level of administration is to transfer the information to Stuart Crescent electronically. It is suggested that this would also have the advantage of being able to be undertaken at any time rather than waiting until a Tuesday morning. The Panel heard evidence that the issue revolved around the old IT system used at Stuart Crescent and concerns about information security. The Panel were advised that the Whittington Trust were in discussions to develop a secure system for document transfer.

Missed Appointments

7.5 The Panel noted with some concern that the window for late arrival to the assessment appointment was five minutes. If the appointment was missed Stuart Crescent advised that they would usually allow the applicant to reschedule the appointment once, but that after this the application was sent back to the Council. The Panel are clear in their view that an alternative slot has to be provided to applicants if they are unable to attend the appointment and that the Council should ensure that this takes place. The Panel feels that having an inflexible approach will contribute to further delays and that this should be reconsidered. The Panel received evidence from residents that a five minute was a very narrow threshold, particularly for people with limited mobility. Furthermore, this is exacerbated by a lack of parking facilities, including disabled bays, at the site and the fact that it is a walk to the nearest bus stop which involves crossing a very busy road.

7.6 The Panel received slightly conflicting evidence from Stuart Crescent as to the flexibility with which staff enforce the five minute window for late appointments. The Panel were initially informed that this was a necessity and that applicants were clearly advised that they could not be late and should arrive early for appointments. After some follow up questions, Ms Akano indicated that there was some degree of flexibility in this. However the experiences of residents that we heard from suggested that this contributed to delays and provided an added level of stress and anxiety for those attending the clinic. The Panel were interested to know what percentage of people had their appointments rescheduled and applications returned due to being late, but were advised that this information was not collected. The Panel feel that this is something that the Cabinet Member for Neighbourhoods may want to follow up on.

7.7 The Panel is sympathetic to the pressures that NHS services are under and the fact that delayed appointments have a knock-on effect, but emphasise the need

for common sense to be used. Especially in light the fact that a number of applicants that attend the assessments will have severe disabilities. The Panel would also like to highlight the fact that people attending GP appointments are afforded a 10 minute window. Overall, the Panel believes that there is scope for the Council to work with the ICTT team to improve the service and make it more responsive to residents' needs. It is suggested that the Cabinet Member having greater oversight of this process could be a key driver.

Recommendation:
That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.

Recommendation:
It is recommended that, the Council should work with Stuart Crescent Health Centre to ensure that the current 5 minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities.

The Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed.

Location of Assessment Site

7.8 The Panel raised concerns about the accessibility of the current site at Stuart Crescent given the limited parking available and considered whether alternative sites could be sought. In response, we were advised that there is an alternative site used at Gordon Road and that appointments alternated between Stuart Crescent and the Gordon Road site on a weekly basis. Residents are able to request the Gordon Road site that has more parking available, however this is not advertised and residents would have to call up the clinic to reschedule to then be offered a later appointment at Gordon Road. The Panel notes that the initial letter sent to applicants only refers to the Stuart Crescent site. It is felt that the fact there is a second location to undergo an assessment from could be better communicated to residents and that residents should be given more of a choice between the two.

7.9 The Panel would also like to see additional sites sourced across the borough, particularly as both current sites are fairly central and east-west transport links can be slow. It is suggested that commissioning more than one provider to undertake assessments would also provide an additional level of flexibility. Residents should be able to have a choice of location for their assessment. The panel would like to see a site in Tottenham as well as in the west of the borough. The Panel were advised by management at Stuart Crescent that there is not enough capacity at the Hornsey site at present to undertake assessments.

7.10 The Panel were advised that Customers Services were commissioned by Parking Services to undertake processing and administration of Blue Badge applications and that Parking also commissioned the Integrated Community Therapy Team to provide discretionary assessments at Stuart Crescent. The current 23 day time scale to undertake assessments was agreed when the contract was last commissioned. This contract was commissioned in 2009/10 and the Panel feel that this should be looked at and consideration be given to recommissioning it given the timescales involved and the fact that increased demand for Blue Badges is anticipated following the recent changes to the eligibility criteria.

Recommendation:

That Cabinet ensures that monitoring of the current 23 day timescale for applications to be processed is undertaken.

That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The Council should explore ways of ensuring that that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.

Appendix A

Participants in the Review:

Adeola Akano, Integrated Community Therapy Team Clinical Service Manager from Stuart Crescent Health Centre

Gossica Anichebe, Interim Policy and Programme Manager – LB Hackney

Sofia Bouceddour, Transport Planner – LB Camden

Laura Berryman

Cllr Zena Brabazon

Andy Briggs, AD for Customer Services and Libraries

Cllr Dana Carlin

Cllr Seema Chandwani, Cabinet Member for Neighbourhoods

Cllr Pippa Connor

Ann Cunningham, Head of Operations

Graham Day, Secretary of the St Ann and Harringay joint Ward Panel

Fred Fernandes, Parking Operations Manager

Graham Footer, Chief Executive – Disabled Motoring UK

Cllr Kirsten Hearn, Cabinet Member for Climate Change and Sustainability

Dawn Hunter, Concessionary Travel Manager

Brian Leveson

Carly Norris, Project Manager – LB Hackney

Elaine Prado, Head of Business Change, Customer Services.

Shereen Tennant, Haringey Equalities Steering Group

Chloe Wenbourne, Interim Head of Service - Shared Parking Service (Bromley and Bexley)

David Wray, Blue Badge and Fraud Enforcement Officer - Shared Parking Service (Bromley and Bexley)

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Number	Recommendation	Cabinet Response
1.	Cabinet to give consideration as to how future Scrutiny Reviews could be best supported and common timelines agreed that allow Scrutiny to carry out its investigative work fully.	Agreed.
2.	<u>Disabled Bays and Provision of Dedicated Disabled Bays</u> That Cabinet undertake to monitor the implementation and conversion of dedicated disabled bays going forward, with particular focus on the impact on the overall availability and distribution of disabled parking bays.	**Agreed.** The Cabinet agreed a series of recommendations arising from the Operational Review of Disabled Blue Badges and Disabled parking Bays in September 2019. This included the introduction of dedicated disabled parking bays, an additional eligibility criterion that allows qualification subject to further assessment and an appeals process for applicants who application has been unsuccessful. Demand for dedicated disabled parking bays will be continually monitored to ensure an adequate and proportionate disabled parking provision borough wide. It may also be helpful to note that the Disabled Blue Badges offers concessions in Haringey beyond the national scheme and can be used for unlimited time in residential, shared use and paybyphone parking bays, as well as for three hours on single yellow lines.
3.	That Cabinet reconsider the eligibility criteria for disabled bays and the use of automatic entitlement based upon whether the person is in receipt of higher rate/enhanced rate benefit payments.	**Agreed.** The eligibility criteria for dedicated disabled parking bays has been extended to include an entitlement subject to further assessment. This brings the assessment process for dedicated disabled parking bays more in line with the National Disabled Blue Badge scheme. Applicants with severe mobility restrictions may be assessed by Experts Assessors to determine eligibility. Those

		assessments are undertaken by the Expert Assessors who deal with Disabled Blue Badge assessments and are structured in a manner that covers eligibility for both services if required. This reduces bureaucracy and the need to multiple assessments for those services.
4.	<u>Applying for and renewing a Blue Badge</u> That Cabinet undertake to explore ways of ensuring that online payments can be made for Blue Badges. At present the £10 administration fee can only be paid via cheque which causes unnecessary delays. This may require engaging with the DfT and seeking changes to the government website. It is suggested that Local Members of Parliament could be engaged on this issue and their influence sought.	**Agreed.** It is recognised that the Department for Transport (DFT) Disabled Blue Badge system while adequate in handling applications, does not support modern service delivery. As part of the Parking Transformation Programme, a new parking Management IT system has been commissioned and is expected to be implemented by the end of this calendar year. The service has taken the opportunity to include the development of a new Disabled Blue Badge Case Management System (CMS) as part of that procurement. This new system will allow online access as well as online payments.
5.	That provision be put in place for Blue Badge applicants to be able to speak to the Concessionary Travel team directly.	**Agreed.** This arrangement in now in place and the telephony system allows applicants direct access to the officers dealing with their applications.
6.	That Cabinet explore ways in order to make the process of applying, renewing and being assessed for a Blue Badge more streamlined and less disjointed. Specifically, the Panel would like Cabinet to consider:	**Agreed**. Currently there are two ways of applying, renewing or replacing a Blue Badge. The Blue Badge Application Service is an electronic application service commissioned by the Department for Transport (DfT) and

7.	• Whether regular updates could be provided to applicants on the status of their application? • Whether this could be automated? • Ensuring that applicants can upload documents online. • That provision of an automatic renewal reminder email/letter to Blue Badge holders at the appropriate point, be explored?	hosted through the gov.uk platform. This service allows applicants to renew or request a replacement badge or submit a new application. This service was implemented in January 2018 and is intended for use by all Local Authority (LA's) in England & Wales. Haringey also retained the paper-based application process. The new Haringey Blue Badge CMS will allow applicants to renew , request replacement badges or submit a new application through the Haringey website. The CMS will allow a status update to be sent to applicants by email. The new CMS will provide an enhanced service , including reminder letters, as well as a link to prompt online payment by credit or debit card once the application is accepted. This will make the process less disjoined and more streamlined. Blue Badge applicants currently have the option of uploading the supporting evidence requested via the DfT Managed Blue Badge Service on the Gov.Uk platform and will also have this option when the Blue Badge CMS is implemented. Work is also underway to provide direct access to Department for Works and Pensions (DWP) data to assist with the administration of the Disabled Blue Badge scheme. This is being led by the Local Government Data Sharing Transformation team. It is the intention to share this information through Searchlight which most Local Authorities already use. While due to associated sensitivities , access to this data will not be rolled out to all Customer Service staff. We do have nominated staff within the parking client service can access the data. In practice this will mean that applicants receiving Personal Independence Payment (PIP) and Disability Living Allowance (DLA) who are likely to have an automatic entitlement to either a

		Disabled Blue Badge, or a dedicated disabled parking bay will not have to supply any documentation.
8	That the Cabinet Member should have a greater oversight of the overall process from start to finish. The Cabinet Member should receive regular performance monitoring updates from the different areas and an action plan should be developed to improve monitoring and ensure delays are minimised. That the Cabinet Member undertake to arrange a quarterly strategic partnership forum with key stakeholders, including the Council, the Whittington, Police and DfT to ensure that the overall journey is streamlined and made more accessible. This would also provide a partnership level forum to address Blue Badge related crime as per Recommendation 11.	**Agreed.** The service monitors the overall performance of this service and arrangements will be reviewed to also measures each component part of the process. This will help identify weaknesses or failures at any part of the process. This information can be shared with the Cabinet Member as well as any measures being undertaken to rectify underperformance. **Agreed.** The role that this strategic partnership could play is recognised. Discussions are underway with partner organisations to understand the viability of establishing this forum.
9.	<u>Enforcement and Blue Badge related crime</u> That the Council should prioritise tougher enforcement of Blue Badge fraud in order to ensure that those will genuine mobility issues are able to use their vehicles. Training should be provided for Enforcement officers and processes put in place so that any Blue Badge identified by a CEO was inspected and the badge holders' details cross referenced with the back office for possible misuse. The Panel heard evidence from Bromley that this could take as little as 30 seconds.	**Agreed** The service has undertaken enforcement of the fraudulent use of disabled Blue Badges for a number of years. Those operations are led by service experts supported where necessary by Police and Civil Enforcement Officers (CEOs). Those operations involve proactive onsite investigation of Blue Badge usage, as well as the investigation of irregularities reported by CEOs and residents. Further training can be provided to CEOs who already play a role in identifying potential abuse. The functionality of the new IT system will allow validation of Blue Badges using the handheld software, which will link into the national database. We are mindful that all disabilities are not visible, and we therefore seek

		to adopt an appropriate degree of sensitivity in handling such matters. While identification of the abuse can be done by CEOs, dedicated resources are required in the back office to deal with all follow up actions which can be quite complex. The new operational model being designed and delivered as part of the parking transformation programme will increase capacity across the service and will support increased enforcement in this area.
10.	Consideration should be given to how the Council, working with police and partners, could support the rollout of theft prevention devices for Blue Badges.	**Agreed**. The service can raise awareness of the availability of theft prevention devices and how they may be purchased, as part of an overall campaign to raise awareness of the scheme, as well as reducing abuse and its associated crime. The new free virtual residential parking permit being issued to Blue Badge Holders will also help reduce theft of badges.
11.	The Panel received evidence that these were particularly effective and cost between £30 & £40. Cabinet should consider whether providing these was cheaper than the administration costs associated with replacing a stolen Blue Badge.	**Not agreed.** An analysis of costs has been undertaken. The cost to the Council in providing theft reduction devices would exceed current service costs. Current funding limitations need to be considered, as well as the fact the Disabled Blue Badge service is not a means tested service. As a consequence many badge holders will have the resources required to purchase those devices if required.
12.	That the Council works closely with the police to reduce proliferation of Blue Badge related crime. The	**Not agreed.**

	Panel received evidence that Blue Badge theft from vehicles has risen over 600% in the last three years. It is suggested that the Community Safety Partnership could examine this issue as part of its work programme for 2020/21.	The Council already works with the police on misuse of Disabled Blue Badges and this is done in the context of many priorities. Investigating Blue Badge theft does not connect with the terms of reference of the Community Safety Partnership as their role is mainly strategic. However, the establishment of the quarterly strategic partnership forum that will include police representatives would also serve to ensure that the impact of blue badge related of crime is continually raised.
13.	That the Council explores the feasibility of issuing virtual permits instead of Companion Badges. Cabinet should also ensure that provision of paper applications is retained on some level in order to ensure residents without access to IT are not unduly disadvantaged.	**Agreed.** The decisions arising from the recent review of parking fees and charges included replacing the companion badge with a free virtual residential parking permit for the applicant's home CPZ. Many Local Authorities who previously offered companion badges have already replaced them with a residential parking permit. The Council will move to virtual parking permits, once the new IT system goes live later this year. Paper-based applications will be retained for this who cannot use online services.
	The Cabinet Member should engage with other Boroughs that have implemented virtual permits to see what lessons can be learnt. Engagement should also be sought with the Mayor's Office and London Councils to encourage adoption at a pan-London level and explore the feasibility of having a more integrated system across London.	**Agreed.** The Council is represented at London Councils Transport Executive Committee (TEC). TEC also provides the opportunity to seek consistency in transport issues. Haringey offers concessions beyond the National Scheme and beyond that offered by many other boroughs and as such those boroughs may also benefit from Haringey's experience.

		The parking service also collaborates and shares experience with other boroughs and this is reflected in the approach to delivery of the new parking IT system. In particular, the arrangements supporting the new permit offer has been designed taking account of experience of other boroughs who have already gone live with virtual permits.
	<u>Correspondence and Communication</u>	
14	That a commitment is given that the Council will carry out a review of the letters and communications that it sends to residents to ensure that they are clear, courteous and without the use of intimidating language.	**Agreed.** The all communications are being reviewed to ensure that they are clear concise and courteous.
15.	That the Council implement provision for residents to report disabled bays that were no longer in use and that processes are put in place for adequate monitoring of disabled bays and whether they were being used. Once a bay is identified as being unused there should be a clear timeline for its removal. A campaign should be launched through Haringey People and our website to 'report an unused disabled bay'.	**Agreed.** This can support efforts in monitoring the wider disabled parking bay provision across the borough. There would not necessarily be a need to remove a disabled parking bay unless there are pressures on kerb space that particular area.
	That the Council should send out a booklet of key information to residents as soon as they are assessed as needing a Blue Badge.	**Agreed**. The National Disabled Blue Badge information booklet is provided to each new applicant to ensure a comprehensive understanding of the scheme. Local concessions will be also be set out in the letter agreed qualification for the scheme.

16.	That the Council explore ways in which an automatic reminder could be issued, along with the existing information given to the next of kin, to cancel a Blue Badge when a death is registered.	**Partly agreed.** The Council does not hold next of kin data on Disabled Blue Badge Holders. The Council does however subscribe to the Governments 'Tell Us Once' service, which allows relatives registering a death to notify several services at that one point of contact. Those notifications are also used to cancel Disabled Blue Badges. It may also be helpful to note that the maximum number of years that badges are valid is three years.
17. 18.	A communications campaign should be implemented across the Blue Badge agenda which clearly sets out the Council's enforcement message. It is suggested that disability access representatives and the Council's Equalities Steering Group should be involved in developing this campaign and that consideration should be given to highlighting awareness around the fact that not all disabilities are visible.	**Agreed.** A publicity campaign has commenced raising awareness of the impact and consequence of parking illegally in Disabled parking bays in Town Centres. This campaign will be extended to cover all elements of the scheme. We will also work with the DfT to promote communications at National Level regarding hidden disabilities.
19.	<u>Health Assessments for Blue Badges</u> That consideration should be given on to how to minimise delays within the assessment process, including ensuring that assessment bundles can be transferred to Stuart Crescent electronically.	**Agreed.** Boroughs have their own arrangements in place for mobility assessments by Expert Mobility Assessors. Haringey deliver this service in partnership with the Whittington Health Trust. Discussion on the electronic transfer of applications bundles is underway. It is hoped that a solution will be in place in the near future.
20.	That the Council should work with Stuart Crescent Health Centre to ensure that the	**Agreed.** The appointment letter issued by the Whittington Health Trust is designed in line with their corporate design, we are seeking to

	current 5-minute deadline for late arrivals was extended and a greater degree of flexibility afforded to applicants, given the mobility levels of the people being assessed and the lack of available parking facilities. Cabinet should work with the Whittington Trust to ensure that residents were provided with an alternative date when an appointment was missed. That Cabinet ensures that monitoring of the current 23-day timescale for applications to be processed is undertaken.	bring the letter more in line with the Haringey design. While we are informed that in practice applicants arriving slightly late are not refused an assessment, we are seeking to have this letter revised and a greater degree of flexibility introduced. **Agreed.** This is being negotiated with the Whittington Health Trust. **Agreed.** The monitoring of all component parts of the process will be monitored. The Council measures performance in this area, as well as the timelines for the full end to end application process. We currently aim to process all completed applications within 30 working days. This exceeds the new DfT guidance which allows up to 12 weeks for application handling. We are also working with the Trust to understand the delays in undertaking some assessments. There are varying factors and we are seeking solutions to all. However, we believe that ensuring a better understanding of the process by applicants, allowing them to come well prepared will improve not only improve the customer experience, but will also reduce delays in assessment by reducing the need to rearrange appointments.
21.	That Cabinet also explores recommissioning of the current contract to provide assessments for discretionary Blue Badge applications as it was last done over 10 years ago. The Panel recommends that consideration is given to commissioning additional providers for the assessment process for greater flexibility and distribution across the borough. The	A**greed in Part.** The Council delivers this service through a partnership arrangement with the Whittington Health Trust. This is not a formal tendered arrangement, but a negotiated arrangement with costs borne by the Trust.

	Council should explore ways of ensuring that that residents have a choice of which centre they attend and that there is some provision in the west of the Borough as well as in Tottenham. The Panel suggests that recommissioning this service could potentially provide an opportunity to speed up the assessment process and minimise delays.	Market research has been undertaken to understand the private sector offer. A move to the private sector at present would require significant additional investment in the service. While we understand the limitations of the market research undertaken, it is clear that while there may be some benefits and flexibilities, they would not be extensive. We therefore recommend remaining with the Whittington Health Trust. However, we acknowledge that while the Stuart Crescent and Bound Green Assessment Centres serve the west and central parts of the borough reasonably well, the east of the borough would benefit from a dedicated service. We will work with the Trust to explore opportunities for the future.

Agenda Item 10

Report for: **Cabinet, 13 October 2020**

Title: **New Haringey Local Plan – First Steps Engagement**

Report authorised by: David Joyce, Director of Housing, Regeneration and Planning

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Ward(s) affected: All

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 The Local Plan is the main Council document which:

- Planning applications are determined in accordance with (unless material considerations indicate otherwise);
- Sets out a positive spatial framework for development across the borough;
- Acts as a positive spatial expression of the Council's wider corporate strategies and policies, including the Borough Plan; and
- Enables communities to be engaged up-front in the planning process.

1.2 It is important to keep the Local Plan up-to-date so that:

- It provides a robust basis for determining planning applications;
- It continues to represent the latest Council corporate strategies, policies and aspirations; and
- Legal and policy requirements to keep Local Plans up-to-date are met.

1.3 In November 2019 Cabinet agreed an update to the Council's Local Development Scheme (LDS) setting out that a New Local Plan would be prepared by 2022 to replace the existing suite of existing Local Plan documents which were adopted in 2017. The New Local Plan is required to:

- Take account of the new National Planning Policy Framework (NPPF) (2019);
- Take account of the emerging New London Plan ;
- Reflect the Council's new Borough Plan (2019);
- Respond to the Climate Emergency declared by the Council in 2019;
- Support the borough's recovery and renewal from COVID-19; and
- Meet legal and policy requirements for the Council to have an up-to-date plan and a 5 Year Housing Land Supply.

1.4 The New Local Plan - First Steps Engagement consultation document (Appendix A) is the first step in preparing the New Local Plan and provides the opportunity for residents, businesses and other local stakeholders to shape the

New Local Plan from the beginning, identifying key issues and challenges the borough faces and preferences for various possible options. It is intended to begin a conversation about the direction of New Local Plan and as such it does not contain draft policies. Consultation on the document will be wide-ranging and far-reaching and is supported by a comprehensive Communications and Engagement Plan (Appendix C).

1.5 Alongside the New Local Plan – First Steps Engagement consultation document an Integrated Impact Assessment (IIA) Scoping Report has also been prepared for consultation (Appendix B). At each stage of the New Local Plan an IIA will be prepared to ensure that sustainability, habitats, health and equalities impacts are fully considered, as required by legislation, policy and guidance. The IIA Scoping Report forms the initial stage of the IIA process and consists of a collection of baseline data and information on other plans, policies and programmes that can have an influence on the production of the New Local Plan. The Scoping Report establishes the context and determines the scope of the subsequent IIA report to be published alongside later draft versions of the New Local Plan.

2 Cabinet Member Introduction

2.1 Our existing Local Plan was adopted over three years ago. Since then, the Council has published a new Borough Plan, driven by the administration's manifesto commitments to reducing inequality. In 2019, Haringey Council declared a Climate Emergency.

2.2 We need a new Local Plan to provide a robust and fit-for-purpose planning framework for the borough. It is the framework by which we will make planning decisions for the long-term future of our borough. We need to deliver on the Borough Plan's commitment to genuinely affordable housing for Haringey residents. We need to hard-wire sustainability into planning decisions to achieve our ambitious target of carbon neutrality by 2041. We need to deliver community-led growth for our residents and businesses, and reflect the New London Plan as we do so. The new Local Plan will help us achieve these things.

2.3 All of this must be done in the light of the COVID-19 pandemic. The New Local Plan will help us make a broad and lasting recovery.

2.4 This First Steps document allows us to engage and consult with residents, businesses and other stakeholders from the very beginning, so that this Local Plan will be shaped at every stage by the people it serves.

3 Recommendations

3.1 That Cabinet:

1) Approves for public consultation, in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012, the New Haringey Local Plan: First Steps Engagement consultation document (Appendix A);

2) Delegates authority to the Interim Assistant Director of Planning, Building Standards and Sustainability to agree the final version of the New Haringey Local Plan: First Steps Engagement consultation document, and other supporting material to be produced for consultation purposes including the Integrated Impact Assessment (IIA) Scoping Report, in consultation with the Cabinet Member for Planning and Corporate Services to the extent that any changes to the versions approved by Cabinet are non-material (examples of changes permitted shall include minor text, layout and design changes as well as changes needed for clarification and for consultation purposes).

4 Reasons for decision

4.1 A new Local Plan is required to provide a robust planning framework for the future planning of the borough that takes account of the new National Planning Policy Framework and the emerging New London Plan, reflects the new Borough Plan (2019), responds to the Climate Emergency, supports the borough's recovery from COVID-19 and meets legal and policy requirements for the Council to have an up-to-date plan and a 5 Year Housing Land Supply. The New Local Plan – First Steps consultation document will provide the opportunity for residents, businesses and other local stakeholders to shape the New Local New Plan from the beginning, identifying key issues and challenges the borough faces and preferences for various possible options.

5 Alternative options considered

5.1 The alternative options considered are:

- Option 1: Do not prepare a New Local Plan at this time. The Council could continue using the existing Local Plan and the London Plan to support planning decisions. The advantage of this option is that it would not require any immediate resources. The disadvantage is that the Council would not have a fully up-to-date plan which reflects the new National Planning Policy Framework and new London Plan, responds to the corporate priorities in the Borough Plan and provides specific support for COVID-19 recovery and renewal.
- Option 2: Prepare a New Local Plan but do not carry out a First Steps Engagement consultation. The advantage of this option is that it would shorten the process of preparing a New Local Plan and reduce the resources required to do it. The disadvantage is that the Council would not be engaging the community upfront in the plan-making process and may not be able to satisfy the legal requirements for stages of Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA).
- Option 3: Prepare a New Local Plan including a First Steps Engagement consultation. The advantage of this option is that it involves the community upfront in the plan-making process and helps to ensure that the plan is shaped by their input. The disadvantage of this option is that it would take longer to prepare the New Local Plan and would require more resources to deliver.

5.2 Option 3 is recommended as this will deliver a New Local Plan to provide a robust planning framework for the future planning of the borough, which reflects

the Council's corporate priorities, is shaped by upfront and meaningful engagement with Haringey's communities and helps to meet legal requirements for SEA/SA.

6 Background information

6.1 The Local Plan is the main Council document which:

- Planning applications are determined in accordance with (unless material considerations indicate otherwise);
- Sets out a positive spatial framework for development across the borough;
- Acts as a positive spatial expression of the Council's wider corporate strategies and policies, including the Borough Plan; and

6.2 It is important to keep the Local Plan up-to-date so that:

- It provides a robust basis for determining planning applications;
- It continues to represent the latest Council corporate strategies, policies and aspirations;
- Legal and policy requirements to keep Local Plans up-to-date are met.

National legislation, policy and guidance

6.3 The main legislation, policy and guidance relevant to Local Plans which is referenced throughout this report includes:

- Planning and Compulsory Purchase Act 2004 ('the Act');
- The Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations');
- National Planning Policy Framework (NPPF) (June 2019); and
- National Planning Practice Guidance (PPG): Plan Making (2020).

6.4 The Act states that the Council "must keep under review their [Local Plans]" and "may at any time prepare a revision of a [Local Plan]" (S17(6) and 26(1)). In preparing a Local Plan the Council must have regard to "national policies and advice contained in guidance issued by the Secretary of State" (SoS), the London Plan, and the "resources likely available for implementing the proposals in the document" (S19(2)).

6.5 Local Plans are legally required to be reviewed every five years (Regulation 10A). The NPPF states that "Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy".

6.6 The Government published a Planning Update in response to COVID-19 on 13 May 2020 which states "We continue to want to see Local Plans progressing through the system as a vital means for supporting economic recovery in line with the Government's aspirations to have plans in place across the country by 2023".

6.7 The NPPF states (paragraphs 15-16, emphasis added):

"The planning system should be genuinely plan-led. Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings."

"Plans should:

a) be prepared with the objective of contributing to the achievement of **sustainable development**;
b) be prepared positively, in a way that is **aspirational but deliverable**;
c) be shaped by early, proportionate and **effective engagement** between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;
d) contain policies that are **clearly written** and unambiguous, so it is evident how a decision maker should react to development proposals;
e) be **accessible** through the use of digital tools to assist public involvement and policy presentation; and
f) serve a clear purpose, **avoiding unnecessary duplication** of policies that apply to a particular area (including policies in this Framework, where relevant)."

6.8 The NPPF sets out the "tests of soundness" which Local Plans must pass at the independent examination stage. Plans are sound if they are (paragraph 35):

- **Positively prepared** – i.e. meeting objectively assessed needs;
- **Justified** – i.e. taking into account reasonable alternatives and based on proportionate evidence;
- **Effective** – i.e. deliverable and based on effective joint cross-boundary working; and
- **Consistent with national policy** – i.e. in accordance with the NPPF.

6.9 Further national guidance on Local Plans is provided in the national Planning Practice Guidance (PPG) on Plan Making.

<u>Intend to Publish London Plan (2019)</u>

6.10 The Act states that Local Plans in London "must be in general conformity with" the London Plan (S24(1)).

6.11 Since 2016 the Mayor of London has been preparing a New London Plan. The steps towards publication are:

- **November 2017** – Draft New London Plan published for public consultation
- **March 2018** – Haringey's response to the consultation was considered in a report by the Housing & Regeneration Scrutiny Panel
- **July 2018** – Submitted for examination in public
- **January – May 2019** – Examination hearings
- **July 2019** – Consolidated changes version published
- **October 2019** – Panel Inspectors' report published, examination closed

- **December 2019** – Published an 'Intend to Publish' version – some of the Inspectors' recommendations were accepted, others weren't – and submitted to the SoS
- **March 2020** – SoS wrote to the Mayor giving Directions that specific changes should be made to the plan before the final version is published
- **April 2020 -** Mayor wrote back to the SoS indicating that amendments would be needed to the Directions to ensure they are workable in practice
- **Current stage** – Work ongoing between the Mayor and SoS to agree text of the New London Plan
- Mayoral decision to publish the final London Plan
- SoS to confirm the Mayor has complied with the Directions
- Mayor to publish final London Plan (including Statutory Notifications) – expected during 2020

6.12 The key chapters / policies in the new London Plan include:

- **Good Growth objectives**
- **Spatial Development Patterns & Opportunity Areas** – Wood Green & Lee Valley Opportunity Areas
- **Design** – inclusivity, accessibility, tall buildings
- **Housing** – targets, affordability, tenure, viability, size mix
- **Social Infrastructure** – health, education, play, sport
- **Economy** – offices, workspace, industry, retail)
- **Heritage & Culture** – conservation areas, creative industries, night time economy
- **Green Infrastructure & Natural Environment** – open space, urban greening, biodiversity
- **Sustainable Infrastructure** – air quality, greenhouse gas emissions, digital, waste, flooding
- **Transport** – healthy streets, cycling, car parking

6.13 Whilst the Intend to Publish London Plan sets a range of targets and policy requirements for any new Haringey Local Plan, of particular note is the housing target. The existing adopted London Plan (2016) set Haringey's current housing target at 1,502 homes per year. The Draft New London Plan (2017) proposed to increase this to 1,958. Haringey and many other London Boroughs objected to the significantly increased housing targets and in response the Inspectors' Report recommended the target be revised to 1,592. The Mayor has accepted this recommendation.

<u>Existing Haringey Local Plan (2017)</u>

6.14 The existing adopted Haringey Local Plan was updated/adopted in July 2017 comprising the following documents:

- **Strategic Policies;**
- **Development Management (DM) Development Plan Document (DPD);**
- **Site Allocations Development Plan Document (DPD); and**
- **Tottenham Area Action Plan (AAP).**

6.15 Other existing and emerging planning policy documents which currently or will make up the statutory 'Development Plan' in Haringey alongside the Local Plan include:

- **North London Waste Plan (NLWP)** – currently at the examination stage, scheduled for adoption in early 2021;
- **Wood Green Area Action Plan (AAP)** – a 'Preferred Option' draft was consulted on in February 2018 with a 'Proposed Submission' draft to be consulted on in 2021 before it is submitted for examination;
- **Highgate Neighbourhood Plan** – adopted in July 2017;
- The **Neighbourhood Forums** in **Crouch End** and in **Finsbury Park and Stroud Green** are also working on drafting Neighbourhood Plans; and
- **The London Plan** – adopted in March 2016, to be replaced by the New London Plan in late 2020.

New Haringey Local Plan

6.16 The four existing Haringey Local Plan documents (Strategic Policies, DM Policies, Site Allocations, Tottenham AAP) will be completely replaced by the New Haringey Local Plan in a single document. It is proposed that the New Local Plan will have a 15 year timeframe, starting from adoption in 2022 and covering the period to 2037.

6.17 The New Haringey Local Plan will be structured based on the Borough Plan priorities **Housing**, **People**, **Place** and **Economy**.

6.18 As the Intend to Publish London Plan is expected to become part of the statutory Development Plan once it is published (adopted) in late 2020, the New Haringey Local Plan does not need to duplicate policies in the London Plan which the Council is satisfied accords with its own objectives and aspirations. Therefore, within the structure of the Borough Plan priorities, the New Haringey Local Plan will, to an extent, follow a similar structure to, and signpost policies in, the New London Plan.

6.19 However, many policies do require a locally-specific Haringey variation to ensure the New Haringey Local Plan policies are compatible with the Council's wider corporate strategies and policies. These locally-specific policies will require a substantial local evidence base to justify a Haringey-specific approach.

Plan-making process

6.20 The Regulations set out the key processes that the Council must follow when preparing a New Local Plan.

6.21 Regulation 18 provides a considerable degree of flexibility as to how a Local Plan is produced. As a minimum, the Council must notify relevant organisations (as defined by the Regulations) of the subject of the Local Plan and invite each of them to make representations about what the Local Plan ought to contain. The Council must then take into account the representations made. Regulation 19 then requires the Local Plan to be published and relevant stakeholders (as

defined by the Regulations) be invited to submit 'Regulation 20' representations prior to the Submission of the Local Plan for independent examination.

6.22 Whilst there is no legislative or regulatory requirement to do so, the Council may decide that further consultation and engagement is required over and above that set out in paragraph 6.21 either due to the scope and extent of the Local Plan or because local circumstances warrant it. Given the intent to prepare a completely new Local Plan rather than review and update parts of the existing Local Plan and in order that the community is engaged up-front in the plan-making process and is able to shape the New Local Plan in a meaningful way it is proposed to have two Regulation 18 consultations. The first Regulation 18 consultation will be this '**New Local Plan – First Steps Engagement'** which will set out the key policy areas to be addressed by the New Haringey Local Plan, ask open questions and seek views on reasonable options available to the Council, before the Local Plan and its policies are actually drafted. The Council will then carry out a second Regulation 18 engagement on a Draft Local Plan, which will contain draft policies, having considered the results of the First Steps engagement.

Timetable

6.23 The Act requires Local Plans to "be prepared in accordance with the Local Development Scheme" (LDS) (S19(1)).

6.24 The Council's latest LDS was published in November 2019. As a result of a delay in getting a full Planning Policy Team in place and also COVID-19 the timetable for preparing the New Local Plan has been slightly delayed. Table 1 below sets out the LDS programme together with the revised indicative programme. The LDS will be updated at a later point to reflect the amended timetable.

Table 1: New Local Plan timetable

Document	Regulation	Date in LDS	Revised date
New Local Plan First Steps Engagement consultation	Reg 18	March-May 2020	November 2020-January 2021
Draft Local Plan consultation	Reg 18	October-December 2020	2021
Proposed Submission Local Plan consultation	Reg 19	April-June 2021	2021
Submission & Examination	Reg 22-25	July-December 2021	2021/22
Adoption	Reg 26	February 2022	2022

New Local Plan – First Steps engagement document

6.25 As set out in Table 1, the Council is at the very beginning of the process of preparing the New Local Plan. As a first step a New Local Plan First Steps Engagement document has been prepared for consultation (Appendix A). This sets out the key policy areas to be addressed by the New Local Plan, asks open questions about the issues and challenges facing the future planning of the

borough and seeks views on reasonable options available to the Council to address them. It is intended to begin a conversation about the direction of New Local Plan and as such it does not contain draft policies.

6.26 The document is split into six sections with a focus on the four Borough Plan priorities. Table 2 below gives an overview of the sections and their key content.

Table 2: First Steps Engagement document – Overview

Section	**Title**	**Overview**
Section 1	New Local Plan: What, why, how and when?	Addresses what a Local Plan is, why the Council is preparing a new one and what the process is for doing so
Section 2	How do I have my say?	Gives an overview of how people can respond to the consultation and have their say on the New Local Plan
Section 3	The big picture	Provides an overview of the key issues and challenges facing the borough broken down by Borough Plan priority. It also contains a draft vision of what Haringey should look like in 15-20 years together with the growth that the borough is expected to accommodate over that period as set out within the London Plan.
Section 4	Our neighbourhoods	Considers the issues and challenges facing Haringey's places including the borough's two opportunity areas, its town centres and high streets, and seven different areas within the borough.
Section 5 (Our Borough Priorities)	Housing	Considers the issues, challenges and options relating to housing including housing supply, affordable housing, existing stock, housing mix, quality and accessibility, and specialist housing. A key focus is on how the New Local Plan can increase the number of genuinely affordable homes in the borough. The section is clear about the Council's direction following the adoption of a revised Appendix C to the Haringey Housing Strategy (2017-22) in 2019 and in the context of the emerging new Housing Strategy.
	People	Considers issues, challenges and opportunities relating to social infrastructure such as education, health and community facilities which is needed to enable residents to thrive.

	Place	Considers issues, challenges and opportunities relating to the quality of Haringey's environment. It covers a wide array of topics including design, heritage and culture, climate change and sustainability, green infrastructure and the natural environment, play and recreation and transport. The climate change and sustainability section builds on the Council's Draft Climate Change Action Plan which sets a target for the borough to be carbon neutral by 2041.
	Economy	Considers issues, challenges and opportunities relating to Haringey's economy including recovery and renewal from COVID-19. It addresses office and workspace, industry, shops and high streets, and skills and employment and training opportunities. It responds to the Council's commitment to community wealthbuilding and the key theme in the Council's emerging Economic Development Strategy such as a good economy.
Section 6 (Our Future Growth)	Approach to growth	Identifies a range of potential growth approaches to achieve the London Plan growth targets. These include key growth areas, key road corridors, town centres, intensification close to stations and town centres, suburban intensification and housing delivery on employment land.
	Call for sites	Seeks to find out about potential sites that might be suitable for development. It links to a separate form for site submissions.
	Site specific proposals	Seeks views on the site allocations in the current Local Plan and whether they should be kept, changed or deleted.

6.27 The document repeats key themes throughout including:

- Reducing inequality and making Haringey a fairer place
- Addressing the housing crisis
- Addressing the causes and effects of climate change
- Supporting recovery and renewal from the effects of COVID-19
- Building and retaining wealth in Haringey's communities

<u>Call for sites</u>

6.28 As part of the consultation, the Council will also carry out a 'call for sites' consultation. Government guidance requires local planning authorities to conduct a 'call for sites' exercise as a key component of the strategic assessment for housing and economic needs, and to inform policies and site allocations in the New Local Plan for housing, employment and other uses. Following this 'call for sites' exercise, the Council will also have a better understanding what land may become available during the Local Plan period. A 'call for sites' exercise does not mean that the Council will have to allocate the suggested sites for development, but the Council will be able to assess from a potentially large number of sites their suitability, availability and deliverability

Evidence Base

6.29 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. Officers have scoped out the evidence base required and have begun commissioning key evidence to inform the New Local Plan including a Strategic Housing Market Assessment. The documents are likely to include (non-exhaustive):

Whole Plan Viability Assessment (including Affordable Housing);
Strategic Housing Market Assessment (SHMA);
Gypsy & Traveller Accommodation Needs Assessment (GTANA);
Strategic Housing Land Availability Assessment (SHLAA);
Small Sites Study;
Employment Land Review / Need & Availability Study (ELR/ELNA);
Retail & Leisure Needs Study (RLNS);
Open Space, Sports & Recreation / Green Grid / Playing Pitch Studies;
Strategic Flood Risk Assessment (SFRA), Surface Water Management Plan (SWMP) and Sequential & Exception Site Testing;
Transport Assessment / Study;
Archaeological Priority Area (APA) Review; and
Infrastructure Delivery Plan (IDP) / Infrastructure Funding Statement (IFS).

Integrated Impact Assessment (IIA)

6.30 With regard to sustainability, the Act requires Local Plans to:

- "include policies designed to secure that the development and use of land in the LPA's area contribute to the mitigation of, and adaptation to, **climate change**" (S19(1A));
- "carry out an **appraisal of the sustainability** of the proposals… [and] prepare a report of the findings of the appraisal" (S19(5)); and
- "exercise the function with the objective of contributing to the achievement of **sustainable development**" (S39(2)).

6.31 An Integrated Impact Assessment (IIA) will be prepared and updated alongside each iteration of the New Haringey Local Plan to ensure the impacts on the following are fully considered, as required by legislation, policy and guidance:

- **Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA)** – required by The Environmental Assessment of Plans and Programmes Regulations 2004 and the PPG on SEA/SA;
- **Habitats Regulations Assessment (HRA)** – required by the Conservation of Habitats & Species Regulations 2017 and the PPG on Appropriate Assessment;
- **Health Impact Assessment (HIA)** – recommended by the PPG on Healthy & Safe Communities;
- **Equalities Impact Assessment (EqIA)** – required by the Equality Act 2010.

6.32 Alongside the New Local Plan – First Steps Engagement consultation document an Integrated Impact Assessment (IIA) Scoping Report has been prepared for consultation (Appendix B). The IIA Scoping Report forms the initial 'Stage A' of the IIA process and consists of a collection of baseline data and information on other plans, policies and programmes that can have an influence on the production of the New Local Plan. The Scoping Report establishes the context and determines the scope of the subsequent IIA report.

Consultation

6.33 The Act requires the Local Plan to be prepared in compliance with the Council's Statement of Community Involvement (SCI, March 2017) (S19(3)). The SCI sets out the aim that consultation will be:

- Effective;
- Transparent;
- Proportional;
- Inclusive;
- Accountable; and
- Coherent

6.34 The SCI also commits to publishing all Local Plan documents for at least a six-week period. Regulation 35 of the Regulations also provides that Local Plan documents should be made available for at least 6 weeks.

6.35 As this is the first opportunity for residents, business and other local stakeholders to help shape the New Local Plan and the scope of the consultation is very broad it is proposed that The New Local Plan – First Steps Engagement document and accompanying Integrated Impact Assessment (IIA) Scoping Report are published for public consultation for at least 8 weeks. It is also considered that this extra time is necessary to support effective engagement in a period where COVID-19 is having major impacts on the lives of residents. Subject to Cabinet approval, the consultation will take place from mid November 2020.

6.36 A comprehensive Communications and Engagement Plan has been prepared to ensure compliance with the SCI and support the objective of achieving effective, representative engagement with the public and key stakeholders (Appendix C). The Communications and Engagement Plan includes:

- Local Plan branding;

- Council website articles, banners and webpages;
- Online questionnaire;
- Social media;
- Microsoft Teams live events;
- Videos;
- Press release;
- Local newspaper notices;
- Posters;
- Haringey People & Haringey Extra articles;
- Haringey Business Bulletin;
- Emails/letters sent to those on the Planning Policy consultation database, Members, MPs;
- Availability of documents in local libraries;
- Citizens Panel;
- Agents Forum;
- Drop-ins and/or themed workshops;
- Specific strategies for target groups including children and young people; and
- Diversity monitoring.

6.37 The Act requires the Council to fulfil a statutory "duty to cooperate" with "prescribed bodies", including neighbouring boroughs and Government agencies, requiring the Council to "engage constructively, actively and on an ongoing basis" relating to "strategic matter[s]" which include cross-borough and strategic infrastructure issues (S33A). Officers will engage with prescribed bodies as part of the consultation on the New Local Plan First Steps Engagement and on an ongoing basis as part of the plan-making process.

Risks

6.38 There are a number of risks to the delivery of the New Local Plan and its timetable, which include:

- **Government reforms**
- **Market uncertainty related to Brexit and COVID-19**;
- **SoS final response to the London Plan**;
- Decisions on **Crossrail 2** stations;
- Joint working with neighbouring boroughs and other statutory bodies through the statutory **Duty to Cooperate**;
- **Staff, resources & competing work demands** on the Planning Policy Team;
- **Planning Inspectorate** resources, timetabling & handling of the examination;
- **Conformity with the NPPF & London Plan**; and
- Achieving the **housing target** and being able to demonstrate a **5 Year Housing Land Supply (5YHLS)** of 'deliverable' sites.

7 Regulatory Committee Comments

7.1 The proposals which are the subject of this report were considered by Regulatory Committee on 5 October 2020. The key matters discussed are set out in an addendum to this report.

8 Contribution to strategic outcomes

8.1 The New Haringey Local Plan is cross-cutting and contributes to all the Borough Plan priorities of Housing, People, Place and Economy and the Borough Plan Equality Principles and the Pledges on Residents' Engagement, Voluntary & Community Sector and Businesses are highly relevant.

8.2 The Year 1 and Year 2 Delivery Plans for the Housing Priority include "Deliver new Local Plan" as the first delivery priority under Outcome 1) Objective a).

8.3 The Local Plan is also an important part of the borough's 'recovery and renewal' from COVID-19. As further iterations of the New Local Plan emerge, it will take account of the Council's emerging recovery strategies.

9 Statutory comments

Finance

9.1 The main recommendation is for Cabinet to approve public consultation on the New Haringey Local Plan First Steps Engagement consultation document. This is the first step in the process of preparing a New Local Plan for the borough.

9.2 The New Local Plan requires an ongoing budget for staff, evidence base and consultation costs which is to be met within the Planning Policy Team budget.

Procurement

9.3 Where evidence base documents cannot be completed within the Planning Policy Team or within other teams in the Council, the relevant procurement process will be followed to commission and manage external consultants to undertake the work. Joint cross-borough working will also be considered where relevant and practical.

Legal

9.4 The main legislation, policy and guidance relevant to Local Plans is summarised throughout this report.

9.5 The proposed consultation process in respect of the Local Plan: First Steps Engagement consultation document and the accompanying Integrated Impact Assessment Scoping Report are compliant with the provisions of Regulation 18.

Equality

9.6 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

9.7 The three parts of the duty apply 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.

9.8 The proposed decision is to approve for public consultation the New Haringey Local Plan: First Steps Engagement consultation document (Appendix A). This consultation document has been published alongside an Integrated Impact Assessment Scoping Report (Appendix B) and Consultation and Engagement Plan (Appendix C). These documents set out the steps the Council will take to consult and engage with the general public on the New Local Plan, including individuals with protected characteristics.

9.9 The purpose is therefore to gather the views of the public on important issues and challenges in advance of developing the New Local Plan. The consultation process has been designed to gather a range of views, including those of individuals with protected characteristics. The document is intended to begin a conversation about the direction of the New Local Plan and as such it does not contain draft policies.

9.10 This decision will allow for consultation to proceed on the New Haringey Local Plan: First Steps Engagement consultation document (Appendix A), in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012. The Council will then carry out a second Regulation 18 engagement on a Draft Local Plan, which will contain draft policies, having considered the results of the First Steps engagement. This will allow for further opportunities for consultation with people with protected characteristics and representative groups.

9.11 The Integrated Impact Assessment (IIA) Scoping Report (Appendix B), published alongside the consultation document, forms the initial stage of the IIA process which will ensure the impacts for sustainability, habitats, health and equalities are considered as required by legislation, policy and guidance. The IIA Scoping Report is therefore the initial stage of the equalities process which will be ongoing as the IIA is developed. It sets out a baseline of relevant data and information and provides the context and scope for the subsequent IIA report to be published alongside future iterations of the New Local Plan.

9.12 The IIA Scoping Report includes policy context, baseline and projections, health and equalities impacts and brief discussion of key issues, opportunities and objectives for the four priority areas of the Haringey Borough Plan 2019-2023 (People; Place; Housing; Economy). Paying due regard to equalities, the Scoping Report details key areas of concern for each of priority area before defining objectives for the IIA. In this way the IIA Scoping Report highlights

existing inequalities and describes potential areas of work whereby the Council can achieve its equalities objectives through the development of the New Local Plan and the IIA. The IIA considers how policies that may be developed through the New Local Plan might positively impact outcomes for people with protected characteristics.

9.13 The Communications and Engagement Plan (Appendix C) describes how the consultation will allow the public to be involved with shaping the direction of the New Local Plan from the earliest opportunity. The plan sets an ambition to achieve a representative response. To do this it identifies a requirement to develop new approaches to target groups that are often underrepresented through consultation processes. These groups are: Young people; LGBT+; Disabled people; BAME; people with language barriers; Gypsies and Travellers. The Communications and Engagement Plan goes on to describe discrete strategies for communicating and engaging with each target group.

9.14 The Communications and Engagement Plan describes potential impacts on each protected characteristic and describes an ambition to ensure the views of people with protected characteristics are fairly reflected in the engagement process of the New Local Plan at an early stage. Specifically, it sets out steps to actively engage with younger people, make materials accessible to disabled people, improve the representation of minority racial groups who are poorly represented in similar engagements, promote engagement through religious organisations and actively seek involvement of LGBT+, disabled and religious groups.

9.15 In advance of policies being developed for the New Local Plan, the Communications and Engagement Plan specifically identifies a need for the engagement process to be representative, highlights groups that are traditionally underrepresented and sets out a plan to ensure the views and opinions of these groups are involved in the first stage of consultation. For example, this includes the provision of accessible documentation to people with sensory disabilities and exploring methods for effective communication with people who have English as a second language. In this way the Communications and Engagement Plan seeks to overcome barriers to engagement that traditionally prevent a representative sample, namely: language; accessibility; digital capability; limited communication of the ongoing consultation to all residents. These steps should help to mitigate the risk of an unrepresentative sample and will need to be revisited through the process to ensure success. The second stage of the consultation process, on the Draft Local Plan containing draft policies, will provide an important opportunity deploy revised methods to ensure successful targeting of protected groups.

9.16 The New Local Plan has the potential to result in both negative and positive impacts for people with protected characteristics. By considering the equalities implications of policy development in each New Local Plan topic area, the IIA Scoping Report surfaces existing issues, risks and opportunities prior to the development of policy. The developing IIA will consider the impact on individuals with protected characteristics of developing policies on topics such as housing, health, air pollution and the environment, town centres and the local economy. Where potential negative impacts on individuals with protected characteristics are identified, it will be necessary to set out a strategy for

mitigating those risks. The IIA will be updated and published alongside each iteration of the New Local Plan to ensure equalities issues are addressed and revisited as policies are developed.

10 Use of Appendices

- Appendix A: New Local Plan First Steps Engagement consultation document October 2020
- Appendix B: Scoping Report for Integrated Impact Assessment (IIA)
- Appendix C: Communications and Engagement Plan

11 Local Government (Access to Information) Act 1985

Haringey Local Plan (July 2017):

- Strategic Policies
- Development Management DPD
- Site Allocations DPD
- Tottenham Area Action Plan

Intend to Publish London Plan (December 2019)

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New Local Plan

First Steps Engagement

October 2020

Haringey LONDON



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Foreword



"Our existing Local Plan was adopted over three years ago. Since then, the Council has published a new Borough Plan, driven by the administration's manifesto commitments to reducing inequality. In 2019, Haringey Council declared a Climate Emergency.

We need a new Local Plan to provide a robust and fit-for-purpose planning framework for the borough. It is the framework by which we will make planning decisions for the long-term future of our borough. We need to deliver on the Borough Plan's commitment to genuinely affordable housing for Haringey residents. We need to hard-wire sustainability into planning decisions to achieve our ambitious target of carbon neutrality by 2041. We need to deliver community-led growth for our residents and businesses, and reflect the New London Plan as we do so. The new Local Plan will help us achieve these things.

All of this must be done in the light of the COVID-19 pandemic. The new Local Plan will help us make a broad and lasting recovery.

This First Steps document allows us to engage and consult with residents, businesses and other stakeholders from the very beginning, so that this Local Plan will be shaped at every stage by the people it serves".



Councillor Matt White - Cabinet Member for Planning and Corporate Services



1. The New Local Plan: What, why, how and when?

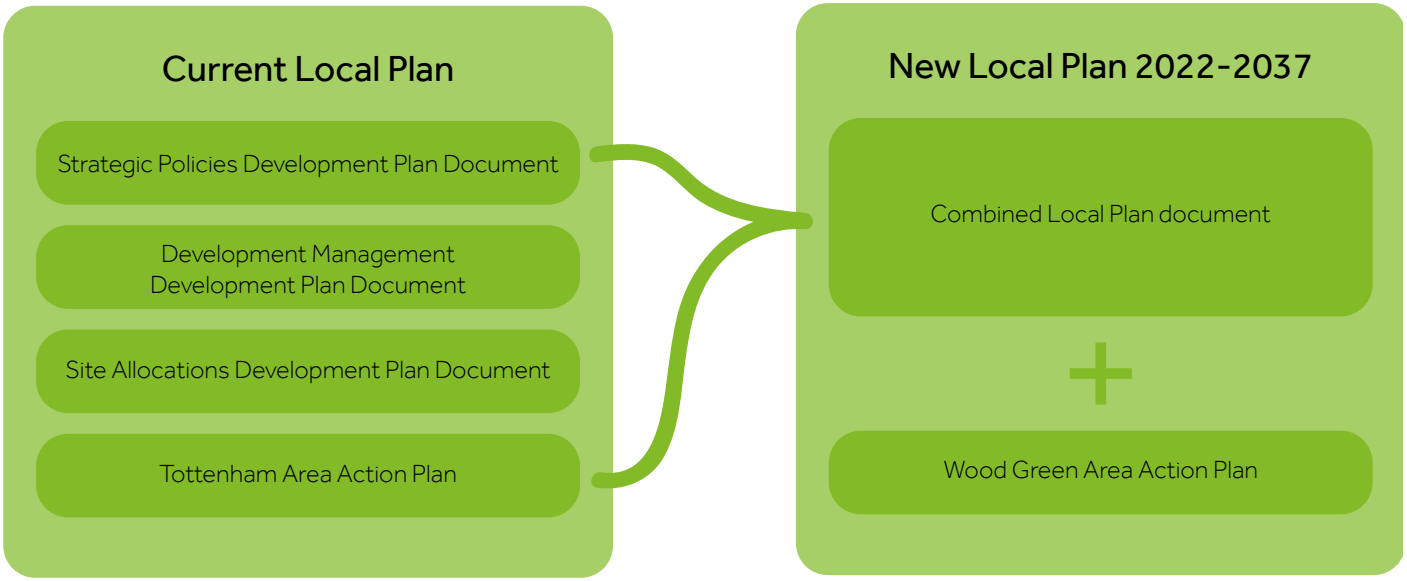
1.1. What is the Local Plan?

The Local Plan is a document that sets out the vision and objectives for future development of the borough. It provides a positive strategy and policies to enable significant growth such as new homes, employment, leisure and cultural facilities and infrastructure, while protecting and enhancing our heritage and natural environment. The Local Plan is used to decide planning applications for new buildings and changes of use in the borough.

Haringey has a current Local Plan which is made up of four separate documents. This was adopted in 2017 and covers the period until 2026. The Council is now looking to develop a New Local Plan covering the period up to 2037. We propose to replace all existing Local Plan documents with a single document (New Local Plan).

Alongside the New Local Plan, the Council is preparing a Wood Green Area Action Plan which sets out an area specific strategy for growth in Wood Green.

This engagement is your opportunity to influence future planning policies that will affect how your neighbourhood changes and how we as a borough address some of our biggest challenges like fighting climate change, improving housing affordability and reducing inequality.



Once adopted, the New Local Plan will form part of Haringey's wider 'Development Plan' which is the starting point for determining applications for planning applications. It will also help to deliver the Council's wider aspirations that are set out in the Borough Plan and in other local strategies and policies.

Development Plan

- London Plan
- New Haringey Local Plan
- Wood Green Area Action Plan
- North London Waste Plan
- Neighbourhood Plans

National Planning Policy Framework

Borough Plan

The New Local Plan will be structured based on the Borough Plan priorities of **Housing**, **People**, **Place** and **Economy**.



1.2. Why a New Local Plan?

We need to ensure the Local Plan is up to date so that we continue to have a robust basis for deciding planning applications that incorporate our overall aspirations.

The main reasons for undertaking this now are:

Reason 1: A New Borough Plan



A new Borough Plan for Haringey was adopted in 2019 setting out our priorities for four years to 2023. New policies within the Local Plan will be integral to help achieve these priorities and associated outcomes. These priorities, which all have equality at their heart, are:

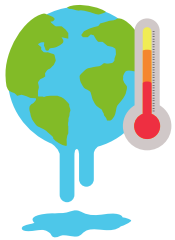
Housing: A safe, stable and affordable home for everyone, whatever their circumstances.

People: Our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential.

Place: A place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green.

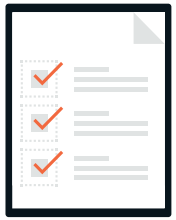
Economy: A growing economy which provides opportunities for all our residents and supports our businesses to thrive.

Reason 2: Declaration of Climate Emergency



In March 2019 we declared a Climate Emergency to tackle climate change and improve the environment now and for future generations. We need to drastically reduce carbon emissions in the borough and become a zero-carbon borough as soon as possible. The Local Plan is a key tool for the Council to address the causes and effects of climate change.

Reason 3: Changes to National Planning Policy and Guidance



It is important to keep the Local Plan up to date so that it can reflect changes in national legislation and recent world events that can have a significant impact on the need for homes, jobs and infrastructure.

In preparing a Local Plan we must have regard to the National Planning Policy Framework (NPPF) and advice contained in guidance issued by the Secretary of State. The NPPF was updated in 2019 and the New Local Plan needs to respond to these changes.

The national Use Classes Order, which puts different 'uses' of buildings and land into different categories to allow certain changes of use without the need for planning permission, has also been updated in 2020 and so the Local Plan's policies need to reflect this.

Reason 4: New London Plan



A new London Plan is due to be published in late 2020. This Plan has a number of strategic London wide growth objectives including setting housing targets and identifying Spatial Development Patterns & Opportunity Areas, which include Wood Green & Lee Valley Opportunity Areas. The Plan also contains detailed policies on design, housing, social infrastructure, heritage & culture, green infrastructure & natural environment, sustainable infrastructure, and transport.

The London Plan forms part of Haringey's 'Development Plan' and our Local Plan is required to be in general conformity with it. The New Local Plan doesn't need to repeat policies that are already included in the London Plan but can signpost them instead. The New Local Plan will focus on policies where a specific Haringey variation is needed to achieve our local aspirations.

Reason 5: Respond to housing delivery challenges



The London Plan sets a range of targets and policy requirements for our new Haringey Local Plan.

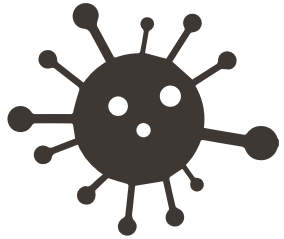
Of particular note are:

- A ten-year minimum housing target of 15,920 homes over the period 2019/20 to 2028/29
- A ten-year minimum housing target of 2,600 homes on small sites over the same period

It is also our priority to maximise the amount of affordable housing built in the borough, with a specific emphasis on the provision of social housing that is genuinely affordable. We are taking ambitious steps to help with this in committing to deliver 1,000 new Council homes, and the Local Plan will contain policies to support this.

With changes to the NPPF, notably in ensuring local planning authorities can demonstrate a deliverable five-year housing land supply and the introduction of the housing delivery test, it is essential that we have pro-active policies in place that can help us meet our housing targets in a sustainable way, and not be subject to the Government's 'presumption in favour of sustainable development'. This applies if we do not have an up to date plan, cannot demonstrate a five year housing land supply, or fail the housing delivery test. If we are subject to the 'presumption in favour of sustainable development' it will make it harder for us to prevent development that conflict with our local policies and aspirations.

Reason 6: Support recovery and renewal from Covid-19

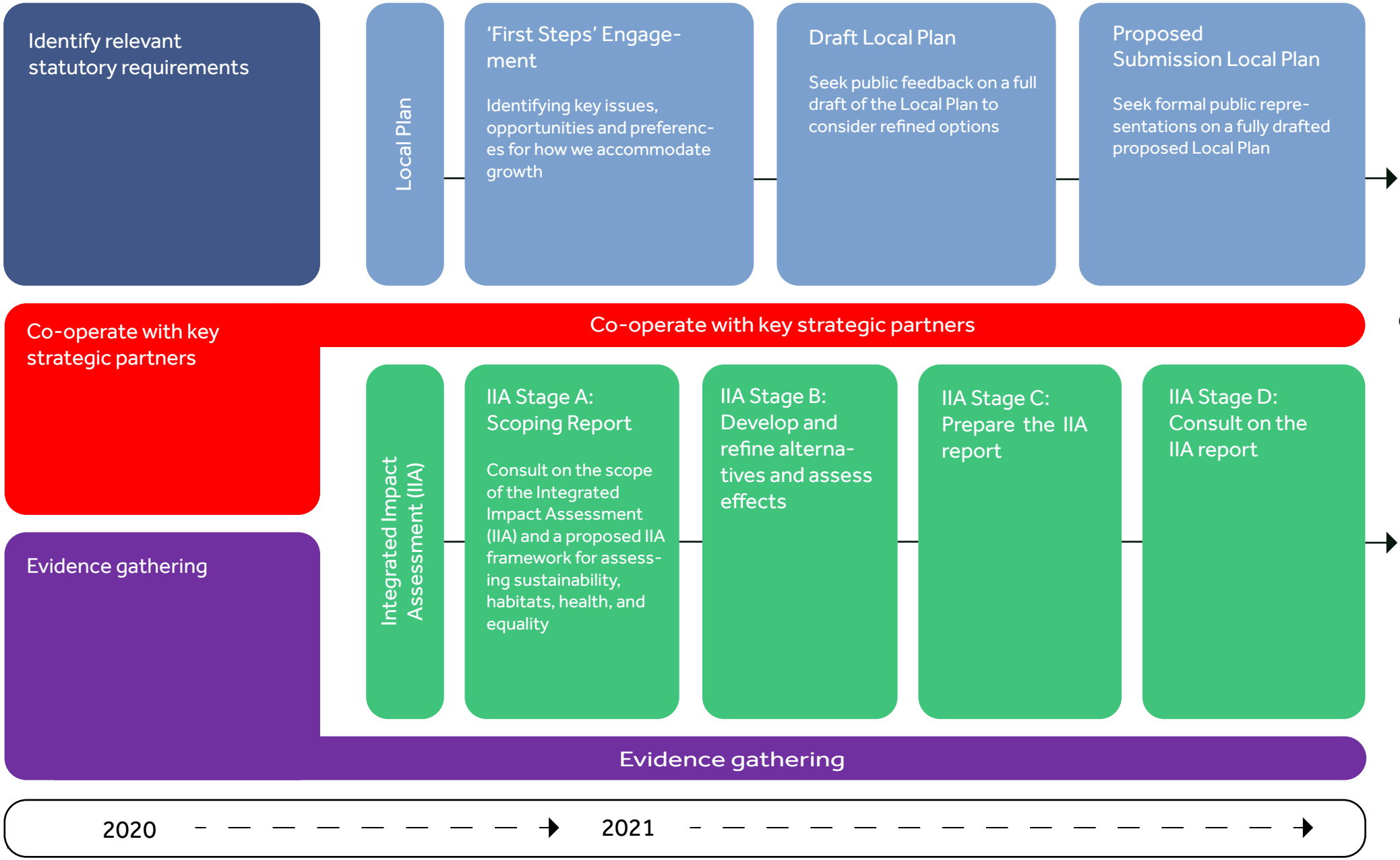


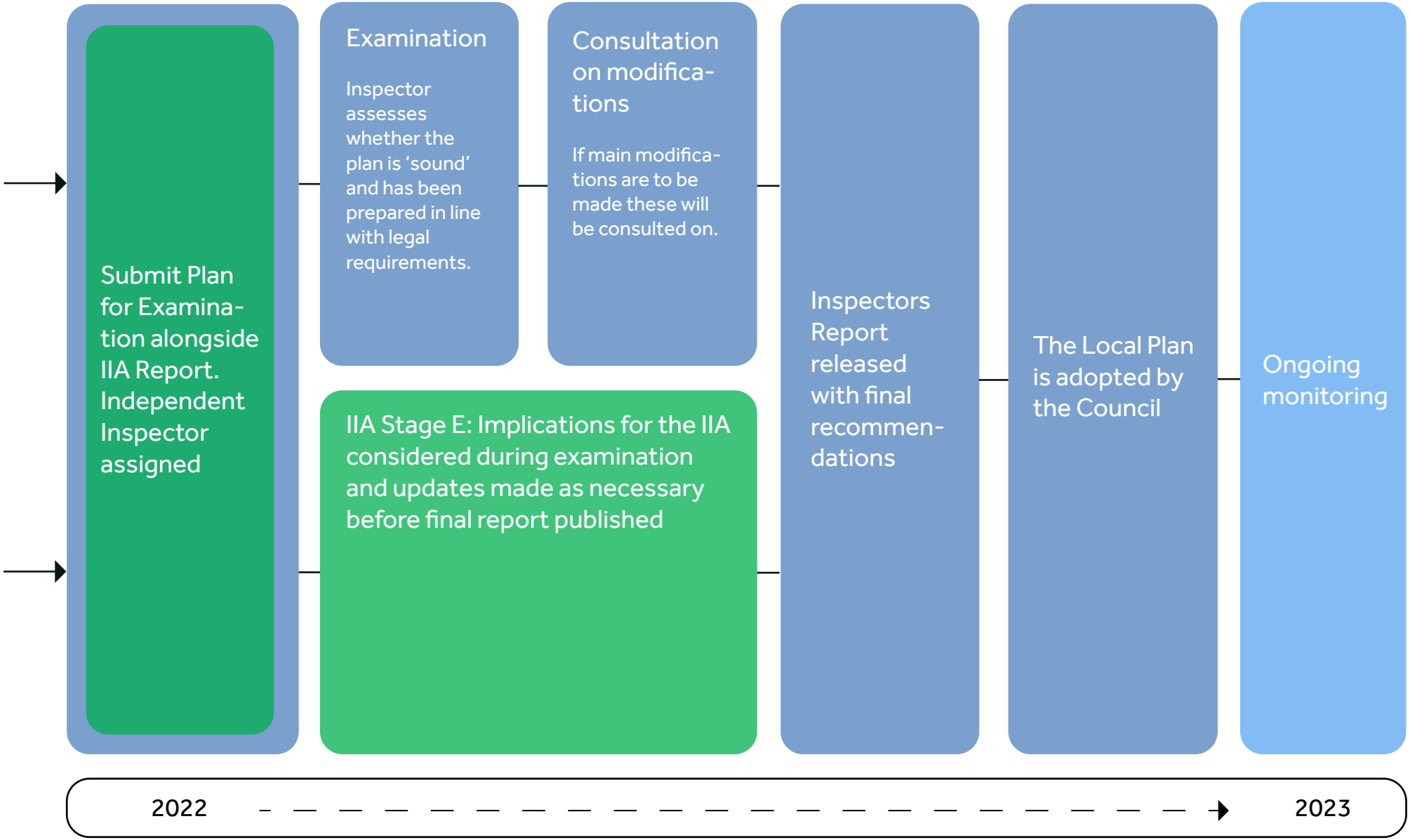
Haringey has been impacted greatly by the COVID-19 pandemic. Our communities have rapidly come together to support each other in a time of crisis, mobilising around the most urgent issues, but there are going to be a range of long-term changes too that we will need to respond to through a New Local Plan including changes to our places, travel patterns and the economy.



1.3. How and when will we develop the New Local Plan?

Developing the New Local Plan will take time as there is a lot to consider. The key components of the process are set out below together with the anticipated timeframes:




Submit Plan for Examination alongside IIA Report. Independent Inspector assigned
Examination
Inspector assesses whether the plan is 'sound' and has been prepared in line with legal requirements.
Consultation on modifications
If main modifications are to be made these will be consulted on.
IIA Stage E: Implications for the IIA considered during examination and updates made as necessary before final report published
Inspectors Report released with final recommendations
The Local Plan is adopted by the Council
Ongoing monitoring
2022
2023

Meeting statutory and policy requirements

We want the New Local Plan to reflect the aspirations and choices of the local community as far as possible. In doing so the Local Plan must comply with specific requirements set out in national planning policy and legislation. It must:

- Be in general conformity with national planning policies set out in the National Planning Policy Framework and associated guidance and the London Plan
- Contribute to the achievement of sustainable development and be supported by a Sustainability Appraisal and Habitat Regulations Assessment
- Meet objectively assessed need for housing, employment, and infrastructure requirements
- Demonstrate joint working on strategic cross-boundary issues
- Be deliverable taking account of infrastructure requirements and viability considerations

In addition, the plan must be prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 which set out the statutory process for plan-making together with a range of other specific requirements of Local Plans.

In August 2020 the Government published a 'Planning for the Future: White Paper' consultation document setting out a package of proposed reforms to the English planning system. If implemented these would involve major changes to how Local Plans should be produced and their contents. As we are at the very beginning stage of the preparing the New Local Plan we consider that there will be opportunity to take account of future changes as we move forward in the plan-making process. We therefore intend to proceed with preparing our New Local Plan.

Developing an evidence base

National policy requires that Local Plans are underpinned by relevant and up-to-date evidence. We are proposing that the following studies will be undertaken to help underpin future versions of this Plan:

- Whole Plan Viability Assessment (including Affordable Housing)
- Strategic Housing Market Assessment (SHMA)
- Gypsy & Traveller Accommodation Needs Assessment (GTANA)
- Strategic Housing Land Availability Assessment (SHLAA)
- Small Sites Study
- Employment Land Study (ELS)
- Retail & Leisure Needs Study (RLNS)
- Parks and Green Spaces Strategy and associated Action Plans
- Strategic Flood Risk Assessment (SFRA), Surface Water Management Plan (SWMP) and Sequential & Exception Site Testing
- Transport Assessment / Study
- Archaeological Priority Area (APA) Review
- Infrastructure Delivery Plan (IDP) / Infrastructure Funding Statement (IFS)

At this early stage we are still considering what additional evidence is required to inform the New Local Plan, particularly in light of the COVID-19 pandemic which has had major and far-reaching impacts on the borough and its people. Depending on responses received to this initial consultation, we may consider additional evidence necessary.

The Local Plan is also informed by, and supports, a range of other strategies for the borough including:

- Housing Strategy 2017-2022
- Climate Change Action Plan
- Economic Development and Growth Strategy (adopted January 2015) (new strategy being prepared)
- Health and Wellbeing Strategy 2015-2018
- Transport Strategy (adopted March 2018)
- Physical Activity and Sport Strategy 2019-2023
- Young People at Risk Strategy 2019-2023

The following documents are currently in the process of being prepared or revised and updated and will also be taken account of as part of the Local Plan preparation process:

- Good Economy Recovery Plan
- Housing Strategy
- Economic Development Strategy
- Parks and Open Space Strategy
- Climate Change Action Plan
- Walking and Cycling Action Plan
- Health and Wellbeing Strategy

Public engagement

The public have a right to influence decisions that affect them and bring invaluable knowledge of their neighbourhoods that will help create good planning policies. This 'First Steps' engagement is to make sure the public have a chance to get involved as early as possible. We will continue to seek public input at each of the key stages in development of the New Local Plan. We will publish a consultation statement after each consultation period, detailing all the feedback we have received on the document and what we propose to do as a result.

Co-operating with key strategic partners

We are subject to a statutory requirement to cooperate with neighbouring boroughs and other prescribed bodies on strategic matters that cross administrative boundaries. This is known as the 'Duty to Cooperate'.

Our neighbouring boroughs, the Mayor of London, Transport for London and prescribed national bodies like the Environment Agency and Natural England are examples of our key strategic partners.

Ensuring we meet sustainability and equality objectives

To ensure the Local Plan contributes positively to sustainability, health and equality objectives it will be informed throughout its preparation by an Integrated Impact Assessment (IIA) - The IIA is designed to ensure that through the development of the Local Plan the effects of its policies, need for any mitigation and reasonable alternatives are adequately considered so that the decision-making process is an informed one. It brings together the following assessments, some of which are requirements and others which are good practice:

- **Sustainability Appraisal** – Promotes sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives when judged against reasonable alternatives
- **Equalities Impact Assessment** – Aims to ensure the policies do not unlawfully discriminate, promote equality of opportunity and foster good relations between people with a protected characteristic and those who do not
- **Health Impact Assessment** – Ensures the plan promotes health gains for the local population, reduces inequality and avoids actively damaging health

A **Habitats Regulation Assessmnt** will also be undertaken as a parallel process to the IIA, to consider whether the plan is likely to have significant effects on a European site designated for its nature conservation interest.

Alongside this First Steps document, we are consulting on the Scoping Report for the IIA of the New Local Plan. The Scoping Report is the first stage in developing the IIA and seeks to identify the scope and level of detail of the information to be included. It sets out the context, objectives and approach of the assessment and identifies relevant environmental, economic and social issues and objectives.



2. How do I have my say?

We want your views on the how the borough can continue to grow and develop. The New Local Plan will affect decisions about your neighbourhood, where you live, work, spend your leisure time and your experiences travelling to these places. It will also make a difference in taking on some of the big challenges we face as a community, such as a lack of affordable housing, climate change and COVID-19.

Please encourage your friends and families to get involved. We would like to receive input from as many people as possible so that the New Local Plan can reflect the aspirations of our diverse community.

Our Statement of Community Involvement (SCI) (March 2017) sets out our aim that consultation will be effective, transparent, proportional, inclusive, accountable and coherent.

This focus of this 'First Steps' document is on engaging early with our stakeholders and communities to be sure that we have captured the main issues and opportunities the borough faces and understand community preferences as to how we address them.

Each section contains information on relevant plans and policies that should be considered, currently identified issues and opportunities, and ideas and options for addressing/ implementing them. At the end of each section is a list of questions we would like your thoughts on. Your response does not need to address all these questions and does not need to be limited by them.

The SCI contains a commitment that we will publish all Local Plan documents for at least a six-week period. As this is the first opportunity for residents, business and other local stakeholders to help shape the New Local Plan and the scope of the consultation is very broad this document and accompanying Integrated Impact Assessment (IIA) Scoping Report are published for public consultation for 8 weeks. It is also considered that this extra time is necessary to support effective engagement in a period where COVID-19 is having major impacts on the lives of residents.

Engagement is open from XXXX until XXXX.

The main source of information on the New Local Plan First Steps Engagement is our website:

www.haringey.gov.uk/newlocalplan

We would prefer to receive your comments via email to:

Planning.Policy@haringey.gov.uk

Alternatively, you can submit comments via post to:

Planning Policy, Haringey Council, 6th Floor, River Park House, Wood Green, London, N22 8HQ

To respect social distancing requirements and reduce health risks, we will be providing additional consultation material through our New Local Plan website, including videos, presentations, and virtual questions and answer seminars with Council staff. Details on when these events will take place and how to register are set out on the website.

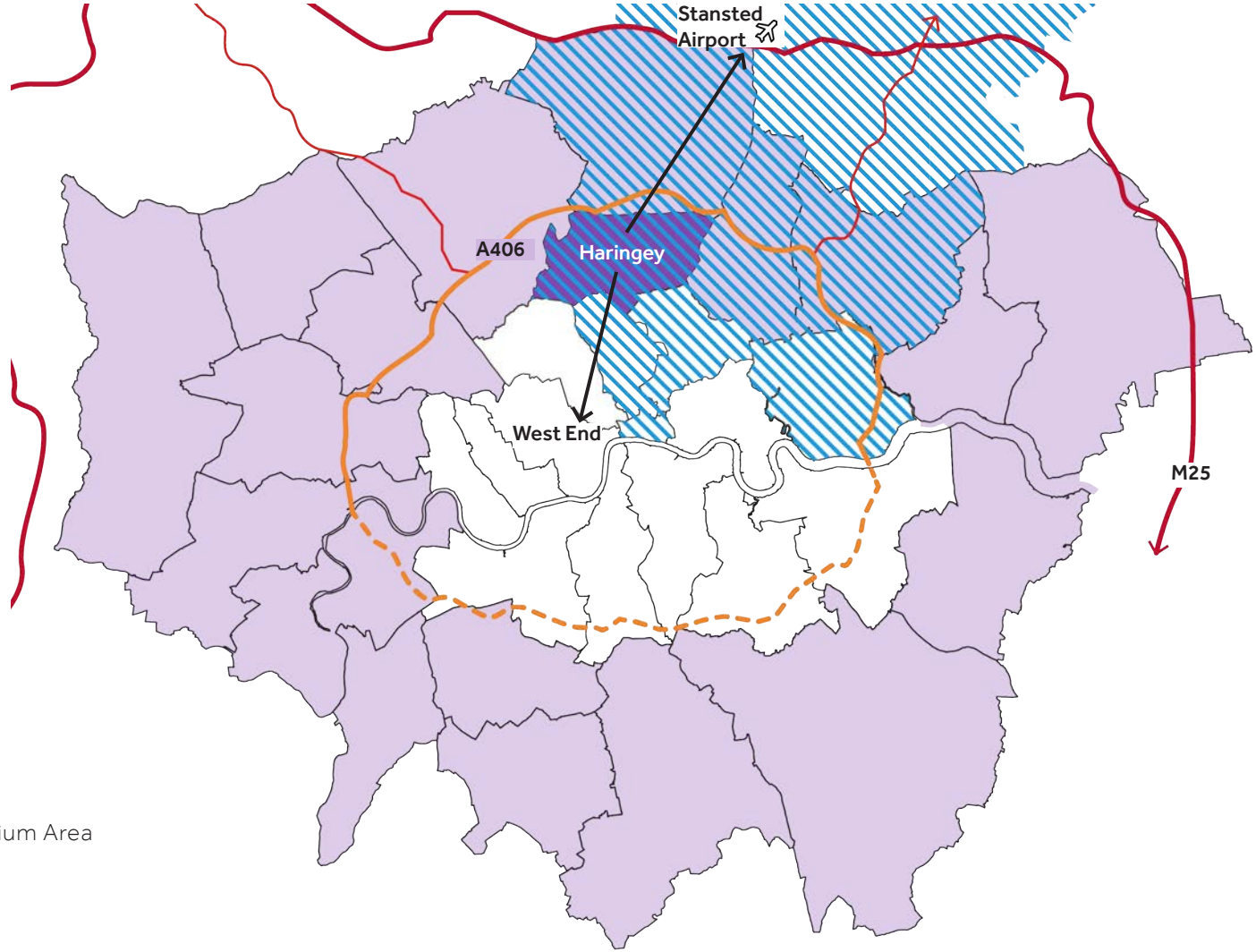
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If you have any questions or experience any difficulty in accessing consultation material or submitting your representations, please contact us via email at **Planning.Policy@haringey.gov.uk** or by telephone on **020 8489 5965**.

3. The Big Picture

Haringey is situated in north London within the Outer London group of boroughs, although it has good links to central London. It covers an area of more than 11 square miles and was estimated in 2018 to have a total resident population of almost 283,000.

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



KEY

- Outer London
- London-Standsted-Cambridge Consortium Area

3.1. State of the borough

It is important that the New Local Plan is prepared based on a robust understanding of the borough and a sound knowledge of how it is likely to change.

In the first instance, it is necessary to acknowledge the enormous impacts which the COVID-19 pandemic has had on Haringey. While the virus itself is primarily a public health issue, the unprecedented responses the pandemic has necessitated means that is also an economic and social crisis. COVID-19 has caused a variety of urgent issues and resulted in rapid changes to how people live and work. Many of the urgent issues have wide-ranging and long-reaching consequences and it is likely that many of the changes could remain in the medium to longer-term. The Council has been collecting data and information to support its emergency response to COVID-19 and this is ongoing to support the actions we are taking.

The following infographics provide an overview of key issues facing the borough and the related challenges and include detail on COVID-19 impacts where the Council has evidence in this regard.



Housing

London

Has not been building enough new homes to meet its housing needs

HOUSE PRICES AND RENT

House prices and rents have never been higher compared to incomes

OVER THE LAST

40

YEARS

shrinking supply of genuinely affordable housing

There are issues with both over-crowding and under-occupation

A result of these failures in Haringey has been

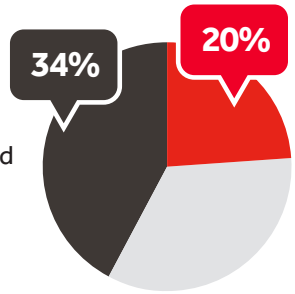
- Major decline in owner occupation
- Decline in social rented housing
- Private rented sector going up

The consequences of which are:

- Growth in overcrowding, homelessness and rough sleeping.
- Increased levels of poverty, indebtedness, evictions and forced relocations.

Haringey

As of 2018 most residents lived in a rented property



renting from a private landlord

local authority or a housing association

Home ownership is out of reach for many of Haringey's existing residents.

Rising private rent levels in Haringey have increased the number of households who need assistance from the Council.

IN 2019 MORE THAN

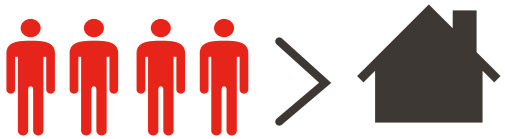
3,000 RENT

households in Haringey were living in temporary accommodation (statutory homeless)

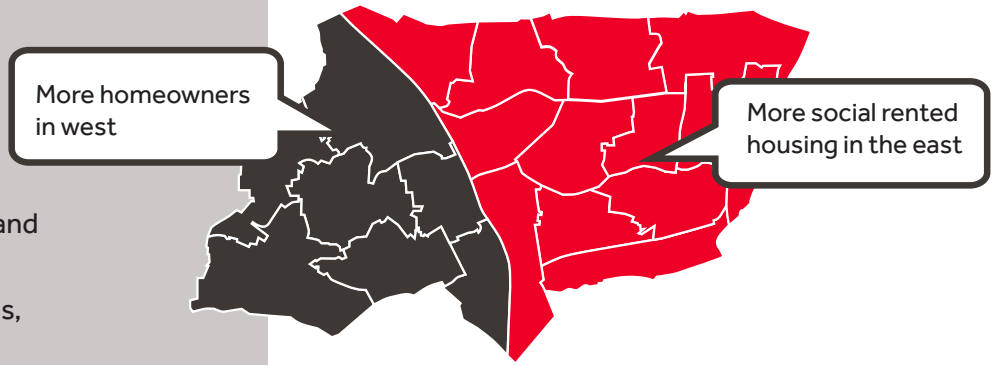
The proportion of renters has increased while the proportion of home owners decreased



The COVID-19 pandemic has demonstrated very clearly the **essential role of housing in supporting public health.** Social tenants and private renters have been particularly exposed to the crisis



Rising private rent levels in Haringey have increased the number of households who need assistance from the Council





There are major risks to wellbeing from living in overcrowded homes without access to quality open spaces

People

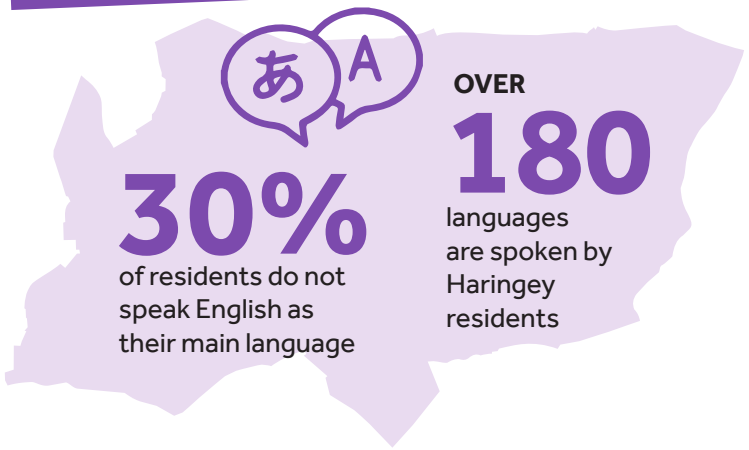
DIVERSITY

HARINGEY IS A HIGHLY DIVERSE BOROUGH



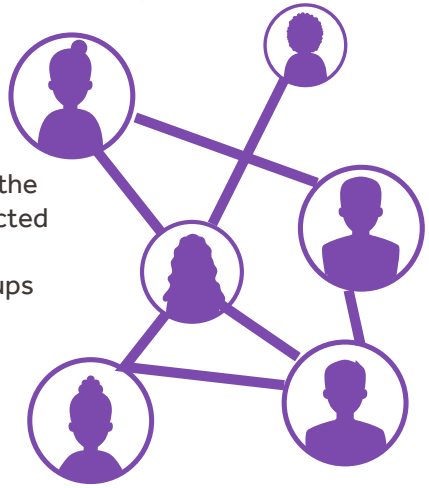
38% Black and Minority Ethnic (BME) groups

LANGUAGE



30% of residents do not speak English as their main language

OVER 180 languages are spoken by Haringey residents

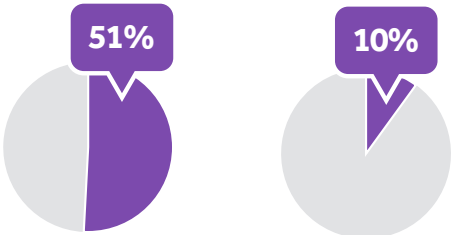


The diversity of the borough is reflected by a mosaic of community groups and networks

AGE

The borough has a young population

IN 2018



UNDER 35 **65+**



EXPECTED INCREASE IN POPULATION BY

4% by 2028



LARGEST INCREASE WILL BE IN OLDER AGE GROUPS

However the over 65 population is only projected to account for 12% of the population in 2028

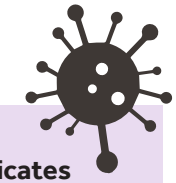
INEQUALITY

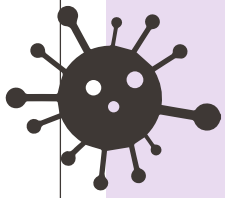


Haringey is a relatively deprived borough, ranking **49 out of 317** Local Authorities in England and 4th in London.



Levels of deprivation are uneven across the borough with the most deprived areas more heavily concentrated in the east.





Emerging evidence indicates that COVID-19 will have disproportionate impacts upon already vulnerable and disadvantaged groups'

Place

It benefits from a varied historic environment which includes **28 conservation areas**, **286 statutory listed buildings and 36 Historic Parks and Gardens**

Wood Green is one of 13 Metropolitan Centres across London

Haringey most familiar local landmarks include Alexandra Palace, Bruce Castle and Tottenham Hotspur Football Stadium



Haringey has many unique town centres and high streets centres including Green Lanes, Tottenham High Road historic corridor and specialist centres like Crouch End

We have over **120 venues where cultural activity take place** and over **70** annually occurring **cultural events**. As of 2019 there were **2,700 creative and cultural industry enterprises** in Haringey making a key contribution to the local economy

Crime has been steadily declining in Haringey but some neighbourhoods and some groups remain much more likely to fall victim to crime than others with knife crime a key issue. Feelings of safety after dark, particularly in some parts of the east of the borough, are a key concern for people in the borough

Residents report a strong sense of place and community. 78% say they have good friendships and/or associations in their local area, while 83% say relations between different ethnic and religious communities are good.



Haringey has good radial transport links into central London by

ROAD

UNDERGROUND

RAIL

Convenient access to **Heathrow** and **Stansted** airports.

3 **UNDERGROUND LINES**

3 **NATIONAL RAIL LINES**



serve **four underground stations, nine rail stations and three rail/underground interchanges.**



Cycle Superhighway 1

runs through the east of the borough providing a safe and convenient route into the City, however, the borough's cycling infrastructure is not as developed as many other London boroughs

Congestion

is a key issue for our main road network particularly at key hotspots such as town centres contributing to health concerns arising from poor air quality and noise





We declared a

Climate Emergency

in March 2019 reflecting our desire to drastically reduce carbon emissions in the borough and become a zero-carbon borough as soon as possible

We published a draft

Climate Change Action Plan

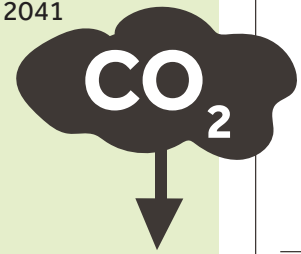
in March 2020 with a 2027 target for the Council to be zero-carbon and a 2041 target for Haringey as a whole

ZERO-CARBON COUNCIL BY

2027

ZERO-CARBON BOROUGH BY

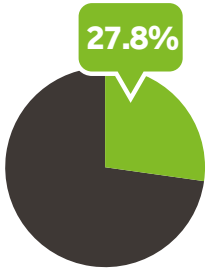
2041



HARINGEY HAS REDUCED ITS CARBON EMISSIONS BY

35.9%

since 2005



OPEN SPACES IN HARINGEY



THE BOROUGH HAS

25 **Green Flag Parks**

which include **Alexandra Park** and **Finsbury Park**

There is, however, substantial variation in the amount of open space in different wards.



Economy

The COVID-19 crisis has had severe economic impacts on the borough and its residents

Haringey's economy has been highly exposed due to high numbers of employees in sectors adversely affected by social distancing.

AS OF JUNE 2020

50,400

employees living in Haringey had been furloughed and

19,400

new residents were claiming unemployment benefits

up to 1/3

of all jobs are at risk based on furlough data

IN 2017 HARINGEY HAD

92,000 JOBS

below that of statistical neighbours and London averages

HARINGEY HAS

4TH lowest jobs density of the 32 London boroughs



More than three-quarters of Haringey's working age population were economically active before COVID-19

Until the onset of COVID-19 the borough had a relatively strong labour market, with high levels of participation, low levels of unemployment and strong skills levels

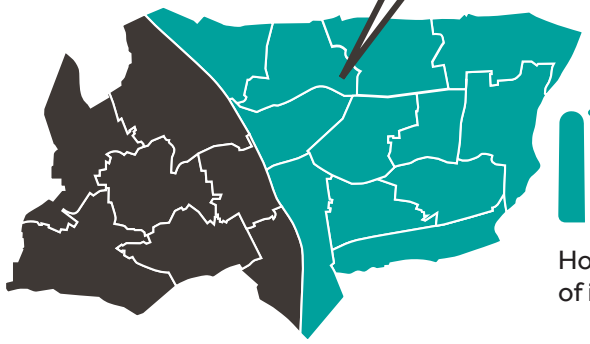
However, rates of economic participation are not equal

HARINGEY WORKERS AND RESIDENTS TEND TO EARN LESS THAN THE LONDON AVERAGE

£ HARINGEY £ LONDON

The proportion of residents earning below the London Living Wage is higher

In-work poverty is an issue for some residents. There are significant differences in average income levels between the east and west of the borough.





Haringey has a high net-outflow of commuters, particularly into Central London

Haringey has a strong local service offering. Key sectors are public services, retail, arts and entertainment and accommodation and food.

Industrial estates are the most significant employment location in the borough and accommodate some of the largest employers. There is a high concentration in the east of the borough.

Tottenham is one of only six London areas to be designated a Creative Enterprise Zone.

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

Challenges and Opportunities

The New Local Plan will cover the period 2022 to 2037. In developing a strategy to guide change and development during this time, we need to respond to the social, environmental and economic challenges that the borough is facing and the opportunities available to address them. The key challenges/opportunities are cross-cutting and include the following:

Reducing inequality and making Haringey a fairer place



There is an extremely wide variation in outcomes across the borough. This inequality is a root cause of many problems. It is essential that equality of opportunity, fairness and quality of life for all is at the forefront of the future action and change in Haringey.

Housing Haringey's people



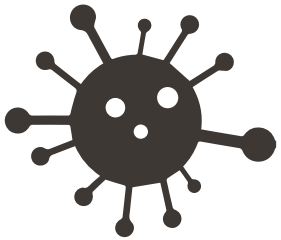
There is substantial need for housing of all types in Haringey. There is a particular need for genuinely affordable housing as high house prices mean that home ownership is out of reach for many existing residents and rising rent costs mean an increasing number of households cannot afford their current accommodation.

Helping prevent Climate Change and address potential effects



Climate change will affect all our lives and those of future generations, with global changes having local impacts. The Council declared a Climate Emergency in 2019. Action is needed to reduce Haringey's carbon emissions as far and as quickly as possible and to deal with the effects of climate change in the borough including heat waves, increased flood risk, and impacts on biodiversity, energy and food. It is particularly important because climate change will disproportionately affect those least able to bear it.

Supporting Haringey's recovery and renewal from the effects of COVID-19



The COVID-19 crisis has had an enormous impact on the borough with major social and economic consequences. A concerted effort is required to support recovery and renewal. There is a need to respond to the changes which result from the virus such as changing work and travel patterns including ensuring our employment land and buildings are fit for a post-COVID economy and that our town centres provide the shops and services our residents need.

Building and retaining wealth in Haringey's communities



The Council is committed to a community wealth-building approach which creates an economy that is rooted in the community, with the Council leading by example. A key part of this is ensuring that regeneration delivers social and economic renewal of existing communities and that these continue to be an integral part of the community after work is done.

Creating better places and improved local environments which are attractive, sustainable and safe



New development must be high quality and contribute to a sense of place. It should conserve and enhance the borough's historic environment as well as protect and enhance the natural environment. There is a particular need to support the continued vitality and vibrancy of the borough's centres. New development must also help create and enhance a sense of community fostering cohesion and unity.

Improving facilities and services and accessibility to them



Haringey has a wide variety of services and facilities. It will be necessary to improve these to support the borough's growing population and also to ensure more equitable access (both in terms of location and physical access) for all members of the community to jobs, health, housing, education, shops, leisure and community facilities.

Delivering a transport system which is better connected, has greater capacity and is more accessible



The borough has a good transport system already but this will need to improve in response to growth and to reduce carbon emissions and create an environment which is pleasant to get around by walking cycling and public transport.

Ensuring growth in Haringey benefits everyone and is sustainable



Haringey is required by the new London Plan to accommodate a significant amount of growth, particularly in terms of the delivery of new homes. It is important that this growth is something that everyone in the borough can benefit from and that produces attractive, accessible high-quality buildings, streets, parks and other public spaces.

Supporting active and healthy lifestyles across Haringey



There is an important link between how places are planned and the health of people who live in them. Haringey should be a healthy environment that contributes to the vitality and wellbeing of its communities. It is key that development and change supports a shift towards walking and cycling as the primary transport modes in the borough.



What do you think?

BP1. What challenges/ opportunities does Haringey face now and in the future?

BP2. Have we covered all the overarching challenges/ opportunities facing the borough? Is there anything missing?

3.2. Vision

Haringey will have to accommodate a significant amount of growth to meet our local needs. We need to be realistic that Haringey will change. Our vision should be positive, focusing on what we want to see rather than what we do not. It should provide a clear picture of the role that new development will play in creating the borough we want to see in the future.

We would like your views on how bold and ambitious the New Local Plan should be. A suggested vision is set out on the next page and we would like to know your thoughts on it.

What do you think?

BP3. What should our priorities be in the New Local Plan vision for Haringey and why?

BP4. Will the proposed vision deliver the Haringey you want to see in the future? If not, what changes would you like to see?



Suggested Vision

In **2037** Haringey has a strong track record of addressing our key **challenges**

Inequality

A fairer borough which has significantly reduced inequalities and considerably narrowed the gap in outcomes

Climate Emergency

On target to be a zero-carbon borough by 2041, playing a leading role in taking action to address climate change and developing resilience to its effects

Housing Affordability

Everyone has a safe, stable and affordable home, regardless of their circumstances

Is a **proud** borough where our unique natural, physical and cultural assets have been **enhanced** and are **celebrated**

A network of thriving town centres and high streets which are fit for 21st century needs

Well connected in physical terms and benefitting from a network of connected communities

Has expanded its exciting cultural and creative offer

An environment that has benefited from development of the highest design quality

A leader in adapting to, and adopting, new technologies and innovations that support a sustainable borough

A healthy borough where walking and cycling are the preferred transport modes for local trips

Has an excellent range of services and facilities that are equally accessible to all

A conserved and enhanced historic environment whose value to residents is maximised

Continues to **empower** our diverse and talented people, in particular our children, to live healthy, enriched lives, and achieve their potential

Has a good local economy which provides opportunities for all residents and supports our local businesses to thrive

Has benefitted from the renewal of Wood Green and Tottenham as part of a borough-wide community wealth-building approach that puts local people at the heart of regeneration

People can lead active and healthy lives in an environment that is clean and green and supports communtiy safety and cohesion

3.3. Level of growth

The London Plan sets out a spatial strategy to plan for London's growth between 2019 and 2041. It identifies the overall level of growth that London is expected to accommodate in the first ten years of the plan and Policy H1 apportions annual housing targets to each of the 32 London Boroughs for this period using a capacity-based methodology.

Policy H1 sets Haringey a ten-year minimum housing target of 15,920 homes over the period 2019/20 to 2028/29 (an annual average of 1592 homes). It states that this target must be included in the development plans of boroughs. We therefore propose that the New Local Plan should plan for and seek to ensure the delivery of this target. We still need to find out what specific housing mix is needed in Haringey and will undertake a Strategic Housing Market Assessment to establish what the appropriate mix is, including affordable housing.

The London Plan does not set any borough targets in relation to non-housing uses such as employment and retail. We will commission bespoke evidence to find out what the projected need is for these uses over the plan period.

3.4. Sustainable development

The National Planning Policy Framework (NPPF) (2019) sets out that the purpose of the planning system is to achieve sustainable development At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways. These are an economic objective, a social objective and an environmental objective.

At the heart of the NPPF is a presumption in favour of sustainable development. This means that the New Local Plan should seek opportunities to meet the development needs of our area . We must therefore plan for and new development in the future but this has to be achieved in a sustainable way, and this is the starting point for the New Local Plan.

What do you think?

BP5. Do you consider that planning for the level of housing growth required by the London Plan is the appropriate approach in the New Local Plan?

BP6. If you do not agree, please tell us how we should decide what level of growth to plan for and why?

3.5. Good growth

Dealing with high levels of growth is undoubtedly one of the biggest challenges of our times, putting pressure on land, housing, infrastructure and the environment. The London Plan is clear that growth should not be supported at any cost and instead stresses that boroughs should achieve "good growth" – growth that is socially and economically sustainable and is focused on sustainable development.

In this regard, the London Plan sets out six core good growth objectives which should be taken into account for all planning and development in London. They are as follows:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

We broadly support these objectives and do not propose to repeat them in the New Local Plan as the London Plan already forms part of the development plan for our borough. We do however consider that there may be merit in including specific good growth objectives for Haringey within the New Local Plan. These would provide further detail about what good growth means in a Haringey context including:

- The affordable housing needs of residents of the borough
- The best use of land having regard to the varied character of the borough
- Local interpretation of high-quality design
- Our definition of a good economy
- The needs of our town centres and high streets
- Reducing carbon emissions and mitigating climate change

What do you think?

BP7. Do you support the London Plan Good Growth objectives? If not, why?

BP8. Do you consider that there is a need for specific Good growth objectives for Haringey within the New Local Plan?

BP9. If so, what do you think these Good Growth objectives should be?



4. Our Neighbourhoods

The borough comprises a series of places, at a variety of scales, each with different issues, challenges, and opportunities. This section considers our borough's places and seeks your input as to how they can best be addressed within the New Local Plan.



4.1. Opportunity Areas and Regeneration

The London Plan identifies two Opportunity Areas in Haringey. These are at Wood Green (referred to as Haringey Heartlands), and the Lee Valley which includes Tottenham Hale. These areas have the potential to deliver a substantial amount of the new homes and jobs that Haringey and London needs. They are the areas of the borough which are expected to see the most change.

Tottenham and Wood Green are also identified in our Borough Plan as focuses for regeneration with social and economic renewal at its heart. Our objective is to deliver new homes and jobs in these locations for the benefit of the existing communities. We will seek to maximise benefits for local residents and businesses and deliver new investment and improvements as set out in their Strategic Regeneration Frameworks, including to public spaces and community facilities.

Coordinated development in Opportunity and Regeneration Areas and on key sites provides opportunities for developments to deliver greater benefits than the sum of their individual parts. To ensure maximum delivery and benefits for residents and businesses, and to avoid piecemeal development, the New Local Plan will look to require comprehensive masterplanning and site assembly in these areas where appropriate.

Lee Valley Opportunity Area

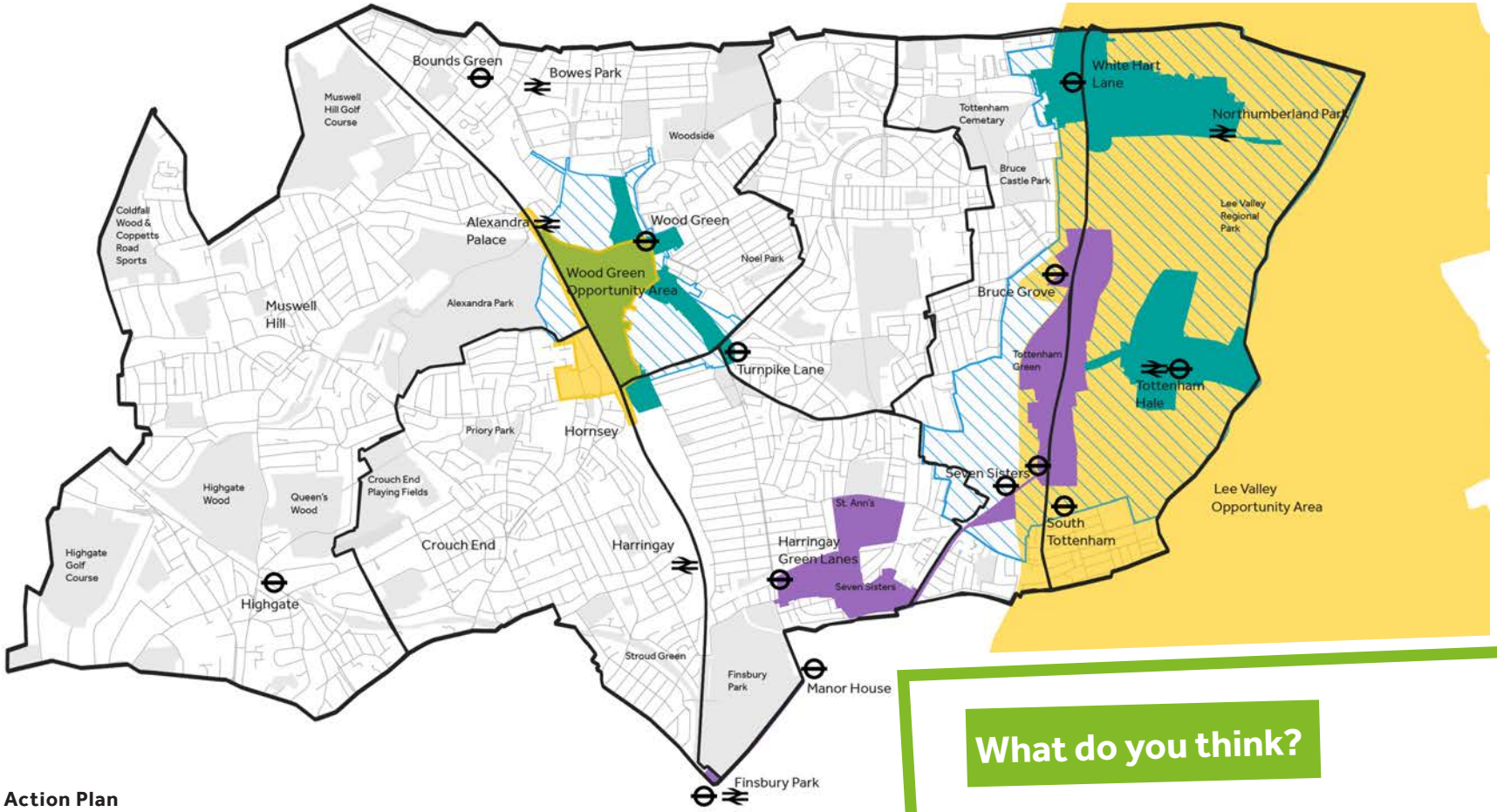
The Lee Valley occupies a strategic position in the London-Stansted-Cambridge-Peterborough growth corridor and provides a range of opportunities for higher density development. Within Haringey this is predominantly in the Tottenham Hale and North Tottenham area, with major schemes in Tottenham Hale already on-site and the Tottenham Hotspur Stadium and associated development substantially built. The potential arrival of Crossrail 2 will transform transport connectivity and capacity in the Upper Lee Valley to support this additional growth, with recent improvements including a four-trains-per-hour service on the West Anglia Main Line at Northumberland Park.

The London Plan identifies that this Opportunity Area has the capacity for around 21,000 new homes and 13,000 new jobs, of which 10,000 new homes and 5,000 new jobs are currently planned for within Haringey, as identified in the Tottenham Area Action Plan (AAP). A large number of the major development sites within the Tottenham AAP have been completed, are substantially underway or now have planning permission. We are therefore proposing to incorporate the remaining sites in the Opportunity Area within the New Local Plan.

Wood Green / Haringey Heartlands Opportunity Area

Wood Green is identified as an Opportunity Area in the London Plan due to the range of sites suitable for redevelopment to support a rejuvenated employment-led Metropolitan town centre. The area benefits from excellent public transport connections, and subject to confirmation of Crossrail 2 coming to the area, these will be further improved, making it an ideal location for growth in employment and service provision to serve the central portion of Haringey and the wider region. The London Plan and the AAP identifies that the area has the capacity for around 4,500 new homes and 2,500 new jobs.

Due to the extent of redevelopment planned, with many sites expected to come forward in the near future, we decided a number of years ago it would be appropriate to prepare a separate planning policy document to help manage and direct change in Wood Green. The emerging Wood Green Area Action Plan (AAP), which was last consulted on in March 2018, details the key sites and aspirations for redevelopment within the Wood Green Opportunity Area.



KEY

Area Action Plan
1 Wood Green
2 Tottenham

Opportunity Area
1 Wood Green/Haringey Heartlands
2 Lee Valley

Area of Change
1 Tottenham High Road
2 Seven Sisters
3 Finsbury Park

Growth Area
1 Wood Green
2 Northumberland Park
3 Tottenham Hale

Other
Green space

What do you think?

N1. Should the Council continue to require a comprehensive approach to development of key site allocations and other regeneration opportunities including masterplanning and site acquisition where appropriate? Or should each site only be looked at individually?

4.2. Town centres and high streets

The changing nature of Town Centres

For most of the recent past, town centres have been primarily focused around retail. However, as with other centres across the UK, our centres face major competition from online shopping. As shopping habits change retailers are increasingly looking to concentrate their stores in a smaller number of larger centres with larger department stores struggling to compete. Some of these changes have been further accelerated by the COVID-19 pandemic. There has however been a trend towards more local shopping during the pandemic which could be a key future opportunity for the town centres and high streets in the borough provided they deliver the right offer.

In the future, successful centres will need to move beyond a reliance on retail and provide a more diverse set of activities to encourage visitors. Our centres have already begun to successfully shift their focus beyond retail but this will need to expand further in the future to ensure they remain thriving places. Each centre will need to find the right balance between retail, employment, leisure, hospitality, community and cultural uses. Allowing more homes to be built in and around town centres can also help support them by bringing in more local footfall.

It is important to note that the Government has significantly changed the 'Use Classes Order' and increased permitted development rights that apply to common town centre uses such as shops, cafes, restaurants and offices. This means they can change to a variety of other uses without planning permission, or subject to limited assessment through a process called 'prior approval'. The effect of this is that our ability to control the mix of uses is substantially more limited than it was in the past.

Town centres and high streets are particularly complex areas to plan for. They cut across the Borough Plan priorities and require the balancing of many different planning and non-planning issues. Making them successful places requires close collaboration between the local community, business, property and landowners, the Council, and a range of other key stakeholders.

Today our town centres and high streets face many challenges and the New Local Plan will need to take a positive approach to their management and adaptation, maximising available opportunities. In doing so it will need to:

- Define the network and hierarchy of town centres and their extent
- Set policies for land use and development in the centres and the edge of centres
- Allocate suitable sites to accommodate new development and infrastructure that is needed such as civic, cultural, community and leisure facilities

Haringey's Town Centres and High Streets

Wood Green, Muswell Hill, Crouch End, Tottenham High Road/Bruce Grove, Green Lanes, and West Green Road/Seven Sisters Road are the main shopping centres within Haringey, with Stroud Green forming part of the Finsbury Park shopping area which straddles the border with Islington and Hackney. These centres are supported by Tottenham Hale Retail Park, which is part of a future District Centre at Tottenham Hale associated with redevelopment there.

The London Plan sets out a hierarchy of town centres based on their role and function.

Wood Green Metropolitan Centre is one of 13 Metropolitan Centres across London, and is the largest centre in the borough, and serves a wider catchment which extends over several boroughs. It contains over 100,000 square metres of retail, leisure and service floorspace. It has very good accessibility and significant employment, service and leisure functions including two cinemas.

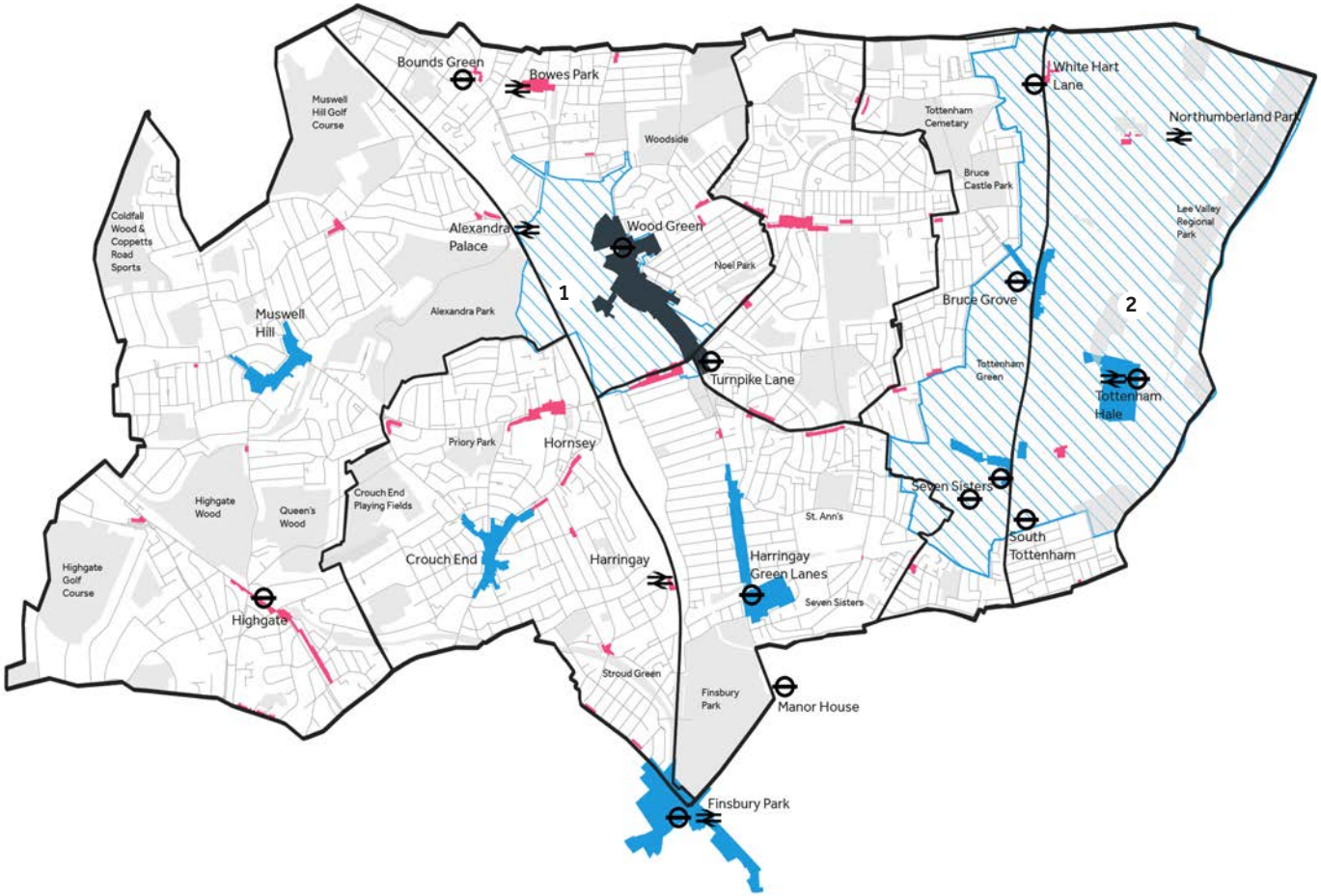
The remaining town centres listed above are all classified as District Centres and provide a range of shops, restaurants and service, including employment space, and attract people from a moderate distance. Some of them have developed specialist shopping functions, such as Green Lanes which has a unique Turkish food offering.

In addition to these larger shopping centres, there are 38 local shopping centres in the borough which provide a varying range of functions from small parades with essential services, to significant stretches of high street with a wider range of shops and services such as Myddleton Road centre and Highgate High Street which stretches into Camden. Many of these smaller centres contain independent businesses and important local community facilities.

Existing Local Plan Policy

The existing Local Plan sets out a hierarchy of centres in the borough. Policy directs development to our centres consistent with their size, role and function and catchment. We currently have a town centre first emphasis and discourage out of centre retail development except where there is evidence of a specific need.

The existing Local Plan helps ensure there is sufficient core retailing space and that centres remain viable and vibrant by designating shopping frontages and controlling changes of use within these. Primary retail frontage is typically designated in the heart of a centre where there is a key cluster of shopping uses, and secondary frontages are on the edges of centres where there is more of a mix of retail, and cafe, restaurant and other uses. Existing Local Plan policies resist loss of retail floorspace in primary shopping frontages to no more than 35% in non-retail use and allows for some more flexibility within secondary frontages and local centres to allow for up to 50% in non-retail use. With regards to primary frontages, with the exception of Wood Green, most centres in Haringey are at or just below this threshold. Recent national changes to the Use Classes Order mean that changes of use between retail and other commercial and business uses may not need planning permission and so the New Local Plan policies may not be able to support or discourage certain changes of use.









KEY

Metropolitan centre - serve wide catchments which can extend over several boroughs and into parts of the Wider South East. They have significant employment, service and leisure functions and generally offer a relatively high proportion of comparison goods relative to convenience goods

District centre - provide largely convenience goods and services, and social infrastructure for more local communities. Some District centres have developed specialist shopping functions

Local shopping area - serve local neighbourhoods catchments and provide for the day-to-day needs of people living, working and staying nearby

Other

Green space - All vegetated open space of public value (whether publicly or privately owned), including parks, woodlands, nature reserves, gardens and sports fields, which offer opportunities for sport and recreation, wildlife conservation and other benefits such as storing flood water, and can provide an important visual amenity in the urban landscape

Challenges and Opportunities

Preserve space for key activities while allowing for flexible use



The New Local Plan will need to consider whether we have set aside the right amount of space for retail activities in appropriate locations, while still encouraging other activities, and allowing for some flexibility as the way we use our centres continues to change.

Enhance safety



We want our town centres to be spaces for everyone in the community. Recent surveys suggest that improved safety was the thing Haringey residents and workers felt would make the biggest different in encouraging them to visit their town centre more often. There are a number of ways in which the New Local Plan policies could assist in this way, for example by requiring new developments to support crime prevention through urban design principles, improved public realm lighting and through close collaboration with local businesses and the police.

Create healthy environments



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

Create inclusive centres



Having an inclusive town centre, means being easily accessible to people of all levels of mobility. Having places for people to sit and relax, and for children to play is important for people's physical and mental wellbeing and means that town centres are not just spaces reserved for those who have money to spend.

Enhance and celebrate our unique character



Town centres are places where a neighbourhood's character and identity are shaped. They contain our local historic buildings and landmarks and house our popular restaurants, shops, markets, and festivals. These unique characteristics help create a strong community identity as well as allow our centres to stand out when competing with centres in neighbouring boroughs.

The New Local Plan will need to create policies that encourage new development to protect, embrace and enhance our local attributes while allowing enough flexibility for our centres' character to develop positively over time.

Gathering evidence

Our existing Retail and Town Centres Study, which was completed in 2013, assessed town centre boundaries, frontages and the need for additional floorspace. Due to the COVID-19 pandemic, it is a difficult time to predict future needs. However, we intend to update our retail and town centres evidence base to inform the New Local Plan. This will help us find out how much floorspace we need for a range of town centres uses and determine whether the extent of our existing town centres is appropriate.

What do you think?

N2. What do you think are the key issues and challenges our town centres face and how should the New Local Plan address them?

Things to consider

How do you currently use Haringey's town centres and what activities would you like to use them in for the future?

How do you think the Council should respond to major changes to the Use Classes Order which mean that a range of commercial uses in town centres (e.g. shops, café, restaurants and offices) can change to other commercial uses without the need for planning permission?

Should we be allowing more non-retail use in town centres, if so, what?

Are some of our town centres too large and need to be made smaller to free up land and buildings for other uses? Which ones?

Are some too small and require greater opportunity for commercial space to expand their offering?

What are the attributes of Haringey's different town centres that make them special and should be protected and/ or enhanced?

Are there things that currently discourage you from visiting our town centres and if so what should be done to improve it?

4.3. Neighbourhood planning

Neighbourhood Planning allows communities to influence the development and growth of their local area through the production of a neighbourhood development plan, a neighbourhood development order or a community right to build order.

Neighbourhood planning is led by 'neighbourhood forums' who with support from the Council are able to designate a 'neighbourhood area' within which to focus their plan or proposals.

To date there are three Neighbourhood Forums with designated areas. These are in Highgate, Crouch End, and Finsbury Park/Stroud Green. Only one has an adopted Neighbourhood Plan – Highgate, which is used to help determine planning applications within that area.

The NPPF sets out that neighbourhood plans must be in general conformity with the strategic policies contained in the Development Plan for the area. They should support the delivery of strategic policies and should shape and direct development that is outside of these strategic policies.

Strategic policies are those which set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing, employment, and other development, infrastructure, community facilities and conservation of the natural, built and historic environment. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.

As the New Local Plan progresses, adopted neighbourhood plans may need to be reviewed to bring them in line with the strategic policies of the emerging Plan. As part of the process of preparing the New Local Plan, we will have discussions with each neighbourhood forum to agree if changes are considered likely to be necessary and how the Local Plan could support neighbourhood plans.

We encourage neighbourhoods to engage in the Local Plan process as it can often achieve similar outcomes as might be sought in a neighbourhood plan.

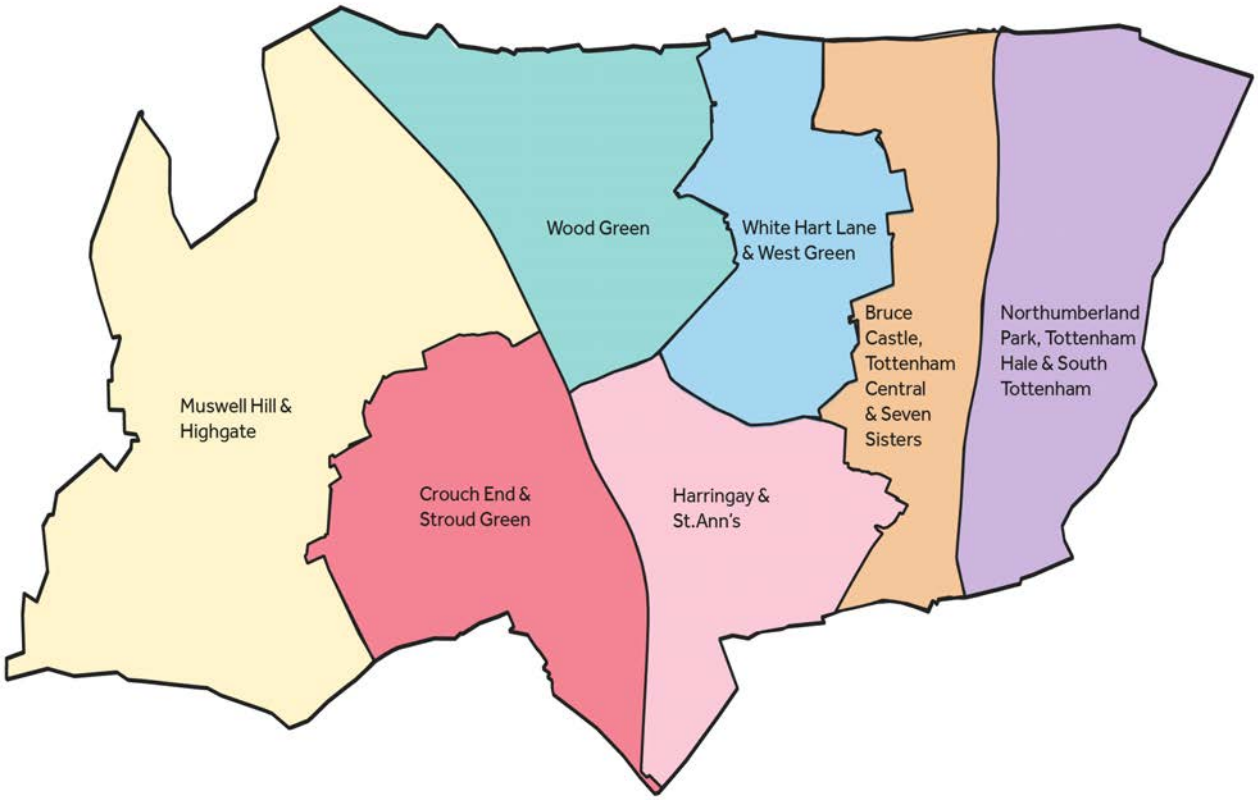
What do you think?

N3. Which policies in the New Local Plan do you think are strategic policies and therefore will be policies that Neighbourhood Plans should be in general conformity with?

4.4. Areas

The New Local Plan will respond to local needs and it is therefore appropriate to consider the issues, challenges and opportunities of the different areas within the borough.

The existing Local Plan divides the borough up into seven areas based upon current ward boundaries. However, following the completion of an Electoral Review in late 2019, the future electoral arrangements in Haringey are set to change. The number of wards in the borough will increase from 19 to 21 and there will be changes to the boundaries of most wards. As the ward boundary changes will come into effect before the New Local Plan is adopted, we propose to base the areas in the New Local Plan on the new ward boundaries. The below sections identify 7 areas in the borough and set out a snapshot of each together with key opportunities.

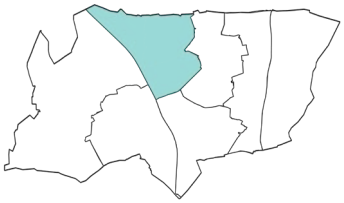


4.5. Area 1: Wood Green

This area covers the central northern portion of the borough and includes Wood Green Metropolitan Centre. Significant redevelopment and growth is planned for Wood Green, particularly along the High Road, Turnpike Lane and within the Cultural Quarter. This area is partially covered by the emerging Wood Green Area Action Plan, which covers the western half of Noel Park Ward including all of Wood Green Town Centre, and the south western corner of Woodside Ward from the Civic Centre heading south. The emerging Area Action Plan contains additional site allocations and policies to manage growth within this area and can be viewed on our website. For clarity, policies within the New Local Plan will also apply to the Wood Green AAP area.



KEY



Town Centre and Growth
- Metropolitan centre
- Local shopping centre
- Wood Green AAP
- Site Allocations

Heritage and Conservation
- Statutory Listed Buildings
- Conservation Areas

Employment Land
- Local Employment Land (DM37)
- Local Empoyment Area - Regeneration (DM37)

Other
- Green space
- Cultural Quarter



Housing

Key Characteristics

The large Noel Park Estate lies immediately to the east of the High Road. It was built in the late 19th century and forms a distinctive part of this area, having been designated as a Conservation Area. Victorian housing in the form of terraces and villas is the predominant existing housing stock across Noel Park and Woodside except the north western end of Bounds Green where interwar housing on larger plots is prevalent. There has been limited new development within Bounds Green and Woodside Wards in recent years. The central part of this area will likely house a significant proportion of new development in coming years and these sites are included in the emerging Wood Green AAP.

Opportunities

- Sites with capacity for around 6,000 homes, some of which are now under construction. The Wood Green AAP identifies significant opportunities for new housing within the part of this area it covers. Outside of this, there are still significant opportunities to be realised as set out below
- Potential for intensification of a number of blocks in Woodside and Bounds Green, particularly with frontages onto main streets where apartment building typology may be more suitable
- A number of housing estates could be improved by reconnecting them better into the surrounding street network, enhancing wayfinding through the estates and infill and intensification opportunities
- Opportunity for smaller infill developments that complement the predominant low-rise urban terrace character

People

Key Characteristics

This area is home to many talented young people and many enterprising business owners. The area's population is very diverse with significant Turkish and other European and Middle Eastern communities. Given the urban nature of the central part of this area there are a higher than average number of one person households, with family housing to the north and east of the area. There are higher levels of crime and deprivation in parts of Noel Park and Woodside than the borough average.

Opportunities

- Improved community facilities in accessible locations, and greater safety through redevelopment of existing sites
- New Civic hub and new library to serve the local community, as well as opportunities for new youth facilities in the area
- Revitalised Metropolitan Centre with better public realm and connectivity

Place

Key Characteristics

This area has both inner and outer London characteristics and qualities. It is bounded by the railway line to the west with views up to Alexandra Palace, Noel Park Estate to the east, the Civic Centre to the north and Turnpike Lane to the South.

Wood Green town centre is the focal point of this area and is characterised by its strategic location along the busy High Road, (A105). The High Road is lined, largely by 3 storey mixed use buildings and stretches for some 900 metres, with ground floor shops, local businesses, cinemas, bars, cafes and restaurants. The Mall is a significant and complex building that straddles both sides of the High Road joined by a distinctive footbridge overhead.

At either end of this section of the High Road are two historic Commons which today provide important green lungs and places of respite off the busy and hectic High Road. To the north lies Wood Green Common, and to the south lies Ducketts Common. Beyond this there are a number of local town centres and predominantly residential suburban housing.

In the east of the area is the popular New River sports complex in Woodside Ward which is an important and well used leisure venue for the whole borough, and includes an athletics track and stand, indoor tennis facilities, and extensive third generation artificial playing pitches.

The area as a whole is well served by public transport, and there are stops on the Piccadilly line at Turnpike Lane, Wood Green and Bounds Green. National rail services stop at Alexandra Palace station and Hornsey on the western edges of this area and Bowes Park to the north. There is a proposal for Crossrail 2 to come through the area, with the Council's preferred location for a station being within Wood Green town centre. However, the existing railway acts as a barrier restricting access to Alexandra Palace and the west of the borough and in general there are poor east west transport connections.

The Council has commissioned a Wood Green Design Manual and Character Study to support the delivery of an improved local environment through new development.

Opportunities

- Significant redevelopment opportunities exist within the central part of this area
- Opportunity for new leisure and cultural provision within this area, to be made more competitive by the potential arrival of Crossrail 2.
- Potential for a new Leisure Centre within Wood Green and additional health care facilities
- Major redevelopment opportunities along High Road and Station Road, including on the Library site and River Park House which are both owned by the Council, which will provide opportunities for new office space for the Council, alongside potential leisure and improved library facilities
- Improve east west connectivity, particularly to Alexandra Palace
- Improve access to parks and new river connections and improve spaces (better quality and maintenance)
- Enhancement of local centres through community led plans, e.g. Turnpike Lane and Myddleton Road
- Improve safety and security through redevelopment

Economy

Key Characteristics

The Wood Green Employment and Economy Space Study provides a detailed assessment of the area's economy. The area has a strong existing creative economy that the Council is seeking to preserve and enhance. There is a particularly visible and active arts, creative and small business community west of the High Road and south of Wood Green Common, in an area now known as the Cultural Quarter, and large redevelopments are underway, particularly on the former gas holdings site. Details of these are in the emerging Wood Green Area Action Plan.

The High Road, through Wood Green and along Turnpike Lane, forms the focal shopping destination in the borough, and contains two major cinemas, large floorplate retailers and a number of independent shops. There are large national retailers in the Mall, but along the High Road there has been a trend, exacerbated by COVID-19, of those types of retailers leaving Wood Green. The renewal of the High Road will re-attract such retailers and/or will reposition the High Road to have a broader appeal than simply shopping. The area also has a reasonable office market and is home to Haringey Council offices and Civic Centre. In light of ageing accommodation and changing workspace requirements from COVID-19, the Council is considering its office and civic accommodation options in Wood Green which will need to be reflected in the New Local Plan to better serve residents.

The area contains Bounds Green Industrial Estate, an important local employment area, and also the Wood Green employment area, which is subject to regeneration as part of the emerging cultural quarter.

Within Wood Green Metropolitan Centre there are significant redevelopment opportunities, including recently granted major planning permissions at the former BHS and M&S stores for new retail and employment space with homes above, and wholesale change at Haringey Heartlands including redevelopment of the former Clarendon Gasworks site and the Chocolate Factory within the emerging Cultural Quarter.

Opportunities

- Sites with capacity for around 4,000 new jobs
- New creative industries and flexible workspace through significant redevelopment within Wood Green, including co-location with residential uses as part of mixed-use development
- Potential for additional employment and retail development within Wood Green Metropolitan Centre through major redevelopment as well as to develop the evening economy further
- More limited improvements and consolidation at other local centres, notably Bounds Green and Turnpike Lane

Please see the emerging Wood Green Area Action Plan for further details about draft policies and site-specific proposals within the AAP area.

What do you think?

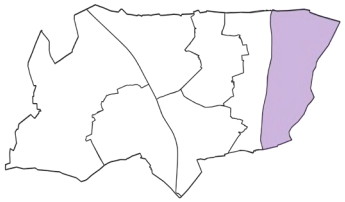
N4. Do you agree with the challenges/opportunities that have been identified for Wood Green that have been identified? Why/ why not?

N5. Are there any additional challenges/opportunities that the New Local Plan can help address and how?

N6. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

4.6. Area 2: Northumberland Park, Tottenham Hale and South Tottenham

This area sits between the historically and culturally rich Tottenham High Road and the ecologically significant open spaces of the Lee Valley Regional Park. It also contains the majority of the borough's strategic employment land. Recent growth has unlocked opportunities to benefit from this strategic location, improve connectivity, and provide more affordable homes, jobs, and infrastructure to support local communities, particularly young people, in reaching their potential.



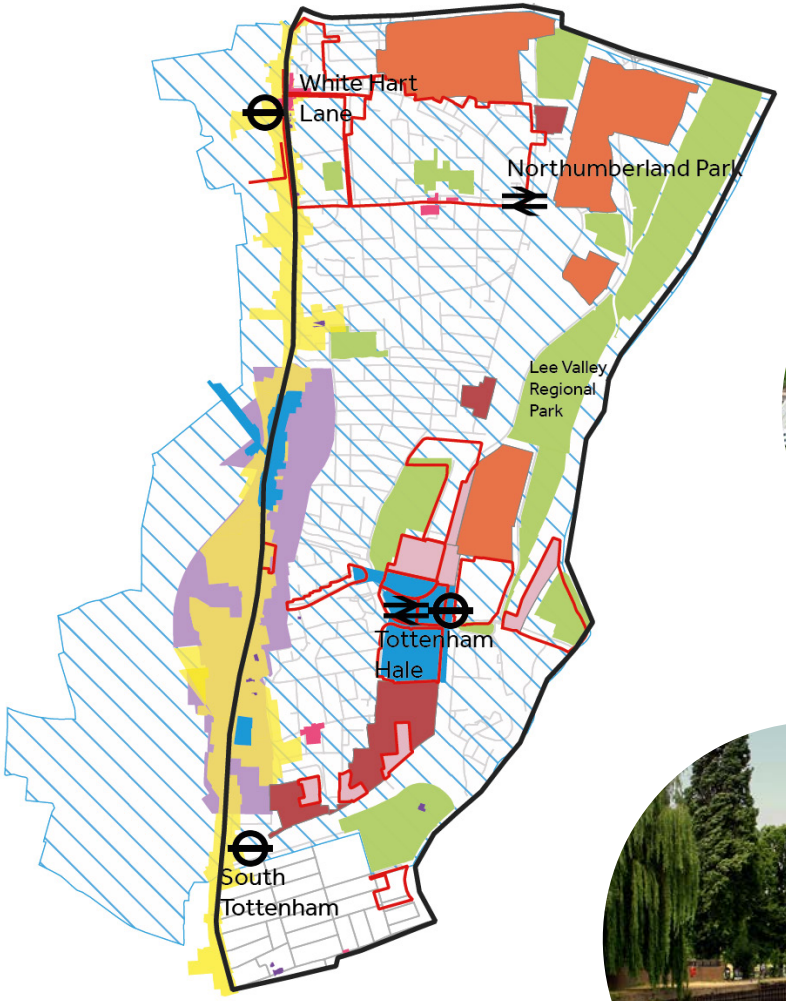
KEY

Town Centre and Growth
- District centre
- Local shopping centre
- Tottenham AAP
- Area of Change
- Site Allocation

Heritage and Conservation
- Statutory Listed Buildings
- Conservation Areas

Employment Land
- Strategic Industrial Land
- Locally Significant Employment Site (LSIS)
- Local Employment Land (DM37)
- Local Empoyment Area - Regeneration (DM37)

Other
- Green space







Housing

Key Characteristics

There is a diverse range of housing types from the terraced housing west of Park View Road to 1960/70s housing estates like Chestnut Estate and the high-rise apartments of Hale Village. Northumberland Park contains a large proportion of social housing. There are issues with overcrowding in this part of the borough and need for family housing is high.

Tottenham Hale was awarded Housing Zone status in 2015 and is experiencing the development of a large number of new homes, with 5,000 units currently consented or under construction guided by the Tottenham Hale Strategic Regeneration Framework and the Tottenham Hale District Centre Framework. This includes the creation of 131 council owned homes (51 of which will be social rent) at the Welbourne Centre site, through a development partnership between the Council and Argent Related.

As previously identified development opportunities are being completed, a key challenge will be to identify new opportunities for additional homes.

Opportunities

- Support the creation of a range of affordable housing tenures and types but with opportunities for more mixed communities in some locations
- Support the conversion of Houses in Multiple Occupation (HMOs) and small flats back into family houses which are in strong demand
- Work with local communities to consider options for regenerating the Council's housing estates. The Council's land portfolio includes development at low densities, underutilised land, and opportunities to improve ground frontages, which could support an intensification of housing and enable the creation of more affordable homes for local residents
- Further support the creation of a vibrant mixed-use heart for the Hale around Tottenham Hale Station by delivering additional new affordable homes

People

Key Characteristics

This area is home to Ada, the National College for Digital Skills, a specialist college teaching a wide range of digital skills. Tottenham Hale has and continues to see significant investment in community infrastructure including The Engine Room in Hale Village, Harris Academy, and plans for a large new health centre at the corner of Monument Way, Chestnut Road and Park View Road. This investment is needed to support a growing population and help address educational achievement and health outcomes in the community.

In Northumberland Park, the new Tottenham Hotspur Stadium and associated development anchors what is becoming a premier sports and leisure destination and a local community hub, with a new supermarket, community health centre and educational establishments.

South Tottenham, together with parts of Hackney forms part of one of the largest Charedi Orthodox Jewish communities in the world (outside of New York and Israel), centred around Stamford Hill.

Opportunities

- Build on the work of excellent schools and colleges in the area by identifying sites for new educational facilities and opportunities for shared facilities
- Continue to support the provision of new and enhanced social infrastructure to enable residents to access the right support, training and education to improve their outcomes, health and wellbeing to meet the needs of an expanding population
- Further develop the role of local centres as community hubs and in serving the needs of residents

Place

Key Characteristics

This area contains part of the Lee Valley Regional Park an ecologically rich area designated as Green Belt, which has an abundance of bird life. In recent years access to this natural asset from the nearby urban areas has improved substantially including the opening of Walthamstow Wetlands to the public.

The area contains several significant open space assets including Markfield Park and Down Lane Park but there is an overall lack of access to usable open space.

The new Tottenham Hotspur Stadium is a key landmark for the area and establishes a precedent for high quality buildings which complement the historic setting of the High Road.

Recent improvements to the public transport network include upgrades to the Northumberland Park and Tottenham Hale Stations, increased frequency and reliability, three tracking of the West Anglia Main Line, and electrification of the Barking Gospel line. Although the funding remains uncertain, Crossrail 2 would deliver significantly improved links to north east and south east London, with one of the route options running through both stations. Rail connectivity has further improved with the 2019 opening of the Meridian Water station, just north of the borough boundary in Enfield.

The area contains a high proportion of the borough's industrial land. A number of the estates contain poor quality buildings or otherwise a low quality environment which would benefit from improvements facilitated by new development.

Opportunities

- Continue improving the quality of green spaces and enhance the biodiversity of Lee Valley Regional Park and unused railway land
- Support the delivery of green links through Tottenham to enhance access to opens spaces and nature
- Embrace the waterside/Lee Valley location of North Tottenham building on the development of Meridian Water
- Review the boundaries of designated areas of Green Belt to assess whether they remain appropriate in line with national planning policy and the London Plan
- Ensure that new development supports the creation of a more walkable and cycle friendly streetscape and layout
- Investigate and maximise opportunities to improve safe access across busy roads, railway lines and canals
- Bring out and reconnect to the lost history of the area - using heritage trials, signage, educational material and references in new development
- Improve the quality of the area's industrial estates and their attractiveness and general environment

Economy

Key Characteristics

Northumberland Park, Tottenham Hale and South Tottenham contain a large proportion of the borough's industrial sites and employment areas. These include Millmead and Lockwood industrial estates by Watermead Way, areas alongside the Lee Valley, around Brantwood Road/ Garmin Road, and the South Tottenham Employment Area to the south east of Broad Lane.. The industrial estates in this area contain some of the borough's largest companies and important sectors and are a major source of jobs and opportunities for local people. There continues to be strong demand for industrial spaces which has led to rising rental values.

Proposals to create a new District Centre at Tottenham Hale are underway, as designated in the Tottenham AAP (2017). The framework covers the large floorspace retail of the Tottenham Retail Park as well as the Station. A number of major developments underway on Ashley Road and around the station area will support the creation of this new centre, and further work should be undertaken to help ensure the success of the centre as a business hub and support further improvements to its accessibility.

The West Green Road/Seven Sisters District Centre is home to the Seven Sisters Market. There is a need to address congestion in the area which is a particular problem in the centre and provide for more evening economy uses and community space.

The Seven Sisters and South Tottenham areas have the largest amount of active businesses in the borough. All three wards have experienced emerging clusters of new creatives business, as well as a large cluster of finance and professional business services focused in South Tottenham. South Tottenham has been designated as a Creative Enterprise Zone (CEZ) reflecting its strong creative economy.

The new Tottenham Hotspur Stadium is a key economic driver for this area of the borough.

Opportunities

- Support the development of a distinctive, vibrant and accessible future Tottenham Hale District Centre at the heart of the regeneration of Tottenham Hale
- Guide the mixed-use development of major future development opportunities including Tottenham Hale Retail Park to provide a diverse range of activities with high quality public spaces and a legible streetscape that will attract visitors
- Intensify and more efficiently use industrial land and estates and make these areas function better for businesses and create more attractive environments for those who work there and live in the surrounding areas
- Support the continued protection and enhancement of employment land around South Tottenham and Tottenham Hale and encourage the development of creative industries and finance and professional business service hubs
- Encourage the development of creative industries, for example through the promotion of warehouse living in appropriate locations
- Investments, such as the stadium, and wider growth and regeneration provides an opportunity to bring more jobs and employment to the area for Haringey residents, and opportunities for local business to benefit from match day revenue

What do you think?

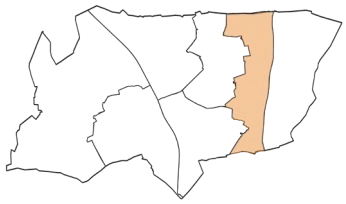
N7. Do you agree with the challenges/ opportunities that have been identified for Northumberland Park, Tottenham Hale and South Tottenham? Why/ why not?

N8. Are there any additional challenges/ opportunities that the New Local Plan can help address and how?

N9. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

4.7. Area 3: Bruce Castle, Tottenham Central and Seven Sisters

Future growth and development in this area provides opportunities to embrace and enhance its wealth of heritage, characterful high streets and town centres, high quality open spaces and vibrant local communities.



KEY

Town Centre and Growth
- District centre
- Local shopping centre
- Tottenham AAP
- Area of Change
- Site Allocation

Heritage and Conservation
- Statutory Listed Buildings
- Conservation Areas

Employment Land
- Strategic Industrial Land
- Locally Significant Employment Site (LSIS)
- Local Employment Land (DM37)
- Local Empoyment Area - Regeneration (DM37)

Other
- Green space



Housing

Key Characteristics

There are a mix of housing types, including significant areas of Victorian/Edwardian era urban terraces, with interwar, post-war and more housing development present in the Bruce Castle and Seven Sisters wards and between the High Road and railway line.

Households in these areas are more likely to be social rented and less likely to be owner occupied when compared with the Haringey or London average. There continues to be significant demand for new affordable housing to meet local needs. A key challenge will be to deliver new affordable homes in a way that respects and enhances the significant heritage attributes of the area.

The Council is committed to working in partnership with residents to determine the best approach for the regeneration of key areas. The provision of quality affordable homes and accompanying social infrastructure and public realm improvements at High Road West is a key focus for the Council.

Opportunities

- Increase densities in areas close to the High Road, particularly around District Centres, in a way that is sensitive to local heritage and character
- The High Road West regeneration scheme is an important redevelopment project to create a vibrant and sustainable neighbourhood and a new leisure destination at the heart of Tottenham
- A significant Council land portfolio provides an opportunity for new development to create more affordable homes for local residents for example on the Love Lane Estate
- Continue to work with the local community to investigate options for estate renewal
- Support the provision of a more diverse housing offer, in particular affordable housing

People

Key Characteristics

Tottenham Green serves as the civic and cultural heart of Tottenham, containing local assets such as the Tottenham Leisure Centre, Bernie Grant Arts Centre, College of North East London and Marcus Garvey Library. The Green itself underwent significant improvements in 2014, supporting its ability to host outdoor events like the Tottenham Green Market. The Council is currently working on a second phase of improvements.

Further to the north-west, the Selby Centre plays an important role in local volunteer and community services. Early engagement is occurring on proposals to deliver a new Selby Centre, alongside new sport facilities on Bull Lane Playing Fields and additional council housing in a community led redevelopment.

Opportunities

- Enhance and consolidate Tottenham Green's position as a civic heart by increasing its accessibility, supporting community uses and improving the public realm
- Delivery of a new Selby Centre to provide enhanced social infrastructure for local communities

Place

Key Characteristics

This area contains a large proportion of built heritage in the east of the borough, including local landmarks such Bruce Castle. The bulk of listed buildings are located around High Road and Bruce Grove Road, including the large civic buildings next to Green. This includes key landmarks such as Palace Cathedral and the Holy Trinity Church. The Clyde Circus Conservation Area, to the west, also contributes to the historic character of the area and includes the Seven Sisters/ West Green Road District Centre, with its own distinct local character. Over time many of the area's heritage assets have been neglected and some are in danger of being lost, particularly along the High Road.

The Council has recently been awarded a High Streets Heritage Action Zone grant of over £2 million from Historic England for the Bruce Grove Conservation Area. Together with £2.6m match funding from the Council this will fund:

- Undertaking physical works to buildings, including repair, reinstating lost features, supporting the conversion of historic buildings for new uses and improvement of shared spaces
- Facilitating cultural activities and events celebrating the history of the high street and its importance to local communities over the generations
- Empowering the local communities in decision making and implementation of the agreed works

Tottenham Green and Bruce Castle Park provide high quality open spaces with green flag award status, however, overall there is a lack of access to large green spaces.

Bruce Grove, Seven Sisters and White Hart Lane stations provide a high level of north-south public transport accessibility around the High Road in addition to regular bus routes. An upgrade of White Hart Lane station together with public realm improvements around the station was completed in 2019 and Seven Sisters is identified as a potential Crossrail 2 route.

The Cycle Superhighway 1, completed in 2016, runs north-south past Tottenham Hotspur Stadium via Bruce Castle Park, however beyond this there is limited cycling infrastructure in the area.

Opportunities

- Improve links to Lordship Recreation Ground, Downhills Park, Tottenham Green and Bruce Castle Park
- Improve the layout and urban design of Bruce Grove District Centre to promote better accessibility and land use
- Capitalise on the Cycle Superhighway to create an excellent cycle network
- Enhance the pedestrian experience along High Road and Phillip Lane and reduce existing high levels of traffic and pollution
- Protect views towards local landmarks
- Support heritage-led regeneration by retaining, repairing and reinstating historic shop fronts and facades

Economy

Key Characteristics

The area includes the West Green Road/Seven Sisters and the Bruce Grove District Centres. The High Road provides a key retail spine. To the west are a number of smaller local centres primarily along West Green Road, Lordship Lane and Philip Lane West.

The West Green Road/Seven Sisters District Centre is home to the Seven Sisters Market. There is a need to address congestion in the centre and provide for more evening economy uses and community space.

Our Strategy for Tottenham High Road 2019-2029 identifies a series of visions and aims and objectives for the High Road and its town centres and outlines a range of projects and interventions to respond to the needs of all sectors of the local community, transforming the High Road so that local people can be proud and confident for its future health and sustainability.

Tottenham has been designated as a Creative Enterprise Zone (CEZ) by the GLA reflecting its strong creative economy including a cluster of fashion businesses and small-scale manufacturing.

The area benefits from support from the Tottenham Green Enterprise Centre which provides 1-2-1 advice, training workshops and business incubation.

Opportunities

- Encourage a more diverse retail offer at West Green Road, in particular more evening economy uses and community/ children spaces
- Consolidate and strengthen the role of Bruce Grove as the retail heart of the High Road and support a more diverse offer. There is potential to deliver a greater range of shops to cater to local needs and side roads and alleyways could be enhanced to provide affordable commercial and community space.
- A key opportunity is presented by the £2m High Streets Heritage Action Zone grant the Council recently received which it is match funding with a further £2.6m
- Use urban design principles and collaboration with police and local businesses to help people feel safer in the District Centres
- Encourage new development which enhances the existing character of the West Green Road/Seven Sisters District Centre, improves the public realm, and provides a more diverse retail offer
- Improve branding, gateways and signage of the West Green Road/Seven Sisters District Centre

What do you think?

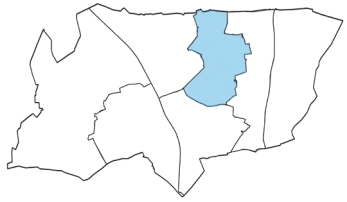
N10. Do you agree with the challenges/ opportunities that have been identified for Bruce Castle, Tottenham Central and Seven Sisters? Why/ why not?

N11. Are there any additional challenges/opportunities that the New Local Plan can help address and how?

N12. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

4.8. Area 4: White Hart Lane and West Green

Largely residential and suburban in nature, there are significant opportunities for future growth and development, and delivery of enhanced connections to the area's high quality large open spaces. Working collaboratively with the local community will be key to improving the provision of quality housing, social infrastructure and employment and training opportunities at the Broadwater Farm estate.



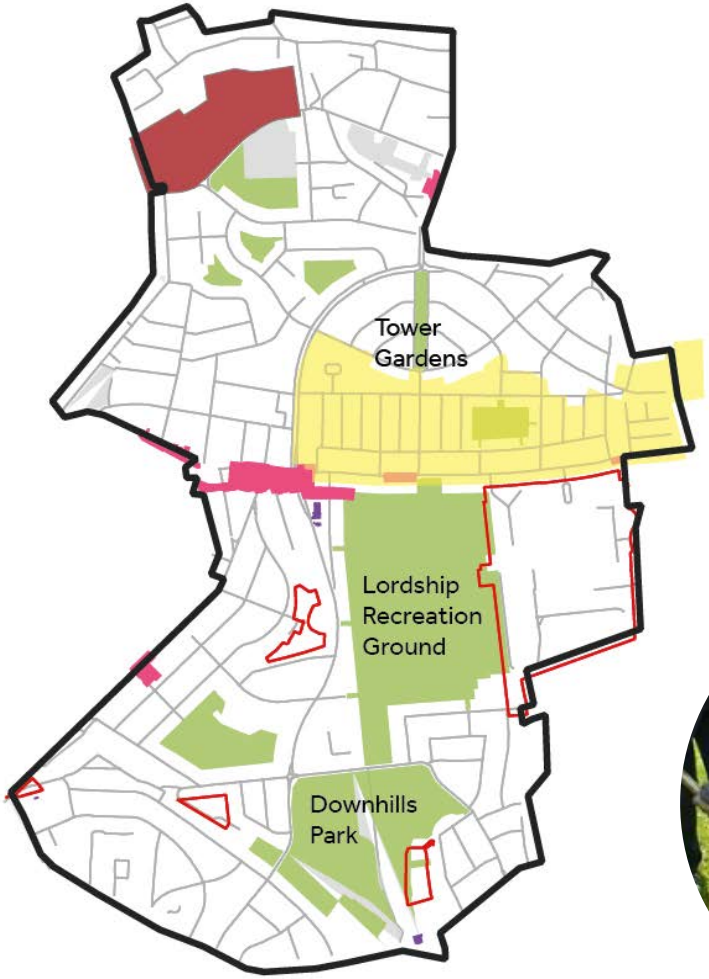
KEY

Town Centre and Growth
- District centre
- Local shopping centre
- Site Allocation

Heritage and Conservation
- Statutory Listed Buildings
- Conservation Areas

Employment Land
- Locally Significant Employment Site (LSIS)

Other
- Green space







Housing

Key Characteristics

White Hart Lane and West Green is largely residential in nature. The predominant style of housing is suburban inter-war terraces and semi-detached homes. Notable exceptions to this are the Broadwater Farm estate and the Tower Gardens and Peabody Cottages Conservation Areas.

The Council is currently working with residents and stakeholders to develop options for new housing and public spaces on the Broadwater Farm Estate as well as improving the existing housing stock creating high quality homes with reduced carbon emissions.

Opportunities

- Work with the community to deliver significant improvement in the quality of housing on the Broadwater Farm estate including refurbishing existing homes to reduce carbon emissions and connect to green energy
- Explore options for delivering an increase in social rented, affordable and other housing on the Tangmere, Northolt and former Moselle school sites
- Identify opportunities and provide guidelines to encourage sensitive suburban intensification to support the provision of new homes

People

Key Characteristics

There are a number of community buildings on Broadwater Farm Estate including an integrated schools campus comprising of a Children's Centre and nursery, primary school and a special needs school, a separate community centre, a health centre and the neighbourhood housing office. Additionally, there are two church facilities and enterprise workshops.

The continued provision of social infrastructure will help address low levels of educational attainment and high levels of deprivation in the area.

Opportunities

- Support the continued development of a range of integrated neighbourhood facilities at Broadwater Farm, where employment, education, leisure, culture and care are all within a short walking/cycling distance for the wider community, bringing everyday necessities closer to people
- Explore opportunities to deliver new community amenities to support a young and growing population

Place

Key Characteristics

West Green benefits from the large central green expanse of Lordship Recreation Ground and Downhills Park, in addition to the Belmont Recreation Ground, all of which have Green Flag Award status. However, in many cases these quality open spaces are not well integrated and connected to the surrounding neighbourhoods and there are further steps that can be taken to improve safety.

Connectivity in this area is relatively poor. There are no railway or underground stations and public transit is reliant on key bus route. The White Hart Lane area has the highest proportion of residents in the borough using a car or van to get to work.

There is potential for improved walking and cycling in the area, capitalising on the large areas of open space, however, a number of barriers remain, in particular difficulties crossing high traffic roads like the A10.

The area contains two conservation areas, Tower Gardens and Peabody Cottages.

Opportunities

- Support the creation of a strategic green link to Finsbury Park
- Improve connection east towards Tottenham Marshes to link into the Lea Valley Regional Park
- Improve links between the Broadwater Farm estate and surrounding areas, particularly access to Downhills Park
- Improve connections between Broadwater Farm and nearby district centres whilst establishing the Community Campus as a destination with a broader local offer
- Consider improved bus routes to Broadwater Farm Estate to enhance connectivity and integrate the housing estate to the wider neighbourhood
- Consider opportunities for improving and enhancing neighbourhood safety so residents feel safe

Economy

Key Characteristics

There are limited employment areas here aside from a Locally Significant Industrial Site north of White Hart Lane and south of Devonshire Hill Lane.

There are a number of small local centres primarily along Lordship Lane, Philip Lane West and Great Cambridge Road (the A10).

Broadwater Farm estate benefits from a number of retail and enterprise workshops, which provide space for start-ups and small businesses, as well as providing retail for local residents.

Opportunities

- Support the development of opportunities for retail and enterprise to create vibrancy, add to local amenities and increase employment in Broadwater Farm estate
- Encourage mixed uses in residential areas to create vibrant, active, and safe neighbourhoods where small businesses and 'working away from home' spaces can flourish
- Facilitate the ability of local centres to adapt to trends in retail habits to best serve their community's future needs
- Changing trends in retail habits mean local centres need to adapt to best serve their community's future needs

What do you think?

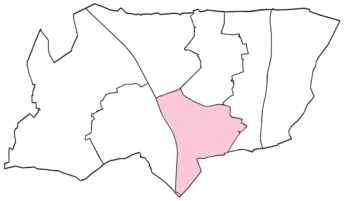
N13. Do you agree with the challenges/ opportunities that have been identified for White Hart Lane and West Green? Why/ why not?

N14. Are there any additional challenges/ opportunities that the New Local Plan can help address and how?

N15. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

4.9. Area 5: Harringay and St Ann's

This area is located towards the south of the borough, with the Great North Railway to its west and Seven Sisters area to the east. Green Lanes is the main route through the area connecting Islington and Stoke Newington with the north of the borough and is a renowned cultural destination. The neighbourhood consists of the Harringay Ladder to the west of Green Lanes and residential and industrial areas to its east.



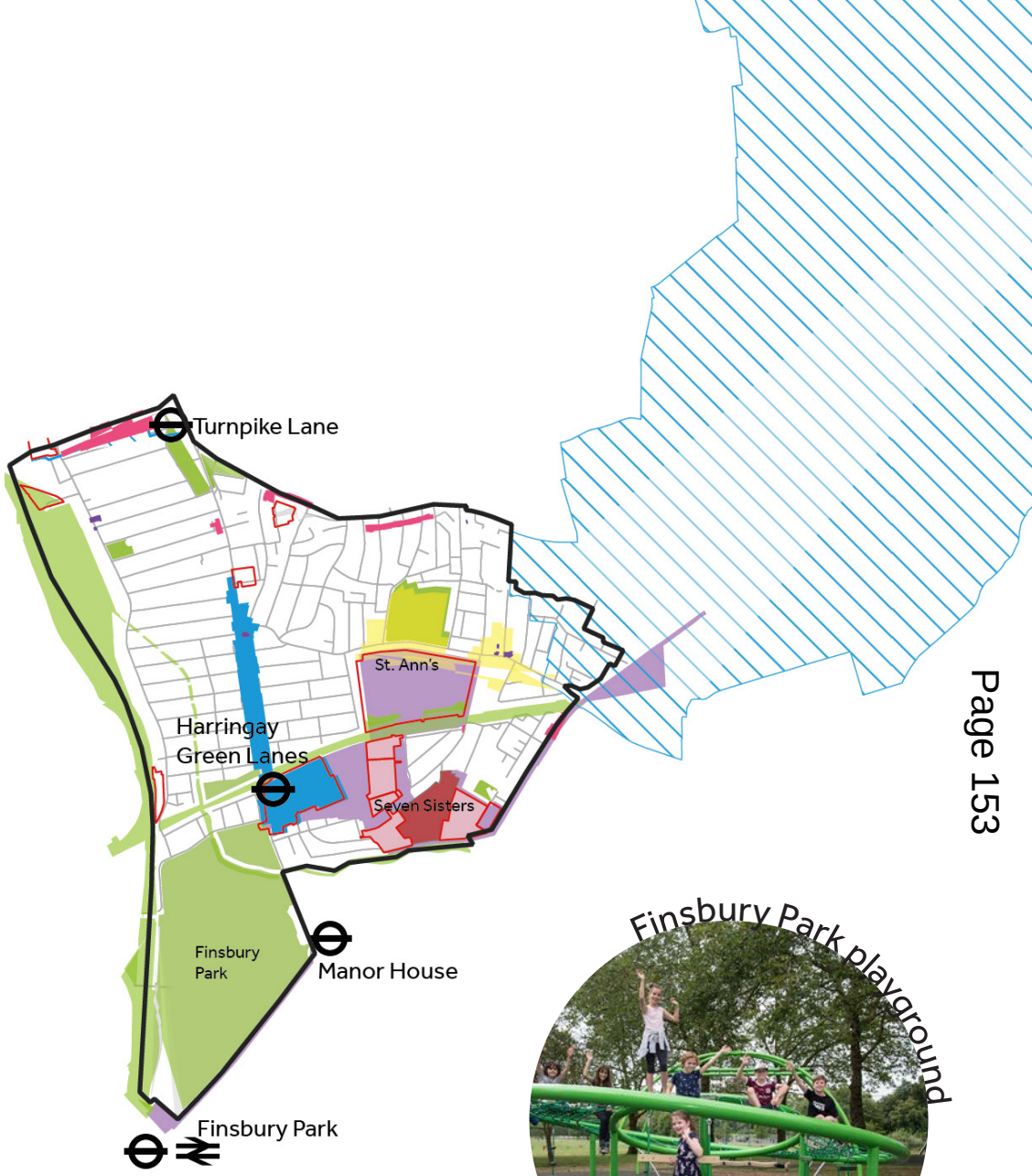
KEY

Town Centre and Growth
- District centre
- Local shopping centre
- Tottenham AAP
- Area of Change
- Site Allocation

Heritage and Conservation
- Statutory Listed Buildings
- Conservation Areas

Employment Land
- Locally Significant Employment Site (LSIS)
- Local Empoyment Area - Regeneration (DM37)

Other
- Green space




Finsbury Park playground

Housing

Key Characteristics

The Harringay ladder forms a large component of the residential area of this part of the borough, with uniformity of terraces creating a distinctive and legible character to the area. These provide valuable family housing, and the area is popular with young creative people. To the east of the area, away from the industrial areas there are quiet residential streets. This area also contains the Harringay Warehouse District which is a unique area where many former warehouses have been converted to provide a communal way of living and working, and is recognised as producing creative communities, being an affordable way for people to find housing, and makes a positive contribution to employment.

Opportunities

- A key redevelopment opportunity exists at St Ann's hospital site with the potential for a significant number of well-designed new family and affordable homes
- New homes could also be delivered as part of mixed use, employment led redevelopment in designated employment locations, and along Green Lanes on other strategic sites close to public transport

People

Key Characteristics

As with much of Haringey, this area's population is very diverse with significant Turkish and other European and Middle Eastern communities. There are clusters of young creative people attracted to the Green Lanes and Harringay warehouse living areas, with families living along many of the more suburban streets. The area has the highest proportion of private renters in the borough.

Opportunities

- Improve the public realm / lighting along the Green Lanes to help safety and security
- Improve connectivity through new green links through parks and street-side green interventions to support active travel by walking and cycling
- Create mini green space and civic space to help balance out the highly urban development form in the central part of this area

Place

Key Characteristics

To the south the area is flanked by Finsbury Park to the west Green Lanes and the New River to the east. The area is served by the London underground Piccadilly Line at Manor House Station to the south and Turnpike Lane Station to the north. It is also served by London Overground at Harringay Green Lanes Station and the Great Northern trains at Harringay Station.

St Ann's Hospital defines the eastern end of the area along with Chestnuts Park. The park is a well-used community space characterised by impressive open views. This area is also home to the St Ann's conservation area.

The Woodberry Down Estate in Hackney forms a landmark defining this edge. Just north of this, to the east of Green Lanes, the late Victorian and inter-war industrial buildings form a key part of the area and are important economic hubs. The Harringay warehouse district falls within part of this area.

Opportunities

- Significant redevelopment opportunities exist at the St Ann's hospital site and in certain employment areas, with opportunities to improve legibility and walking and cycling opportunities in the area
- Potential to improve paths and extend them such as the Harringay passage and New River Parks
- Address parking and traffic congestion and the poor areas of public realm along Green Lanes

Economy

Key Characteristics

The retail parades along Green Lanes are vibrant and a noted destination for food, with many restaurants situated along them. Some shop fronts, however, are in poor condition with cluttered facades. The 'box' style retail park south of Harringay Green Lanes Station and the railway is popular, but opportunities exist to redevelop.

The area is also home to six industrial and employment areas, which provide redevelopment potential to accommodate new, flexible workspace and add to the creative energy and vibrancy of the Harringay warehouse district where many creative people live and work . These areas also house many small to medium sized businesses with and storage and distribution prominent.

Opportunities

- New creative industries and flexible workspace through redevelopment within the five identified Local Employment Area; Regeneration Areas, alongside the potential for additional housing
- Support new industrial and employment floorspace opportunities through redevelopment of older units at the Vale and Tewkesbury Road Local Industrial Area
- Potential for improvements to the public realm, street frontages and vitality along Green Lanes to improve its attractiveness as a destination
- Redevelopment of the Green Lanes retail park

What do you think?

N16. Do you agree with the challenges/ opportunities that have been identified for Harringay & St Ann's? Why/ why not?

N17. Are there any additional challenges/ opportunities that the New Local Plan can help address and how?

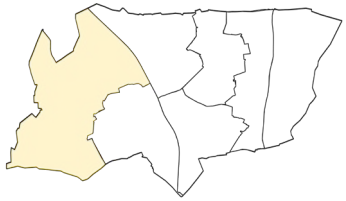
N18. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

4.10. Area 6: Muswell Hill and Highgate

This western area of the borough includes Alexandra Palace, Fortis Green, Muswell Hill and Highgate. These areas have a largely residential character but are home to a number of lively town centres and elegant shopping parades, as well as some of Haringey's best natural and cultural assets, including Alexandra Palace.

The Highgate Neighbourhood Plan was made (adopted) by the Council in July 2017 and forms part of the borough's statutory Development Plan. The Plan, prepared by the Highgate Neighbourhood Forum, sets out the Forum's vision for Highgate to 2031 and contains core objectives relating to social and community needs, economic activity, traffic and transport, open spaces and public realm and development and heritage. The Council will have regard to these when preparing the New Local Plan.

KEY



Town Centre and Growth
- District centre
- Local shopping centre
- Tottenham AAP
- Area of Change
- Site Allocation

Heritage and Conservation
- Statutory Listed Buildings
- Conservation Areas

Employment Land
- Locally Significant Employment Site (LSIS)
- Local Empoyment Area - Regeneration (DM37)
- Local Employment Land (DM37)

Other
- Green space



Housing

Key Characteristics

The area is primarily residential area with a varying mix of compact and dense urban villas and townhouses, spacious inter-war suburban housing, purpose-built mansion blocks and apartments. There are more owner-occupied households in the area compared to the wider borough. Across the wider area, there is a lack of affordable housing and limited land available for intensification.

Opportunities

- There are opportunities, such as the Aylmer Road and Archway Road gyratory, to create clusters of taller buildings to provide an opportunity for new development and create significantly more affordable homes for local residents
- A number of infill sites can be identified for residential opportunities, including for affordable housing
- Also, some aging and shrinking families in larger Edwardian houses could be willing to downsize if provided with attractive alternatives

People

Key Characteristics

This area has an older and less diverse population than Haringey as a whole. It is one of the more affluent areas of the borough, with higher education and skills levels, and good health outcomes.

Opportunities

- Continue the improvement of Alexandra Palace as the People's Palace – a place for leisure, retail, hotel, exhibitions, events, recreation, attractions, museum and heritage focal point
- Highgate School also has an important role in shaping the area's character with spacious grounds and listed buildings such as the Chapel. A Supplementary Planning Document is currently being prepared to help manage the school's future development

Place

Key Characteristics

With no tube or mainline station, except for Highgate Tube Station, only bus services, perched high up on the northern heights, the area derives its character from this perceived separation which gives it an urban village feel. Within this uniform set piece townscape, buildings such as the art-deco Odeon Cinema (Grade II listed) mark nodal points. The area has a strong independent character and sense of itself. Alexandra Palace stands proudly and solidly on the highest point of the area, with unsurpassed panoramic views of London.

The wider area is not very well connected. While Highgate to the south enjoys good north south and east west connections with underground and road transport, the rest of the area does not. Both Highgate Woods, Queen's Wood and Cherry Tree Wood in Barnet are ancient woodlands with high ecological significance. Highgate village core has an organic and very fine grain form with narrow street frontages and deep plots running into back land spaces. Beyond this the area has a compact and fine grain urban terrace form. Many landmark buildings such as Highpoint 1 and 2, Cholmeley Lodge, Southwood Park and Northwood Hall act as key wayfinders within the area.

Opportunities

- The existing homogeneity of residential terraces, rhythmic roof forms and decorative architectural features should be retained and maintained.
- Along retail parades, especially Archway Road, de-cluttering of facades, appropriate and limited signage and improvements to shop fronts would highlight the architectural quality of the buildings.
- The individuality of shops along Archway Road and Highgate High Street is unique to the area and should be retained.
- Improvement of public transport through Muswell Hill and Alexandra Palace would help to improve wider accessibility.
- Further improvement of the Parkland Walk having regard to the need to protect biodiversity

Economy

Key Characteristics

The area has some of the lowest levels of unemployment in the borough and the median household income is substantially higher than the Haringey and London averages.

The high streets in the area mostly have a strong retail offer, especially along Archway Road, where there are many specialist and independent shops. The centre and heart of Muswell Hill is comprised of 3-4 storey buildings, including elegant shopping parades. The area is home to Alexandra Palace, which is a key cultural and economic node in the borough.

Opportunities

- Continue working with Alexandra Palace to improve the 'Peoples Palace' as a place for leisure, retail, hotel, exhibitions, events, recreation, attractions, museum and heritage focal point
- Some town centres in the wider area would benefit from public realm and landscape improvements to enhance the shopping experience

What do you think?

N19. Do you agree with the challenges/ opportunities that have been identified for Muswell Hill and Highgate? Why/ why not?

N20. Are there any additional challenges/opportunities that the New Local Plan can help address and how?

N21. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

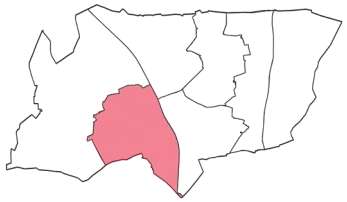
4.11. Area 7: Crouch End and Stroud Green

This area is located in the central western part of the borough and comprises Hornsey, Crouch End and Stroud Green. The area is predominantly residential with a green, leafy character. It is home to a number of thriving centres and some important natural and cultural assets, including Finsbury Park.

The area is home to two designated Neighbourhood Forums. Crouch End Neighbourhood Forum is currently proposing to prepare a Neighbourhood Plan based on six key areas: design and character, housing, environment, transport, economy, and social and community. Finsbury Park and Stroud Green Neighbourhood Forum is currently seeking to prepare a Neighbourhood Plan based around a vision of making their neighbourhood a sustainable, liveable and prosperous community. Key focuses include designating areas for regeneration and conservation, improving the environment, transport and connectivity, delivering community facilities in line with growth and ensuring that change befits everyone.



KEY



Town Centre and Growth
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- Site Allocation

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Employment Land
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- Local Empoyment Area - Regeneration (DM37)

Other
- Green space



Housing

Key Characteristics

The area contains a good stock of quality terraced houses lining pleasant and well-designed streets. The wards have small, compact, urban village characters. Across the wider area, the level of socially rented households varies considerably. Socially rented households are under-represented in Crouch End and Stroud Green compared to Haringey, while Hornsey households are slightly more likely to be social rented.

Opportunities

- The homogeneity in scale and roofline is the most important characteristic of the area and should be preserved
- There is scope for new development within estates or at sites along the railway line, which are currently under employment use
- New development should generally adhere to the low-rise medium density character of established Victorian and Edwardian street-based layouts, but there is opportunity for family-sized houses on small plots drawing upon the existing urban form
- The Hornsey Town Hall redevelopment scheme will deliver 146 new homes including 11 affordable homes

People

Key Characteristics

The area's population spread broadly mirrors that seen in Haringey but with an under-representation of younger people. It is one of the more affluent areas of the borough, with higher education and skills levels, and good health outcomes. There is a strong local art and creative scene.

Opportunities

- Additional sites can be identified to accommodate new social infrastructure, such as the Water Works site which could be converted for recreation and enhance connections with Alexandra Park
- Improved access to Parkland Walk as a recreation resource, having regard to the need to protect biodiversity
- Could reinforce the strong community identity across Stroud Green Road through cross-borough cooperation

Place

Key Characteristics

The wider area includes the open environments of Alexandra Park as well as Finsbury Park. These settings, along with many more local open spaces and parks, play a role in making the area a leisure and recreation destination. The small, compact, urban village character makes it a walkable neighbourhood with a comfortable scale and feel. There is good transport connectivity around Finsbury Park Station.

Opportunities

- The Hornsey Town Hall redevelopment scheme will secure the restoration of a Grade II* listed building and enable continued public access to the Town Hall in the long term together with new housing, a hotel, arts activity, workspace and related uses
- Create a node with activity and improved pedestrian environment at the northern end of Tottenham Lane by Hornsey Station
- Improve access to Alexandra Park and Finsbury Park from surrounding residential areas
- Strengthen Priory Road as a green link
- The Clock Tower landmark space in Crouch End could be improved and made a great space

- Protect and enhance Broadway Parade to include an excellent run of consistent shops and flats
- Better connections and entrances to Finsbury Park from Stroud Green Road, Upper Tollington Park and from Parklands Walk
- Reinforce the activity node at Harringay station – improve the public realm, better design of bridge, shopfront improvements and wider community led enhancements
- Make use of the Mount View Road covered reservoir – potential to create a neighbourhood park or wildflower meadow
- Enhancing the distinctive avenues – street tree planting, seating and homezone style improvements. Improvements along Stroud Green Road, especially under the railway bridges – improve lighting, public realm

Economy

Key Characteristics

Overall, the area has an unemployment rate lower than both the borough-wide and London levels, and median household income is substantially higher than the Haringey and London averages. The numerous high streets within the wider area contain a wide variety of shops, businesses, cafes and restaurants. There is a diverse mix of local independents that give the centres their distinctive community characters. Local arts and creative scenes are evident with Crypt, King's Head Pub (live music venue), Arthouse Cinema all within Crouch End alone.

Opportunities

- Consolidating the uses along the High Street in Hornsey would create a more centralised retail centre, enhanced by existing open spaces such as the St Mary's Churchyard and Priory Park at either end
- Public realm improvement could further improve the quality of the centre with enhancement of existing landscape features
- Meet demand for more commercial space and improve the range of offers in the town centre in Crouch End by expanding the defined District Centre down Tottenham Lane
- Encouraging well-designed mixed use developments with lively, active frontage, town centre complementary ground floor uses will enhance the shopping experience
- Continued cross-borough collaboration for Finsbury Park District Centre including through the Finsbury Park Business Network

What do you think?

N22. Do you agree with the challenges/ opportunities that have been identified for Crouch End and Stroud Green? Why/ why not?

N23. Are there any additional challenges/opportunities that the New Local Plan can help address and how?

N24. We would like your views on sites in the area that could support new development in the future. Please refer to section 6.2 where we are undertaking a 'call for sites' and section 6.3 where we are seeking views on sites that are already allocated for particular uses in our existing Local Plan.

5. Our Borough Priorities

In this section, the key topics to be addressed in the New Local Plan have been categorised under each of the Borough Plan Priorities: Housing, People, Place and Economy.

Each topic sets out:

What the New Local Plan should do, in particular, the national and regional policy requirements

The current situation: what does the existing evidence say about the current and future issues and opportunities the borough faces

Our initial ideas on **How the New Local Plan could help** to address these issues and opportunities through policy

What **Evidence** currently exists or will be gathered to support the New Local Plan

The Big Questions we want you to answer as part of this engagement and some **things to consider** when answering



5.1. Housing

Addressing the housing crisis is one of the biggest and most urgent challenges facing the borough. As such the Borough Plan identifies Housing as Priority 1 with a stated aspiration of "a safe, stable and affordable home for everyone, whatever their circumstances". We prioritise housing not because buildings or estates are important in themselves, but because the home in which a family lives is one of the most important factors in determining their prosperity and wellbeing.

The New Local Plan is a crucial tool for addressing the multiple housing failures that are impacting the borough. It should support the delivery of good quality homes of all kinds, in good quality neighbourhoods, and ensure that new developments provide affordable homes with the right mix of tenures to meet the wide range of needs across the borough.

It's about Fairness

The Haringey Fairness Commission Report set out that secure, good quality housing is a foundation of a decent life and highlighted housing disadvantage as a key factor that contributes to inequalities between different groups of residents in the borough. The Council recognises that the home in which a family lives is one of the most important factors in determining their prosperity and wellbeing and is therefore committed to ensuring that there are enough homes available in Haringey which people can afford, and which are all of a decent quality across all tenures. By ensuring every resident has a safe, stable and affordable home, we ensure they can participate in community life and achieve their full potential, and in turn build communities in which everyone can thrive, side by side, as equals.



5.1.1. Housing Supply

What should the New Local Plan do?

London has consistently failed to deliver the new homes its population needs for over thirty years therefore as a starting point the New Local Plan must help significantly boost the supply of new housing in the borough.

The London Plan sets minimum housing targets that must be included in our New Local Plan. Our existing Local Plan contains a borough wide housing target of 19,802 homes for the period 2011-2026 derived from the London Plan 2011 and the London Plan 2016. Since 2015 our annual housing target has been 1,502 homes per year.

The London Plan 2019 includes a minimum ten-year minimum housing target of 15,920 homes which equates to 1,592 homes per year, 6% more than the Council's current annual target. Of this new minimum annual target, the London Plan requires at least 260 new homes (based on a ten-year housing target of 2,600 homes) to come from small sites (defined as being below 0.25 hectares in size).

We are able to set higher housing targets in the New Local Plan, but we need to make sure we don't overpromise because we will need to be able to pass the two key housing tests set by national government. The Housing Delivery Test measures whether we have met our target for building new homes over the past 3 years. The Five Year Supply Test looks at whether we have enough new homes anticipated to be built in the next 5 years so that we can meet our housing targets for that period.

Not meeting these national tests will impact our ability to control new development coming forward in the borough.

The current situation

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

Annual completions on small sites have been consistently over 300 but it may be harder to meet this target over time.

In the past three years the borough has only delivered an average of 55% of the Local Plan annual housing target as measured by the Government's Housing Delivery Test. As a result, we have been required to publish a Housing Delivery Test Action Plan setting out the steps we will take to boost housing delivery.

We currently have a five-year housing land supply but the New Local Plan must go further than our existing Local Plan in supporting housing delivery so we stay on track with meeting Haringey's housing needs and providing additional housing choice in the borough.







How the New Local Plan could help

We propose including the minimum annual target of 1,592 homes per year in the New Local Plan. Not meeting this target will further exacerbate the lack of supply and affordability so it is important that the New Local Plan is focused on achieving it.

The target will be very challenging to deliver and the New Local Plan will have to set out a clear strategy for bringing enough land forward at a sufficient rate to deliver the 1,592 homes a year. To support delivery, we are considering having an additional policy in the New Local Plan specifically relating to housing development on small sites.

We are keen to hear your views about how the Council can support housing delivery. Section 6.1 sets out a range of growth approaches which could support the achievement of the target and focuses on how delivery can be achieved in a sustainable manner.

Gathering Evidence

We will review the site allocations within the existing Local Plan to assess what contribution they can make to housing supply in the New Local Plan.

We are carrying out a 'call for sites' exercise to help us find more potential housing sites (see Section 6.2).

We will carry out an assessment of potential housing sites to establish whether they would be suitable to be 'allocated' in the New Local Plan. This is called a Strategic Housing Land Availability Assessment (SHLAA).

We will commission a Small Sites Study to look at opportunities in the borough for meeting our small sites target in future.

The Big Question

H1. How should the New Local Plan support the delivery of an increased number of homes to meet the housing needs of the borough?

Things to consider:

How should we ensure a steady supply of new homes over the period of the New Local Plan?

How should the New Local Plan help ensure continued delivery of homes on small sites (0.25 hectares and smaller)?

5.1.2. Affordable housing

What should the New Local Plan do?

One of the key housing failures contributing to the housing crisis is a failure in affordability. House prices and rents have never been higher in Haringey compared to incomes and the supply of genuinely affordable housing has been shrinking for nearly forty years until recently.

The London Plan 2019 sets a strategic target for 50% of all new homes across London to be genuinely affordable (with a 35% viability threshold approach, explained later). It does not prescribe what affordable housing target we should set within our New Local Plan but it does expect that:

- Public sector land delivers at least 50% affordable housing
- Industrial land appropriate for residential use delivers at least 50% affordable housing where the scheme would result in a net loss of industrial capacity

Having regard to the London Strategic Housing Market Assessment, the London Plan 2020 sets out that the following split of affordable homes should be applied to residential development:

- A minimum of 30% low cost rented homes as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
- A minimum of 30% intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership
- The remaining 40 per cent to be determined by the borough as low cost rented homes or intermediate products based on identified need

This means that the New Local Plan cannot require all affordable homes to be social rented. There is a presumption in the London Plan though that the 40 per cent to be decided by boroughs will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London.

The New Local Plan will be a key tool for helping increase the supply of genuinely affordable homes. It should ensure that new developments provide affordable housing with the right mix of tenures to meet the wide range of needs across the borough. While a choice of homes will be needed to contribute to addressing the borough's needs for affordable homes, we think the New Local Plan should prioritise the delivery of social rented homes.





The current situation

The existing Local Plan requires affordable housing on sites capable of delivering 10 units (usually major applications) or more based on the following policy approach:

- A borough wide affordable housing target of 40% (based on habitable rooms)
- A tenure split of 60% affordable rent (including social rent) and 40% intermediate housing (except within the area covered by the Tottenham Area Action Plan where these percentages are reversed)
- The affordable housing mix on individual schemes is negotiated based on scheme viability assessments and up to date assessments of local housing need as set out in the Haringey Housing Strategy

Under the above approach we have established a strong track record of securing affordable housing within new developments. Of the 7,129 new homes delivered since 2011, 1,899 of these were affordable equating to 33.5% of total homes (39% by habitable room). On major schemes, 58.3% of total homes delivered were affordable (52.5% by habitable room).

However, until recently the majority of affordable housing which has been secured has been shared ownership or 'Affordable Rent'. While these products both fall within the Government's definition of affordable housing, they are not affordable to the average Haringey household in affordable housing need.

The Council is committed to ensuring that there are enough homes available in Haringey which people can afford and which are of a decent quality across all tenures. The Borough Plan contains a commitment to deliver 1,000 new council homes at council rents by 2022.

The Council adopted a revised Appendix C to the current Housing Strategy (2017-22) in February 2019. This stated that the Council wishes to see as high a proportion as possible of the new affordable homes being delivered as homes for general needs. It also expressed an explicit preference for social rent homes with rents at target rent levels, especially for Council rented homes at Council rents, where possible. Although it does acknowledge that are a large proportion of affordable rented homes delivered by Housing Associations will be London Affordable Rent.





Excerpt from Appendix C of Haringey Housing Strategy 2017-2022 setting out the preferred tenure mix the Council would like to see providing new affordable homes in the borough:

1. Low cost rented housing for general needs

This is low cost rented housing that is affordable housing for general needs rent, ie homes let to households in accordance with the Council's Allocations Policy. This includes:

- Social Rented housing, which is housing where the landlord is a Registered Provider, usually the Council or a housing association. Rents are significantly lower than market rents, and set in accordance with a formula set by Government. This is the Council's preferred low cost rented option
- Affordable Rent, which is a type of low cost rented housing, targeted at the same groups as Social Rent, but with rents set at a maximum of 80% of market rents. This tenure is no longer funded by the GLA and so is likely to become increasingly obsolete
- London Affordable Rent, which is a type of low cost rented housing, also targeted at the same groups as Social Rent, with rents based on, but in Haringey higher than, Social Rented housing (although the differential goes down as the number of bedroom increases) – ie somewhere between Social Rent and Affordable Rent. This tenure is now the main low cost affordable rented housing that the GLA currently expects to fund

2. Intermediate housing

Intermediate housing is affordable housing for sale and rent at a cost above social rent, but below market levels, which is intended for those not eligible for, or not a priority for, social rented housing, but not able easily to access market housing. This includes, but is not limited to:

- Shared ownership and shared equity, which are forms of intermediate home ownership, the former being part rent: part buy and the latter usually an interest free equity loan
- London Living Rent, which is a type of intermediate rented housing developed by the Mayor of London, with rents set at a third of local incomes. After a set period the occupant must purchase the property or move on
- Discounted Market Rent, which is a type of intermediate rented housing where rents can be calculated by a range of methods but cannot exceed 80% of local market rents. The Council's preferred intermediate option is Discounted Market Rent with rents set at London Living Rent levels
- Affordable Private Rent, which is the type of affordable housing that should be provided on Built to Rent schemes, with rents no more than 80% of local market rents. The Council would prefer the rents on these homes to be set at London Living Rent level

While the above are the Council's preferred options, acceptable forms of intermediate housing can also include a range of other forms of low cost home ownership or routes to home ownership such as Starter Homes, Discounted Market Sale and Rent to Buy.

Affordability

The Council expects providers to ensure that all new affordable homes being developed are affordable for Haringey residents.

With regard to intermediate housing, it is noted that, in many cases, intermediate rent will generally be the more affordable intermediate product for Haringey residents. The Council's preference for intermediate housing is Discounted Market Rent with rent levels set at the equivalent London Living Rent. But in all cases, the rent on intermediate homes should never exceed the percentages of local market rents set out below.

With regard to low cost rented housing for general needs, while the Council's preference is for Social Rent, it recognises that the general needs homes delivered by most Registered Providers on schemes funded by the Mayor of London are likely to be at London Affordable Rent. Where there are also existing schemes still being built out as Affordable Rent, ie tied to local rents, the maximum acceptable rent levels that should be charged are set out below.

The maximum rent for any intermediate or Affordable Rent home should not exceed the following: for 1 bedroom homes, 80% of local market rents; for 2 bedroom homes, 65% of local market rents; for 3 bedroom homes, 55% of local market rents; and for 4 bedroom homes and larger, 45% of local market rents. In addition, all rents for any general needs housing must always be below the applicable Local Housing Allowance threshold.

In addition, the overall affordability requirement for intermediate housing, to buy and to rent, is that net housing costs, including mortgage costs, rents, and service charges, should not exceed 40% of the net income received by a household.

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

Since the revised Appendix C of the Haringey Housing Strategy was published the Government has begun promoting a new affordable housing product called 'First Homes'. This is a form of Discounted Market Sale housing which would fall under the definition of intermediate housing as set out in the Appendix C excerpt above. The Government's intention is that these homes would be sold at a minimum of a 30% discount off market price. First Homes are not a preferred affordable housing tenure of the Council at present.

How the New Local Plan could help

We want the New Local Plan to deliver as much affordable housing as possible with a focus on genuinely affordable homes.

Raise the affordable housing target

The New Local Plan will consider whether it is possible to increase the current Haringey affordable housing target of 40%. National planning policy requires that planning policies do not make development financially unviable therefore the New Local Plan will need to balance the delivery of:

- A higher percentage of affordable homes versus more homes
- Low-cost rented homes versus the overall affordable percentage
- Social rent versus affordable rent/London affordable rent as the low-cost rented offer

Secure affordable housing on smaller sites

Following direction set out in the National Planning Policy Framework, the existing Local Plan does not require affordable housing on sites only capable of delivering fewer than 10 units.

However, some local planning authorities have used local evidence to justify at examination the inclusion of policies in their Local Plans which secure affordable housing contributions from smaller sites. Given the acute need for affordable housing in Haringey we will explore whether there is local evidence to support securing affordable housing contributions from all new residential development regardless of size. This would most likely be in the form of off-site provision or payment in lieu as it tends to be impractical to deliver affordable housing units on sites of under 10 units.

Deliver the right tenure mix

The New Local Plan will set out clear priorities for delivering genuinely affordable homes grounded in an understanding of local housing needs to ensure that the right mix of housing is delivered providing a range of tenure types and property sizes for different households.

In line with the Haringey Housing Strategy we think that the New Local Plan should prioritise the delivery of social rented homes and homes at London Affordable Rent. We want to hear what types of affordable housing you think we should be prioritising in development and what trade-offs you think would be most acceptable to make in the New Local Plan.

We are considering a specific Haringey policy on what is genuinely affordable for different households.

Vacant building credit

The National Planning Policy Framework seeks to incentivise landowners to bring brownfield land back into use via a Vacant Building Credit. This requires that where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.

As part of preparing the New Local Plan we will assemble a local evidence base to assess whether it is appropriate to apply Vacant Building Credit in Haringey. Subject to the findings, we are considering a policy in the New Local Plan which will set out whether the Vacant Building Credit will apply and if it will in what circumstances it will apply. Appropriate application of the Vacant Building Credit will help ensure that affordable housing is maximised, only genuinely vacant buildings benefit from it and that delays are avoided at planning application stage.

Viability/threshold approach/review mechanisms



The existing Local Plan takes a robust approach to challenging viability evidence to maximise delivery. We propose that the New Local Plan will take a similarly robust approach, taking account of latest policy and guidance at a London-wide level.

The London Plan expects boroughs to take a 'threshold approach' to major development proposals which trigger affordable housing requirements. This means that where a scheme provides a minimum of 35% affordable housing (or 50% on public sector land or industrial land) and meets other related criteria such as providing an acceptable tenure mix the application is fast tracked and the applicant is not required to provide a viability assessment. This is called the 'Fast Track Route'. We would like to know if you support this approach and whether you think it will incentivise developers to deliver higher levels of affordable housing by offering a fast track route through planning.

Schemes which do not meet the London Plan threshold are required to submit detailed viability information which will be scrutinised and treated transparently. This is called the 'Viability Tested Route'. A comprehensive review mechanism is applied to schemes that do not meet the relevant threshold to ensure that affordable housing contributions are increased if viability improves over time. This comprises an Early Stage Viability Review (which we carry out if development is not commenced within 18 months of the permission being granted) and a Late Stage Viability Review (which we carry out when 75% of units in a scheme are sold or let). We would like to know your views on the Viability Tested Route and whether it supports delivery of affordable homes in Haringey.

Use commuted sums/payment in lieu only in exceptional circumstances



The existing Local Plan is clear that on-site provision is the Council's preference for how affordable housing will be provided by developers. Only where exceptional circumstances exist, and where the Council is satisfied that it would be appropriate, will off-site provision or a cash in lieu of provision contribution be suitable. The London Plan reinforces this position and sets out further that cash in lieu contributions should be used in even more limited circumstances than off-site contributions. We propose that the New Local Plan will reflect the London Plan approach for major applications.

We intend to review whether sites of under 10 units could contribute to affordable housing. If this is found to be the case, then this would most likely be through off-site provision or payment in lieu.

Ensure tenures are integrated



It is important that the New Local Plan delivers mixed communities and inclusivity. In addition to policies to secure mixed tenure developments, the New Local Plan will contain policies to maximise tenure integration and deliver key design and placemaking principles such as tenure blindness which ensure affordable homes have the same external appearance as private homes.

Gathering Evidence



We have commissioned a Strategic Housing Market Assessment (SHMA) which, among other things, will establish the overall need for affordable homes in the borough as well as identify the specific needs for each affordable housing tenure including Social Rented homes and intermediate tenures.

We will commission a Whole Plan Viability Assessment to provide an evidence base to inform the Council's new affordable housing policies to ensure the policies do not make development financially unviable.

The Big Question



H2. How can the New Local Plan increase the number of high quality affordable homes delivered in the borough?

Things to consider:

What percentage of new homes in the borough need to be affordable?

What should the New Local Plan affordable housing target percentage be?

What percentage of affordable housing is financially viable to deliver in Haringey?

In addition to requiring affordable housing from sites of 10 units or more, should the Council have a policy to secure affordable housing from smaller sites too, if it can be demonstrated that this is justified including being financially viable? If viable do you think that contribution should be via off-site contributions or payment in lieu?

What types of affordable homes are most needed in the borough?

Should more affordable rented homes be provided at Social Rents or London Affordable Rent (which are lower level rents) rather than 'intermediate' tenures, even if this reduces the number of affordable homes delivered?

Should low-cost rented affordable homes be provided as social rented homes or London Affordable Rent?

Intermediate affordable homes include shared ownership and shared equity, London Living Rent, Discounted Market Rent, Affordable Private Rent and First Homes (a type of Discounted Market Sale). What types of intermediate affordable homes are most needed in the borough?

Do you support the London Plan threshold approach which reduces or removes viability assessments for developments that meet a certain level of affordable housing?

Do you support the New Local Plan providing policy on how the Vacant Building Credit will be applied in the borough?

5.1.3. Existing stock

What should the New Local Plan do?

One of the key housing failures in London is one of distribution with large amounts of homes either under-occupied or over-crowded. In order to deliver our housing aspirations, the New Local Plan will need to help get the best use out of the borough's existing housing stock.

The current situation

Our existing Local Plan contains policies to resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace.

It also seeks to maintain a supply of larger family homes to meet Haringey's housing need. It does this by designating a Family Housing Protection Zone and only allowing conversions to small units in limited circumstances.

The borough contains over 10,000 private sector Houses in Multiple Occupation (HMOs) which play an important role in meeting local and strategic housing. To help ensure these are appropriately managed we introduced an Article 4 Direction in November 2013, which removed permitted development rights for conversion to small HMOs (3-6 unrelated people) within the east of the borough. Linked to this, the existing Local Plan contains a policy setting out the criteria that must be met for HMO proposals to be permitted.





How the New Local Plan could help

The New Local Plan will continue to protect against the loss of existing housing, including affordable housing and specialist forms of accommodation, unless the housing is suitably replaced.

The London Plan sets out that the demolition of affordable housing, including as part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. We support this approach and propose to include a policy in the New Local Plan giving further clarity about the criteria which must be met when seeking to demolish and replace affordable housing. Further policies on this will be set out in the Council's new Housing Strategy to ensure residents are fully supported.

Subject to evidence that the need for family housing remains high, the Council proposes to continue with the current policy approach of maintaining a supply of larger family homes. We will review whether the existing Family Housing Protection Zone remains appropriate.

The Article 4 Direction applying to small HMOs within the eastern part of the borough has proven to be an important tool for controlling the impacts of HMOs on local communities. We intend to continue with a criteria-based approach to assessing applications for small HMOs in this part of the borough. We would like your views as to whether this policy need to be amended to further control impacts of HMOs on local communities.

The Big Question

H3. How can the New Local Plan get the best use out of the borough's housing stock?

Things to consider:

Should the existing policy approach to HMOs be further strengthened to control impacts and if so how should it seek to do this?

5.1.4. Housing mix, housing quality and accessible housing

What should the New Local Plan do?

The New Local Plan should set out the mix of housing to be achieved on sites around the borough, including setting out where smaller and larger homes are best provided. This will help to ensure new homes meet local housing need as well as ensure inclusive and mixed sustainable neighbourhoods.

It should also set out accessibility and space standards for new homes to ensure new homes are of a suitable quality and reflect specific housing needs of residents. In their Final Report the Haringey Fairness Commission specifically recommended that:

- The Council should ensure that the highest standards of safe, inclusive and accessible design are secured in all new developments, recognising the frustration that disabled people and other residents feel when new local developments and businesses are inaccessible (recommendation 10)
- The Council should do more to recognise and respond to the specific housing issues affecting disabled people (recommendation 17)

The importance of adequately sized homes to the health and wellbeing of residents has been particularly highlighted by the COVID-19 pandemic.





The current situation

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

- 5.5% bedsit/studio
- 40.4% one bedroom homes
- 45.6% two bedroom homes
- 12% three bedroom homes
- There has been an overall loss of 4 or more-bedroom housing in the borough, with 206 family homes taken out of Haringey's overall housing stock in the past 8 years. This loss in family housing is mainly attributed to conversions and Certificates of Lawful Use. However, the losses in recent years have not been as high as earlier in the plan period, which is partly attributable to policies the Council introduced limiting the conversion of family housing in certain parts of the borough

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

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

The existing Local Plan adopted in 2017 requires that proposals for schemes involving new residential development should provide a mix of housing. It sets out a presumption against proposals which will result in an over-concentration of 1 or 2 beds homes unless there is appropriate justification for this.

Appendix C of the Haringey Housing Strategy sets out the Council's target dwelling mix for affordable housing. The target dwelling mix for Social Rent and other low cost rented housing is:

- 10% one bedroom homes
- 45% two bedroom homes
- 45% three bedroom or more homes (10% being four bed or more)

The target dwelling mix for intermediate housing is:

- 30% one bedroom homes
- 60% two bedroom homes
- 10% three bedroom (or more) homes

The existing Local Plan requires that new development meets or exceeds the minimum internal and external space standards of the London Plan and associated guidance.

The London Plan contains a detailed policy on housing quality and standards requiring that housing development should be of high quality design, and provide adequately-sized rooms, with comfortable and functional layouts, which are fit for purpose and meet the needs of Londoners, without differentiating between tenures. It requires homes to meet minimum private internal space standards as well as setting minimum private outside space standards.

The existing Local Plan requires 90% of new housing to meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% to meet Building Regulations requirement M4(3) 'wheelchair user dwelling', ensuring they are designed to be wheelchair accessible or easily adaptable for wheelchair users. Appendix C of the Housing Strategy also sets out that a minimum of 10% of all affordable homes should be wheelchair accessible, with an aspiration of 20%.

The London Plan contains a specific policy on accessible housing in order to provide suitable housing and genuine choice for London's diverse population, including disabled people, older people and families with young children. This sets out that residential development should comply with the same Building Regulation requirements our existing Local Plan requires.

How the New Local Plan could help

The New Local Plan will contain policies setting out the housing mix that should be delivered in the borough, including for affordable housing, to achieve communities that are inclusive to everyone and are appropriately mixed in terms of demographics, household types and tenure.

We propose that the New Local Plan will follow the space standards set out in London Plan. We propose also that it will continue to follow the accessibility standards set out by Building Regulations.

Gathering Evidence

We have commissioned a Strategic Housing Market Assessment (SHMA) to identify the specific mix of housing needed in Haringey over the period of the New Local Plan. This will include consideration of the needs of specific user groups.

The Big Question

H4. What do you think are priorities for the type and size of new homes in Haringey?

Things to consider:

The existing affordable housing stock in Haringey contains a high proportion of larger properties. Do you think the New Local Plan should focus on the provision of smaller affordable housing units to help get better use out of the Council's housing stock as a whole and to help meet acute needs of those currently in temporary accommodation?

How can the New Local Plan help address specific housing issues affecting disabled people?

Do you agree that the New Local Plan should follow the minimum space standards in the London Plan?

Do you agree the New Local Plan should continue to opt-in to Building Regulation standards in relation to accessible dwellings?

5.1.5. Specialist housing

What should the New Local Plan do?

Specialist housing models make a key contribution to meeting housing needs at a local level. These include but are not limited to:

- Supported and specialised accommodation
- Specialist older persons housing
- Gypsy and Traveller accommodation
- Purpose-built student accommodation
- Build to Rent
- Large-scale purpose-built shared living
- Self-build and custom build housing
- Warehouse living

It is important that the New Local Plan helps secure the provision of a full range of housing types. At the same time, it is essential that robust policies are in place to ensure specialist housing offers high quality accommodation that meets the requirements of the specific use or group it is intended for. It is a particular priority for the Council to provide safe environments which facilitate independent living for vulnerable residents and older people in Haringey.



'Trees' Extra Care Housing Scheme

There are 40 apartments for older people on what is a beautiful site located in Highgate's Conservation Area. The scheme is unique in that it is the first 100% affordable housing project in this part of Haringey.

Lorenco House

Lorenco House is an exemplar extra care housing scheme which provides affordable homes for older people in Haringey.



The current situation

Supported and specialised accommodation



Supported and specialised accommodation comes in a variety of models or types and can be defined differently within the Use Class Order.

The existing Local Plan contains a policy on special needs housing which sets out that proposals will be supported where there is an established local need and various criteria are met related to quality and design and location.

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

- Older people with complex needs such as learning disabilities, mental health and substance misuse, and accessible sheltered housing units for those with physical disabilities
- People with mental health conditions leaving hospital and/or secure units, and specific units for women being released / discharged from hospitalPeople with learning disabilities who require supported living units
- Single homeless adults requiring move on accommodation, including those with complex needs
- Vulnerable young people/care leavers with complex offending/gang related needs; young women at risk of exploitation; and smaller services for young people to learn independent living skills
- Survivors of domestic violence, and particularly provision for women from BAME backgrounds and for women with disabilities

Appendix C of the Haringey Housing Strategy sets out that all new and converted supported housing is required to be accessible or adaptable for those with physical disabilities.

The London Plan contains a specific policy for supported and specialised accommodation. This sets that supported and specialised accommodation could include:

- Accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independently
- Accommodation for young people with support needs
- Reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support
- to be able to return safely to live independently at home, or to move into appropriate long- term accommodation
- Accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible
- Accommodation (short term or long term) for people with mental health issues who require intensive support
- Accommodation for rough sleepers
- Accommodation for victims of domestic abuse
- Accommodation for victims of violence against women and girls

The policy sets out that the delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. It requires that boroughs should undertake assessments of the need for short term, medium term and permanent supported and specialised accommodation within their borough.

Specialist older persons housing



The existing Local Plan addresses specialist older persons housing as part of a broader policy on special needs housing. This sets out that proposals will be supported where there is an established local need and various criteria are met related to quality and design and location.

The London Plan contains a specific policy for specialist older persons housing. This sets out how boroughs should seek to identify sites which may be suitable for specialist older persons housing and what specialist older persons housing provision should deliver including affordable housing.

Gypsy and Traveller accommodation



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

The existing Local Plan contains a policy to protect these two sites and sets out criteria that a new site or substantial alteration to an existing site will have to meet. The Plan identifies that the borough requires four additional pitches up to 2017 to meet the need identified in the London Gypsy and Traveller Accommodation Needs Assessment 2008. It does not allocate any sites for further pitches but identifies one site which may be suitable for pitches.

The London Plan 2019 contains a specific policy on Gypsy and Traveller accommodation. It sets out that boroughs should plan to meet identified need for permanent Gypsy and Traveller pitches and must include ten-year pitch targets in their Local Plans. The policy identifies the definition of 'Gypsies and Travellers' that boroughs should use as a basis for assessing need. The definition given conflicts with the Government's definition in the national Planning Policy for Traveller Sites. The London Plan definition is much wider and indicates that in assessing need those living in caravans, those with a cultural preference to not live in bricks and mortar accommodation and those that have ceased to travel for reasons of health, education or old age should all be included. The rationale for this is that the national definition excludes many of those who have ceased travelling but who identify with the cultural traditions of this group.

As a consequence, there are effects for under-counting and equality. The Inspectors' report on the London Plan stated that the definition in the Plan should be consistent with the Government's definition and recommended that this should be amended in the final London Plan. When preparing the Intend to Publish London Plan the Mayor chose to retain his original definition and the final wording of the Plan in this area is currently under negotiation between the Mayor of London and the Secretary of State for Housing following his issuing of a direction which among other things required the final policy to be amended in line with the Inspectors' recommendation.

Purpose-built student accommodation



The existing Local Plan has a policy addressing student accommodation under the broader category of specialist housing. This sets out where student accommodation should be directed to if it is required to meet local and strategic need and the criteria proposals will need to meet to be considered acceptable. Affordable student housing is required if the accommodation is unsecured. The London Plan includes a policy on purpose-built student accommodation. The Plan identifies an overall target strategic target for purpose-built student accommodation but does not break this down into borough-level targets. Appendix C of the Haringey Housing Strategy sets out that there is no explicit identified need for additional student housing in the borough and proposals to develop student housing will not normally be supported.

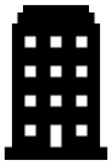
Build to Rent



The existing Local Plan does not contain any specific policies on Build to Rent. However, the Haringey Housing Strategy 2017-2022 recognises that a reasonable supply of good quality housing for private rent, especially for families, is vital to meeting the needs of local households who cannot access home ownership or affordable housing. It also notes that the development of new private rented housing can also increase overall levels of supply by not competing with housing for sale. The Housing Strategy therefore aims to enable the development of new high quality, purpose built private rented accommodation for the long-term by encouraging new sources of private investment. Build to Rent is a key opportunity to provide better living conditions and longer tenancies within the private rented sector in Haringey.

In recent years, there has been significant growth of the Build to Rent sector, particularly in London. In response to this, the London Plan includes a detailed policy on Build to Rent setting out the criteria a scheme must meet to qualify as Build to Rent and the expected affordable housing offer within it (Discounted Market Rent).

Large-scale purpose-built shared living (co-living)



In recent years a new 'co-living' housing model has emerged across London. This has been termed large-scale purpose-built shared living by the GLA and in response to its emergence, the London Plan includes a detailed policy setting out the criteria it must meet including setting out the affordable contribution is will be expected to make. The existing Haringey Local Plan does not contain a policy which directly addresses this housing type. There is not currently any housing of this type in the borough.

Self build and custom build housing



The existing Local Plan contains a specific policy on self and custom build housing setting out the Council's general support for it as a housing type. The London Plan does not have a specific policy on this housing type but it has a policy on Small Sites which states that boroughs should support well-designed new homes on small site in order to support those wishing to bring forward self-build and community-led housing.

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

Warehouse living



The existing Local Plan identifies a specific type of land use called 'warehouse living' that has emerged over time in certain employment locations within Haringey. It comprises purpose built and genuine integrated, communal working and living accommodation specifically targeted at the creative industries sectors. This development typology does not fall within a specific Use Class – and is not live/ work development – and is considered a 'Sui Generis' use. The Development Management DPD contains a specific policy for warehouse living which makes provision for proposals for warehouse living within selected areas. It sets out that the Council will support proposals for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element. Warehouse living proposals will only be acceptable within those identified locations.

We propose that the New Local Plan will also have a specific policy for warehouse living to ensure existing and future occupants are provided with an appropriate standard of living, the existing creative industries and SME sectors are supported and given room to grow, and the creative living and working offer of these sites is maximised.



How the New Local Plan could help

We have commissioned evidence to understand what the future need is in Haringey for a range of specialist housing models. The New Local Plan will contain policies to promote and support the delivery of high-quality specialist housing types to meet local need.

The London Plan contains detailed policies for various specialist housing types. These already form part of our Development Plan so there is no need to duplicate these. We are keen to hear from you about how we can further support specialist housing types for which there is an identified need or whether you think a Haringey specific policy is required for any specialist housing type to ensure that local delivery is appropriate.

Gathering Evidence

We have commissioned a Strategic Housing Market Assessment (SHMA) to identify the need for various types of specialist housing over the plan period.

We have commissioned a Gypsy and Travellers Accommodation Needs Assessment (GTANA) to identify the specific needs of Gypsies and Travellers.

The Big Question

H5. How can the New Local Plan support the delivery of specialised housing models that will help to meet housing need in Haringey?

Things to consider:

How can the New Local Plan support the delivery of supported and specialised accommodation?

Are there any particular sites that should be allocated for any of these types of supported and specialised accommodation? (Also see Call for Sites)

How can the New Local Plan support the delivery of specialist older persons accommodation?

How can the New Local Plan support the delivery of Gypsy and Traveller Accommodation to meet local need?

When assessing the need for Gypsy and Traveller accommodation should we use the Government's definition set out within the national Planning Policy for Traveller Sites or should we use the Mayor's definition as set out in the Intend to Publish London Plan 2019?

How can the New Local Plan support the delivery of self-build and custom build housing?

Do you think there is any issue with or anything missing in the London Plan Build to Rent policy which would require a specific Haringey policy within the New Local Plan?

Do you think there is any issue with or anything missing in the London Plan purpose-built student accommodation policy which would require a specific Haringey policy within the New Local Plan?

Do you think that there is opportunity to improve the current policy approach to warehouse living?

Do you think there is any issue with or anything missing in the London Plan large-scale purpose-built shared living policy which would require a specific Haringey policy within the New Local Plan?

Are there any other types of home that the New Local Plan should be supporting that will help to meet housing need in Haringey?

5.2. People

The borough's people and its communities are what make Haringey a special place. Priority 2 of the Borough Plan is 'a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential.' We want Haringey to be a stable and family friendly borough, where people can increase their life opportunities, build their networks and stay in the area for the long-term.

Haringey's health care services are vital to maintaining and improving the health and well-being of life for our residents, and access to high quality education and training has a profound effect on the life chances of residents, and is one of the most powerful ways to break down inequalities and improve social mobility. Community facilities of various types play a key role in building strong communities and connecting communities within and across the borough. The New Local Plan is an important tool to support the borough's people by helping ensure the right social infrastructure is in place to enable them to thrive.

Improving the wellbeing of residents is a fundamental priority for the Council. The Borough Plan (2019-2023) states that 'we will reduce the gap in outcomes for different residents and tackle the barriers that disproportionately affect the independence, health and wellbeing of some residents, using a social model to tackling disadvantage that looks at the systemic and other barriers that can prevent people from achieving their potential'. We will seek to enhance the wellbeing of residents through a holistic approach that recognises the contribution of a whole range of factors to this aim including housing, place and economy.

It's about Fairness



The Council's vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential. We recognise, however, that some people – children, young people and adults – will face additional barriers to achieving their ambitions and that there are stark inequalities between the experiences of different residents. The Borough Plan (2019-2023) states that 'we will reduce the gap in outcomes for different residents and tackle the barriers that disproportionately affect the independence, health and wellbeing of some residents, using a social model to tackling disadvantage that looks at the systemic and other barriers that can prevent people from achieving their potential'. We will seek to enhance the wellbeing of residents through a holistic approach that recognises the contribution of a whole range of factors to this aim including housing, place and economy.

The COVID-19 pandemic has particularly highlighted the importance of housing to well-being including its size, quality and its location. We want to deliver good quality play space and open space through new development and to increase access to and quality of existing open spaces. Access to green space and nature supports healthy lifestyles and it can be uplifting, increasing social interactions and reducing isolation. The presence of trees and other vegetation can have a positive impact on wellbeing as many residents decide to walk or cycle through green spaces as part of their daily journeys. We also want to create healthy streets that support active travel as well as create better meeting places for people either through new/remodelled community facilities or within open spaces. Access to good quality work also has an important impact on residents' well-being. In Haringey, there is a great variation in income and wealth between wards, as well as jobs and employment opportunities with a sharp divide between the east and west of the borough.

A key aim set out in the Haringey Fairness Commission is that the borough provides a fair start in life for children and young people and in this regard it sets out a commitment to working with other public sector partners to attain a UNICEF child-friendly borough status.

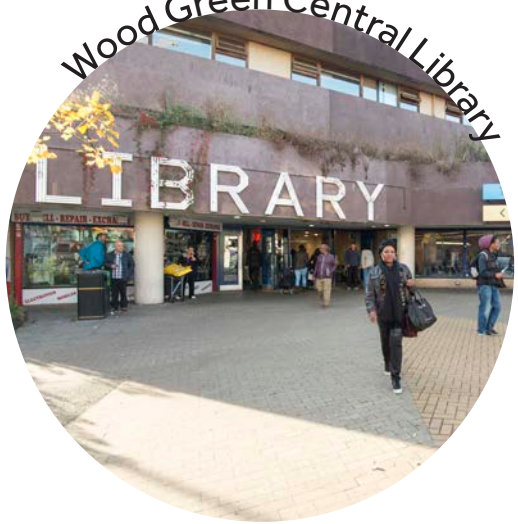
5.2.1. Social infrastructure

What should the New Local Plan do?

The New Local Plan should set out a clear vision for social infrastructure in the borough, reflecting the needs of our diverse population to develop healthy, strong and inclusive communities. It should identify local and strategic needs for a full range of social infrastructure, including education, health and community facilities, and set out a credible delivery plan to ensure appropriate infrastructure is in place to support residents and local communities, including the delivery of improvements to existing infrastructure and/or new facilities where necessary.

Haringey has seen an increase in need for social infrastructure in recent years and this will continue to grow in the future as we experience high levels of growth in line with the London Plan housing targets. This will require fresh approaches to infrastructure provision to facilitate more integrated approaches to service delivery, with a focus on collaborative working with service providers.

The New Local Plan should support provision of fully accessible facilities and services. This is both a function of where they are located and how easy they are to access including ability to walk, cycle or get public transport to them and their accessibility to people of all ages and abilities.

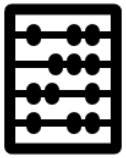


Wood Green Central Library


Welbourne

The current situation

Education



Recent years have seen greater volatility in school place projections as a result of changes to migration patterns, economic shifts, Brexit and further layers of policy on housing, universal credit and free schools. It is now clear however that we are over a recent rise in demand for primary school places and key future themes will be managing surpluses of places in primary schools, whilst safeguarding future provision and diversity in provision, alongside building additional capacity for Haringey secondary schools. There is a clear upward trend in the demand for secondary school places in the borough. Despite rises in planned admission numbers across secondary schools in the borough in recent years, in some circumstances, this is still resulting in a shortfall of capacity. Rises in planned admission numbers across secondary schools in the borough have taken place in recent years. Shortfalls of capacity are still projected until 2023/24 so additional capacity will need to be added.

There are 10 establishments in Haringey which offer post-16 (Years 12 and 13) capacity including 7 schools. Generally, schools in our borough with sixth forms are either full or near to capacity. The 2020 School Place Planning Report identified that 282 students from Haringey studied a vocational course in borough. This compares with 844 students from Haringey studying a vocational course out borough. As there are three times the numbers of students studying vocational courses out of borough than in borough, there are possibilities to absorb these numbers in borough in the future at the College of Haringey, Enfield and North East London (CONEL) and Haringey Sixth Form College and Ada National College of Digital Skills.

Health



There are 36 general practices in Haringey which currently deliver primary healthcare across the borough. A recent Capacity Review of key wards within the borough has identified existing capacity pressures. The study shows that Haringey's primary care estate has relatively high rates of patients per room. However, this is not necessarily an indicator of the quality of patient care. The practice with the highest ratio of patients to clinical rooms, West Green, is the only practice in North Central London (NCL) to have an overall Care Quality Commission Outstanding rating. London has fourteen practices that have been rated by the Care Quality Commission as outstanding for their leadership and Haringey has three of them.

A key future focus is on securing high quality estate and moving away from practices being run in terraced houses and converted shop fronts. For example, a new health facility in the Council's Welbourne development in Tottenham Hale is currently on-site which will replace facilities operating out of a terraced house (Dowsett Road) and a portacabin (Tottenham Hale).

An estimated 7,842m² of space is required across the borough by 2026 to meet need. Based on 1,800 people per GP, there are identified future shortfalls in Wood Green and large parts of the east of the borough including Northumberland Park, Harringay, St. Ann's, Seven Sisters, West Green and Tottenham Hale. New health provision is currently being delivered on Green Lanes and within Muswell Hill and outline permission has been granted for a health use on the Tottenham Hotspur Stadium site.

There are two significant change factors relating to health: (1) Haringey has the highest proportion of GPs over 55 years old in North Central London. There are a number of practices where leading GPs are coming to retirement or working beyond retirement age. In some of those practices, the premises are converted houses or shop fronts. It is unrealistic to expect a younger generation of GPs to come and work in those practices in Partnership roles and these practices may not be sustainable going forward; (2) COVID-19 has led to a significant investment in IT. During the pandemic, GPs and patients moved away from a system where almost all appointments were face to face to a system where only a very small proportion were. This may lead to a review of whether as much capacity is required. There is also likely to be a greater emphasis placed on the quality of the primary care estate. The direction of travel for primary care strategy is around an integrated workforce, with specialist staff sometimes employed by individual practices and sometimes working at scale.

Community facilities

Community facilities, such as community centres, places of worship, libraries and other cultural and civic uses, are the heart of the borough's communities. There are a wide range of facilities across the borough which contribute to its vibrancy. Haringey is home to 9 libraries. The borough's largest library, Wood Green Central Library, is one of the busiest public libraries in London and one of the top 10 busiest in the country. The borough is home to dozens of places of worship catering for a range of religions and faiths. It is likely that additional provision will be required to meet the future needs of faith communities.


Highgate Junior School: Central hub


Tottenham Green Leisure Centre and Library



Bowes Park Community Garden

How the New Local Plan could help

The key social infrastructure challenges for the future are set out below together with a range of ways which the New Local Plan could address them.

Achieving excellent education and training provision



As a starting point, the New Local Plan will support the provision of new or improved facilities and services to meet the current and projected needs for primary and secondary school places, as well as pre-school, post-16 and other education and training facilities. Additionally, the New Local Plan will:

- Safeguard existing facilities (including land and associated buildings) needed for educational and training use
- Support redevelopment or refurbishment of existing facilities where this is required to better meet educational and training requirements
- Identify new sites if needed working with landowners and developers to secure new sites
- Encourage existing and new facilities to be used flexibly to meet a full range of community needs where appropriate
- Support local employment and training opportunities and programmes to improve the life chances of local people and improve the local economy

We currently use the Greater London Authority's child yield calculator to determine the number of children a new development is likely to house. This informs the obligations new development will be required to contribute to support the children who will live there including high quality play space and open space. The Government has indicated it will be publishing a child yield calculator in the future which the Council could choose to use instead of the Greater London Authority's calculator.

Achieving excellent health care provision

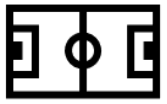


The New Local Plan will support the provision of new or improved health care facilities and services to meet the needs for primary care and reduce health inequalities and create healthier residents.

Additionally, it will:

- Safeguard existing facilities (including land and associated buildings) needed for health uses
- Support redevelopment or refurbishment of existing facilities where this is required to better meet health needs
- Identify new sites if needed working with landowners and developers to secure new sites
- Encourage additional teaching practices in the borough. Teaching practices take GP trainees and are very effective at retaining GPs locally as most trainees end up taking a full-time job in the practice where they trained

Providing excellent community facilities



The New Local Plan will support existing and new community facilities which contribute to the quality of life for our residents. It will:

- Guard against the loss of existing community facilities
- Support alternative community uses for community facilities that are no longer needed for their current purpose
- Support the expansion or enhancement of existing facilities and services where this meets community need
- Support provision of new community facilities in appropriate locations where there are known gaps in provision
- Work with developers, partners, the community and voluntary sector, on the wider use of buildings, dual use and co-location of services in accessible places and also to address gaps in existing provision, particularly encouraging community uses within mixed use, residential-led developments

How the New Local Plan could help ...

The New Local Plan will support development that results in a pattern of land uses and facilities with good access to local Infrastructure.

The New Local Plan must ensure that the relevant social infrastructure is in place to cater for local needs. We will review our infrastructure baseline and highlight areas of pressure or need for additional facilities. To aid in this, we will prepare an Infrastructure Funding Statement to accompany our New Local Plan. This will address existing infrastructure pressures and set out the infrastructure required to support the growth planned across the borough to 2037. It will also set out the ways this will be provided and when, the delivery mechanisms, possible funding sources and likely phasing.

The primary source of funding from new development towards new infrastructure is the Community Infrastructure Levy (CIL), which is already in place in our Borough. This will continue, and is not part of the new Local Plan, as it sits alongside it and is subject to separate governance processes.

Gathering Evidence

We currently have the following evidence relating to social infrastructure in the borough:

- Community Infrastructure Study (March 2010)
- Community Strategy (2015)
- Haringey Infrastructure Delivery Plan (IDP) update (2016)
- School Place Planning Report & Asset Management Plan (AMP) (Annual)
- Infrastructure Delivery Plan Update (April 2016)
- Upper Lee Valley Development Infrastructure Study (DIFS) (SDG, SQW, Carter Jonas) (Sep 2015)
- Planning Obligations Supplementary Planning Document (SPD) (March 2018)

We also use external data provided by the NHS, and in future will be able to consider reports generated through the North Central London Integrated Care System.

As part of the preparation of the New Local Plan we will carry out a comprehensive review of infrastructure need, funding and delivery mechanisms. We will compile all the findings into an Infrastructure Funding Statement (IFS).

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

The Big Question

PE1. What social infrastructure is needed over the period of New Local Plan to meet community needs?

Things to consider:

Are there any gaps in social infrastructure that needed to be addressed by the New Local Plan?

Are there any barriers relating to social infrastructure that need to be addressed by the New Local Plan?

How can the Local Plan ensure sufficient social infrastructure is secured from new development to meet the needs of the communities?

Do you think the current infrastructure funding approaches will deliver the necessary infrastructure? If not, how do you think funding should be raised?

Do you think that social infrastructure provision may need to change in the future as a result of COVID-19 (e.g. because of the need to socially distance)? If so, what should the key considerations be when planning for new social infrastructure?

How can the New Local Plan ensure a more equal borough, for example meeting the needs of children, older people, and disabled people?

Should the Council use the Mayor of London's or the yet-to-be-published Government Child Yield calculator, or are there other more appropriate ways of working out child yield of new developments?

5.3. Place

The quality of Haringey's environment is important to residents, businesses and employers and is a key attraction of the borough. In view of this, Priority 3 of the Borough Plan is that Haringey is 'a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green'.

We want Haringey to be a place of green open spaces that everyone can access; a place where the already excellent transport links get even better; where people are active and live longer, healthier lives and a place where people feel safe and secure in their own homes and neighbourhoods.

As the borough continues to grow, becomes better connected and continues to be a destination for many Londoners, we will need to ensure Haringey remains a safe and pleasant environment for all. We want to work with partners and the local community to achieve this and in defining and shaping how the borough looks and feels, both now and in the future. We want to ensure that growth in the borough is something that everyone can benefit from and produces sustainable, attractive, accessible high-quality buildings, homes, streets, parks and other open public spaces.



It's about Fairness

The quality of the local environment is very important to residents and businesses. The Council therefore seeks to ensure that Haringey is a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. As it stands, the environment is not as fair and inclusive as it could be. We are committed to delivering a healthier and greener place, which is cleaner, more accessible and more attractive, safer and as culturally engaged as possible. The effects of climate change and air pollution will be felt hardest by our most vulnerable residents therefore it is essential that we take radical steps to reduce our emissions and ensure we are resilient to its impacts.

5.3.1. Design

What should the New Local Plan do?

The creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, it creates better places in which to live and work and it helps make development acceptable to communities. Delivering high quality buildings and public places is a fundamental priority of the New Local Plan.

At the same time, the New Local Plan must also deliver significant growth. The London Plan requires the borough to provide a minimum of 15,920 new homes over the next ten years. This will require fresh approaches to accommodating development including at higher densities. It brings with it new challenges, including developing in areas with existing and valued local distinctiveness and character, some of which have not seen development in a long time.

The New Local Plan should set out a clear design vision and expectations for development, playing a proactive role in helping to secure good growth through good design which reconciles the high levels of growth and densification necessary over the forthcoming plan period whilst addressing inequalities and preserving and enhancing the borough's local character, natural and historic environments.







The current situation

The character of an area, as well as the quality of the public realm, plays a key role in making it unique and special. It gives a place its own identity. In Haringey, our historic and natural assets, including our conservation areas or particular buildings or places that provide a sense of place and civic pride, play a fundamental role in making the borough unique. These characteristics ensure the borough is locally distinctive as well as making it a valued and unique part of London. It is of critical importance that these areas and qualities are identified, protected and enhanced.

Our existing Local Plan takes a robust approach to ensuring that new development is of a high quality design. Policy DM1 of the Development Management DPD (2017) sets out the 'Haringey Development Charter' to ensure all new development and changes of use achieve a high standard of design and contribute to the distinctive character and amenity of the local area. To assist in delivering high quality development we have established a Quality Review Panel (QRP) which brings together a team of independent professionals from a range of backgrounds to scrutinise major and controversial development proposals. The QRP advises applicants, Council officers and the Planning Committee on their consideration of how well a development scheme is meeting the principles of the Haringey Development Charter.

To champion good design in the borough and celebrate development of the highest quality the Council holds the Haringey Design Awards every two years. The awards cover a broad range of categories and are next scheduled for 2021. In June 2020 the Council adopted the Haringey Housing Design Principles to provide design guidance for new council homes as part of the Council's programme of delivering 1000 Council homes at Council rents by 2022.

The Council has commissioned a Wood Green Design Manual and Character Study to support the delivery of an improved local environment in Wood Green through new development.

The London Plan contains a series of design policies seeking to ensure high-quality design whilst enabling the borough to meet borough-wide growth requirements. A key change of the new London Plan is that it no longer includes a density matrix for residential development. Instead it requires boroughs to optimise site capacity through a design-led approach that makes the best use of land. This approach is consistent with the already established design-led approach in the existing Local Plan. The London Plan seeks to support the use of modern methods of construction (MMC) to enable faster housing construction. MMC also offers the opportunity for a cheaper supply of housing and/or a greater level of affordable housing delivery.

In October 2019 the Government published a National Design Guide setting out the characteristics of well-designed places and demonstrates what good design means in practice. This indicated that a National Model Design Code would be subsequently published to set a baseline standard of quality and practice across England which local planning authorities will be expected to take into account when developing local design codes and guides and when determining planning applications.


Highgate Junior School central hub


Lorenco House


Pinnacle

How the New Local Plan could help

The New Local Plan is a key tool to address the design challenges facing the borough. The following section sets out three key challenges together with possible approaches to address them.

Achieving design excellence in building architecture and the public realm

The New Local Plan will contain policies to secure high quality design and architecture to create attractive, locally distinctive and liveable places. Approaches to support this include:

- Protecting and enhancing our built heritage: the borough's built heritage plays a fundamental role in creating local distinctiveness. The New Local Plan will reinforce protection for statutorily designated areas and buildings, such as conservation areas and listed buildings
- Protecting and enhancing our natural assets: the borough's natural assets provide multiple health and well-being benefits, as well as environment and eco-system benefits for its inhabitants. The New Local Plan will reinforce protection, identify further areas at risk and provide additional protection where necessary, and it will help to identify, create and protect a network of sites and corridors, introduce improved management and promote greater biodiversity
- Introducing a new urban design strategy: this would encourage design excellence and could include new design codes, standards and controls in relation to architectural styles and materials, storey heights, use classes, density and the way in which we design our streets and public spaces. Such a strategy could help us better integrate new developments into existing contexts

Optimising densities

The New Local Plan must optimise densities and deliver high/higher density development for the borough to deliver its housing targets. In line with the London Plan, the New Local Plan will seek to optimise site capacity through the design-led approach. It will include a policy (or policies) setting out how this should be achieved in Haringey. Specific approaches for optimising densities include:

- Tall buildings: tall buildings can make an important and positive contribution to providing densities and maximising the delivery of housing where there is limited new development land. The existing Local Plan has a policy on building heights which includes criteria for tall buildings and an accompanying figure setting out potential locations appropriate for tall buildings. As part of the New Local Plan it will be necessary to review whether the policy and Potential Locations Appropriate for Tall Buildings are still appropriate. The New Local Plan should continue to ensure that taller buildings are realised in appropriate locations across the borough, taking into account local context and character. A robust approach to the design and delivery of tall buildings will result in the delivery of additional housing as well as the creation of interesting and high quality focal points in the urban environment which do not compromise local character, heritage and sense of place
- Medium-rise, high density development: encouraging more medium-rise, high density development , where appropriate, would help deliver the additional housing that the borough needs. These developments make more efficient use of brownfield land than lower-rise types of development whilst potentially integrating better with suburban and local character than tall buildings because of their reduced scale
- Small-scale infill and extension developments: development on small sites has potential to contribute significantly to delivering the additional housing that the borough needs. The New Local Plan could place particular emphasis on identifying appropriate locations for small-scale development

Designing for a safe, accessible, healthy and inclusive borough

The New Local Plan will support the design of public spaces and buildings which foster accessibility and inclusivity, as well as community cohesion and interaction, with a high standard of amenity for existing and future users all across the borough. High quality design can play an important role in ensuring that developments can be used safely, easily and with dignity by all regardless of disability, age, gender, ethnicity or economic circumstances. The New Local Plan will support more equal levels of safety, accessibility and inclusivity in design, which currently vary across the borough. It will help make the borough a healthier place and address existing health inequalities. Approaches to help achieve these aims include:

- Design policies and standards for inclusive housing: The New Local Plan will include design policies and standards which encourage inclusive housing for older people and disabled people, as well as accessible and lifetime homes
- Design policies and standards for access and movement: the New Local Plan will ensure that pedestrian and transport linkages are designed to be inclusive. The principles of inclusive design are applied at the beginning of the design process so the needs of all individuals are considered at the very beginning
- Design policies and standards the public realm: The New Local Plan will help ensure that the public realm is fully inclusive. This include key areas such as town centres and open spaces as well as new publicly accessible spaces delivered through new development
- Design policies and requirements for healthy environments: The New Local Plan will ensure that all new development contributes to a healthy borough and addresses health inequalities as far as possible. The New Local Plan will set out the Council's requirements for Health Impact Assessment to support development proposals

Channing School Sports Hall



Tottenham Station Square



Holcombe Market



Gathering Evidence



In recent years we have sought to better understand the issues and opportunities relating to design in the borough and have produced the following reports:

- Urban Character Study (2015)
- Potential Tall Buildings Locations Validations Study (2015)

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

The Big Question



PL1. How can we secure high quality streets, buildings and public realm to enhance the borough?

Things to consider:

How should we promote the optimisation of densities of new development in the borough?

How should we promote safe, accessible and inclusive design?

How can the Council promote modern methods of construction (MMC) and ensure a high quality design outcome in MMC developments?

Should tall buildings be allowed across the borough or just locations with good public transport and facilities?

Should we amend the Potential Locations Appropriate for Tall Buildings set out in the existing Local Plan? If so, how do you think it should be amended?

Should the New Local Plan provide greater support for medium-rise, high density development?

What additional evidence should be gathered to help inform the New Local Plan?

Are there any other design issues we need to address?

5.3.2. Heritage and culture

What should the New Local Plan do?

Protecting and enhancing our historic environment



The historic environment is a valued resource. People may value a place for many reasons: for the stories it tells about the past, its distinctive architecture or landscape, its connections with notable people or events, its landform, flora and fauna, its beauty, or for its role as a community landmark. The weight of value of a heritage asset to current and future generations helps us identify its significance and the level of protection that should be provided to it. Our historic environment should reflect the knowledge, beliefs, and traditions of our diverse communities.

The New Local Plan will need to set out a clear vision for ensuring our heritage values are sustained and enhanced for the enjoyment of present and future generations. This is not just a role for the Council or Historic England, but for everyone in the community. Learning about our historic environment is key to understanding its significance in order to sustain it.

Development should enable conservation by allowing for managed change in our historic environment that keeps its significance intact and makes use of its heritage values to deliver wider social and economic benefits, for example as a generator of tourism, a learning resource, or a means to stimulate economic investment.

Good Growth means respecting heritage



The New Local Plan will need to look at opportunities to accommodate growth in a way that protects and enhances our heritage assets. The area around Tottenham High Road, for example, has long been identified as a regeneration opportunity, while containing a large proportion of the borough's listed buildings and conservation areas which are 'at risk'. In Haringey, there are currently 14 buildings and historic structures and 5 conservation areas on the Historic England Heritage at Risk Register (2019) (in 2018 we had 16 entries).

Rather than preventing growth, the historic environment should be an enabling resource for existing and emerging economic activities and regeneration. The growth of online shopping has meant that high streets and town centres need to offer more than just goods and services to attract visitors. Businesses and customers are increasingly attaching commercial value to premises and areas that provide a unique, authentic, and beautiful environment for work, leisure and/or retail. Our unique historic buildings and places are key to helping create the flexible, beautiful, and memorable places, rich in history, that attract new businesses, residents, workers, and visitors. When used as a tool for regeneration, our historic environment can be a competitive advantage, setting our town centres and high streets apart from those in other boroughs. A number of successful shopfront improvement schemes have been delivered in the borough in the recent past including along Green Lanes and in South Tottenham and new ones are planned along Turnpike Lane, Wood Green High Road and in North TottenhaM.

The creative industries have undergone huge growth in recent years and there is a pattern of businesses forming clusters in conservation areas. 26% of England's creative companies are in conservation areas, with two thirds of those located in London. Muswell Hill, Crouch End, Stroud Green and Highgate are in the top 60 nation-wide conservation areas with the largest number of creative industry companies in the England. Recently, there has been significant growth in creative industries in the Tottenham High Road conservation area.

The New Local Plan provides an opportunity to set out a strategy for using our heritage in achieving good growth in a way that supports our town centres and businesses while creating pleasant and attractive environments to live, work and play. If the regenerative and commercial value of our heritage assets is appreciated, they are more likely to be preserved and enhanced through development.

The importance of understanding our heritage and its impact on society



The historic environment has benefits beyond its regenerative and commercial value. It can help shape our society, inform our identity, providing a sense of belonging, and enabling us to understand our shared past, in all its diversity. By understanding the significance of our heritage we are better placed to use it to provide spaces for people to live, work, learn, interact and build social connectedness. The historic environment can also support art and culture industries, and a range of events and activities. Studies have shown visiting heritage sites has a positive effect on wellbeing.

The Council is already active in this space. We have recently been awarded a High Streets Heritage Action Zone grant of over £2 million from Historic England for the Bruce Grove Conservation Area in Tottenham. Together with £2.6m match funding from the Council this will fund:

- Undertaking physical works to buildings, including repair, reinstating lost features, supporting the conversion of historic buildings for new uses and improvement of shared spaces
- Facilitating cultural activities and events celebrating the history of the high street and its importance to local communities over the generations
- Empowering the local communities in decision making and implementation of the agreed works to make the high street the sort of place they want it to be

The New Local Plan offers an opportunity to set out a strategy for achieving key social and cultural benefits as well as rebalancing and minimise inequalities in access to and experience of our diverse cultural heritage.

There are several key challenges the strategy could address:

- Increasing engagement with heritage: The national 2018 'Taking Part Survey' collected data on which groups get the most benefit and enjoyment from visiting heritage sites. The top two reasons for visiting a heritage site were to spend time with other family and friends, or because of a general interest in history/ heritage. There were large disparities between some groups in how likely they were to have visited a heritage site in the past year. Adult Londoners were much less likely to have visited a heritage site (57.1%), compared with those in the South East (81.5%). Nationally, those of 'White' ethnicity (75.4%) were much more likely than ethnicities described as 'Asian' (56.3%) or 'Black' (42.3%), and homeowners (78.7%) were significantly more likely than social renters (50.7)

- Providing better access to heritage information: There is a lot of information available on Haringey's built heritage, for example Conservation Area Appraisal and Management Plans, Local Heritage Lists, and archaeological appraisals. It is important that this information is easy to access and in a format that is useful for the public
- Communication and promotion of our diverse and intangible heritage: The information we have tends to be focused on the built environment, when there are many intangible histories, particularly regarding our migrant communities. An example might be that a significant event occurred at a certain location. A local heritage asset may also be linked with a certain use or cultural practice which contributes to its significance. This diverse heritage should be treasured and celebrated
- Improving understanding of our local views: Views to and from our heritage assets can be part of their setting. In addition to the strategic view from Alexandra Palace to Central London, there are 44 local views which were identified in the Urban Characterisation Study produced to support the current Local Plan. There could be significant benefits to outlining the exact co-ordinates of these views and developing a greater understanding of the experience of the views that we are looking to protect
- Limited guidance on managing change around heritage assets: The value and significance of our heritage assets is linked to their setting. Currently there is not much borough specific guidance on how we manage change in the areas around our heritage assets to help enhance them

Despite our robust approach to protecting our heritage assets via planning policies and Article 4 directions, we note that there are some issues within the borough relating to implementation, such as within the Tower Gardens Conservation Area. We have made a number of new Article 4 Directions to seek to address these as well as updating our Conservation Area Appraisal and Management Plan (CAAMPs) to understand the full extent of the issue in order that we can enforce more efficiently within the constraints of our current resources.

Heritage and climate change

Our heritage assets are an important part of our building stock and have a key role to play in reducing carbon emissions. Historic England research indicates that carbon emissions of historic buildings could be reduced by over 60% through refurbishment and retrofit.

Historic England research shows that demolishing a historic building and replacing it with a new building can result in greater carbon emissions. If we reuse existing buildings, we can help minimise carbon emissions.





The current situation

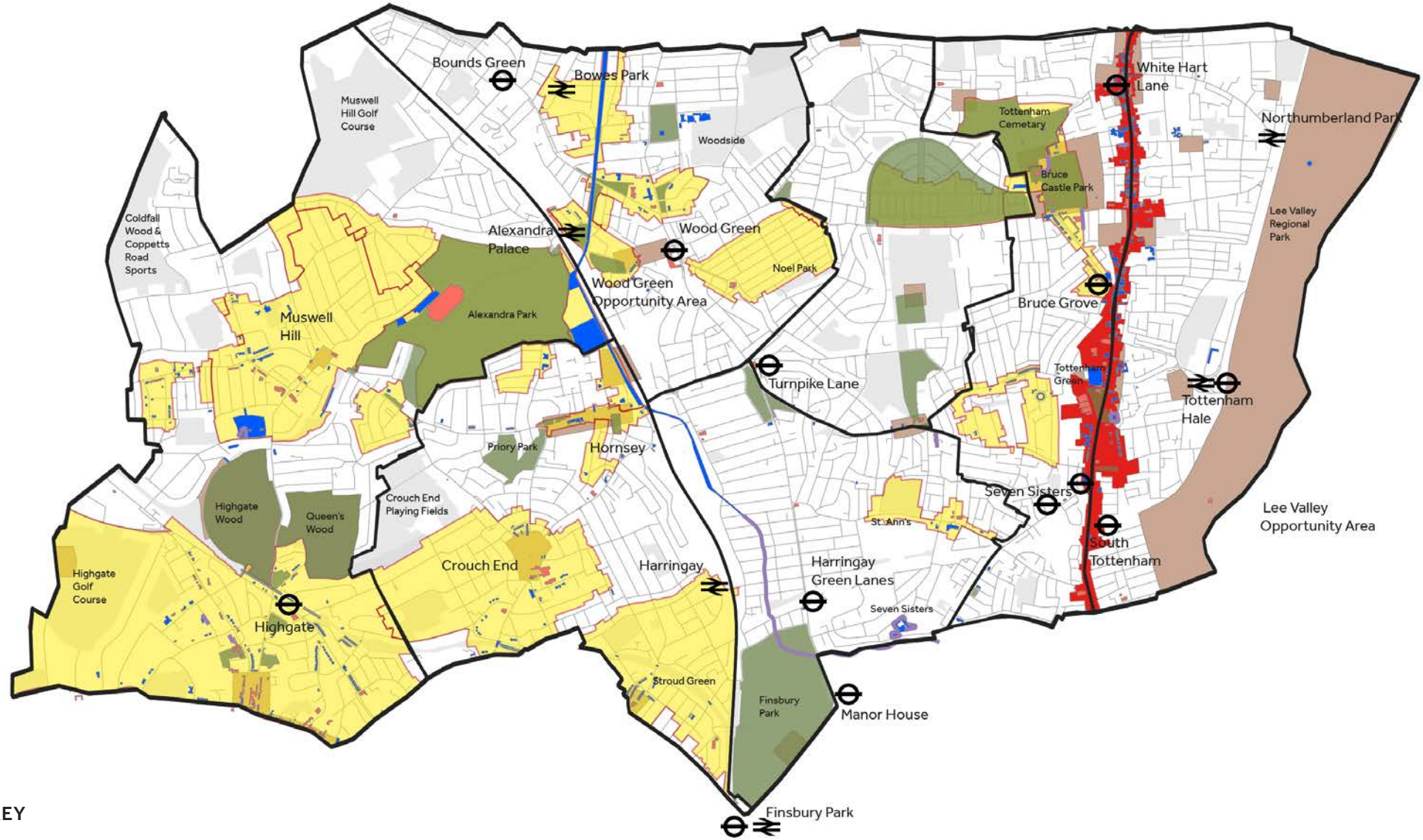
Our Wealth of Heritage Assets

- 28 Conservation Areas: A conservation area is an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. Local authorities have a responsibility to identify such areas and designate them as conservation areas
- 286 Statutory Listed Buildings: A statutory listed building is a building of national historical or architectural interest. The Statutory List is administered and updated by Historic England. Listed buildings are considered 'designated heritage assets' and are protected through the planning system. They are protected from demolition and listed building consent is required in order to make any alterations
- 1,177 Locally Listed Buildings and Structures: A local listed building is a building or structure of architectural or historic interest which makes a valuable contribution to the character of an area, but does not qualify for inclusion on the statutory list. These are non-designated heritage assets. Additional conservation considerations are given to the alteration of these buildings and the council will seek to ensure that the special character of such buildings is protected and enhanced
- 36 Historical Parks and Gardens: Alexandra Palace Park and Finsbury Park are on the National Register of Parks and Gardens of Historic Interest. The remainder are on the Register of Public Parks, Gardens, Squares, Cemeteries and Churchyards of Local Historic Interest
- 22 Designated Sites of Industrial Heritage Interest
- 22 Areas of Archaeological Importance: These are areas where history indicates there is considerable likelihood that archaeological remains will be found. In addition there are known sites of archaeological finds throughout the borough for which detailed records are maintained by the Historic England Greater London Archaeology Advisory Service (GLAAS) (external link)
- One Strategic View (from Alexandra Palace to Central London) and 44 Local Views identified in the current Local Plan

Haringey has 7 Conservation Area Advisory Committees which help the Council to manage and protect the historic environment. They assist us in the formulation of policies and guidance for their respective Conservation Areas and provide advice and updates on issues and challenges.







KEY

Heritage Assets

- Conservation Areas
- Tottenham Historic corridor
- Statutory Listed buildings and monuments
- Locally Listed buildings and monuments
- Historic Parks
- Archaeological Priority Areas

Other

- Green space

How the New Local Plan could help

There are a range of ways in which the New Local Plan could contribute, including to:

Develop a strategic approach to heritage

This could set out how we improve local engagement and identify how we can achieve good growth in a way that maximises the commercial, regenerative, social, and cultural benefits our historic environment offers.

Look at ways to recognise intangible cultural heritage

Although there are no statutory protections for intangible cultural heritage, the New Local Plan could include policies to encourage recognition of our diverse and intangible heritage in the built environment through tools like design and public art.

Provide targeted heritage policies

The New Local Plan could provide more targeted area-specific policies, particularly for areas of likely regeneration like the Tottenham High Road. It could also provide policies to guide applications affecting specific types of heritage, for example Historical Parks and Gardens or buildings on the Local List.

Provide additional guidance on Climate Change

The New Local Plan could provide additional guidance and support for refurbishing/retrofitting heritage buildings (as set out in the Council's Draft Climate Change Action Plan) to reduce climate emissions and better recognise the carbon reduction benefits in reusing heritage buildings instead of building new.

Provide greater clarity and guidance on Local Views

The New Local Plan could better define our Local Views, for example by including reference to their co-ordinates and the attributes of those views that we are looking to protect.



Gathering Evidence



We are continually working to understand our historic environment.

Our Draft Local Heritage List is currently under review and we have a programme for preparing Conservation Area Appraisals and Management Plans (CAAMPs) for all our conservation areas. Haringey currently has 14 adopted appraisals which have been performing well, including 4 recently adopted in 2019. Work has also commenced on a further 7 appraisals: Trinity Gardens, Wood Green Common, Bowes Park, Muswell Hill, St Ann's, Lordship Lane and Clyde Circus Conservation Areas.

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

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

The Big Question



PL2. What should the New Local Plan strategy be for the conservation and enjoyment of the historic environment?

Things to consider:

What do you enjoy/ value about Haringey's historic environment?

How can we encourage developers, businesses and the public to invest in protecting and enhancing the historic environment?

How should the New Local Plan look to encourage more recognition of our diverse intangible cultural heritage in the built environment?

Should the New Local Plan provide more specific policy and guidance on areas, types of heritage assets and reducing carbon emissions?

Should we prepare a more detailed evidence base assessing local views to inform their protection?

What the New Local Plan should do?

Protecting and supporting our culture

Haringey's cultural offer enriches our lives, making the borough an exciting and engaging place to live, work and visit. Our list of cultural activities is immense and reflects the diversity of our community; from walking the historical grounds of Alexandra Palace and Park to dancing at the Wireless Festival in Finsbury Park, comedy nights at the King's Head pub, browsing food and crafts at the Tottenham Green Market, dining out on excellent Turkish food in Green Lanes, or discovering the legacy of the famous Jamaican politician whom the Marcus Garvey Centre is named for.

The night-time environment is an important part of our cultural offer that requires a strategic approach and good management. Night-time economic activities include eating, drinking, entertainment, shopping and spectator sports, as well as hospitality, cleaning, wholesale and distribution, transport and medical services, which employ a large number of workers.

Outcome 11 of the Borough Plan is for Haringey to be a culturally engaged place. From a planning perspective this means:

- Enabling the provision of spaces and facilities to support a range of events, from local markets to cultural festivals and music gigs
- Protecting and promoting the creative and cultural activities and infrastructure that enables people to gain skills and employment in the creative industries and brings investment into the borough
- Supporting and managing the development and diversification of the night-time economy in appropriate locations like town centres
- Everyone in the borough should be able to access, benefit from and contribute to our cultural offer

Food Festival



Blue House Yard - Creative Workspace



The current situation



The borough benefits from good cultural infrastructure, including:

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

Our venues and events are spread well across the borough meaning that there is good access to culture for residents. Many are located in town centres but there are also some within industrial estates and areas mostly made up of housing.

The existing Local Plan recognises the important role of these venues to community life. It includes a specific policy on public houses (DM50) to resist their loss.

Our cultural sector is facing some difficult challenges however. The past decade has seen a London-wide trend of cultural venues and spaces closing down. This includes a 25% reduction in the number of pubs, a 35% reduction in grassroots music venues and a 58% reduction in Lesbian, Gay, Bisexual and Transgender plus (LGBT+) venues. Rising rents and business rates are forcing many artists and small businesses to move out as cheap workspaces are converted to other uses.

There is an opportunity for the New Local Plan to support our cultural sector and take advantage of the economic and social benefits it provides. The creative industries make up one in six London jobs, and these have been growing at a rate four times faster than the economy as a whole. They are also more long-term sustainable jobs, with 87% at low risk of automation.

The creative industries can be a tool for regeneration, supporting skills training and employment.

As a diverse, well connected borough, with large areas of regeneration, Haringey is well placed to take advantage of this. In early 2020, South Tottenham became one of six London areas to be designated a Creative Enterprise Zone (CEZ) by the Mayor. The creative industries are now Tottenham's fastest growing sector, experiencing growth of 125% over the past five years and accounting for 4,400 jobs and 660 businesses.

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

A recent survey of town centre users in support of the Council's emerging Economic Development Strategy identified that there was a desire for more events and attractions within town centres such as more bars, pubs and clubs. In addition to these more traditional night-time economy uses, town centres could benefit from a broader range of night time cultural events and activities that cater to our broad and diverse resident population.

How the New Local Plan could help

The New Local Plan could support our cultural sector by:

- Protecting existing cultural venues, facilities and uses where appropriate and supporting the development of new cultural venues in town centres and places with good public transport connectivity
- Identifying and promoting new, or enhance existing, locally-distinct clusters of cultural facilities, venues and related uses defined as Cultural Quarters, especially where they can provide an anchor for local regeneration and town centre renewal
- Identifying, protecting and enhancing strategic clusters of cultural attractions
- Considering the use of vacant and poorly used properties and land for pop-ups or meanwhile uses for cultural and creative activities during the day and at night-time to stimulate vibrancy and viability and promote diversity in town centres, Cultural Quarters and other areas
- Seeking to ensure that Opportunity Areas and large-scale mixed-use developments include new cultural venues and/or facilities and spaces for outdoor cultural events
- Considering opportunities for developments to provide affordable workspace and/or co-working and flexible workspaces through developments and/or Section 106 agreements
- Supporting the development of Haringey's identified warehouse living areas as creative industries hubs
- Supporting the creation of new evening and night-time uses to create more activity in the early and late evening which make a place feel safer to walk around



Gathering Evidence

We are continually working to understand our cultural environment. The following documents contains some information on our cultural infrastructure and the creative industries:

- Haringey Economic Development Strategy: Economic Baseline- Final Evidence Report (2020)
- Wood Green Employment and Economy Space Study (2020)
- Tottenham Creative Enterprises Study (2017)
- Urban Character Study (2015)

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

The Big Question

PL3. How can we protect and enhance our culture and creative industries?

Things to consider:

What is unique or important to you when it comes to Haringey's cultural assets and activities?

What is preventing you from accessing or engaging with the borough's cultural assets and activities?

What kind of support, for example supporting the provision of affordable workspace, should the New Local Plan provide to our creative industries?

What kind of evening-time activities would you like to see more of in Haringey and where are the most appropriate locations for them?

How can the New Local Plan encourage the use of vacant and poorly-used properties and land for pop-ups or meanwhile uses? What are the negative effects that should be controlled?

Are there any new clusters of cultural facilities, venues and related uses that should be defined as Cultural Quarters such as within South Tottenham?

5.3.3. Climate change and sustainability

Addressing the climate emergency

What should the New Local Plan do?

Climate change is one of our biggest challenges and is already affecting our borough. Its impacts are particularly pronounced in an urban environment like Haringey, resulting in higher average temperatures, more frequent and intense heat waves, and more extreme rainfall, storms, and droughts. These events can cause damage to buildings and infrastructure, create, or exacerbate health problems for our residents, and result in higher energy and food costs.

Addressing the climate emergency is a matter of social justice and equality. This is because the effects of climate change will be felt hardest by our most vulnerable residents such as our less financially able, our children, the disabled and older persons.

For these reasons, and in acknowledgement that our current plans and actions are not enough to address this challenge, the Council declared a Climate Emergency in March 2019. It has produced a Draft Climate Change Action Plan (2020) with an ambition for the borough to be net zero carbon by 2041 and for the Council itself to be zero carbon in its core buildings and fleet by 2027.

The New Local Plan is an important tool for addressing the Climate Emergency by making sure that we:

- A) Reduce climate change by developing planning policies that support a radical reduction in greenhouse gas emissions
- B) Adapt to climate change by understanding its long-term implications on the borough and developing policies that help ensure the future resilience of our communities and infrastructure

The Climate Emergency affects all of us and everyone has a role to play in addressing it. This engagement is part of the Council's commitment to working collectively with our community and wider stakeholders in tackling this challenge.

Addressing the Climate Emergency cuts across all aspects of the New Local Plan. This section focuses on reducing climate emissions in the context of our buildings and waste management, as well as how we can adapt to climate change. Other key sections with particular relevance to climate change include transport and open spaces.





The current situation - Reducing our emissions

Haringey has one of the lowest annual emissions of carbon dioxide (CO2) per person amongst our neighbouring boroughs, at 2.5 tons of CO2 per person. This is much lower than the UK average of 4.5 tons per person. Half of Haringey's emissions (50%) come from the way we power and heat our homes. 24% of our emissions come from travel and 26% come from our businesses and industry.

We have made significant progress in reducing emissions. Between 2005 and 2017, Haringey's emissions decreased by 35.9%. We are working on creating District Energy Networks (DENs) in four areas; North Tottenham, Tottenham Hale, Broadwater Farm, and Wood Green. DENs facilitate greener, more affordable and more reliable heat than conventional heating systems by creating large heating systems that enable consumers to take advantage of heat technologies that only work at scale. The intention in Haringey is for the DENs to eventually supply homes with renewable energy for heat and power, generated from waste, through a new energy recovery facility at Edmonton EcoPark.

In addition to addressing emissions from transport and our buildings, we also need to consider the emissions generated by how we design, make and use products and food.

We need to transition to a 'low carbon circular economy'. That means an economy where materials are retained in use at their highest value for as long as possible before being re-used or recycled leaving only a minimum of remaining waste. By moving to a less wasteful economy our businesses will not only be more resource efficient but also reduce the carbon emissions caused through the production of resources.

The North London Waste Authority (NLWA) is the responsible authority for the disposal and treatment of waste generated in Haringey. The NLWA monitors progress across North London in meeting its goals for sustainable waste management. Between 2015/16 and 2018/19, the percentage of waste being sent to landfill improved from 13% to 8.5%. Between 2006/7 and 2018/19 the percentage of household waste being recycled or composted improved dramatically from 21% to 30.2%. However, despite these improvements the London Plan forecasts that overall household, commercial and industrial waste in Haringey will increase from 190,000 to 201,000 tonnes between 2021 and 2041.

NORTH LONDON WASTE AUTHOR TY



How the New Local Plan could help

Reducing emissions from energy use in our buildings

The existing Local Plan (2017) requires all new development to be net zero carbon. We propose keeping this target and supporting it with a more comprehensive and ambitious set of policies designed to promote net zero on-site. We want your input on how the New Local Plan can encourage a wider range of developments to meet this target, reducing emissions as much as possible on or near site.

For the purposes of the existing Local Plan, net zero refers to a building that reduces regulated emissions by 100% when compared with a hypothetical similar building that meets building regulation requirements. Regulated emissions are those linked to the basic energy usage of a building i.e. heating rooms, lighting, hot water heating. Unregulated building emissions depend on who uses the building and can make up to 50% of the total operational emissions, and include for example the energy used by laptops, cooking, and fridges. Developers have less control over end-user emissions and they can be more difficult to calculate because they may change throughout the long-term use of a building.

The current Local Plan also requires all development to prioritise connecting to DENs, and, where viable, reduce their CO2 emissions by 20% through use of on-site renewable energy like solar panels or local sources of renewable energy.

The London Plan contains an energy hierarchy which sets out the different stages where we can reduce regulated emissions from our buildings beyond what is already required as a minimum to comply with building regulations.

- **Be Lean:** The starting point is to reduce our energy demand in the first place to avoid the carbon it takes to produce it. One way this can be done is by designing buildings so that they use the (free and clean) sun's energy for heat and allow for natural ventilation to prevent over-heating. Another way is by using building materials that provide better insulation. Lower energy use will mean savings in energy bills, making a big difference to those who are struggling financially

- **Be Clean:** Next we should see if there are more efficient and lower carbon ways of providing heat and power to our buildings. In Haringey, there is a big opportunity to use DENs to help with this. Sharing an energy network with lots of other buildings is not just greener and more affordable, it also means it will be cheaper and easier in the future to swap out existing energy systems for lower carbon ones once they become viable because we won't have to swap out equipment in each individual building

- **Be Green:** Once we've tried to reduce our energy demands and ensure we are providing it in the most clean and efficient way, we should then consider if there are ways to generate renewable energy on the site, for example through the use of solar panels

- **Offsetting:** After we have used the above methods to reduce emissions as much as possible, developers need to 'offset' or 'make up for' the remaining regulated carbon emissions that the building will produce. Offsetting is usually in the form of a payment per tonne of carbon emitted, however, it can also be provided in-kind. For example, a developer could instead agree to retrofit a local school with solar panels to offset their emissions. Haringey currently charges £95/tonne/year over a 30-year period. This money is then used to support local programmes that help to reduce carbon i.e. retrofitting existing homes with cleaner energy systems

- **Be Seen:** Finally, it is important that we monitor and report back on whether our buildings are as energy efficient as predicted. Gathering this information will help to inform the development of future policy. Installing smart meters in individual homes and non-domestic buildings can also help users better understand their energy usage and make changes to reduce their use, saving money

The big question is what should the New Local Plan do to reduce emissions? Our current projections indicate that new developments need to be much better at reducing their emissions and existing buildings need to be retrofitted at a large scale to meet the borough's climate change targets by 2041.

Below are some key challenges we are facing in reducing carbon emissions from buildings and some ways in which we could address them. These are just for discussion and no decisions have been made yet.

We also need to consider the implications of more ambitious policies. Ambitious policies will encourage the building industry to upskill, attract funding and do things more efficiently. However, they can also add additional cost to developments which could either mean that they become unviable and we lose out on the other benefits they would bring, or we might have to trade off policy objectives against each other.

The Council will need to be conscious of Government proposals to bring in a new Future Homes Standard which will increase the energy efficiency requirements for new homes but may limit the ability of local authorities to set higher local standards for energy efficiency in residential buildings.

A) Achieving more on or near site carbon emission reductions



The London Plan requires at least 35% of the carbon reductions (beyond Building Regulation requirements) to be achieved on site and/or near site (i.e. from Be Lean, Clean and Green). This should be a minimum, with a target to reduce 100% of the emissions, but in practice most applications do not seek to go any further and look to make up the remaining 65% by paying an offset.

This raises two problems:

- 1) It means our buildings are not as clean or efficient as they could be, are still emitting carbon, and will need to be retrofitted in the next ten years
- 2) The money paid as an offset does not cover the true costs of offsetting. This is outlined in greater detail in the report 'Towards Net Zero Carbon: Achieving greater carbon reductions on site (2020)'

Tools to address this problem include:

- 1) Raising the cost of offsetting from the current £95/tonne/year to encourage developers to make improvements to the buildings – our evidence base report suggests a tiered approach to offsetting (see our 'Towards Net Zero Carbon report' for more detail)
- 2) Raising the 35% target in Haringey to require cleaner more energy efficient buildings. The 'Towards Net Zero Carbon' states that 60% of residential emissions reductions and 50% of non-residential emissions reductions can be easily achieved on or near site
- 3) Require a higher proportion of low carbon and renewable energy to be provided on site and/or near site
- 4) Encouraging local in-kind offsetting rather than cash contributions

B) Addressing the 'hidden' carbon emissions



The net zero carbon target only focuses on regulated carbon emissions. The New Local Plan could look ways to reduce unregulated emissions and/or improve our understanding of them.

The net zero carbon target also does not consider the carbon emissions generated across a building's entire lifespan, the 'embodied carbon' of a building. For example, emissions are generated when producing building materials and transporting these, which both contribute to what is called the 'embodied carbon' of a building. We should also be thinking about the emissions created when a building is demolished and the extent to which materials can be reused or recycled.

The London Plan currently requires developers to calculate and minimise unregulated carbon for major developments (i.e. more than 10 dwellings) and for larger developments that are referable to the Mayor, this includes an assessment of carbon emissions across a development's whole life. The New Local Plan could go further in its requirements for developers to provide this information and minimise emissions.

C) Reducing emissions from all planning applications



The London Plan focuses on achieving emissions reductions from major development, however, a lot of new development in Haringey is expected to occur on smaller sites and through changes in use, refurbishments, and extensions to existing buildings.

The New Local Plan will need to consider the expectations for emissions reductions for these development activities. Some of these sites will be in the Conservation Areas that cover around a quarter of Haringey or affect buildings that are locally or statutorily listed. Planning policies will need to find a way of encouraging improvements that reduce carbon emissions while preserving heritage attributes.

D) Allocating large-scale renewable energy generation sites



Haringey generates one of the lowest amounts of renewable energy in London. Large-scale generation of solar, wind or other renewable energy will help Haringey meet its climate emergency target and will help decarbonise the national grid. The New Local Plan will need to consider updating previous evidence and feasibility studies of potential sites.

E) Measuring emissions



Current software does not adequately predict how much energy may be used once the building is in use - this is called the performance gap. The New Local Plan should investigate opportunities to reduce the performance gap.

Minimising waste and reducing emissions from resource use

The planning framework for waste management in North London boroughs is primarily set out in the North London Waste Plan (NLWP). This document identifies sites for waste management use and includes policies for determining waste planning applications. The New Local Plan still has a role to play in reducing waste and emissions by setting expectations on how new developments should be designed.

To support waste reduction and a transition to a 'low carbon circular economy' the London Plan requires all large applications referred to it to provide a 'Circular Economy Statement' which demonstrates how the proposed development will minimise waste over its entire lifespan. This includes minimising the amount of resources used to construct it and demolish it; ensuring it is designed to support reuse/ recycling and composting; and designing the development to be adaptable and flexible so that it can be useful for as long as possible.

Through the New Local Plan, the Council could consider whether it should require circular economy statements, or something similar, for smaller applications.



Gathering Evidence



We've done a lot of work in recent years to understand our climate change emissions and how we can reduce them, and have produced the following reports:

- Annual Carbon Reports
- Carbon Reduction Scenarios Technical Report (2007)
- Climate Change, Site Development & Energy Infrastructure Study (2010)
- Energy Masterplan (2016)
- Zero by 2050: A Manifesto to Deliver Sustainable Regeneration in Haringey (2017)
- Zero Carbon Haringey: Direction of Travel (2018)
- Zero Carbon Haringey: Stage 1 Technical Report (2018)
- Stage 2 Report Climate Action Haringey: Towards a zero carbon future (2019)
- Haringey Climate Emergency Scenario Report (2019)
- Towards Net Zero Carbon: Achieving greater carbon reductions on site (2020)

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

We also encourage you to read and provide your feedback on the report 'Towards Net Zero Carbon: Achieving greater carbon reductions on site (2020)'. This proposes a tiered carbon offset contribution approach of £100-£1,000 per tonne of carbon.

The Big Question



PL4. How should the New Local Plan support the reduction carbon emissions in Haringey?

Things to consider:

How can we make sure carbon offsetting is a last resort not a first resort, and that developers maximise meaningful on-site or near site emission reductions?

Should the New Local Plan address the 'hidden' unregulated carbon emissions and emissions generated over a building's whole life? If so how? If not, then where should this issue be addressed?

How should the New Local Plan focus more on reducing emissions on smaller sites, refurbishments, changes of use, and extensions and heritage buildings?

What additional evidence is needed to help inform the New Local Plan? What do you think of the evidence and suggestions put forward in 'Towards Net Zero Carbon: Achieving greater carbon reductions on site (2020)'?

What challenges/ opportunities have we missed?

The current situation - Adapting to climate change

Flood and water management

Climate change is increasing the risk of more frequent and severe flooding in Haringey. Haringey has a number of watercourses, including the River Lee, Pymmes Brook and Moselle Brook, which contribute to our flood risk. According to the Environment Agency, approximately 9% of land in Haringey has a 1 in 100 year probability of flooding from rivers. Haringey's Flood Zones are largely concentrated in the east of the borough, in the River Lee flood plain.

Haringey's Strategic Flood Risk Assessment (2015) has identified surface water run-off as the greatest risk to the borough with regard to flooding. Hard surfaces, like pavements and roofs, prevent rainwater from soaking into the ground. Haringey is built on a layer of London Clay which makes drainage of excess water more difficult. The results can range from inconvenient puddles to severe surface water flooding. If rainfall overwhelms our sewer system, it can flood areas and pollute water systems.

As London becomes further urbanised and additional hard surfaces are instated, more rainwater is diverted to the drainage, stormwater and sewage systems. This places additional pressure on those systems and has implications for groundwater levels. The Surface Water Management Plan (SWMP) (2011) identifies 9 Critical Drainage Areas in the borough where there are known flooding problems. The current Local Plan contains specific policies to address flood risk in these areas.

The Council published Local Sustainable Drainage Systems (SuDS) Standards in December 2015, SuDS Design Requirements for Lead Local Flood Authority (LLFA) Technical Assessment in May 2016 and a SuDS Drainage Design & Evaluation Guide in March 2018. The Council also has an adopted Local Flood Risk Management Strategy (2019) as per the Council's statutory role as LLFA.

Droughts

Another impact of changes in rainwater and storm patterns is the risk of droughts. Longer periods without rain and heat waves increase the pressure on water use. And, due to poor drainage during rain events, water is diverted away from groundwater sources so these are getting harder to be refilled for dry periods. New developments should use drinking water sparingly and more intelligently.

Overheating

The summer of 2018 was the equal-warmest summer in the UK, along with 2006, 2003 and 1976. Climate change has already increased the chance of seeing a summer as hot as 2018 to between 12-25%. In 2019, a new official record of the highest temperature in the UK was measured, at 38.7°C. With future warming, hot summers by mid-century could become even more common, near to 50%.

In managing heat risk, new developments in Haringey face two challenges:

- The need to ensure the borough does not overheat (the urban heat island effect); and
- The need to ensure that individual buildings do not overheat

The urban heat island effect is caused by an extensive built up area absorbing and retaining heat during the day and night leading to parts of the city being several degrees warmer than the surrounding area. These circumstances can lead many people to feel too hot or not be able to sleep, but for those with certain health conditions, and 'at risk' groups such as some young or elderly Londoners, the effects can be serious and worsen health conditions.

How the New Local Plan could help

Flood and water management



As part of preparing our New Local Plan we will update our Strategic Flood Risk Assessment to take into account new national and regional guidance and policy and up-to-date data on the local environment and climate change projections. This will ensure we can make informed decisions on where growth should occur to minimise flood risks.

Implementing sustainable drainage principles and infrastructure in existing and new development will help to reduce surface water run-off and improve water quality. Sustainable drainage measures (often known as SuDS) try to mimic natural drainage as much as possible. They can perform several different functions:

- Reduce the amount of rainwater that will reach the drainage system
- Slow water down to give the drainage system time to empty
- Re-using rainwater, for example, for irrigation or toilet flushing
- Filter rainwater of pollution
- A combination of these functions

Sustainable drainage measures often include features such as 'rain gardens' that collect run-off from adjacent roads, meadow style planning and new

tree planting which have an added benefit of creating green and attractive urban environments. Haringey has been a leader in this area and has invested in sustainable drainage improvements in Crescent Garden and Victoria Crescent which are seen as exemplars for the rest of London.

Both the London Plan and current Local Plan set requirements for the implementation of sustainable drainage measures. The New Local Plan could consider setting a more comprehensive policy framework for these measures to support greater implementation.

Overheating



Green infrastructure such as parks, trees, green roofs and sustainable drainage systems can help to mitigate the urban heat island effect by shading roof surfaces and through the evaporation of water from soils and leaves (evapotranspiration) which can help to cool the surrounding air. The current Local Plan expects all new development to consider ways reduce the potential for overheating in buildings and reduce reliance on air conditioning systems. The London Plan requires major developments to demonstrate this through an energy strategy.

The New Local Plan could go further and expand requirements for an energy strategy beyond just major developments or look at additional ways to encourage consideration of overheating.

Gathering Evidence

We are continually working to understand how climate change impacts us and how we can adapt to it. We produced the following reports and are in the process of updating the Strategic Flood Risk Assessment.

- Strategic Flood Risk Assessment (2015)
- Surface Water Management Plan (2011)
- Multi-Agency Flood Plan (2012)

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

The Big Question

PL5. How should the New Local Plan support Haringey to adapt to climate change?

Things to consider:

How can the New Local Plan encourage greater implementation of sustainable drainage systems?

How can New Local Plan encourage more developments to consider ways to reduce potential overheating in buildings and reduce reliance on air conditioning systems?

5.3.4. Green infrastructure and natural environment

What should the New Local Plan do?

Enhance and protect biodiversity and open spaces

Given the urban nature of much of Haringey it is vitally important that we protect and enhance our green infrastructure and natural environment. The New Local Plan will ensure that public open spaces such as parks, amenity spaces and commons continue to be protected and improved, and promote opportunities for new accessible open spaces.

There are areas of Green Belt and Metropolitan Open Land within Haringey. These are key open space designations which are given significant protection in both the London Plan and the National Planning Policy Framework. The New Local Plan will confirm their extent and the protections which apply to them. Their boundaries may only be amended through a Local Plan. As part of the process of preparing the New Local Plan we may review the boundaries of designated areas of Green Belt and Metropolitan Open Land to assess whether they remain appropriate in line with national planning policy and the London Plan.

As part of the New Local Plan we will identify, map and safeguard local wildlife-rich habitats and wider ecological networks. This will be aided by a new Biodiversity Action Plan and Parks and Green Spaces Strategy. The Local Plan will seek to promote the conservation, restoration and enhancement of our important wildlife habitats and ensure that new development does not interfere with the protection and recovery of priority species. It will also identify and pursue opportunities to achieve net gains for biodiversity and an increase in urban greening on new development.

The borough's green infrastructure also has a crucial important role to play in helping with climate change mitigation and adaptation. Trees in particular play an important role in carbon capture and storage, preventing flooding, reducing pollution and reducing city temperature.

The current situation

The borough has a total of 60 areas designated as Sites of Importance for Nature Conservation (SINCs), which vary in terms of importance/sensitivity. Haringey also has five Local Nature Reserves (LNRs) and waterways also offer a valuable habitat.

The Lee Valley Regional Park straddles the eastern boundary of the borough and is home to European designated sites and is a Site of Special Scientific Interest.

With regards to recreational open space, there are 35 public parks and open spaces in the Borough, including historic spaces such as Queens Wood and the renowned Alexandra Palace park. These accommodate the majority of the borough's 91 playing pitches for cricket, football, rugby league and rugby union. However in certain wards such as Bruce Grove there is limited access to open space and recreational grounds. The Lee Valley presents a significant recreational asset, which with better access to it, could serve a much wider section of our community including those areas in the east of the borough with deficiencies in access to open spaces.

Haringey also has a network of Metropolitan Open Land and Significant Local Open Land. The borough has an overall provision of 1.7 ha of open space per 1,000 of population, although there are some areas of deficiency particularly in the east of the borough. It will therefore be important in areas of deficiency to secure additional open space.



KEY

Green Infrastructure

- Open space
- Local Nature Reserve
- Lee Valley Regional Park
- Ecological Corridor
- Public Green Spaces
- Green Spaces
- Significant Open Land
- Metropolitan Open Land
- Green Belt

Other

- Green Grid

How the New Local Plan could help

Our existing Local Plan requires that all new development protects and improves Haringey's parks and open spaces. We propose that the New Local Plan will continue this approach. The existing Local Plan also seeks to protect and enhance biodiversity at designated and non-designated sites. This approach will be continued with an emphasis on achieving net gains. There is scope to link and enhance habitats and wildlife corridors which could be made possible by new development within the vicinity of these. Importantly the New Local Plan could also provide opportunities for people to access wildlife and diverse open green spaces through policies to enhance cycling and walking routes, and through further establishing green links between existing open spaces. Incorporating policies that require a net gain in biodiversity on new developments will also help in this.

As a starting point, the New Local Plan must ensure existing public open space is of the highest quality and easy to access and use.. It is important that existing spaces have high quality amenities such as surfaces and lighting as well as play and sports infrastructure. Promoting opportunities to develop an interlinked network of green infrastructure and open spaces that connect with town centres, public transport nodes, employment and residential areas will be explored. The New Local Plan will consider the potential to designate new sites as Local Nature Reserves including The Paddock in Tottenham Hale.

Given the highly developed nature of much of the borough, it is challenging to increase the quantity of public open space in Haringey, especially for things like new recreation grounds or large parks. The New Local Plan will explore in detail whether it is possible to deliver additional open space in areas with existing deficiencies, particularly in the east of the borough. Providing new open space in identified areas of deficiency is necessary to address health inequality issues and outcomes as well as contributing to carbon reduction, mitigating climate change, addressing overheating and providing solutions to the challenges of flood management.

The need for additional open space has been highlighted and made even more urgent by the significantly increased use of parks arising from the COVID-19 lockdown.

As a minimum, the New Local Plan will include policies that would require new developments, particularly in areas of deficiency to provide new public open space or contribute to improving the capacity of nearby recreational facilities to ensure existing deficiencies are not made worse by an increasing population. This will likely be in the form of pocket parks and amenity spaces, and opportunities to connect these through urban greening and additional tree planting and planted public realm initiatives, which can also help improve biodiversity, will be explored. It is our aim that existing networks of open spaces should be enhanced, and linkages to them improved, so that the borough's growing population can better access and utilise the existing open space assets within the borough. A key focus for improvements will be the borough's town centres which suffer from lack of open space in many cases and would also benefit from improved links to existing parks.

Whilst it is our clear aim to ensure there is no net loss of open space, the New Local Plan could potentially enable the reconfiguration of open space such as Metropolitan Open Land to enable targeted improvements to be made to the open space resource in those parts of the borough where there are currently deficiencies. A policy approach such as this could allow the quality of open space, in terms of its potential to support recreational activity and other typical open space uses, to improve, alongside the potential improvements to biodiversity through new appropriate planting and greening. A policy of enabling reconfiguration may involve a change to the existing character of the open space.

The New Local Plan will also be able to set a local Urban Greening Factor, which will apply to new developments and will be achieved through measures such as high quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

In addition to protecting allotments, the New Local Plan can provide further support for sustainable food growing in the borough. There is the opportunity to secure increased allotment space as well as to encourage urban farming, hydroponic farming and rooftop farming, which can supply food, improve the environment and create jobs.

Gathering Evidence



We have existing studies that inform current policies relating to biodiversity and open space, but it is intended that these are updated and expanded upon to ensure we have a robust set of evidence to enable us to protect and enhance the natural environment.

- Open Space and Biodiversity Study (LUC) (Oct 2014)
- Haringey Physical Activity and Sport Strategy 2019-2023

New studies to be undertaken

- Parks and Green Spaces Strategy
- Biodiversity Action Plan
- Trees and Woodland Plan
- Asset Management Plan
- Watercourse and Flood Risk Management Plan
- Natural Capital Account
- Health Strategy
- Accessibility Study
- Funding Plan

The Big Question



PL6. How can the New Local Plan provide additional open space in areas of deficiency to address health inequalities?

Things to consider:

How should the New Local Plan help ensure new developments achieve a net gain in biodiversity?

How best can we encourage urban greening? What measures should particularly be encouraged in Haringey?

Are there any sites with biodiversity value and unique habitats you are aware of that we may not be?

Do you support the Council reviewing boundaries of designated areas of Green Belt and Metropolitan Open Land to assess whether they remain appropriate in line with national planning policy and the London Plan?

Should the New Local Plan allow for the reconfiguration of open space for site development proposals, where there would be no net loss of open space provision or in quality and accessibility?

What additional evidence is needed to help inform the New Local Plan?

5.3.5. Social infrastructure: play and recreation

What should the New Local Plan do?

Delivering high quality play and recreation facilities across our borough is a fundamental priority. They are vital to maintaining and improving quality of life for our residents, children and creating great places, and make a major contribution to active, vibrant and engaged communities.

The New Local Plan should set out clear expectations for how new development should contribute to play and recreation provision in the borough ensuring that this key social infrastructure is provided to support future growth. It is essential that the New Local Plan contributes to places where people can live, work and play within their neighbourhoods. Facilities must be accessible, attractive and inclusive, in particular meeting the needs of children and younger residents.

The current situation

The borough has more than 600 acres of parks, recreation grounds and open spaces which make a vital contribution to play and recreation. Across Haringey there are just over 100 play areas in parks and open spaces, on housing estates and provided through voluntary sector organisations.

The borough has a young and growing population therefore it is key that play and recreation facilities are protected and enhanced to meet needs, especially of children and young people.

A recent audit of play space in the borough against the Mayor's standard of 10m2 per child of play provision identified that the following wards have the greatest deficiency (in order of its extent): Bruce Grove, Northumberland Park, Fortis Green, White Hart Lane, Tottenham Green, Tottenham Hale, Muswell Hill, Noel Park, Bounds Green, Crouch End, Woodside, Hornsey, St Ann's.



The existing Local Plan protects the borough's parks and open spaces and seeks to increase access in areas deficient in open space and recreation grounds and facilities. It requires that new development protects and enhances existing play spaces and makes provision for children's play space in addition to providing amenity space.

The London Plan has a policy on play and recreation which requires development proposals for schemes that are likely to be used by children and young people to increase opportunities for play and informal recreation and enable children and young people to be independently mobile and for residential developments, incorporate good-quality, accessible play provision for all ages with at least 10m2 of play space provided per child.

The London Plan also has a policy on sports and recreation facilities which seeks to ensure boroughs have a sufficient supply of good quality sports and recreation facilities.

How the New Local Plan could help

The London Plan and Mayor's guidance sets out a robust policy framework for play and recreation facilities. The New Local Plan could however help provide a policy approach which more accurately reflect local needs for these types of social infrastructure.

The New Local Plan will:

- Protect and enhance existing play and recreation facilities that meet the needs of residents
- Require the delivery of new and improved play and recreation facilities to meet the needs generated by new development
- Address identified deficiencies and assist in improving quality, play value and access
- Support high-quality residential development that contributes positively to amenity, play space, high quality public realm including cycling, walking and sustainable public transport, in accordance with 'Healthy Streets' and 'Good Growth' initiatives, and enhances local character and vitality of a place

Gathering Evidence

The Council's current evidence relating to play and recreation in the borough is as follows:

- Haringey Physical Activity and Sport Strategy 2019-2023
- Outdoor Sports and Play Facilities Framework 2016-2026
- Playing Pitch Strategy 2016-2026
- Indoor Sports Facility Needs Assessment and Strategy 2018-2028

We will update key parts of this evidence base as part of process of preparing the New Local Plan.

The Big Question

PL7. How can the New Local Plan support the delivery of play and recreation facilities?

Things to consider:

How can the New Local Plan best meet the social and recreation needs of specific user groups, including children?

What play and recreation infrastructure do you think is necessary to support growth in the New Local Plan and reduce health inequalities?

5.3.6. Transport

What should the New Local Plan do?

Our transport system helps to shape the character of Haringey and its residents' everyday lives. It connects us with friends and family, our schools and workplaces, and the many unique neighbourhoods and activities Haringey and London has to offer. The Council's ambition is to make walking, cycling and the use of public transport a first choice for all. Access to a high quality and sustainable transport system is a matter of social justice and equality. We need to provide safe, accessible, and affordable walking, cycling and public transport options to allow residents who do not own a car or struggle to afford fares to fully engage with society and access opportunities. Similarly, a fair transport system should ensure equal access for those with mobility issues.

Our transport system has key role to play in addressing some of the borough's biggest challenges.

The climate emergency

Currently 18% of Haringey's carbon emissions are from road-based motor transport. Our overall transport emissions have decreased by 23.3% since 2005, however, much more needs to be done if we are to reach our target of being a Net Zero Carbon borough by 2041. To get to our Net Zero target, the Draft Climate Change Action Plan indicates that annual transport-related emissions will need to decrease from 127,637,566 kilo tons of carbon dioxide in 2015, to 3,808,360 kilo tons by 2041. The best way of doing this is by reducing our reliance on the motor vehicle and instead opting to walk, cycle or use public transport.

Delivering more affordable homes and access to jobs

Improving access and movement, particularly for sustainable modes, will help us to accommodate the housing and employment growth required to meet local need. Haringey has a limited amount of land that can be developed. It is important development of these sites is optimised by providing good connections to existing and future public transport, walking and cycling networks that support a higher density mix of land uses.



Wood Green Tube Station



Cycling in Wood Green

Our transport strategy

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

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

- Outcome 1: A public transport network that is better connected, has greater and more efficient capacity and is more accessible, supporting our growth ambitions
- Outcome 2: Active travel the default choice, with more people choosing to travel by walking or cycling
- Outcome 3: An improved air quality and a reduction in carbon emissions from transport
- Outcome 4: A well maintained road network that is less congested and safer

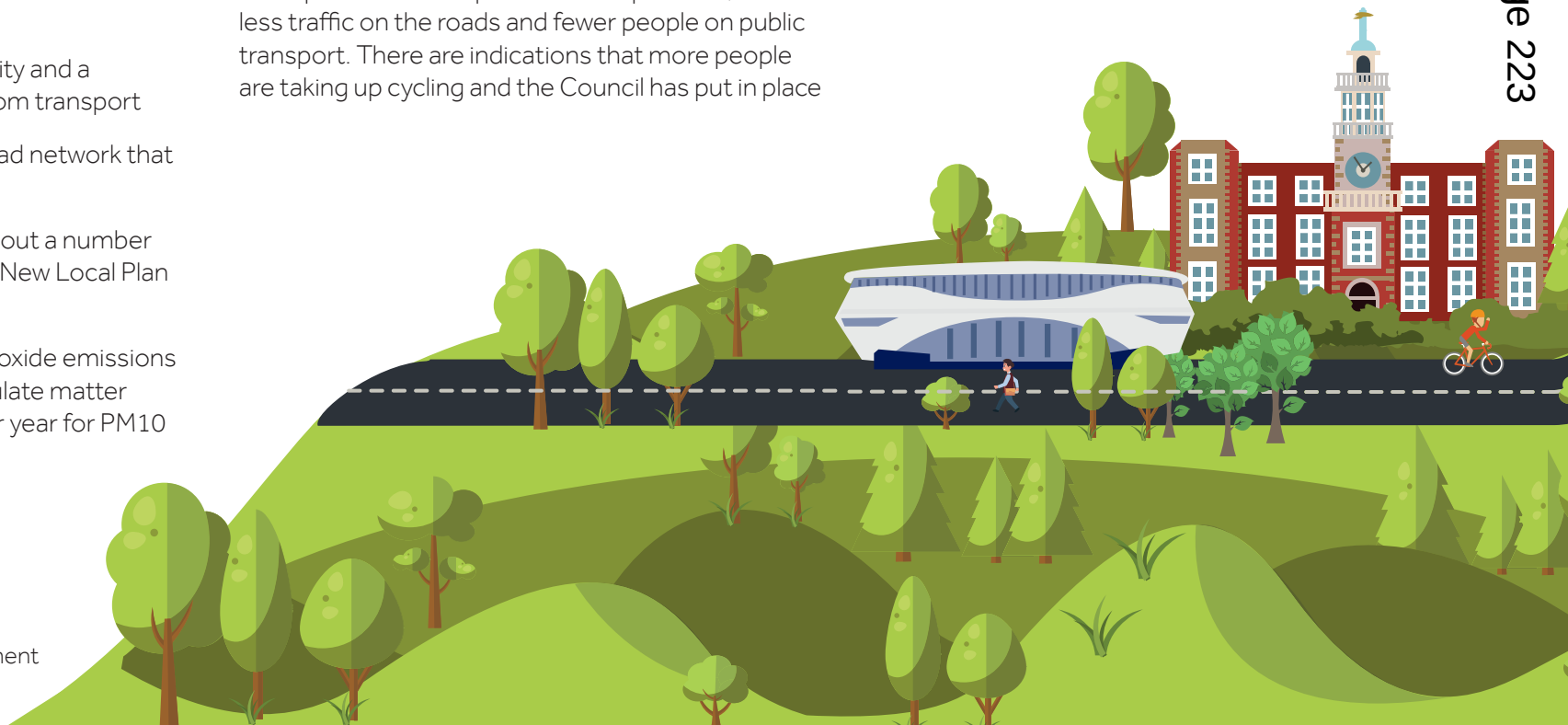
The Mayor's Transport Strategy sets out a number of Haringey specific targets that the New Local Plan should help deliver, these include:

- Significantly reducing nitrogen dioxide emissions to 20 tonnes per year and particulate matter emissions to 19 and 2 tonnes per year for PM10 and PM2.5 respectively
- At least 88% of daily journeys will include walking, cycling and public transport
- At least 70% of residents do at least 20 minutes of active travel every day by 2041
- No deaths or serious injuries on the transport network
- Reduce step-free journey time by 75% by 2041 based on 2015 levels

Impact of COVID-19

The COVID-19 pandemic and associated lockdown had a pronounced impact on travel patterns, with less traffic on the roads and fewer people on public transport. There are indications that more people are taking up cycling and the Council has put in place temporary cycleways and improvements to support this through its Streetspace Plans. It is also likely that Haringey will have experienced reductions in air pollution and carbon emissions.

The New Local Plan will cover a 15-year time period. Although there remains much uncertainty over the implications of COVID-19 for the long term, there are indications that the COVID-19 crisis will fast track existing trends, such as a move to more flexible home working and increased online shopping. There is also an opportunity to encourage a more permanent uptake in walking and cycling.



The 'Healthy Streets Approach'

A new type of thinking is required to meet these outcomes and targets. The Mayor has put together a 'Healthy Streets Approach' which provides a framework for putting human health and experience at the heart of planning the city.

The New Local Plan should look to promote and demonstrate the application of the Mayor's Healthy Streets Approach to: improve health and reduce health inequalities; reduce car dominance, ownership and use, road danger, severance, vehicle emissions and noise; increase walking, cycling and public transport use; improve street safety, comfort, convenience and amenity; and support these outcomes through sensitively designed freight facilities. Many of the borough's town centres are intersected by key transport routes and a key challenge will be applying a health streets approach to these places to make them more attractive whilst still allowing for movement of vehicles.



The Air Quality Action Plan 2019 identifies road transport as the biggest source of air pollution in the borough. Haringey is identified as an Air Quality Management Area and continues to face widespread exceedances of nitrogen dioxide (NO_2) emissions, particularly along busy congested roads.

Local Plan policies will need to encourage cleaner transport choices, and reduce human exposure to air pollution, particularly for vulnerable people.

The A1, the East Coast Mainline, the A10 and the River Lea can be challenging to cross, particularly for vulnerable users. For example, the East Coast Mainline can be crossed in only six places along its 5.7km length through the borough by vehicles, with another four crossings available for pedestrians and cyclists only.

People are less likely to walk or cycle if they feel unsafe. This includes having concerns about violent crime, bike theft, and fear of traffic.

- In 2016, pedestrians accounted for 35% of those killed and serious injured on London's streets
- 22% of people who don't cycle are put off it by fear of having their cycle stolen
- 46% of all Londoners are put off cycling to due fear of collisions

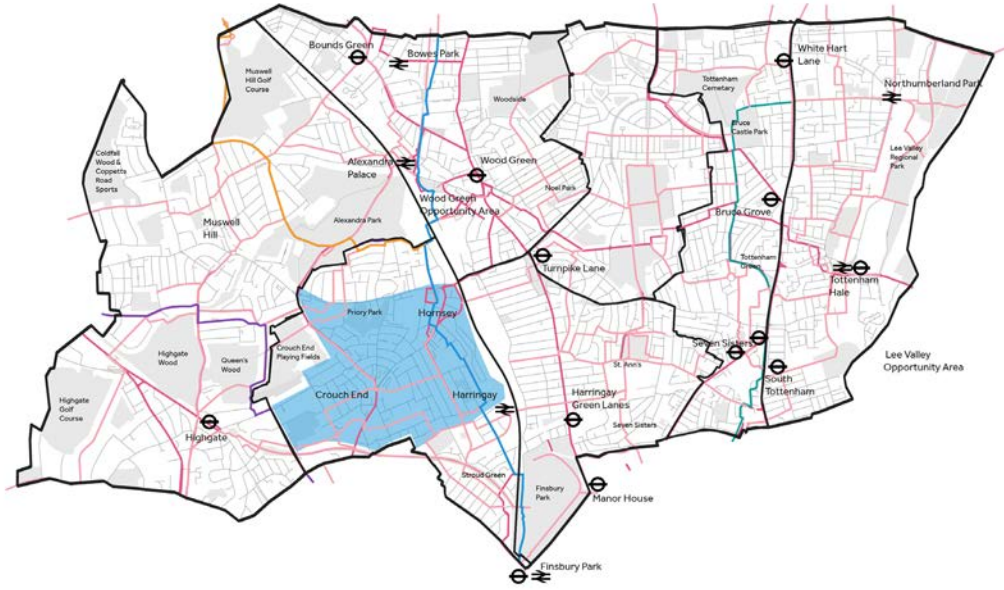


KEY

Underground and Overground networks
- Victoria line
- Northern line
- Overground line

Parking
- Controlled Parking Zone (CPZ)

Crossrail 2
- Central core of route
- Option via Wood Green
- Option via Turnpike Lane and Alexandra Palace
- Regional branches
- Bus routes
- Green Grid (proposed)



KEY

Cycle routes

Quietways
- North Finchley to Hornsey
- Farringdon to Bowes Park
- Camden to Tottenham Hale

- Cycle Syperhighway (CS1)
- Cycle Lanes
- National Cycle Strategy

Other
- Crouch End Liveable Neighbourhood

How the New Local Plan could help

Active travel



There is a big opportunity for us to take advantage of recent infrastructure investments, a change in attitudes towards walking and cycling due to COVID-19, and changes in travel technology such as e-bikes, cargo bikes and cycling apps, to enable Haringey to become a borough with a reputation for walking and cycling. There is great potential in Haringey to increase walking and cycling rates, particularly for shorter trips and for the first and last mile of journeys involving public transport.

Transport for London (TfL) and the Council are working together to improve Haringey's cycling and walking infrastructure and implement the 'Healthy Streets Approach'. One example of this is the Liveable Crouch End project. This is part of TFL's 'Liveable Neighbourhoods' scheme which aims to encourage walking, cycling and the use of public transport for residents, businesses and visitors, as well as improving health and air quality and reducing car trips.

The Cycle Superhighway 1, connecting North Tottenham to Liverpool Street, was completed in 2016 and TfL is looking to create new routes from Camden to Tottenham Hale; from Farringdon, through Haringey, to Bowes Park; and a Quietway from North Finchley to Hornsey.

The Council is also working on a Walking and Cycling Action Plan which will set out a strategy for improving active travel across the borough. This includes setting out a local walking and cycling network and identifying the infrastructure required to support it. The Action Plan will look at ways to integrate with the Haringey Green Grid, set out in the current Local Plan.

The level of investment and change going into our regeneration areas of Wood Green and Tottenham provide an opportunity to dramatically improve the walking and cycling network in these areas.

The New Local Plan could support active travel by:

- Identifying opportunities to improve the balance of space given to people to dwell, walk, cycle, and travel on public transport and in essential vehicles, so space is used more efficiently, and streets are greener and more pleasant
- Continuing to improve and enhance the design of new streets and walking/ cycle networks. For example, new street design should integrate facilities such as pocket parks, public cycle parking, and generous and safe crossings which prioritise people over cars
- Requiring new developments to connect to the pedestrian/cycle network and Haringey Green Grid and contribute to its implementation through Section 106 agreements
- Supporting the creation of links between walkways and to town centres, public transport infrastructure, healthcare facilities, schools, and green spaces, where appropriate. Identifying key linkages in site allocations
- Planning for new and improved walking, cycling and public transport networks in the Wood Green and Tottenham opportunity areas and other new key growth areas
- Supporting implementation of the School Streets programme where relevant to new development
- Providing new walkways which are accessible, inclusive, and safe within and through sites
- Providing segregated cycling routes throughout the borough, particularly on key movement routes
- Ensuring the provision and maintenance of convenient, safe and accessible supporting cycling infrastructure such as cycle parking and changing and showering facilities for workplaces, where appropriate
- Expecting development proposals to contribute to securing cycle infrastructure
- Requiring developments to include measures to design out crime

Public Transport Network



Haringey benefits from good radial public transport links connecting the borough with Central London. It has stations on three London Underground lines; the Northern, Piccadilly and Victoria lines, as well as being served by London Overground and National Rail services. Public transport accounted for 36.95% of all trips in 2017, up from 28.1% in 2000.

Recent improvements to the public transport network include upgrades to the Northumberland Park and Tottenham Hale Stations, improvements to frequency and reliability and three tracking of the West Anglia Main Line, and electrification of the Barking Gospel line.

Nearly all rail and underground stations offer interchange with local bus services while Muswell Hill is an important bus to bus interchange. Finsbury Park, Tottenham Hale and Seven Sisters/ South Tottenham are identified as key strategic interchanges in the Mayor's Transport Strategy

Although funding is uncertain, Crossrail 2 provides an opportunity for a huge uplift in public transport accessibility to support the delivery of new homes. The proposed route includes potential stations at Northumberland Park, Tottenham Hale, Alexandra Palace, Turnpike Land, Wood Green and Seven Sisters.

Key challenges for Haringey's public transport system include:

- Limited orbital links around London, as opposed to into Central London. The only existing orbital rail route is the Barking – Gospel Oak Overground line
- Overcrowding, particularly at peak times on the Victoria and Piccadilly lines from Finsbury Park to Central London and on the Barking Gospel Oak line
- A limited rail infrastructure and low public transport accessibility in the west of the borough, with only one underground station serving the area west of the central East Coast Main Line. This is reflected in greater car and van ownership in the west
- Large parts of Haringey rely heavily on the bus network. The reliability of buses is affected by congestion on the road network, particularly in peak hours
- Improving accessibility for all ages and mobility levels. Currently none of the four underground stations have step free access, only two of the nine rail stations are fully step-free, and two out of three interchanges are partially step-free. The borough is working with TfL and Govia Thameslink Railways (GTR) railways to bring step free to Bowes Park, Bruce Grove, Alexandra Palace and Finsbury Park as mentioned earlier and all other stations to ensure an acceptable standard of accessibility across the network

The New Local Plan could:

- Support and safeguard planned infrastructure projects like Crossrail 2 and improvements to station accessibility
- Promote and support investigation of long-term strategic extensions of the rail network to the west of the borough
- Ensure that developments in and around public transport connections and stations, improve links and access to the public transportation network for all users and, where appropriate, contribute financially to wider improvements to the walking and cycling network
- Support the rebalancing of space of key streets to prioritise buses, where appropriate
- Ensure that access to existing and future infrastructure projects is safeguarded and considered where appropriate through appropriate design
- Where appropriate, require developments to contribute financially towards bus network infrastructure improvements

Motor vehicles



We are looking to dramatically reduce car use in the borough, however, there will still be a need to provide options for residents who are unable to use public transport or active travel. Equally vehicle use will still be required to support the livelihood of some residents, for example trades/crafts people.

The Council has been working to provide alternatives to individual car use. There are now 75 car club bays in operation in the borough and the Council is in the process of completing a multi operators contract for additional bays. There will be a total of 44 new car club bays to be installed. Haringey is also part of the DriveNow 'floating' car club service. It is a floating model, which means vehicles do not need to be picked up or returned to a specific parking space. It has a fleet of 250 vehicles across the 4 borough operational area, including 50 BMW i3 electric vehicles.

The Council has a policy to promote the uptake of electric vehicles through the implementation of charging infrastructure off street in public car parks and on street parking. The Council installed 38 new charging points in late 2018 across the borough. We now have 54 charging points in the borough, up from just 16 the previous year.

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

In October 2021 the Central London Ultra Low Emission Zone will be extended to create a single larger zone bounded by the North and South Circular Roads. This will cover the entire borough and mean that anyone driving a petrol or diesel vehicle within the borough will also need to meet tighter emissions standards or pay a daily charge.

Key challenges for Haringey as it works to move away from motor vehicle use include:

- Too much reliance on car use, growth of households with multiple cars, and the perception that high levels of customer parking is needed if town centres are to attract shoppers
- Managing an increasing number of home deliveries, ensuring this is achieved in the most efficient and low carbon way
- Providing options for residents who are unable to use alternatives to the private vehicle i.e. those who rely on a personal car for their employment
- Protecting areas of high parking pressure
- Managing the demand for new crossovers
- Ensuring efficient and low carbon servicing of buildings, including recycling, and waste removal
- Ensuring adequate disability parking for new developments
- Inefficient land use due to overprovision of parking in some areas
- Providing sufficient infrastructure to support the use of electric vehicles over fossil fuel based vehicles
- Car clubs
- Increase coverage and operating hours of Controlled Parking Zones subject to resident support

The New Local Plan could:

- Ensure car-free development is the starting point for all well-connected development proposals, with developments elsewhere to only include the minimum necessary parking
- Review Haringey's parking needs to assess whether lower maximum parking standards than the London Plan are warranted in some areas
- Investigate the potential for a borough-wide freight and last mile delivery network, focusing on hot spots in retail centres, with the aim to consolidate freight and delivery journeys
- Set expectations for the provision of storage and servicing in new developments
- Require all planning applications to include Electric Vehicle charging points where applicable
- Support behavioural change by providing opportunities for electric car club development, establishing car clubs and promoting car sharing, where appropriate
- Ensure adequate provision of accessible parking spaces

How the New Local Plan could help ...

Motorcycles



Two-wheeled vehicles like motorcycles could play a more significant role in low-impact freight and servicing trips. This is particularly true where they replace trips by lorry or van and are made by low emissions motorcycles. The New Local Plan could:

- Require developments to follow the guidance set out in TfL's Urban Motorcycle Design Handbook

Freight



An efficient freight network is necessary to support the function of Haringey, particularly as it includes some large significant industrial areas. To support a sustainable freight network, the New Local Plan could:

- Set out a strategy for key growth areas to reduce freight trips to, from and within these areas and co-ordinate the provision of infrastructure and facilities to manage freight at an area wide level

Gathering Evidence

In recent years we have sought to better understand the issues and opportunities relating to transport in the borough and have produced the following reports:

- Tottenham AAP Transport Modelling and Analysis (SDG) (January 2015)
- Wood Green Transport Study (December 2019)
- Third Local Implementation Plan (LIP) (approved June 2019)

We are also in the process of producing the following plans:

- Walking & Cycling Action Plan
- Parking Action Plan
- Ultra Low Emission Vehicle Action Plan

We would like to hear your views on what additional evidence should be gathered to help inform the New Local Plan.

The Big Question

PL8. How can we create a fair, healthy, accessible and sustainable transport system in Haringey?

Things to consider:

What would encourage you, and our children and young people, to walk, cycle or take public transport more or use your car less?

How can we maximise the benefits of Crossrail 2 if it is delivered and the route runs through the borough?

How can we best support car free developments and a reduction in the amount of car parking, while still providing for residents that are reliant on the private car?

What improvements can be made to enable more efficient and sustainable servicing, deliveries and freight movement?

Are there any issues or opportunities we have missed?

5.4. Economy

The success and vibrancy of Haringey's economy is integral to the future of the borough. Accordingly, Economy is identified in the Borough Plan as priority 4 of the Council with the aim of "a growing economy which provides opportunities for all our residents and supports our businesses to thrive".

While powerful national and international forces have a direct impact on our local economy, we think it is important to be bold about the economy we are trying to shape and influence. We are therefore focused on a model of a 'good economy', with residents and businesses at the heart of what we are trying to achieve. We are committed to a community wealth building approach which builds an economy that is rooted in the local community. An example of this is that the Council has committed to spending more money on goods and services within Haringey, rather than buying things in from outside. We also recognise that access to good employment is integral to the health and wellbeing of residents and therefore to achieving more equal outcomes.

The New Local Plan is a key tool to create a growing and thriving local economy. This section of the Local Plan will cover a wide range of economic activity from office supply to industrial land, as well as shops and high streets. At the current time, due to COVID-19, the future of our economy is very uncertain. While the New Local Plan will not be adopted until 2022 and is intended to provide a long-term planning framework to support the development of the borough's economy, it has significant potential to set out a direction of travel, support recovery and renewal from the economic impacts of COVID-19, as well as to respond to related changes in how we work and where we work.

It's about Fairness

The Council want a good economy for Haringey that works for all and enables residents to prosper. An economy with good quality jobs with good pay and conditions where our businesses can thrive, grow and make a meaningful contribution to Haringey's communities. A good economy provides good work; promotes fairness and equality; supports business and enterprise resilience; contributes to environmental sustainability; and promotes positive health and well-being. We are committed to a community wealth building approach which builds the prosperity of local people and businesses as it travels through the local economy and supports and enrich Haringey's residents and communities – economically, through employment, and socially - with an emphasis on those who are struggling.



The current situation



As at the end of 2019 there were 14,210 active enterprises in Haringey. The number of businesses grew by 16% over the previous four years. The borough's businesses tend to be small with 90% employing under 10 people.

In terms of jobs Haringey has a strong local service offering, with sector specialisms in public services, retail and arts & recreation. There are emerging clusters of activity within the creative, digital and professional service sectors particularly within the cultural quarter in Wood Green and in Tottenham. Haringey has a high net-outflow of commuters, particularly into Central London, reflecting the strong transport connections the area has.

Before COVID-19 the borough had a relatively strong labour market, with high levels of participation, low levels of unemployment and strong skills levels. More than three-quarters of Haringey's working age population were economically active in 2019. However, Haringey workers and residents tend to earn less than average; median hourly pay among Haringey workers is below the statistical neighbour and London rates, while the proportion of residents earning below the London Living Wage is higher. These findings suggest that in-work poverty is likely to be a significant issue for many residents.

The COVID-19 crisis has had an enormous economic impact on the borough and will have short, medium and long-term consequences for Haringey's local economy and residents. 50,400 Haringey residents were furloughed up to June 2020, (35% of the working age population) and early estimates identified 35% of all jobs in Haringey to be at risk. The borough's economy is particularly exposed due to the high number of employees in sectors adversely affected by social distancing: arts and entertainment (7,500 people); accommodation and food (6,000); retail (9,500). The borough has experienced a disproportionately high increase in unemployment versus other London boroughs.

Haringey's economy is significantly represented by small and medium-sized enterprises (SMEs) rather than large businesses, and whilst all have suffered negative impacts in terms of sales, revenue and cash, the degree of impact on SMEs is worse, estimated at 53%, whilst for large businesses it is 36% (comparing January-March 2020 with the previous quarter).

In terms of the wider economy, general forecasts predict there will be a significant fall in 2020/21 up to 16% of GDP which is unprecedented. It is therefore in this very uncertain time, that the New Local Plan provides a positive and pro-active policy context to ensure that businesses and jobs can recover and thrive in the future.

On 1 September 2020 major changes took place to the Use Classes Order which will dramatically impact on the Council's ability to control commercial uses. A new Class E was created covering 'Commercial, Business and Service' uses. This subsumes the former the former Class A1 (shops), Class A2 (Financial and professional services), Class A3 (Restaurants and cafes) and Class B1(Business) uses. The new Class E particularly affects the Council's ability to protect the use mix in the borough's town centres and high streets and it may also result in the loss of business space including in designated employment areas. Classes A4 (pubs) and A5 (hot food takeaway) no longer exist and have become 'Sui Generis' uses (in a class of their own). New classes F1 and F2 were also created; Class F1 relates to learning and non-residential institutions and class F2 relates to local community uses. These partially replace classes D1 and D2 which no longer exist.

5.4.1. Offices and workspace

What should the New Local Plan do?

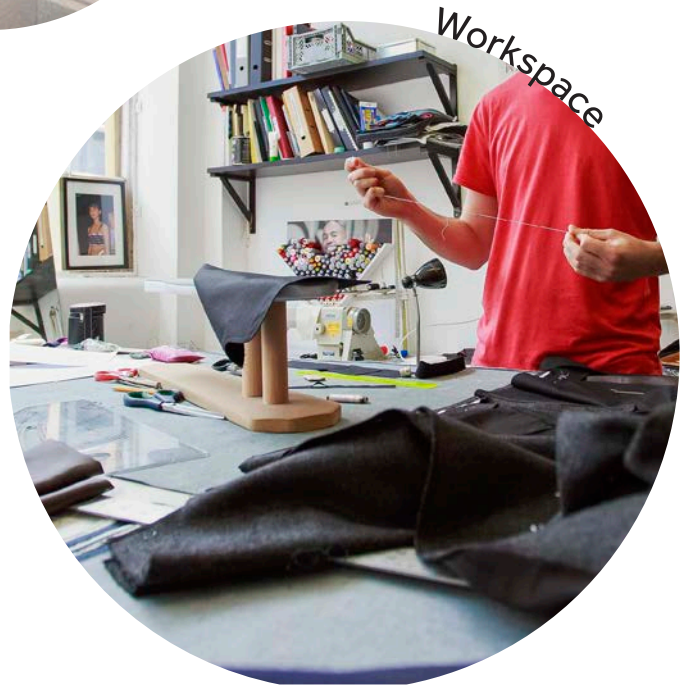
As a starting point the New Local Plan needs to meet demand for office and workspace floorspace over at least a ten-year period. Crucially it must also deliver employment premises that meet the needs of changing work styles such as flexible and co-working space.

In Haringey there is a growing small and medium-sized enterprises (SME) sector and is crucial that we plan for this and ensure they have access to appropriate floorspace. Protecting space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space will be critical to the New Local Plan as well as supporting the delivering of new high quality affordable accommodation to meet need.

At the same time, the New Local Plan must also assess if there are areas of surplus office space that have no reasonable prospect of being used for business purposes. Where this is the case, the New Local Plan needs to ensure that policies for allowing losses take into account appropriate factors such as marketing and viability, as once lost, employment floorspace can be more difficult to replace given the demand for higher value floorspace in the borough such as residential.

The New Local Plan also needs to ensure that there is a supply of affordable workspace in the borough, especially to support smaller enterprises and start-ups, which can in turn grow and provide a valuable economic and jobs boost to our economy.





The current situation

Our Employment Land Study (2015) identified that we have 465,544 sqm of B-class use employment floorspace with approximately 990 office premises. Offices constitute the smallest share of B-class employment floorspace with 15% of overall employment floorspace.

In terms of existing offices, Estates Gazette data shows that 80% of the marketed B-class stock is second hand grade-B, which may limit the options and flexibility offered to potential businesses looking to invest in the borough. However, VOA (2019) estimates suggest that the rate for office floorspace has increased from £101.00 per sqm in 2014/15 to £125.00 per sqm in 2018/19. This increase coincides with the introduction of prior approval permitted development rights to convert offices to residential use.

Our existing Local Plan policies seek to protect existing employment floorspace, and losses should only be allowed where the floorspace is no longer suitable for continued employment use taking into account alternative employment uses, and evidence of vacancies and marketing, to ensure important floorspace is not lost, and that jobs and the economy are protected. It also supports new floorspace in town centres and on employment land. Similarly, the London Plan supports the provision, and where appropriate, protection or reprovision of a range of B Use Class business space, and encourages the provision of flexible and affordable workspace for smaller businesses.

In April 2020 we made an Article 4 Direction to protect office floorspace from being converted to residential use without a planning application (as allowed for via permitted development rights) in an attempt to ensure that the loss of office floorspace can be properly managed, and does not affect the well-being of the local economy. This will take effect in 2021, subject to the outcomes of public consultation.



How the New Local Plan could help

Identify requirement for new employment floorspace



We will be commissioning evidence to assess how much office and workspace floorspace is needed over the next 15 years. We will think carefully about the base date of this work. Future demand for floorspace needs to be seen in the context of a 15 year, forward looking plan, of which it is expected that the pandemic will be a key factor in the short-term, but is unlikely to be an over-riding factor in the longer term. Early advice suggests that whilst there will be a significant drop in national gross domestic product (GDP) during 2020, the rebound may well be 'v' shaped and see the long-term trends for floorspace re-established over the medium and longer term. It is possible that we will see a reduction in demand for office floor space, especially for larger floorplate offices if home working rates are dramatically higher after COVID-19 than before. However, conversely there could be increased demand for more short-term 'touch-down type space' which could be in smaller town centres more local to where people live. This could mean potential for an increase in floorspace within Haringey's town centres away from Central London. We will carefully consider the need for traditional offices versus more modern co-working space.

Protect valuable floorspace – managed release



The New Local Plan can help protect office floor space that is needed to meet demand as well as manage the release of surplus employment floorspace where this can be robustly justified through marketing and viability evidence. We will identify and protect particular economic clusters that are of significant value to the local economy including emerging creative and digital clusters, and ensure employment land is properly identified and classified.

Require affordable workspace



The provision of workspace that is affordable is an important part of our future economic base. The London Plan defines Affordable Workspace as workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic development purpose. Subject to appropriate justification, the New Local Plan could contain policies to require a certain percentage of new employment floorspace to be 'affordable'. This would support small businesses and start-ups to establish themselves and grow, and to ensure that existing businesses in the borough can continue to operate should existing premises be redeveloped which can lead to higher rents being charged. However, this needs to be considered against other competing demands for planning gain such as affordable housing, recognising that there may have to be some trade-offs to ensure development remains viable. The New Local Plan can also ensure that new training opportunities are secured through redevelopment via employment and training contributions. This is something we currently do and propose to continue through the New Local Plan.

Density and location



As well as providing sufficient land for various employment uses, the New Local Plan must ensure this is in the right locations. We want to make the most efficient use of land and so propose to develop policies that support the densifying and intensifying of new and existing employment uses and jobs, including a review of how employment uses (particularly those not in the traditional office category) can be successfully mixed with other uses. We proposing to promote employment uses as part of mixed-use schemes within our town centres and existing employment land and growth areas, particularly where access via public transport, cycling and walking is good.

Gathering Evidence

The following documents underpin the existing Local Plan:

- Employment Study 2008 Update (Atkins) (January 2009)
- Employment Land Update (Atkins) (February 2012)
- Economic Growth Assessment (PBA) (2013)
- Employment Land Study (Atkins) (February 2015)
- Workspace Viability Assessment (GVA) (December 2014)

Evidence completed, underway or to be commissioned to support the New Local Plan and reflect changing circumstances includes:

- Economic Development Strategy (EDS) + Evidence Base (Hatch Regeneris) (2020)
- Employment Land Review (ELR) / Employment Land Need & Availability (ELNA) report
- Wood Green Economy and Employment Space Study (2020)
- Haringey Workspace Providers List (2020)
- Haringey Workspace Design Guide (emerging)

The Big Question

E1. How can the New Local Plan support the delivery of a sufficient amount of office and workspace in the right locations?

Things to consider:

Do you agree that the Council should continue to protect existing viable workspace in the borough, where otherwise new housing could be built?

Taking account of the changing nature of work, which has been greatly accelerated by COVID-19, what types of employment spaces do you think we should be planning for in the future?

Do you consider that there is justification for the Council to seek affordable workspace for economic, social and cultural uses that cannot afford to operate at open market rents and to support start-up or early stage businesses? If so, what priority should securing affordable workspace be given versus securing affordable housing?

Where do you consider are the most appropriate places for new offices and workspaces?

5.4.2. Industry

What should the New Local Plan do?

As for offices and workspace, the New Local Plan must ensure there is sufficient land available to meet the demands of various types of employment in the future including industrial, logistics, warehousing and other related types of employment floorspace. We will therefore need to assess existing employment land, and look at other areas where employment uses are happening, and ensure we categorise and protect or release these as appropriate based on up-to-date evidence of current function, and future demand and need for varying types of uses.



The current situation

Haringey has traditionally had a strong industrial and manufacturing economy relative to the rest of London, with a high concentration of industrial estates to the East of the borough along the Lee Valley corridor. This has provided a range of opportunities for our residents, particularly around clothing, fabric and food manufacturing. The borough contains 133 hectares of employment land, over 1,000 buildings, 722 business establishments and nearly 736,000m2 of employment floorspace. The borough also contains other smaller employment locations which total a further 16.6 hectares of employment land.

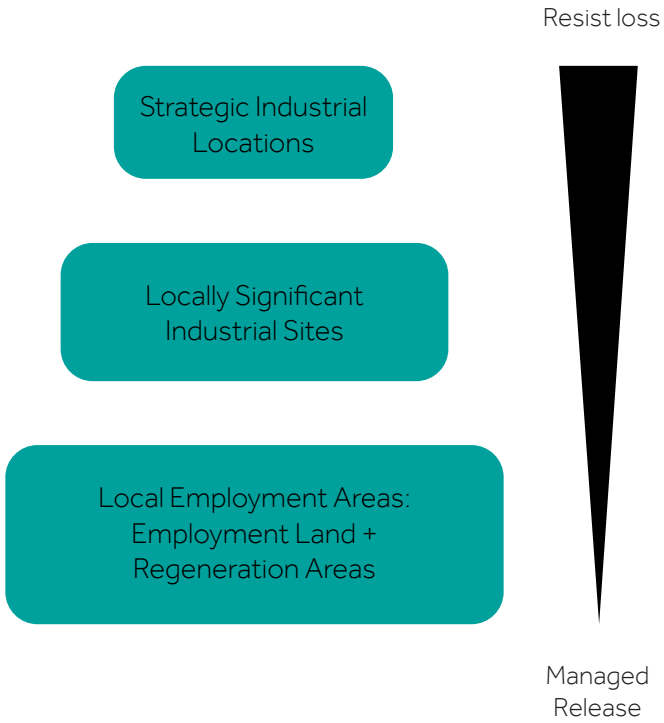
Like many other London boroughs, the level of industrial floorspace has declined in Haringey in recent years. This is due to a number of factors including competing pressure for other types of development (including residential development) and new permitted development rights, in particular those providing for changes from B Use Classes. Loss of industrial land has put increasing pressure on the remaining industrial stock in Haringey, which is reflected in the rental values, which until the onset of COVID-19 had increased by over 60% in four years.

In London, types of industrial and employment land are categorised in order of importance. Strategic Industrial Locations (SIL) sit at the top of this hierarchy and are London's main reservoir of land for industrial, logistics and related uses. These areas are considered critical to the effective functioning of London's economy and can accommodate activities which are not appropriate to locate with other land uses, particularly residential development. Haringey currently has areas of SIL in North East Tottenham and Tottenham Hale. Beneath SIL in the employment land hierarchy are Locally Significant Industrial Sites which are recognised by the London Plan and have borough-wide importance for industrial and related activities.

The Intend to Publish London Plan (2019) contains policy provisions that require no net loss of capacity on these designated employment areas, however the Secretary of State has written to the Mayor of London to request that this provision is relaxed, to allow for some loss for other uses. The Plan recognises the challenges of both meeting housing targets and protecting employment land.

Boroughs may also identify other local employment generating sites that need protection. The existing Local Plan calls this tier of the hierarchy Local Employment Areas. The existing Local Plan takes a more flexible approach to the uses in these areas. The borough also has a range of non-designated sites which support the local economy.

The existing Local Plan supports new or intensified employment floorspace in all these areas and resists the loss of floorspace in SIL and LSIS, but does allow for other uses not traditionally employment focused in LSIS where this is exceptionally justified. On our other designated and non-designated land, a more flexible approach is taken, and mixed use, employment-led development can be allowed where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace.



The borough is also home to the unique land use called 'warehouse living' which is found in the Harringay Warehouse District and in South Tottenham. There is a specific policy framework in the existing Local Plan to support warehouse living which is defined as comprising purpose built and genuine integrated, communal working and living accommodation specifically targeted at the creative industries sectors (see Housing section for more detail).

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

The vast majority of businesses are expected to experience a reduction in turnover as a result of COVID-19. The Greater London Authority anticipates that the following industries are expected to be significantly heavily hit: Accommodation and food services, Construction, Manufacturing, Education, Arts and recreational activities, and Wholesale and retail. Many industrial estate businesses are understood to have experienced a significant drop in turnover, evidenced to be up to 60-70% for some larger manufacturing businesses. Impacts have been highest for suppliers of retail, hospitality and arts sectors. However, ONS reported in June 2020 that 17% of Wholesale and retail and 10% of Transportation and storage businesses have recorded an increase in turnover.

Creative industries were the fastest growing sector in London pre-pandemic, employing 1 out of 6 Londoners, however a DCMS/YouGov survey found that 71% of creative industry businesses are 'at risk' as a result of COVID-19. Only 20% are confident they will still be trading in 2021 which is a significant concern for the local economy.

Until the onset of COVID-19 the borough's industrial land market was performing very well. At present though there is considerable uncertainty for many businesses located on the borough's industrial estates with particular concern surrounding those in the creative and service sectors. However, the further shift towards online retail will likely increase demand for depots and last mile logistics in the future and demand for modern flexible spaces may grow related to businesses acquiring additional premises within the UK to store products a result of Brexit.

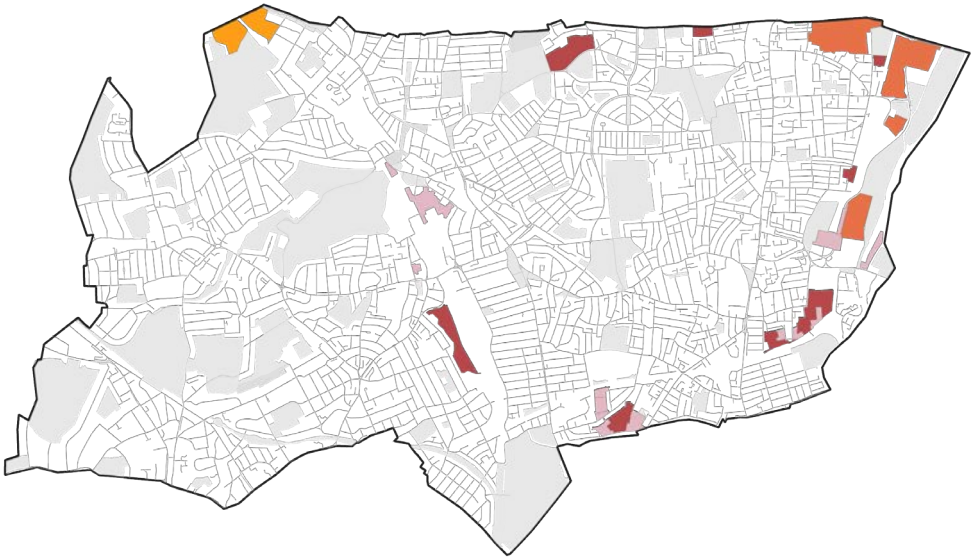
KEY

Industrial and Employment Land

- Strategic Industrial Land (SIL)
- Locally Significant Industrial Land (LSIS)
- Local Employment Area: Employment Area
- Local Employment Area: Regeneration Area

Other

- Green space



How the New Local Plan could help

Identify requirement for new employment floorspace



We will undertake new evidence studies to assess demand for employment land and carry out a review of designated and undesignated employment land in the borough to assess the extent to which we can meet anticipated demand for floorspace in the next 15 years. As part of this we will review the current designations to see whether they remain appropriate. We will not be able to develop a clear strategy until this evidence base has been prepared but as a general approach we propose the New Local Plan will continue a strategy of mixed-use intensification, to allow for the redevelopment and intensification of industrial sites, with no loss of capacity on SIL or LSIS land where these designations are found to still be justified.

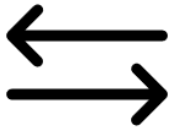
Intensification and co-location



The New Local Plan will also look at ways to make more effective use of employment land. We will investigate opportunities for industrial intensification to provide additional industrial capacity including the potential for co-location of other uses on employment land to support the delivery of residential and other uses such as social infrastructure where it would not compromise their continued efficient function, and also to rationalise areas of SIL or to substitute industrial land in the wider sub-region, taking into account the positive and negative impacts of substitution.

In doing so, the New Local Plan will consider where and what types of activities (particularly light industrial) on existing employment land could be co-located or mixed with residential and other uses whilst ensuring we deliver better quality industrial spaces. The Haringey Workspace Design Guide will explore mixed-use residential industrial typologies, but it is recognised that these are extremely challenging to deliver successfully. Other uses could include the night-time economy and culture which may be better suited to being co-located with industrial uses. The New Local Plan will also need to identify and determine where we should cluster industrial uses that are incompatible with other uses, such as on SIL land or where existing such uses already are, and do not detrimentally affect other nearby uses, and where the best locations are for some intensification of industrial uses.

Managed release



It will also be necessary for the New Local Plan to take a proactive approach to the management of vacancy rates to ensure that where sites are vacant for long periods, alternate uses can be explored. Where employment land is not designated, we intend to continue with a managed release approach whereby evidence to demonstrate 'no reasonable prospect' of the land being used for employment purposes would need to be provided including evidence of regional demand and marketing, and that mixed use developments have been explored.

We intend to retain a policy on Warehouse Living specific to the existing defined area (see Housing section).

Gathering Evidence



The following documents underpin the existing Local Plan:

- Employment Study 2008 Update (Atkins) (January 2009)
- Employment Land Update (Atkins) (February 2012)
- Economic Growth Assessment (PBA) (2013)
- Employment Land Study (Atkins) (February 2015)
- Workspace Viability Assessment (GVA) (December 2014)

Evidence underway or to be commissioned to support the New Local Plan and reflect changing circumstances includes:

- Economic Development Strategy (EDS) + Evidence Base (Hatch Regeneris) (2020)
- Employment Land Review (ELR) / Employment Land Need & Availability (ELNA) report
- Wood Green Economy and Employment Space Study (EES)
- Haringey Workspace Design Guide (emerging)
- Upper Lea Valley Industrial Intensification/co-location work

The Big Question



E2. How can the New Local Plan support the delivery of a sufficient amount of industrial and employment land to meet current and future need?

Things to consider:

Do you agree we should continue to protect viable industrial and employment land , where otherwise new housing could be built?

What do you think are the best approaches for intensification of industrial and employment land?

Where do you think mixed use development or co-location of uses on industrial sites could be appropriate?

Are there any particular sites where we should be seeking to deliver industrial intensification? (Also see Call for Sites)

Do you think there are any opportunities for industrial land substitution with other local authorities?

When considering whether industrial or employment land should be released for other uses or what criteria should we use to assess this and what evidence should be required as justification?

5.4.3. Shops and high streets

What should the New Local Plan do?



As is evident today, retailing and town centres are changing in response to recent trends and future forecasts for shopping habits, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet. It is therefore necessary for the New Local Plan to assess the future demand and capacity for both comparison and convenience goods retailing and plan proactively to accommodate that demand and manage the transition of surplus retail units to ensure our town centres continue to function and remain destinations of value to residents and businesses.

It will be important that the New Local Plan promotes a diverse range of uses to support the vitality and viability of town centres including assessing what types of uses (shops, offices, bars, cafes and restaurants, leisure and cultural facilities, creative workspace) should be promoted and where, and the amount of these uses that would sustain our town centres without detracting from or fragmenting a core shopping area to the detriment of the centre.

In September 2020 the Use Classes Order was substantially amended. The Government introduced a new Class E: 'Commercial, service and business class' – this combines Use Classes A1-A3 (shops, cafes, restaurants and financial services), B1 (business), parts of D1 (health, crèches and nurseries) and parts of D2 (indoor sports and recreation) into the one new Use Class. This means that any premises within these uses can freely change to any other use within this definition without Planning Permission. Consequently, the Council has lost a significant degree of control over changes of use for commercial, office and certain other uses. The Council will not be able to proceed with its current policy positions of concentrating and protecting retail uses in certain locations. The New Local Plan will need to respond to the changes to the Use Classes Order and provide a new policy approach which supports the vitality and vibrancy of the borough's town centres and high streets within the new parameters of the Use Classes.

Some retail and related uses when clustered can support town centres to develop niche specialist roles such as the Turkish restaurant offer on Green Lanes and may provide important visitor attractions. Over concentrations of some uses however, such as betting shops, pay-day loan stores, and hot food takeaways, can cause negative impacts on a centre and our residents' health and wellbeing, and so the New Local Plan should attempt to avoid the proliferation and concentration of these uses.

Additionally, the New Local Plan can look to promote other forms of retailing such as street markets which can play a valuable economic, social and cultural role, and provide opportunities for new businesses to start-up.

The current situation

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

- Metropolitan Centre: town centres with a focus on higher order comparison goods retailing (more expensive items not required so frequently which people are usually prepared to travel further to get such as furniture and electronic goods), with higher density employment opportunities, leisure and residential developments. Wood Green is the only Metropolitan Centre within Haringey
- District Centre: town centres with a focus on a viable range of functions, particularly convenience, leisure, local employment and workspace. There are six District Centres in Haringey, and one which partly lies within Haringey (Finsbury Park)
- Local Shopping Centres: these provide for the day-to-day needs of people living and working nearby. There are 38 of these centres in Haringey

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

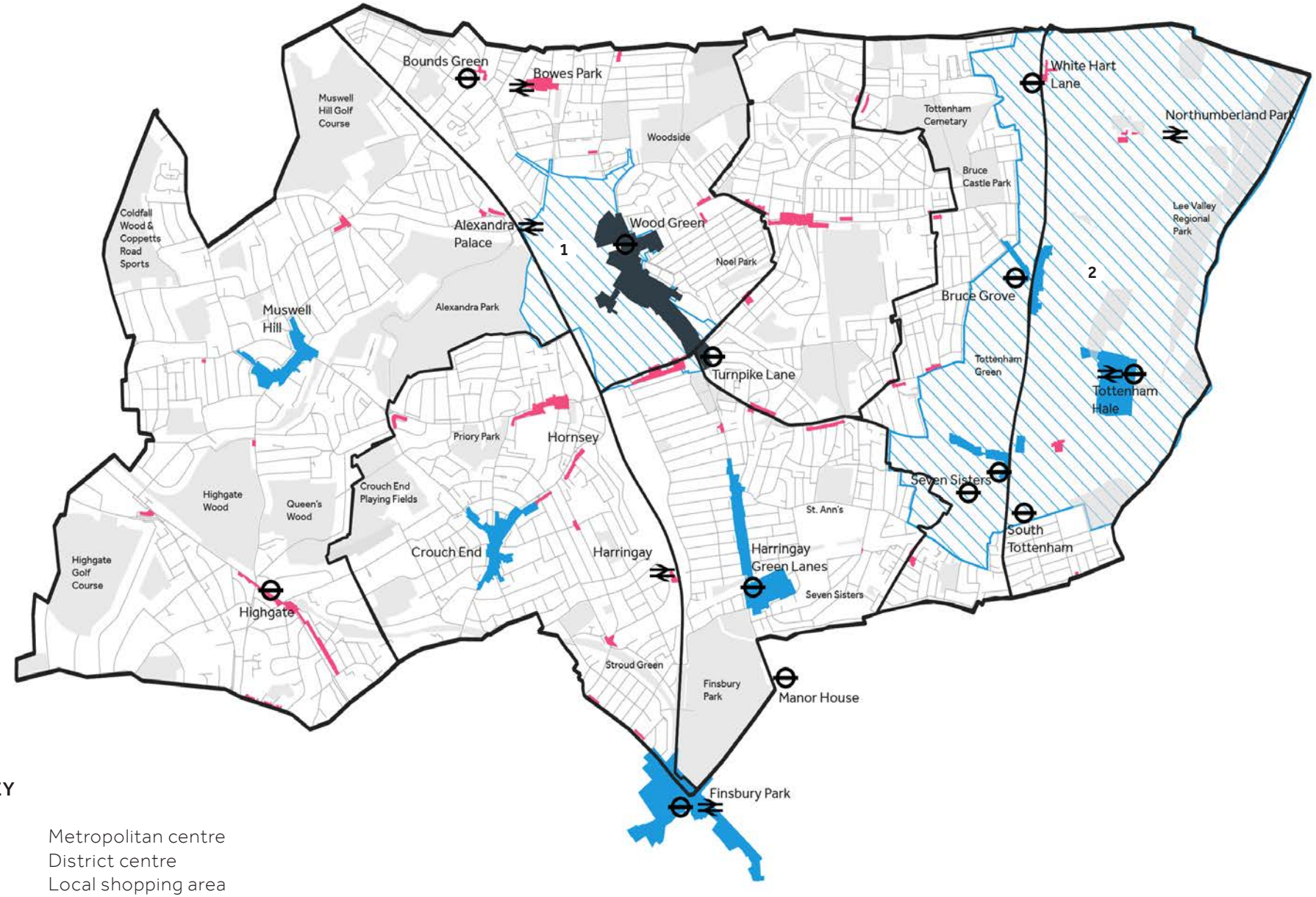
With regards to primary retail frontages, with the exception of Wood Green, most centres are at or just above this threshold.

Pre-COVID-19, Haringey's town centres were generally performing well. There was strong demand for retail space in Haringey, reflected in the low vacancy rates across the borough and rising rental values which have increased 74% over the past three years. This goes against trends elsewhere, where high streets have struggled against the rise of online shopping. Particularly strong growth has taken place in Bruce Grove/Tottenham High Road, Wood Green and Muswell Hill.

Town centres will continue to play an important role in supporting commercial and residential development in the future, with the potential to support new developments going forward. However, there are concerns within some town centres regarding safety, connectivity and cleanliness. Around a fifth of all crime in Haringey takes place in its town centres. This largely consists of anti-social behaviour, shoplifting and theft. Town centres with the highest number of crimes committed are Finsbury Park and Wood Green.

As part of the development of the London Plan, the GLA undertook a review of the role and function of town centres across London. This highlighted that there was 'high' potential for commercial growth in the future, particularly highlighting opportunities at Tottenham Hale.





KEY

- Metropolitan centre
- District centre
- Local shopping area
- Green space

How the New Local Plan could help

The eight key town centres in Haringey form part of the Mayor's Town Centre Network in which they are defined as Metropolitan or District centres. We intend to keep these designations but will assess smaller local centres to determine if they are in the correct tier of the hierarchy.

We propose to promote Wood Green as the primary shopping destination in the borough and bolster its role as Metropolitan Centre by directing major new retail proposals to it and supporting new employment and leisure facilities.

The New Local Plan could also contain policies that support opportunities for new areas for retail and non-retail uses in opportunity areas, particularly in and around the area currently identified as Tottenham Hale Retail Park District Centre and in North Tottenham in the vicinity of the Tottenham Hotspur Stadium and High Road West, where a significant quantum of new retail, leisure and employment space is being delivered or is planned in the future.

We will explore a more flexible policy approach that moves away from the current retail and non-retail thresholds. This is necessary in light of the recent changes to the Use Class Order.

In addition, we propose to:

- Identify areas where the Council will support new retail development, and where the Council would encourage concentrations of traditional A1 shop frontages to maintain a core shopping area
- Support and promoting café, restaurants, pubs and night time/ evening economy uses in all centres subject to the above reviews and evidence
- Introduce policies to encourage more housing in centres to help meet housing need but not including the change of use of an entire shop to housing without keeping a commercial or community use on the ground floor with an active frontage
- Develop more pro-active policies to help manage vacant floor space by supporting and promoting pop-up and meanwhile uses where appropriate
- Continue to protect public houses, assessing marketing evidence where the proposal would result in the loss of a pub
- Consider policies that restrict a proliferation of negative uses such as betting shops or pay day loan lenders







Gathering Evidence

In light of the issues described above, there are likely to be significant changes to town centres in coming years, and the Council needs to think about how it can deal with these, whilst ensuring national and regional requirements to plan for and meet the demand for retail floorspace are met, and that our town centres continue to meet the needs of our local communities and are vibrant and successful.

Our existing Retail Study 2013 assessed town centres boundaries, frontages and the need for additional floorspace informing the policies within the existing Local Plan and set those boundaries and frontages. It found that retail demand for new floorspace was about 37,000sqm of new floorspace.

Due to the ongoing COVID-19 pandemic, at this stage these impacts will be difficult to establish, but it is the Council's intention to update this study. It is possible that we might have too much shopping floorspace at some point in the future and a more flexible approach to change of use is needed. However, this should not be at the expense of the function and vitality of the centre.

Key evidence will therefore need to look at how much floorspace we actually need, and whether the extent of our existing town centres is appropriate in light of this. It will also consider how much flexibility should be given to changes of use, and whether policies should be more or less flexible in protecting core retailing uses.

The Council has carried out three surveys about the economic impacts of COVID-19, two for businesses in general and one specific one for creative industries.

The Big Question

E3. How should the New Local Plan support our town centres and high streets?

Things to consider:

Do you agree we should have more commercial uses such as cafes, bars estate agents etc in areas that were previously focused around shops and retail?

Do you agree with the proposed approach of identifying areas for a core retailing role within town centres, and how might this be achieved given the changes to the Use Classes Order?

What should our approach be to uses such as pubs and hot food takeaways in town centre ground floor frontages?

Should housing, including residential on upper floors be promoted in town centres? What about housing on the ground floor where shops and other retail units are usually located? Are there any specific centres where a relaxed policy to encourage more housing within ground floor frontages should apply?

Does the existing town centre hierarchy categorise borough town centres correctly?

Should Wood Green be the primary focus for new large scale retail development?

5.4.4. Visitor infrastructure

What should the New Local Plan do?

Providing accommodation for visitors coming to see Haringey's attractions such as Alexandra Palace or a game at the Tottenham Hotspur Stadium can provide a boost to our local economy, and the New Local Plan should support the enhancement and extension of our attractions and supporting infrastructure including visitor accommodation, a high-quality public realm and public toilets.

How the New Local Plan could help

We propose to continue to support the provision of traditional visitor accommodation such as hotels and bed and breakfast accommodation alongside serviced accommodation within the borough in accessible locations and town centres, and particularly where it is in the vicinity of existing or proposed new tourist or cultural venues.

The Big Question

E4. Do you agree that we should support new visitor accommodation within accessible locations and town centres?

Things to consider:

Should we support different forms of visitor accommodation such as serviced apartments?

5.4.5. Skills and opportunities

What should the New Local Plan do?

The New Local Plan should support employment, skills development, apprenticeships, and other education and training opportunities for the borough's residents. This is to address employment and skills issues within the borough and to ensure that new development provides opportunities and benefits for existing communities.

The current situation

Haringey has a relatively strong labour market with low levels of unemployment, but high levels of in-work poverty; a combination of high-cost of living and low/stagnant income/wages means an increase in the number of households with at least one adult in employment experiencing poverty. Many residents are underemployed, in employment below their skill level.

There is also a lack of quality jobs. Recent trends include insecure zero-hour contracts, rise of the 'gig economy' and poor wages, 29% of employees are paid below London Living Wage. Hollowing of the London Labour market has resulted in a significant fall in mid-skilled jobs, meaning residents have limited opportunities for progression.

There is a need to address unequal access to work with additional barriers for women, BAME and residents who have a disability in the east.

In London, Haringey has the fourth highest proportion of residents that have no skills (8.7%). There are issues with residents not possessing high-level skills required by the labour market; and school leavers leaving education without the skills required by the labour market. Our high proportion of residents with no skills and those in low skilled jobs are most at risk of automation.

There is a marked disparity in employment and skills across the borough, following a similar pattern to overall levels of deprivation. There is a concentration of employment deprived areas to the east of the borough, whereas areas to the south west of the borough are amongst the least employment deprived in England. The prosperity of the west does however mask pockets of significant deprivation in otherwise high-income wards.

There are significantly more development opportunities in the east of the borough and so capturing opportunities through new development to address the employment and skills gap in this area is important.

The existing Local Plan contains a specific policy for improving skills and training through new development to support access for jobs. This seeks to make employment and training opportunities provided in new developments available to local residents as part of Section 106 planning agreements, often measured based on the number of new apprenticeship or training starts. It also sets out that the Council will secure financial contributions from development that results in a net loss of employment floorspace to invest in training and other initiatives that seek to promote employment and adult education in the borough. The Council's Planning Obligations SPD provides further details about the contributions expected from new development. The current approach is subject to a number of limitations.

The Current Situation ...



The current approach

The London Plan is clear that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases of development. It notes that while the common approach to this of developers making employment and training opportunities in new developments available to local residents as part of Section 106 planning agreements. the current model does not always succeed in enabling residents to complete their training, securing sustainable employment for local people or meeting the demand for construction skills. It therefore requires us to ensure that that implementation is done in ways that:

- Enable those people undertaking training to complete their training and apprenticeships
- Ensure the greatest possible level of take-up possible by Londoners of the training, apprenticeship and employment opportunities created; and
- Increase the proportion of under-represented groups within the construction industry workforce.

The Council recognises key challenges with outdated perceptions on apprenticeships and making the levy work for all businesses.

How the New Local Plan could help



As a starting point, we propose to retain the current approach of securing employment opportunities through Section 106 agreements on new developments and securing financial contributions from development that results in a net loss of employment floorspace, as outlined in the borough's Planning Obligations SPD. We will explore how measures can be as effective as possible in enabling training to be completed and in supporting sustainable employment for residents post-completion. This could involve securing financial contributions under a wider set of circumstances (i.e. not just schemes involving a net loss of employment floorspace), requiring longer apprenticeships and requiring their completion rather than just starts, as well as securing the facilitation of training opportunities through policy.

The Big Question



E5. How can the New Local Plan best support the delivery of employment and training opportunities through the planning system?

Things to consider:

Would you support the Council working with other boroughs on a cross- borough or London-wide approach to employment and skills if this results in better outcomes for residents?

6. Our Future Growth

The New Local Plan must include an overarching strategy to meet the future needs of the borough (set out section 3.3), identifying changes that will be supported and identifying broad locations for new homes and other development.

The current Local Plan sets out the Council's overall strategy for managing future growth in Haringey up to 2026. The strategy:

- Promotes the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs, and supports appropriate development at other accessible locations, with more limited change elsewhere
- Seeks to deliver at least 19,802 homes over the period 2011-2026 (820 homes per year from 2011- 2014 and 1502 homes per year from 2015-2026)
- Promotes significant development in the following Growth Areas: Wood Green; Tottenham Hale; and North Tottenham (which includes Northumberland Park, the redevelopment of Tottenham Hotspur Stadium, and High Road West). These were the areas assessed as having the greatest capacity for growth
- Promotes development in the following Areas of Change: Tottenham High Road Corridor; and Seven Sisters Corridor. These are areas assessed as having considerable potential for growth, through on a lesser scale than growth areas
- Provides that parts of the borough outside of the Growth Areas and Areas of Change will experience some but limited development and change
- Encourages effective and efficient use of land and expects density of housing development to comply with the Density Matrix in the London Plan 2015
- Is illustrated via a Key Diagram which identifies the Key Areas for which there are specific spatial policies for managing growth and change

There are elements of the existing Local Plan growth strategy that must remain in the New Local Plan such as directing significant growth to Wood Green and Tottenham (these are identified as Opportunity Areas in the London Plan). Other elements of the existing Local Plan growth strategy remain appropriate too but there is a need to consider potential changes to make and think further ahead to the future.

We are committed to continuing our existing approach of promoting development in accessible locations and delivering most new development on brownfield sites. **However, we will need to look beyond our existing approaches and find additional means to accommodate growth and meet the needs of a growing and changing population.**



6.1. Approach to growth

This section outlines a number of possible growth approaches within the borough. We will need to pursue most of these in order to meet our growth targets. If we do not pursue one or more of the approaches this means we will need to deliver more growth within the remaining approaches, and we would welcome your views on the options you prefer. Please note, the options are not mutually exclusive to each other and in some cases overlap e.g. our key growth areas contain a number of our town centres.

Approach 1 - Key Growth Areas

The existing Local Plan identifies 3 Key Growth Areas: Wood Green, Tottenham Hale and North Tottenham. We propose to continue with the current Key Growth Areas and intensify development in them where possible. Although good progress has been made in implementing existing plan proposals within the Key Growth Areas, particularly at Tottenham Hale, there are still outstanding proposals to be delivered. However, there is finite land capacity. To accommodate the anticipated levels of growth, some new and existing development sites may require greater intensification including delivering taller buildings.

Approach 2 - Key Road Corridors

The existing Local Plan identifies two Areas of Change along Key Road Corridors: Tottenham High Road Corridor and Seven Sisters Corridor. We propose to continue with these Key Road Corridors and explore opportunities for intensification in them where possible.

Approach 3 - Town Centres

This approach would deliver growth within the borough's six main town centres: Wood Green, Muswell Hill, Crouch End, Tottenham High Road/ Bruce Grove, Green Lanes, and West Green Road/ Seven Sisters Road. Town centres have an important role to play in accommodating future homes, employment, social and community infrastructure, cultural and entertainment uses. They are sustainable locations accessible by public transport, walking and cycling.

Approach 4 - Incremental intensification within PTALs 3-6 or within 800m distance of a station or town centre boundary

The London Plan is supportive of incremental intensification of existing residential areas within a Public Transport Accessibility Level (PTAL) of 3-6 or within 800m distance of a station or town centre boundary. This approach would lead to changes in the character of some of the more suburban areas of the borough.

Approach 5 - Suburban Intensification

The London Plan highlights the potential for the incremental intensification of existing residential areas to contribute to London's housing need. Linked to this, it sets each borough a minimum ten-year target for delivering new homes on small sites (defined as being below 0.25 hectares in size). As a largely suburban borough, Haringey has many existing residential areas that may be able to contribute to future growth through incremental intensification. This could take forms such as new build, infill development, residential conversions, or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. This approach would need to be supported by appropriate design guidance such as a Haringey housing design code.

Approach 6 - Housing delivery on employment land

We are required to meet development needs for not just housing but also non-housing land uses such as employment and retail. As such, it is necessary to safeguard an appropriate amount of land for these purposes. The existing Local Plan protects land for employment uses via four employment related designations. Subject to the outcome of future evidence base work to establish employment land needs in the borough, there may be the opportunity to deliver an element of housing growth on land currently safeguarded for employment uses. There may also be opportunities to deliver housing on employment land via industrial intensification, co-location and substitution.

What do you think?

AG1. What do you think about the current Local Plan strategy for providing the new homes, jobs and facilities that are needed?

AG2. The current Local Plan sets out that most growth should happen in Wood Green and Tottenham. Do you think this should still be the case?

AG3. Where would you like to see the New Local Plan focus new homes, jobs and accompanying infrastructure improvements in the future?

AG4. What are your preferred approaches for delivering future growth in Haringey and why?

AG5. What are your least preferred approaches for delivering future growth in Haringey and why?

AG6. Which combination of approaches provides the most sustainable growth, and why?

AG7. Can you suggest any other approaches for accommodating future growth and new development in a sustainable manner?

6.2. Call for sites

As an early stage of preparing this New Local Plan, we want to know about potential sites or broad locations that you think are suitable for development.

The Government requires local planning authorities to conduct a 'call for sites' exercise as a key component of the Strategic Housing and Economic Land Availability Assessment to inform policies in the New Local Plan for housing, employment and other uses.

Better understanding land availability for development in Haringey will ensure that the New Local Plan allocates enough land to meet identified needs. It will also ensure that it can choose the right sites from a range of potential alternatives, having assessed their suitability, availability and achievability.

Submit a site

We want to know if you think there are any potential sites or broad locations for development in Haringey that should be put forward for consideration that we are not already aware of. A number of sites in the existing Local Plan are already being considered for incorporation within the New Local Plan. Please see section 6.3 for details of these.

Housing development includes market housing for sale, affordable housing, housing for rent, student housing, other specialist housing such as care homes, sites for travellers, and sites for people wishing to commission or build their own homes (self and custom build housing).

Economic development includes development for B1 (Business), B2 (General Industrial) and B8 (Storage and Distribution) uses. It does NOT include retail, hotels, leisure or recreation development.

Please only submit sites and broad locations that are capable of delivering 5 or more dwellings or economic development on sites of 0.25 hectares (or 500 square metres of floor space) and above.

Please use the form available at xxxxx to submit a site. A separate form should be used for each site. The deadline for responses is xxxx

In addition, we would be interested to hear any general views about the market and how to maintain supply and delivery.

What do you think?

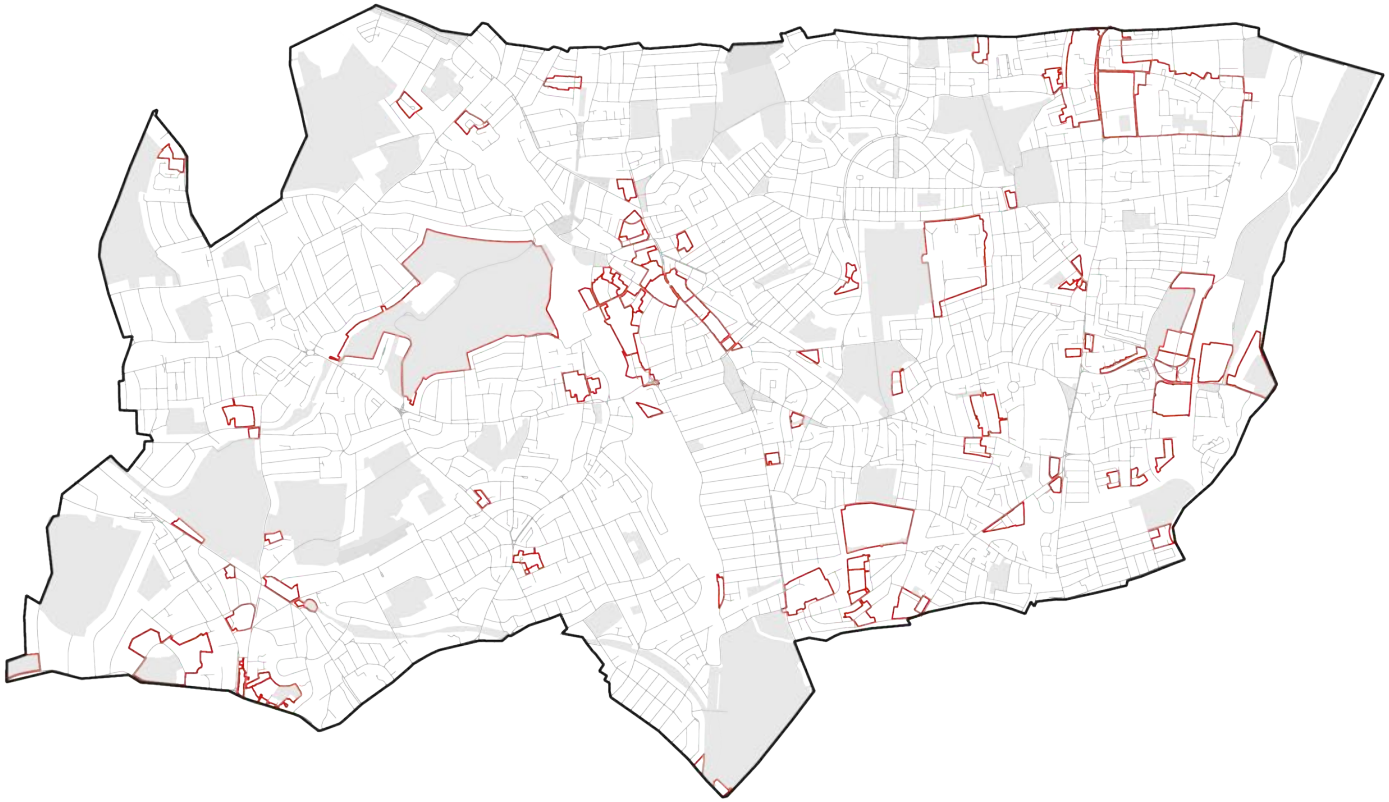
CS1. Do you consider there are any key barriers to delivery of new development in the borough, such as infrastructure constraints? And if yes, do these affect particular types of development, such as small sites or large small sites?

6.3. Site specific proposals

Existing site allocations

The existing Local Plan contains a series of site-specific proposals known as site allocations. We are interested to hear from you whether you think they should be retained in the New Local Plan, changed in the New Local Plan or deleted. It would help us if you could explain why and provide relevant evidence where you have this.

Please note that the Council will be reviewing all allocations which relate to sites in its ownership.



Reference	Site Name	Ward (based on current boundaries)	Keep/change/delete
SA5	LBH Civic Centre	Woodside	These allocations are proposed to be superseded by allocations in the emerging Wood Green Area Action Plan which is a standalone document that is subject to a separate consultation process
SA6	Green Ridings House	Woodside	
SA7	Wood Green Bus Garage	Woodside	
SA8	Station Road Offices	Woodside	
SA9	Mecca Bingo	Noel Park	
SA10	Morrison's Wood Green	Noel Park	
SA11	Wood Green Library	Noel Park	
SA12	The Mall	Noel Park	
SA13	Bury Rd Car Park	Noel Park	
SA14	16-54 Wood Green High Rd	Noel Park	
SA15	L/b Westbury & Whymark Avenues	Noel Park	
SA16	Turnpike Lane Triangle	Noel Park	
SA17	North of Hornsey Rail Depot site	Noel Park	
SA18	Wood Green Cultural Quarter (north)	Noel Park	
SA19	Wood Green Cultural Quarter (south)	Noel Park	
SA20	Wood Green Cultural Quarter (east)	Noel Park	
SA21	Clarendon Square Gateway	Noel Park	
SA22	Clarendon Square	Noel Park	
SA23	Clarendon Rd South	Noel Park	
SA24	NW of Clarendon Square	Noel Park	
SA25	Land adjacent to Coronation Sidings	Noel Park	
SA26	Hawes & Curtis, Green Lanes	Harringay	
SA27	Wightman Rd	Harringay	
SA28	St. Ann's Hospital Site	St. Ann's	
SA29	Arena Retail Park	Seven Sisters	
SA30	Arena Design Centre	Seven Sisters	
SA31	Crusader Industrial Estate	Seven Sisters	
SA32	Omega Works	Seven Sisters	

SA33	Vale/Eade Rd	Seven Sisters	
SA34	Overbury & Eade Rds	Seven Sisters	
SA35	L/b Seven Sisters & Tewkesbury Rds	Seven Sisters	
SA36	Finsbury Park Bowling Alley	Harringay	
SA37	18-20 Stroud Green Road	Stroud Green	
SA38	460-470 Archway Road	Highgate	
SA39	Former Highgate Rail Station	Highgate	
SA40	Gonnermann Antiques and Goldsmith's Court	Highgate	
SA41	Highgate School	Highgate	
SA42	Highgate Bowl	Highgate	
SA43	Summersby Road	Highgate	
SA44	Hillcrest	Highgate	
SA45	Highgate Magistrates Court	Highgate	
SA46	Hornsey Depot	Hornsey	
SA47	Cross Lane	Hornsey	
SA48	Hornsey Town Hall	Crouch End	
SA49	72-96 Park Road & Lynton Road	Muswell Hill	
SA50	St. Luke's Hospital Site	Muswell Hill	
SA51	Cranwood Care Home	Muswell Hill/Highgate	
SA52	Alexandra Palace	Alexandra	
SA53	Tunnel Gardens	Alexandra	
SA54	Coppetts Wood Hospital	Fortis Green	
SA55	Park Grove & Durnsford Rd	Bounds Green	
SA56	Myddleton Rad Local Centre	Bounds Green	
SA57	Red House	St.Ann's	
SA58	Haringey Professional Development Centre	West Green	
SA59	Keston Centre	West Green	
SA60	Barber Wilson	West Green	
SA61	Broadwater Farm area	West Green	
SA62	The Selby Centre	White Hart Lane	

SA63	The Roundway	White Hart Lane	
SA64	Leabank and Lemsford Close	White Hart Lane	
SS2	Lawrence Road	Tottenham Green	
SS3	Brunel Walk and Turner venue	Tottenham Green	
SS4	Gourley Triangle	St. Ann's	
SS5	Wards Corner	Tottenham Green	
SS6	Apex House & Seacole Court	Tottenham Green	
TG2	Tottenham Chances & Nicholson Court	Bruce Grove	
TG3	Tottenham Police Station and Reynardson Court	Tottenham Hale	
BG2	Bruce Grove Station	Bruce Grove	
BG3	Bruce Grove Snooker Hall and Banqueting Suite	Bruce Grove	
BG4	Tottenham Delivery Office	Bruce Grove	
NT3	Northumberland Park North	Northumberland Park	
NT4	Northumberland Park	Northumberland Park	
NT5	High Road West	Northumberland Park	
NT6	North of White Hart Lane	Northumberland Park	
NT7	Tottenham Hotspur Stadium	Northumberland Park	
TH2	Tottenham Hale Station	Tottenham Hale	
TH3	Tottenham Hale Retail Park	Tottenham Green	
TH4	Station Square West	Tottenham Hale	
TH5	Station Square North	Tottenham Hale	
TH6	Ashley Road South Employment Area	Tottenham Hale	
TH7	Ashley Road North	Tottenham Hale	
TH8	Hale Village	Tottenham Hale	
TH9	Hale Wharf	Tottenham Hale	
TH10	Welbourne Centre & Monument Way	Tottenham Hale	
TH11	Fountayne Road	Tottenham Green	
TH12	Herbert Road	Tottenham Green	
TH13	Constable Crescent	Tottenham Green	

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Integrated Impact Assessment (IIA): Draft Scoping Report

New Haringey Local Plan | October 2020

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1. Purpose of this Report

1.1 Background

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

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

- A **Sustainability Appraisal** – A systemic process required under the Planning and Compulsory Purchase Act 2004 and by EU Directive that is carried out during the preparation of the Local Plan. Its purpose it is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives when judged against reasonable alternatives.
- An **Equalities Impact Assessment** – This aims to ensure that through preparation of the Local Plan the Council is complying with its duty in relation to the Equality Act 2010 to eliminate unlawful discrimination in carrying out its functions, promote equality of opportunity between different genders, racial groups and other equality groups and foster good relations between people who shared a protected characteristic and those who do not share it. Although low income groups are not identified as having 'Protected Characteristics', they will be considered as part of this assessment as low income and deprivation typically overlap with many protected characteristics.
- A **Health Impact Assessment** – This helps ensure the plan promotes health gains for the local population, reduces inequality and avoids activity damaging health. This is not a statutory requirement but is good practice to support plan-making.

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

In addition to the IIA assessment, under Article 6(3) and (4) of the Direction 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (Habitats Directive) land-use plans, including Local Plans are subject to **Habitats Regulations Assessment** (HRA). The HRA assesses the impacts of a land-use plan on the conservation objectives of a

European Site to identify whether it would adversely affect the integrity of the site. The HRA will be undertaken as part of the production of the Local Plan and its findings will be taken into account in the IIA where relevant.

1.2 Purpose of the Scoping Report

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

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

A. **Context Review** – a review of relevant policies, plans, programmes, sustainability objectives and strategies produced by the Government, Council and other key organisations such as the Greater London Authority (GLA).
B. **Baseline Review** – a review of the current characteristics and conditions in the borough and future trends in the absence of a new plan.
C. **Key Issues and Opportunities Summary** – a summary of the key issues and opportunities identified in A and B. This is focused on areas that the plan can influence.
D. **IIA Framework Development** – a refinement of the key issues.



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

1.3 Structure of the Scoping Report

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

People (Priority 2)

- Demographics
- Social Integration and Inclusion
- Health
- Education

Place (Priority 3)

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

Housing (Priority 1)

- Housing

Economy (Priority 4)

- Economy and Employment
- Town Centres

Each topic chapter sets out:



1. the policy **Context**



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



3. **Health and Equalities Impacts**



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

1.4 United Nations Sustainable Development Goals

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

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

- Target 11.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums – **see chapter 5, Housing**
- Target 11.2 By 2030, provide access to safe, affordable, accessible and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons - **see section 4.9, Transport**
- Target 11.3 By 2030, enhance inclusive and sustainable urbanization and capacity for participatory, integrated and sustainable human settlement planning and management in all countries – **see Engagement and Communications Plan for the New Local Plan.**
- Target 11.4 Strengthen efforts to protect and safeguard the world's cultural and natural heritage – **see chapters 4.8, 4.7, 4.5 and 4.6, Biodiversity and Open Spaces, Land and Soils, Landscape, and Heritage and Culture.**
- Target 11.5 By 2030, significantly reduce the number of deaths and the number of people affected and substantially decrease the direct economic losses relative to global gross domestic product caused by disasters, including water-related disasters, with a focus on protecting the poor and people in vulnerable situations **see section 4.3, Climate Change Adaptation**
- Target 11.6 By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management **see sections 4.2 and 4.12, Air Quality, Waste Management**
- Target 11.7 By 2030, provide universal access to safe, inclusive and accessible, green and public spaces, in particular for women and children, older persons and persons with disabilities – Open spaces etc. **see section 4.5, Biodiversity and Open Spaces**
- Target 11.A Support positive economic, social and environmental links between urban, peri-urban and rural

areas by strengthening national and regional development planning - **This is covered by the London Plan and the Duty to Co-operate**

- Target 11.B By 2020, substantially increase the number of cities and human settlements adopting and implementing integrated policies and plans towards inclusion, resource efficiency, mitigation and adaptation to climate change, resilience to disasters, and develop and implement, in line with the Sendai Framework for Disaster Risk Reduction 2015-2030, holistic disaster risk management at all levels – **see sections 4.3 and 4.2, Climate Change Adaption and Mitigation**
- Target 11.C Support least developed countries, including through financial and technical assistance, in building sustainable and resilient buildings utilizing local materials – **This is considered to be a national matter, beyond the scope of the New Local Plan**

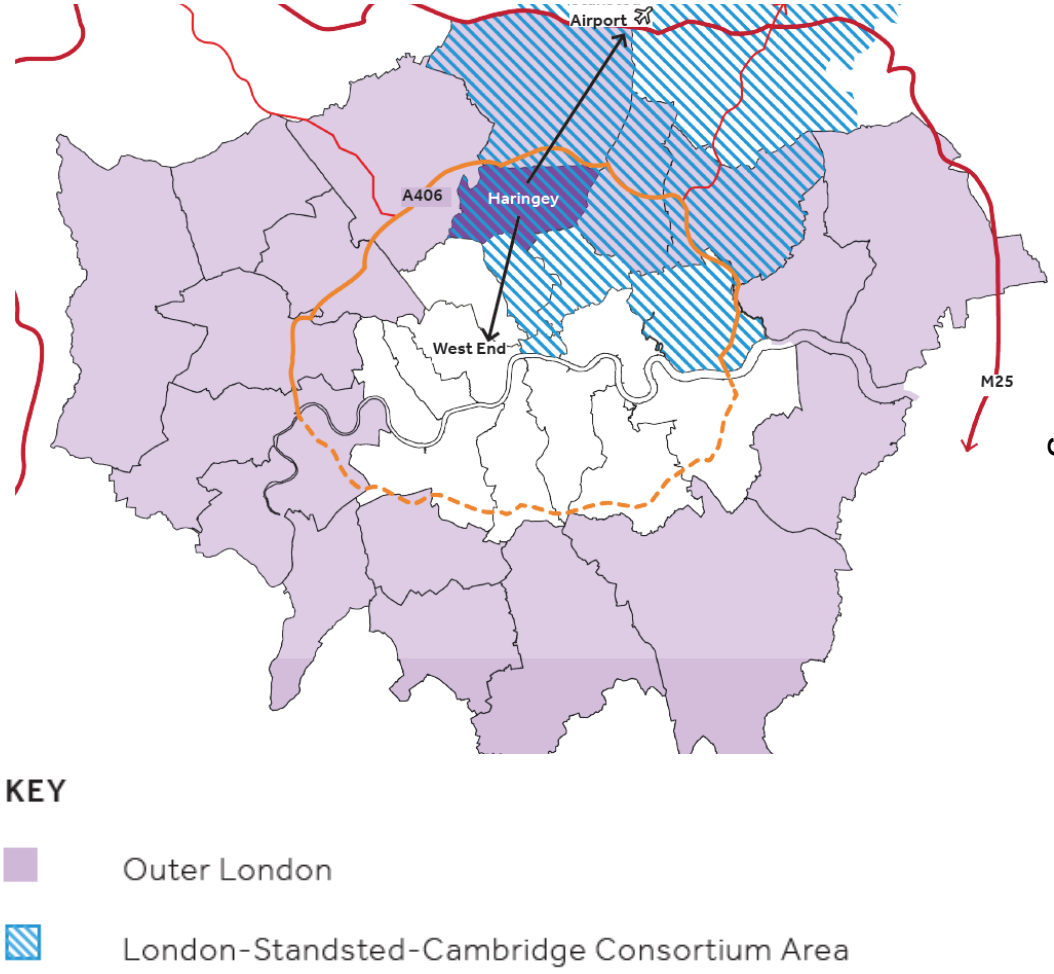
2. Borough Context

2.1 Spatial Context

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

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

Figure 1: Spatial Context



2.2 Policy Context

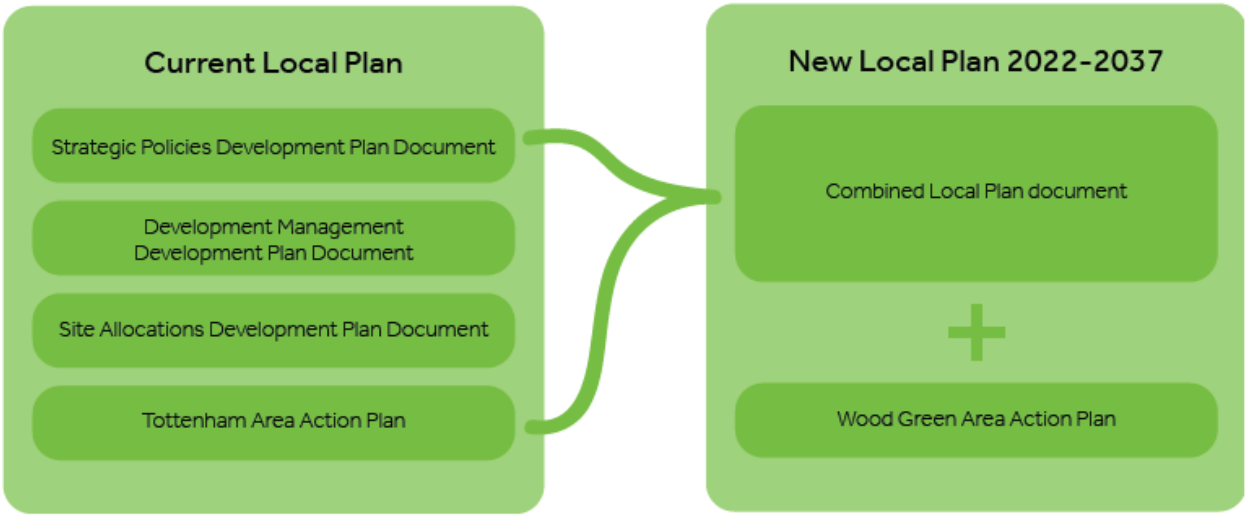
Section 19 of the Planning and Compulsory Purchase Act 2004 (as amended) requires each local planning authority to identify their strategic priorities and have policies to address them in their development plan documents. Under regulation 10A of The Town and Country Planning (Local Planning) (England)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

Haringey's Development Plan includes:

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

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

Figure 2: New Local Plan structure



3. People

3.1 Demographics

Context

National

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

- An overall stated purpose to contribute to the achievement of sustainable development – meeting the needs of the present without compromising the ability of future generations to meet their own needs
- An economic objective to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- A social objective to support strong, vibrant communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being
- An environmental objective to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

Regional

The London Plan 2019 (London Plan) seeks to deliver 'Good Growth' – growth that is socially and economically inclusive and environmentally sustainable, underpins the whole of the London Plan and each policy.

The concept is informed by six Good Growth objectives:

- GG1 Building strong and inclusive communities
- GG2 Making the best use of land
- GG3 Creating a healthy city
- GG4 Delivering the homes Londoners need
- GG5 Growing a good economy
- GG6 Increasing efficiency and resilience

The London Plan identifies Opportunities Areas – significant locations with development capacity to accommodate new housing, commercial development and infrastructure (of all types), linked to existing or potential improvements in public transport connectivity and capacity. Two Opportunities Area are identified in Haringey:

- Lee Valley
- Wood Green/ Haringey Heartlands

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

Local

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

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

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

Baseline

- The GLA's housing-led population projections estimate Haringey's 2020 population to be approximately 271,223, up from 255,438 in 2011[1]
- The borough has a higher proportion of younger people than London as a whole, which will increase pressure for housing and associated infrastructure. 51% of residents are under the age of 35 and 10% are aged 65 or over
- 4% of Haringey residents are gay or lesbian. This is above the London average of 3.1%. Haringey has the 9th largest gay and lesbian population of all local authorities in the country[2]
- Overall deprivation in the Borough is relatively high, with Haringey ranked as the 4th most deprived borough in London and the 49th most deprived local authority in England. The eight wards that make up Tottenham, which accommodate almost half of the people living in Haringey, are ranked among the 10 per cent most deprived in England[3]
- Almost half of our population and three-quarters of our young people are from ethnic minority backgrounds, and over 180 languages are spoken. Our population is the fifth most ethnically diverse in the country[4]. In 2018 Black and Ethnic Minority groups comprised 38% of the population with 26% identifying as Other White groups
- Tottenham is one of the most ethnically diverse areas in the country and has a relatively transient population. Over three quarters (78.9%) of the population are from a non-White British ethnic group, compared to 55.1% for London[5]

[1] GLA's housing-led population projections

[2] ONS Annual Population Survey, 2013-15

[3] https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

[4]

[5]

- 4,500 people in Haringey have a serious physical disability. Almost 5,000 people have sight loss which impacts on daily living and around 15,700 adults have a moderate or severe hearing impairment[6]
- There are nine libraries in Haringey, giving good access across the Borough
- There are 168 community buildings in the borough, falling within the public, private and voluntary sectors. The council owns 43 buildings that are leased for community use

Projections

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

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

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

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

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

Our social and community sector is facing some difficult challenges. The past decade has seen a London-wide trend of cultural venues and spaces closing down. This includes a 25% reduction in the number of pubs, which are often used as community hubs and have rooms to rent for social functions or meetings[7]. Rising rents may also put pressure on existing venues. The need for community facilities to accommodate a rising population and to help address deprivation and inequalities is likely to continue to increase.

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

Health and Equalities Impacts

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

[6] ONS Census 2011??

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

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

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

Issues, Opportunities and Objectives

The following key issue emerges from the context and baseline review:

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

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

3.2 Social Integration and Inclusion

Context

National

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

- Planning policies should aim to achieve healthy, inclusive and safe places which:
  - promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other
  - are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion
- Plans should be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees and be accessible through the use of digital tools to assist public involvement and policy presentation

Regional

The main messages from the London Plan include:

- A Good Growth objective of building strong and inclusive communities, building on the city's tradition of openness, diversity and equality
- Supporting the creating of inclusive neighbourhoods by embedding inclusive design into planning policies
- Contributing to regeneration by tackling inequalities and the environmental, economic and social barriers that affect the lives of people in the area, especially in Strategic and Local Areas for Regeneration.

- Ensuring that the social infrastructure needs of London's diverse communities are met, informed by a needs assessment.
- Support comprehensive regeneration of areas based on a thorough understanding of the demographics of communities and their needs
- Work with local Metropolitan Police Service 'Design Out Crime' officers to maintain a safe and secure environment and reduce the fear of crime

Local

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

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

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

Baseline

- Crime has been steadily declining across Haringey, but some neighbourhoods and groups remain more likely to fall victim to crime than others
- Crime is particularly prevalent in Northumberland Park. The challenge facing the Borough is two-fold: to tackle persistent problems including crime 'hotspots'; and to address public concerns about crime
- There is a spatial dimension to crime within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation
- Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery
- Haringey is a relatively deprived borough. It is ranked 49 out of the 317 local authorities in England with respect to deprivation and is the 4th most deprived in London as measured by the Indices of Multiple Deprivation (IMD) score 2019
- There is a marked divide between the east and west of the borough in terms of deprivation. The most deprived areas are heavily concentrated in the east, where more than 20% of the LSOAs (Lower Super Output Areas or small neighbourhood areas) fall into the 20% most deprived in the country. By comparison, in the west a very small proportion of LSOAs fall into that category, and in the westernmost wards there are none
- There is a marked disparity in employment and skills across the borough, following a similar pattern to overall levels of deprivation

- There is a concentration of employment deprived areas to the east of the borough, whereas areas to the south west of the borough are amongst the least employment deprived in England
- The Haringey Association of Voluntary and Community Organisations (HAVCO), provides support and promotes and develops Haringey's diverse voluntary and community sector organisations

Projections

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

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

The local economy will be severely impacted in terms of (un)employment and business viability, and poverty will increase, though the extent of the increase is not yet known.

The latest DWP local data (July 2020) shows a huge increase in Universal Credit declarations/ claims being made and individual claimants.

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

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

Health and Equalities Impacts

Crime and deprivation are important issues that have significant impacts on physical and mental health and wellbeing. There is a spatial dimension to crime and deprivation within the borough, with crime incidents, particularly incidents of violent crime, concentrated in places with high deprivation.

Young people are more likely to be both victims and perpetrators of violent crime and those aged 13-21 are more likely to be victims of personal robbery, and there is a strong gender dimension to violent crime with 1 in 3 violent crimes an incident of domestic violence.

The rate of youth violence has gone up in recent years and remains an urgent issue for the borough, that disproportionately affects African and Black- Caribbean communities, and boys in particular.[8]

Police data shows that while overall race and religious hate crime slightly decreased, incidences of anti-Semitic, Islamophobic, homophobic and transgender hate crime all

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

increased in Q1-Q3 2019 compared with the nine months prior[9].

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

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

Issues, Opportunities and Objectives

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

- There is a need to address unemployment in order to tackle rates of crime, and given the spatial patterns of deprivation, there will be different actions needed to help tackle these issues including improving access not only to jobs but also community services within these areas
- Haringey has a wealth of voluntary and community services that contribute to positive change in the community
- There is an opportunity to use regeneration and investment in key areas such as Wood Green and Tottenham to address issues of crime and deprivation
- Valuing the contribution of communities and the voluntary and community sector to the planning process

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

- Support strategic improvements to areas with highest deprivation which could lead to benefits in more disadvantaged parts of the borough
- Support the provision of social infrastructure to help address low levels of educational attainment and high levels of deprivation.
- Reduce crime and the perceptions of safety to improve the ability of our diverse population to fully participate in the community

3.3 Health

Context

National

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

- Enabling and supporting healthy lifestyles through provision of green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling.

[9] Metropolitan Police 2019 'Hate crime dashboard': https://www.met.police.uk/sd/stats-and-data/met/hate-crime-dashboard/ - It should be noted that this decrease represents a decrease in reported incidents of hate crime, and not necessarily a decrease in hate crime itself. One implication of this is that people may, in fact, be less confident in how to report this type of crime to the police.

- Taking into account and supporting the delivery of local strategies to improve health, social and cultural well-being for all sections of the community.
- Helping to deliver access to high quality open spaces and opportunities for sport and physical activity to contribute to the health and well-being of communities.

Regional

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

The Health Inequalities Strategy (2018) presents a London-wide strategy for tackling identified 'unfair differences' in health outcomes across the city, focussing on the five core themes of healthy children, healthy minds, healthy places, healthy communities and healthy living.

Local

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

Baseline

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

However, health inequalities in Haringey are evident; the most deprived areas in the east of the Borough tend to experience the poorest health. Health inequality is most acute in Tottenham, with a nine-year gap in life expectancy compared with the rest of the Borough. The population in the west of the borough is predominantly 'older' than the east, which will have implications for the provision of educational, health and recreational facilities.

Other key indicators find that:

- Childhood obesity rates in the Borough are higher than the London and England average. One in four children aged 4-5 and one in three children aged 10-11 are overweight or obese. These children are more likely to live in the east of the Borough. About 112,865 adults in Haringey are estimated to be overweight or obese
- Health inequalities are more likely amongst certain groups of residents, including those with protected characteristics. For example, obesity is more prevalent amongst black and minority ethnic groups with 41.4% of

BME children overweight or obese compared to 23.4% of White British children

- Women in Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years)
- There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough. Men who live in the most deprived areas in the borough die on average 7.7 years younger than those in more affluent areas

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

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

Projections

An estimated 7,842m² of space is required across the borough by 2026 to meet need[10]. Based on 1,800 people per GP, there are identified future shortfalls in Wood Green and large parts of the east of the borough including Northumberland Park, Harringay, St. Ann's, Seven Sisters, West Green and Tottenham Hale[11].

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

Health and Equalities Impacts

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

Health inequalities are more likely amongst certain groups of residents, including those with the protected characteristics, e.g. obesity is more prevalent amongst black and minority ethnic groups with 41.4% of BME children overweight or obese compared to 23.4% of White British children; women in

10

11

Haringey live longer than men but spend more years of their lives in poor health (23 years versus 20 years).

There is a distinct spatial element to health inequalities with mental illness, levels of physical activity and obesity a greater concern in more deprived parts of the borough in the centre and east. The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 20 years, with a view to ensuring essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives. It will be important to promote an increased uptake in active travel (walking and cycling) and enable investment in leisure and community facilities. This will benefit all groups.

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

- Promote improvements in physical and mental health, particularly in areas of health and social deprivation
- Reduce differentials in life expectancy and healthy life expectancy across the borough
- Address the social determinants of health
- Improve access to health and social care services and facilities, particularly in areas of deficiency such as the centre and east of the borough

Issues, Opportunities and Objectives

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

- The need to address the social determinants of health by ensuring homes and buildings are healthy, the environment enables active and healthy lifestyles and is accessible and inclusive, people have access to open spaces, nature and sports facilities, and addressing deprivation and improving the social and economic conditions of residents
- The need to secure high-quality new health facilities moving away from practices being run in terraced houses and converted shop fronts.
- The needs of Haringey's ageing population will be a major consideration in planning for the borough in the next 15 years to ensure essential services are within easy access for all. Flexible and appropriate design of housing, accessible community facilities and public realm design will be required in enabling older people to live healthier and independent lives.

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

- Contribute to the physical and mental health and wellbeing of residents
- Address the social determinants of health including housing, environment, and economic and social conditions of residents
- Improve quality of, and access to, health facilities

- Support the provision of quality, affordable and healthy food

3.4 Education

Context

National

The main message from the National Planning Policy Framework (NPPF) is that providing a 'sufficient choice of school places is of 'great importance' and there is a need on the part of planning authorities to take a 'proactive, positive and collaborative approach' towards achieving this.

Regional

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

Local

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

Baseline

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

- The percentage of Haringey residents with no qualifications (8.6%) is not particularly high, but there are localised issues. In Tottenham Hale 22.45% of residents aged 16 and over have no qualifications
- In general, children and young people who live in the more deprived areas of Haringey tend to have a lower level of achievement than those that are from more affluent backgrounds. Educational attainment is significantly lower than the London average and lowest in White Hart Lane, Northumberland Park and Seven Sisters
- Post-16 attainment in Haringey is improving but

opportunities for high quality academic opportunities in the east of the borough and in the sub-region are limited. 85% of those young people in secondary schools feel they have to leave the borough for post-16 education. The 2020 School Place Planning Report identified that 282 students from Haringey studied a vocational course in borough. This compares with 844 students from Haringey studying a vocational course out of borough

- Although levels of education are improving in the borough, certain groups, including those with protected characteristics, can face greater barriers to educational achievement than others. For example, children who have special education needs and/or disability (SEND) tend to have lower levels of attainment
- The Adult Participation in Leaning Survey 2019[12] notes a decade long decline in the number of adults participating in learning. There are persistent inequalities in learning, with the adults who could most benefit from participating in learning being the least likely to do so. Those in lower social grades, those with fewer years of initial education, and those furthest from the labour market remain under-represented in learning. Participation declines with age, with older adults being significantly less likely to participate in learning.

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

Projections

It is now clear that we are over a recent rise in demand for primary school places and key future themes will be managing surpluses of places in primary schools, whilst safeguarding future provision and diversity in provision, alongside building additional capacity for Haringey secondary schools.

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

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

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

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

Health and Equalities Impacts

Education is an important issue, recognising that although levels of education are improving in the borough, certain groups, including those with protected characteristics, can face greater barriers to educational achievement than others, e.g. children who have special education needs and/or disability tend to have lower levels of attainment.

As a general rule children and young people who live in the more deprived areas of Haringey have lower levels of attainment than their more affluent peers (particularly the case for children from Black and other ethnic minority groups and children who are eligible for free school meals.

Inequal patterns also apply to adults where the lower the social grade, the older the person and the less education someone has, the less likely they will access adult learning.

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

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

Issues, Opportunities and Objectives

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

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

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

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

- Improve quality of, and access to, education and training facilities

4. Place

4.1 Air Quality

Context

National

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

- Planning policies should sustain and contribute towards compliance with relevant limit values or national

objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.

- Opportunities to improve air quality or mitigate such impacts should be identified, such as through traffic management, and green infrastructure provision and enhancement. As far as possible opportunities should be considered at the plan-making stage to ensure a strategic approach and limit the need for issues to be reconsidered when determining individual applications.
- Significant development should be focused on locations which are or can be made sustainable, through limiting the need for travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions and improve air quality and public health.
- New and existing developments should be prevented from contributing to, being at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution.
- Development should, wherever possible, help to improve local environmental conditions such as air quality, taking into account relevant information.

The Air Quality Standards Regulations 2010 transpose into UK law the Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC) which sets legally binding limits for outdoor concentrations of major air pollutants which impact public health such. The UK also has national emissions reduction commitments for overall UK emissions of 5 main pollutants: fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide and non-methane volatile organise compounds by 2020 and 2030.

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

The Clean Air Strategy 2019[13] sets out the comprehensive actions required by all parts of government that is required to meet the UK's emission reductions commitments. As part of this strategy, the Government has put forward an Environment Bill which would, among other things, amend the Environment Act 1995 to give local authorities powers to enforce air quality targets.

Regional

The main messages from the New London Plan include:

- Policy SI1 (Improving air quality) which states that development plans should seek opportunities to identify and deliver further improvements to air quality and should not reduce air quality benefits that result from the Mayor or boroughs' activities to improve air quality.

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

Development proposals should not lead to further deterioration of existing air quality, create new areas that exceed air quality limits or delay the date at which when they will be complied with, or create unacceptable risk of high levels of exposure to poor air quality.

- Policy SI2 (Minimising greenhouse gas emissions) which states that major development should be net zero-carbon.
- Policy GG3 (Creating a healthy city) which seeks to improve Londoners' health and reduce health inequalities by improving London's air quality, reducing public exposure to poor air quality and minimising inequalities in levels of exposure to air pollution.

The London Environment Strategy 2018 [14] aims include having the best air quality of any major world city by 2050, going beyond the legal requirements to protect human health and minimise inequalities. There are a number of things the Strategy says that London boroughs can do to help achieve its aim. These include:

- Reducing pollution from new developments through planning (especially those not referred to the Mayor), as well as from existing buildings
- Improving the public realm for walking and cycling
- Targeted measures at pollution hotspots, such as vehicle restrictions and green infrastructure
- Supporting installation of infrastructure to fuel zero emissions vehicles

Local

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

Reducing the impact of road vehicles on air pollution including through parking controls, parking charges and improving the environmental emissions of the council and partners' vehicle fleets

- Reducing the impacts of emissions from developments and buildings on the local community through planning controls and sustainable design
- Encouraging residents to make choices that minimise air pollution such as such as travelling by walking, cycling and using public transport
- Supporting all schools to reduce the impact of air pollution on pupils

Local Plan Policy DM23A-C Environmental Protection: Air Quality requires all development proposals to consider air quality and improve or mitigate the impact on air quality in the borough and for the occupiers of the building and users of the development. Air quality assessments are required for all major

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

development and other development proposals where appropriate.

The Air Quality Action Plan (2019-2024)[15] sets out a detailed set of actions and outputs/ targets.

Baseline

Regional

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

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

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

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

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

Local

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

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

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

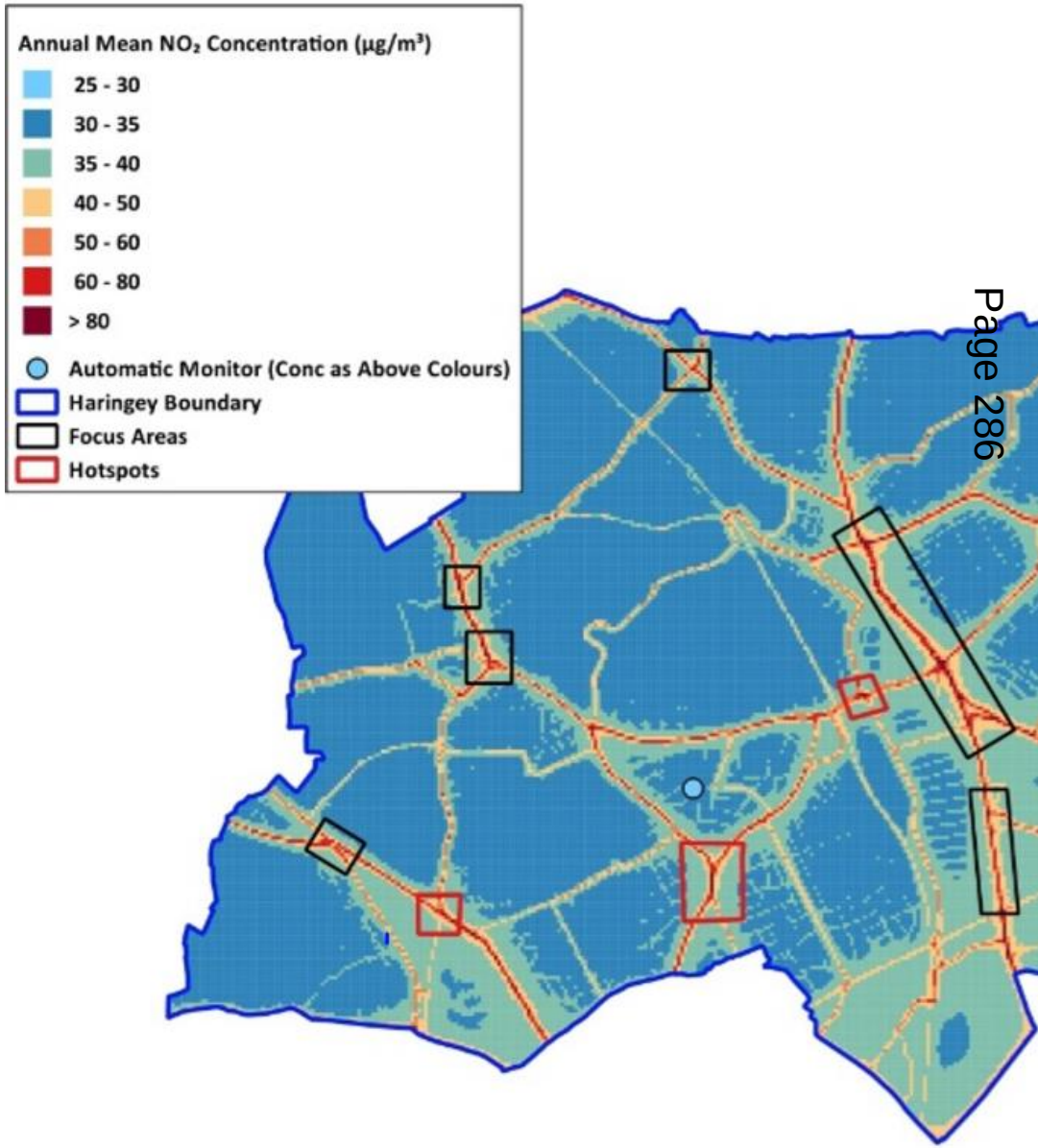
Haringey operates two automatic monitoring stations, one Roadside site on High Road, Tottenham and another in a south borough local park and classified as a background site. Annual mean NO_2 concentrations at the Roadside site have been trending downwards since 2014, with the 2018 results of 39µg/m^3 just below the annual objective of less than 40µg/m^3. Levels at the background site, meanwhile have been well below the annual objective, hovering at around 25µg/m^3 since 2013[16].

Haringey also operates 15 non-automatic monitoring sites for Annual Mean NO_2 concentrations, including at vulnerable locations such as schools and GP surgeries. These have largely remained at steady levels or slightly decreasing since 2014. In 2018, three of roadside sites had annual concentrations in excess of the objective[17].

Projections

Future growth in housing and employment has the potential to negatively impact air quality as a result of pollutants from increased traffic flows. New development in sustainable locations and planned investment in sustainable transport infrastructure could help support the take up of sustainable transport and a reduction in pollution levels. The long-term impact of Covid-19 is unclear. Traffic flows and associated pollutants may reduce as more people work from home, however, more people may also return to car use to avoid public transport and the transmission risks associated with it.

Figure 3 Modelled map of annual mean NO2 concentrations including monitoring locations and Air Qu



[16] Haringey Council (2019) Air Quality Report 2018 [Online] available at https://www.haringey.gov.uk/business/licensing-and-

Health and Equalities Impacts

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

The adverse effects of air pollution fall disproportionally on disadvantaged communities, which are generally home to more minority ethnic groups. People in the most deprived areas are more likely to experience higher levels of air pollution. This is borne out in Haringey with air pollution levels in the more deprived east of the borough higher than in the west. The young, old and those with pre-existing health conditions are

also particularly impact. There is increasing evidence of a link between exposure to pollution and dementia[18].

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

- Reduce inequal access to clean air

Issues, Opportunities and Objectives

The following key issue emerges from the context and baseline review:

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

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

- Reduce emissions and concentrations of harmful atmospheric pollutants
  Deliver development that does not expose current and future residents to poor air quality

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

4.2 Climate Change Mitigation

Context

National

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

- An overarching environmental objective to mitigate and adapt to climate change, including moving to a low carbon economy.
- The need to support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. Shaping places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the

conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

- Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures in line with the objectives and provisions of the Climate Change Act 2008.
- Plans should provide a positive strategy for renewable and low carbon energy sources that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily.
- Plans should consider identifying suitable areas for renewable and low carbon energy sources and supporting infrastructure.
- Plans should identify opportunities for development to draw energy from decentralised, renewable or low carbon energy supply systems and for co-locating potential head customers and suppliers.
- Plans should support community-led initiatives for renewable and low carbon energy.

In addition, the government has set out further planning practice guidance on climate change and renewable and low carbon energy[19].

The Climate Change Act 2008, as amended in 2019, sets out a national statutory target of reaching net zero emissions by 2050. There is an expectation within the NPPF that the planning system will contribute to meeting the challenges of climate change in 'in line with the objectives and provisions of the Climate Change Act 2008'[20].

The Committee of Climate Change has produced a report entitled 'How Local Authorities can Reduce Emissions and Manage Climate Change Risk'[21] to support realisation of the Climate Change Act's targets.

Section 19 of the Planning and Compulsory Purchase Act 2004 sets out a duty on development plans to include policies designed to secure that the development and use of land in the local authority's area contribute to the mitigation of, and adaptation to, climate change.

The Planning and Energy Act 2008 sets out powers for local authorities to require a proportion of the energy need related to new development come from renewable or low-carbon generation in the locality of the development. The Act also allows local authorities to require standards for energy efficiency in new buildings and beyond those in the Building

[19] [Insert reference]
[20] [Insert reference]
[21] CCC (2012), 'How local authorities can reduce emissions and manage climate risks [Online], available from: https://www.theccc.org.uk/publication/how-local-authorities-can-reduce-emissions-and-manage-climate-risks/

Regulation. This power has since been removed in principle, but as the government has not yet set a commencement date for the repeal this power it currently remains in place, though subject to some limitations.

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

Regional

The main messages from the London Plan include:

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

Climate change is a thread that runs through much of the New London Plan. Other relevant policies include GG3 – Creating a healthy city, GG4 – Delivering the homes Londoners need, G4-Open space, G5- Urban Greening, G6- Biodiversity and access to nature, G7-Trees and woodlands, G8-Food growing, SI5-Water infrastructure, SI6-Digital connectivity infrastructure, SI17-Reducing waste and supporting the circular economy and T-Transport.

The London Environment Strategy 2018 [22] sets out an aim for London to be a zero carbon city by 2050 with energy efficient buildings, clean transport and clean energy. One of the ways it seeks to do this is by making sure that new developments are zero carbon from 2019, with clean supplies of energy and high energy efficiency designed in from the start.

The Mayor's 1.5C Compatible Climate Action Plan[23], looks at the different scenarios London can take to reduce its emissions and reach the zero carbon target.

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

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

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

Local

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

- Requiring all new development to achieve the Zero Carbon Standard
- Promoting Ultra Low Emission Vehicles
- Leading on the delivery of an energy network where more sustainable energy is generated for use within the borough.

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

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

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

Baseline

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

Haringey has one of the lowest emissions per capita amongst our neighbouring boroughs, at 2.5tCO_2capita. Its per capita figure is considerably lower than Greater London, at 3.3 tCO_2capita, and the UK, at 4.5 tCO_2capita[24].

[24] 2019 Carbon Report

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

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

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

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

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

Projections

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

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

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

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

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

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

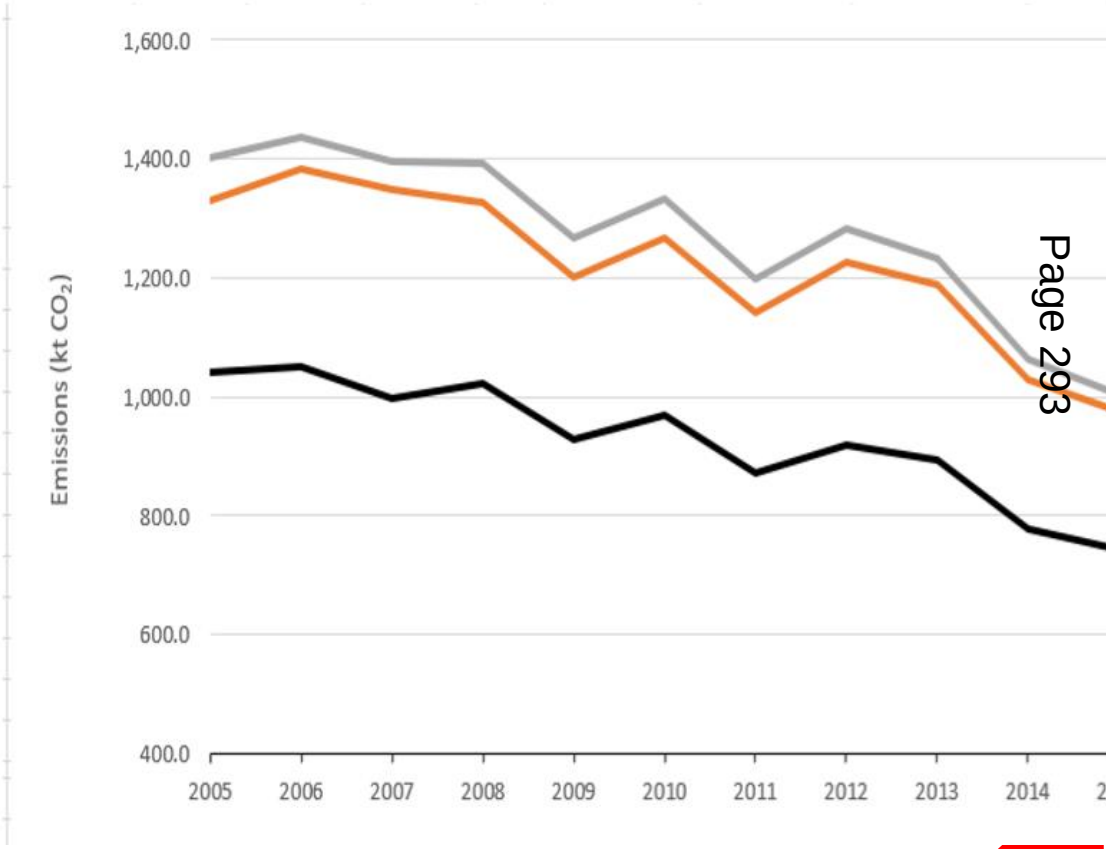


Figure 5 Comparison of energy demand between high uptake and low update of energy

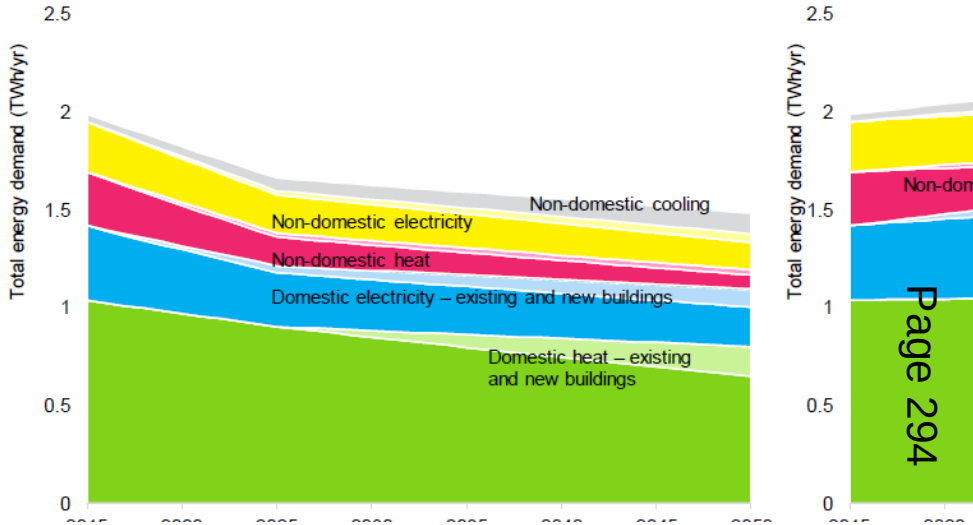
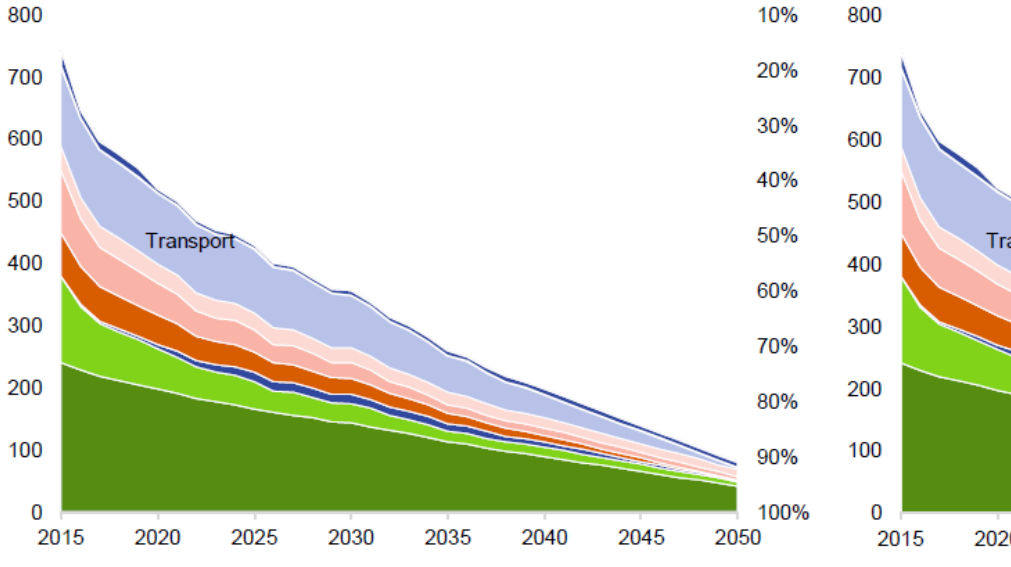


Figure 6 Comparison of carbon emission reduction in the transport sector between "near zer megatons of CO_2e



Health and Equalities Impacts

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

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

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

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

- Contributes to the provision of smart and affordable energy systems

- Reduce impacts of fuel poverty, particularly for vulnerable groups

Issues, Opportunities and Objectives

The following key issue emerges from the context and baseline review:

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

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

- Support reductions in greenhouse emissions to meet national, regional and local net zero carbon targets.
- Support renewable and low carbon energy generation.

4.3 Climate Change Adaptation

Context

National

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

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

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

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

For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report[25] containing six priority risk areas requiring additional action in the next five years:

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

The Flood and Water Management Act (2010)[26] sets out measures to ensure that risk from all sources of flooding, not just rivers and seas, are managed more effectively. This includes: incorporating greater resilience measures into the design of new buildings; utilising the environment in order to reduce flooding; identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; roll back development in coastal areas to avoid damage from flooding or

[25] DEFRA (2017): 'UK Climate Change Risk Assessment Report January 2017', [online] available to download from: <https://www.gov.uk/government/publications/uk-climate-change-risk-assessment-2017>

[26] Flood and Water Management Act (2010) [online] available at: http://www.legislation.gov.uk/ukpga/2010/29/contents Accessed Aug 2017

coastal erosion; and creating sustainable drainage systems (SuDS).

The Committee of Climate Change published a 2012 report entitled 'How Local Authorities can Reduce Emissions and Manage Climate Change Risk'[27] which emphasises the crucial role councils have in helping the UK meet its carbon targets and preparing for the impacts of climate change. It outlines specific opportunities for reducing emissions and highlights good practice examples from a number of local authorities.

Regional

The main messages from the London Plan include:

- Policy GG6 (Increasing efficiency and resilience) looks to ensure buildings and infrastructure are designed to adapt to a changing climate, making efficient use of water, reducing impacts
- Policy SI4 (Managing heat risk) which requires all development proposals to minimise adverse impacts on the urban heat island and for major development proposals to demonstrate a reduction in the potential for internal overheating and reliance on air conditioning systems in according with its cooling hierarchy.
- Policy SI12 (Flood Risk Management) which requires current and expected flood risks from all sources to be managed in a sustainable and cost-effective way in collaboration with the Environment Agency, the Lead Local Flood Authorities, developers and infrastructure developers.
- Policy SI13 (Sustainable Drainage) which requires Lead Local Flood Authorities through their Local Flood Risk Management Strategies and Surface Water Management Plans – areas where there are particular surface management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.

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

Local

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

Local Plan Policy DM28: Protecting and Enhancing Watercourses and Flood Defences: Includes requirements to for development to be set back from watercourses, meet the

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

objectives of the Thames River Basin Management Plan and secure environmental enhancements and avoid a deterioration in water quality.

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

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

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

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

Baseline

Like most London boroughs Haringey has areas that are at risk of flooding. This is in part owing to the watercourses in the borough, including the River Lee, Pymmes Brook and Moselle Brook. According to the Environment Agency, approximately 9% of land in Haringey has a 1 in 100 year probability of flooding from rivers. The main sources of flooding are:

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

Haringey's Strategic Flood Risk Assessment has identified surface water run-off as the greatest risk to the borough with regard to flooding. The SWMP identifies 9 Critical Drainage Areas in the borough at risk of surface water flooding, and sets the basis for bespoke water management policy approaches and projects in these areas.

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

Projections

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

Climate change will bring about changes in rainfall with warmer drier summers and wetter warmer winters. Rainfall may occur in heavier downpours which could lead to more flooding and droughts. The UK Climate Projections 2009 predict that by 2080 the East of England will experience a 20% increase in

winter rainfall leading to increased winter flooding and a 20% decrease in summer rainfall leading to summertime droughts.

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

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

Health and Equalities Impacts

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

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

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

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

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

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

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

- Ameliorate the impact of flooding and overheating, particularly those most vulnerable to its effects

Issues, Opportunities and Objectives

The following key issues emerges= from the context and baseline review:

- Surface water runoff is the source of flood risk that potentially has the greatest effect in Haringey and is the flooding most likely to be experienced.
- Increased use of sustainable urban drainage systems provides an opportunity to manage and mitigate flood

risks as does directing residential development away from the areas of highest risk.

- Haringey will continue to experience higher temperatures and more frequent heat waves.
- There is an opportunity to be proactive in ensuring the built and natural environment is designed in a way that keeps inhabitants and the surrounding area cool during hot weather.

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

- Adapt to current and future flood risk
- Minimise the potential for overheating

4.4 Water Resources and Water Quality

Context

National

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

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

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

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

Regional

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

The main messages from the London Plan include:

- Policy SI 5 (Water infrastructure) which requires Development Plans to A) promote improvements to water supply infrastructure to contribute to security of supply B) promote the protection and improvement of the water environment in line with the Thames River Basin Management Plan, and take account of Catchment Plans C) support wastewater treatment infrastructure investment to accommodate London's growth and climate change impacts. Development Plans should be informed by Integrated Water Management Strategies at an early stage.
- Policy SI12 (Flood Risk Management) which requires current and expected flood risks from all sources to be managed in a sustainable and cost-effective way in collaboration with the Environment agency, the Lead Local Flood authorities, developers and infrastructure developers.
- Policy SI13 (Sustainable Drainage) which requires Lead Local Flood Authorities through their Local Flood Risk Management Strategies and Surface Water Management Plans to identify areas where there are particular surface management issues and aim to reduce these risks. Increases in surface water run-off outside these areas also need to be identified and addressed.
- Policies SI 14-17 London's waterways: These policies set out how Development Plans should address the strategic importance of London's network of waterways, including protecting and enhancing the use of water transport, general use and enjoyment of the waterways and by supporting river restoration and biodiversity improvements.

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

Local

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

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

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

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

Baseline

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

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

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

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

Thames Water provides the wastewater services for Haringey. All water companies are now committed to preparing Drainage and Wastewater Management Plans (DWMP) for the first time. The Thames DWMP will be ready for consultation by summer 2022. Haringey falls into two catchments. Most of the borough is in a catchment served by the Deephams Sewage Treatment Works, with the south-western part of the borough served by the Beckton Sewage Treatment Works. A screening exercise in 2019 identified both catchments as high priority areas as they breached 10 and 12 of the 17 indicator thresholds respectively. The indicators looked at flooding, pollution and sewage treatment work quality compliance [28]

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

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

Projections

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

Health and Equalities Impacts

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

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

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

- Improve access to our waterways

Issues, Opportunities and Objectives

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

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

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

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

4.5 Biodiversity and Open Spaces

Context

National

The National Planning Policy Framework (NPPF) emphasises the need to:

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

The NPPF also recognises the health and wellbeing benefits of access to high quality open space and states that planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.

The NPPF also emphasises the 'great importance' of Green Belts and encourages local authorities to plan positively to enhance beneficial use.

Regional

The main messages from the London Plan include:

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

Local Plan

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

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

Baseline

The borough has 60 areas of Sites of Importance for Nature Conservation (SINCs), which vary in terms of importance/sensitivity. Haringey also has five Local Nature Reserves (LNRs) and waterways also offer a valuable habitat. The Lee Valley Regional Park straddles the eastern boundary of the borough and is home to European designated sites and is a Site of Special Scientific Interest.

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

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

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

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

Projections

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

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

On the plus side, the increased scale of development could fund strategic investment in green infrastructure (including the

Green Grid) to help create a resilient network of green corridors and improve open space. This would lead to positive effects compared to the baseline, particularly when focused in the east of the borough.

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

Health and Equalities Impacts

Environmental quality is an important issue, recognising that the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality or access to open space). Environmental issues are more concentrated in certain parts of the borough and whilst open space is fairly evenly distributed across the borough, there is a lack of access in certain parts of the east, including to play space and allotment which can have impacts on health.

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

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

Issues, Opportunities and Objectives

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

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

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

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

- Achieve biodiversity net gain
- Secure an increase in open space and play space across the borough
- Reduce deficiencies in open space and play space
- Protect open space and biodiversity

4.6 Land and Soils

Context

National

The National Planning Policy Framework (NPPF) encourages the effective use of land through the reuse of previously developed land, provided that this is not of high environmental value. In also recognises the need to protect and enhance soils; prevent new or existing development from contributing to or being adversely affected by the presence of unacceptable levels of soil pollution or land instability; and remediate 'despoiled, degraded, derelict, contaminated and unstable land', where appropriate.

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

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

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

Regional

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

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

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

Local

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

Baseline

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

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

Projections

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

Health and Equalities Impacts

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

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

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

Issues, opportunities and objectives

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

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

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

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

- Promote the efficient and sustainable use of land and natural resources

4.7 Townscape and Landscape

Context

National

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

- Giving great weight to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty
- Strategic policies should set out an overall strategy making provision for 'conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure
- Planning policies and decisions should ensure that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation of change (such as increased densities)'
- Planning policies and decisions should contribute to and enhance the natural and local environment by:
    - protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils
    - recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland; and
    - remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.

Regional

The main messages from the London Plan include;

- supporting the designation of Metropolitan Open Land where it contains features or landscapes of either national or metropolitan value (Policy G3)
- protecting strategic views of significant buildings, urban landscapes or riverscapes that help to define London at a strategic level (Policy HC3)
- identifying and designating in their Local Plans and strategies, local views using the principles of Policy HC4 – London View Management Framework

Local

Policy DM5 of the Local Plan identifies and protects locally significant views and vistas while Policy DM6 sets out

expectations for building hights including ensuring that taller buildings protect and preserve existing locally important and London wide strategic views.

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

Baseline

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

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

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

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

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

Projections

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

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

Health and Equalities Impacts

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

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

- Help build a sense to place to promote social integration

Issues, Opportunities and Objectives

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

- Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes

4.8 Design

Context

National

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

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

Regional

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

It also seeks to support the use of modern methods of construction (MMC) to enable faster housing construction. MMC also offers the opportunity for a cheaper supply of housing and/or a greater level of affordable housing delivery.

The London Plan calls for Local Authorities to maintain and enhance the contribution of the cities 'built, landscaped and buried heritage' to London's environment, culture, and economy.

Local

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

Baseline

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

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

To assist in delivering high quality development the Council has established a Quality Review Panel (QRP) which brings together a team of independent professionals from a range of backgrounds to scrutinise major and controversial development proposals. The QRP advises applicants, Council officers and the Planning Committee on their consideration of how well a development scheme is meeting the principles of the Haringey Development Charter.

Projections

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

Health and Equalities Impacts



Accessibility is an important issue, recognising that improved access to services and facilities is key to ensuring equality of opportunity, and certain groups may suffer particularly from reduced accessibility / activity (e.g. those less able to travel due to mobility issues or low income). Good design of new buildings and the public realm can help improve access to town centre facilities and community infrastructure for existing and future residents, and provide homes fit for all.

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

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

Issues, Opportunities and Objectives



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

- There may need to be a new design guidance introduced to ensure design excellence and to integrate new developments into existing contexts so that they are visually and physically compatible

- The need to optimise densities and deliver densification for the borough to meet its growth targets.

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

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

- Support excellent design that is accessible and inclusive

4.9 Heritage and Culture

Context

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

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

Regional

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

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

Local

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

Baseline

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

Our Draft Local Heritage List is currently under review and we have a programme for preparing Conservation Area Appraisals

and Management Plans (CAAMPs) for all our conservation areas. Haringey currently has 14 adopted appraisals which have been performing well, including 4 recently adopted in 2019. Work has also commenced on a further 7 appraisals: Trinity Gardens, Wood Green Common, Bowes Park, Muswell Hill, St Ann's, Lordship Lane and Clyde Circus Conservation Areas.

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

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

The borough benefits from good cultural infrastructure, including:

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

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

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

Projections

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

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

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

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

Health and Equalities Impacts

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

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

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

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

- improves equality of access and engagement with our heritage assets and cultural activities

Issues, Opportunities and Objectives

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

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

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

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

4.10 Transport

Context

National

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

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

- The potential impacts of development on transport networks can be addressed
- Opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised
- Opportunities to promote walking, cycling and public transport use are identified and pursued
- The environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account
- Patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.

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

Regional

The main messages from the London Plan include:

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

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

- Significantly reducing nitrogen dioxide emissions to 20 tonnes per year and particulate matter emissions to 19 and 2 tonnes per year for PM10 and PM2.5 respectively
- At least 88% of daily journeys will include walking, cycling and public transport
- At least 70% of residents do at least 20 minutes of active travel every day by 2041
- No deaths or serious injuries on the transport network (Vision Zero)
- Reduce step-free journey time by 75% by 2041 based on 2015 levels

Local

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

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

- Outcome 1: A public transport network that is better connected, has greater and more efficient capacity and is more accessible, supporting our growth ambitions
- Outcome 2: Active travel the default choice, with more people choosing to travel by walking or cycling
- Outcome 3: An improved air quality and a reduction in carbon emissions from transport
- Outcome 4: A well maintained road network that is less congested and safer

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

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

Baseline

Public Transport

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

Of the above, all provide radial links aside from the Barking – Gospel Oak Overground line which, together with five other London Overground routes, forms an orbital network, and links the Borough to a total of 84 stations and 19 London Boroughs via the Overground services alone. Finsbury Park, Tottenham Hale and Seven Sisters/South Tottenham are identified as key strategic interchanges in the Mayor's Transport Strategy.

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

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

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

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

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

Road Network

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

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

The Council has been working to provide alternatives to individual car use. There are now 75 car club bays in operation in the borough and the Council is in the process of completing a multi operators contract for additional bays. There will be a total of 44 new car club bays to be installed. Haringey is also part of the DriveNow 'floating' car club service. It is a floating model, which means vehicles do not need to be picked up or returned to a specific parking space. It has a fleet of 250 vehicles across the 4 borough operational area, including 50 BMW i3 electric vehicles.

The Council has a policy to promote the uptake of electric vehicles through the implementation of charging infrastructure off street in public car parks and on street parking. The Council

installed 38 new charging points in late 2018 across the borough. We now have 54 charging points in the borough.

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

Walking and Cycling Network

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

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

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

Safety

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

Climate Change

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

Projections

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

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

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

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

The number of cars owned in London is projected to decrease over the period 2016 to 2021 falling further than the lowest recorded in 2014. It is predicted that there will be 4297 fewer cars owned in the borough by 2021 falling from 64,897 to 60,600. This is predicted to drop a further 2000 to 58,600 by 2041.

Funding uncertainty remains for Crossrail 2. However if

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

Health and Equalities Impacts

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

Main roads pass through some of the most deprived communities, creating environments that are not inclusive to all, with roads that are intimidating and difficult to cross. People from more deprived areas, some ethnic minorities, disabled people, children and older people are disproportionately affected by road danger. 80% of all deaths and serious injuries occur to people walking, cycling or riding motorcycles. 73% of collisions resulting in death or serious injury for those on foot, bike or motorbike in London take place at junctions.

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

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

Issues, Opportunities and Objectives

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

- Projected increases in population and housing will put considerable strain on transport and other infrastructure particularly in the growth areas of Tottenham and Wood Green. Without a shift to more sustainable modes of transport this will likely result in increased congestion, greater levels of air pollution and carbon emissions, and more severe parking pressures.
- The borough has excellent public transport links in general; however, accessibility is uneven with provision poorer in the west of the borough. There is also a lack of orbital links in the borough.
- Recent and anticipated investment in cycling infrastructure along with a low existing mode share means that there are significant opportunities to increase the proportion of cycling trips in the borough.
- Speed is a major contributory factor to people being killed or seriously injured in road traffic accidents

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

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

4.11 Noise Pollution

Context

National

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

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

Three types of noise are defined in the Noise Policy Statement for England (NPSE) (March 2010). These are:

- environmental noise which includes noise from transportation sources;
- neighbour noise which includes noise from inside and outside people's homes; and

- neighbourhood noise which includes noise arising from within the community such as industrial
- and entertainment premises, trade and business premises, construction sites and noise in the street.

Regional

The main messages from the London Plan include:

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

Local

Key provisions relating to noise effects in the Local Plan include Policy DM23 (Environmental Protection) which seeks to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution.

Proposals for potentially noisy development must suitably demonstrate that measures will be implemented to mitigate its impact.

Baseline

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

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

Figure 7 LAeq 16-hour road traffic noise levels in London Borough of Haringey 2012



Source: http://extrium.co.uk/noiseviewer.html

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

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

Projections

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

Health and Equalities Impacts

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

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

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

- Reduce inequalities in exposure to noise, vibration and disruption

Issues, Opportunities and Objectives

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

- Road traffic noise is the primary noise source in most parts of the borough
- Main areas affected by traffic noise in Haringey are along the main traffic routes through the Borough.

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

- Minimise noise and vibration exposure and disruption

4.12 Waste Management

Context

National

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

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

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

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

The European Commission has put forward a Circular Economy Package[29] which includes a 65% recycling target for municipal waste by 2030. Th UK has signed up to delivering these as part of Brexit.

Regional

The main messages from the London Plan include:

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

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

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

Local

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

- to ensure there will be adequate provision of suitable land to accommodate waste management facilities of the right type, in the right place and at the right time up to 2035 to manage waste generated in North London; and
- to provide policies against which planning applications for waste development will be assessed, alongside other relevant planning policies/guidance.

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

Baseline

Local Authority collected waste (previously termed municipal waste) includes all waste collected for recycling, composting, recovery and disposal from households in the North London area by the boroughs in their capacity as waste collection authorities. The amount of waste produced in North London between 2006/07 and 2012/13 fell despite the increase in population and dwelling stock, as shown in the below chart and it would appear to be related to the economic downturn during this period. 2013/14 saw a return to increasing waste volumes but this has not been sustained and the waste produced in the north London area has decreased again in 2018/19.

The NLWA Monitoring Data shows that in the year 2018/19, 8.5% of waste arising was sent to landfill, an improvement on the 2015/16 figure of 13%, meeting current targets. North London currently relies on the Energy from Waste facility at

Edmonton EcoPark in Enfield as the primary method of disposing of LACW that cannot be recycled or reused (63% of total local authority collected waste sent for energy recovery by incineration, 511,577 tonnes in 2018-19).

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

Construction and demolition waste comprised 15% of waste arisings in North London in 2016, while excavation waste comprised 26%.The largest proportion of construction and demolition waste arising in North London is managed via recycling (73%) and treatment (20%) facilities, with 7% sent directly to landfill. Recycling rates of construction and demolition waste are high due to the nature and value of the material. Excavation materials are primarily disposed of directly to landfill (53%) with the remainder managed through transfer stations (28%) or sent for treatment (19%). The London Plan includes a target of 95% recycling of construction, demolition and excavation waste.[30]

Projections

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

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

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

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

In November 2014 the NLW announced plans for the development of a new Energy Recovery Facility (ERF) - the North London Heat and Power Project - on their existing site at the Edmonton EcoPark in Enfield. This will replace the existing

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Energy from Waste (EfW) plant at the EcoPark that is coming to the end of its operational life.

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

Health and Equalities Impacts

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

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

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

Issues, Opportunities and Objectives

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

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

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

- Support move towards a circular economy

5. Housing

5.1 Housing

Context

National

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

- Support for strong, vibrant and healthy communities by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations
- Plans and decisions should apply a presumption in favour of development which means plans should positively seek opportunities to meet development needs of their area and that save for two exceptions the strategic policies within should provide for objectively assessed needs for housing
- Strategic policies in Plans should set out an overall strategy for the pattern, scale and quality of development and make sufficient provision for housing
- To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless

exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals

- Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)
- Where major development involving the provision of housing is proposed, planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership
- To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.
- Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- Local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement. They are also subject to a Housing Delivery Test which tracks delivery against the housing requirement over a rolling three-yar period.

Planning policy for traveller sites sets out the Government's planning policy for traveller sites. Key messages are:

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

Regional

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

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

The Mayor's London-wide Strategic Housing Market Assessment (SHMA) which underpins the London Plan 2019 identifies need for 66,000 additional homes per year. Table 4.1 of the Plan sets Haringey a minimum ten-year minimum housing target (2019.20 to 2028/29) of 15,920 homes which equates to 1,592 homes per year. Policy H1 sets out that this target must be included in boroughs' Development Plan Documents. To ensure that the targets are achieved it requires that boroughs prepare delivery focused Development Plans

and optimise the potential for housing delivery on all suitable and available brownfield sites.

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

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

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

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

Local

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

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

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

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

Baseline

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

- Older people with complex needs such as learning disabilities, mental health and substance misuse, and accessible sheltered housing units for those with physical disabilities.
- People with mental health conditions leaving hospital and/or secure units, and specific units for women being released / discharged from hospital.
- People with learning disabilities who require supported living units.
- Single homeless adults requiring move on accommodation, including those with complex needs.

- Vulnerable young people/care leavers with complex offending/gang related needs; young women at risk of exploitation; and smaller services for young people to learn independent living skills.
- Survivors of domestic violence, and particularly provision for women from BAME backgrounds and for women with disabilities.

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

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

Projections

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

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

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

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

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

Health and Equalities Impacts

The Haringey Fairness Commission Report noted secure, good quality housing as a foundation of a decent life and highlighted housing disadvantage as a key factor that contributes to

inequalities between different groups of residents in the borough.

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

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

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

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

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

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

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

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

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

- Contribute to increased supply of genuinely affordable homes
- Deliver homes to meet the full range of needs of Haringey's current and future population, including specific group needs such as older people, gypsies and travellers and those in need of supported housing
- Ensure that new homes are of a high quality and a suitable size and support health and well being
- Ensure that new homes are inclusive and accessible
- Ensure that new homes are served by appropriate infrastructure and located well in relation to key amenities such as public open space and other services and facilities

Issues, opportunities and objectives

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

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

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

- An increased supply of new homes
- An increased supply of affordable homes, particularly low-cost rented homes
- Delivery of a suitable housing mix to meets local need,
- High-quality, inclusive adequately sized homes
- A full range of housing types to meet local need, including specialist needs
- Homes in good locations with access to services, facilities and amenities

6. Economy

6.1 Economy and Employment

Context

National

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

- Ensuring sufficient land of the right type is available in the right places and at the right time; and identifying and coordinating development requirements.
- The need to meet demand for office and workspace floorspace over at least a ten-year period
- Addressing investment barriers such as infrastructure constraints and incorporate flexibility to account for changing circumstances, and enable response too economic changes

Regional

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

The main messages from the London Plan include:

- No net loss of capacity on Strategic Industrial Land
- Maintaining a sufficient supply of land and premises in different parts of London to meet current and future demands.
- Supporting mixed use development on employment land where appropriate and feasible

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

The Mayor's Economic Development Strategy sets an ambition for London to be the world capital of business, and to have the most competitive business environment in the world.

Local

The Haringey Regeneration Strategy sets out a key priority to develop a 21st century business economy that offers opportunities for sustainable employment and enterprise, to help make Haringey a place people want to work, visit and invest in.

The Local Plan supports new or intensified employment floorspace in designated employment areas and resists the loss of floorspace in SIL and LSIS, but does allow for other uses not traditionally employment focused in LSIS where this is exceptionally justified. On our other designated and non-designated land, a more flexible approach is taken, and mixed use, employment-led development can be allowed where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace.

Baseline

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

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

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

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

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

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

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

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

the fact it has a particularly strong cluster of fashion, textiles, art, music and small-scale manufacturing.

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

Projections

In the current environment, predictions are difficult, but taking a long term view key challenges will be in securing sustainable economic growth and business development, through increasing and diversifying employment opportunities, meeting the needs of different sectors of the economy and facilitating new land and business development. It is likely that the existing high prevalence of start-up of new businesses will continue to grow and employment growth will come primarily from leisure, the creative sector, and new office provision for SME's.

Health and Equalities Impacts

Economic inclusion is an important issue, recognising that labour market disadvantage is felt particularly acutely by particular groups of residents, including those with the protected characteristics. For example, the employment rate is lower for ethnic minorities, lone parents and women and is particularly low for those with mental illness or learning disabilities. Only 12% of residents with a long-term health problem or disability that significantly limits their day-to-day activities are in employment[31].

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

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

- Provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration
- Improve equality of access to jobs and training opportunities
- Enable disadvantaged people to obtain employment or upgrade their skills and workplace experience

Issues, Opportunities and Objectives

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

- There is a need to secure sustainable economic growth and business development, through increasing and

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

diversifying employment opportunities; meeting the needs of different sectors of the economy and facilitating new land for business development.

- There is a need to improve physical accessibility to jobs, support flexible working and encourage new businesses.
- Particular support for start ups and SMEs is important, including that this type of floorspace (particularly affordable) is delivered
- Ongoing training and development opportunities for all are vital
- However, there is a risk that there could be a loss of employment floorspace to new mixed use development

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

- Support a strong, diverse and resilient economy
- Ensure an adequate supply of employment land suitable for existing and new businesses
- Support for social enterprises, small businesses and the voluntary and community sectors
- Enable the delivery of affordable business premises

6.2 Town Centres

Context

National

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

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

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

Regional

The main messages from the London Plan include:

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

Local

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

- Metropolitan Centre: town centres with a focus on higher order comparison goods retailing, with higher density employment opportunities, leisure and residential developments. Wood Green is the only metropolitan centre within Haringey.
- District Centre: town centres with a focus on a viable range of functions, particularly convenience, leisure, local employment and workspace. There are five District Centres in Haringey, and one which partly lies within Haringey (Finsbury Park).
- Local Shopping Centres: these provide for the day-to-day needs of people living and working nearby. There are 38 of these centres in Haringey.

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

Baseline

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

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

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

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

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

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

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

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

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

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

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

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

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

Figure 8 Summary Table of High Street Performance

Summary Table of High Street Performance

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

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

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Projections

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

town centres away from being primarily retail destinations will accelerate.

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

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

Health and Equalities Impacts

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

There is a clear spatial dimension to economic exclusion with the highest concentrations of households in income poverty (over 42% of households) found in parts of Northumberland Park, Tottenham Hale, Tottenham Green, West Green and Noel Park, and unemployment and the proportion of young people who are NEET (Not in education employment or training) higher in the east of the borough. Therefore, improved access to jobs and services through redevelopment and a positive strategy for development in town centres can be beneficial for these groups in particular.

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

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

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

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

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

Issues, Opportunities and Objectives

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

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

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

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

7. Next steps

7.1 Subsequent steps for the IIA process

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

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

IIA then the IIA may need to be updated. A final IIA Report will accompany the publication of the New Local Plan.

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

7.2 Consultation on the scoping report

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

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

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

7.3 Assessing the New Local Plan

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

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

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

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

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

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

Significance of effect		Description of effect
++	Significant positive	Likely to benefit a large area of Haringey and wider area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major.
+	Minor positive	The extent of predicted beneficial effects is likely to be limited to small areas within Haringey or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor.
O	Neutral	Neutral effects are predicted where the option being assessed is unlikely to alter the present or future baseline situation.
-	Minor negative	Minor negative effects are likely to be limited to small areas within Haringey, or limited to small groups of people and receptors and or those with low sensitivity to change. The effects can be direct or indirect, temporary or reversible. The importance of the receptor that is affected is likely to be minor, as is the magnitude of the predicted effect
--	Significant negative	Likely to affect the whole, or large areas of Haringey and the wider area. Also applies to effects on nationally or internationally important assets. The effects are likely to be direct, irreversible and permanent and or those with high sensitivity to change. The magnitude of the predicted effects will also be major.

?	Unknown	This significance criterion is applied to effects where there is insufficient information to make a robust assessment. It is also applied to the assessment of options that can have both positive and negative effects and it is not clear whether the positive or negative effects outweigh each other.
N/A	Not applicable	This is applied to objectives that are clearly not affected by the option or policy being assessed.

Appendix A- The IIA Framework

Topic	IIA Objective	Equalities Considerations
People		
Demographics	N/A	Address the diverse needs of Haringey's current and future population Ensure equal access to environmental, social and physical infrastructure

Social Integration and Inclusion	Provision of social infrastructure in appropriate, accessible locations Support strategic improvements to areas with highest deprivation Reduce crime and improve perceptions of safety	Promote social interaction in a way that fosters a culture of equality, fairness and respect Improve safety and address fear of crime to help remove barriers to activities leading to reduced social isolation, particularly in areas of higher deprivation
Health	Contribute to the physical and mental health and wellbeing of residents Address the social determinants of health including housing, environment, and economic Improve quality of, and access to, health facilities Support the provision of quality, affordable and healthy food	Promote improvements in physical and mental health, particularly in areas of health and social deprivation Reduce differentials in life expectancy and healthy life expectancy across the borough Improve access to health and social care services and facilities, particularly in areas of deficiency such as the centre and east of the borough
Education	Improve quality of, and access to, education and training facilities	Improve inclusivity and accessibility of education and training facilities, particularly in areas where the need is greatest
Place		
Air Quality	Reduce emissions and concentrations of harmful atmospheric pollutants Deliver development that does not expose current and future residents to poor air quality	Reduce inequal access to clean air

Climate Change Mitigation	Support reductions in greenhouse emissions to meet national, regional and local net zero carbon targets. Support renewable and low carbon energy generation	Contributes to the provision of smart and affordable energy systems Reduce impacts of fuel poverty, particularly for vulnerable groups
Climate Change Adaptation	Adapt to current and future flood risk. Minimise the potential for overheating	Ameliorate the impact of flooding and overheating, particularly those most vulnerable to its effects
Water Resources and Water Quality	Minimise pressure on water resources, water consumption and wastewater flows Maintain and enhance water quality consistent with the aims of the Water Framework Directive and Thames River Basin Management Plan.	Improve access to our waterways
Biodiversity and Open Spaces	Achieve biodiversity net gain Secure an increase in open space and play space across the borough Reduce deficiencies in open space and play space Protect open space and biodiversity	Improve access to open space and areas of biodiversity interest Reduce deficiencies in open space and play space
Land and Soils	Promote the efficient and sustainable use of land and natural resources	Enable remediation of land to ensure the safety and protection of the most vulnerable

Townscape and Landscape	Protect and enhance the character, quality and diversity of the borough's landscapes and townscapes	Help build a sense to place to promote social integration
Design	Support excellent design that is accessible and inclusive	Help build a sense to place to promote social integration Improve legibility and ease of use of the built environment for disabled people
Heritage & Culture	Protect, conserve and enhance designated and non-designated heritage assets, and contribute to the maintenance and enhancement of historic character	Improves equality of access and engagement with our heritage assets and cultural activities
Transport	Enhance and improve connectivity and accessibility for all to, from, within and around Haringey Increase the proportion of journeys made by sustainable and active transport modes. Improve the safety of the transport network	Improve equality of access by walking cycling and public transport Improves the safety of the transport network, particularly for those disproportionately affected by road danger
Noise	Minimise noise and vibration exposure and disruption	Reduce inequalities in exposure to noise, vibration and disruption
Waste Management	Support move towards a circular economy	Minimise negative impacts of waste management, processing and disposal on vulnerable groups
Housing		

Housing	An increased supply of new homes An increased supply of affordable homes, particularly low-cost rented homes Delivery of a suitable housing mix to meets local need High-quality, inclusive adequately sized homes A full range of housing types to meet local need, including specialist needs Homes in good locations with access to services, facilities and amenities	Contribute to increased supply of genuinely affordable homes Deliver homes to meet the full range of needs of Haringey's current and future population, including specific group needs such as older people, gypsies and travellers and those in need of supported housing Ensure that new homes are of a high quality and a suitable size and support health and well being Ensure that new homes are inclusive and accessible Ensure that new homes are served by appropriate infrastructure and located well in relation to key amenities such as public open space and other services and facilities
Economy		
Economy and Employment	Support a strong, diverse and resilient economy Ensure an adequate supply of employment land suitable for existing and new businesses Support for social enterprises, small businesses and the voluntary and community sectors Enable the delivery of affordable business premises	Provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration Improve equality of access to jobs and training opportunities Enable disadvantaged people to obtain employment or upgrade their skills and workplace experience

Town Centres	Enhance the vitality and vibrancy of the borough's town and local centres Enhance the environment of the borough's town and local centres Support new retail and leisure development within existing centres	Create inclusive, safe and accessible spaces for everyone in the community Create healthy environments by promoting active travel and avoiding the proliferation and clustering of uses which are a risk to public health

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

General - International
UN Framework Convention on Climate Change (1992) and Kyoto Protocol (1997) and Paris Agreement (2015)
UN Convention on the Rights of the Child 1990
Johannesburg Declaration on Sustainable Development (Earth Summit 2002)
United Nations Sustainable Development Goals (adopted by the General Assembly in 2017)
The SEA Directive (Directive 2001/42/EC)
General - National
Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004

National Planning Policy Framework 2019
Planning policy for traveller sites 2015
National Planning Practice Guidance (various)
Localism Act 2011
Sustainable Communities Act (as amended 2010)
Human Rights Act 1988
General - Regional
London Plan 2016
Intend to Publish London Plan 2019
General - Local
Borough Plan 2019-2023
Haringey Fairness Commission Report (2020)
General – Local Planning Policy
Local Plan: Strategic Policies DPD (2017)
Development Management DPD (2017)
Site Allocations DPD (2017)
Tottenham AAP (2017)
Highgate Neighbourhood Plan (2017)
Planning Obligations SPD (2018)
Wood Green Area Action Plan Preferred Option (2018)
People
Demographics
Equality Act 2010
Growth and Infrastructure Act 2013
London Infrastructure Plan 2050 (2014)
Mayor's Social Infrastructure SPG (May 2015)
Upper Lee Valley Opportunity Area Planning Framework (OAPF) (2013)
Social Integration and Inclusion
Crime and Disorder Act, 1998
Police and Justice Act, 2006
Equality Act 2010
Mayor's Social Integration Strategy (March 2018: GLA)
Mayor's Equality, Diversity and Inclusion Strategy (May 2018: GLA)
Accessible London: Achieving an Inclusive Environment SPG (October 2014)

Planning for Equality and Diversity in London SPG (October 2007)
Mayor's Police and Crime Plan 2017-2021
Haringey Accessibility Strategy 2017-2020
Haringey Community Strategy 2015
Welcome Strategy – Haringey: A Welcoming Borough for All
Haringey Fairness Commission Report (2020)
Haringey Young People at Risk Strategy 2019-2023
Haringey Violence against Women and Girls Strategy 2016-2026
Haringey Community Safety Action Plan 2019-2023
Health
Tackling obesity: government strategy
London Health Inequalities Strategy (2018)
London Food Strategy (2018)
Mayor's Play and Informal Recreation SPG (September 2012)
Joint Commissioning Strategy for SEND
Haringey's Health and Wellbeing Strategy 2015-18
Physical Activity and Sports Strategy 2019-2023
Haringey Health and Wellbeing Strategy 2020-2024
Education
Skills for Londoners Strategy 2018
Haringey Accessibility Strategy 2017-2020
Haringey Young People at Risk Strategy 2019-2023
Place
Air Quality
Air Quality Standards Regulations 2010
Directive on Ambient Air Quality and Cleaner Air for Europe (2008/50/EC)
Air Quality (England) Regulations 2010
Clean Air Strategy 2019
Environment Bill
London Environment Strategy 2018
Haringey Draft Air Quality Action Plan 2019-2024
Haringey Sustainable Design and Construction SPD (2013)
Climate Change Mitigation
EU Energy Efficiency Directive 2012/27/EU

EU Energy Performance of Buildings Directive 2002/91/EC
Climate Change Act 2008
Planning and Energy Act 2008
Environment Act 1995
Clean Growth Strategy (2017)
Renewable Energy Directive (2018/2001/EU)
Energy Governance Regulation 2018
Revised Energy Performance of Buildings Directive (2018)
London Environment Strategy 2018
Mayor's 1.5C Compatible Climate Action Plan
Mayor's Fuel Poverty Action Plan (2018)
Mayor's Circular Economy Statement Guidance (SPG) - pre-consultation draft (April 2020)
Mayor's Whole Life-Cycle Carbon Assessments (SPG) - pre-consultation draft (April 2020)
Mayor's 'Be Seen' Energy Monitoring Guidance (SPG)- pre-consultation draft (April 2020)
Mayor's Energy Planning Guidance (SPG) (updated April 2020)
The control of dust and emissions during construction and demolition (SPG) (July 2014)
Haringey Draft Climate Change Action Plan 2020
Sustainable Design and Construction (2013)
Climate Change Adaptation
Climate Change Act 2008
The Flood and Water Management Act (2010)
'How Local Authorities can Reduce Emissions and Manage Climate Change Risk' (The Committee on Climate Change) (2012)
London Environment Strategy (2018)
EU Assessment and management of flood risks Directive 2007/60/EC
Thames River Basin Management Plan (2015)
Mayors Regional Flood Risk Appraisal (2018)
London resilience partnership strategic flood response framework, 2015
Haringey Surface Water Management Plan (2011) (SWMP)
Local SuDS Standards (Dec 2015)
SuDS Design Requirements for LLFA Technical Assessment (May 2016)
Sustainable Drainage Design & Evaluation Guide (March 2018)
Water Resources and Water Quality
EU Water Framework Directive 2008/98/EC

Water Act 2003
Thames River Basin Management Plan (2015)
Thames Water - Water Resource Management Plan 2020-2100
London Environment Strategy (2018)
Park Plan (2000) (Lee Valley Regional Park Authority)
Biodiversity and Open Spaces
EU Conservation of Wild Birds Directive 2009/147/EC
Eu Conservation of Natural Habitats and of Wild Flora and Fauna Directive 92/43/EEC and 97/62/EC
Biodiversity 2020: A strategy for England's wildlife and ecosystem services (2011-indicators updated 2019)
Conservation of Habitats and Species Regulations, 2017
Wildlife and countryside Act, 1981
Natural environment and rural communities Act, 2006
England biodiversity strategy: climate change adaptation principles
The guidance for local authorities on implementing the biodiversity duty, 2007
UK post-2010 biodiversity framework
A Green Future: Our 25 Year Plan to Improve the Environment (2018)
Natural England (2014) Green Infrastructure Guidance
All London Green Grid Supplementary Planning Guidance (2012) (ALGG)
London Environment Strategy (2018)
Thames River Basin Management Plan (2015)
Land and Soil
Safeguarding our Soils' strategy (2009)
Haringey Contaminated Land Strategy
Townscape and Landscape
Countryside and rights of way Act, 2000
25 Year Environment Plan (2018)
Haringey Urban Character Study (2015)
London View Management Framework SPG (March 2012)
Design
Public London Charter (2020)
Streetscape Guidance (2019) (TFL)
Making London Child Friendly (Good Growth by Design) (2020)(GLA)
Mayor's Character and Context SPG (June 2014)
Haringey Urban Character Study (2015)

Tottenham Physical Development Framework (2014)
Heritage and Culture
Planning (Listed Buildings and Conservation Areas) Act 1990
Ancient Monuments and Archaeological Areas Act 1979
UNESCO guidelines on World Heritage Sites
World Cities Culture Report 2015 – measures and cultural assets
Planning (Listed Buildings and Conservation Areas) Act 1990
Ancient Monuments and Archaeological Areas Act 1979
Historic Buildings and Ancient Monuments Act 1953
NPPF Guidance: Historic Environment (2019)
Good Practice Advice Note; The Historic Environment in Local Plans (GPA1) (Historic England) (2015)
GPA2 - Managing Significance in Decision-Taking in the Historic Environment (Historic England)
GPA3 - Setting and Views (Historic England)
The Historic Environment and Site Allocations in Local Plans (Historic England Adivce Note)
Sustainability Appraisal and Strategic Environmental Assessment (Historic England Advice Note)
Mayors Culture Strategy (2018)
Character and Context SPG (2014)
Culture and Night-time Economy SPG (2017)
London View Management SPG (2012)
Haringey Urban Character Study (2015)
Transport
Mayor's Transport Strategy (2018)
Healthy Streets for London (2017)
Walking Action Plan (2018)(TFL)
Cycling Action Plan (2018)(TFL)
Streetscape Guidance (2019) (TFL)
Land for Industry and Transport SPG (September 2012)
Haringey's Transport Strategy (2018)
Haringey Local Implementation Plan 2019-2022
Noise Pollution
Noise Policy Statement for England (NPSE) (March 2010)
EU Noise Directive 2000/14/EC
EU Assessment and Management of Environmental Noise Directive 2002/49/EC

Mayor's ambient noise strategy, 2004
Waste Management
EU waste framework directive 2008/98/EC
Waste (England and Wales) regulations, 2014
National planning policy for waste, 2014
UK waste strategy for England, 2007
Part IIA of the Environmental Protection Act 1990
Mayor's Municipal Waste Strategy, London's Wasted Resource (November 2011)
London Environment Strategy (2018)
Circular Economy Statement Guidance - pre-consultation draft (April 2020)
London Infrastructure Plan 2050 (2014)
Draft North London Waste Plan (2019)
Haringey Sustainable Design and Construction SPD (2013)
Housing
Housing and Planning Act 2016
London Housing Strategy 2018
Mayor's Affordable Housing & Viability SPG (August 2017)
Mayor's Housing SPG (March 2016)
Haringey Homelessness Strategy 2018
Haringey Housing Strategy 2017-2022
Haringey Allocations Policy 2015 revised 2018
Haringey Estate Renewal, Rehousing and Payments Policy 2017
Haringey House Extension in South Tottenham SPD 2013
Economy
Economy and Employment
Mayor's Economic Development Strategy (2018)
Mayor' Skills for Londoners Strategy (2018)
A Tourism Vision for London (2017)
Smarter London Together (2018)
London Infrastructure Plan 2050 (2014)
Land for Industry and Transport SPG (September 2012)
Haringey Regeneration Strategy
Tottenham Strategic Regeneration Framework (2014)

Haringey Economic Development and Growth Strategy 2015
Haringey Economic Development Strategy Consultation Draft 2020
Haringey Good Economy Recovery Plan 2020
Town Centres
Mayor's Town Centres SPG (July 2014)
Tottenham High Road Strategy 2019-2029
Haringey Economic Development and Growth Strategy (2017)
Finsbury Park Town Centre (2014)

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Communications and Engagement Plan

NEW HARINGEY LOCAL PLAN

Haringey LONDON

Communications and Engagement Plan (September 2020) – New Haringey Local Plan

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A) Purpose

Haringey's Local Development Scheme (LDS) sets out the timetable for preparation and review of the Council's planning policy documents. The LDS identifies a need for a full review of the existing adopted Local Plan documents, commencing in 2020.

A New Local Plan is required to:

A. Deliver on the priorities set out in the Borough Plan, which include delivery of a New Local Plan

B. Respond to Haringey's Declaration of a Climate Emergency

C. Take into account changes to national policy, in particular, the introduction of the National Planning Policy Framework 2019

D. Be in general conformity with New London Plan

E. Respond to housing delivery challenges

F. Support recovery and renewal from Covid-19

In preparing a new Local Plan the Council will ensure that it engages effectively with its residents and businesses to achieve Outcome 17 of the Borough Plan.

Communications and Engagement Plan (September 2020) – New Haringey Local Plan

B) Responsible Cabinet Member and Officers

Responsible Cabinet Member	Councillor Matthew White	Cabinet Member for Planning and Corporate Services
Responsible Manager	Rob Krzyszowski	Interim Assistant Director for Planning, Building Standards and Sustainability
Responsible Team Lead	Bryce Tudball	Planning Policy Team Manager
Responsible Officer	Timothy Solomon	Principal Planner

C) Policy Context

Legislation

The process for preparing a Local Plan is set out in the **Town and Country Planning (Local Planning) (England) Regulations 2012**. At least two rounds of consultation are required prior to submission of a Local Plan for examination.

Regulation 18 requires the local planning authority to notify the following groups and invite them to make representations on what the local plan should contain:

- Specific consultation bodies as the local planning authority consider may have an interest in the subject of the new Local Plan;
- General consultation bodies as the local planning authority consider appropriate; and
- Residents or other persons carrying on business in the local planning authority's area from which the local planning authority consider it appropriate to invite representations

The Council will undertake two consultations under Regulation 18, with the first stage being the 'First Steps' engagement. This will provide the community with an early opportunity to help shape the direction of the New Local Plan.

In addition, under **Regulation 19,** before submitting a local plan for examination the local planning authority must make a copy of the proposed submission documents (including the draft plan) available for the public to make representations on.

During the local plan examination, major modifications arising out of the examination process may also need to be consulted on.

Section 33A of the Planning and Compulsory Purchase Act 2004 makes clear that the Council is under a 'Duty to Co-operate' with its neighbouring boroughs, the GLA and other prescribed bodies or persons in preparing its New Local Plan, as far as it relates to a strategic matter. The prescribed bodies are set out in **Part 2 of the Town and Country Planning (Local Planning) (England) Regulations 2012.**

Communications and Engagement Plan (September 2020) – New Haringey Local Plan

To support the preparation of the Local Plan the Council is required to prepare an Integrated Impact Assessment (IIA).

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

- A **Sustainability Appraisal** – A systemic process required under the Planning and Compulsory Purchase Act 2004 and by EU Directive that is carried out during the preparation of the Local Plan. Its purpose it is to promote sustainable development by assessing the extent to which the emerging plan will help to achieve relevant environmental, economic and social objectives when judged against reasonable alternatives.
- An **Equalities Impact Assessment** – Aims to ensure that through preparation of the Local Plan the Council is complying with its duty as set out in the Equality Act 2010 to eliminate unlawful discrimination in carrying out its functions, promote equality of opportunity between different genders, racial groups and other equality groups and foster good relations between people who shared a protected characteristic and those who do not share it. Although low income groups are not identified within the 'Protected Characteristics', they will be considered as part of this assessment as low income and deprivation typically overlap with other equalities characteristics.
- A **Health Impact Assessment** – Helps ensure the plan promotes health gains for the local population, reduces inequality and avoids activity damaging health. Not a statutory requirement but is good practice.

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

The Council is expected to consult the consultation bodies identified in the **Environmental Assessment of Plans and Programmes Regulation 2004** when defining the scope of the sustainability appraisal. It is will also need to seek representations from consultation bodies and the public on the sustainability appraisal report (incorporated in the IIA report) prior to submitting these documents for examination alongside the draft Local Plan.

National Policy

The **National Planning Policy Framework 2019** states that plans should be:

- Shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees; and

- Be accessible through the use of digital tools to assist public involvement and policy presentation.

Further guidance is provided in **National Planning Practice Guidance** on Plan-Making.

Haringey Policy

Communications and Engagement Plan (September 2020) – New Haringey Local Plan

The Council's **Consultation Charter** emphasises the fundamental importance of consultation sets out how the Council seeks to consult with people in Haringey. It includes a number of practical goals including:

- Whenever possible, co-ordinating our consultation programme with other organisations that consult people living and working in Haringey.
- Monitoring our consultations to avoid duplication and repetition.
- Clearly communicating the purpose of the consultation, who is being consulting, how people are being consulted, when decisions will be taken and what happens next.
- Using Plain English and translating documents into other languages and formats (e.g. Braille) and providing interpreters at meetings when they are needed.
- Including enough information about consultation to enable people to make an informed contribution.
- Following good practice and legal requirements that relate to equality and social inclusion.

The Council's **Statement of Community Involvement** **(SCI)** sets out how the planning service will engage with the community by ensuring that consultation is: *Effective, Transparent, Proportional, Inclusive, Accountable and Coherent.* The SCI is being reviewed in 2020 to adapt it to social distancing requirements for Covid-19.

D) Consultation Phases

In addition to the statutory consultation requirements under Regulation 18 and 19, the Council will undertake an initial 'First Steps' phase of consultation to ensure early engagement and to meet statutory requirements of Sustainability Appraisal. The phases of consultation, their purpose and timeframe are outlined below.

Phase	Purpose	Timeframe	Length
First Steps (Pre Regulation 18)	*The first opportunity for residents, businesses and other local stakeholders to help shape the new Local Plan from the beginning, identifying key issues the Borough faces and preferences for various possible options.*	Autumn 2020	Minimum 8 Weeks
Draft Local Plan (Regulation 18)	*The Council will consult on a full draft of the Local Plan to consider refined options before the final version is published.*	2021	Minimum 6 weeks
Proposed Submission Local Plan (Regulation	*The Council will publish the Local Plan which is followed by a minimum 6 week period of*	2021	Minimum 6 weeks

19)	*consultation where formal representations can be made to it.*		
Submission and Examination (Regulations 22-25)	*The Council will submit the Local Plan to the Secretary of State via the Planning Inspectorate. A Planning Inspector will examine the document to check for compliance with the legislation and tests of soundness. The Council may need to consult on the Proposed Modifications.*	2021/22	TBD
Adoption (Regulation 26)	*The Council will adopt the Local Plan following consideration of the Inspector's recommendations.*	2022	TBD

E) Characteristics of the Borough

The State of the Borough Profile provides Haringey's stakeholders with access to data to understand the unique characteristics of the borough. The most recent profile was published in July 2020. Key findings include the following:

- Haringey has a **young population.**
  - Children between 0-17 years comprise 21% of the population.
  - Young adults (18-34) make up the largest proportion of residents (27%).[1]
  - The older age groups (65+) are expected to experience the largest percentage group by 2028, however, will still only comprise 12% of the total population by then.
- Haringey has an ethnically **diverse population.**
  - 38% of residents belong to Black, Asian and minority ethnic groups. 26% identify as ethnically white other than British.
- **Numerous languages** are spoken in Haringey.
  - 180+ languages are spoken in the borough.
  - 30% of residents do not speak English as their main language. Of those, 24% do not speak it well or at all.
- Haringey has the **9th largest proportion of LGBT residents** (4%) of all local authorities. 25% of all homeless youth are LGBT.
- **10% of the population between 16 and 64 have a physical disability.**
  - Almost 5,000 people have sight loss which impacts on daily living and 15,700 have a moderate or severe hearing impairment.
- The proportion of residents that are renting from the local authority or housing association (20%) or privately renting (34%) has increased since 2011 while home ownership has dropped.
- **Deprivations levels are high**, particularly in the northeast of the borough.

[1] GLA SHLAA (2016) Population Estimates for 2018

- 3,000 households (25 per 1,000) are living in temporary accommodation. This is the third highest rate in London.

- Haringey has a **diverse household composition.**
  - 16% are workless households, 49% working households and 36% mixed households.
  - 32% are one person households, 16% couples with dependent kids and 11% are households with a lone parent and dependent children.
- **Job density in the borough is low.**
  - The borough's population decreases by about 16% during the workday, indicating that residents leave the borough for work.
  - There are 2,700 creative and cultural industry (CCI) enterprises in Haringey, which are estimated to employ over 5,220 people.
- **Haringey has good facilities, with a range of cultural events, sporting venues and transport links**
  - There are over 120 venues where cultural activity takes places and over 70 events occurring annually from community theatre to large scale music events.
  - There are clear clusters around Alexandra and Finsbury Parks, Noel Park, Crouch End and Tottenham Green, but cultural venues are well spread across the borough.
  - Haringey is also home to the Tottenham Hotspur Stadium, a world-class multi-use stadium capable of staging major sporting and non-sporting events.

F) Previous Consultations

It is important to review previous consultations to avoid duplication, repetition and ensure we are making full use of the information our stakeholders provide us with.

In early 2018, Haringey Council commissioned market research company BMG Research to conduct a survey of Haringey residents to understand more about their lives, attitudes, and feelings about their local areas. BMG Research conducted 1,900 face-to-face interviews with a representative sample of residents from across the borough. Key findings from this survey include the following:

- Work or commuting advantages were the most commonly mentioned single reason for moving to Haringey (30%). A total of 45% of recent arrivals gave housing related responses (i.e. housing was affordable, the type of housing met my needs or was offered housing here).
- Work and housing (availability and affordability) as well as being key reasons for in-bound population movements also are key reasons for individuals being likely to move away from the borough.
- Those who have lived in Haringey for longer are more likely to state that they will still be living in here in 5 years' time.
- Couples with children are 2.5 times more likely to state that they will be living in the area in the next 5 years compared with single people with no children.
- When asked in an open response question what makes the biggest difference to quality of life on a day to day basis, safety and security issues were most commonly mentioned (13%), followed by cleanliness, health/wellbeing, access to open spaces and family and friends. Transport/ traffic was 7%, area/location/place (6%), noise levels (6%), housing (3%) and parking (2%).

Other documents that have been recently consulted on include:

- The Air Quality Action Plan 2019-2024
- Parking Consultations 2019
- Affordable Energy Strategy 2020-2025
- Budget Consultation 2020-21
- Affordable Energy 2020-2025

In addition, the Wood Green Area Action Plan Regulation 18 Preferred Option Consultation was undertaken in 2018. The resulting consultation report provides an indication of which demographics require specific targeting, although it should be noted that this consultation was area focused rather than borough-wide.

- **Children and Young People** were **significantly underrepresented.** 0-15-year olds provided 1% of responses when 0-17-year olds are 22% of the total borough population.
- **Young Adults (25-34-year olds)** were **underrepresented,** providing 17% of responses and comprising 29% of the population.
- **BAME** groups were underrepresented. They provided 21% of the responses compared with 38% of the population
- **'White-Other'** groups appear to have been underrepresented. They comprise 26% of the population.

G) Objective and Strategies

The **overall objective** is to achieve effective, representative engagement with the public and key stakeholders to:

A) Inform development of the Local Plan
B) Provide the public with opportunities to influence the decisions that will affect them
C) Ensure the Council complies with its statutory requirements as well as its own aspirations for consultation

To achieve this objective, we will employ the following strategies:

	Strategy	Method
1	Clear, concise, accessible, and engaging messaging	A. Consistent branding. B. Use of plain English, short easy to read documents in an accessible format. C. Clear focal point of information provision – website. D. Use infographics and videos to engage audience. E. Clearly state the purpose of consultation, who it is for, when decisions will be taken and what happens next.
2	Long term focus on building relationships with key stakeholders	A. Clear tracking of responses through the different stages of consultation. B. Timely responses to consultation feedback. C. Establish clear points of communication and work with wider Council to ensure established relationships with key stakeholders are used where appropriate. D. Acknowledge what our communities have

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		already said through previous consultations.
3	Achieve a representative response	A. Use of the representative Citizens Panel Develop new approaches to target groups that we may not be reaching through traditional consultation methods: B. Young people C. LGBTQ+ D. Disabled people E. BAME F. People with language barriers G. Gypsies and Travellers H. Groups who may have limited internet access or familiarity I. Areas of higher deprivation and anticipated growth Work with other Council departments to ensure the views of local businesses are obtained. J. Small businesses K. Complete Equalities Impact Assessment L. Ensure people know how all information is managed, used and stored in accordance with the Data Protection Act 2018. M. Compile demographic information from responses.
4	Work collaboratively across the Council and across the community	A. Ensure consultations are co-ordinated with others across the Council. B. Work with relevant Council teams to develop consultation material and ensure clear and consistent messaging across the Council. C. Make use of existing Council facilities and community events where appropriate. D. Engage collaboratively with community groups and organisations to distribute messaging to their members and contacts.
5.	Achieve efficient consultation	A. Set out what can and cannot be achieved through the Local Plan. B. Provide enough information about the consultation and subject areas to ensure people can make an informed decision. C. Use consultation as an opportunity to promote existing guidance material where appropriate. D. Collect information on the perceived quality of the engagement exercise.
6.	Use digital tools to assist public involvement and policy presentation	A. Focus consultation on an accessible and engaging main webpage. B. Investigate opportunities to use digital tools improve accessibility, attractiveness, and ease of consultation. C. Make use of social media platforms.

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H) Phase 1 Consultation: First Steps

Phase 1 Consultation: 'First Steps' is the first opportunity for residents, businesses and other local stakeholders to help shape the new Local Plan from the beginning, identifying key issues the Borough faces and preferences for various possible options.

The **Key Messages** for this Phase are:

- Help shape the future growth of your borough
- We know that the Covid-19 pandemic has had a big impact on people in the borough and it is a difficult time, the New Local Plan will support the borough's recovery, and we want to help and support people to be engaged in the New Local Plan
- The Local Plan will set out London Borough of Haringey's policies towards housing, climate change, town centres, open space, employment, community facilities, the built and natural environment and transport – all of which contribute to making Haringey a vibrant place to live, work and play.
- Have your say on **TBD**
- The consultation ends on **TBD**

The quantitative **target** for this Phase is 1000 representations

Event/channel *(Optional)*	**Description**
Local Plan Website	A dedicated Local Plan webpage is set up on the Council website or externally and linked to the Council webpage to provide a clear, engaging and flexible platform to be a focal point for engagement
Branding	Develop distinctive Local Plan branding within the Haringey branding requirements
Council Website	Full information on the dedicated page of the website. Plus use of homepage web banner 'carousel'.
Videos	Short video on the Local Plan Website encouraging everyone to get involved. To be shared on social media platforms, internal Haringey website.
Infographics	To include on the document, webpage, questionnaire, social media and any physical consultation materials
Online consultation questionnaire	Posted on Council consultation portal and optimised for mobile devices. Word version also available for those who can't use the online questionnaire
Online consultation questionnaire – Kids Edition	A simplified, more visual interactive questionnaire for kids. This could be used by schools as part of their online education.

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Event/channel *(Optional)*	Description
Live Chat/ Webinar	The Council could run webinar 'live chat' sessions (less than 45 min) through the Local Plan Website.
Agents Forum	The Planning Service occasionally holds an Agents' Forum with the planning consultants / developers / architects that regularly submit planning applications to discuss service improvements and planning policy
Quality Review Panel (QRP)	QRP is a panel of design experts that review planning applications. The QRP could review the Plan as a whole or review certain elements such as the Design policies, and/or Regeneration Area chapters. May not be appropriate for First Steps but for Regulation 18 Draft Plan stage
Voluntary and Community Sector (VCS) Networks e.g. Bridge Renewal Trust, Selby Trust, etc. Equally consider the Climate Forum, Neighbourhood Forums, CAACs etc.	Use networks to promote / run events with.
Virtual Exhibition	Corporately the Council is considering options for 'virtual exhibitions'.
Social media	Create simple 3-5 image infographics to communicate the Local Plan process and key topics in a quick and engaging way. These are to be used on all social media platforms Use of Council Facebook Instagram and Twitter to disseminate encouragements and reminders to participate in consultation survey and events using #HaveYourSayHaringey (TBC) or an alternative hashtag. Promoting posting on other non-Council community social media pages
	Use social media – quick polls for key local plan questions to encourage people who are time-poor to provide feedback. There should also be the opportunity to link to the Local Plan Webpage and full questionnaire
	Encourage discussion and debate on social media platforms – consider include short videos from community groups to encourage involvement
Digital Advertising	Advertise the engagement online to people that interact with our council webpages and other affiliated or local pages
Clear Channel	Advertise on digital panels in the borough
Citizens Panel	Send out online Questionnaire/ Link to Local Plan Website to entire Citizens Panel.
Media Relations	Press release News stories linked to all milestones including general reminders to participate in the consultation.

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Event/channel *(Optional)*	Description
	Reactive PR support for media enquiries throughout consultation. Haringey People and Haringey People Extra– Homes Zone (HfH) Tottenham Website and Tottenham Community Press
Email campaign	Website/ questionnaire link sent directly by email to Local Plan Consultation Database as supplemented by research on relevant public groups/ organisations
Planning Communications	Include a brief note on the consultation and a link to the email signatures of planning service.
Internal	Regular internal news updates and progress reporting
Posters/ boards to be created	Visual posters or display boards created – posing short thought-provoking questions and containing information on how to engage These could be placed at the following locations: - Supermarkets - Entrance to parks - Libraries and other public facilities - Connected Communities Hubs - Lampposts (next to the above locations and at town centres)
Children and Young People	Provide information on Haringey Youth Space, through Haringey Gold
	Online consultation questionnaire – Kids Edition: A simplified, more visual interactive questionnaire for kids. May include a quiz at the end to cement learning. This could be used by schools as part of their online education.
	Marketing via school bulletins
	Empowering Youth Advisory Board to engage their peers – work with them to approve/ create consultation content
LGBTQ+ (in particular young people)	Discuss other options with Council's LGBT+ Network and local, regional and national groups like Wise Thoughts, Embrace UK and LGBT+ Youth Group, PlanningOut and Stonewall.
Disabled People	Work with Web Team to ensure that the website at a minimum meets level AA of the Web Content Accessibility Guidelines (WCAG 2.1) Talk to Wood Green Regeneration Team who worked with local disability groups as part of the Design Guide. Look at opportunities to provide audio content/ transcripts alongside PowerPoint style information presentations. Engage directly with community groups representing those with disabilities to co-develop/ test materials.
People with language	Look at options for translating website material

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Event/channel *(Optional)*	Description
barriers	
	Focus on making the Plan as visual and easy to read as possible
BAME	Engage with BAME community groups, organisations and the LBH BAME network. Look at opportunities to advertise in non-english media
Religious Groups	Work with religious leaders to provide consultation materials to their congregations. Engage with Council faith groups.
Gypsies and Travellers	Work with local community liaison and London Policy Officer to identify engagement approach
Groups who may have limited internet access/ familiarity	Work with Older Persons and Housing Services as well as older persons representative groups to identify best mechanism to communicate
	Put up display boards at libraries and Connected Communities hubs. Provide options to print out summary document and questionnaire as well as provide feedback at these locations
	Consider options of a borough wide mail out advertising the consultations
	Consider opportunity to undertake Vox Pop style interview, particularly in areas of higher anticipated growth such as Tottenham and Wood Green. This could be led by local councillors
Areas of higher deprivation and anticipated growth	Include a leaflet with information on how to engage (online and offline options) to those receiving food through connected communities Focus poster distribution in areas of anticipated growth and deprivation. Distribute posters on Council estate information boards.
Businesses	Work with the EDS team to develop an approach to engaging with businesses, including the Wood Green BID. Promote through the Business Bulletin.

I) Scoring/Evaluation

Have we implemented the strategies?

	Strategy	Method	Achieved (Y/N)
1	Clear, concise, accessible and engaging messaging	A. Consistent branding	
		B. Use of plain English, short easy to read and accessible documents	
		C. Clear focal point of information provision - website	
		D. Use infographics and videos to engage audience	
		E. Clearly state the purpose of consultation, who it is for, when decisions will be taken and what happens next	
2	Long term focus on building relationships with key stakeholders	A. Clear tracking of responses through the different stages of consultation	
		B. Timely responses to consultation feedback	
		C. Establish clear points of communication and work with wider Council to ensure established relationships with key stakeholders are used where appropriate.	
		D. Acknowledge what our communities have already said through previous consultations.	
3	Achieve a representative response	N. Use of the representative Citizens Panel Develop approaches to target groups that may not respond to traditional consultation methods:	
		A. Young people	
		B. LGBTQ+	
		C. Disabled people	
		D. BAME	
		E. People with language barriers	
		F. Gypsies and Travellers	
		G. Groups who may have limited internet access/ familiarity	

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		H. Areas of higher deprivation and anticipated growth	
		Work with other Council departments to ensure the views of local businesses are obtained. I. Small businesses	
		J. Complete Equalities Impact Assessment	
		K. Ensure people know how all information is managed, used and stored in accordance with the Data Protection Act 1998.	
		L. Compile demographic information from responses	
4	Work collaboratively across the Council and across the community	A. Ensure consultations are co-ordinated with others across the Council	
		B. Work with relevant Council teams to develop consultation material and ensure clear and consistent messaging across the Council	
		C. Make use of existing Council facilities and community events where appropriate	
		D. Engage collaboratively with community groups and organisations to distribute messaging to their members and contacts.	
5.	Achieve efficient consultation	A. Set out what can and cannot be achieved through the Local Plan	
		B. Provide enough information about the consultation and subject areas to ensure people can make an informed decision	
		C. Use consultation as an opportunity to promote existing guidance material where appropriate	
		D. Collect information on the perceived quality of the engagement exercise	
6.	Use digital tools to assist public involvement and policy presentation	A. Focus consultation on accessible and engaging main webpage.	
		B. Investigate opportunities to use digital tools improve accessibility, attractiveness and ease of consultation.	
		C. Make use of social media platforms.	

Measurable Targets for Phase 1

- 1000 unique representations
- 80% satisfaction with the quality of engagement
- 3000 unique visitors to the Local Plan Webpage
- Reach and engagement of social media posts
- Amount of media coverage throughout consultations

J) Equalities Impacts

The New Local Plan has the potential to result in negative impacts on individuals and groups with protected characteristics as well advance equality through its policies. The Integrated Impact Assessment Scoping Report sets out the equalities issues related to each New Local Plan topic area and identifies key considerations for policy development to ensure potential negative impacts are mitigated and opportunities identified and advanced in policy. No policies or proposals have been put forward in the First Steps engagement to be assessed at this stage.

However, consultation on the First Steps engagement document provides and opportunity for individuals and groups with protected characteristics to be involved in the development of the New Local Plan and help ensure that equalities issues and opportunities are adequately considered and addressed in the Plan.

Age	The First Steps engagement will seek the feedback of individuals and groups of all ages, taking steps to actively engage young people who are often not engaged in this process
Disability	The First Steps engagement will actively seek the feedback of representative groups and will ensure that key engagement material is able to be accessed in an accessible format
Gender reassignment	The First Steps engagement will not discriminate on the grounds of gender reassignment. It will actively seek the feedback of representative LGBTQ+ groups, including those representing transgender people.
Marriage and civil partnership	The First Steps engagement will not discriminate on the grounds of whether a participant is married or in a civil partnership
Pregnancy and maternity	The First Steps engagement will not discriminate on the grounds of pregnancy and maternity
Race	The First Steps engagement will seek the feedback of individuals and groups of all ethnic groups, taking steps to actively engage minority groups that are often poorly represented in similar engagements
Religion or belief	The First Steps engagement will seek the feedback of individuals and groups of all religions and belief and will actively look to promote the engagement through religious organisations
Sex	The First Steps engagement will not discriminate on the basis of sex
Sexual orientation	The First Steps engagement will not discriminate on the grounds of sexual orientation and will actively seek the

	feedback of representative groups

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Report for: Cabinet: 13 October 2020

Title: Children's Social Care Annual Report 2019/20

Report authorised by: Ann Graham, Director of Children and Young People's Service

Lead Officer: Beverley Hendricks, Assistant Director, Children's Social Care.

Ward(s) affected: All

Report for Key/ Non Key Decision: **Key decision**

1. Describe the issue under consideration

1.1 This report provides an overview of safeguarding and looked after children activity and performance for 2019 – 2020.

2. Cabinet Member Introduction

2.1 I welcome Children's Social Care's first Annual Performance Report. The Director of Children's Services and I, in our statutory roles, are committed to producing an annual report each year.

2.2 An annual report gives us the opportunity to see the improvements the service is making, the challenges it faces and where we need to focus our attention for improvement. The report looks at performance for 2019-20 and although for part of the year, Coronavirus was with us, we had not yet gone into lockdown and the closure of schools. We know that the virus has impacted all of Haringey but it is a fact that families, and therefore, children and young people in the east of the borough have been hit particularly hard by the virus and lockdown. For example, the east of the borough has amongst the highest rates of those furloughed in London.

2.3 I note this because this is the context within which our children and young people are now living, and Children's Social Care and Partner agencies are working to support them.

2.4 The performance report notes areas where we are doing well and also where we need to improve. I would like to pick out one area of continued improvement that I am proud of and that is, the continued positive educational outcomes for our children in care and care leavers in higher education. I was delighted to be able to send congratulation cards to some of them noting their excellent achievements this summer.

2.5 I recommend that Cabinet notes this report and the information in it on the services' performance.

3. Recommendations

Cabinet is asked to:

3.1 Note the Children Social Care Annual Report 2019/20 and in particular:

a) the increase in the rate of referral, reduction in the numbers of referrals that result in 'no further action' and the effectiveness of the Multi Agency Safeguarding Hub (MASH) (paragraphs 6.5 to 6.6 and 6.7 to 6.9);
b) improvements in the numbers of, and time taken to complete assessments (paragraphs 6.13 to 6.14);
c) the increase in the rate of Section 47 enquiries (paragraph 6.17);
d) the slight reduction in the numbers of children in care which has closed the gap with our statistical neighbours (paragraph 6.26);
e) the need to reduce the numbers of children placed out of boroughs and the very good performance on long term placement stability (paragraphs 6.28 and 6.30);
f) the significant improvements in the numbers of care leavers in suitable accommodation (paragraph 6.47); and
g) the action taken to improve the recruitment and retention of social workers (section 7).

4. Reasons for decision

4.1 The annual report is intended to inform Cabinet of the performance of Children Social Care in 2019/20. Cabinet should be aware of the progress made against managing the financial and safeguarding demands. The report, in addition to other measures, enables Cabinet to assure itself that the necessary arrangements are in place for the Council to effectively discharge its children social care obligations. In this regard, there is a distinct leadership role for the Leader, Lead Member for Children and Young People's Services, the Chief Executive and Director of Children Services. Also, there is a wider corporate parent role for all members of the Council.

5. Introduction and Background

5.1 This report provides an overview of performance for Children's Social Care Services for the full year of 2019/20. This is the first annual report and a report will be produced each year. This report covers the period before the COVID-19 lockdown and the closure of schools which took place on 23 March 2020. The report provides comparative data by benchmarking with local authorities that are similar to Haringey (our statistical neighbours) and looks at our performance from 2017 to 2020 where this is available. The Children's Social Care Service ensures that:

- children who are referred to the service receive the help and protection they need; and

- children in our care receive the help and support they need to thrive.

5.2 The Children's Social Care Service provides services and support for children and young people who are in need, at risk of harm and in need of protection and also children who are looked after in our care and care leavers. The children and young people have needs which are assessed as being complex or acute and require the statutory involvement of the Local Authority within the responsibilities set out in legislation (Children Act's) and national guidance (Working Together to Safeguard Children 2018).

5.3 The Ofsted report from our Focused Visit of the front door in 2019 noted our approach to sustainable change and recorded that the leadership team is '*establishing strong foundations to ensure that the children supported across all teams consistently benefit from services that make a difference to their lives'*. We recognise that sustainable cultural change takes time before results are seen, and the importance of maintaining pace and tenacity. We are continuing with improvements as evidenced in the following sections.

5.4 Significant events and changes this year included:

- Strengthening partnership working through the Haringey Safeguarding Children Partnership (HSCP) - these new arrangements came into effect on 29 June 2019 and replaced the Local Safeguarding Children's Board (LSCB).
- Continued positive educational outcomes for children in care with 12% of our care leavers in higher education, well above the national rate and that of our statistical neighbours by 2%.
- Launched a new Violence, Vulnerability and Exploitation service with a multi-agency offer to safeguard children and families at risk including those who go missing repeatedly.
- Development of a significant invest to save programme of projects providing £2m investment to improve outcomes for children and families. These projects, such as the Maya Angelou Family Assessment Centre, PAUSE, Mockingbird and our edge of care work through the Positive Families Partnership, are now up and running and delivering results for children and families.
- The service is working with the North Central London Commissioning Group to build resilience and capacity in placement options for children with more complex needs including the development of the Haslemere Road assessment centre designed to bring children back into the borough.
- Launch of the Haringey Children's Academy providing learning and development opportunities for the children's workforce and supported by professors and academics.
- Launch of the Regional Adoption Agency for North London in October 2019;
- A report from Ofsted following the Focused Visit in December 2019 that is positive about the direction of travel regarding service improvements.
- Appointment of the permanent Assistant Director for Safeguarding and Social Care and the appointment of the Principal Social Worker.

5.5 Safeguarding and Social Care is supporting high levels of need and a high level of complexity in families. The reasons for this can be seen in the following:

- Haringey has a higher than average number and rate of children living in all out-of-work benefit claimant households compared to London.
- Haringey has the 16th highest alcohol-related hospital admissions out of all London Local Authorities, and the largest volume of pure alcohol sold per adult through the off-licence trade.
- 2.5% of Haringey's 16-64-year-old population claim Employment Support Allowance for mental health disorders. This is the 4th highest rate of all London boroughs and above the London average, with the rate being substantially higher in the east of the borough than in the west.
- Haringey has the 6th highest rate of domestic abuse with violence out of all London Boroughs and is above the London average;
- Haringey has the third highest rate of households in Temporary Accommodation in London and the population outnumbers the availability of housing by approximately 12,000.

5.6 Alongside these challenges for children, Haringey has many positives for children growing up in the area. It is a place that has a rich history, strong and vibrant communities, great transport links and excellent facilities with a range of cultural events. Key strengths include:

- 97% of schools that are good and outstanding;
- 99% of early years settings are judged as good or outstanding;
- the majority of our children's centres are judged good (5 out of 8) with all having good or outstanding childcare;
- diverse communities where more than 180 languages are spoken;
- over a quarter of the borough is green space – with 25 Green Flag Parks and 120 venues where cultural activity takes place;
- residents report that they have good friendships and associations in their local area and good relations between different ethnic and religious communities; and
- residents report higher levels of satisfaction than other London boroughs.

Our children and young people population

5.7 In Haringey there are 59,847 children aged 0-17 years, representing 22% of the overall population (ONS 2019 Mid Year Estimates). Five to 15-year olds make up the largest proportion of this age group accounting for almost 60% of the 0 -17-year-old population. This is largely in line with the statistical neighbours and London where 21% and 22% of the population are aged 0-17 respectively. Children are not evenly spread across Haringey – eastern parts of the borough contain a large number and proportion of children, whilst many areas in the western parts of the borough have relatively fewer young people. Whilst in terms of overall population the East of the borough has 22.6% children and the West 21.3%, there can be significant variation between wards. Notably the wards with the highest proportion of 0-17-year olds is Seven Sisters (31%), whilst the ward with the lowest is Harringay (17%). The percentage of the population that is under

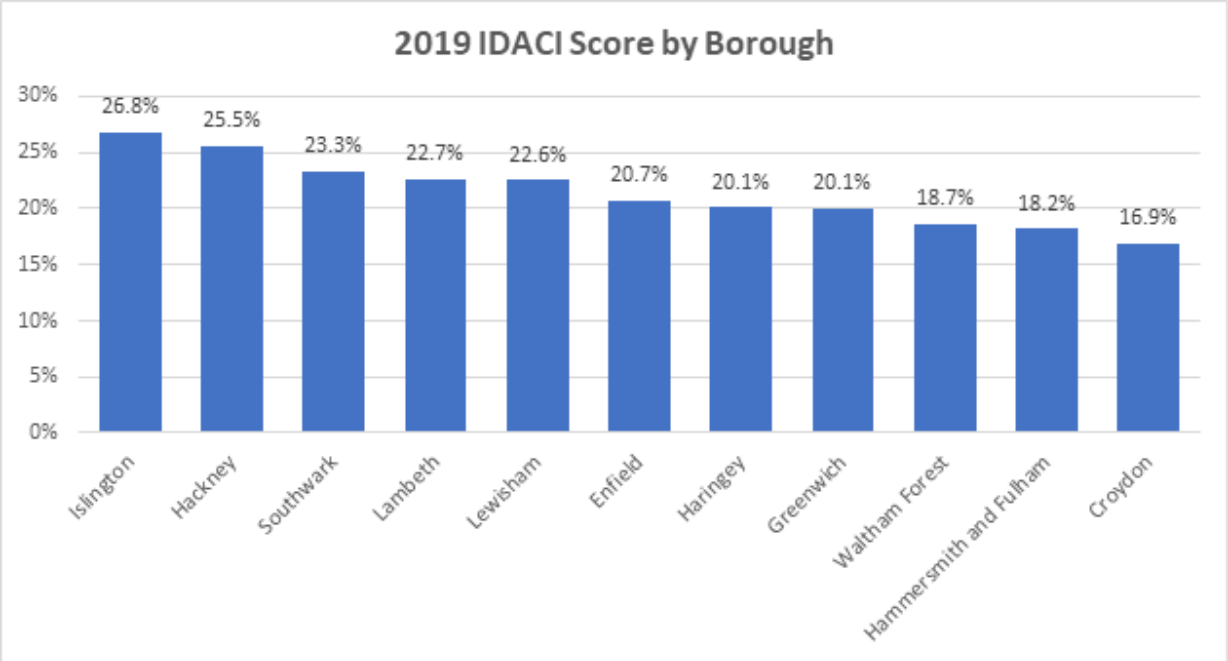
18 is not expected to change significantly and will remain most concentrated in the East of the Borough.

5.8 The majority of pupils in Haringey schools do not have English as a first language (53.5%). After English, Turkish, Polish, Somali, Spanish and Bangladeshi are the most common languages spoken.

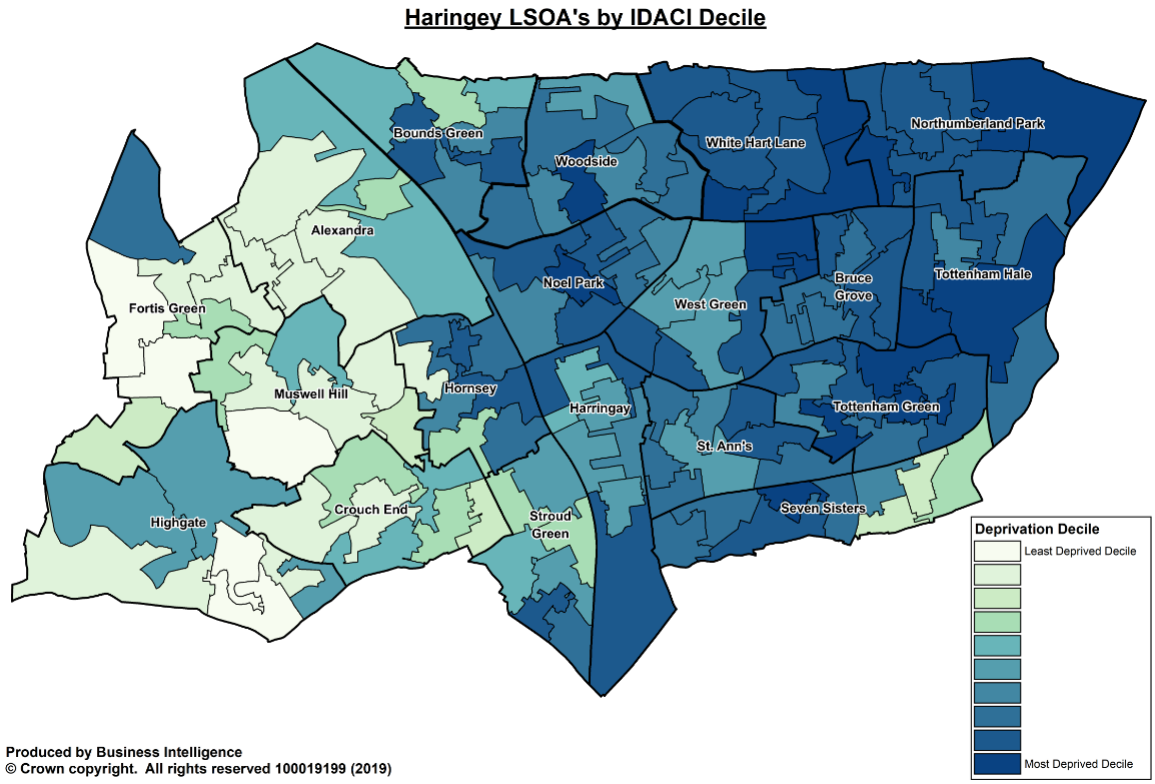
5.9 One of our greatest challenges is inequality in outcomes. Poverty is a key determinant of poor outcomes. Childhood deprivation is unequally distributed across the borough mostly affecting those in the East. In 2016, 1 in 4 Haringey children aged under 16 years were living in poverty (24.4%), a higher rate than in London (21.8%) or England (18.6%). In 2017 this has increased slightly to 26%. Haringey's eastern wards also have a larger number of children living in all out-of-work benefit claimant households compared to the west of the borough. Department for Work and Pensions' data shows the percentage of children in out-of-work benefit claiming households as 22.9% in White Hart Lane, 22.4% in Northumberland Park, whilst at the same time just 3.1% in Muswell Hill and 4.3% in Alexandra.

5.10 Latest provisional DWP data (updated June 2020) on children living in low income families shows an increase of over 20% in families living in relative low income from 10,935 families in 2016/17 to 13,167 in 2018/19. Relative low-income is defined as a family whose equivalised income is below 60 per cent of contemporary median income. Gross income measure is Before Housing Costs (BHC) and includes contributions from earnings, state support and pensions.

5.11 Haringey's 2019 IDACI (Income Deprivation Affecting Children Index) score which measures deprivation of children in the area is the 9th highest in London at 20.1%. London's overall average score is 17.2%. See graph below showing how Haringey compares to statistical neighbours:



5.12 Of Haringey's 145 smaller geographic areas (Lower Super Output Areas – LSOAs), 52 are in the top 20% most deprived in the country for IDACI. These are almost all in the East of the borough – see the map below:



5.13 The table below shows how Haringey ranks in the top 10 in the Indices of Multiple Deprivation (2019) in London:

	National districts rank of ranks (out of 317 districts	London IMD 2019 rank of rank
Barking and Dagenham	5	1
Hackney	7	2
Newham	12	3
Tower Hamlets	27	4
Islington	28	5
Lewisham	35	6
Haringey	37	7
Lambeth	42	8
Southwark	43	9
Waltham Forest	45	10

5.14 It is widely accepted that poverty correlates positively with child abuse and neglect*, meaning that those in the east of the borough are more vulnerable to

these issues. (*see Joseph Rowntree Foundation Report: "The Relationship between Poverty, Child Abuse and Neglect", 2016.)

6. Safeguarding and looked after children trends

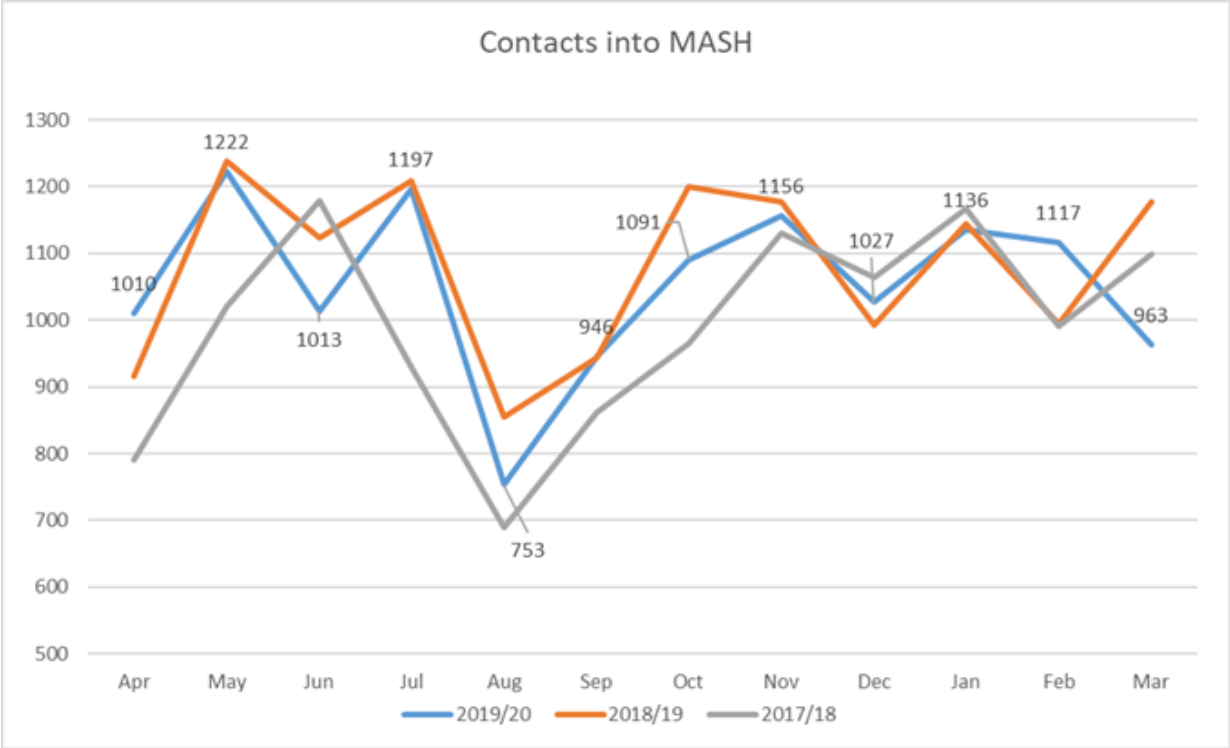
6.1 This section of the report sets out the data we monitor every month to assess our performance in supporting children who are on a child protection plan and those who are in our care. The data supports us in tracking our improvement and identifying our challenges for action and this is shown for the past three years.

Contacts and referrals to children's social care

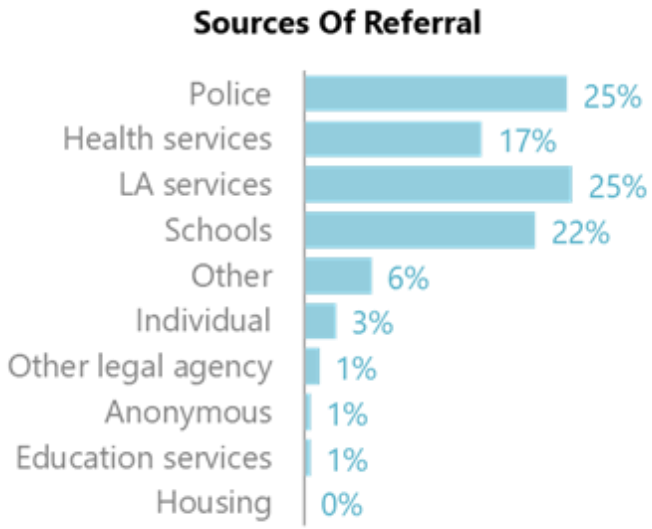
6.2 The communication of concerns from partner agencies or the public to children's social care is an important step in initiating a child protection response. Not all of these communications from partners and the public result in a referral to social care as they do not always meet the threshold for referral to assessment or they are simply one of our partner agencies ringing for some advice or support when they think a child may need early help or support. These are categorised as contacts.

6.3 A referral is a request for services to be provided by children's social care and is in respect of a child who is currently not assessed to be in need. This means that social workers in the multi-agency assessment hub (MASH) share information and complete a risk analysis for the referral.

6.4 In 2019-20, the total number of contacts made to the MASH was 12,631. This is 2.6% fewer contacts this year compared to 2018/19.



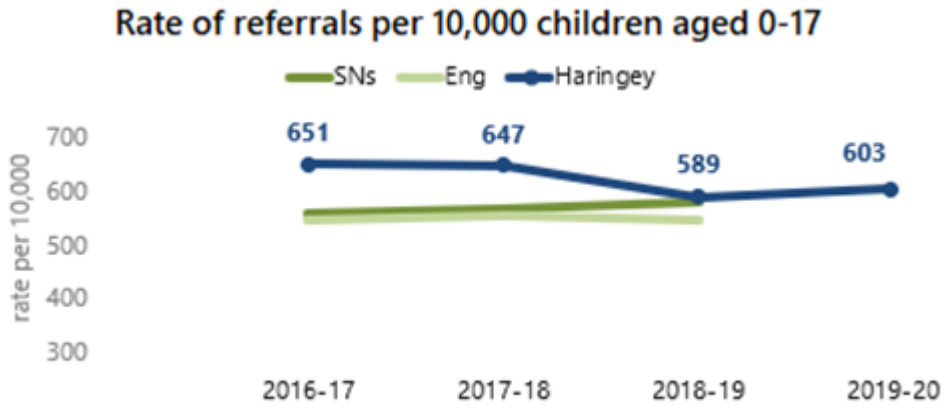
6.5 37% of these contacts result in a referral to social care, a 10-percentage point reduction on the previous year. The largest source of contacts (41%) and referrals (25%) are from the Police.



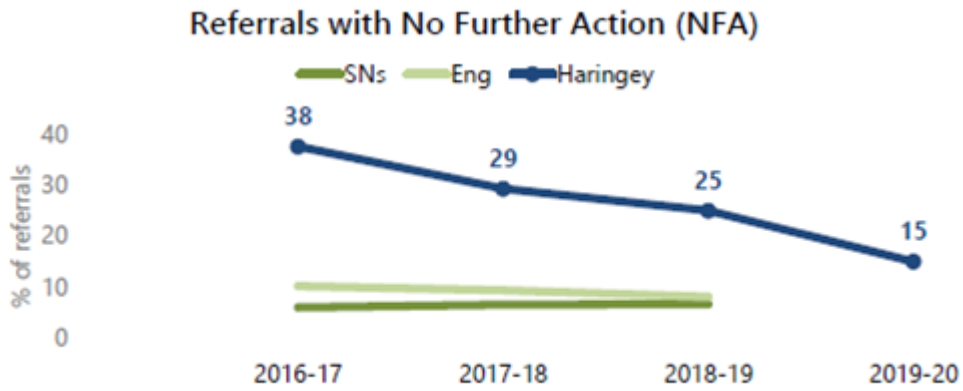
6.6. At the end of March 2020, the rate of referrals was 603 per 10,000 children aged 0-17, this was an increase on the rate at the end of 2018/19 (589 per 10,000) and is slightly above the last published rate (2018-19) for statistical neighbours of 581. The graph below shows the change in the rate of referrals over time.

6.7 There are differing referral rates for the east and west of the borough, for Tottenham, there were 2,278 referrals, this is a rate of 681 per 10,000 and for

Hornsey and Woodgreen, there were 1,189 referrals and this is a rate of 442 per 10,000.

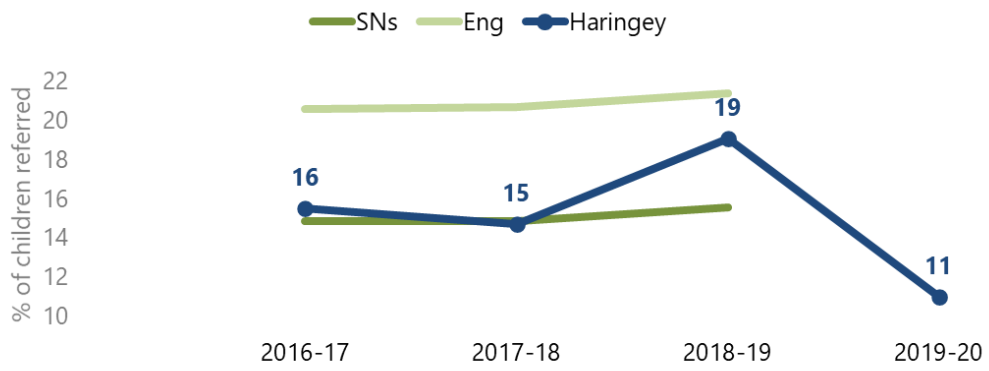


6.8 The rate of referrals to children's social care that result in 'no further action' (NFA) remains higher than statistical neighbours and national rates as shown in the graph below. There has been a significant reduction since the end of 2018/19. In 2019/20, 15% of Haringey referrals resulted in no further action compared to less than 10% for both statistical neighbour and national averages. This improvement in performance is down to our work with partners to improve the quality of referrals and their understanding of thresholds. The reasons referrals count as NFA to social care include being directed to the Early Help Service and uptake of a universal service.



6.9 Performance in relation to re-referrals is good with fewer than 11% of children with more than one referral in the 12 months prior to the reporting date, down from 19% at the end of 2018/19. As shown in the graph below, this is broadly in line with statistical neighbours and below the national average which was 21% at the time of last publication. A lower re referral rate suggests that work to support families is effective and sustained.

Re-referrals: children with a previous referral within 12 months of their latest referral



6.10 The Multi Agency Safeguarding Hub (MASH), which receives contacts and referrals, is our local single point of contact for anyone who is worried about a child. The service continues to be an effective collaboration with key partners and has sustained the practice and performance that Ofsted noted in their last visit: '*A culture of professional curiosity and child centred practice in the multi-agency safeguarding hub (MASH) and assessment service is leading to tangible improvements for children and young people'*.

6.11 Additionally Ofsted noted that an early help hub embedded in the MASH is a '*significant strength'* as the co-location of a social work-qualified early help team manager and dedicated family support worker means that children 'benefit from the immediate help given, and this is preventing concerns from escalating'. It '*is an important improvement, as some children requiring early help had previously waited too long'* (Focused Visit, Ofsted 2019).

6.12 Our performance data continues to show us that the MASH is a safe service providing an appropriate and timely response to contacts and referrals to safeguard children. Cases are prioritised, tracked and monitored through the MASH process with clear pathways and timescales for consistency. We check our decision making in the MASH through routine management oversight and the requirements for the transfer of cases.

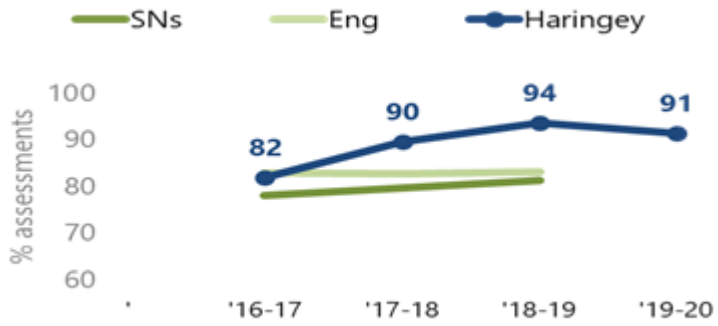
Assessments

6.13 A referral will then either result in a decision to complete an assessment of the child's needs (within 45 working days) or, if there is a concern that immediate protection may be needed as the child is suffering or likely to suffer significant harm, an immediate strategy discussion is held. At the strategy discussion it is decided whether to initiate enquires under section 47 of the Children Act 1989 which is an enquiry to decide what type of action is needed to safeguard a child.

6.14 During 2019/20 there were 3,053 assessments completed at a rate of 505 per 10,000 children, up from a rate of 469 per 10,000 children in 2018/19. On average assessments were completed in 30 working days with over 90% completed in 45 working days as shown in the graph below. Although this is a slight dip on 2018/19

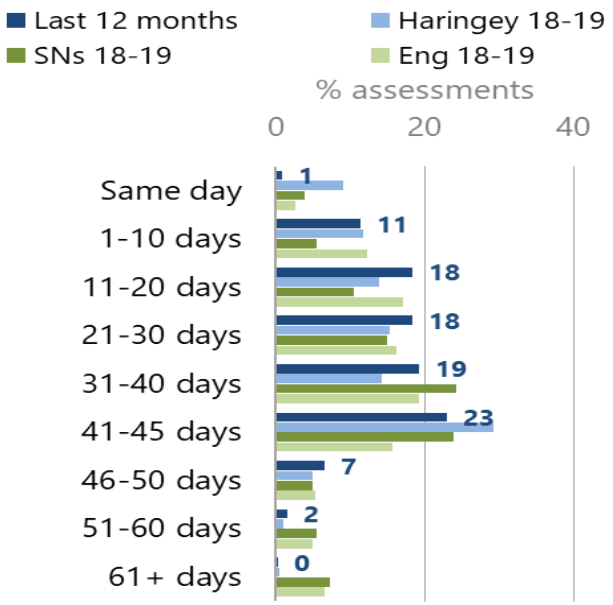
performance levels achieved (94%), it represents continued timely performance in the completion of assessments and remains better than the average for our statistical neighbours 81% in 2018/19.

Assessments completed in 45 working days



6.15 The average time taken to complete an assessment has improved from 35 working days in 2017/18 and has remained stable at 30 working days this year. This is very good performance and is better than both statistical neighbours and national averages as shown in the graph below. Whilst very few are completed outside of the timescales this is usually as a result of the complexity of the issues.

Comparing timeliness

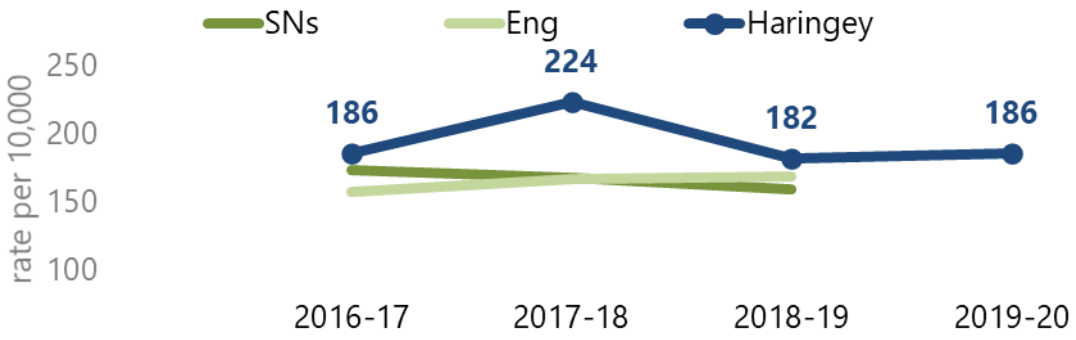


Section 47 enquiries

6.16 As noted above, Section 47 enquiries are carried out when there is a referral in which a child or children are reported to be at immediate risk of harm. This follows a multi-agency strategy meeting. Ofsted reported that 'agency strategy meetings are timely and are well attended by a range of professionals…' Child protection enquiries are generally thorough. Appropriate action is taken to safeguard and protect children, including, where appropriate, emergency applications to the family courts to remove children from situations of immediate harm' (Ofsted, Focused Visit December 2019).

6.17 The rate of section 47 enquiries per 10,000 children aged 0-17 increased to a rate of 186 per 10,000 children from 182 in 2018/19 and our rate remains above the last published rate of 159 for comparator boroughs and the England average rate of 168.

Rate of Section 47 enquiries per 10,000 children aged 0-17

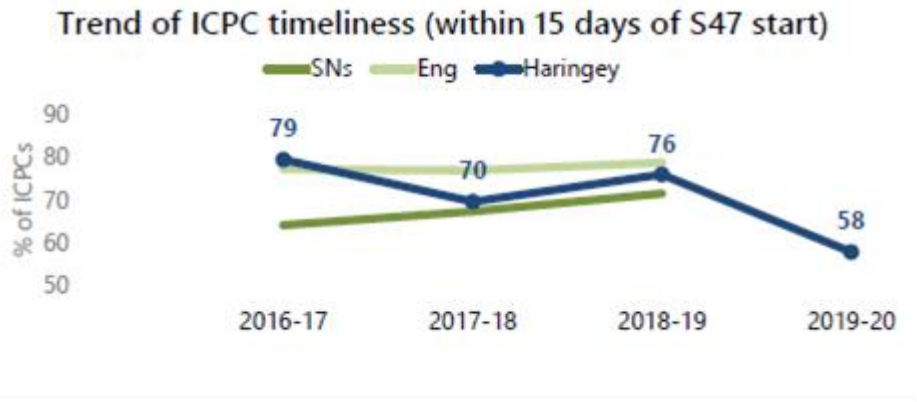


Initial Child protection conferences

6.18 Following section 47 enquiries an initial child protection conference brings together family members (and the child where appropriate) with appropriate support, and practitioners involved with the child and family to make decisions about the child's future safety, health, and development. This conference brings together all relevant information and it is the responsibility of the conference to make recommendations on how organisations will work together to safeguard the child.

6.19 17% of all Section 47 investigations led to an Initial Child Protection Conference (ICPC) this year. This has reduced for the last two years where more Section 47s were progressing to an ICPC. There were no children with a repeat ICPC within 12 months of the latest, this has come down from below five children in 2017/18. 83% of section 47s that were completed did not require an ICPC and of those that progressed to ICPC just over three quarters progressed to a Child Protection Plan.

6.20 It is critical that initial child protection conferences are convened quickly, and this is an area where performance showed a decline in the six months to March 2020. The graph below shows that in the last 12 months (April 2019 to March 2020) only 58% of ICPCs were held within 15 working days in Haringey compared to last year's 76% and the statistical neighbours average of 72%. However, approximately 75% are completed within 18 days.

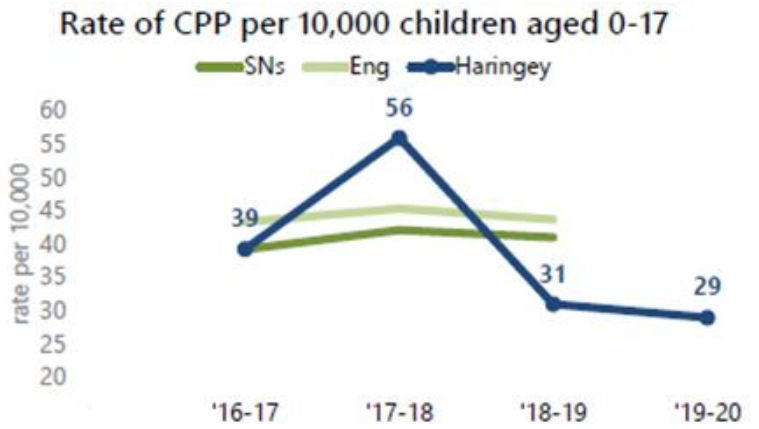


6.21 A review conducted to examine the reasons for the late presentations found that this was for the majority of cases due to the organisation and management of the administrative resources which are now dedicated to this function. Children's Social Care assumed the management of the business support function in January 2020 and the review noted that the performance increased from 33% to 74% in the first quarter for 2020/21. With skilled administrators in the service holding responsibility for the recording and central administration the timeliness has improved.

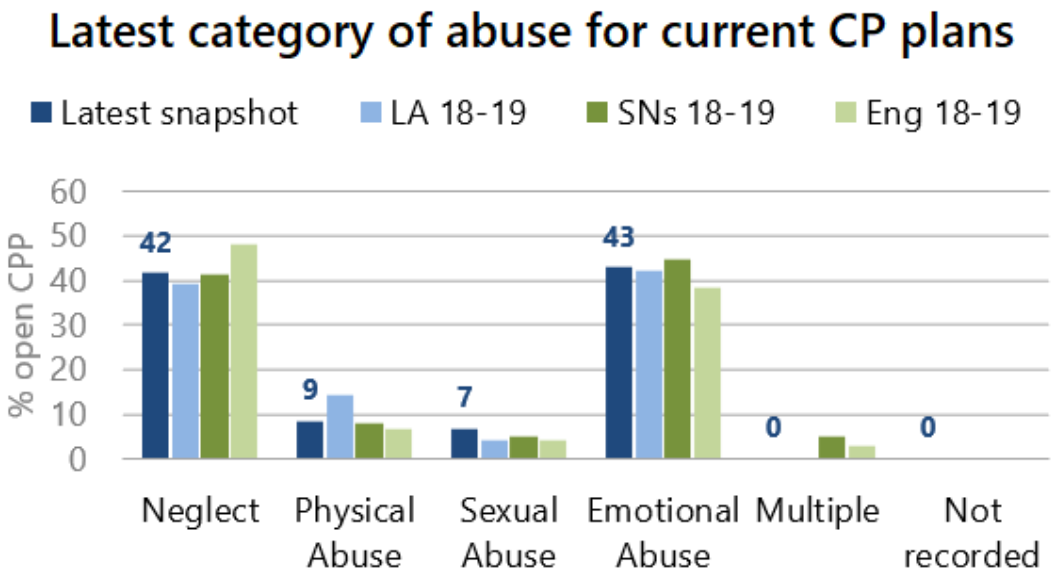
Child protection

6.22 The aim of a child protection plan is to ensure the child is safe from harm and prevent further suffering and harm. The plan should promote the child's health and development and support the family and wider family members to safeguard their child provided it is in the best interests of the child.

6.23 At the end of March 2020, 77% of initial child protection conferences resulted in a child protection plan. There were 175 children on a child protection plan at the end of March 2020. This child protection rate has remained fairly stable since 2018/19 at a rate of 29 per 10,000 children at the end of March 2020 having come down from a significantly higher rate of 56 in 2017/18. At the end of March 2020 this remained below our statistical neighbours' average rate of 41 Child Protection Plans per 10,000 children and the national rate of 44 as shown in the table below.



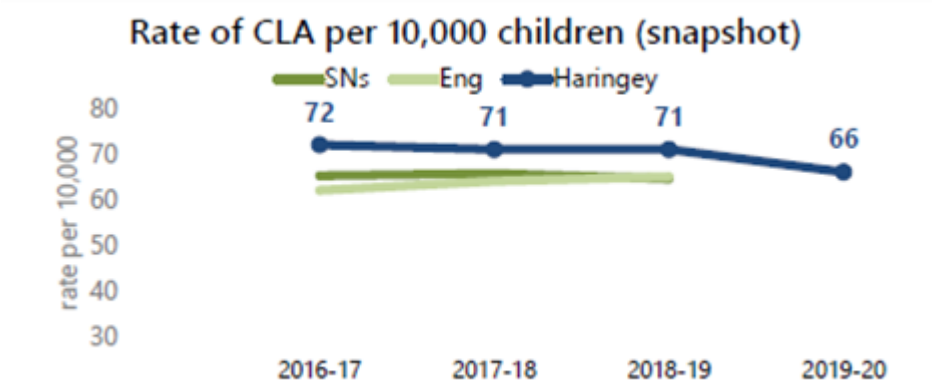
6.24 In common with other local authorities, the main child protection issues relate to emotional abuse and neglect as shown in the table below and our rates are largely in line with statistical neighbours. This shows that at the end of 2019/20 (latest snapshot) 42% of open child protection plans were as a result of neglect and 43% were as a result of emotional abuse.



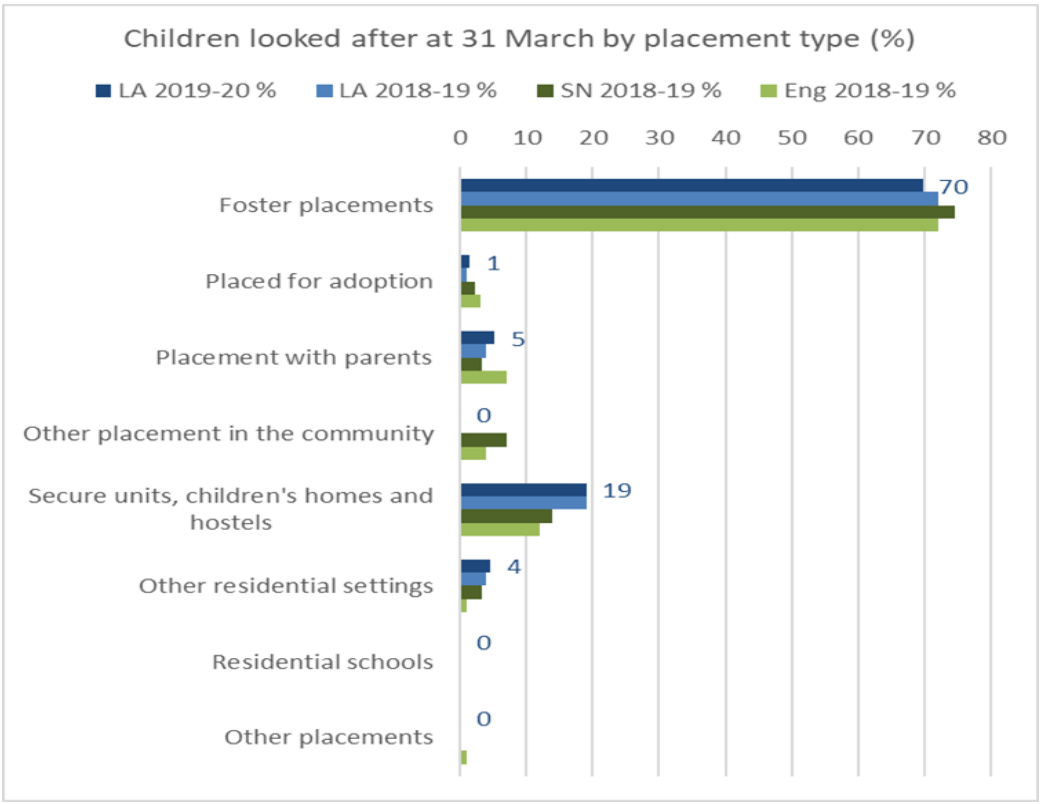
Children in care

6.25 A child who has been in the care of a local authority for more than 24 hours is known as a looked after child. Looked after children are also often referred to as children in care. Looked after children in general are either living with foster parents, in a residential children's home or living in residential settings like schools or secure units. Children come into care for a variety of reasons, including because they are unaccompanied asylum seeking children with no responsible adult to care for them or children's services may have intervened because it was believed that the child was at significant risk of harm. A child stops being looked after when they are adopted, return home or turn 18. However local authorities are required to support children leaving care at 18 until they are 25.

6.26 At the end of March 2020, the number of children in our care reduced slightly to 396. This is a rate of 66 children in care per 10,000 children and has closed the gap between our statistical neighbours and England rates of 65. In Haringey, 32 children in care (8%) have a disability.

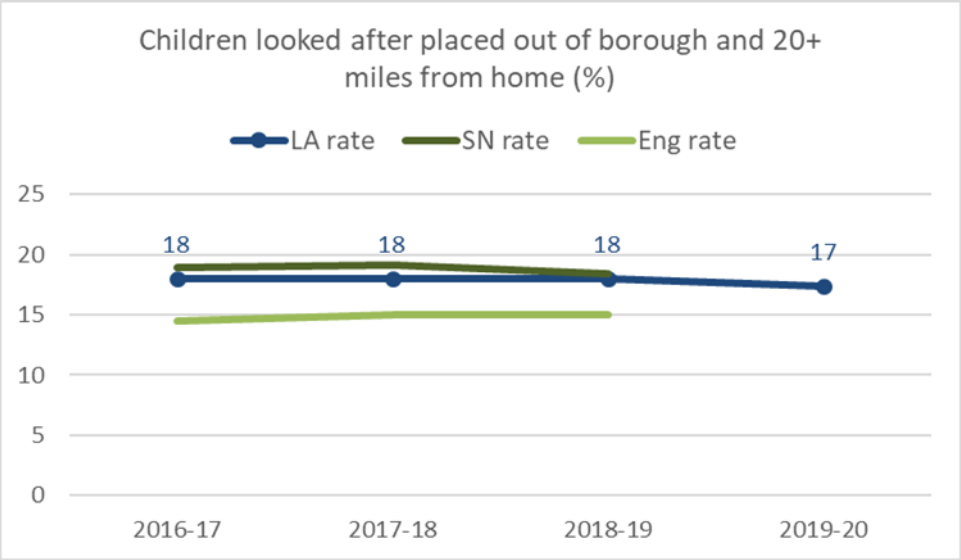


6.27 The majority of children in care were in foster placements (263 out of 396) and 37 were in residential accommodation, slightly down on 39 at the end of March 2019. The chart below shows the children in care by placement type at the end of March 2020.



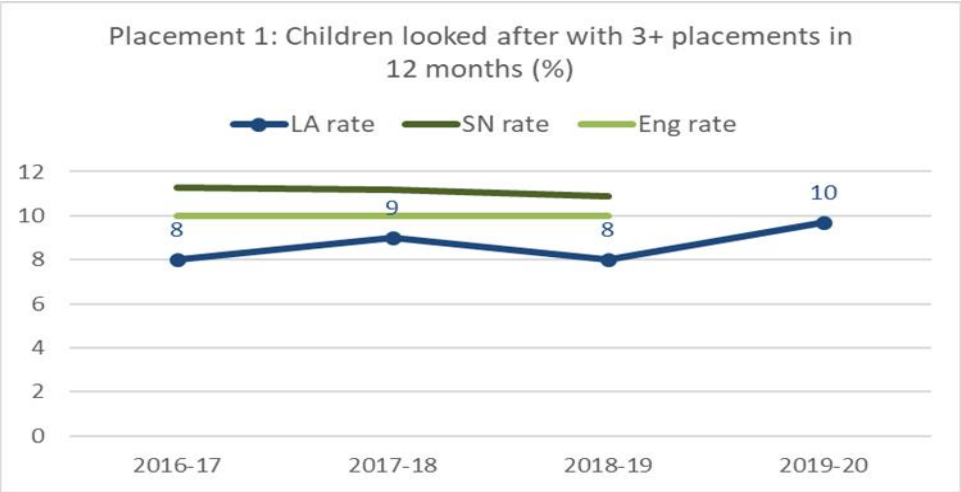
6.28 At the end of March 2019/20, 17% of children were in placements out of our borough and more than 20 miles from home as shown in the graph below. This is higher than the national average (15%) and in line with statistical neighbours (18%) and is a focus for improvement. Local provision continues to be a challenge

and we are working with our North Central London partners to develop this. When placing children out of borough we do take into account the education and CAMHS provision young people will receive in their new placement, taking note of pressures in receiving boroughs.

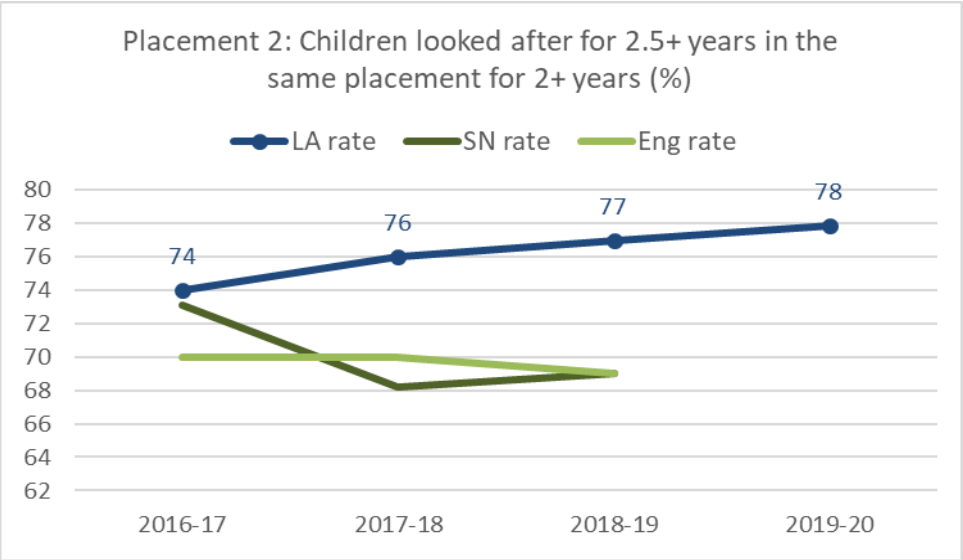


6.29 Placement stability is a key factor in children's wellbeing. Having the chance to settle into a foster or residential placement over a period of time gives children a feeling of belonging, helping them feel secure in themselves and their identity. Stability will be achieved only by making sure that the child is in the right placement for them. There are two types of placement stability that we measure – short term stability which looks at the number of placements in the last 12 months and long term stability which considers those children who have been looked after for more than two and a half years and have been in the same placement for more than two years.

6.30 Our short-term stability performance shows that 10% of children in our care had three or more placements in 12 months. This is slightly better than last reported statistical neighbour data (11%) and in line with national averages.



6.31 Our performance in relation to long term placement stability is very good and 78% of children who have been looked after for more than two and a half years have been in the same placement for more than two years as shown in the graph below. This is better than the last reported national and statistical neighbour performance of 69%.



6.32 Ofsted did note that '*more needs to be done to ensure that there are places available for vulnerable adolescents ….inspectors found examples where vulnerable adolescents had multiple placement moves and the local authority was struggling to find a suitable placement to meet their needs'* (Ofsted Focused Visit, December 2019). As a result of this, the fostering service is recruiting and supporting existing foster carers to further develop the skills needed to support children with more complex needs and we have formally joined the North Central London Commissioning partnership to work together on commissioning Tier 4 beds and placements for adolescents.

6.33 The establishment of the Adolescent Resource Panel, launched in May 2020, now ensures that young people at risk are identified and a full case discussion is held to identify the offer best suited to the family's needs.

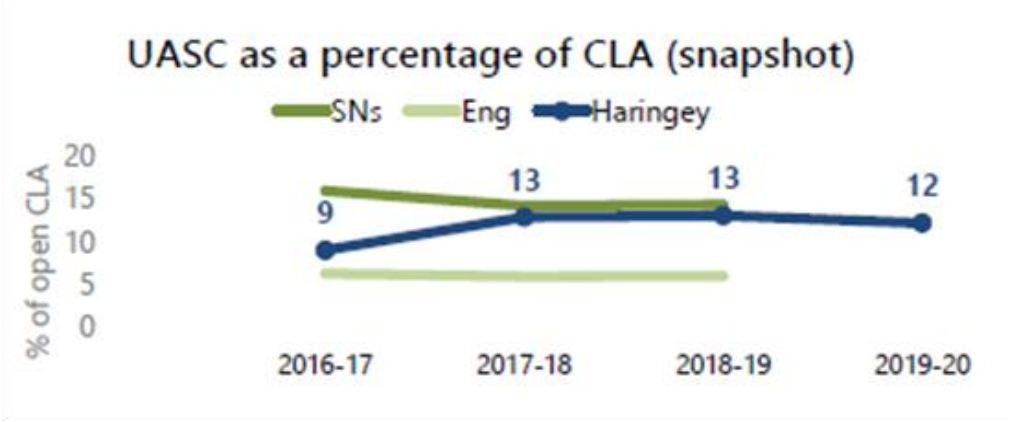
6.34 As part of our prevention work to support families to stay together and reduce the risk of children entering care we are working with the 'Positive Families Partnership' to identify young people at risk and offer them multi-systemic or family functional therapies.

6.35 This project went live in September 2019 and to the end of June had worked with nine young people, of whom five have successfully completed their treatment and remained out of care. Additional benefits achieved through this programme include helping young people remain in education, reducing crime and reducing exploitation.

6.36 The new Violence, Vulnerability and Exploitation service has also been developed in response to the challenges faced by young people in Haringey. Exploitation support workers work directly with children who are looked after, on

a child protection plan or who are a child in need. The service has put in place robust operational practice and systems and runs a multi-agency panel to offer services and recommendations to children and families at risk of exploitation. The panel utilises the VOLT (victim/offender/local/themes) application to consider what disruption, intervention or protection is needed. Children who go missing, especially those who go missing repeatedly, have benefited from the consistent approach from the return home interview officer.

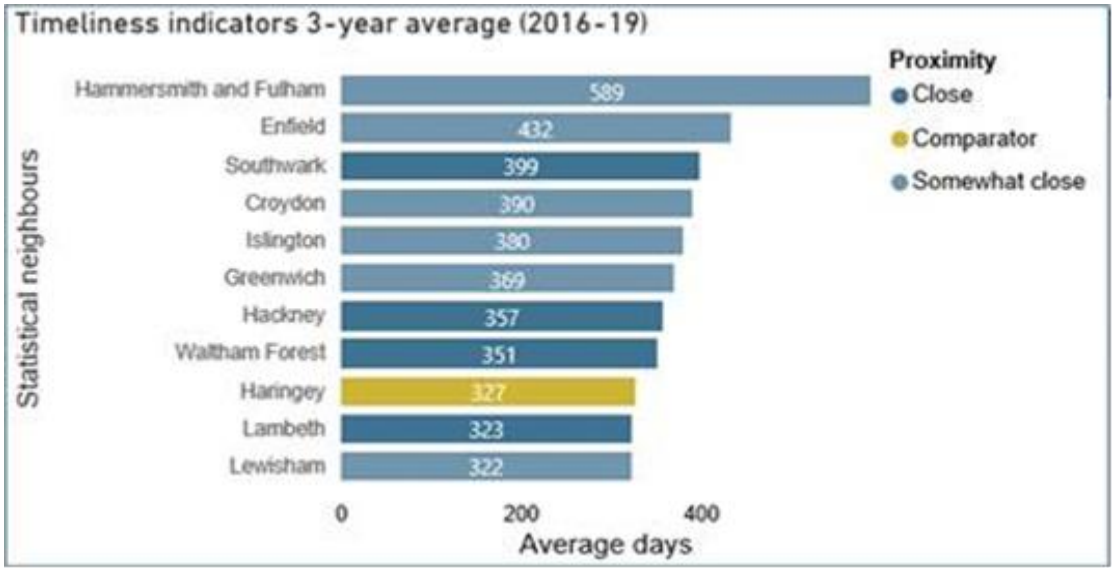
6.37 At the end of March 2020 there were 48 unaccompanied asylum-seeking children (UASC) in care, the majority were male (43). At around 12% of the children in care cohort. This is in line with statistical neighbours but above the national average as shown in the graph below.



Adoption

6.38 There were 10 adoptions by the end of March 2020. This equates to 4% of children who ceased to be looked after and although a decline from 6% the previous year, is broadly in line with the 5% average achieved by our statistical neighbours although falling short of the 12% average achieved nationally. In 2019/20 it took on average 568 days from the date the child entered care to the date the child moved in with their adoptive family and this reflects a slightly longer timescale than in the period 2018/19 (473 days). As part of our work to improve permanence for children, we have a new permanence planning process that identifies parallel plans for prospective adoptions. Additionally, family group conferences, which draw on the extended family to help provide support and care, are used more frequently.

6.39 One of the key measures is the timeliness of adoptions over a three-year period. On this measure Haringey is third best compared to statistical neighbours as shown in the adoption scorecard below.



6.40 From October 2019 the main elements of the adoption service were delivered through the regional adoption agency, Adopt London North, as agreed by Cabinet in March 2019 and as required by Government legislation. The Regional Adoption Agency will continue to be accountable to participating authorities' corporate parenting boards and other bodies and will deliver the following main services across North London:

a) recruitment and assessment of prospective adopters including marketing and recruitment strategy.
b) permanence planning including tracking and monitoring children possibly requiring adoption;
c) matching and placement including family finding; and
d) adoption support including assessment for adoption support; developing and delivering adoption support plans and funding applications to the Adoption Support Fund.

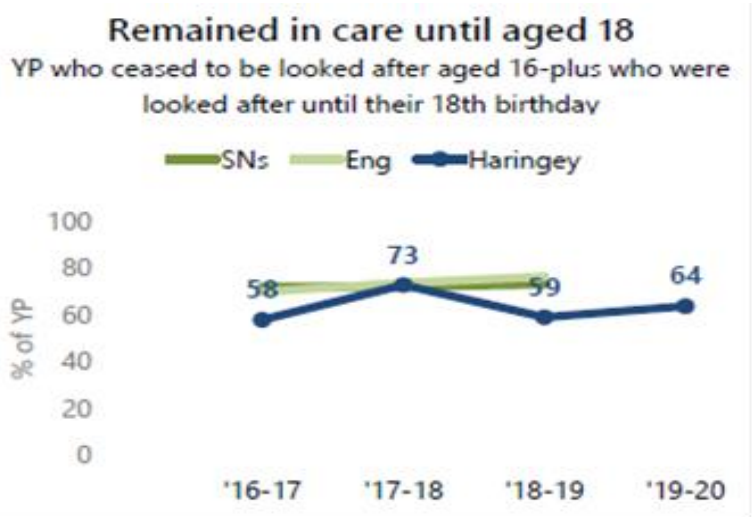
Leaving care

6.41 The Ofsted report from October 2018 records that "services for care leavers have improved significantly since the last inspection, and they are well supported to achieve good outcomes and prepare for adulthood".

6.42 At the end of March 2020 there were 407 care leavers receiving leaving care support. The number of care leavers being supported has increased by over 100 since pre-2017 levels and has fluctuated from 339 in April 2017 to 428 in October 2018 and currently there are 423 care leaver allocations.

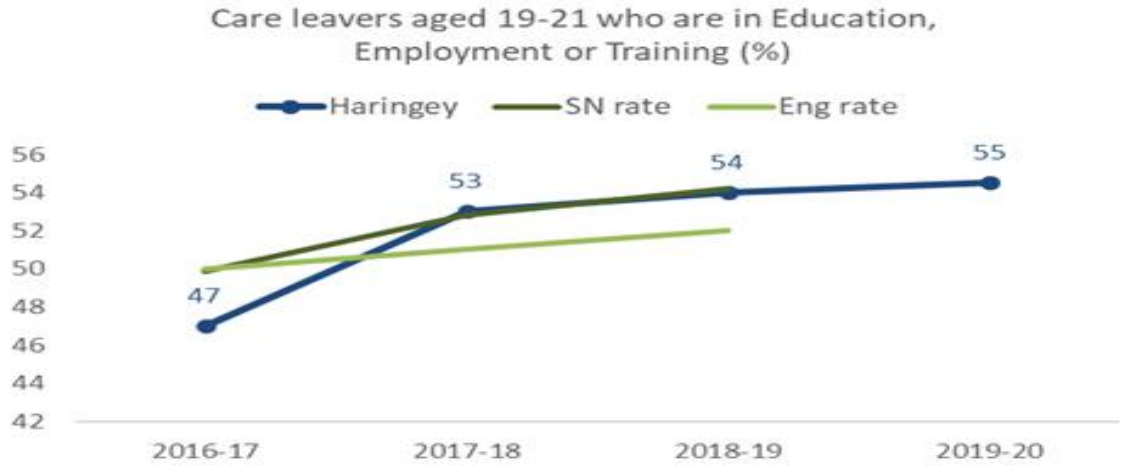
6.43 The service has this year been working with the new duty on local authorities to support all care leavers up to age 25 who can return to the local authority at any point after the age of 21 and request support. The legislation has impacted the capacity of the young adultsEuc service with a decrease in 16+ children in care cases but an increase in the number of returning care leavers where we have a duty to support them.

The graph below shows that increasing proportions of young people are remaining in care until they are aged 18. In the 12 months to March 2020, 64% of young people who ceased to be looked after aged 16 plus were looked after until their 18th birthday.



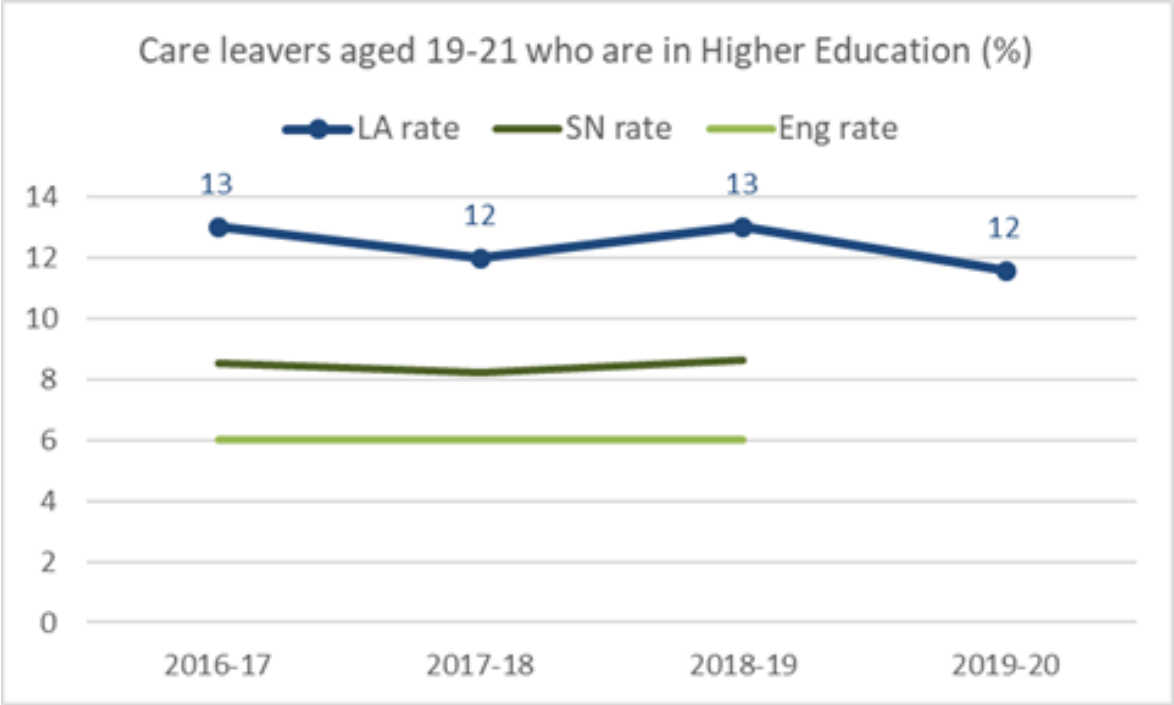
6.44 The percentage of care leavers aged 17-18 in education, employment and training increased slightly from 79% in 2018/19 to 80% in the year. There has been a slight improvement for older care leavers aged 19-21 where 55% are in education, employment and training this year compared to 54% in 2018/19 and 54% average for our statistical neighbours.

Education, Employment or Training of 19-21-year olds



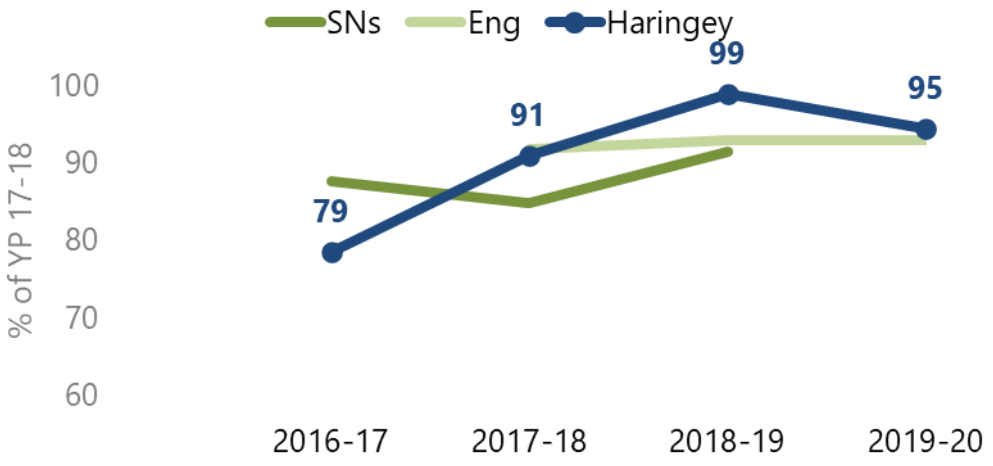
6.45 Haringey also performs extremely well with regard to care leavers aged 19-21 in higher education and at 12% is double the national rate and higher than our statistical neighbours.

Care Leavers 19-21year olds who are in Higher Education

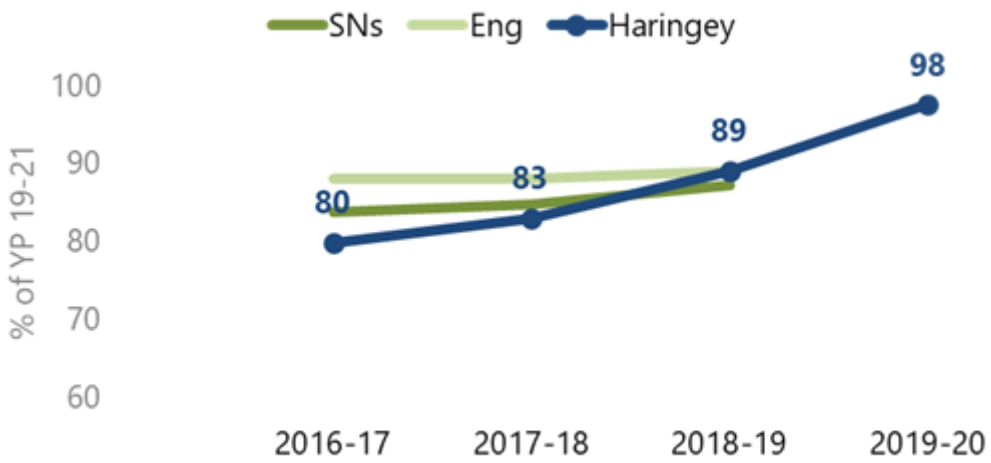


6.46 In Haringey, 95% of young people aged 17-18 and 98% aged 19-21 are in touch with the service representing continued good performance compared to statistical neighbours and England as shown in the graphs below.

Local authority in touch with 17-18 year olds

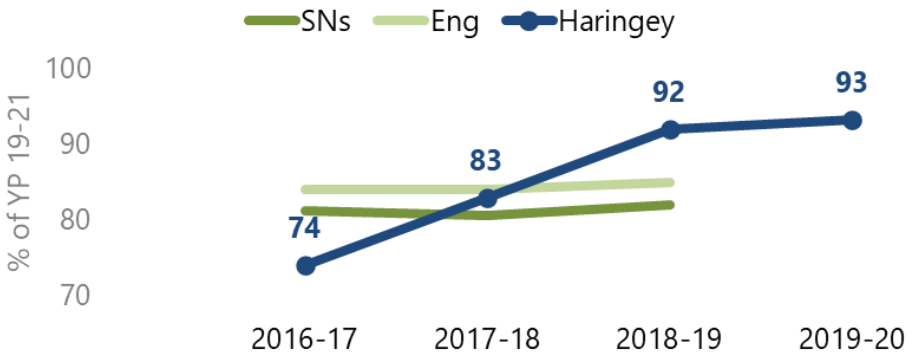


Local authority in touch with 19-21year olds



6.47 Over the past three years there has been a significant improvement in the percentage of care leavers aged 19-21 in suitable accommodation at 93%, which is up from the good performance of 83% in 17/18. However, the percentage of care leavers aged 17-18 in suitable accommodation has remained stable at 88% (was 91% in 2018/19) and is in line with last reported data nationally (88%) and slightly better than statistical neighbours (87%).

Accommodation suitability of 19-21-year olds



Children with a Disability

6.48 The Disabled Children's Team (DCT) has continued to be a focus for improvement and remains on a journey to improve the quality of care to children and change the culture in the team.

6.49 The team's improving child focus and awareness of safeguarding is evidenced by a significant increase in the percentage of children on a child protection plan with a disability since 2017/18 – from 1% to 7%.

Year	No. of Children on a CP Plan with a disability	% of Children on a CP Plan with a disability
2017/18	4	1%
2018/19	7	4%
2019/20	12	7%

6.50 The service has had additional investment in the team to increase capacity which has included additional management and plans to recruit a CAMHS practitioner with a specialism in autism and mental health needs. All practitioners are required to have level 3 safeguarding training and the team managers have taken part in a four-month Research in Practice programme (Managing Risk and Safeguarding) to support their development.

6.51 Regular monitoring of performance data shows improvement in timeliness for visits, supervision and management oversight and completion of assessments. At the end of March 2020 monitoring showed that 63% of children's cases had an up to date visit and 82% of cases had either up to date supervision or management direction. Although still on an improvement journey, this reflects significant improvement where data at the end of March 2019 was significantly worse with supervisions at 35%.

6.52 Following a critical judgment by a judge in the current year relating to a case within the DCT, a number of independent reviews and audits were commissioned to determine, amongst others, whether there were deep rooted and widespread systemic failings in evaluating risk and prioritising the needs of the child. Also, to identify where improvements needed to be made, and provide assurance about the robustness of processes and systems.

6.53 The audits and reviews will not be completed until the end of November 2020 and the final findings will be reported to the Haringey Children's Safeguarding Partnership where the actions and recommended improvements will be monitored to ensure the required changes are implemented, and in line with a learning culture approach.

7. Recruitment and retention of social workers

7.1 As noted above, stable placements are important for children to thrive. So too are stable and strong relationships with consistent professionals which contribute towards helping children and young people feel safe and ready to succeed. A permanent skilled workforce is essential for relationship based social practice to thrive. Along with other councils around the country, children's social care service continues to experience difficulties in recruiting experienced social workers as this a national challenge. The borough had a high proportion of agency staff in particular frontline teams during 2019/20.

7.2 This has been a significant area of focus over the last year and Ofsted noted it as an area for improvement and reported that '*while having some success, leaders have struggled to sufficiently recruit and retain staff. Leaders are diligent about considering reasons why recruitment remains so difficult, including remuneration packages offered by neighbouring authorities'* (Focused Visit, December 2019).

7.3 At the end of March 2020, the rate of agency workers has declined to 35% of the social care workforce (71 agency social workers) from 29% at the end of March 2019. In part this reflects some desired turnover as a result of the need for change and improvement. It does however also reflect the national challenges in recruiting social workers to some key frontline roles.

7.4 At the end of March 2020, the service had been successful in recruiting a permanent Assistant Director, permanent Heads of Service as well as the Principal Social Worker. The majority of service managers were also permanent, with only two interims. The service continues to run recruitment campaigns to attract experienced staff and newly qualified social workers and we have had significant success in converting agency staff to permanent members of staff too. Additionally, we commenced recruiting a cohort of fourteen social workers from South Africa that are being inducted into the service during August and September. This recruitment and stability in senior management is now delivering results and it is anticipated that by October 2020, 81% of the social care workforce will be permanent staff (compared to 63% at the end of March 2020).

7.5 From a 'Grow our Own' recruitment perspective, there will be 10 Newly Qualified Social Workers joining the service from September 2020 onwards enabling the release of agency workers once the cohort of newly qualified social workers satisfy the service standards and expectations. The service is also now focused on recruiting permanent team managers.

7.6 It is critical that we continue to drive forward our workforce strategic priorities. To support this there are several retention activities underway and many which have already been completed to ensure retention of the Children's Services workforce. These range from the launch of the Children's Services Academy in November 2019 which continues to focus on providing learning platforms for qualified and unqualified roles as well as frameworks for "Growing our Own". The Children's Service Workforce Strategy 2020 – 2023 which includes priorities focusing on Health and Wellbeing, Diversity and Inclusion, Learning and Development as well as Recruitment and Retention.

7.7 Our staff are actively encouraged to feedback their thoughts on working in Children's Services and have several platforms in place for this such as Director Roadshows, service specific staff engagement surveys and 'staying interviews' which take place when someone indicates they may be intending to leave the service. Children's Services recognises that their workforce is pivotal in ensuring that they not only achieve their strategic objectives but also put the voice of the child at the heart of everything they do.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

8.1 Finance

8.1.1 Children's Social Care finished the 2019/20 financial year with a £1.8m pressure on a £41.4m controllable budget. This is a £3.2m reduction from the previous financial year.

8.1.2 For the new year (2020/21), the service has a further £2m of savings to deliver. The progress on this and the impact of COVID-19 on the service continues to be monitored closely.

8.1.3 The report presents no further financial implications.

8.2 Procurement (NA)

8.3 **Legal**

8.3.1 Under the Children Act 1989, the Council is responsible for safeguarding and promoting the welfare of children in need in its area. The annual report serves to inform Cabinet of Children Social Care performance in 2019/20 in the discharge of the Council's children safeguarding obligations. The report is for noting and there are no legal implications arising from the recommendations.

8.4 **Equality**

8.4.1 The Council has a public sector equality duty under the Equalities 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 people who do not
- Foster good relations between people who share those characteristics and people.

9. Use of Appendices

None

10. **Local Government (Access to Information) Act 1985**

– Statutory Guidance on the roles and responsibilities of the Director of Children's Services and the Lead Member for Children's Services

– Working Together to Safeguard Children 2018 guidance

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Report for: Cabinet 13 October 2020

Title: Extension and variation of Alcohol & Dog Control Public Space Protection Orders

Report authorised by: Stephen McDonnell, Director of Environment & Neighbourhood

Lead Officer: Eubert Malcolm, Assistant Director, Community Safety & Enforcement (020 8489 5520 eubert.malcolm@haringey.gov.uk

Ward(s) affected: All wards for Dog Control / 11 Wards for the control of alcohol

Report for Key/ Non-Key Decision: Key

1. Describe the issue under consideration

1.1 The Council's existing Public Space Protection Orders (PSPO) for Alcohol & Dog Control expire on the 19th October 2020.

1.2 On 10th March 2020 the Cabinet gave approval to consult on the extension and variation of the existing PSPOs and the purpose of this report is to present the outcome of the PSPO consultation and to seek Cabinet approval for the extension and variation of the PSPOs.

2. Cabinet Member Introduction

2.1 I am happy to bring forward this cabinet report to extend the current PSPOs for a further three year period. I am particularly pleased that the Woodside Ward Alcohol PSPO will be extended to include Chapmans Green park off Lordship Lane. During a recent litter pick in the park with local residents I saw first-hand the damage alcohol abuse does to the environment and the health and well-being of those who are addicted to drink. I can also confirm that we will look at the proposal for a borough wide PSPO. Of course, enforcement has its place, but it cannot be the sole method of addressing complex social problems such as street drinking. The council is committed to working with our partners in the NHS and the Police to proactively address these challenges.

3 Recommendations

3.1 Cabinet is asked to:

a) Approve the extension of the 11 PSPOs for the control of alcohol until 18 October 2023

b) Approve varying the boundary of the Woodside alcohol PSPO to include Lordship Lane, Chapmans Green Park and the roads directly surrounding Chapmans Green Park as set out in the map on page 5 of Appendix 12.

c) Approve the extension of the borough wide dog control PSPO until 18 October 2023

d) Approve varying the dog control PSPO to impose a new requirement that dog owners produce a device or other means for removing dog faeces when requested by an officer.

4. Reasons for decision

4.1 On 20th October 2017 Haringey replaced its 11 Designated Public Places Orders (also known as Alcohol Control Zones) and Dog Control Orders, with Public Space Protection Orders, with requirements and prohibitions mirroring the previous Alcohol Control Zones and Dog Control Orders. A PSPO remains in place for three years unless extended or discharged by the Local Authority. The existing PSPOs enacted on the 20th October 2017, relating to alcohol and dog control expire on the 19th October 2020.

4.2 The Anti-Social Behaviour, Crime and Policing Act 2014 states that before the time when a PSPO is due to expire, the local authority that made the order may extend the period for which it has effect, and/or vary the order, if satisfied on reasonable grounds that doing so is necessary to prevent:

(a) occurrence or recurrence after that time of the activities identified in the order, or

(b) an increase in the frequency or seriousness of those activities after that time.

4.3 On 10 March 2020, the Cabinet agreed that the proposal to extend and vary the PSPOs should be taken to public consultation. The Consultation process began on the 7 July 2020 and continued for 6 weeks ending on Monday 18th August 2020.

4.4 For the PSPOs to be extended and varied Cabinet must consider the outcome of the consultation and EQIA and make a decision before the PSPOs expire on 19th October 2020.

5. Alternative options considered

5.1 A discharge of the current Alcohol and Dog Control PSPOs on 19th October 2020 and/or no variation or addition.

5.2 The Alcohol Control and Dog Control PSPOs will lapse on 19th October 2020 if not extended. Not having valid PSPOs in place will have a detrimental impact on the Police and Council officers' ability to enforce drinking and dog-related nuisance across the borough. This may then lead to increased dog fouling, dogs being causing a nuisance and not being adequately controlled, dogs entering children's play areas, sports areas and marked pitches and an increase in people drinking alcohol and engaging in behaviour likely to cause nuisance and annoyance to residents and other members of the public.

5.3 This option would be contrary to the need for the PSPOs to continue and the public support for their continuation. It would also result in the re-occurrence of the activities that are detrimental to the quality of life of people who live, visit or work in the areas where the PSPOs can be enforced.

6. Background information

6.1 The existing PSPOs enacted on the 20th October 2017, relating to alcohol and dog control expire on the 19th October 2020. A PSPO remains in place for three years unless discharged by the Local Authority.

6.2 The Police and Council are responsible for tackling anti-social behaviour. PSPOs are an effective deterrent to deal with particular nuisance or problems in a particular area that is detrimental to the local community's quality of life.

6.3 A PSPO works by imposing conditions on the use of that area, which apply to everyone. A PSPO is designed to ensure that residents and visitors can use and enjoy public spaces without experiencing anti-social behaviour.

6.4 In accordance with s60 (2) of the Anti-Social Behaviour Crime and Policing Act 2014 (the Act), a PSPO cannot have effect for more than 3 years, unless extended under s60 (2). This section permits a local authority to extend a PSPO where it is satisfied on reasonable grounds that doing so is necessary to prevent an occurrence or recurrence of the activities identified in the order.

6.5 The introduction of PSPOs for alcohol control has enabled the Police to remove alcohol from those that are engaging in or are likely to engage in anti-social behaviour.

6.6 The PSPO for Dog Control enables officers from the Police and Council to give direction in regard to dogs off lead and dogs causing nuisance in a public place, this includes dog fouling and other related dog issues.

6.7 The existing PSPOs came into force on the 20th October 2017. These have enabled the Council and the Police to take preventative enforcement action in public places on:

- Dogs fouling on land.

- Dog exclusion in specified areas.
- Dogs on lead in specified areas.
- Dogs on lead by direction.
- Dogs specified maximum amount.
- Alcohol consumption in a prohibited area.

6.8 Detailed information is outlined below:

- **Dogs fouling on land**
  If a person allows a dog, they are responsible for at that time to foul and walks away without picking up the faeces an officer can issue a Fixed Penalty Notice or provide evidence for legal action through the court. This is a borough wide order and applies to all land to which the public have access.

- **Dog exclusion in specified areas**
  Dogs are excluded from specific locations within Haringey; this includes children's play area/grounds. Dogs are prohibited from entering marked pitches in parks and open spaces when in use. An officer can take action by means of issuing a Fixed Penalty Notice or provide evidence for legal action through the court if the person responsible for the dog allows it to enter the exclusion areas.

- **Dogs on lead in specified areas**
  If a person does not comply with placing their dog on a lead on roads and estates managed by Homes for Haringey (including pavements, footways, verges, pedestrianised areas, cemeteries) an officer, can take action by means of issuing a Fixed Penalty Notice or provide evidence for legal action through the court.

- **Dogs on lead by direction**
  If a person does not comply with placing their dog on a lead at the request of an authorised officer, the officer or the Police can take action by means of issuing a Fixed Penalty Notice or provide evidence for legal action through the court.

- **Dogs Specified Amount**
  One person can take out no more than six dogs at any one time, an officer can issue a Fixed Penalty Notice or provide evidence for legal action through the court.

6.9 During the period of January to December 2018, the Council received 82 complaints about dog fouling. The following year January 2019 to December 2019, the Council received 48 reports.

The Council's contractor Veolia is responsible for clearing dog faeces from Haringey streets. Residents made 1,038 reports to Veolia requesting the removal of dog faeces from streets within the borough during the period 1st October 2017 to 31st October 2019.

6.10 It is difficult to take action against dog owners who fail to pick up faeces, as this is reliant on officers witnessing the offence. Having an amendment to the current PSPO making it an offence for dog owners not to produce a device or other means for removing dog faeces upon request, will enable officers to issue a Fixed Penalty Notice to those not carrying a receptacle or device to remove dog faeces. This will enable officers to take action against irresponsible dog owners who allow their dogs to foul land and who do not intend to clean up after their dog.

6.11 The variation of the Dog Control PSPO in regards points 6.10 above will not apply to a person in control of a working dog that has been trained to assist a person who has a disability.

6.12 The Dog Control PSPO is not put in place as a means to restrict the exercising or recreation of dogs across Haringey. The reason for making the Order is to address the detrimental effect on the quality of life of those in the locality caused by the irresponsible behaviour of a small minority of dog owners; and to set out a clear standard of behaviour to which all dog owners are required to adhere.

6.13 The Dog Control PSPO and Map is attached at Appendix 1

7. **Alcohol Consumption in prohibited areas**

If a person who is drinking alcohol or carrying alcohol in an open can, an officer can request the person to (1) surrender their alcohol or pour it away (2) not to continue to drink alcohol when required to do so. Failing to do so allows the officer to take action by means of issuing a Fixed Penalty Notice or provide evidence for legal action through the court. There are 11 PSPO areas in Haringey controlling the consumption of alcohol.

7.1 It is not an offence to drink alcohol in a controlled drinking area. It is an offence to fail to comply with a request to stop drinking or surrender alcohol in the area covered by the Order.

7.2 Failure to comply with either a prohibition or requirement is an offence. A breach of the Order can incur a Fixed Penalty Notice of £100.00 or a fine not exceeding level three (£1000.00) upon summary conviction.

7.3 There are various tools, which the Council and the Police can use to manage crime and disorder in the borough with or without alcohol as a qualifying factor these include

- The Licensing Act 2003;
- The Anti-Social Behaviour, Crime and Policing Act 2014;
- Review of Premises Licences;
- Confiscation of Alcohol (Young Person) Act 1997 a Police officer can remove alcohol from a person suspected of being under age; and
- Licensing Act 1872 on the spot penalties for being drunk on the highway or other public place. For exhibiting disorderly, conduct whilst drunk in a public place (Criminal Justice Act 1967). The Police can also deal with

behaviour causing harassment, alarm or distress (with or without alcohol as a qualifying factor).

7.4 A review of the current PSPOs highlights the need for a continuation of powers to tackle individuals drinking on the street.

7.5 A review of the current PSPOs shows there were 2608 related calls, which were flagged as alcohol/licensing related between 2017 - 2019. By far the highest proportion of these were related to incidents in the wards of Noel Park, Northumberland Park and Tottenham Green. Far fewer incidents were reported in Alexandra, Muswell Hill and Highgate wards.

7.6 Over the same period, The London Ambulance Service (LAS) received 3949 callouts for alcohol related matters in the past two years. This includes both injuries where alcohol was believed to have been a factor as well as illnesses related to alcohol, where an ambulance was required. Tottenham Green, Bounds Green and Noel Park had the highest volume of these callouts. In contrast, Alexandra, Stroud Green and Crouch End had relatively few callouts.

7.7 Data from the London Ambulance Service and the Police shows alcohol related nuisance and emphasises the need for the PSPOs to continue within these wards:

London Ambulance Service (LAS) Alcohol Callouts

Ward	**LAS Alcohol Calls**
Alexandra	59
Bounds Green	373
Bruce Grove	229
Crouch End	101
Fortis Green	108
Harringay	181
Highgate	103
Hornsey	124
Muswell Hill	134
Noel Park	372
Northumberland Park	325
Seven Sisters	223
St Ann's	208
Stroud Green	81
Tottenham Green	444
Tottenham Hale	311
West Green	198
White Hart Lane	135
Woodside	240
Haringey Total	**3949**

CAD ASB Reports to Police with an Alcohol / Licensing Nuisance Code

Ward	CAD Alcohol
Alexandra	43
Bounds Green	158
Bruce Grove	196
Crouch End	67
Fortis Green	81
Harringay	138
Highgate	55
Ward	**CAD Alcohol**
Hornsey	74
Muswell Hill	54
Noel Park	264
Northumberland Park	272
Seven Sisters	158
St Ann's	139
Stroud Green	59
Tottenham Green	308
Tottenham Hale	188
West Green	130
White Hart Lane	90
Woodside	134
Haringey Total	**2608**

7.8 Alcohol related reports in the past two years show evidence of clustering, with wards in the east (Northumberland Park / Tottenham Green) exhibiting high volumes, as well as a central clustering of Noel Park also featuring highly.

7.9 We have consulted on the extension of the Woodside PSPO. Council Officers and the Police are recommending a variation of the PSPO to extend the boundary. Chapmans Green is a small park on the junction of Lordship Lane and Dunbar Road, N22. There have been a number of complaints about individuals loitering, drinking and littering (discarded alcohol bottles/cans) in the park. Allegations have been made that some of the males loitering are drinking and engaging in drug dealing inside the park. We have received a number of reports from residents made through their Ward Councillors about these issues. We have had on site meetings with residents, the police and Ward Councillors.

7.10 There has also been reports that individuals have been drinking outside the Crown Court in Lordship Lane and outside the shops at the far end of Lordship Lane at the junction with Dunbar Road. The Woodside Policing Team have provided information of complaints received from residents about a number of criminal and anti-social behaviour incidents which have occurred over a two year period in the location of Lordship Lane and Chapmans Green Park. The extension of the PSPO will alleviate the alcohol related crime and anti-social behaviour within the area. The redacted police information is attached at Appendix 15

7.11 The PSPO orders for the 11 wards are attached at appendices 2-12

8.0 Consultation methodology and key outcomes

8.1 The consultation sought the views of those who are or may be affected by the extension and/or variation of these PSPOs and other stakeholders, in accordance with legislative guidelines on 'necessary consultation' as defined in section 72(4) and means consulting with the Police, community representatives and the owners or occupiers of land within the restricted area. Except where the land is owned by the Local Authority.

8.2 The consultation was publicised through letters, flyers and websites, reaching out to local residents, community groups, local businesses, key partners, such as parks services/associations, animal charities and vets, and statutory consultees (e.g. police, social landlords, local councillors). The consultation sought to specifically obtain the views of: -

a. People living, visiting, working, or studying in the 11 wards of the current Alcohol Control PSPOs; and
b. Residents and dog owners about the various conditions of the current Dog Control PSPO and proposed new requirement, which would require dog owners to carry bags or a means to pick up dog mess.

8.3 The consultation encouraged respondents to make comments about how they feel about the PSPOs, any proposed variations and any suggestions for further variations.

8.4 Details of the consultation were available online and online questionnaires were activated. The Consultation comprised of three separate surveys; Respondent could complete all surveys or just the ones most relevant to them.

8.5 A consultation Flyer publicising the consultation and methods to respond was produced. The flyer was distributed on the street in key high footfall areas (Wood Green High Road, Wood Green tube station, Seven Sisters Road), displayed in parks and area to be extend in Woodside Ward and delivered to vets in east, west and north patches.

8.6 A Consultation Letter was delivered to 119,000 households in the borough. The Consultation letter was also delivered to all businesses in High Roads and Main Roads of the borough and sent out to landowners and social landlords within the borough. The Consultation Letter was amended to focus specifically on alcohol issues and sent out to all licensed premises. In addition, all councillors across the borough were notified. Sample copies of the consultation letters can be found on pages 61 & 62 of the Consultation Report (Appendix 13).

8.7 The consultation flyer and a targeted consultation letter was also provided (by hand or via post/websites) to: -

- Dog walker groups/clubs within the borough
- The Kennel Club
- RSPCA and Dogs Trust
- Wood Green Animal Shelter

8.8 To ensure the consultation gave equal opportunity to all those who might want to submit responses in different ways and different formats, the online survey was also made available as a paper copy and responses and views could also be made via email or direct to the lead officer by post.. The consultation was open to all; however, Respondents were asked to specify: -

- Which of the 11 alcohol PSPO affected wards they live in, work in or visited
- If they have been affected by any specific alcohol related Anti-social behaviour
- If they are a Haringey resident
- If they are, have been or plan to be a dog owner

This was to assist the Council to better understand any variations in impact and opinion.

8.9 The headline results of the consultation include: -

a. 854 people living, working or visiting one of the 11 Alcohol control PSPO wards responded to the consultation survey 83.7% agreed that we should have a PSPO to deal with street drinking; 82.4% agreed that the PSPO affecting the area they live in, work in or visit should be extended for a further 3 years.

b. Just over half the respondents to the alcohol control survey (57%) agreed with the proposal that the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park; it is noted that 34.3% of respondents had no opinion in respect of this point.

c. 98.9% of respondents to the Dog Control PSPO survey were Haringey residents and an overwhelming majority were not dog owners.

d. An overwhelming majority of respondents agreed that the following conditions of the Dog Control PSPO should remain in place: -

- Dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access (97%)
- Dogs are excluded from fenced play areas set aside for children and marked sports pitches when in use. (92.3%)
- Dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare (89.6%)

- Dog owners to put their dog on a lead when directed to do so by an authorised officer, when on any land to which the public have access and where a dog is considered to be out of control. (94.6%)

e. 65.7% of respondents agreed that the condition that one person is permitted to walk a maximum of six dogs should remain in place. 25% of respondents supported this condition being varied with the vast majority of those respondents supporting that the maximum number be reduced to 4 or less

f. 95.2% of respondents agreed with the proposed new requirement for a person in charge of a dog to carry a means or device to pick up dog faeces, when exercising their dog(s)

8.10 Key comment in response to Consultation

a. It is noted that a common theme in additional comments is the concern that:

- *The current Alcohol Control PSPOs are limited to 11 of the 19 wards within Haringey.*
- *The Council should be considering a borough-wide Alcohol Control PSPO, as other boroughs have done or at least introducing alcohol control PSPOs in other areas affected by alcohol-related ASB e.g. Stroud Green ward, Green Lanes, Alexandra Ward*
- *Several locations were identified by Respondents as having alcohol-related ASB issues and would benefit from a PSPO.*

b. Other comments were that:

- *Police and council have inadequate resources to monitor and enforce the alcohol PSPO but having the PSPO is a start. Alcohol related ASB continued despite presence of a PSPO, but also noted that situation would be worse with no PSPO.*
- *The PSPO is an attack on social class. Drinking is only an excuse to give the police the right to punish homeless people and disadvantage social classes*

A more detailed analysis of the additional comments can be found in the Consultation Report at Appendix 13.

8.11 Council's response:

The consultation was limited to extending the duration of the current PSPOs. Only an extension of the boundary area of the Woodside Ward Alcohol PSPO was considered at this time, given the data available justifying the need for this extension. The Council will continue to gather data and collate evidence with a view to considering future consultations and review the potential to expand the Alcohol PSPO to other areas or borough wide.

The PSPO will not be used to target any particular group. As outlined above at 7.1, it is not an offence to drink alcohol in a controlled drinking area. The PSPO will be used to tackle anti-social behaviour resulting from the consumption of alcohol. It is the desire to reduce the nuisance caused that an authorised officer may request that an individual stop drinking or surrender the alcohol in their possession. The offence which can result in enforcement (the issuing of a fine) is where an individual fails to comply with this request, in the area covered by the Order. The Council acknowledges the prominence of street drinking amongst the street homeless population and other disadvantaged groups and will continue to work in partnership with support and outreach services to engage with relevant groups and undertake preventative and supportive initiatives in the first instance. This is expanded upon further within the EqIA at Appendix 14. Where is it emphasised that:

- the PSPO will be monitored and any disproportionate impact investigated and addressed
- Authorised officers will give consideration to needs of individual and personal circumstance in order to make an informed, balanced and equitable decision as to the appropriate action to take
- Equality Impact Assessment are completed prior to prosecution, during which consideration is given to any vulnerability and support needs, to ensure that any prosecution if proportionate, necessary and fair.
- Officers of the ASB Enforcement Team will keep up to date with any available Equalities training
- Issues & concerns will be regularly discussed in supervisions & at team meetings, to ensure that equality and fairness are fundamental considerations in any decision relating to enforcement

9. Contribution to strategic outcomes

9.1 Our vision for all residents and businesses in Haringey is summarised in Priority 3 of the Borough Plan 2019 - 2023:

Priority 3 - Our vision is for a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green.

We will work with communities to improve the environment, particularly by reducing anti-social behaviour, making members of the community feel safer in the area where they live or work.

We will work with partners to prevent and reduce more serious crime, by joining up our enforcement teams to monitor and enforce serious incidents of anti-social behaviour. We will help identify and tackle issues more effectively, making members of the community feel safer in the area where they live or work.

Preventing and acting against those, perpetrating ASB increases resident confidence and promotes their health and wellbeing, making them feel safer in their homes. It will also add to the Council's Priority giving children a better start in life by protecting them from the harmful effects of anti-social behaviour and resolving issues of dog nuisance in areas and estates where they live and play.

10. **Statutory Officers comments Finance Officer**

10.1. In March 2020 Cabinet approved a consultation exercise to be carried out on the 5 areas highlighted in paragraph 3.1. This was successfully completed and now Cabinet are being asked to approve the adoption of these proposals.

Most of the signage is already in place however some new signs will be required, which is expected to be in the region of £5K, this cost will be met through existing Service budgets.

Once implemented this will enable the continuation of Fixed Penalty Notices (FPN's) to be issued by ASB Enforcement Officers to ensure compliance.

11. Legal & Governance

11.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report and comments as follows:

11.2 A Public Spaces Protection Order (PSPO) may be made if the Council is satisfied on reasonable grounds that:

- Activities carried on in a public place within the Borough either have had or it is likely that they will have, a detrimental effect on the quality of life of those in the locality;

- It is likely that the detrimental effect will be persistent, and such as to make the activities unreasonable;

- The effect or likely effect is such as to justify the restrictions imposed by the proposed PSPO.

11.3 A PSPO may not have effect for a period of more than 3 years, unless in accordance with section 60 of the Act it is extended before it expires. The current PSPOs must therefore be extended prior to 19th October 2020

11.4 A PSPO can also be varied.

- By increasing or reducing the restricted area;
- By altering or removing a prohibition or requirement included in the order, or adding a new one.
- Or by making a variation that results in the order applying to an area to which it did not previously apply only if:
- Where an order is varied, the order as varied must be published in accordance with regulations made by the Secretary of State.

The proposed extensions and variations are in accordance with the Act and pursuant to sections 72 (3) and (4) of the Act required consultation.

11.5 The legal principles that apply to consultation as confirmed in the Supreme Court case of R (Moseley) v Haringey LBC [2014] UKSC 56 are that:

(i) The consultation has to be at a time when proposals are still at a formative stage.
(ii) The proposer has to give sufficient reasons for any proposal to permit an intelligent consideration and response.
(iii) Adequate time has to be given for consideration and response, and
(iv) The product of consultation had to be conscientiously taken into account in finalising any statutory proposal or reaching a decision.

The consultation was been undertaken in accordance with these principles and the consultation responses must be taken into account in deciding whether to extend and vary the current PSPOs.

11.6 Once the PSPOs are varied and extended they must be publicised in accordance with section 72(4) of the Act. 10.7 As these PSPOs significantly affect the inhabitants of two or more wards, the decision on whether to extend and vary them is a key decision that requires Cabinet approval. If the Cabinet's decision was to be subject to call in it would prevent the extensions from being approved before the 19th October and call in will therefore need to be waived due to the urgency of the implementation of the decision.

12. Equality

12.1 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

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.

12.2 A full Equality Impact Assessment (EQIA) was completed (see Appendix 14) and was informed by the consultation responses (see Appendix 13). Overall, groups with protected characteristics will be positively impacted by the proposal which aims to assist the council in tackling anti-social behaviour and to improve cleanliness.

12.3 The local authority recognises that people who are registered blind, have a mobility issue, those with assistance dogs would struggle to comply with the requirements

of the Dog Control aspects of the PSPOs. Therefore, these groups have been and will continue to be exempt from prosecution if found to be in breach of the dog control provisions of the PSPOs.

12.4 The council also recognises that street drinking is prominent amongst the street homeless population, who statistically more likely to be men, and who often have mental health problems. Extensive support and intervention are initially undertaken to address alcohol and other related issues through referrals to outreach services; providing individuals with the opportunity to engage in support and rehabilitation, prior to any decision to take any enforcement action.

12.5 It is also noted, that while the Alcohol PSPOs covers areas with higher proportions of BAME communities, the location of PSPOs is based on the evidence of need, (i.e. reports to Police with an Alcohol / Licensing Nuisance Code and London Ambulance Service alcohol callouts). The Authority will also be reviewing the potential to expand the PSPO borough wide.

13. Appendices

Appendix (1) Proposed Amended Dog Control PSPO & Borough Ward Map
Appendix (2) Bounds Green Alcohol PSPO
Appendix (3) Bruce Grove Alcohol PSPO
Appendix (4) Harringay Alcohol PSPO
Appendix (5) Noel Park Alcohol PSPO
Appendix (6) Northumberland Park Alcohol PSPO
Appendix (7) St Ann's Alcohol PSPO
Appendix (8) Seven Sisters Alcohol PSPO
Appendix (9) Tottenham Green Alcohol PSPO
Appendix (10) Tottenham Hale Alcohol PSPO
Appendix (11) West Green Alcohol PSPO
Appendix (12) Proposed Amended Woodside Alcohol PSPO
Appendix (13) Consultation Report
Appendix (14) EQIA
Appendix (15) Safer Neighbourhood Policing Team report

Local Government (Access to Information) Act 1985

Background Papers

Anti-Social Crime & Policing Act 2014 - legislation
http://www.legislation.gov.uk/ukpga/2014/12/contents/enacted

Anti-Social Behaviour, Crime and Policing Act 2014, guidance
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/823316/2019-08-05_ASB_Revised_Statutory_Guidance_V2.2.pdf

DEFRA Practitioners Manual on dealing with irresponsible dog ownership

https://www.gov.uk/government/publications/dealing-with-irresponsible-dog-ownership-practitioners-manual

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ANTI-SOCIAL BEAHVIOUR, CRIME & POLICING ACT 2014
S.59-75 PUBLIC SPACE PROTECTION ORDER
LONDON BOROUGH OF HARINGEY DOG CONTROL

1. This order comes into force pursuant to section 75 (3) (a) of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act).

2. This order may be cited as The Public Spaces Protection Order (Haringey Dog Control). It came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

The Public Space Protection Order (PSPO) covers five areas of dog control:

A. Dog fouling of land
B. Dogs on leads
C. Dogs on leads by direction
D. Dogs exclusion
E. Dogs (specified maximum)
F. Appropriate means **to pick up dog faeces**

A. Dog fouling of land

1. This relates to the offence of fouling of land by dogs. The public health implications of dog fouling are well documented.

2. If a dog defecates at any time on land to which this order applies, and the person who is in charge of the dog at that time fails to remove the faeces from the land forthwith, that person shall be guilty of an offence unless:

a. he/she has a reasonable excuse for failing to do so, or
b. the owner, occupier, or other person or authority having control of the land has consented (generally or specifically) to his failing to do so;

3. This Order applies to land described in the Schedule A below, being land in the area of the Council

4. For the purpose of this article:
a. Placing the faeces in a receptacle on the land which is provided for this purpose, or for the disposal of waste, shall be a sufficient removal from the land;
b. Being unaware of the defecation (whether by reason of not being in the vicinity or otherwise), or not having a device for or other suitable means of removing the faeces, shall not be a reasonable excuse for failing to remove the faeces;

Schedule A: Dog fouling of land

Land Designated by Description

1. Any land, which is open to the air, and to which the public are entitled or permitted to have access (with or without payment).
2. Any land which is covered is to be treated as land which is “open to the air” if it is open on at least one side.

B. <u>Dogs on leads</u>

Land Designated by Description

1. Dogs whilst not on a lead and poorly supervised, or startled, have a greater potential to cause road traffic accidents, or to cause injury to pedestrians, dogs and other animals. The restrictions in this Order are designed to facilitate a sharing of our public spaces, whilst recognising that dogs do need to be exercised off lead.

2. A person in charge of a dog shall be guilty of an offence, if at any time, they fail to keep their dog on a lead not longer than 2.0 metres, unless:

a. he/she has a reasonable excuse for failing to do so, or
b. the owner, occupier, or other person, or other authority having control of the land has given consent (generally or specifically);

3. This part of the Order applies to land described in the Schedule B below being land in the area of the Council.

Schedule B: Dogs on leads

Land Designated by Description

1. A highway, carriageway, cycle land, footway or footpath, maintainable at the public expense, or any grass verge managed by the local authority and which is adjacent to the carriageway or footway of a highway, including gutters and adjoining footpaths;
2. clearly specified and signed areas in the boroughs parks
3. all churchyards and graveyards (but not green burial areas), ornamental gardens
4. all car park areas shopping centres and precincts that are:

a. open to the air (which includes land that is covered but open to the air on at least one side) and
b. areas to which the public are entitled or permitted to have access (with or without payment), irrespective of ownership

5. all sports grounds, fields, parks, pitches, which are maintained by the local authority and are not subject to “Dog Exclusion”, but only <u>when in use</u> for officiated sporting matches
6. All parks and open green spaces less than half a hectare
7. On all estates and land managed by Homes for Haringey

C. <u>Dogs on leads by direction</u>

1. In parts of the borough where dogs are permitted off leads, a minority of irresponsible dog owners allow their dogs to cause damage to property, and cause problems for pedestrians, other dog owners and other animals. This part of the Order is designed to enable authorised Council Officers or Police Officers to direct that the owner put their dog on a lead.

2. A person in charge of a dog will be guilty of an offence if at any time, on land to which this Part applies, they fail to comply with a direction given them by an authorised officer of the Council or a police officer to put and keep the dog on a lead of not more than 2 metres in length, unless:

a. he/she has a reasonable excuse for failing to do so, or
b. the owner, occupier, or other person or authority having control of the land, has given consent (generally or specifically)

3. For the purposes of this request an authorised officer of the Council may only direct a person to put and keep a dog on a lead if such restraint is reasonably necessary to prevent either a nuisance, or behaviour by the dog likely to cause annoyance or disturbance to any other person, or the worrying of other animals on designated land to which this order applies.
4. This Part of the Order applies to land described in Schedule C below being land in the area of the Council.

Schedule C: Dogs on leads by direction

Land Designated by Description

1. Any land within the London Borough of Haringey, which is open to the air, and to which the public are entitled or permitted to have access (with or without payment).
2. Any land which is covered is to be treated as land which is “open to the air” if it is open on at least one side.

D. <u>Dogs exclusion</u>

1. There are specific parts of the borough from which dogs should be excluded for their safety and that of pedestrians, and for the public health and aesthetic reasons. This part of the Order states the relatively few places form which dogs will be excluded.

2. A person in charge of a dog will be guilty of an offence if at any time he takes the dog onto, or permits the dog to enter or remain on, any land specified in the Order, unless;

a. he/she has a reasonable excuse for failing to do so, or
b. the owner, occupier or other person or authority having control of the land, has given consent (generally or specifically)

3. This Part of the Order applies to the land described in Schedule D below being land in the area of the Council.

Schedule D: Dogs exclusion

Land Designated by Description

1. children's play areas (which are clearly signed)
2. multi-use games areas (which are clearly signed)
3. sport and recreational facilities, i.e. ball courts, pitches, pool areas (which are enclosed and clearly signed)
4. sensitive areas, or specific horticultural areas within parks (which are enclosed and clearly signed)

E. <u>Dogs (specified maximum)</u>

1. To control the numbers of dogs being walked by an individual. This can cause problems for other dog walkers and other animals where irresponsible dog owners fail to keep their dogs under proper control and where dog foul is not picked up. This part of the Order seeks to place limits on the number of dogs which may be walked together to enable greater control.

2. A person shall be guilty of an offence if they take on to any land in respect of which this Order applies more than the maximum number of dogs specified in point 2 of this Order, unless;

a. they have a reasonable excuse for failing to do so, or
b. the owner, occupier, or other person or authority having control of the land, has given consent (generally or specifically)

3. On land to which this Order applies, the maximum number of dogs which a person may take onto that land is six.

4. This Part of the Order applies to land described in Schedule E below being land in the area of the Council.

Schedule E: Dogs (specified maximum)

Land Designated by Description within the London Borough of Haringey Council

1. Any land within the London Borough of Haringey, which is open to the air, and to which the public are entitled or permitted to have access (with or without payment)
2. Any land which is covered is to be treated as land which is "open to the air" if it is open on at least one side.

F. <u>Means to pick up dog faeces</u>

1. A person in charge of a dog on land to which this Order applies must have with him an appropriate means to pick up dog faeces deposited by that dog unless:
a. s/he has reasonable excuse in failing to do so; or
b. the owner, occupier or other person having control of the land has consented (generally or specifically) to his failing to do so.

2. The obligation is complied with if, after a request from an authorised officer the person in charge of the dog produces an appropriate means to pick up dog faeces.

3. An “appropriate means” is defined as any poop scoop bag, disposal bag or other suitable container for disposal of dog faeces. For the avoidance of any doubt a trouser or coat or other pocket, handbag, rucksack, purse, sports bag are not appropriate means.

4. Authorised officers may approach dog owners and request them to produce appropriate means of removing dog waste and transporting it to a suitable bin. Dog walkers will be expected to demonstrate that they have bags or other means of clearing up, even if the dog hasn’t defecated at that time. If they cannot they may be issued with a fixed penalty notice of £100 or prosecuted and fined £1,000 *(assistance dogs trained by a registered charity where the disability affects the person’s ability to clean up after their dog are exempt).*

SCHEDULE F: Means to pick up dog faeces

Land Designated by Description
1. Any land, which is open to the air, and to which the public are entitled or permitted to have access (with or without payment).

2. Any land which is covered is to be treated as land which is “open to the air” if it is open on at least one side.

General Point

For the purpose of parts, A, B, C and D of this Public Protection Order:

1. Nothing in this Public Space Protection Order applies to a person who:
a. is registered as a blind person in a register compiled under section 29 of the National Assistance Act 1948 or
b. has a disability which affects his/her mobility, manual dexterity, physical coordination, or ability to lift, carry, or otherwise move everyday objects, in respect of a dog trained by a “prescribed charity” and upon which he relies for assistance;
c. each of the following is a “prescribed charity”

i) Dogs for the Disabled (registered charity number 700454)
ii) Support Dogs (registered charity number 1088281)
iii) Canine Partners for Independence (registered charity number 803680)

2. For the purpose of this article, a person who habitually has a dog in his possession shall be taken to be in charge of the dog at any time unless at that time some other person is in charge of the dog.

Offences under the Public Space Protection Order

A person who is guilty of an offence shall on summary conviction be liable to a fine not exceeding level 3 on the standard scale.

A Fixed Penalty Notice of £100.00 will be issued to offenders, which would discharge any liability to conviction for an offence under Section 67(1) of the Act.

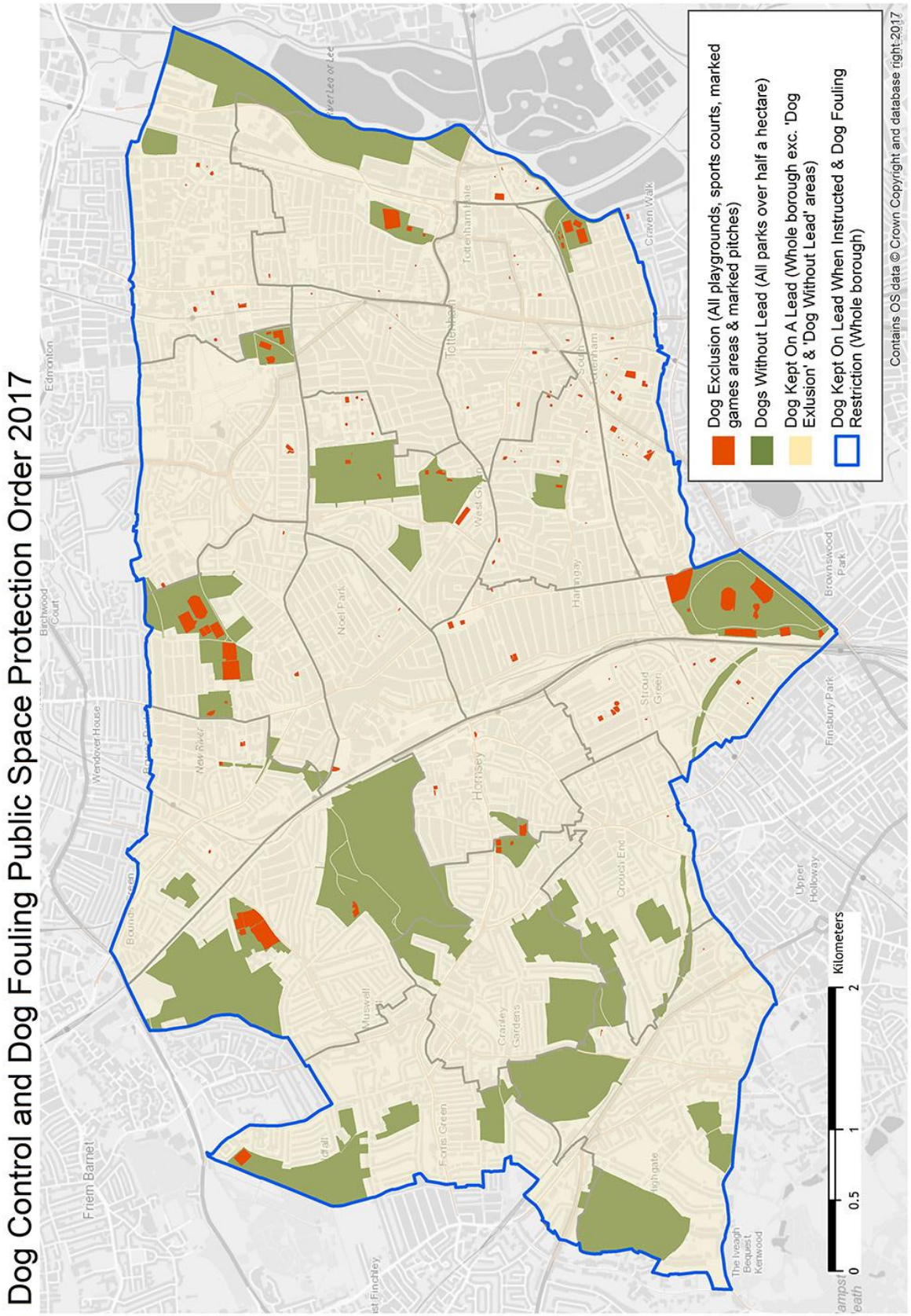
DATED:

The Common Seal of

London Borough of Haringey

Was affixed in the presence of

Authorised Officer


Dog Control and Dog Fouling Public Space Protection Order 2017
Dog Exclusion (All playgrounds, sports courts, marked games areas & marked pitches)
Dogs Without Lead (All parks over half a hectare)
Dog Kept On A Lead (Whole borough exc. 'Dog Exlusion' & 'Dog Without Lead' areas)
Dog Kept On Lead When Instructed & Dog Fouling Restriction (Whole borough)
Kilometers
0
0.5
1
2
Contains OS data © Crown Copyright and database right 2017
Edmonton
Tottenham
Tottenham Hale
Craven Walk
Noel Park
Hornsey
Stroud Green
Crouch End
Finsbury Park
Brownswood Park
Upper Holloway
Friern Barnet
Muswell Hill
Crouch End
Highgate
Kentwood

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APPENDIX 2 -11 – Alcohol Control PSPOs

PUBLIC SPACE PROTECTION ORDER - BOUNDS GREEN WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Bounds Green Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Bounds Green Ward shown outlined on the plan contained in the schedule of this Order (Bounds Green Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Bridge Road
Buckingham Road
Dorset Road
St Michaels Terrace
Terrick Road

Public Parks and Open Spaces managed by Haringey Council

- Park Area Between St Michaels Terrace and Park Avenue

APPENDIX 2 -11 – Alcohol Control PSPOs

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

APPENDIX 2 -11 – Alcohol Control PSPOs

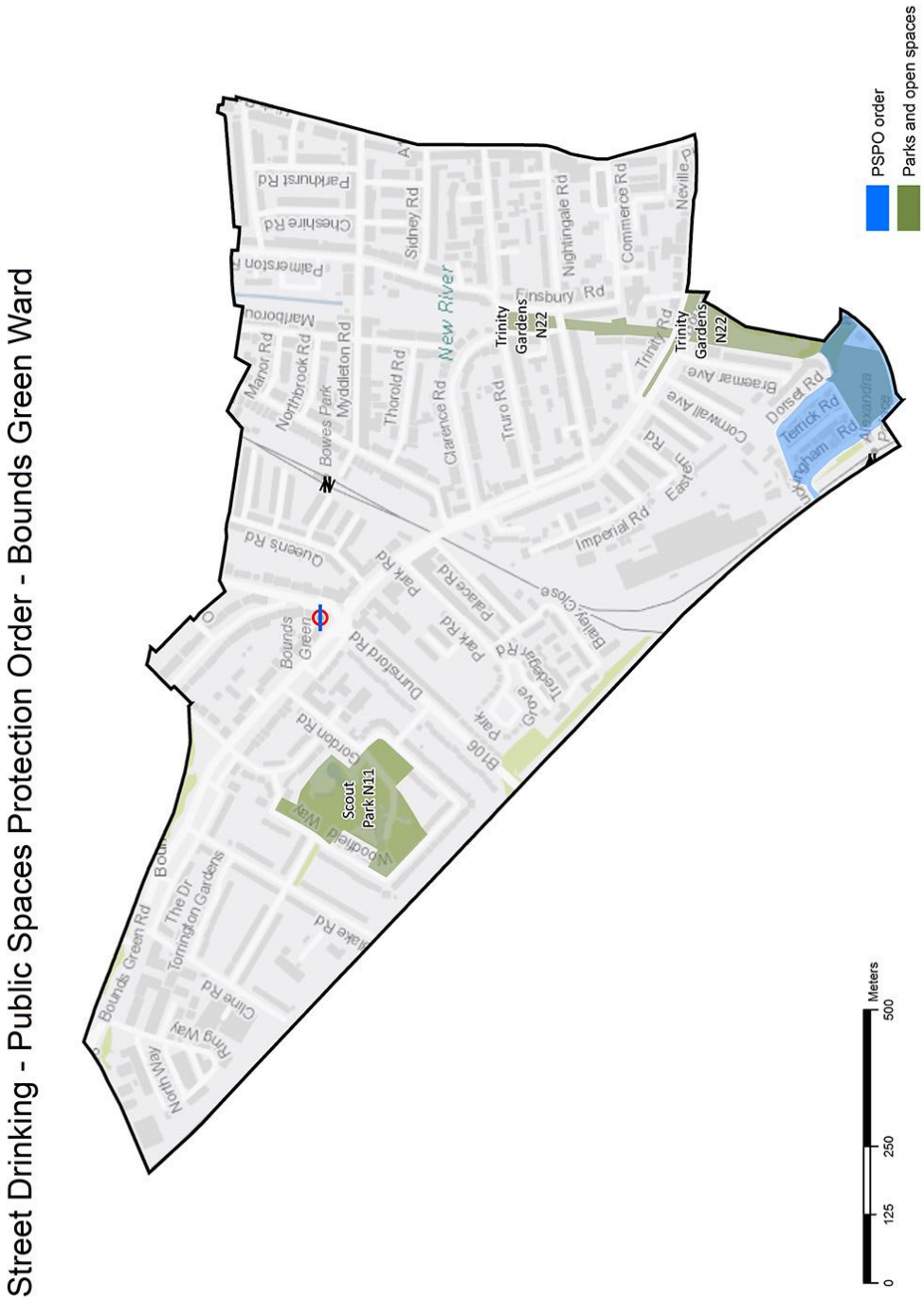
(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – BRUCE GROVE WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Bruce Grove Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Bruce Grove Ward shown outlined on the plan contained in the schedule of this Order (Bruce Grove Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Bruce Grove
Clacton Road
Forster Road
Howfield Place
Lordship Lane
Moorfield Road
Mount Pleasant Road
St Loy's Road

Sperling Road

Public Rights of Way

- Alleyway Beside St. Loy's Road

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

APPENDIX 2 -11 – Alcohol Control PSPOs

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

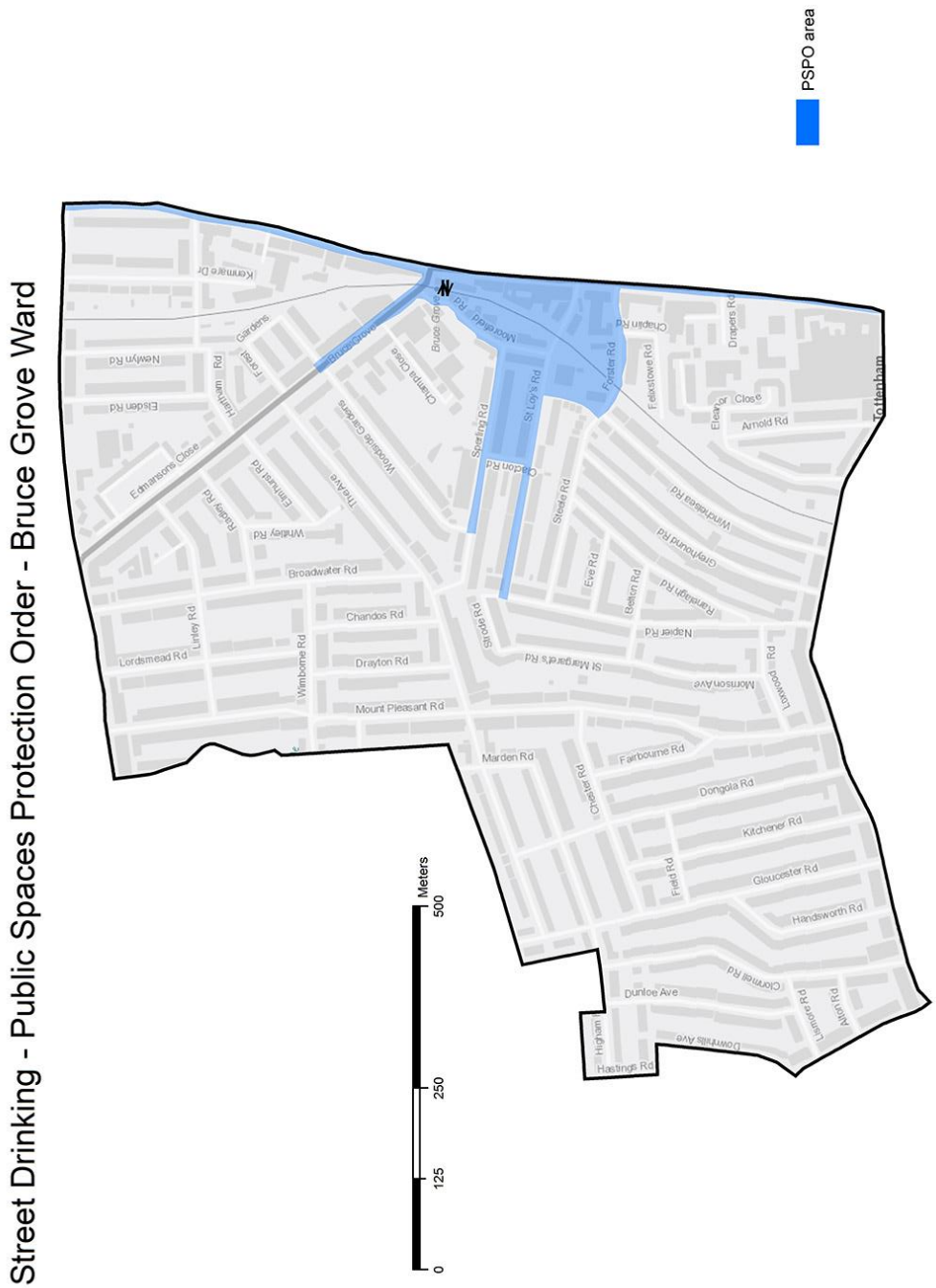
(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY

PUBLIC SPACE PROTECTION ORDER – HARRINGAY WARD

PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Harringay Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Harringay Ward shown outlined on the plan contained in the schedule of this Order (Harringay Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Willoughby Road

Public Rights of Way

- Willoughby Road To Green Lanes

Public Parks and Open Spaces Managed by Haringey Council

- Ducketts Common

APPENDIX 2 -11 – Alcohol Control PSPOs

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

APPENDIX 2 -11 – Alcohol Control PSPOs

(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

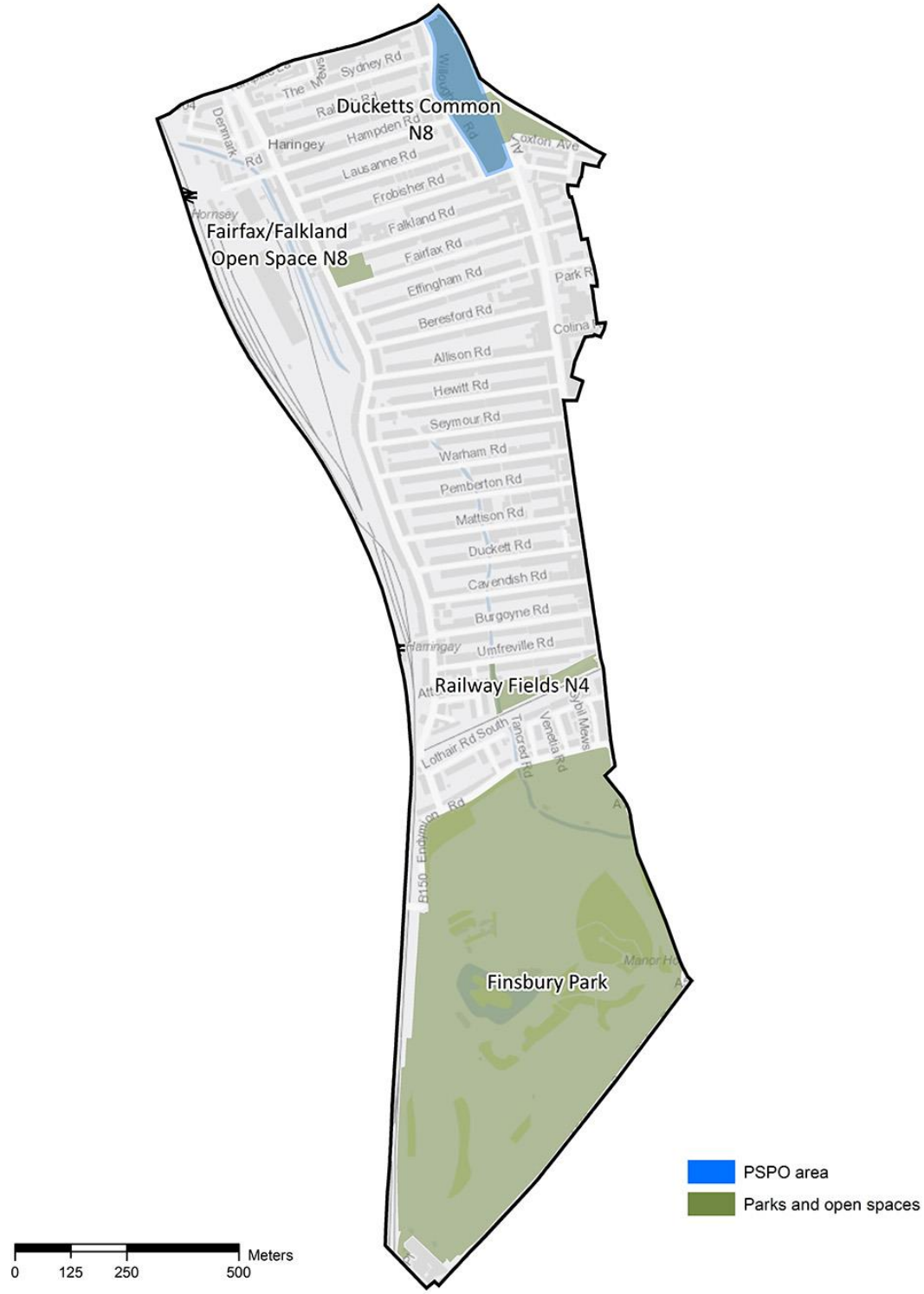
6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs

Street Drinking - Public Spaces Protection Order - Harringay Ward



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – NOEL PARK WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Noel Park Ward Public Spaces Protection Order.**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Noel Park Ward shown outlined on the plan contained in the schedule of this Order (Noel Park Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Albert Mews	Buller Road	Farrant Avenue
Alexandra Road	Burghley Road	Gladstone Avenue
Amber Mews	Bury Road	Gladstone Mews
Arnold Bennett Way	Caxton Road	Hewitt Road
Ashley Crescent	Clarendon Road	High Road
The Avenue	Cobham Road	Hornsey Park Road
Barbara Hucklesbury Close	Coburg Road	Jack Barnett Way
	Coleraine Road	Lakefield Road
Boreham Road	Coombe Road	Lawton Road
Brabant Road	Courcy Road	Lilac Mews
Brampton Park Road	Darwin Road	Lordship Lane
Brook Road	Dovecote Avenue	Lymington Avenue

APPENDIX 2 -11 – Alcohol Control PSPOs

Lyttleton Road	Pelham Road	Waldegrave Road
Malvern Road	Ravenstone Road	Wallis Mews
Mark Road	Redvers Road	Walnut Mews
Maurice Avenue	Russell Avenue	Wellesley Road
Mayes Road	Salisbury Road	Westbeech Road
Meads Road	The Sandlings	Westbury Avenue
Morley Avenue	Silsoe road	Western Road
Moselle Avenue	Tower Terrace	Whymark Avenue
Noel Park Road	Turnpike Lane	Willingdon Road
Park Ridings	Vernon Road	
Parkland Road	Vincent Road	

Public Rights of Way

- Ashley Crescent To Lymington Avenue
- Willingdon Road To Russell Avenue
- Willoughby Road To Green Lanes
- Station Road To Western Road
- Footpath Between Whymark Avenue To Cobham Road
- Westbury Avenue To Whymark Avenue

Public Parks and Open Spaces Managed by Haringey Council

- Allotment Gardens In Lordship Lane,
- Saftsbury Road And Moselle Avenue
- Recreational Ground Near Maurice Avenue, Gardner Court,
- Russell Avenue And Willingdon Road
- Noel Park

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

APPENDIX 2 -11 – Alcohol Control PSPOs

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may

apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:

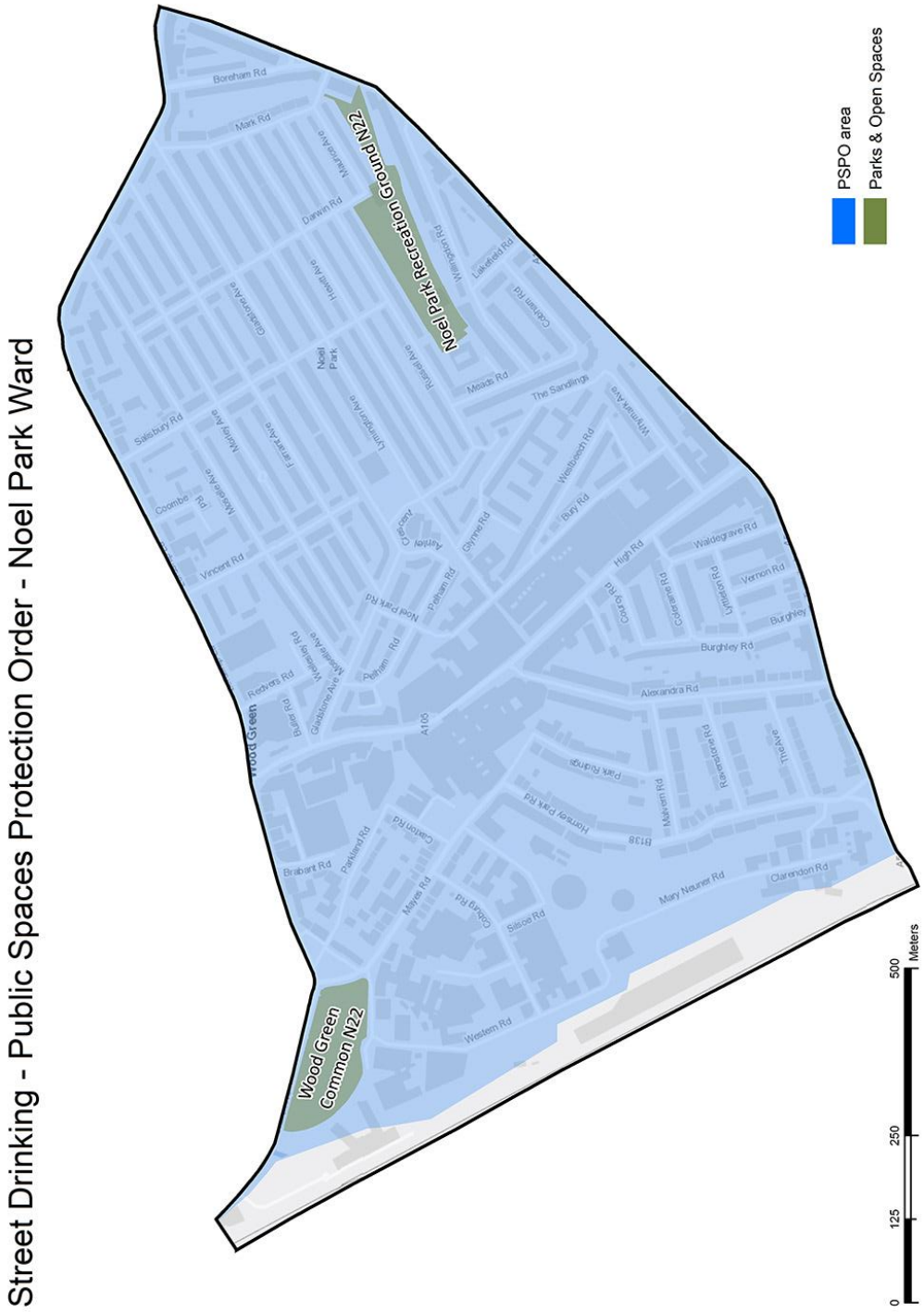
The Common Seal of

London Borough of Haringey

Was affixed in the presence of

Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – NORTHUMBERLAND PARK WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Northumberland Park Ward Public Spaces Protection Order.**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Northumberland Park Ward shown outlined on the plan contained in the schedule of this Order (Northumberland Park Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Almond Road	Brereton Road	Commercial Road
Altair Close	Bromley Road	Commonwealth Road
Anglia Close	Bruce Castle Road	Coniston Road
Argyle Passage	Brunswick Square	Cooperage Close
Argyle Road	Cartmel Close	Denmark Street
Asplins Road	Castleford Close	Durban Road
Baronet Road	Cedar Road	Eastwood Close
Beaufoy Road	Cemetery Road	Farningham Road
Bennetts Close	Halgrove Road	Foyle Road
Bill Nicholson Way	Chapel Stones	Garman Road
Birkbeck Road	Church Road	Gillham Terrace
Blaydon Close	College Park Road	Grange Road
Brantwood Road	College Road	

APPENDIX 2 -11 – Alcohol Control PSPOs

Grasmere Road
Gretton Road
Haynes Close
Headcorn Road
Hebden Terrace
Heybourne Road
High Road N17
Ingleton Road
James Place
King Street
Kings Road
Lancaster Close
Leeside Road
The Lindales
Love Lane
Manor Road
Marigold Road
Morpeth Walk
Moselle Place
Moselle Street
The Moselle
New Road
Northumberland Grove
Northumberland Park
Nursery Court
Nursery Street
Offord Close
Orchard Place
Park Avenue Road
Park Lane
Park Lane Close
Paxton Road
Penshurst Road
Pretoria Road
Roebuck Close
Romney Close
Rothbury Walk
Ruskin Road
Scotswood Walk
Sedge Road
Somerford Grove
St. Paul's Road
Sutherland Road
Tariff Road
Tebworth Road
Tenterden Road
Thornley Close
Trulock Road
Vicarage Road
Waggon Lane
Waverley Road
West Road
Whitehall Street
William Street
Willoughby Grove
Willoughby Lane
Willoughby Park Road
Worcester Avenue

Commercial Road (From The Junction of Pretoria Road to Meridian Walk)

Grange Road – Nos. 27-51 And 28-44

Ingleton Road Nos. 2-38 And 1-37

Lordship Lane Nos. 2-26 And 21 To 47

Pretoria Road Nos. 1-87

Queen Street Nos. 1-29 And (From Corner of White Hart Lane to The Three Compasses Public House)

White Hart Lane Nos. 2-144 (From The Health Care Centre to No. 220)

Public Rights of Way

- Beaufoy Road To Penshurst Road N17
- Bennetts Close To Roebuck Close N17
- Nursery Street To Church Road N17
- Off Queens Street N17
- Ruskin Road To Kings Road N17
- Charles House N17 (Access Road)
- Ermine House N17 (Access Road)
- Moselle House N17 (Access Road)
- West Road To Willoughby Lane N17

APPENDIX 2 -11 – Alcohol Control PSPOs

Public Parks and Open Spaces Managed by Haringey Council

- Green Chain – River Lee
- Lee Valley Regional Park
- Play Area Near Gretton Road, N17
- Play Ground Near Viaduct, Church Road, St James Place And Kings Road, N17
- The Green, By Town Hall Approach and High Road, N17

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

APPENDIX 2 -11 – Alcohol Control PSPOs

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

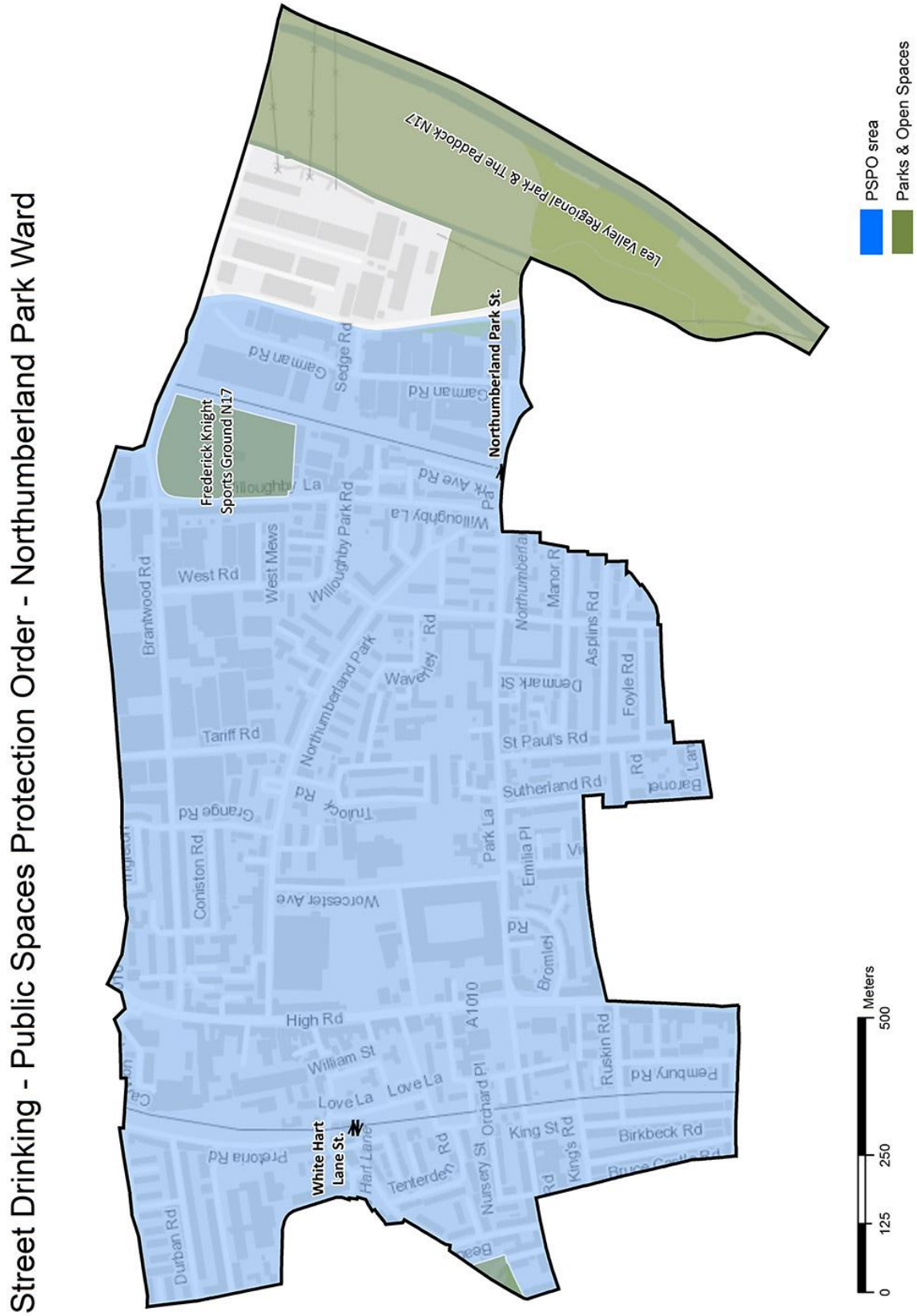
(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – ST ANN'S WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **St Ann's Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the St Ann's Ward shown outlined on the plan contained in the schedule of this Order (St Ann's Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Avenue Road
Braemar Road
Cissbury Road
Culvert Road
Durnford Street
Edgecot Grove
Gourley Place
Gourley Street
Grove Road

Kerswell Road
Lydford Road
Newsam Avenue
Oulton Road
Roslyn Road
Russel Road
South Grove
Victoria Crescent

Public Rights of Way

APPENDIX 2 -11 – Alcohol Control PSPOs

- Alleyway Between Victoria Crescent And Culvert Road

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

APPENDIX 2 -11 – Alcohol Control PSPOs

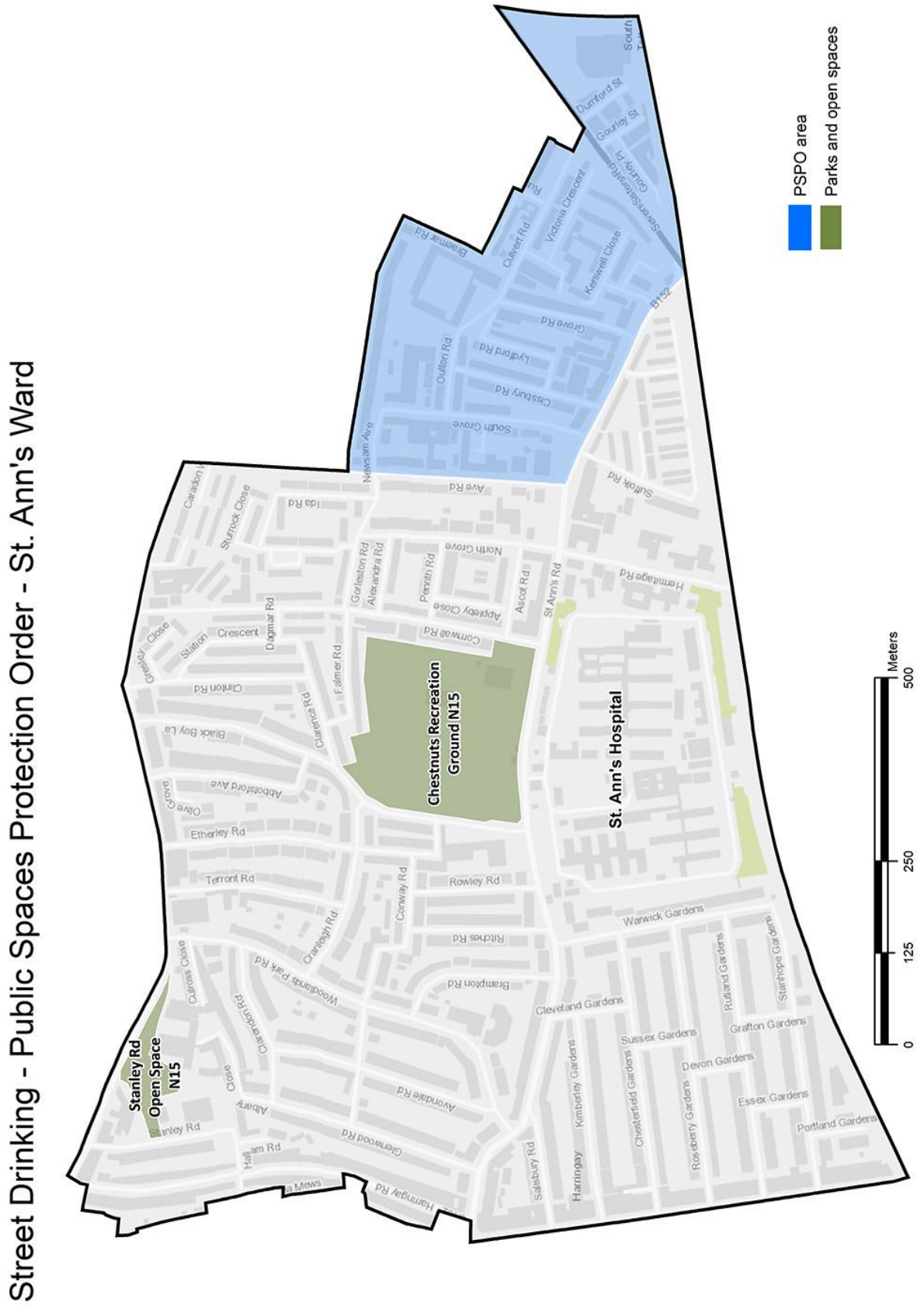
6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:

The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – SEVEN SISTERS WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Seven Sisters Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Seven Sisters Ward shown outlined on the plan contained in the schedule of this Order (Seven Sisters Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Albert Road	Craven Park Road	Frinton Road
Allan Barclay Close	Crowland Road	Gladesmore Road
Ashfield Road	Daleview Road	Grovelands Road
Barry Avenue	Eade Road	Hermitage Road
Beechfield Road	Eastbourne Road	Heysham Road
Berkeley Road	Elm Park Avenue	Hillside Road
Bushey Road	Ermine Road	Holmdale Terrace
Adoxton Avenue	Fairview Road	Howard Road
Candler Street	Ferndale Road	Langford Close
Castlewood Road	Finsbury Park Avenue	Latimer Road
Chisley Road	Fladbury Road	Leabank View
Clifton Gardens	Franklin Street	Leadale Road

APPENDIX 2 -11 – Alcohol Control PSPOs

Lealand Road
Lemsford Close
Linkway
Lockmead Road
Manchester Road
Moreton Close
Moreton Road
Netherton Road
Norfolk Avenue
Oakdale Road
Olinda Road
Osman Close
Overbury Road
Paignton Road
Perry Court
Plevna Crescent
Pulford Road
Remington Road
Richmond Road
Riverside Road
Rostrevor Avenue
Seven Sisters Road
Sherboro Road
St. John's Road
Surrey Gardens
Tavistock Road
Templeton Road
Tewkesbury Close
Tewkesbury Road
Thorpe Road
Tiverton Road
Urban Mews
Vale Grove
Vale Road
Vale Terrace
Vartry Road
Wargrave Avenue
Wellington Avenue
Westcott Close
Williamson Road
Wiltshire Gardens

Public Rights of Way

- Seven Sisters Road To Tewkesbury Road N15
- Accessway Serving 1-28, 31-61 Templeton Road N15

Public Parks and Open Spaces Managed by Haringey Council

- Tottenham Railsides
- Harringay Stadium Slopes
- Tottenham Railside
- Markfield Recreation Ground
- Manchester Gardens
- Paignton Park
- Seven Sisters Gardens

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been

consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

APPENDIX 2 -11 – Alcohol Control PSPOs

DATED:

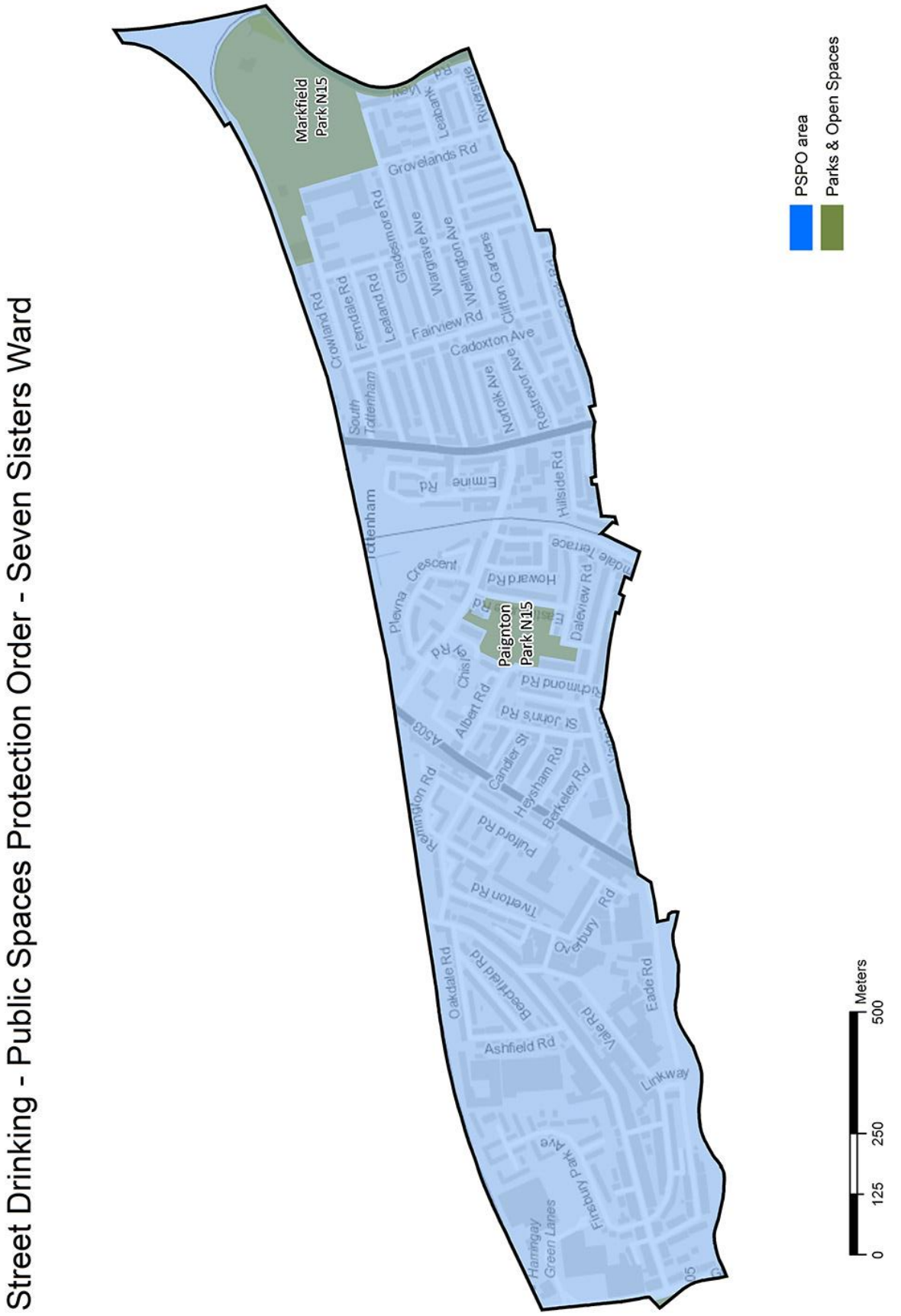
The Common Seal of

London Borough of Haringey

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Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – TOTTENHAM GREEN WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Tottenham Green Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Tottenham Green Ward shown outlined on the plan contained in the schedule of this Order (Tottenham Green Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Antill Road	Clyde Road	Grove Park Road
Ashby Road	Colless Road	Hale Gardens
Ashmount Road	Collingwood Road	The Hale
Beaconsfield Road	Colsterworth Road	Hanover Road
Bedford Road	Constable Crescent	Harold Road
Bernard Road	Copperfield Drive	Herbert Road
Birstall Road	Cunningham Road	High Cross Road
Bourn Avenue	Dorset Road	High Road N15
Braemar Road	Earlsmead Road	High Road N17
Broad Lane	Elizabeth Place	Houghton Road
Brunel Walk	Elizabeth Road	Jansons Road
Brunswick Road	Elmar Road	Kirkton Road
Cape Road	Fountayne Road	Lawrence Close
Clyde Circus	Greenfield Road	Lawrence Road

APPENDIX 2 -11 – Alcohol Control PSPOs

Lomond Close
Loobert Road
Mansfield Avenue
Markfield Road
Montague Road
Nelson Road
Newton Road
Norman Road
Page Green Road
Page Green Terrace
Pelham Road
Pembroke Road
Philip Lane
Portland Road
Rangemoor Road
Russell Road
Saltram Close
Seaford Road
Shanklin Road
Southey Road
Spondon Road,
Springfield Road
Spur Road
Stainby Road
Stamford Close
Stamford Road
Stonebridge Road
Suffield Road
Summerhill Road
Talbot Close
Talbot Road
Tenby Close
Tottenham Green East
Town Hall Approach Road
Townsend Road
Turner Avenue
Tynemouth Road
Victoria Road
Wakefield Road
Walton Road
Watts Close
Westerfield Road
West Green Road

Public Rights of Way

- Berners Road To Norman Road N15
- Hale Gardens To Broad Lane N15/N17
- Hale Gardens To Montague Road N15/N17
- High Road Nos. 227-639, 212-636, 639-881 And 636-864
- High Road Service Road To Nos. 227-249 Part Of Gla Road N15
- Town Hall Approach Road To High Road N15
- Stainby Road To Montague Road N15
- Southey Road To Roslyn Road N15
- West Green Road To Turner Avenue N15
- Accessway Serving 1-23, 25-51 Turner Avenue N15

Public Parks and Open Spaces Managed by Haringey Council

- Tottenham Railsides
- Ecological Corridor
- West Green Memorial Garden
- Tottenham Green
- Page Green Common
- Tottenham Green East
- Tottenham Green N15

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

APPENDIX 2 -11 – Alcohol Control PSPOs

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the

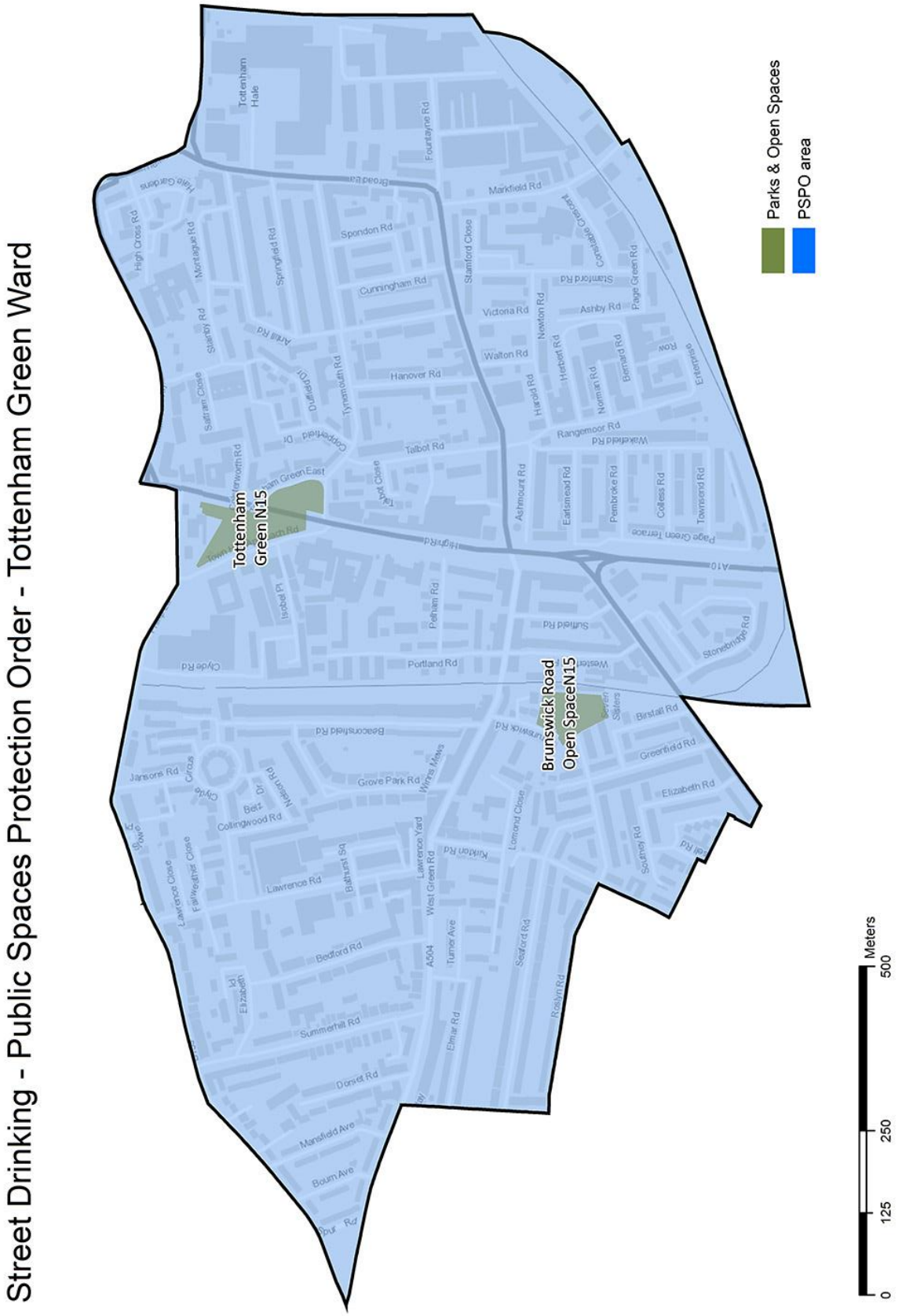
grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:

The Common Seal of
London Borough of Haringey
Was affixed in the presence of

Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – TOTTENHAM HALE WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Tottenham Hale Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Tottenham Hale Ward shown outlined on the plan contained in the schedule of this Order (Tottenham Hale Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

High Road
Stoneleigh Road
Brook Street
Albert Place
Chestnut Road
Scotland Green

APPENDIX 2 -11 – Alcohol Control PSPOs

Public Rights of Way

- Stoneleigh Road Car Park N17
- Alleyway Between High Road And Stoneleigh Road

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

APPENDIX 2 -11 – Alcohol Control PSPOs

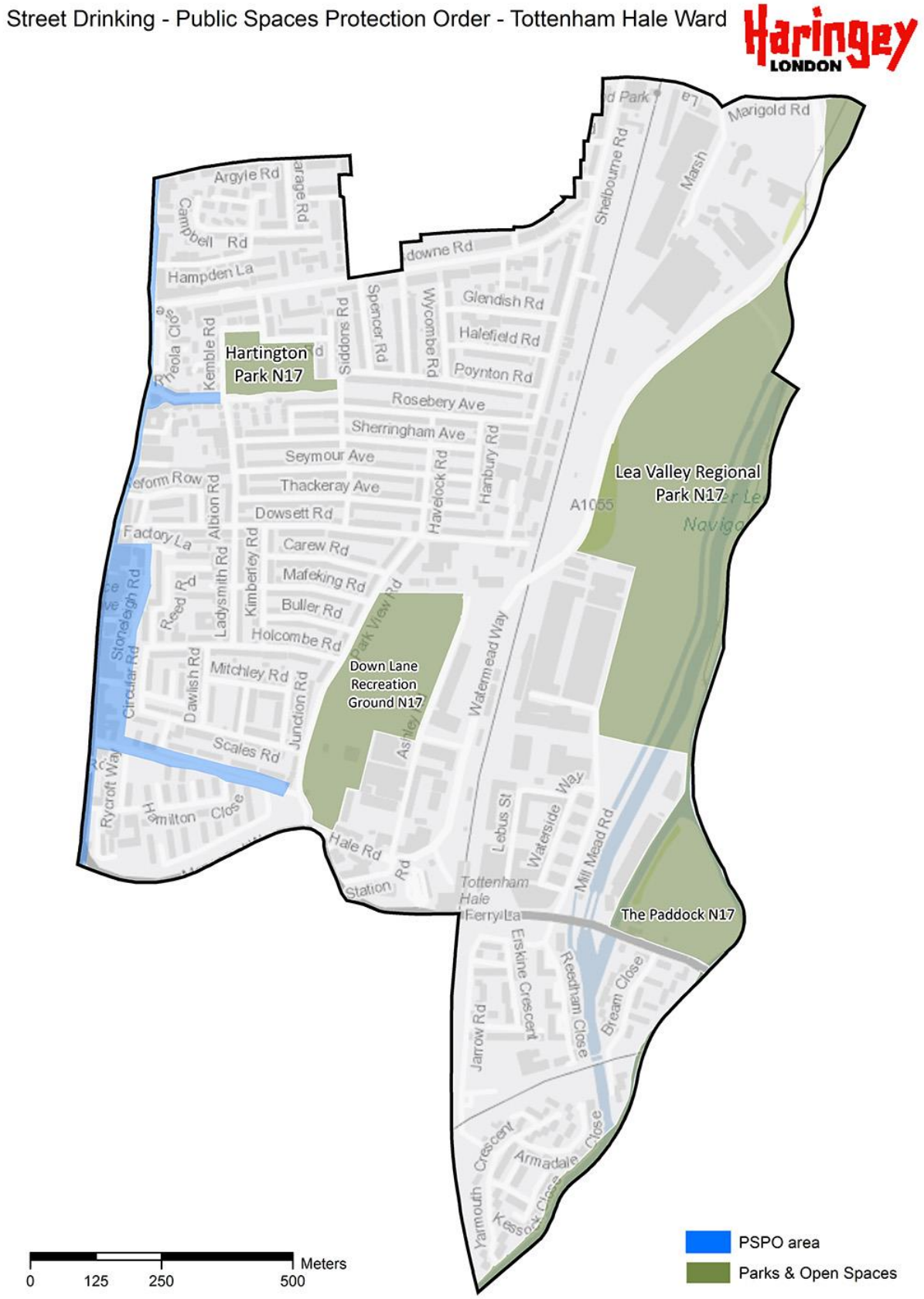
(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 2 -11 – Alcohol Control PSPOs

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – WEST GREEN WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **West Green Ward Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the West Green Ward shown outlined on the plan contained in the schedule of this Order (West Green Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Adams Road
Belmont Road
Downhills Park Road
Downhills Way
Freedom Road
Gloucester Road
Griffin Road
Keston Road
Langham Road

APPENDIX 2 -11 – Alcohol Control PSPOs

Lido Square

Moira Close

Somerset Close

Vincent Road

West Green Road

Willan Road

Public Rights of Way

- Footpath Connecting Two Footpaths From Frome Road and Mannock Road

Public Parks and Open Spaces Managed by Haringey Council

- Downhills Park

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a

person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

(3) A Police Constable or authorise person who imposes a requirement under subsection (2) must tell the person that failing without reasonable excuse to comply with the requirement is an offence.

(4) A requirement imposed by an authorised person under subsection (2) is not valid if the person - (a) is asked by person to show evidence of his or her authorisation, and (b) fails to do so.

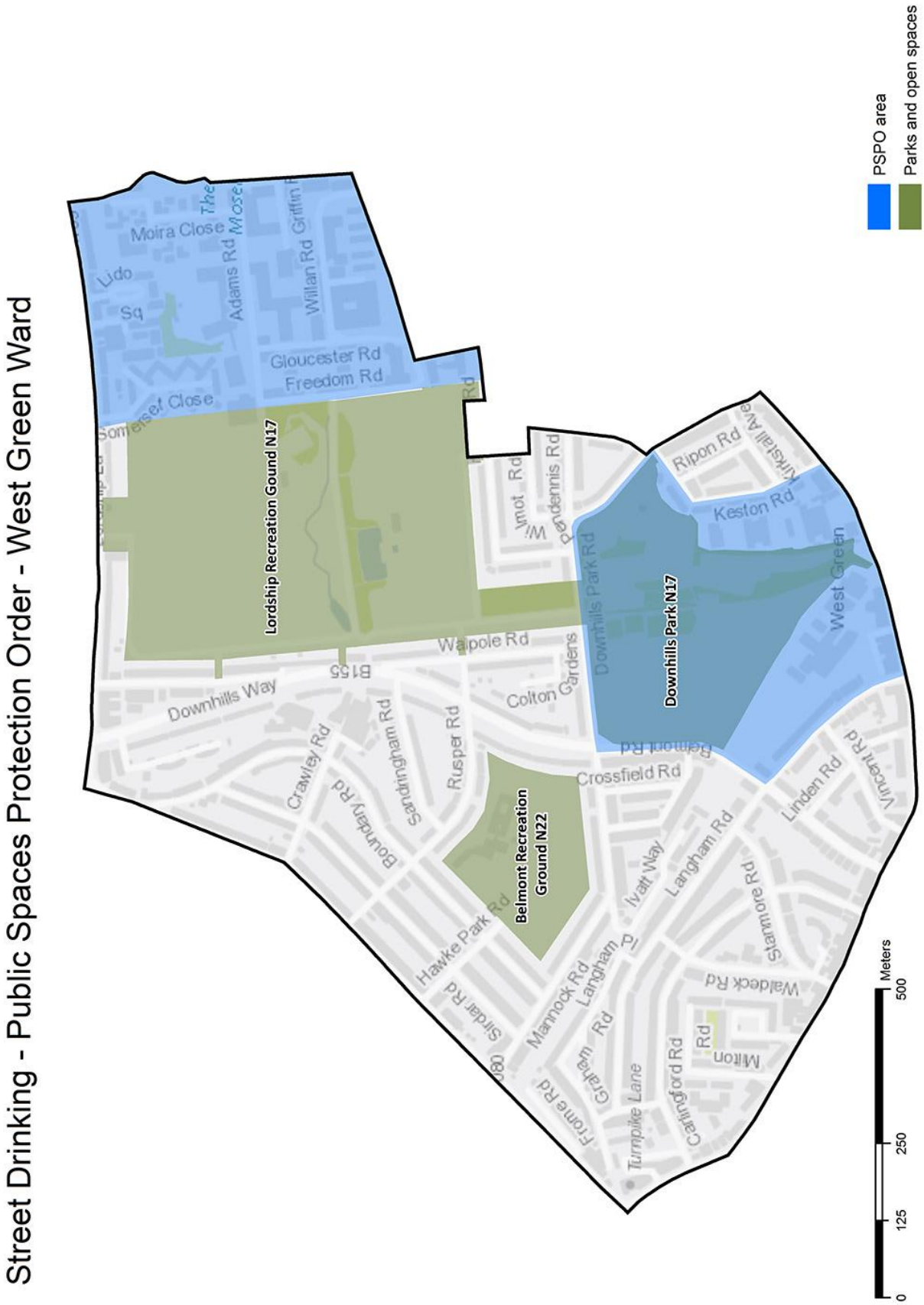
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6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

APPENDIX 2 -11 – Alcohol Control PSPOs



APPENDIX 12 – Amended Woodside Ward Alcohol Control PSPO

LONDON BOROUGH OF HARINGEY
PUBLIC SPACE PROTECTION ORDER – WOODSIDE WARD
PUBLIC CONSUMPTION OF ALCOHOL OF INTOXICATING LIQUOR

1. This Order may be cited as the **Woodside** W**ard Public Spaces Protection Order**

2. This order comes into force pursuant to section 75 (3) (a) of the of the Anti-social Behaviour, Crime and Policing Act 2014 (the Act), the Council being satisfied on reasonable grounds that the activities set out in paragraph 5, in the location described in paragraph 4 of this Order and marked on the plan contained in the schedule to this Order have had or are likely to have a detrimental effect on the quality of life of those in the locality, or it is likely that activities will be carried out within that area and have such an effect. The Council is also satisfied that the effect, or likely effect, of the activities is, or is likely to be, of a persistent or continuing nature and that these activities are unreasonable and justify the restrictions imposed by this Order and that it is in all circumstances expedient to make this Order for the purpose of reducing anti-social behaviour in a public place.

3. This Order came into force on the 20th October 2017 for three years and has been extended for a further three years. It will expire on 18th October 2023.

4. This Order applies to the public places being those parts of the Woodside Ward shown outlined on the plan contained in the schedule of this Order (Woodside Ward Public Space Protection Order).

SCHEDULE OF RESTRICTED ROADS

Berners Road
Gathorne Road
Hardy Passage
High Road, N22
Lordship Lane
Ranelagh Road
St Albans Crescent
Selborne Road
Stuart Crescent

Watsons Road

White Hart Lane, N22

Public Parks and Open Spaces Managed by Haringey Council

- Wood Green Common
- Wood Green Common Playground
- Stuart Crescent Park / Peace Park
- Civic Centre Gardens And Car Park
- Chapmans Green

5. The activities described below are hereby prohibited as from the date of this Order.

(a) Consuming intoxicating liquor in a public place and acting in a manner that is causing or is likely to cause alarm harassment or distress

(b) Being in possession of an open vessel(s) of intoxicating liquor in a public place

S63 Consumption of alcohol in breach of prohibition in this Order

(1) This section applies where a Police Constable or Police Community Support Officer or an authorised person reasonably believes that a person (a) is or has been consuming alcohol in breach of a prohibition in a Public Spaces Protection Order, or (b) intends to consume alcohol in circumstances in which doing so would be a breach of such a prohibition. In this section "authorised person" means a person authorised for the purpose of this section by the local authority that made the Public Space Protection Order (or authorised by virtue of section 69(1).

(2) The Police Constable or authorised person may require a person – (a) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol (b) to surrender anything in a person's possession which is, or which the Police Constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

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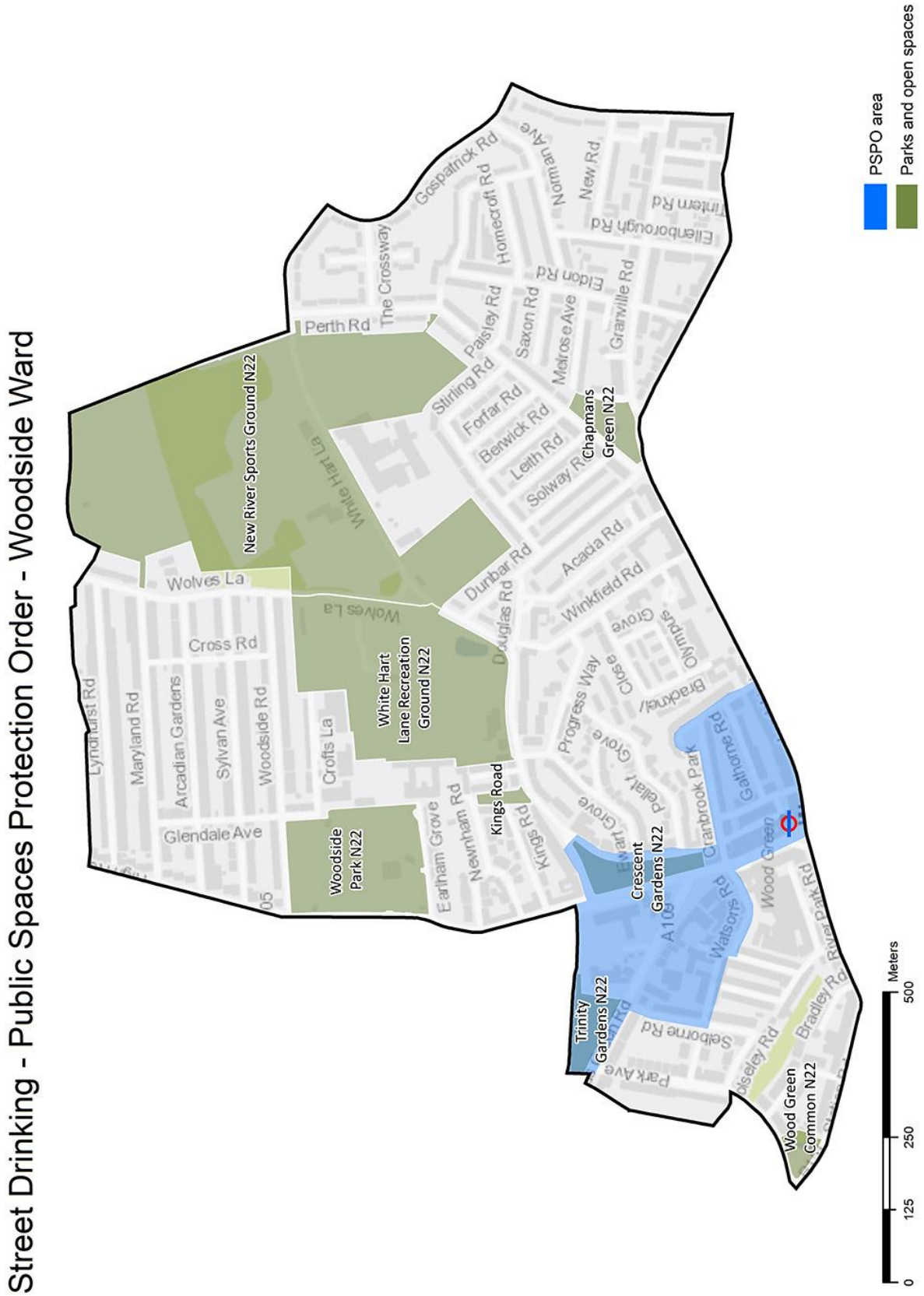
(5) A Police Constable or authorised person may dispose of anything surrendered under subsection (2)(b) in whatever way he or she thinks appropriate.

6. A person who fails without reasonable excuse to comply with a requirement imposed on him or her under subsection (2) (a) or (b) commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500), or a fixed penalty notice of £100.00.

7. An interested person may apply to the High Court to question the validity of this Order and an interested person means an individual who lives in the restricted area or who regularly works or visits that area. Any such interested person may apply to the High court within six weeks from the date on which this Order was made on the grounds that the Council did not have the power to make the Order or to include particular prohibitions or requirements imposed by the Order or that a requirement of the Act was not complied with in relation to the Order.

DATED:
The Common Seal of
London Borough of Haringey
Was affixed in the presence of
Authorised Officer

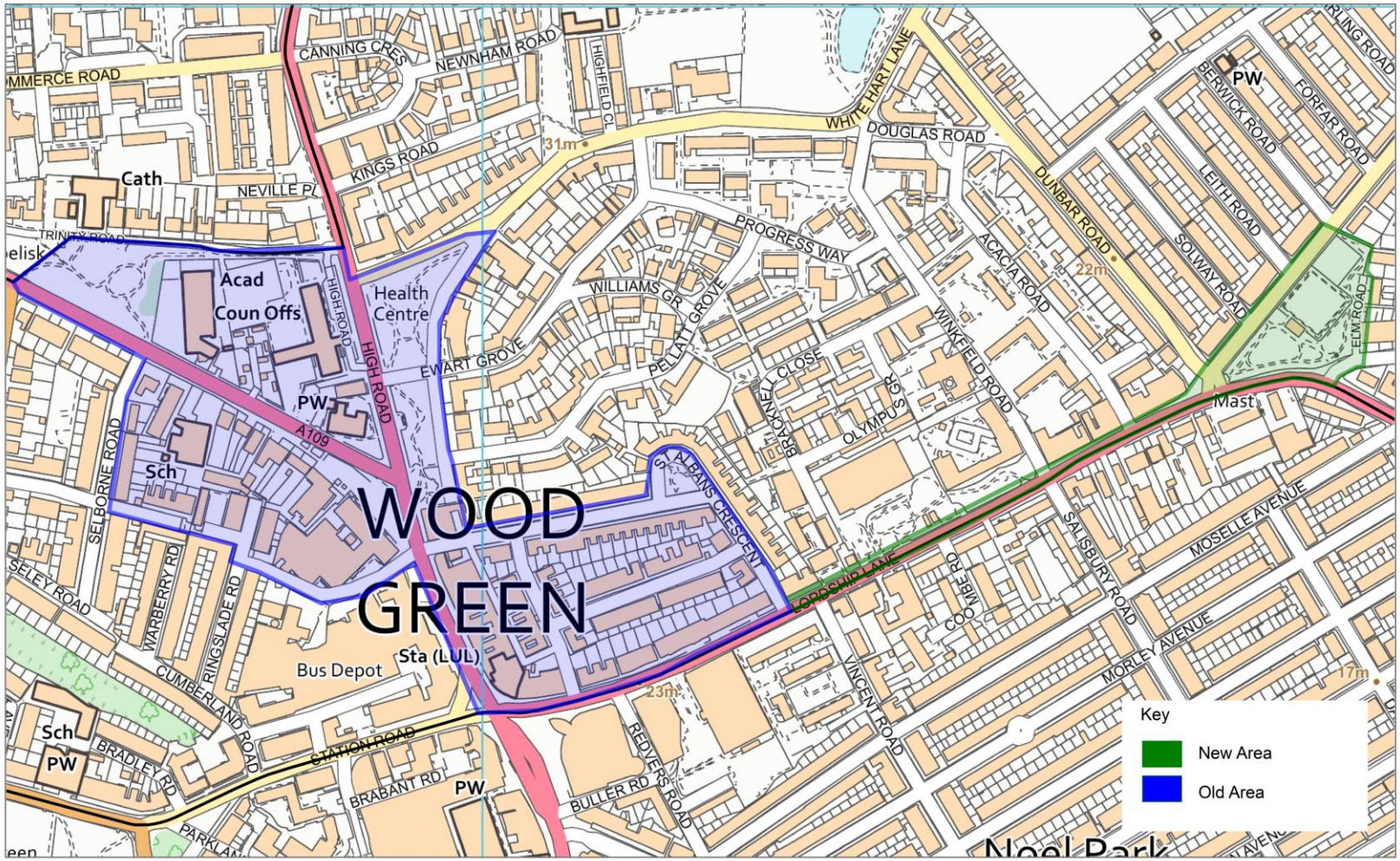
APPENDIX 12 – Amended Woodside Ward Alcohol Control PSPO



Previous Boundary area 21017 -2020

Amended Boundary area – 2020 - 2023

Street Drinking - Map of the PSPO Boundary
Woodside Ward



Produced by the E&N Systems Team
Map updated on 17/09/2020

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APPENDIX 13: Consultation on the Alcohol and Dog Control PSPOs for the London Borough of Haringey

Results Report

Purpose

A public consultation was undertaken following approval from a full Cabinet meeting of 10 March 2020, in accordance with section 72 of the Antisocial Behaviour, Crime and Policing Act 2014. The consultation sought to obtain public views, on the following proposals: -

- To extend the 11 Alcohol PSPOs for a further three years
- To extend the boundary of the Woodside Ward Alcohol PSPO
- To extend the Borough wide Dog Control PSPO for a further three years
- To add a new requirement to the Dog Control PSPO which would require "a person in charge of a dog on land to which the Order applies to produce on request a means or device to pick up dog faeces deposited by that dog."

Executive Summary

There were 2610 responses to the consultation and 40 additional emails and letters. This report provides detailed analysis of the consultation results. An analysis of additional 1029 other comments within the surveys is summarised in Table 3 at pages 15 to 24 of this report. Additional emails, calls and letters are itemised in the Table 4 at pages 25 to 35 of this report.

Of those respondents who told us the capacity in which they were responding to the survey questionnaire, 98% were residents of Haringey.

The headline results of the consultation include:

- 854 people living, working or visiting the one of the 11 Alcohol control PSPO wards responded to the consultation survey 83.7% agreed that we should have a PSPO to deal with street drinking; 82.4% agreed that the PSPO affecting the area they live, work or visit should be extended for a further 3 years?

- Just over half the respondents to the alcohol control survey agreed with the proposal that the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park (57%); although not particularly high it is noted that 34.3% of respondents had no opinion in respect of this point.

- 98.9% of respondents to the Dog Control PSPO survey were Haringey residents and an overwhelming majority were not dog owners

- An overwhelming majority of respondents agreed that the following conditions of the Dog Control PSPO should remain in place: -
    - Dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access (97%)

- Dogs are excluded from fenced play areas set aside for children and marked sports pitches when in use. (92.3%)
- Dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare (89.6%)
- Dog owners to put their dog on a lead when directed to do so by an authorised officer, when on any land to which the public have access and where a dog is considered to be out of control. (94.6%)

- 65.7% of respondents agreed that the condition that one person is permitted to walk a maximum of six dogs should remain in place. 25% of respondents supported this condition being varied with the vast majority supporting that the maximum number be reduced to 4 or less.

- 95.2% of respondents agreed with the proposed new requirement for a person in charge of a dog to carry a means or device to pick up dog faeces, when exercising their dog(s)

Background

1.0 On 20th October 2017 Haringey replaced its 11 Designated Public Places Orders (also known as Alcohol Control Zones) and Dog Control Orders, with Public Spaces Protection Orders, with requirements and prohibition mirroring the previous Alcohol Control Zones and Dog Control Orders. A PSPO remains in place for three years unless discharged by the Local Authority. The existing PSPOs enacted on the 20th October 2017, relating to alcohol and dog control expire on the 19th October 2020.

2.0 The purpose of this consultation was to gather views on a proposal to extend the current Alcohol and Dog Control PSPOs for a further three years, vary the Woodside Alcohol Control PSPO and add a new requirement to the Dog Control Order.

3.0 The consultation sought the views of those who are or may be affected by the extension and/or variation of these PSPOs and other stakeholders. This included those in the locality such as local residents, visitors or those who work or study in the area, community groups, local businesses, key partners, such as parks services/associations, animal charities and vets, and statutory consultees. The consultation sought to specifically obtain the views of dog owners about the proposed new requirement of the Dog Control Order, which would require dog owners to carry bags or a means to pick up dog mess.

4.0 The consultation encouraged respondents to make comments with regard to how they feel about the PSPOs, any proposed variations and any suggestions for further variations.

Methodology

1.0 The Consultation process began on the 7 July 2020. And continued for 6 weeks.

2.0 Details of the consultation were available online and an online questionnaire were activated. A copy of the Questionnaires is attached at pages 46 to 59.

3.0 A consultation Flyer publicising the consultation and methods to respond was produced. A copy of the Flyer is attached at page 60 of this report.

4.0 A Consultation Letter was delivered to 119,000 households in the borough. A copy of the Consultation letter distributed is attached at page 61 of this report.

5.0 The consultation flyer was: -

- Distributed on the street in key high footfall areas: Wood Green High Road, Wood green tube station, Seven Sisters Road.
- Displayed in parks and area to be extend in Woodside Ward
- Delivered to vets in east, west and north patches

6.0 A Consultation Letter/flyer was provided (by hand or via post/websites) to: -

- Dog walker groups/clubs within the borough
- The Kennel Club
- RSPCA and Dogs Trust
- Wood Green Animal Shelter

7.0 A Consultation letter was: -

- Delivered to all business in High Roads and Main Road
- Sent out to landowners and social landlords within the borough
- Sent out to all licensed premises. A copy of this consultation letter is attached at page 62 of this report

8.0 All councillors across the borough were notified.

9.0 To ensure the consultation gave equal opportunity to all those who might want to submit responses in different ways and different formats, the online survey was also made available as a paper copy and responses and views could also be made via email, direct to the lead officer by email Allison.pibworth@haringey.gov.uk

10.0 The consultation was open to all and respondents were asked to specify: -

- Which of the 11 alcohol PSPO affected wards they live, work or visited
- If they have been affected by any specific alcohol related Anti-social behaviour
- If they are a Haringey resident
- If they are, have been or plan to be a dog owner

Thus, assisting the Council to better understand any impact, variations in impact and opinion.

Data Analysis

1.0 The Consultation comprised of three separate surveys; respondent could complete all surveys or just the one's most relevant to them. In total, the Council received 2610 responses to this consultation. 2607 of these were completed

online and a further 3 were completed on paper. The breakdown of responses per survey is below

Alcohol Control PSPO Survey	854
Dog Control PSPO Survey	1142
Dog Control PSPO – New requirement	614

1.1 A demographic profile of respondents can be found in Tables 5 to 6 in pages 36 to 45 of this report.

1.2 The Council also received emails and letters from a further 40 Respondents; 34 Borough residents, 2 councillors and one from someone who works in the borough. The summary and key points of these contacts are itemised in Table 4 which can be found at pages 25 to 35 of this report.

2.0 Alcohol Control Order Survey Results

2.1 The consultation process wanted to specifically identify people living, visiting and working within the affected areas of the alcohol control PSPO to be extended, as they would be expected to be most affected by the extension of the Order. To ensure their views were fully represented respondents to the questionnaire were asked to identify which of the 11 PSPO wards they lived, visited or worked within.

Q1. There are 11 PSPOs in the borough governing the control of alcohol. Which ward do you live work or visit?

WARD	Number of responses
Bounds Green	100
Bruce Grove	65
Harringay	308
Noel Park (PSPO covers the whole ward)	57
Northumberland Park (PSPO covers the whole ward)	29
St Ann's	36
Seven Sisters (PSPO covers the whole ward)	47
Tottenham Green (PSPO covers the whole ward)	30
Tottenham Hale	9
West Green Road	59
Woodside - PSPO extension	114
TOTAL	854

2.2 The responses to the other 5 key questions of the Consultation Questionnaire reaped an overwhelming support for the extension of the 11 alcohol control PSPOs for a further three years and the extension of the boundary of the Woodside Ward Alcohol Control PSPO. The overall responses are itemised below, and the ward-based totals can be found in the Table 1 on page 13 - 15

Q2. Do you believe there is a problem with alcohol related anti-social behaviour in your ward?

YES	572	67%
NO	158	18.5%
DON'T KNOW	124	14.5%

Q3. Do you think we should have a PSPO to deal with street drinking?

YES	715	83.7%
NO	106	12.4%
DON'T KNOW	33	3.9%

Q4. Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

YES, remain in place	704	82.4%
Be Varied	36	4.2%
Be discharged	79	9.3%
No Opinion	35	4.1%

Q5. Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park as shown on the map?

YES, the boundary be extended	493	57.7%
Be Varied further	15	1.8%
Not to be extended	53	6.2%
No Opinion	293	34.3%

Q6. Do you agree that the PSPOs in the other wards should be extended for a further 3 years?

YES, remain in place	681	79.7%
Be Varied further	23	2.7%
Be discharged	63	7.4%
No Opinion	87	10.2%

2.3 Respondents were also asked about what alcohol related anti-social behaviour they had experienced. The results of this are itemised in Table 2, which can be found at page 14 of this report.

2.4 There were 308 additional comments on the Alcohol control PSPO survey. The summary of these comments is itemised in Table 3 at pages 15 to 17 of this report.

2.5 The Demographic Profile of all respondents to the Alcohol Control PSPO consultation survey can be viewed in the table 5 attached at pages 36 to 38 of this report.

3.0. Dog Control PSPO Survey Results

3.1 The consultation process wanted to identify Haringey residents as such individual would be expected to be most affected by the extension of the Borough-wide, Dog Control PSPO. Also, dog owners may feel that the proposed extension of the Dog Control PSPO may impact them differently. To ensure residents and dog owners views were fully represented, the survey questionnaire asked respondents to state whether or not they were a Haringey resident and whether or not the respondent was a dog owner, had owned a dog or was planning to own a dog.

Q1. Are you a Haringey resident?

YES	1130	98.9%
NO	12	1.1%

Q2. Are you a dog owner?

YES	152	13.3%
NO	805	70.5%
Previously Owned a dog	113	9.9%
Thinking of getting a dog	72	6.3%

3.2 The responses to the other 5 key questions of the Dog Control PSPO survey reaped an overwhelming support for the extension of the dog control PSPOs.

TOTAL 1142	Remain in place	Be discharged (ended as no longer needed)	No opinion	Be varied	BLANK
Q3.It is a condition that dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access. Do you think that this condition should	1107	6	2	23	4
	97%	0.5%	0.2%	2.0%	0.3%
Q4. Dogs are excluded from fenced play areas set aside for children and marked sports pitches when in use. The full list is outlined in the Order. Do you think this condition should	1054	15	14	44	15
	92.3%	1.3%	1.2%	3.9%	1.3%
Q5. Dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare	1023	28	19	60	12
	89.6%	2.5%	1.7%	5.2%	1.0%
Q6. It is a condition that dog owners put their dog on a lead when directed to do so by an authorised officer. This applies to any land to which the public have access and where a dog is considered to be out of control. Do you think this condition should	1080	11	11	27	13
	94.6%	1.0%	1.0%	2.3%	1.1%
Q7. The maximum number of dogs that can be walked by one person is six (this applies to any land open to the air to which the public have access). Do you think this condition should	750	22	59	284	27
	65.7%	1.9%	5.1%	25%	2.3%

3.2 With regard to responses to question seven regarding the maximum number of dogs that can be walked by one person is six, there is a significant drop in the agreement for this requirement to remain in place. The main reason for this appears to be owing to a high number of respondents requesting this be varied. Of the 282 respondents asking for this requirement to be varied 276 commented that the maximum number of dogs that can be walked by one person should be reduced to less than six, with the vast majority of these respondents suggesting that four dogs would be a more appropriate maximum. In total, there were 319 additional comments in responding to this question. 94% of all respondents making an additional comment, specified that the maximum number of dogs that can be walked by one person should be less than six or reduced depending on the size, place or ability of the dog walker to control the dogs. This represent almost 1 in 4 of all survey respondents. The breakdown of is detailed in the table below:

The maximum number of dogs that can be walked by one person	
Less than 6 but number not specified	75
Maximum 4 or 5	6
Maximum 4	117

Maximum 3	49
2 or less	35
Depends on size or breed	8
Depends on place dog being exercised	3
Depends on ability of dog walker to control dog e.g. if a professional walker	7
Other comments include: Maximum number not necessary; Number not relevant if dogs are on lead; Restriction could impact professional dog walkers.	19

3.3. There were 561 other comments on the Dog control PSPO survey. 319 other comments related to the maximum number of dogs that can be walked by one person as detailed above. The remaining other comments in relation to the other key survey questions are summarised in Table 3 which can be found at pages 18 to 21 of this report.

3.4. The Demographic Profile of all respondents to the Dog Control PSPO consultation survey can be viewed in Table 6 which is attached at pages 39 to 42 of this report.

4.0. Dog Control PSPO – Additional Requirement Survey Results

4.1 The vast majority of respondents participating in the Dog Control PSPO new requirement survey were Haringey resident but not dog owners

Q1. Are you a Haringey Resident?

YES	598	97.4%
NO	13	2.1%
BLANK	3	0.5%

Q2. Are you a dog owner?

YES	83	13.51%
NO	424	69.1%
Previously Owned a Dog	69	11.2%
Thinking of Getting a Dog	35	5.7%
BLANK	3	0.5%

4.2 There was also overwhelming support for introducing the new requirement, for a person in charge of a dog to carry a means or device to pick up dog faeces, when

exercising their dog(s)

Q3. A Person in charge of a dog can pick up dog faeces (poo) using dog poop bags, other bags, pooper scooper or other means. Should a person in charge of a dog carry a means or device to pick up dog faeces?

YES	585	95.2%
NO	25	4.1%
No Opinion	1	0.2%
BLANK	3	0.5%

4.3. The Demographic Profile all respondents to the Dog Control PSPO - New Requirement consultation survey can be viewed in the Table 7 which is attached at pages 43 to 45 of this report. Additional comments made by Respondents to the key questions and within the general comments box are recorded in in Table 3 at pages 22 to 24 of this report.

5.0 Additional emails and letters

5.1 The council also received a number of other emails and letters from 40 further Respondents, in addition to the main consultation survey results. These are summarised in the table below:

Key Themes	Number of responses
Supports extending duration of alcohol control PSPO	12
Supports extending duration of Dog control PSPO	12
Supports new requirement for a person in charge of a dog to carry bags or a means to pick up dog faeces	12
Proper disposal of dog faeces bags should also be enforced	1
Restricting the number of dogs that one person can walk to under 4	2
Dog owners should clean up after their dog	1
Dog owners should be required to do a dog training course and/or be better educated on dog ownership responsibility	2
Dogs should be on leads in sensitive areas	3
Dogs should be excluded from fenced children's play areas.	2
Public health consequences and environmental problems with dog faeces, and this may include bacteria and viruses harmful to humans.	1
People who never pick up their dog poo and get drunk in parks will continue to do so, order or no.	1
Ban alcohol in glass bottles outdoors	1

Key Themes	Number of responses
Opposes dog control PSPO	1
Opposes restrictions in cemetery, gardens or fenced children's areas	
Poor communication/inadequate Consultation	3
Existing restrictions not adhered to.	6
What is being done to police and enforce the PSPO's already in place and why breaches appear to go unchallenged or addressed? Why are Haringey extending PSPO's while apparently simultaneously failing to enforce existing ones? How will this be enforced?	6
Signs do not deter anything. Signs are vandalised. There are no police resources to patrol the areas regularly!	3
Proposed changes would be very unfair on all the homeless lives	1
more areas of Haringey's parks should be set aside as dog-free and other areas where dogs are allowed but only on a lead.	1
Race and class assumptions that appear to underlie the proposals. Why are the more working class and BAME areas in Haringey being included as proposed areas for PSPOs and not the more middle class and white areas? There is concern that this will not help with sensitivities about policing.	1
Include Other areas: Tottenhall Rec, Andy Ludlow House. Alexandra Ward, Stroud Green Ward, Stationers Park and Finsbury Park, The Paddock or Down Lane Park	8
Why not adopt a boroughwide approach to dealing with both dog control and alcohol?	2

NB: respondent may have made comments under more than one theme, so number will not add up to number of respondents

5.2 The summary and key points of these submissions can be found in Table 4 at pages 25 to 35 of this report.

TABLE 1: Alcohol Control PSPO Survey - Responses by Ward													
Alcohol Control Survey Results Total Online responses; 854		Bounds Green	Bruce Grove	Harringay	Noel Park	Northumberland Park	Seven Sisters	St Ann's	Tottenham Green	Tottenham Hale	West Green Road	Woodside	TOTALS
Q1. There are 11 PSPOs in the borough governing the control of alcohol. Which ward do you live work or visit?		100 11.7 %	65 7.6%	308 36.1 %	57 6.7	29 3.4	36 4.2	47 5.5	30 3.5	9 1%	59 7%	114 13.3	854
Q2. Do you believe there is a problem with alcohol related anti-social behaviour in your ward?	Yes	53	51	192	42	25	28	24	24	7	43	83	572 67%
	No	22	8	72	6	2	4	16	2	2	7	17	158 18.5%
	Don't Know	25	6	44	9	2	4	7	4	0	9	14	124 14.5%
Q3. Do you think we should have a PSPO to deal with street drinking?	Yes	83	55	243	51	28	32	35	28	7	55	98	715 83.7%
	No	15	7	51	4	1	3	8	2	2	3	10	106 12.4%
	Don't Know	2	3	14	2	0	1	4	0	0	1	6	33 3.9%

TABLE 1: Alcohol Control PSPO Survey - Responses by Ward													
Alcohol Control Survey Results Total Online responses; 854		Bounds Green	Bruce Grove	Harringay	Noel Park	Northumberland Park	Seven Sisters	St Ann's	Tottenham Green	Tottenham Hale	West Green Road	Woodside	TOTALS
Q4. Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?	YES, Remain in place	81	55	241	54	28	32	31	27	7	53	95	704 82.4%
	Be varied further	5	0	13	1	0	0	6	1	0	1	9	36 4.2%
	Be discharged	12	6	37	1	1	3	5	1	2	3	8	79 9.3%
	No Opinion	2	4	17	1	0	1	5	1	0	2	2	35 4.1%
Q5. Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park as shown on the map?	YES, the boundary be extended	54	41	151	43	17	18	22	14	6	38	89	493 57.7%
	Be varied further	1	0	5	0	0	0	0	0	0	1	8	15 1.8%
	Not be Extended	5	4	26	0	1	3	3	1	1	2	7	53 6.2%
	No Opinion	40	20	126	14	11	15	22	15	2	18	10	293 34.3%

TABLE 1: Alcohol Control PSPO Survey - Responses by Ward													
Alcohol Control Survey Results Total Online responses; 854		Bounds Green	Bruce Grove	Harringay	Noel Park	Northumberland Park	Seven Sisters	St Ann's	Tottenham Green	Tottenham Hale	West Green Road	Woodside	TOTALS
Q6. Do you agree that the PSPOs in the other wards should be extended for a further 3 years?	YES, Remain in place	79	54	227	51	28	31	32	27	7	49	96	681 79.7%
	Be varied further	1	0	12	0	0	0	3	0	0	3	4	23 2.7%
	Be Discharged	7	5	31	0	1	3	6	1	1	3	5	63 7.4%
	No Opinion	13	6	38	6	0	2	6	2	1	4	9	87 10.2%
Q9. I am responding to this consultation as a	Resident	99	64	303	54	27	34	45	30	9	58	110	833 97.5%
	Person who works in the borough	0	0	1	1	0	0	0	0	0	1	2	5 0.6%
	A Visitor to the borough	0	1	1	0	0	0	0	0	0	0	0	2 0.2%
	Local business	0	0	1	2	2	1	0	0	0	0	0	6 0.7%
	Representative of local community group	1	0	1	0	0	0	2	0	0	0	0	4 0.5%
	Councillor	0	0	1	0	0	1	0	0	0	0	2	4 0.5%

TABLE 2: Alcohol Related Anti-Social Behaviour experienced												
Have you personally experienced any of the following anti-social behaviour incidents related to the consumption of alcohol in Haringey in the last 12 months? Please tick all that apply		Bounds Green	Bruce Grove	Harringay	Noel Park	Northumberland Park	Seven Sisters	St Ann's	Tottenham Green	Tottenham Hale	West Green Road	Woodside	TOTALS
Adults drinking alcohol		53	50	175	43	24	24	24	26	5	43	83	550 64%
Young people drinking alcohol		45	34	148	30	13	15	19	15	3	30	57	409 48%
Threatening or intimidating behaviour by adults		19	35	91	27	18	17	17	15	3	30	47	319 37%
Threatening or intimidating behaviour by young people		20	23	68	15	13	8	11	10	2	21	32	223 26%
Noisy disturbance by adults who have been drinking alcohol		49	46	183	42	20	25	27	23	5	45	71	536 63%
Noisy disturbance by young people who have been drinking alcohol		43	33	144	32	14	13	19	17	3	31	47	396 46.4%
Alcohol litter in the street or park, estate		79	58	237	49	27	27	36	27	5	47	97	689 81%
Have not experienced any of the above		13	9	50	2	3	6	7	3	2	7	8	110 13%
Prefer not to say		2	1	5	0	0	0	1	1	1	0	3	14 1.6%

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Alcohol PSPO Survey	
Q4. Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?	
In the 'other' box beneath this question 164 respondents gave a comment.	
128 made comments in favour of the PSPO remaining in place, being extended further or enforcement strengthened	**The remaining 36 comments varied with some comments regarding the capacity of authorities to enforce the order, commenting that there are bigger problems with drug use or that it was an infringement of people's rights or discriminatory.**
There is ongoing trouble in our local small green Chapmans Green. Men gather there, occasionally women, drinking taking drugs, dealing. People with children avoid the area as it's intimidating- older people do too. There is constant littering and disgusting *There is a serious & daily problem with the consumption of alcohol and anti-social behaviour at the end of Lyndhurst road where it meets the High Road. Groups of men gather daily, consuming alcohol, leering at women, arguing & sometimes fighting with one.* *There are small groups gathering on the end of our road drinking, leaving cans and urinating. I can say people also feel intimidated when walking down the road*	*Only if being antisocial though. "I don't think drinking in the park should be banned - many people do not have the luxury of a garden so a green space is a nice place to be able to relax and enjoy some drinks with friends."* *These orders always unfairly and disproportionately affect homeless, mentally ill and poor people. They are the ones who are targeted by police with fines when others who also drink in the streets are not. You simply cannot resolve this issue with police* *Why no PSPO to stop people smoking crack and taking drugs far more problematic than alcohol related issues* *But it is not enforced! We have people drinking daily on the street urinating, doing drugs*
The COVID-19 Pandemic is a new factor amongst concerns for and against an Alcohol Control PSPO	
"Most drinkers aren't abusive but they do leave bottle tops, cans and broken glass. They also spit, which is very unhygienic in the age of Covid-19. If common sense is applied the drinking isn't the problem, it's litter and spitting."	*"I think in current circumstances it is better if people are congregating in public to drink rather than in people's homes, even if the drinking is public and the behaviour is anti-social. Covid transmission is more of a public risk than the nuisance."*

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Q5. Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park as shown on the map?	
In the 'other' box beneath this question 75 respondents gave a comment.	
49 comments supporting the extension of the Woodside Ward PSPO boundary and/or requesting a PSPO in other areas also.	**The remaining 26 comments were varied:** unable to comment as do not live in the area; insufficient information; same additional as those made to Q4, regarding a PSPO being unnecessary and an infringement on people's rights.
Totally 100%!!! Chapmans Green has suffered terribly from groups of men drinking at all times of day and night (as well as other anti-social behaviour). These PSPO measures are long overdue and very welcome. *Lordship park entrance is now a no-go area due to the alcoholic* *There are frequently gangs of men, smoking and drinking. They are aggressive and abusive, and even as a man, I feel threatened by their stares and comments. Must be tough for women* *Parks are no longer safe because you have gang members present an alcoholic in park due to being drunk we can't take our grandkids there no more* *Chapmans Green has a huge anti-social behaviour due to people drinking, abusing passers-by and littering. A drinking ban is essential so that families and children can start using the little green* *All areas should be covered by this order* *I would prefer that any PSPO is borough wide otherwise it risks appearing discriminatory*	*I don't go there so don't know the extent of the problem* *Cannot find map showing wards and PSPOs* *I have lived here for 20 years and do not think that drinking a beer in the park should be prohibited. This is an attempt at micro control of behaviour* *It is an attack on social class. Drinking is only an excuse to give the police the right to punish homeless people and disadvantage social classes* *You cannot resolve this issue with police* *Parks and outdoor spaces are crucial to locals at this time. We don't need further restrictions on our activities in these spaces* *Punitive action against homeless people is ineffective.*

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES

Q6. Do you agree that the PSPOs in the other wards should be extended for a further 3 years?

In the 'other' box beneath this question 69 respondents gave a comment.

52 comments made reference to alcohol related problems and the need for a PSPO to be present in other areas and/or for the whole borough to be covered.	**11 comments opposing the extensions repeated the same comments as before relating to this being an infringement of rights and/or unnecessary, drugs are more of a problem, 3 relayed lack of information and 3 cited COVID-19 issues**
People should be comfortable in their borough, gangs of drinkers intimidate myself my wife and especially our daughter who has witnessed drunks urinating at the beginning of Seymour road. *Social drinking in streets needs to be acted on. There are problem areas that never get addressed and it leads to communities of drunks and drug users congregating in the same place. We have people drinking on our street corner EVERY DAY and urinating.*	*"Street drinking" should not be a crime. Drinking alcohol responsibly is not a crime. Being publicly intoxicated is ALREADY a crime and there is no need to extend this.* *I am more disturbed by having to breathe air full of cannabis smoke in the street than by people drinking outside.* *Get rid of PSPOs they just give police powers to harass the homeless*

In relation to the whole Survey Questionnaire: There were 97 additional comments requesting Alcohol Control PSPO provisions to be applied to other parts of the borough; these other areas are listed below. There were 12 other comments expressing the need for a Borough-wide alcohol control PSPO

Road and Streets			**Open Green Spaces**	***Wards***
Acacia Road N22	Grove Park Road N15	Stroud Green Road	Alexandra Park	Alexandra
Albans Crescent N22	Hermitage Road N4	Terront Road N15	Alexandra Palace Park	Bounds Green
Alexandra Park Road	Lordship Lane - Both	The Drive N11	Chapmans Green	Bruce Grove
Bounds Green Road	Sides	The Ladder N4	Chestnuts Park	Harringay
Chapmans Green N22	Lyndhurst Road N22	Tollington Park N4	Downshill Park	Muswell Hill
Dongola Road N17	Muswell Hill N10	Turnpike Lane Tube area	Finsbury Park	Stroud Green
Dunbar Road N17	Palace Road N11	Waltheof Avenue	Paignton Park	White Hart Lane
Eastbourne Road N15	Perth Road N22	White Hart Lane N17	Passmore Gardens	St Ann's
Eldon Street N22	Ranelagh Road N22	Winkfield Road N22	Stanley Culross Open	
Glenwood Road N15	Seymour Road N4	Wood Green Crown	Space	
Green Lanes N4	Stanhope Gardens N4	Court area N22	Stanley Road Park	

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Dog Control PSPO Survey	
Q3. It is a condition that dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access	
In the 'other' box beneath this question 53 respondents gave a comment.	
51 comments, adding support to maintaining this provision or strengthening it e.g. increasing fines, increasing enforcement	**Only two comments were critical of this condition**
"I cannot imagine why this condition would even be considered to be removed. If a dog owner is to lazy to pick up their animal's faeces then they probably aren't ready to have a dog" *"The requirement of the safe and responsible disposal of dog faeces should be added to this control. Bags of dog faeces are frequently disposed of on residents' waste bins, thrown into gardens, left by trees or just dropped in the street or by flood water drains"* *Far tougher fines needed, my street is a dog's toilet* *More enforcement and harsher penalties required. Repeat offenders should lose the right to keep dogs* *There is absolutely no excuse for anyone not to clean up their dog mess*	It is against the law to not clean up after your dog generally, so I don't think it is necessary to have a specific rule for Haringey Not being enforced. Worst locations well known and obvious e.g. close to Parkland Walk

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Q4. Relating to the condition that dogs are excluded from fenced play areas set aside for children and marked sports pitches when in use	
In the 'other' box beneath this question 60 respondents gave a comment.	
60 Additional comments, the vast majority supporting this condition,	
44 comments supporting this condition and seeking tougher measures	16 other comments of varied theme: 6 referred to dogs should not be excluded when on leads; 3 raised difficulties for parents; 2 disagreed and 2 requested more designated dog areas.
"More enforcement needed. Dog Owners routinely ignore this prohibition in out local parks and become obstreperous when challenged" *The fenced areas should always be dog free. Although I'm a dog lover I recognise that some people are nervous and would be apprehensive about entering. It could also cause a confrontation it's already being used by a dog walker It is also confusing. Also, we need to know that there is no dog mess.* *Areas where dogs are sometimes allowed should be excluded completely to avoid confusion e.g. Philosophers Garden in Priory Park* *But needs enforcement. Good owners comply, some do not. Make them!* *Parks should also have at least some dog free areas* *Should be amended to anytime, whether in use or not*	Dogs should be on leads in such areas, but not excluded entirely *"If the dog is well behaved and under control – e.g. Made to sit with the owner while the children play then it shouldn't be an issue – It is difficult walking the dog and having children that want to play and not being able to do both. As a single parent it's difficult to do both"* *Clarify "when in use" too vague* *Could an area be made available close to the gate of fenced play areas for children, where dogs could be left safely, so they are inside rather than tied up outside.* *When dogs are well trained and behaved they can enjoy such areas safely with adults and kids, some kids may want to play with their dogs instead of other children*

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Q5. Relating to the condition that dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare	
In the 'other' box beneath this question 84 respondents gave a comment.	
45 comments supporting this condition and/or supporting tougher measures	39 other comment opposing this condition for varied reasons: 17 disagreed felt it was not necessary dogs should be allowed off lead if under control; 16 agreed to churchyard, graveyard & highways, but not other open/green spaces; 6 felt 'half a hectare' restriction was unhelpful/unclear
"Dogs must be on lead on pathways and pavement in green spaces in addition to current requirements. Too many dogs run at children or other vulnerable people who may not want the contact, especially in current context." *"It is absolutely essential that this should include ALL pavement areas, even on side roads - the number of dogs off their leads is frequent. Even if appearing obedient, it takes one distraction (e.g. cat) across on the other side for a dog to rush out into the road and cause an accident/end life"* *"Dogs should be on a lead in ALL green areas within urban areas, i.e. incl. ALL parks. We and our child have numerous times been attacked or jumped at by dogs in parks causing us distress and injuries and damages to clothes and in a pandemic when dogs also can carry Covid19 dogs shall ALWAYS be on lead"* *Extend to all places of worship of all faiths* *Dogs should be on a lead at all times on Homes for Haringey Estates. Children and cats have been attacked by out of control dogs.*	*I don't see why dogs should be on leads in these situations as long as they are well behaved and controlled by the owner* *If a dog is under control it shouldn't need a lead.* *Depends on the behaviour of the dog. Council should have power if dog is misbehaving* *Owners know their dog's recall/temperance and should be allowed to decide this for themselves* *Agree with exception of green spaces less than half a hectare* *Do not think dogs should be kept on lead in green spaces* *Green space less than half a hectare is an unhelpful restriction. Many such sized areas are ideal for dogs and used by them already* *No one knows the size of their green space, anyway, so how can you expect compliance*

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Q6. Relating to the condition that dog owners put their dog on a lead when directed to do so by an authorised officer. This applies to any land to which the public have access and where a dog is considered to be out of control.	
In the 'other' box beneath this question 45 respondents gave a comment.	
25 comments supporting this condition, some asking for extended enforcement	**21 other comments of varied theme: 3 disagreed with this condition; 7 commented there had been a lack of enforcement; 6 felt 'out of control' needed clarifying; 4 felt it was uncleared who was an 'authorised officer'.**
"A dog without a lead is by definition out of the owner's control. Any person should be able to direct an owner to leash their dog when the dog is on designated leash-free areas. In public spaces, all dogs should be leashed - many people feel unsafe when dogs are not under direct leash control." *I believe dogs should always be on leads in public areas like parks. Dogs are a threat to children and a nuisance to people who like to have a quiet walk.* *This should be law. No choice in it.* *Dogs should be on leads in smaller parks so that children and elderly don't have dogs running up to them jumping on them* *It should be varied to allow any member of the public to request this and dog owners who are non-compliant should face a fine.* *There should be a designated fenced "dogs' free run park". In all other parks, dogs should be on leads at all times, and there should be signs in these parks directing owners to the "dogs' free run park".*	*Some officers don't like dogs and would insist on dogs on leads even if they were in control.* *"considered out of control" is underspecified and therefore can lead to arbitrary enforcement. Out of control should be articulated as a set of explicit harmful behaviours (example: attacking other dogs, attacking or aggression towards people, damaging park furniture, etc)."* *The dog needs to demonstrably out of control and not merely running around in play.* *I have never seen any 'authorized officers' telling people to keep their dogs under control.* *Without enforcement this sort of rule undermines good behaviour.* *Define authorised officer. If it's a parking warden the answer is no, a police officer - sure.* *There are rarely any officers enforcing this order but members of the general public are abusing it by asking other dog owners to put their dogs on lead when they have no authority or poor justification (such as being afraid of dogs) to give an order on someone to place their dog on lead.*
New Requirement	

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
Q3. Person in charge of a dog can pick up dog faeces (poo) using dog poop bags, other bags, pooper scooper or other means. Should a person in charge of a dog carry a means or device to pick up dog faeces?	
In the 'other' box beneath this question 160 respondents gave a comment.	
128 comments supporting the requirement and emphasising the impact of dog owners not picking up their dog faeces.	**32 comments of varied theme: 7 raised concerns this could be used as a stop & search tactic and be discriminatory; 13 felt that responsible dog owners may be unfairly penalised; 4 raised concerns about authorisation – who and how condition would be enforced; 3 felt this was unnecessary; 4 disagreed or stipulated exceptions. 1 cited alternative environmentally ways to deal with dog faeces.**
Frankly, it's pretty disgusting if dog owners don't do this. Lots of little children around esp. In parks but elsewhere also. If someone is unable or unwilling to clean up after their dog, they shouldn't have one. Dog fouling is anti-social. *Without the means or device to pick up dog faeces deposited by that dog, the person in charge of a dog would otherwise not be able to comply with the existing order to remove dog faeces.* *In addition to picking up their dog's faeces dog owners should dispose of it responsibly i.e. in the bins provided or take it with them to dispose of at home - dog owners/walkers shouldn't hang the bags on shrubs/trees/signs, or leave lying around* *The level of dog fouling in the streets is a persistent and unacceptable health hazard*	*While they should carry them, I do not believe this is enforceable without stop and search which is not acceptable.* *If faeces is such a concern, the Council should provide bag dispensers in key locations, near bins, etc* *I agree a dog owner should carry bags or other means to pick up faeces, but there are occasionally times when even responsible dog owners run out of bags or forget so these people should not be unfairly penalised by such an order.* *If you are going to enforce this please ensure Officers can offer a bag* *Leaves and sticks are much more environmentally friendly and should be used if appropriate. There is too much plastic waste out there already.* *In the new requirement, it needs to be clear who can make such requests to dog owners. Member of public or authorised official? To prevent potential conflicts, it should be the latter.*

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
If you own a dog, take responsibility for it. Dog faeces not picked up and disposed of properly pose health risks and is unsightly. *Some carry bags but still do not pick up!* *All responsible dog owners carry at least a plastic bag to dispose of any dog faeces. No responsible owner would leave the house without one and claiming they don't have one available is just premeditated obstinance.* *It's been mandatory for years in other Countries, UK should comply as well.* *Just like with any other pets, it is the owner's duty to care for them and this includes waste removal. You clean a hamster cage to remove the droppings. A dog is no different.* *It stands to reason that if people realise that they must carry such means whenever in charge of a dog/dogs, and could be challenged to produce it, the overall incidence of compliance with the requirement to clean up will be increased from its current, far from perfect level.* *Spent 30 minutes cleaning the footpath outside our house on Saturday 10 July - large pile of dog mess had spread for 2 metres. Disgusting.* *Being the owner of a dog is a responsibility. Cleaning up after it is part of that responsibility. London is ever increasing in human and dog population, therefore cleaning up after your dog is increasingly important.* *If you want to own a dog you owe it to the rest of us not to make us step in your dog's shit*	*Yes, but I worry about how this would be enforced for people without means to get the dog poo bags e.g. homeless people? Would there be some leniency on that?* *This is wildly intrusive and goes too far. We do not ask parents to produce evidence that they carry something to pick after their children. This victimises dog owners as though they are guilty until they can prove otherwise. Disgraceful measure.* *This would serve no useful purpose. A dog owner failing to clean up after the dog is already covered by the existing PSPO. Punishing selected dog owners for a hypothetical offence would be both unnecessary and unfair.* *I am extremely concerned about how this new requirement will be enforced with over-zealous enforcement contractors more interested in performing relentless 'stop-and-search' to enrich their companies* *You can always improvise a way to dispose the dog poo and this new protection order could be abused by enforcers* *If an owner has a dog and doesn't pick up its mess they are already able to be fined. I am concerned this will allow targeting of individuals considered to be anti-social and not those who go unnoticed by community officers etc. This leads to more discrimination.* *Obviously, the logical answer to this question is yes, but my concern is about what happens if a person is found not to have such an item. Are they fined or just warned? I am a responsible dog owner who almost always carries poop bags, but very occasionally I forget. That should not be a crime!*

TABLE 3: ADDITIONAL COMMENTS ON SURVEY QUESTIONNAIRES	
People who don't pick up dog mess give responsible dog owners a bad name *It would help if there were adequate Collection Bins in the parks. One at each exit would obviously be best.* *It's essential and common sense* *If they don't have something, they won't be able to pick it up. So, now people will not have an excuse.* *No brainer, surely. Unless they are planning to put it in their pocket.* *There should also be free dog litter bags available at entrances to parks and other green spaces used by dogs* *Dog faeces can cause blindness it is unhygienic, it causes environmental problems. Please make dog owners responsible*	*It would also be a great idea to have rolls of bags at the entrance to parks for dog owners to use if they forget their own means on a particular day, as in Aus.* *I fear that minority ethnic, working class and young people will be disproportionally targeted by the authorities, the same as they are by the police. Their lives are already excessively scrutinised and intruded on.* *Who is going to enforce this?* *How do you plan to enforce this?* *How will owners be challenged about this? What will the penalty be for a dog owner not having poo bags? An instant fine? Also, owners who bring poo bags still often "ignore" their dog's fouling. A way to trace and fine owners from abandoned poo would be more effective.* *Yes, however what if the person has used their bag and disposed of it in a bin how do you enforce that. Do you expect them to carry spares so they can prove it?* *This is an over-reach of police powers. They should not have the ability to detain and fine someone for this. This could be too easily abused, and proper oversight would cost even more. None of this is necessary. Spend the money on men's issues: suicide, male domestic abuse victims, etc* *It's amazingly nanny state, laws are not the answer for everything. Promote behavioural change, not petty legislation.*

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
1	Email – 5 July **Dorset Road N15**	No clear response to consultation questions, but clearly feels dog control and alcohol related ASB are an issue Supports extending duration of PSPOS "*so as far as this order is concerned you wish to bring it in for 3 years you should bring it in for 5years most of it won't work but at least you got something to build on"*	**Borough Resident**
2	2 Emails 6 July	*"The fact is the people who pick up their dog poo and don't get drunk in parks have always behaved this way and will continue to do so, order or no, and the people who never pick up their dog poo and get drunk in parks will continue to do so, order or no. I'd love to be proved wrong about this"* *"Yes I did support the requirement to carry bags"*	**Borough Resident**
3	Email 6 July **Devonshire Road N17**	*Please include Tottenhall Rec .* *There have been many unruly parties resulting in broken bottles, dumped chairs, cans, etc there during lockdown with underage drinking and threatening behaviour.* *Please include the use of Nitrous Oxide and add Andy Ludlow House, and other gathering places to the protection orders.* *Dog walkers. Maximum dogs per person can control 4 if small 2 if large.* *Yes all dog walkers should be required to carry bags for dog faeces. And to pick it up and dispose of it safely! I feel for public protection all dog owners should be required to do a dog training course and pass a test showing that they can control their dog.*	**Borough Resident**
4	Email 6 July **Stellar House & Altair Close N17**	*Different groups of people tend to hang around there drinking taking drugs, they also observe people coming in and out of stellar house.* *I realise there are no easy answers solutions to the above issues.*	**Borough Resident**
5	Email 6 July	*I found two copies of the above leaflet on the stairs to the lst floor of my block of 5 flats. I live on the ground floor and did not have one delivered. If this is the means of communication then sadly residents views will not be taken into account if they do not receive notifications.*	**Borough Resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
6	Email 6 July	*I am writing to inform you of my heightened apprehension towards the proposal to extend the Public Space Protection Orders for a supplementary 36 months. I am hoping, by the end of this short email, you will join me in the mutual disgust I know all creatures of empathy will feel upon reading the letter that's been shoved through our many post holes.* *The Covid-19 pandemic has set in motion many new trends; some will likely yield virtuous ends while others threaten the very fabric of our rich (metaphorically-speaking) and diverse community.* *Why penalise the dog when the human doth discharge with greater malice? Members of our own community are using our public spaces to ablut themselves; meanwhile the council blames the innocuous dog...? And now you propose to enforce a limit on the number of dogs that can be walked by a single owner as if that will somehow stop your human constituents dumping their manure across the borough!*	**Borough Resident**
7	Email 7 July **Fortis Green Ward**	*We support your proposed new requirement which would require a person in charge of a dog to carry bags or a means to pick up dog faeces, and the separate proposal that will require a person in charge of a dog to clean up after their dog. We also support your proposed requirement to require dogs to be on leads in sensitive areas and to exclude dogs from fenced children's play areas. We would support restricting the number of dogs that one person can walk --- ideally no more than two, but we would accept three.* *On alcohol, there does not seem to be a problem in our ward, but in principle we support the proposal to prohibit drinking in a public place, or carrying alcohol in open cans in restricted areas.*	**Borough resident**
8	Email 7 July	My view in regards to the control of alcohol I agree. Plus the use of drugs in public places and residential property It is a widespread than the use of alcohol and both leads to Anti-Social behaviour.	**Residency not specified**
9	Email – 7 July	*Responsible dog ownership is very important. Of course every dog owner should carry with them bags at all times to collect their dog's faeces. Not collecting these causes nuisance for every one, including other dog owners. A dog which is out of control should not be off the lead!*	**Borough resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
		Generally speaking, though, please keep in mind that dog owners do not leave dogs that are out of control, off the lead! *Frankly, I am very upset to read that you now try to prohibit a little freedom in a cemetery, or a peace garden, for a well behaved doggy! And if a fenced children area is entirely empty, where is the harm in letting a dog have some fun or freedom there? London is not very dog friendly as it is.* *I urge you to rethink your proposals! As for the rest of the points raised in your consultation, I think it is a good idea, I would really like if you could ban alcohol in glass bottles outdoors, as they get smashed and hurt the paws of our pets outside. Lately there is broken glass everywhere in my area.*	
10	Email – 7 July **Avenue Road N15**	*You need to think very carefully before you renew police powers in regard to this Act* *Overall, we never see a police officer in the area of South Grove or Avenue Road and only occasionally a PCSO. This is especially true this time of year when so many are on annual leave that one PCSO is left in the office on their own to answer the phone etc. In view of this do you....Believe that the police need this extension and if so, are capable of carrying out the required procedures to enforce the Act?* *Renewing their powers and giving them more responsibility will not work. They have failed since 2017 and another three years would be a waste of public time and money unless the police become more productive in the curtailing of the problems they have failed to control in the first place. On their own admission, the police cannot cope now as they don't have enough officers, another three-year extension will be just as counterproductive and of no benefit to the community.* *I cannot support the renewal under the circumstances that presently exist.*	**Borough Resident**
11	Email 8 July **N6 area**	*All residents in Haringey agree that dogs should not foul public areas, pavements and parks. How will Haringey police and enforce this? This is a significant problem in N6 particularly, Denewood Road, Sheldon Avenue, Stormont Road. Broadlands and Bishopswood.There are as you know, significant public health consequences and environmental problems with dog faeces, and this may include bacteria and viruses harmful to humans.*	**Borough resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
12	Email 8 July **Turnpike Lane**	*In my area, there are some weird people who spend their time into hustling , living in the street, using drugs, drinking alcohol. These people often have dogs. Of course, these dogs do not take any kind of vaccination. And they are not kept on a lead. So, in case they bite someone, they can carry rabies. Two dogs of this kind of weird man, attacked another dog and the lady who the dog belonged to two days ago. It was terrible.* *I really appreciate, what are you doing and, as a person who lives in this area, I really hope you could improve your service, with all sort of administrative sanction, to protect those who respect the rules and look after their neighbours.*	**Borough Resident**
13	Email 8 July	*I would like to voice my opinion on the proposed changes as I believe they would be very unfair on all the homeless lives.*	**Residency no specified**
14	Email 8 July **Ducketts common N8**	*In general terms I agree wholeheartedly with your two proposals, especially with regard to the behaviour of dog owners; on any sunny day Ducketts Common attracts lots of families with young children and I have witnessed many instances where dog owners (I have to say mainly older and male) allowing their dogs to defecate on the grass and simply walking away leaving the mess.*	**Borough Resident**
15	Letter 8 July **Passmore gardens N11**	*I agree whole heartedly with the proposal, but do not wish to do a form on line.*	**Borough Resident**
16	Email 8 July **Perth Road N22**	***Dog Control Public Space Protection Order*** *Except for a very brief period of time, I have been a dog owner all of my life and at present have two. I thoroughly support responsible dog ownership and am intrigued how you intend to "police" any of your proposals.* *I have on numerous occasions contacted the council about dog fouling not only down my road but also in my front garden, I would NEVER allow my dogs to be unleaded or uncollared in a public street. I also find it offensive that when I walk my dogs in the Garden of Peace in Tottenham to visit graves of my parents and grandparents dogs are allowed to roam around unchecked, chasing the wildlife and fouling on graves. I have confronted owners only as expected to be abused. Not since I was a child have I seen any dog wardens or patrols in*	**Borough Resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
		these places. I and my responsible dog walking friends who clear up after others would welcome fines for those not clearing up after their dogs and even not carrying poo bags, but I cannot see this happening. ***Alcohol Public Space Protection Orders*** *In December of 2019 a friend and I started cleaning up our park, it took us until the end of February, I cannot tell you the disgusting rubbish that we cleared from our park but a good proportion of it was bottles and cans of empty alcohol. The residual rubbish was a product of this including human waste, condoms etc. I go to the park around 6am every day and usually end up with at least one sack of rubbish from the park.* *Whilst I appreciate all of your endeavours and your proposals in the letter of 1st July, you will excuse me cynicism that anything will change, that anything will be enforced and that this time next year I will still be clearing up other peoples dog mess from my front garden and from my park and that I will not still be knee deep in empty beer cans, discarded vodka bottles and a river of glistening silver canisters every single morning of the week.*	
17	Email – 9 July **Northumberland park Ward**	*We already have restrictions on alcohol in public areas and dogs on leads and dog fouling as outlined in your letter - unfortunately they are not adhered to and we have a very serious issue with drinking in public and drug use in public e.g. Bruce Castle Park, Tottenham Graveyard, benches on road by White Hart Lane station, outside Coombs Croft Library, Road Barrier on Beaufoy Road N17 - parties in graveyard and park!* *People have dogs off lead in graveyard despite signs and staff working in graveyard and people allow dogs foul pavements, park and graveyard and don't always pick it up.* *I would like to know what is being done to police and enforce the PSPO's already in place and why breaches appear to go unchallenged or addressed?* *Why are Haringey extending PSPO's while apparently simultaneously failing to enforce existing ones? Putting up signs is all good and well but doesn't deter anything, there are no police resources to patrol the areas regularly!*	**Borough Resident**
18	Email 9 July **Tower Gardens area**	*I hope Haringey Council introduces a Dog Control Public Space Protection Order because some of the dog owners do not clear the faeces made by their dogs from the pavements of the Tower Gardens Conservation area.* *I have often reported to the council faeces on the pavement where Risley Avenue meets Teynton Terrace and The Roundway.*	**Borough Resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
19	Email 9 July **Tottenham**	*I have to say I was very disappointed in the consultation form, as it did not cover so many areas and would not allow you to fill very much in the boxes. In my opinion there should have been a questions on eg. Have you or your family been effected by people drinking near to where you live? What is the location? What time does this take place? Have you ever notified the Council of your concerns? Have you ever had to ring the Police? Are there enough notices informing the public that they are breaking the law if they are caught drinking etc? I could have answered all these questions as where I live it is a real problem as I know it is for alot of residents living in Tottenham. In my opinion and that of my neighbours this matter is not taken seriously enough by the Police or the Council as I do not think you are really aware of the effect it has on residents and where the hot spots are.Thanks for taking the time to read this.*	**Borough Resident**
20	Email – 10 July **Quernmore Road**	*I am wholly supportive of these proposals .* *My biggest concern relates to enforcement. Obviously, there is little point in making or extending any kind of regulation unless this is monitored and enforced. B* *I am of the very firm opinion that all dog owners should be obliged to carry bags to pick up dog faeces which, as I'm sure you are aware, is not only very unpleasant but also a significant health hazard. They should also be obliged to dispose of the bags properly. There is a significant problem at the moment with dumping of dog faeces bags on the street or (even worse) hanging them on railings, trees or bushes.*	**Borough Resident**
21	Email 10 July **Stapleton Hall**	*I'd like to say that we have too many dogs allowed to foul the peace garden on the corner of Stapleton hall road and granville road. It's mostly children playing there after school ask yet people treat it as a dogs toilet.* *Equally at night during the summer there's too much drinking and noise in a residential area on those benches.*	**Borough Resident**
22	Email 12 July **Dukes Avenue N10**	*Wondering why there is no APSPO for Alexandra Ward??* *I'm sure you are aware of the police involvement in and around the Avenue, N10 and installation of CCTV on account alcohol use and disorder*	**Borough Resident**
23	Email 14 July **Linden Road N15**	*Dog Control Public Space Protection Order:-I do support the whole proposal.* *Alcohol Public Space Protection Orders:-I do support the whole proposal.*	**Borough Resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
24	Email 14 July **Allington Avenue N17**	*The green area in the middle is basically the local dog toilet, disgustingly residents on our avenue and residents from the Somerset gardens estate bring their dogs to pooh and many many don't pick it up. It Attracts flies and it's hideous.*	**Borough Resident**
25	Letter 14 July **Woollaston Road N4**	*We wish to register our support to extend Dog & Alcohol control in public spaces. Likewise we are in agreement for the requirement of dog owners to carry bags and remove their faeces. There appears to be a proliferation of dog ownership – some of whom are not cleaning up after them.*	**Borough Resident**
26	14 July **Woodside Ward**	*Chapman's Green Park is the kind of place you wouldn't cross, if not strictly necessary. It is often populated with groups of adults consuming alcohol at any time of the day with consequent littering of bottles and cans.* *Dogs control is another issue in the area. In three years that I've lived here I've never seen anybody picking up after their dogs; hence why I reckon it should be mandatory for dog owners to carry bags or other means to pick up. This policy has been introduced in other countries since several years now.* *Also I would like to say that even though I do not own a dog I love them and I have nothing against dogs but owners need to be educated.*	**Borough Resident**
27	Email 15 July **Summerhill Road N15**	*As residents we have experienced major problems with street drinking and anti social behaviour in Elizabeth Place, outside St Phillips Church in Phillip Lane and various street corners in West Green Road. The major problems are in Elizabeth Place and outside the Church. Notices were put up stating that this was part of PSPO area. It should be noted that many of the notices were torn down by the drinkers! We have had large groups of all ages and ethnicities drinking late into the night on one occasion last year they started drinking late afternoon and the "party" went on until 11.00pm, they even bought plastic glasses to drink out of and a barbecue. Residents have spent hours clearing up their rubbish, the amount of cans bottles food that is thrown in bushes is enormous.* *It is essential that the PSPO remains in these areas, it is not only the amount of alcohol that is consumed but all the behaviour that is associated with it eg reving up car/motor bikes; music being played loudly, the amount of rubbish they leave.*	**Borough Resident Neighbourhood Watch Rep**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
28	Email 15 July **Cranbrook Park**	*I am in favour of the extension of the public space protection orders dog control & alcohol control orders for a further three years. I live in Cranbrook Park & i have seen a great improvement in the area since the orders have been in place and I don't want to back to the days before the order.*	**Borough Resident**
29	Letter – 17 July **Elizabeth Close N15**	*We do not have a computer so we cannot fill your survey out. We live in Elizabeth Close which backs onto Elizabeth Place near to Summerhill Road N15/Bedford Road. For many years residents have experienced very high levels of men of all ages and backgrounds who come here – Elizabeth Place sit around on the cars /bikes/scooters shouting, drinking, music, smoking (legal/illegal), doing deals, selling cigarettes/cars etc.* *notices went up telling then they could not behave in this was – PSPO – however most of notices got torn down, one in fact got burnt.* *Even when things were at their worst with drinkers/ anti-social behaviour etc, there were never 20/30 people drinking. It is not on ! There are also problems with drinkers around West Green Road going down towards the Seven Sisters and outside the church in Philip Lane near Cromwell Road*	**Borough Resident**
30	Email 20 July	*In response to your dog patrol space protection order...* *Go for it...everyone should clear up after their dog....!!* *I would suggest that cat owners should be added to this space protection order..*	**Residency not specified**
31	Email 22 July **Elizabeth Place**	*I just wanted you to know residents experiences over this week end in the area of Elizabeth Place N15.numerous youths congregating near to the corner of Bedford Road at various times during the weekend, riding bikes and scooters; older men seen drinking in groups also at one stage in Elizabeth Place. In the early hours of the morning around 2.30am by this time it was Monday morning 3 cars arrived talking loudly laughing and generally having a good time, bottles/cans of alcohol found next day where they had been.*	**Borough Resident**
32	Letter 22 July **Bedford Road N15**	*A short line to say that I'm in favour of the dog control Public Space Protection Order as it is a safeguard to public health. Its also good if dogs are on leads in the sensitive areas that you mention in your letter to residents. A black bag would certainly help to comply with this order. It appears humans also need a P.S.P.O as they also, at times foul the environment*	**Borough Resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
33	Letter – August **Elizabeth Place N15**	*We wanted to let you know that we think it is vital that you continue with the PSPO especially where we live. We get trouble all the time especially in Elizabeth Place/ Lawrence Road/West Green Road?philip Lane. There are always men of all ages drinking, music "smoking" causing a nuisance with their bikes, mopeds, motorbikes, cars, sometimes it goes on all night until the early hours. You hardly every see a police van/car patrolling the area even though they know where these people hang out. We don't think the Council take it serious enough . we often wonder why they do not have the same problems in Muswell Hill or Crouch End.*	**Borough Resident**
34	Email 1 August **Warner Estate Alexandra Palace Park**	*Why is the PSOP or similar measures not being extended to Alexandra Ward to help address the situation? Why is the council not doing more to address this nuisance?*	**Borough Resident**
35	Email 10 August 2020 **Bounds Green Ward**	*I'm writing about the current website consultation regarding the renewal and extension of PSPOs relating to dog control and alcohol to 8 of the 9 Tottenham wards and 3 Hornsey and Wood Green wards including Bounds Green. Could you please let me know the rationale behind the choice of these wards and the source of the data informing it?* *A number of Bounds Green residents have raised issues, being particularly concerned about the race and class assumptions that appear to underlie the proposals. Why are the more working class and BAME areas in Haringey being included as proposed areas for PSPOs and not the more middle class and white areas? There is concern that this will not help with sensitivities about policing.* *What are the reasons for not adopting, like other boroughs such as Islington, a boroughwide approach to dealing with both dog control and alcohol?*	**Local Cllr**
36	Email 12 August 2020 **Local Cllr Stroud Green Ward**	*No proposal to include any part of Stroud Green ward for alcohol control areas* *there are areas/pockets of alcohol abuse in Stroud Green.*	**Local Cllr**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
37	Email 12 August **Stroud Green Road**	*As a Stroud Green resident I am upset that there is no proposal to include any part of Stroud Green ward for alcohol control areas. As a Stroud Green resident I am therefore unable to complete the consultation questionnaire to express my views as the questionnaire requires me to state which of the current wards covered by PSPOs I live or work in. I live in Stroud Green so am not being consulted.* *This should be a borough-wide consultation, and I and others who live in the ward (including yourselves) are effectively prevented from expressing a view.* *For information if I was able to participate I would say that I think that that Stationers Park and Finsbury Park (which isn't in Stroud Green but which is used by a lot of Stroud Green residents) should both be covered by alcohol control zones. Neither is covered at present and neither will be if the proposals are rubber-stamped. As you are no doubt aware there is alcohol-related anti-social behaviour associated with both parks.* *The PSPO is not a ban on drinking in parks - which I wouldn't support - but a power for uniformed officers to prevent alcohol-related ASB and nuisance more easily (by confiscating alcohol or issuing FPNs etc).*	**Borough resident**
38	**Email** 13 August **The Paddock Down Lane Park**	*I am concerned that neither the Paddock or Down Lane Park will have an alcohol PSPO in place and that the current situation is that the status will remain as is. I would like this to be reconsidered:* *Both spaces have a history of Anti-social behaviour, that is still occurring.* *The Paddock while currently a nature reserve will be developed so it achieves a higher status of protection, this could be significantly affected by ASB issues. Additionally, there is clear evidence that considerable alcohol consumption happens this is clearly evidenced by the alcohol related litter that is regularly found on site.*	**Works in Borough**
39	Email 14 August	I completely agree with the requirement: "A person in charge of a dog on land to which this order applies to produce on request a means or device to pick up dog faeces deposited by that dog." I also believe the Dog Control Public Space Protection Order (PSPO) should be extended for a	**Borough Resident**

TABLE 4: Additional emails and letters received			
	DATE & SOURCE	**SUMMARY/KEY COMMENTS**	**Category of Respondent**
		further 3 years. Further I think that more areas of Haringey's parks should be set aside as dog-free and other areas where dogs are allowed but only on a lead.	
40	Email 14 August **Hornsey Lane Gardens Area**	*It does not seem apt or kind to keep dogs in cities; even if you only consider, for a start, a dog's acute sense of and reaction to odours and fumes: If we humans complain and suffer, how much more do poor creatures in a city?* *Then the poor dogs suffer indignity having publicly to deposit their excrement on hard pavements, demeaning to any creature (animals also have dignity) and surely unhygienic (+possible traces of toxocara, tapeworms etc) even though the owner does pick it up in a bag – a necessary but disgusting and degrading act in itself – bearing it until a bin is found.* *Can civilisation not do better?* *It is a dog's instinct to find a secluded leafy or long-grassed patch to deposit its faeces and then with its hind legs cleanly and decently kick over covering leaves and grass. To what humiliation does humanity in urban areas subject dogs?* *Dogs easily and frequently get out of control on public paths and rush upon strangers, yelping wildly and leaping up for no plausible reason. Supposing any one of us should rush up and jump upon a stranger, pawing, scratching and slobbering spittle? Would this not be assault? With dogs this happens and the dumb owners beam stupidly "He's just pleased to see you – He's only being friendly* *Civic powers-that-be, please :* • *Have all dogs on pedestrianised areas secure on a firm restricted-length leash.* • *Have walkers handling groups of dogs be limited as to number and size of dogs per walker, avoid crowded public, conservation and residential areas; and especially be vetted and officially registered.*	**Borough resident**

Table 5: Demographic Profile Showing the composition of the Alcohol Control PSPO Consultation sample			
Total Survey Respondents:854		**Proportion %**	
		Base Respondents	Survey Respondents
BASE: 471 Respondents			
At birth, were you described as			
Male	196	41.6%	23.0%
Female	264	56.1%	30.9%
Prefer not to say	11	2.3%	1.3%
No response	383	-	44.8%
BASE: 467 Respondents			
Which of the following describes how you think of yourself?			
Male	200	42.8%	23.4%
Female	264	56.5%	30.9%
Bisexual	1	0.2%	0.1%
Non-Binary	2	0.4%	0.2%
No response	387	-	45.3%
BASE: 773 Respondents			
What is your age?			
16-24	12	1.6%	1.4%
25-44	308	39.8%	36.1%
45-64	292	37.8%	34.2%
65+	133	17.2%	15.6%
Prefer not to say	28	3.6%	3.3%
No Response	81	-	9.5%
BASE: 123 Respondents			
Disability			
No disabilities	626		73.3%
Do you have any of the following conditions which have lasted or expected to last for at least 12 months?			
Blindness or partial loss of sight	5	4.1%	0.6%
Learning disability	3	2.4%	0.4%
Physical disability	21	17.1%	2.5%
Mental ill health	23	18.7%	2.7%
Long term illness or condition	45	36.6%	5.3%
Developmental disorder	3	2.4%	0.4%
Deafness or partial loss of hearing	15	12.2%	1.8%
Any other disabilities	8	6.5%	0.9%
BASE: 302 Respondents			
Ethnicity			
What is your country of birth?			
Australian & New Zealand	7	2.3%	0.8%
Belgium	2	0.7%	0.2%
Canada	2	0.7%	0.2%
China	2	0.7%	0.2%
Cyprus	2	0.7%	0.2%
France	4	1.3%	0.5%
Germany	3	1.0%	0.4%
Ireland	12	4.0%	1.4%

Italy	4	1.3%	0.5%
Nigeria	2	0.7%	0.2%
Other African/Caribbean	6	2.0%	0.7%
Other Arab	2	0.7%	0.2%
Other Asian	6	2.0%	0.7%
Other EU	6	2.0%	0.7%
Other European	2	0.7%	0.2%
Poland	2	0.7%	0.2%
Spain	2	0.7%	0.2%
South American	5	1.7%	0.6%
United Kingdom	224	74.2%	26.2%
United States	5	1.7%	0.6%
Not Specified	2	0.7%	0.2%
Blank	552	-	64.6%
BASE: 854 Respondents			
How would you describe your ethnic group?			
White			
English, Welsh, Scottish, N Irish, British	408	47.8%	47.8%
Irish	26	3.0%	3.0%
Gypsy or Irish Traveller	3	0.4%	0.4%
Any other white background	92	10.8%	10.8%
Black / African / Caribbean / Black British			
African	187	21.9%	21.9%
Caribbean	24	2.8%	2.8%
Any other Black / African / Caribbean / Black British ethnic background	28	3.3%	3.3%
Mixed / multiple ethnic backgrounds			
White and Black Caribbean	9	1.1%	1.1%
White and Black African	5	0.6%	0.6%
White and Asian	12	1.4%	1.4%
Any other mixed/multiple ethnic background	7	0.8%	0.8%
Any other Asian / Asian British ethnic background			
Asian / Asian British	8	0.9%	0.9%
Indian	17	2.0%	2.0%
Pakistani	4	0.5%	0.5%
Bangladeshi	8	0.9%	0.9%
Chinese	8	0.9%	0.9%
Any other ethnic group			
Arab	8	0.9%	0.9%
BASE: 700 Respondents			
What is your religion?			
No religion	418	59.7%	48.9%
Buddhist	132	18.9%	15.5%
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	118	16.9%	13.8%
Hindu	3	0.4%	0.4%

Jewish	6	0.9%	0.7%
Muslim	11	1.6%	1.3%
Sikh	3	0.4%	0.4%
Any other Religion	9	1.3%	1.1%
No response	154	-	18.0%
BASE: 685 Respondents			
Which of the following options best describes how you think of yourself?			
Heterosexual or straight	498	72.7%	58.3%
Gay or lesbian	37	5.4%	4.3%
Bisexual	74	10.8%	8.7%
Other	13	1.9%	1.5%
Prefer not to say	63	9.2%	7.4%
No Response	169	-	19.8%
BASE: 423 Respondents			
Are you pregnant?			
Yes	5	1.2%	0.6%
No	393	92.9%	46.0%
Prefer not to say	25	5.9%	2.9%
No response	431	-	50.5%
BASE: 390 Respondents			
Have you had a baby in the last 12 months?			
Yes	0	0.0%	0.0%
No	369	94.6%	43.2%
Prefer not to say	21	5.4%	2.5%
No response	464	-	54.3%
BASE: 446 Respondents			
What is your legal marital or civil partnership status?			
Never married and never registered a civil partnership	182	40.8%	21.3%
Married or in a civil partnership	201	45.1%	23.5%
Widowed or surviving partner from a civil partnership	16	3.6%	1.9%
Divorced or legally dissolved from a civil partnership	41	9.2%	4.8%
Separated but still legally married or in a civil partnership	6	1.3%	0.7%
No response	408	-	47.8%
Are you a refugee or an asylum seeker?			
A Refugee	97	-	11.4%
An Asylum Seeker	113	-	13.2%
If so, what country or region are you a refugee/asylum seeker from?			
What is your main language?			
English	415	-	48.6%
Other	28	-	3.3%

Table 6: Demographic Profile
Showing the composition of the Dog Control PSPO Consultation sample

Total Survey Respondents:1142		Proportion %	
		Base Respondents	Survey Respondents
BASE: 1008 Respondents			
At birth, were you described as			
Male	405	40.2%	35.5%
Female	580	57.5%	50.8%
Prefer not to say	23	2.3%	2.0%
No response	134	-	11.7%
BASE: 1001 Respondents			
Which of the following describes how you think of yourself?			
Male	417	42%	51%
Female	584	58%	37%
Non-Binary	0	0%	0%
No response	141	-	12%
BASE: 1087 Respondents			
What is your age?			
16-24	10	0.9%	0.9%
25-44	337	31.0%	29.5%
45-64	440	40.5%	38.5%
65+	250	23.0%	21.9%
Prefer not to say	50	4.6%	4.4%
No Response	55	-	4.8%
BASE: 176 Respondents			
Disability			
No disabilities	892		78.1%
Do you have any of the following conditions which have lasted or expected to last for at least 12 months?			
Blindness or partial loss of sight	9	5.1%	0.8%
Learning disability	4	2.3%	0.4%
Physical disability	37	21.0%	3.2%
Mental ill health	29	16.5%	2.5%
Long term illness or condition	55	31.3%	4.8%
Developmental disorder	3	1.7%	0.3%
Deafness or partial loss of hearing	28	15.9%	2.5%
Any other disabilities	11	6.3%	1.0%
BASE: 302 Respondents			
Ethnicity			
What is your country of birth?			
Australian & New Zealand	7	2.3%	0.6%
Belgium	2	0.7%	0.2%
Canada	2	0.7%	0.2%
China	2	0.7%	0.2%
Cyprus	2	0.7%	0.2%
France	4	1.3%	0.4%
Germany	3	1.0%	0.3%
Ireland	12	4.0%	1.1%

Italy	4	1.3%	0.4%
Nigeria	2	0.7%	0.2%
Other African/Caribbean	6	2.0%	0.5%
Other Arab	2	0.7%	0.2%
Other Asian	6	2.0%	0.5%
Other EU	6	2.0%	0.5%
Other European	2	0.7%	0.2%
Poland	2	0.7%	0.2%
Spain	2	0.7%	0.2%
South American	5	1.7%	0.4%
United Kingdom	224	74.2%	19.6%
United States	5	1.7%	0.4%
Not Specified	2	0.7%	0.2%
Blank	840	-	73.6%
BASE: 1213 Respondents			
How would you describe your ethnic group?			
White			
English, Welsh, Scottish, N Irish, British	704	58.0%	61.6%
Irish	35	2.9%	3.1%
Gypsy or Irish Traveller	2	0.2%	0.2%
Any other white background	110	9.1%	9.6%
Black / African / Caribbean / Black British			
African	187	15.4%	16.4%
Caribbean	25	2.1%	2.2%
Any other Black / African / Caribbean / Black British ethnic background	4	0.3%	0.4%
Mixed / multiple ethnic backgrounds			
White and Black Caribbean	11	0.9%	1.0%
White and Black African	1	0.1%	0.1%
White and Asian	24	2.0%	2.1%
Any other mixed/multiple ethnic background	21	1.7%	1.8%
Any other Asian / Asian British ethnic background			
Asian / Asian British	8	0.7%	0.7%
Indian	25	2.1%	2.2%
Pakistani	6	0.5%	0.5%
Bangladeshi	8	0.7%	0.7%
Chinese	13	1.1%	1.1%
Any other ethnic group			
Arab	7	0.6%	0.6%
Other	22	1.8%	1.9%
BASE: 987 Respondents			

What is your religion?			
No religion	597	60.5%	52.3%
Buddhist	14	1.4%	1.2%
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	293	29.7%	25.7%
Hindu	11	1.1%	1.0%
Jewish	30	3.0%	2.6%
Muslim	29	2.9%	2.5%
Sikh	2	0.2%	0.2%
Any other Religion	11	1.1%	1.0%
No response	155	-	13.6%
BASE: 987 Respondents			
Which of the following options best describes how you think of yourself?			
Heterosexual or straight	790	80.0%	69.2%
Gay or lesbian	47	4.8%	4.1%
Bisexual	21	2.1%	1.8%
Other	7	0.7%	0.6%
Prefer not to say	122	12.4%	10.7%
No Response	155	-	13.6%
BASE: 884Respondents			
Are you pregnant?			
Yes	11	1.2%	1.0%
No	822	93.0%	72.0%
Prefer not to say	51	5.8%	4.5%
No response	258	-	22.4%
BASE: 808 Respondents			
Have you had a baby in the last 12 months?			
Yes	24	3.0%	2.1%
No	734	90.8%	64.3%
Prefer not to say	50	6.2%	4.4%
No response	334	-	29.2%
BASE: 961 Respondents			
What is your legal marital or civil partnership status?			
Never married and never registered a civil partnership	316	32.9%	27.7%
Married or in a civil partnership	500	52.0%	43.8%
Widowed or surviving partner from a civil partnership	44	4.6%	3.9%
Divorced or legally dissolved from a civil partnership	91	9.5%	8.0%
Separated but still legally married or in a civil partnership	10	1.0%	0.9%
No response	181	-	15.8%
Are you a refugee or an asylum seeker?			
A Refugee	6	-	0.5%
An Asylum Seeker	2	-	0.2%
If so, what country or region are you a refugee/asylum seeker from?			

What is your main language?			
English	933	-	81.7%
Other	60	-	5.3%

Table 7: Demographic Profile
Showing the composition of the Dog Control PSPO New Requirement Consultation sample

Total Survey Respondents:614		Proportion %	
		Base Respondents	Survey Respondents
BASE: 450 Respondents			
At birth, were you described as			
Male	256	56.9%	41.7%
Female	185	41.1%	30.1%
Intersex	0	0.0%	0.0%
Prefer not to say	9	2.0%	1.5%
No response	164	-	26.7%
BASE: 469 Respondents			
Which of the following describes how you think of yourself?			
Male	205	45.6%	33.4%
Female	263	58.4%	42.8%
Non-Binary	1	0.2%	0.2%
No response	145	-	23.6%
BASE: 530 Respondents			
What is your age?			
16-24	2	0.4%	0.3%
25-44	162	30.6%	26.4%
45-64	238	44.9%	38.8%
65+	113	21.3%	18.4%
Prefer not to say	15	2.8%	2.4%
No Response	84	-	13.7%
BASE: 100 Respondents			
Disability			
No disabilities	418	-	68.1%
Do you have any of the following conditions which have lasted or expected to last for at least 12 months?			
Blindness or partial loss of sight	9	9.0%	1.5%
Learning disability	2	2.0%	0.3%
Physical disability	16	16.0%	2.6%
Mental ill health	14	14.0%	2.3%
Long term illness or condition	35	35.0%	5.7%
Developmental disorder	2	2.0%	0.3%
Deafness or partial loss of hearing	16	16.0%	2.6%
Any other disabilities	6	6.0%	1.0%
BASE: 360 Respondents			
Ethnicity			
What is your country of birth?			
Australian & New Zealand	10	2.8%	1.6%
Canada	3	0.8%	0.5%
Cypriot	2	0.6%	0.3%
France	2	0.6%	0.3%
Germany	4	1.1%	0.7%
India	3	0.8%	0.5%
Iran	2	0.6%	0.3%
Ireland	9	2.5%	1.5%
Italy	6	1.7%	1.0%
Nigeria	2	0.6%	0.3%

Other African	4	1.1%	0.7%
Other Asian	7	1.9%	1.1%
Other EU	7	1.9%	1.1%
Other European	5	1.4%	0.8%
Spain	3	0.8%	0.5%
South American	4	1.1%	0.7%
United Kingdom	277	76.9%	45.1%
United States	6	1.7%	1.0%
Not Specified	4	1.1%	0.7%
Blank	254	-	41.4%
BASE: 495 Respondents			
How would you describe your ethnic group?			
White			
English, Welsh, Scottish, N Irish, British	341	68.9%	55.5%
Irish	13	2.6%	2.1%
Gypsy or Irish Traveller	3	0.6%	0.5%
Any other white background	63	12.7%	10.3%
Black / African / Caribbean / Black British			0.0%
African	5	1.0%	0.8%
Caribbean	9	1.8%	1.5%
Any other Black / African / Caribbean / Black British ethnic background	6	1.2%	1.0%
Mixed / multiple ethnic backgrounds			0.0%
White and Black Caribbean	3	0.6%	0.5%
White and Black African	1	0.2%	0.2%
White and Asian	15	3.0%	2.4%
Any other mixed/multiple ethnic background	2	0.4%	0.3%
Any other Asian / Asian British ethnic background			0.0%
Asian / Asian British	3	0.6%	0.5%
Indian	5	1.0%	0.8%
Pakistani	12	2.4%	2.0%
Bangladeshi	2	0.4%	0.3%
Chinese	5	1.0%	0.8%
Any other ethnic group	**7**	1.4%	1.1%
BASE: 460 Respondents			
What is your religion?			
No religion	284	61.7%	46.3%
Buddhist	9	2.0%	1.5%
Christian (including Church of England, Catholic, Protestant and all other Christian denominations)	132	28.7%	21.5%
Hindu	7	1.5%	1.1%
Jewish	7	1.5%	1.1%
Muslim	9	2.0%	1.5%
Sikh	0	0.0%	0.0%
Any other Religion	12	2.6%	2.0%
No response	154	-	25.1%

BASE: 465 Respondents			
Which of the following options best describes how you think of yourself?			
Heterosexual or straight	375	80.6%	61.1%
Gay or lesbian	37	8.0%	6.0%
Bisexual	5	1.1%	0.8%
Other	3	0.6%	0.5%
Prefer not to say	45	9.7%	7.3%
No Response	150	-	24.3%
BASE: 422 Respondents			
Are you pregnant?			
Yes	1	0.2%	0.2%
No	396	93.8%	64.5%
Prefer not to say	25	5.9%	4.1%
No response	192	-	31.3%
BASE: 409 Respondents			
Have you had a baby in the last 12 months?			
Yes	14	3.4%	2.3%
No	371	90.7%	60.4%
Prefer not to say	24	5.9%	3.9%
No response	205	-	33.4%
BASE: 455 Respondents			
What is your legal marital or civil partnership status?			
Never married and never registered a civil partnership	157	34.5%	25.6%
Married or in a civil partnership	232	51.0%	37.8%
Widowed or surviving partner from a civil partnership	14	3.1%	2.3%
Divorced or legally dissolved from a civil partnership	48	10.5%	7.8%
Separated but still legally married or in a civil partnership	4	0.9%	0.7%
No response	159	-	
Are you a refugee or an asylum seeker?			
A Refugee	4	-	0.7%
An Asylum Seeker	1	-	0.2%
If so, what country or region are you a refugee/asylum seeker from?			
What is your main language?			
English	415	-	67.6%
Other	23	-	3.7%

A Council can use Public Space Protection Orders (PSPOs) to restrict the consumption of alcohol in a public space where it is associated with anti-social behaviour. The PSPO will allow Police and Authorised Officer to ask individuals to stop drinking and have their alcoholic drinks confiscated if they are deemed to be acting antisocially. It is an offence to fail to comply with a request to stop drinking or surrender alcohol in the area covered by the PSPO.

Data Protection and Privacy Statement (opens in a new window)

* = response required

Q1. There are 11 PSPOs in the borough governing the control of alcohol. Which ward do you live work or visit? *

- ❑ Bounds Green
- ❑ Bruce Grove
- ❑ Harringay
- ❑ Noel Park (PSPO covers the whole ward)
- ❑ Northumberland Park (PSPO covers the whole ward)
- ❑ St Ann's
- ❑ Seven Sisters (PSPO covers the whole ward)
- ❑ Tottenham Green (PSPO covers the whole ward)
- ❑ Tottenham Hale
- ❑ West Green Road
- ❑ Woodside - PSPO extension

Q2. Do you believe there is a problem with alcohol related anti-social behaviour in your ward? *

- ❑ Yes
- ❑ No
- ❑ Do not know

Q3. Do you think we should have a PSPO to deal with street drinking? *

- ❑ Yes
- ❑ No
- ❑ Do not know

Q4. Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years? *

- ❑ Yes, remain in place
- ❑ Be varied (please explain below)
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion

Please add your comments her

Q5. Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park as shown on the map? *

- ❑ Yes, the boundary be extended
- ❑ Be varied further (please explain below)
- ❑ Not be extended
- ❑ No opinion

Please add your comments her

Q6. Do you agree that the PSPOs in the other wards should be extended for a further 3 years? *

- ❑ Yes, remain in place
- ❑ Be varied further (please explain below)
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion

Any comments please state her

Q8. Have you personally experienced any of the following anti-social behaviour incidents related to the consumption of alcohol in Haringey in the last 12 months? Please tick all that apply *

- ❑ Adults drinking alcohol
- ❑ Young people drinking alcohol
- ❑ Threatening or intimidating behaviour by adults
- ❑ Threatening or intimidating behaviour by young people
- ❑ Noisy disturbance by adults who have been drinking alcohol
- ❑ Noisy disturbance by young people who have been drinking alcohol
- ❑ Alcohol litter in the street or park, estate
- ❑ Have not experienced any of the above
- ❑ Prefer not to say

Q9. I am responding to this consultation as a:

- ❑ Resident
- ❑ Person who works in the borough
- ❑ A visitor to the borough
- ❑ Local business
- ❑ Councillor
- ❑ Representative of a community group or voluntary group

About You

We would be grateful if you could take the time to complete and return this form.

By collecting information on diversity, it helps us better understand the profile and characteristics of those living and using services provided by Haringey Council. We have a duty to pay due regard in all our actions, operations, and decisions to eliminate discrimination, advance equality of opportunities and foster good relations between all groups of people.

The information you provide on this form is non-attributable to individuals and will be held in the strictest confidence to be used only for the purpose stated above.

Please go through it and tick all the categories that most accurately describe you.

What is your age?

- ❑ 16-24
- ❑ 25-44
- ❑ 45-64
- ❑ 65+
- ❑ Prefer not to say

Disability

In order to be able to identify and respond to specific needs, it is important that we gain an understanding of disabilities and long-term conditions.

Do you have any of the following conditions which have lasted or expected to last for at least 12 months?

- o No disabilities
- o Blindness or partial loss of sight
- o Learning disability
- o Physical disability
- o Mental ill health
- o Long term illness or condition
- o Developmental disorder
- o Deafness or partial loss of hearing

Any other disabilities, please write in her

What is your country of birth?

Ethnicity (Please tick the box that best describes your ethnic group)

White

- cEnglish, Welsh, Scottish, N Irish, British
- cIrish
- cGypsy or Irish Traveller

Any other white background, please tell us h

Black / African / Caribbean / Black British

- o African
- o Caribbean

Any other Black / African / Caribbean / Black British ethnic background, please write

Mixed / multiple ethnic backgrounds
- White and Black Caribbean
- White and Black African
- White and Asian

Any other mixed/multiple ethnic background, please write in here:

Asian / Asian British
- Indian
- Pakistani
- Bangladeshi
- Chinese

Any other Asian / Asian British ethnic background, please write in below:

Any other ethnic group
- Arab

Any other ethnic group, please write in:

At birth, were you described as: (Please tick one option)

- Male
- Female
- Intersex
- Prefer not to say

Which of the following describes how you think of yourself? (Please tick one option)
- Male
- Female

In another way, please write here:

What is your religion? This question is voluntary. Please tick as appropriate:

- No religion
- Buddhist
- Christian (including Church of England, Catholic, Protestant and all other Christian denominations)
- Hindu
- Jewish
- Muslim
- Sikh

Any other religion, please write in below:

Which of the following options best describes how you think of yourself?

- oHeterosexual or straight
- oGay or lesbian
- oBisexual
- oOther
- oPrefer not to say

Pregnancy and maternity: Are you pregnant? (Please tick one box)

- oYes
- oNo
- oPrefer not to say

Have you had a baby in the last 12 months? (Please tick one box)

- oYes
- oNo
- oPrefer not to say

What is your legal marital or civil partnership status? Please tick one box

- o Never married and never registered a civil partnership
- o Married or in a civil partnership
- o Widowed or surviving partner from a civil partnership
- o Divorced or legally dissolved from a civil partnership
- o Separated but still legally married or in a civil partnership

Are you a refugee or an asylum seeker? Please tick one box

- o A Refugee
- o An Asylum Seeker

If so, what country or region are you a refugee/asylum seeker from?

What is your main language?

- o English

Other, please write here (including British Sign Language):

Thank you for completing this survey

Consultation on Dog Control Public Space Protection Order 2020

You can read more about the Haringey Data Protection and Privacy Statement; https://www.haringey.gov.uk/contact/privacy-statement or see the attached sheet outlining this information at the end of this consultation document.

*** = response required**

Are you a Haringey resident? *
- ❑ Yes
- ❑ No

Are you a dog owner? * (only tick one box)
- ❑ Yes
- ❑ No
- ❑ Previously owned a dog
- ❑ Thinking of getting a dog

Fouling of land by dogs

It is a condition that dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access. Do you think that this condition should* (only tick one box)
- ❑ Remain in place
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion
- ❑ Be varied (please explain below)

Dogs excluded

Dogs are excluded from fenced play areas set aside for children and marked sports pitches when in use. The full list is outlined in the Order. Do you think this condition should* (only tick one box)
- ❑ Remain in place
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion
- ❑ Be varied (please explain below)

Dogs on leads

Dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare* (only tick one box)

- ❑ Remain in place
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion
- ❑ Be varied (please explain below)

Dogs on lead by direction

It is a condition that dog owners put their dog on a lead when directed to do so by an authorised officer. This applies to any land to which the public have access and where a dog is considered to be out of control. Do you think this condition should* (only tick one box)

- ❑ Remain in place
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion
- ❑ Be varied (please explain below)

Maximum number of dogs

The maximum number of dogs that can be walked by one person is six (this applies to any land open to the air to which the public have access). Do you think this condition should* (only tick one box)

- ❑ Remain in place
- ❑ Be discharged (ended as no longer needed)
- ❑ No opinion
- ❑ Be varied (please explain below)

Do you have any other ideas on how we can improve dog control in Haringey? Please let us know your idea/s in the box below

Are you responding to this consultation as a:

- ❑ Resident
- ❑ Business
- ❑ Organisation (please state the name of your organisation below)

About You

We would be grateful if you could take the time to complete and return this form.

By collecting information on diversity, it helps us better understand the profile and characteristics of those living and using services provided by Haringey Council. We have a duty to pay due regard in all our actions, operations, and decisions to eliminate discrimination, advance equality of opportunities and foster good relations between all groups of people.

The information you provide on this form is non-attributable to individuals and will be held in the strictest confidence to be used only for the purpose stated above.

Please go through it and tick all the categories that most accurately describe you.

What is your age?

- ❑ 16-24
- ❑ 25-44
- ❑ 45-64
- ❑ 65+
- ❑ Prefer not to say

Disability

In order to be able to identify and respond to specific needs, it is important that we gain an understanding of disabilities and long-term conditions.

Do you have any of the following conditions which have lasted or expected to last for at least 12 months? Tick all that apply)

- o No disabilities
- o Blindness or partial loss of sight
- o Learning disability
- o Physical disability
- o Mental ill health
- o Long term illness or condition
- o Developmental disorder
- o Deafness or partial loss of hearing

Ethnicity (Please tick the box that best describes your ethnic group)

White

- cEnglish, Welsh, Scottish, N Irish, British
- cIrish
- cGypsy or Irish Traveller

Any other white background, please tell us more:

Black / African / Caribbean / Black British

- African
- Caribbean

Any other Black / African / Caribbean / Black British ethnic background, please write

Mixed / multiple ethnic backgrounds

- cWhite and Black Caribbean
- cWhite and Black African
- cWhite and Asian

Any other mixed/multiple ethnic background, please write in here:

Asian / Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese

Any other Asian / Asian British ethnic background, please write in below:

Any other ethnic group

- Arab

Any other ethnic group, please write in:

At birth, were you described as: (Please tick one option)

- Male
- Female
- Intersex
- Prefer not to say

Which of the following describes how you think of yourself? (Please tick one option)

- Male
- Female

In another way, please write here:

What is your religion? This question is voluntary. Please tick as appropriate:

- o No religion
- o Buddhist
- o Christian (including Church of England, Catholic, Protestant and all other Christian denominations)
- o Hindu
- o Jewish
- o Muslim
- o Sikh

Any other religion, please write in below: [ ]

Which of the following options best describes how you think of yourself?

- oHeterosexual or straight
- oGay or lesbian
- oBisexual
- oOther
- oPrefer not to say

Pregnancy and maternity: Are you pregnant? (Please tick one box)

- oYes
- oNo
- oPrefer not to say

Have you had a baby in the last 12 months? (Please tick one box)

- oYes
- oNo
- oPrefer not to say

What is your legal marital or civil partnership status? (Please tick one box)

- o Never married and never registered a civil partnership
- o Married or in a civil partnership
- o Widowed or surviving partner from a civil partnership
- o Divorced or legally dissolved from a civil partnership
- o Separated but still legally married or in a civil partnership

Are you a refugee or an asylum seeker? Please tick one box

- o A Refugee
- o An Asylum Seeker

If so, what country or region are you a refugee/asylum seeker from?

[ ]

What is your main language?

- o English

Other, please write here (including British Sign Language):

[ ]

Thank you for completing this survey

Consultation on Dog Control Public Space Protection Order (PSPO) NEW REQUIREMENT 2020

You can read more about the Haringey Data Protection and Privacy Statement; https://www.haringey.gov.uk/contact/privacy-statement or see the attached sheet outlining this information at the end of this consultation document.

Most dog owners are responsible and clean up after their dog. However, a minority of irresponsible dog owners fail to clean up after their dog. We are therefore consulting on a new requirement. It will require **"A person in charge of a dog on land to which this order applies to produce on request a means or device to pick up dog faeces deposited by that dog".**

Nothing in this requirement applies to a person who:

a) **is registered as a blind person in a register compiled under Section 29 of the National Assistance Act 1948 or**
b) **has a disability which affects his/her mobility, manual dexterity, physical coordination or ability to lift, carry, or otherwise move everyday objects, in respect of a dog trained by a "prescribed charity" and upon which he/she relies for assistance**

Q1. Are you a Haringey resident? *

Yes ❑
No ❑

Q2. Are you a dog owner? * (only tick one box)

Yes ❑
No ❑
Previously owned a dog ❑
Thinking of getting a dog ❑

Q3. Person in charge of a dog can pick up dog faeces (poo) using dog poop bags, other bags, pooper scooper or other means.
Should a person in charge of a dog carry a means or device to pick up dog faeces? *

Yes ❑
No ❑
No opinion ❑

If you wish to give a reason for your answer, please complete the text box below.

About You

We would be grateful if you could take the time to complete and return this form.

By collecting information on diversity, it helps us better understand the profile and characteristics of those living and using services provided by Haringey Council. We have a duty to pay due regard in all our actions, operations, and decisions to eliminate discrimination, advance equality of opportunities and foster good relations between all groups of people.

The information you provide on this form is non-attributable to individuals and will be held in the strictest confidence to be used only for the purpose stated above.

Please go through it and tick all the categories that most accurately describe you.

What is your age?

- ❑ 16-24
- ❑ 25-44
- ❑ 45-64
- ❑ 65+
- ❑ Prefer not to say

Disability

In order to be able to identify and respond to specific needs, it is important that we gain an understanding of disabilities and long-term conditions.

Do you have any of the following conditions which have lasted or expected to last for at least 12 months?

- o No disabilities
- o Blindness or partial loss of sight
- o Learning disability
- o Physical disability
- o Mental ill health
- o Long term illness or condition
- o Developmental disorder
- o Deafness or partial loss of hearing

Any other disabilities, please write in her

What is your country of birth?

Ethnicity (Please tick the box that best describes your ethnic group)

White

- cEnglish, Welsh, Scottish, N Irish, British
- cIrish
- cGypsy or Irish Traveller

Any other white background, please tell us he

Black / African / Caribbean / Black British

- o African

- Caribbean

Any other Black / African / Caribbean / Black British ethnic background, please write

Mixed / multiple ethnic backgrounds

- White and Black Caribbean
- White and Black African
- White and Asian

Any other mixed/multiple ethnic background, please write in here:

Asian / Asian British

- Indian
- Pakistani
- Bangladeshi
- Chinese

Any other Asian / Asian British ethnic background, please write in below:

Any other ethnic group

- Arab

Any other ethnic group, please write in:

At birth, were you described as: (Please tick one option)

- Male
- Female
- Intersex
- Prefer not to say

Which of the following describes how you think of yourself? (Please tick one option)

- Male
- Female

In another way, please write here:

What is your religion? This question is voluntary. Please tick as appropriate:

- No religion
- Buddhist
- Christian (including Church of England, Catholic, Protestant and all other Christian denominations)
- Hindu
- Jewish
- Muslim

- Sikh

Any other religion, please write in below

Which of the following options best describes how you think of yourself?

- Heterosexual or straight
- Gay or lesbian
- Bisexual
- Other
- Prefer not to say

Pregnancy and maternity: Are you pregnant? (Please tick one box)

- Yes
- No
- Prefer not to say

Have you had a baby in the last 12 months? (Please tick one box)

- Yes
- No
- Prefer not to say

What is your legal marital or civil partnership status? Please tick one box

- Never married and never registered a civil partnership
- Married or in a civil partnership
- Widowed or surviving partner from a civil partnership
- Divorced or legally dissolved from a civil partnership
- Separated but still legally married or in a civil partnership

Are you a refugee or an asylum seeker? Please tick one box

- A Refugee
- An Asylum Seeker

If so, what country or region are you a refugee/asylum seeker from?

What is your main language?

- English

Other, please write here (including British Sign Language):

Thank you for completing this survey


Public Space Protection Order
Consultation
Have your say on
Dog & Alcohol Control Public Space Protection Orders
Tackling issues associated with alcohol and irresponsible dog owners
Consultation 7th July 2020 to 17th August 2020
www.haringey.gov.uk/pspo-2020
Haringey
LONDON

Environment & Neighbourhoods
Director – Stephen McDonnell

Haringey LONDON

All Residents
London Borough of Haringey

Date: 1st July 2020
Your ref:
Our ref: PSPO/Residents

Dear Resident,

Anti-Social Behaviour Crime and Policing Act 2014
Consultation on a proposed extension of Public Space Protection Orders (PSPO) - Dog Control & Alcohol Control

I am writing to seek resident views on the Council's proposal to extend Public Space Protection Orders for a further three years.

Dog Control Public Space Protection Order
This Order is intended to promote responsible dog ownership. The Order will require a person in charge of a dog to clean up after their dog. It will also give the council and Police Officers powers to direct an owner to place a dog which is out of control on a lead. The Order will require dogs to be on leads in sensitive areas such as burial grounds and peace gardens and exclude dogs from fenced children's play areas. In addition to this we are also consulting on the number of dogs that one person can walk.

There is a separate consultation where we are seeking your views on a new requirement, which would require a person in charge of a dog to carry bags or a means to pick up dog faeces.

Alcohol Public Space Protection Orders
We are seeking the views of all residents on the proposal to extend eleven Public Space Protection Orders in regards to the control of alcohol. These Orders prohibit people drinking in a public place or carrying alcohol in open cans in the restricted areas. We are also seeking the views of residents living in the Woodside Ward on the extension of the Woodside Ward PSPO.

Details of the Orders, the ward locations and consultation forms can be found on the Council's website. We hope to consult widely and I would urge all residents to complete the online consultation forms which can be found on the Council's website using the attached link www.haringey.gov.uk/pspo-2020

This will enable us to take your views into consideration.

This consultation will take place from the **7th July 2020 to the 17th August 2020.**

Yours faithfully,

Allison Pibworth
ASB Manager (North)

Enforcement Team
Haringey Council
PO Box 51452
London N22 8HQ

T 020 8489 4620
E Allison.pibworth@haringey.gov.uk

Environment & Neighbourhoods
Director – Stephen McDonnell

Haringey LONDON

All Licensed Premises
London Borough of Haringey

Date: 1st July 2020
Your ref:
Our ref: PSPO/Licensed Premises

Dear Licensee,

Anti-Social Behaviour Crime and Policing Act 2014
Consultation on a Proposal to extend a Public Space Protection Order (PSPO) - Alcohol Control

I am writing to seek your views, on the Council's Proposal to extend eleven Public Space Protection Orders for a further three years aimed at restricting the consumption of alcohol in a public place. The PSPO also prohibits individuals from carrying alcohol in open cans within the restricted area.

A PSPO cannot be used to restrict the consumption of alcohol where the premises or its curtilage (a beer garden) or pavement area is licensed for the supply of alcohol.

The PSPO will not affect events which take place in a public place which have been authorised by a premises licence or a temporary event notice.

However, a person could risk prosecution if they strayed beyond the legal boundary of a licensed premises or a pavement licence and they do not stop drinking if asked to do so by those empowered to enforce the Order.
There is new legislation, The Business and Planning Act 2020 which allows for a new "Pavement Licence" to make it easier for premises serving food and drink such as bars, restaurants and pubs to seat and serve customers outdoors. The licensee will still be responsible to ensure that customers do not cause nuisance or breach the terms of the licence. The PSPO may be enforced if customers of a licensed premises engage in anti-social behaviour, or are street drinking outside of the licensed hours. This legislation has been specifically put in place to assist licensed premises during the COVID-19 pandemic until 30 September 2021 unless extended by the Secretary of State after which the terms of the PSPO would be in force in regards to street drinking at any time.

Details of Orders, the ward locations and consultation forms can be found on the Council's website. We hope to consult widely and we are urging all interested parties to submit their views by completing the online consultation form by using the attached link www.haringey.gov.uk/pspo-2020 We hope you will take the time to complete the consultation.

The consultation will take place **7th July 2020 to the 17th August 2020.**

Yours faithfully,

Allison Pibworth
ASB Manager (North)

EQUALITY IMPACT ASSESSMENT

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 people who do not
- Foster food relations between people who share those characteristics and people who do not

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.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Public Spaces Protection Order Alcohol & Dog Control
Service area	Enforcement Services – Environment & Neighbourhoods
Officer completing assessment	Joan Appavoo
Equalities/ HR Advisor	Louise Hopton-Beatty
Cabinet meeting date (if applicable)	13 October 2020
Director/Assistant Director	Stephen McDonnell
2. Summary of the proposal *Please outline in no more than 3 paragraphs*	

- *The proposal which is being assessed*
- *The key stakeholders who may be affected by the policy or proposal*
- *The decision-making route being taken*

The existing Public Space Protection Orders (PSPOs) for Alcohol and Dog Control expire on the 19th October 2020. The Cabinet are being asked for permission to:

a) Extend the 11 PSPOs for the control of alcohol until October 2023
b) Extend the boundary of the Woodside PSPO to include Lordship Lane, Chapmans Green Park and the surrounding roads.
c) Extend the PSPO for Dog Control until October 2023 (continuing to cover the whole borough)
d) Dog owners are required to - produce a device or other means for removing dog faeces when requested by an officer (known as the new requirement order).

<u>The terms of the PSPOs in relation to Dog Control are outlined below</u>:

- Dog Fouling - it will be an offence not to clean up after your dog (borough wide)
- Dogs on Leads - cemeteries, car parks, open spaces and parks less than half a hectare
- Dogs on Leads by direction - a dog is to be placed on a lead when directed to do so by an authorised officer. The owner of a dog can only be instructed to put their dog on a lead if the dog is causing a nuisance to members of the public, worrying other dogs or animals
- Dog exclusion - dogs will be excluded from children's play areas, playgrounds, ball courts, pool areas, marked sports pitches and games areas.
- Dogs (Specified Maximum) - the number of dogs that can be walked by one person will be limited to six
- A new requirement will require a person in charge of a dog to produce a device or other means for removing dog faeces when requested by an officer.

<u>In terms of the PSPOs related to alcohol controls: -</u>

- The following wards currently have Orders in place: Bounds Green, Bruce Grove, Harringay, Noel Park, Northumberland Park, St Ann's, Seven sisters, Tottenham Green, Tottenham Hale, West Green and Woodside.
- The PSPO within each ward will not affect pubs, restaurants and off licences or areas covered by a temporary event notice
- The PSPO cannot ban the drinking of alcohol in a public space, the offence is failing to comply with an officer's request within the restricted area of the PSPO to stop drinking and/or surrender alcohol. This criminal offence can be dealt with by issuing a fixed penalty notice or a summons to court.

The penalties for breach either the Alcohol or Dog Control PSPOs is a fixed penalty of £100.00 or a maximum fine of £1000.00 on conviction.

The PSPOs will assist the Council and the police to tackle anti-social behaviour, resulting in a reduction in individuals engaging in anti-social behaviour such as, that arising from the consumption of alcohol. It will also ensure that dog owners behave responsibly by

cleaning up after their dog and ensuring that these are kept under control, so they do not cause a nuisance to members of the public or other dogs and animals.

The PSPO would apply to all individuals committing antisocial behaviour within the designated area, without discrimination.

However, there are exemptions regarding dog fouling - a person who is registered blind or who has a disability which affects their mobility and who is registered disabled is exempt from cleaning up after their dog. In regard to dog exclusion areas, persons who are registered blind or who have an assistance dog and who are registered with a known charity will be exempt and will be able to enter these areas freely.

The decision-making route:

A decision was taken on 10 March 2020 to go out to public consultation on the proposed PSPOs with amendment and additional requirement.

The Council consulted with the public between 7 July 2020 and 18 August 2020. The findings of the public consultation inform the final Cabinet Report and EqIA, which will go to Cabinet on 13th October 2020

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	*Haringey Census 2011* Public Consultation findings	*Staff will not be impacted by the proposal and therefore data is not included.*
Gender Reassignment	*Human Rights Commission national estimate.* Public Consultation findings	
Age	*Haringey Borough Plan EQIA data* *Haringey Census 2011* Public Consultation findings	
Disability	*Haringey Borough Plan EQIA data* *Haringey Census 2011* Public Consultation findings	

Race & Ethnicity	*Haringey Borough Plan EQIA data* *Haringey Census 2011* Public Consultation findings	
Sexual Orientation	Public Consultation findings	
Religion or Belief (or No Belief)	*Haringey Borough Plan EQIA data* *Haringey Census 2011* Public Consultation findings	
Pregnancy & Maternity	Public Consultation findings	
Marriage and Civil Partnership	*Haringey Borough Plan EQIA data* *Haringey Census 2011* Public Consultation findings	

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How do this compare with wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Explain how you will overcome this within the proposal.

Further information on how to do data analysis can be found in the guidance.

Given that the PSPO related to dog control covers the whole borough and 11/19 of the wards are covered by the alcohol related PSPOs, Haringey borough wide data has been used. For the alcohol related PSPO, if there is likely to be a slightly different profile for the 11/19 ward than Haringey as a whole, this has been noted.

Sex

There are slightly more males than females in Haringey 49.6% of residents are female and 50.4% are male, in line with London and national averages.

There were marginal variances to the borough profile in all completed consultation surveys, with slightly more women than men responding to the survey:

- Alcohol control survey - 56.5 % were Female and 42.8% Male
- Dog Control Survey - 58% Female and 42% were male; New Requirement Survey – 58.4 % female and 45.6% Male

Gender Reassignment

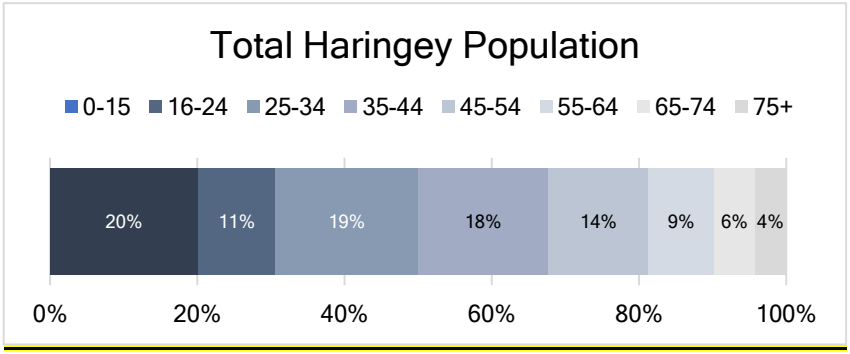
The Borough does not hold local data on gender reassignment. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK[1]. Responds to the consultation surveys were as follows:

[1] https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review

- 2 respondents to alcohol control PSPO survey identified themselves as non-binary. 1 of the 264 female Respondents indicated she was male at birth; and 4 of the 200 male Respondents indicated they were female at birth.
- 2 respondents to dog control PSPO survey identified themselves as non-binary. 1 of the 584 female Respondents indicated they were male at birth; and 4 of the 417 male Respondents indicated they were female at birth.
- 1 respondent identified themselves as non-binary in the dog control PSPO New Requirement survey; 3 of the 263 females Respondents indicated they were male at birth; and 4 of the 205 male Respondents indicated they were female at birth.

Age

Haringey has a relatively young population with 31% of the population being 24 or under and only 10% 65+.



The '24 or under' age group was under-represented amongst the Respondents to all three consultation surveys. The overwhelming majority of responses came from the 25-64 age group.

Of Respondents specifying their age group	Alcohol Control survey	Dog control Survey	New requirement
16-24 alcohol	1.6%	0.9%	0.4%
25-44	39.8%	31.0%	30.6%
45-64	37.8%	40.5%	44.9%
65+	17.2%	23.0%	21.3%
Prefer not to say	3.6%	4.6%	2.8%

Disability

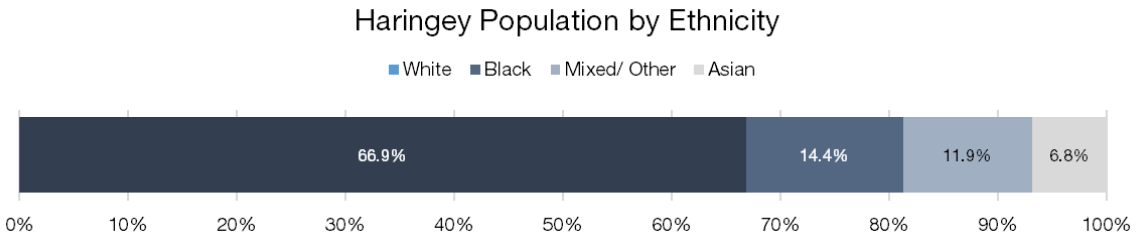
- Over 19,500 people aged 16 to 64 in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64.
- In Haringey 4,500 people have a serious physical disability; 15,700 adults have a moderate or severe hearing impairment; and almost 5,000 people have sight loss which impacts on daily life.
- An estimated 5,700 Haringey residents aged 14 and over are estimated to have a learning disability, and around 2,100 residents are estimated to have autism.

Consultation Surveys data

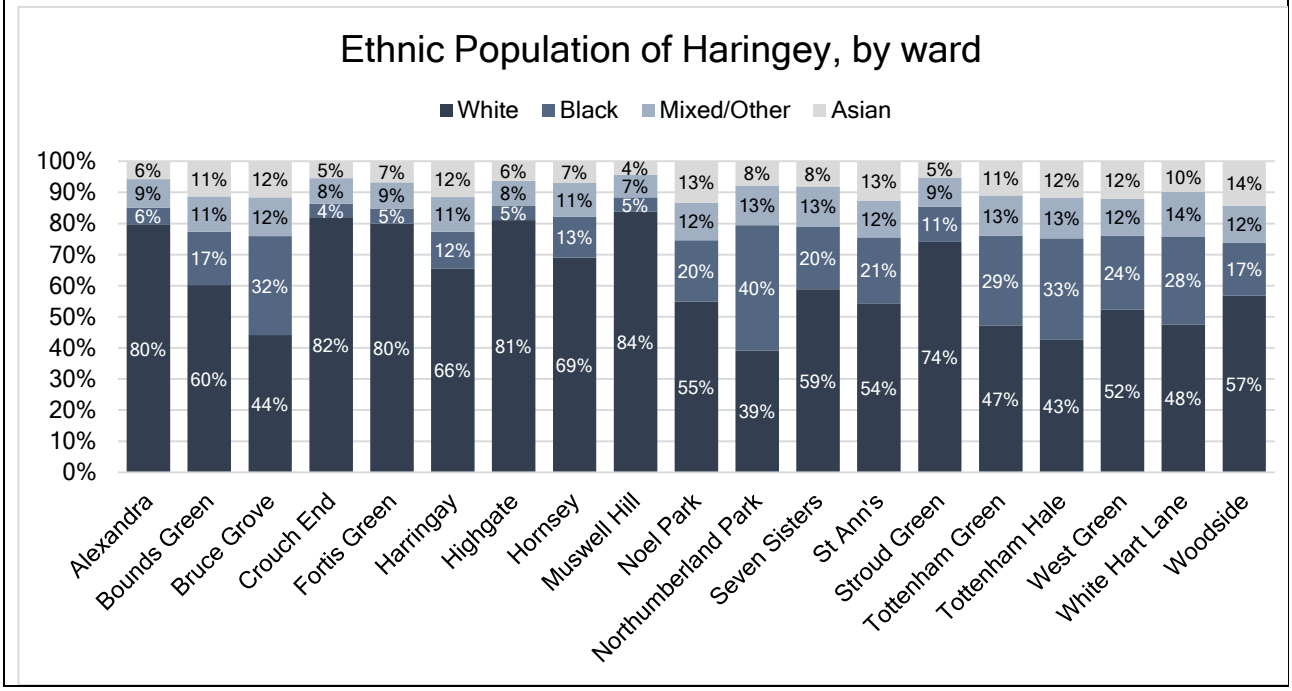
Of Respondents specifying their disability status	Alcohol Control Survey	Dog Control Survey	New Requirement
No disabilities	73.3%	78.1%	68.1%
Disability	12.3%	6.5%	16.3%
No response	14.4%	15.4%	15.6%
Of the Respondents stating that they had a disability, the following conditions were identified			
Blindness or partial loss of sight	4.1%	5.1%	9.0%
Learning disability	2.4%	2.3%	2.0%
Physical disability	17.1%	21.0%	16.0%
Mental ill health	18.7%	16.5%	14.0%
Long term illness or condition	36.6%	31.3%	35.0%
Developmental disorder	2.4%	1.7%	2.0%
Deafness or partial loss of hearing	12.2%	15.9%	16.0%
Any other disabilities	6.5%	6.3%	6.0%

Race and Ethnicity

People of White and White Other ethnicity make up the largest proportion of Haringey's population, followed by those of Black, Mixed/other and Asian ethnicity.



However, this differs greatly by ward.



It is recognised that the wards covered by the Alcohol PSPO typically have higher levels of BAME residents.

Consultation Surveys data

How would you describe your ethnic group?	Alcohol Control Survey	Dog Control Survey	New Requirement Survey
White	62%	70.20%	84.8%
Black / African / Caribbean / Black British	28%	17.80%	4.0%
Mixed / multiple ethnic backgrounds	3.9%	4.70%	4.2%
Any other Asian / Asian British ethnic background	5.2%	5.10%	5.4%
Any other ethnic group	0.9%	2.4%	1.4%

Data percentages do not total 100%, as it is noted that some Respondents selected more than one ethnic group when responding to the surveys. The 'Black/African/Caribbean/Black British' category is likely to be significantly flawed, as the vast majority of these Respondents in the Alcohol Control and Dog Control surveys, also categorised themselves within one or more of the other ethnic categories.

Sexual Orientation

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. However, the ONS estimates that 3.7% of Haringey's population are lesbian, gay or bisexual (LGB), which is the 15th largest LGB community in the country.

Consultation Surveys data

Of Respondents specifying their sexual orientation	Alcohol Control	Dog Control	New Requirement
Heterosexual or straight	72.7%	80.0%	80.6%
Gay or lesbian	5.4%	4.8%	8.0%
Bisexual	10.8%	2.1%	1.1%
Other	1.9%	0.7%	0.6%
Prefer not to say	9.2%	12.4%	9.7%

There appears to be good representation of this protected characteristic among consultation Respondents; proportions reflecting Borough population data

Religion or Belief

Haringey is one of the most religiously diverse places in the UK. The most common religion was Christianity, accounting for 45% of residents, less than London (48.4) and less than England (59.4%). The next most common religions were Muslim (14.3%) – higher than London (12.3%) - and Jewish (3%). Haringey had a lower percentage of residents who were Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively). A quarter of Haringey residents stated that they did not have a religion, higher than London (20.7%).

A significantly high proportion of Respondents to all three consultation surveys identified as having 'no religion', which does not reflect the current borough data. It is also noted that there was a lower response from the Muslim community within the borough and to a lesser extent the Jewish Community.

Of Respondents specifying their Religion of belief	Alcohol Control	Dog Control	New Requirement
No religion	59.7%	60.5%	61.7%
Buddhist	18.9%	1.4%	2.0%
Christianity	16.9%	29.7%	28.7%
Hindu	0.4%	1.1%	1.5%
Jewish	0.9%	3.0%	1.5%
Muslim	1.6%	2.9%	2.0%
Sikh	0.4%	0.2%	0.0%
Any other Religion	1.3%	1.1%	2.6%

Pregnancy and Maternity

The General Fertility Rate (GFR) is the number of live births per 1,000 women aged 15-44. In 2018, Haringey's rate of 59.6 was broadly in line with the London average of 60.1.

Consultation Surveys data

Of the Respondents specifying if they were pregnant or not	Alcohol Control	Dog Control	New Requirement
Yes	1.2%	1.2%	0.2%
No	92.9%	93.0%	93.8%
Prefer not to say	5.9%	5.8%	5.9%
Of the Respondents specifying if they have had a baby in the last 12 months			
Yes	0.0%	3.0%	3.4%
No	94.6%	90.8%	90.7%
Prefer not to say	5.4%	6.2%	5.9%

Marriage and Civil Partnership

Haringey has relatively low levels of marriages at 33.3%, compared to England average of 46.6% and London average of 39.8%.

Haringey has a higher proportion of couples in a registered same sex civil partnership than England and London. 0.6% (or 1,191 residents), compared to 0.2% for England and 0.4% for London.

All groups within this protected characteristic were represented among consultation Respondents. The proportion of persons in the 'Married or in civil partnership' category was slightly higher than the borough and London averages

Of Respondents specifying their Marital or Civil Partnership status	Alcohol Control	Dog Control	New Requirement
Never married and never registered a civil partnership	40.8%	32.9%	34.5%
Married or in a civil partnership	45.1%	52.0%	51.0%
Widowed or surviving partner from a civil partnership	3.6%	4.6%	3.1%
Divorced or legally dissolved from a civil partnership	9.2%	9.5%	10.5%
Separated but still legally married or in a civil partnership	1.3%	1.0%	0.9%

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

Please outline which groups you may target and how you will have targeted them

Further information on consultation is contained within accompanying EqIA guidance

A statutory consultation was undertaken for 6 weeks in the period 7 July 2020 to 18 August 2020. The consultation comprised of three separate surveys.

There were 2610 responses to the consultation and 40 additional emails and letters. Respondents were able to complete one or all three of the surveys.

1. Survey relating to the extension of the 11 Alcohol Control PSPOs for a further three years and the proposal to extend the boundary of the Woodside Ward Alcohol PSPO
2. Survey relating to the extension of the borough wide Dog Control PSPO for a further three years and seeking public opinion on whether or not the specific conditions of the PSPO should remain in place or be discharged: -
    i. Condition that dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access.
    ii. Condition that dogs are excluded from fenced play areas set aside for children and marked sports pitches when in use.
    iii. Condition that dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare
    iv. Condition that dog owners put their dog on a lead when directed to do so by an authorised officer. This applies to any land to which the public have access and where a dog is considered to be out of control.
    v. Condition that the maximum number of dogs that can be walked by one person is six (this applies to any land open to the air to which the public have access).
3. Survey relating to the proposal to add a new requirement to the Dog Control PSPO which would require “a person in charge of a dog on land to which the Order applies to produce on request a means or device to pick up dog faeces deposited by that dog."

All three surveys asked those participating in the consultation to provide equalities data in line with protected characteristics identified within the Equality Act 2010.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

Explain how will the consultation's findings will shape and inform your proposal and the decision making process, and any modifications made?

Alcohol Control PSPO Survey

A considerable majority of all Respondents supported the extension of the current Alcohol Control PSPOs for a further 3 years.

Just over half the Respondents agreed with the proposal that the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park (57%); it is noted that 34.3% of respondents had no opinion in respect of this point. Hence of those expressing an opinion 88% were in favour of extending the Woodside Ward PSPO.

Of the Respondents supporting the discharge of the PSPOs or not supporting the extending Woodside ward PSPO, 'other comments' covered a variety of different concerns: no problem, unfair, violation of individual rights, conflicts with COVID restrictions, attack on social class. There were no definable patterns based on protected characteristics of those completing the survey.

SEX

Females were more likely to be supportive of the PSPO.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	Not be Extended	No Opinion
Male	77.0%	6.0%	13.0%	4.0%
Female	90.2%	2.3%	4.5%	3.0%

This was also reflected in the responses to the proposed extension of the Woodside Ward PSPO, although the gap between males and females is slightly smaller.

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

	YES, be extended	Be Varied	Not be extended	No Opinion
Male	56.5%	2.5%	6.0%	35.0%
Female	59.8%	1.5%	4.2%	34.5%

GENDER REASSIGNMENT

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?				
	YES, be extended	Be Varied	Not be extended	No Opinion
5 Respondents identifying as having a different sex to that identified at birth	60% (3)	20% (1)	20% (1)	-

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?				
	YES, be extended	Be Varied	Not be extended	No Opinion
5 Respondents identifying as having a different sex to that identified at birth	40% (2)	20% (1)	20% (1)	20% (1)

The number of Respondents who responded that their gender was different to that which was identified at birth is small. However, the data would suggest a greater proportion were in favour of the PSPO proposals.

AGE

Increase in age corresponded with an increase in support for the PSPO remaining in place, 65+ being the most supportive. It should be noted that equal numbers of 16-24 year olds supported the PSPO to remain in place as wanted it to be stopped.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	Not be extended	No Opinion
16-24	41.7%	8.3%	41.7%	8.3%
25-44	79.9%	2.6%	12.3%	5.2%
45-64	84.6%	6.5%	6.5%	2.4%
65+	91.7%	4.5%	2.3%	1.5%

This is also broadly reflected in the Woodside Ward extension, but with less of a range between the age groups.

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

	YES, be Extended	Be Varied	Not be extended	No Opinion
16-24	41.7%	0.0%	33.3%	25.0%
25-44	58.1%	0.6%	9.4%	31.8%
45-64	58.6%	3.4%	3.8%	34.2%
65+	58.6%	2.3%	0.8%	38.3%

DISABILITY

The same percentage of people with and without disabilities wanted the PSPO to remain in place (83%). Of those who wanted the PSPO to be stopped, slightly more identified as having a disability (11% compared to 8% for no disability). Those identifying as no disability were slightly more likely to say they had no opinion or wanted it varied.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	Not be extended	No Opinion
No Disability	83%	5%	8%	4%
Disability	83%	3%	11%	3%

Disabled people were more likely to support the extension of the Woodside Ward PSPO, but also slightly more likely to not want it extended or varied (and these likely to show no opinion).

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

	YES, be Extended	Be Varied	Not be extended	No Opinion
No Disability	57%	1%	6%	36%
Disability	61%	3%	8%	28%

RACE & ETHNICITY

The vast majority of respondents from all ethnicities were in favour of the PSPO. People identifying as other ethnic group and other Asian / Asian British ethnic background were the most supportive. With people identifying as from mixed / multiple ethnic backgrounds showing the highest response supporting the stopping of the PSPO.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	No be Extended	No Opinion
White	83.6%	5.4%	7.8%	3.3%
Black / African / Caribbean / Black British	79.1%	4.7%	11.4%	4.7%
Mixed / multiple ethnic backgrounds	80.8%	3.8%	15.4%	0.0%
Any other Asian / Asian British ethnic background	94.6%	-	2.7%	2.7%
Any other ethnic group	100%	-	-	-

The responses to the Woodside Extension were broadly comparable.

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

	YES, be extended	Be Varied	Not be extended	No Opinion
White	54.3%	3.0%	4.2%	38.5%
Black / African / Caribbean / Black British	55.5%	1.4%	9.5%	33.6%
Mixed / multiple ethnic backgrounds	69.2%	-	11.5%	19.2%
Any other Asian / Asian British ethnic background	75.7%	-	-	24.3%
Any other ethnic group	87.5%	-	-	12.5%

SEXUAL ORIENTATION

Of the responses which identified sexual orientation, Gay and Lesbian were least likely to be supportive (although still over 70% were in support) and were most likely to say they wanted the PSPO to be stopped.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	Not be Extended	No Opinion
Heterosexual or straight	84.7%	3.6%	7.8%	3.8%
Gay or lesbian	70.3%	2.7%	13.5%	13.5%
Bisexual	82.4%	5.4%	10.8%	1.4%
Other	84.6%	-	7.7%	7.7%

There is a slightly different profile of responses to the Woodside Ward extension question. While those who identified as Gay or Lesbian were still least likely to support the PSPO to be extended, they were also the least likely to say they didn't want it extended, with a higher proportion having no option.

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

	YES, be Extended	Be Varied	Not be extended	No Opinion
Heterosexual or straight	57.0%	1.8%	5.6%	35.5%
Gay or lesbian	56.8%	-	5.4%	37.8%
Bisexual	68.9%	1.4%	6.8%	23.0%
Other	84.6%	-	7.7%	15.4%

RELIGION OR BELIEF

Those with no religion were least likely to be supportive of the PSPO remaining in place and more likely to want it to be stopped, although over 78% still supported it. Those identifying as Hindu, Jewish, Muslim and Sikh all had 100% support.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	Not Be Extended	No Opinion
No religion	78.7%	4.8%	12.0%	4.5%
Buddhist	83.3%	4.5%	6.8%	5.3%
Christian	94.1%	4.2%	0.8%	0.8%
Hindu	100%	-	-	-
Jewish	100%	-	-	-
Muslim	100%	-	-	-
Sikh	100%	-	-	-

Responses to the Woodside Ward extension were broadly comparable, although there was a shift in a number of groups from being supportive to having no opinion. This may reflect the composition of population of the area affected.

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

	YES, be Extended	Be Varied	Not be extended	No Opinion
No religion	54.1%	1.2%	7.4%	37.3%
Buddhist	59.1%	0.8%	6.1%	34.1%
Christian	71.2%	5.1%	-	23.7%
Hindu	100%	-	-	-
Jewish	66.7%	-	-	33.3%
Muslim	90.9%	-	-	9.1%
Sikh	66.7%	-	-	33.3%

PREGNANCY & MATERNITY

1005 of pregnant Respondents agreed that the PSPO should be extended for a further three years. Of the pregnant women expressing a preference 60% agreed with the Woodside Ward PSPO being extended, (40% expressed no opinion). None of the Respondents had had a baby in the last 12 months.

MARRIAGE & CIVIL PARTNERSHIP

Those who were never married or never in a civil partnership were least likely to be supportive (although still over 75% supportive) and more likely to say that they wanted the PSPO to be stopped.

Do you agree that the PSPO where you live, work or visit should be extended for a further 3 years?

	YES, remain in place	Be Varied	Not be Extended	No Opinion
Never married and never registered a civil partnership	75.8%	6.0%	14.8%	3.3%
Married or in a civil partnership	88.6%	3.0%	5.0%	3.5%
Widowed or surviving partner from a civil partnership	93.8%	-	-	6.3%
Divorced or legally dissolved from a civil partnership	90.2%	4.9%	2.4%	2.4%
Separated but still legally married or in a civil partnership	100%	-	-	-

Do you agree that the boundary of the PSPO in the Woodside Ward should be extended down Lordship Lane, to include Chapmans Green Park and periphery roads?

The response to the Woodside Ward extension was comparable.

	YES, be Extended	Be Varied	Not be extended	No Opinion
Never married and never registered a civil partnership	48.9%	2.7%	9.9%	38.5%
Married or in a civil partnership	63.2%	2.0%	1.5%	33.3%
Widowed or surviving partner from a civil partnership	93.8%	-	-	6.3%
Divorced or legally dissolved from a civil partnership	61.0%	-	-	39.0%
Separated but still legally married or in a civil partnership	83.3%	-	-	16.7%

Summary

There was overall support from all groups that shared protected characteristics, for the 11 alcohol control PSPOs to be extended for a further 3 years and for the Woodside Ward to be extended down Lordship Lane, to include Chapmans Green Park and the roads around the periphery of the park. The clearest differences were in relation to age, with older people being much more supportive and sex, with women being more supportive.

Dog Control PSPO Survey

There was overall support from all groups that shared protected characteristics, for the Dog Control PSPO to be extended for a further 3 years. Further details relating to the Dog Control PSPO Survey findings can be found in the full Consultation Report.

To present figures pertaining to groups of each protected characteristic would be complex given the number of conditions and variety of responses, particularly as the number of people seeking the discharge of these conditions was significantly low (as outlined in table below):

Condition	**Respondents seeking to stop this condition**
Dog owners or the person in charge of a dog are required to remove faeces (dog mess) from any land which is open to the air and to which the public have access	0.5%
Dogs be excluded from fenced play areas set aside for children and marked sports pitches when in use	1.3%
Dogs must be on a lead in churchyards, graveyards, highways, grass verges, green space less than half a hectare	2.5%
Dog owners put their dog on a lead when directed to do so by an authorised officer. (This applies to any land to which the public have access and where a dog is considered to be out of control.)	1%
The maximum number of dogs that can be walked by one person is six (this applies to any land open to the air to which the public have access)	1.9%

Dog Control PSPO – New Requirement Survey

There was overwhelming support for the council's proposal to introduce the new requirement to the Dog Control PSPO, that a person in charge of a dog carry a means or

device to pick up dog faeces. There were 614 respondents to this consultation survey and 95.2% who were in favour of this proposal.

SEX

Male and female responses were similar.

	YES	No	No Opinion/Blank
Male	95.6%	3.4%	1.0%
Female	95.4%	3.8%	0.8%

GENDER REASSIGNMENT

	YES	No	No Opinion/Blank
7 Respondents identifying as having a different sex to that identified at birth	86% (6)	14% (1)	-

The number of Respondents who responded that their gender was different to that which was identified at birth is small. However, the data would suggest a greater proportion were in favour of the new requirement for the dog control PSPO.

AGE

Support for the proposal broadly increased with age. There was a 50-50% split among 16-24 year olds.

	YES	No	No Opinion/Blank
16-24	50%	50%	-
25-44	95.1%	3.7%	1.2%
45-64	95.0%	4.2%	0.8%
65+	100%	-	-

DISABILITY

Disabled people were slightly more likely to be supportive of the proposal.

	YES	No	No Opinion/Blank
No Disability	95.5%	0.7%	3.6%
Disability	97.3%	2.7%	-

RACE & ETHNICITY

There were no significant differential preferences based on race & Ethnicity. While people identifying as Black / African / Caribbean / Black British were least likely to be supportive (although still over 85% supportive), there were more likely to say they had no opinion and none stated they opposed to the proposal.

	YES	NO	No Opinion/Blank
White	96.6%	2.8%	0.6%
Black / African / Caribbean / Black British	85.7%	-	14.3%
Mixed / multiple ethnic backgrounds	100%	-	-
Any other Asian / Asian British ethnic background	94.7%	5.3%	-
Any other ethnic group	100%	-	-

SEXUAL ORIENTATION

There were no significant differential preferences based on sexual orientation.

	YES	NO	No Opinion/Blank
Heterosexual or straight	96.5%	2.4%	1.1%
Gay or lesbian	94.6%	5.4%	-
Bisexual	100%	-	-
Other	100%	-	-

RELIGION OR BELIEF

Muslims where least likely to be supportive of the proposal (although still over 88% in support) and most likely to oppose the proposal.

	YES	NO	No Opinion/Blank
No religion	95.8%	3.9%	-
Buddhist	100%	-	-
Christian	95.5%	2.3%	-
Hindu	100%	-	-
Jewish	100%	-	-
Muslim	88.9%	11.1%	-

PREGNANCY & MATERNITY

There were no significant differential preferences based on gender. Only One respondent to this Survey identified as pregnant and they supported the proposal. 14 Respondents identified as having a baby in the last 12 months, of these only 1 opposed the proposal.

MARRIAGE & CIVIL PARTNERSHIP

There were no significant differential preferences based on Marriage or civil partnership. Of the 25 Respondents opposing this proposal 9 identified as married or in a civil partnership, 1 Divorced and 5 Never Married.

	YES, remain in place	Be Varied	No Opinion/Blank
Never married and never registered a civil partnership	96.2%	3.2%	0.6%
Married or in a civil partnership	95.3%	3.9%	0.9%
Widowed or surviving partner from a civil partnership	92.9%	-	7.1%
Divorced or legally dissolved from a civil partnership	97.9%	2.1%	-
Separated but still legally married or in a civil partnership	100%	-	-

Summary

There was overwhelming support for the Council's proposal from all groups that shared protected characteristics, in the response to this Consultation Survey.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

Please explain the likely differential impact on each of the 9 equality strands, whether positive or negative. Where it is anticipated there will be no impact from the proposal, please outline the evidence that supports this conclusion.

Further information on assessing impact on different groups is contained within accompanying EqIA guidance

1. Sex

The intension of the PSPO's are to make residents feel safer by tackling anti-social behaviour and to have a cleaner borough. This will apply to residents regardless of sex.
However, evidence shows that females are more likely to feel unsafe than males especially after dark (Residents Survey 2018). Therefore, the alcohol PSPO is likely to have a greater positive impact on women than men. This is reflected in the responses to the survey. Several Respondents to the Alcohol Survey made 'other comments' pertaining to how the presence of group street drinking was intimidating and made residents (especially women) feel unsafe.

There are no known equality issues in terms of dog control related to sex.

Positive	√	Negative		Neutral impact		Unknown Impact	

2. Gender reassignment

Transgender people, including those going through and having gone through gender reassignment, experience high levels of hate crime and discrimination. Tackling drinking and the associated anti-social behaviour may therefore have a positive impact on this group. No Respondents to the consultation identified as Transgender. A small number of Respondents responded that their gender was different to that which was identified at birth, of these the majority supported the PSPOs suggesting a view that the PSPOs are likely to have a positive impact on this group.

Positive	√	Negative		Neutral impact		Unknown Impact	

3. Age

While safety is a concern for all age groups and therefore the alcohol PSPO should have a positive impact across all ages, older people who responded to the survey were more supportive. There was a high level of response to the consultation surveys from 65+ age group, with additional concerns regarding safety and health and safety concerns. Therefore, the alcohol PSPO could potentially be more positive for older people, providing greater reassurance and protection. It should be noted that less than half the 16-24 year olds were supportive of the proposal, although the number of responses in this category was relatively small.

In general, older people were more support for the Dog Control PSPO and the introduction of special measures. However, it can also be reasonably assumed that young children who are more likely to be playing on the ground are most likely to benefit from reduction of dog fouling. Respondents to the survey cited the negative impact of dog fouling and dogs out of control upon young children.

Positive	√	Negative		Neutral impact		Unknown Impact	

4. Disability

Disabled people are significantly more likely to be victims of crime than non-disabled people. The Alcohol PSPO could have a disproportionately positive impact on many disabled people.

However, it is also recognised that street drinking is likely to be higher among the homeless and that they are more likely to suffer from mental ill-health. Homeless Link (2014) stated that 80% of homeless people in England reported that they had a mental health issue, with 45% having been diagnosed with a mental health condition. It is therefore important and the Council's intention to promote engagement with affected homeless people, or indeed others with mental health conditions, through joined-up/partnership working with relevant support services.

It is recognised that people with mobility problems or visual impairments may find it more difficult to comply with the Dog Control PSPO. Therefore, there are exemptions regarding dog fouling - a person who is registered blind or who has a disability which affects their mobility and who is registered disabled is exempt from cleaning up after their dog. In regard to dog exclusion areas, persons who are registered blind or who have an assistance dog and who are registered with a known charity will be exempt and will be able to enter these areas freely.

Positive	√	Negative		Neutral impact		Unknown Impact	

5. Race and Ethnicity

According to police categorisations, the most common ethnicity of victims of crime in Haringey is White North European (representing 46% of all victims), followed by Black victims (27%) and White South European (16%). All races and ethnicities would be positively impacted by improved safety achieved through tackling anti-social behaviour arising from alcohol consumption in public spaces.

It is recognised that the 11 alcohol PSPOs are in areas with higher BAME populations. These areas have been identified based on the evidence of need, (i.e. reports to Police with an Alcohol / Licensing Nuisance Code and London Ambulance Service alcohol callouts) and not selected based on race or ethnicity.

The Consultation Survey responses included 97 additional comments requesting that Alcohol Control PSPO provisions to be applied to other parts of the borough, particularly in the west of the borough, where there is a higher proportion of white residents. There were also 12 other comments expressing the need for a Borough-wide alcohol control PSPO. It is the Council's intention to make further make further recommendations to Cabinet that consideration is given to a future consultation on the matter of additional Alcohol Control PSPOs, widening existing PSPOs or introducing a borough wide PSPO. Further evidence-based data will be required to support such recommendations at a later date.

There are no known equality issues in terms of dog control related to race and ethnicity.
A wide range of ethnic groups were represented amongst the consultation Respondents.

Positive	√	Negative		Neutral impact		Unknown Impact	

6. Sexual orientation

Lesbian, gay and bisexual people are more likely to experience hate crime and would be assumed to therefore benefit from measures which improved safety. However, it is noticeable that Gay and Lesbian people were less likely to be supportive than other groups. Having said this, supportive was still over 70% and is therefore thought to broadly be positive.

There are no known equality issues in terms of dog control related to sexual orientation.

Positive	√	Negative		Neutral impact		Unknown Impact	

7. Religion or belief (or no belief)

Hate crime can disproportionately impact people from religious communities. For example, in 2017/18 Haringey experience the sharpest increases in Islamophobic (42%) and anti-Semitic (28%) hate crime. Therefore, the alcohol PSPO is likely to positively impact people from religious communities.

There are no known equality issues in terms of dog control related to religion or belief. It is noted that Muslims were less likely to be supportive of the new measures, but that over 88% were still supportive.

Positive	√	Negative		Neutral impact		Unknown Impact	

8. Pregnancy and maternity

There are no known equalities issues related to pregnancy and maternity in relation to this report. All Respondents to the Alcohol Control PSPO who identified as pregnant supported the Council's proposals, suggesting the PSPOs would have a positive impact.
Only one of the 11 respondents to the Dog Control Survey identifying as pregnant favoured the discharge of the dog control PSPO, suggesting again a view that the PSPOs would have a positive impact. In addition, if pregnancy and maternity are a mitigating factor in any breach it will be taken into consideration, to ensure that any enforcement is proportionate, reasonable and fair.

Positive	√	Negative		Neutral impact		Unknown Impact	

9. Marriage and Civil Partnership

Those who have never been married or in a civil partnership were least support of the alcohol PSPO, which may be related to the age profile and younger people being less likely to be supportive. However, over 75% were supportive, so the impact is thought to be positive.

There is no known differential impact in terms of dog control.

Positive	√	Negative		Neutral impact		Unknown Impact	

10. Groups that cross two or more equality strands e.g. young black women

The council recognise that street drinking is prominent amongst the street homeless population, who often have mental health problems and are statistically more like to be male.

Outline the overall impact of the policy for the Public Sector Equality Duty:

- **Could the proposal result in any direct/indirect discrimination for any group that shares the protected characteristics?**
- **Will the proposal help to advance equality of opportunity between groups who share a protected characteristic and those who do not?**
  This includes:
  a) **Remove or minimise disadvantage suffered by persons protected under the Equality Act**
  b) **Take steps to meet the needs of persons protected under the Equality Act that are different from the needs of other groups**

c) Encourage persons protected under the Equality Act to participate in public life or in any other activity in which participation by such persons is disproportionately low

- **Will the proposal help to foster good relations between groups who share a protected characteristic and those who do not?**

Many of the groups with protected characteristics will be positively impacted by the proposal which aims to assist the council in tackling anti-social behaviour and to improve cleanliness.

The local authority recognises that people who are registered blind, have a mobility issue, those with assistance dogs would struggle to comply with the requirements of the Dog Control aspects of the PSPOs. Therefore, these groups have been and will continue to be exempt from prosecution if found to be in breach of the dog control provisions of the PSPOs (as outlined above).

The council also recognise that street drinking is prominent amongst the street homeless population, who are predominantly male and often have mental health problems. Extensive support and intervention are initially undertaken to address alcohol and other related issues through referrals to outreach services; providing individuals with the opportunity to engage in support and rehabilitation, prior to any decision to take any enforcement action.

Ensuring fairness in the application of the PSPO is critical. Currently the Enforcement Team does not hold any data regarding activities relevant to the existing PSPOs, as they are often short interventions and collecting equality data would be disproportionate. There have been no fines or prosecutions under the existing PSPOs (since October 2017). There have been no formal complaints about the existing PSPOs, which has been in place since October 2017. We therefore have no reason to believe that the PSPOs have been applied disproportionately or that any protected group would be disproportionately negatively affected in the future. To ensure this continues, the following actions will take place:

- The authorised officers who will monitor the area and enforce the PSPO have and will continue to consider the needs of the individual and their personal circumstances in order to make an informed, balanced and equitable decision as to the appropriate action to take. This includes completing an Equality Impact Assessment prior to prosecution, during which consideration is given to any vulnerability and support needs, to ensure that any prosecution if proportionate, necessary and fair.
- Officers of the ASB Enforcement Team will keep up to date with any available Equalities training
- Issues & concerns will be regularly discussed in supervisions & at team meetings, to ensure that equality and fairness are fundamental considerations in any decision relating to enforcement
- Anyone issued a fine does have the right of Appeal or right to raise a complaint, which would be investigated and responded to by a senior manager.
- Any abuse of discretion when enforcing the proposed PSPO would be addressed swiftly using appropriate internal procedures, which could include further training or period of monitoring.
- The ASB Enforcement Team will collect equalities data during the period of the extended PSPOs in relation to any breaches (fines issued or resulting prosecutions).

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment? Further information on responding to identified impacts is contained within accompanying EqIA guidance	
Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly set out below the key adjustments you plan to make to the policy. If there are any adverse impacts you cannot mitigate, please provide a compelling reason below	*N*
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale
street drinking is prominent amongst the street homeless population, who statistically more likely to be men, and who often have mental health problems. Therefore this group may experience a negative impact	• *Support & intervention undertaken before considering any enforcement* • *Support & intervention offered alongside any necessary warnings or resulting enforcement* • *Equality Monitoring of reports and enforcement to identify any hot spot areas and arrange Joint operations with homelessness/alcohol support outreach services* • *Engagement in street homelessness partnership to identify and review support & intervention strategies to assist with the*	*ASB Enforcement Managers* ASB Specialist	On-going during life-time of Alcohol Control PSPO

	reduction of street homeless in Haringey		

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

Overall, groups with protected characteristics will be positively impacted by the proposal which aims to assist the council in tackling anti-social behaviour and to improve cleanliness.

The local authority recognises that people who are registered blind, have a mobility issue, those with assistance dogs would struggle to comply with the requirements of the Dog Control aspects of the PSPOs. Therefore, these groups have been and will continue to be exempt from prosecution if found to be in breach of the dog control provisions of the PSPOs.

The council also recognises that street drinking is prominent amongst the street homeless population, who statistically more likely to be men, and who often have mental health problems. Extensive support and intervention are initially undertaken to address alcohol and other related issues through referrals to outreach services; providing individuals with the opportunity to engage in support and rehabilitation, prior to any decision to take any enforcement action.

It is also noted, that while the Alcohol PSPOs covers areas with higher proportions of BAME communities, the location of PSPOs is based on the evidence of need, (i.e. reports to Police with an Alcohol / Licensing Nuisance Code and London Ambulance Service alcohol callouts). The Authority will also be reviewing the potential to expand the PSPO borough wide.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The PSPOs will be monitored regularly throughout the life of the orders to ensure that any equalities issues are dealt with should they arise.

The council will be looking into how best to update its database and recording systems to ensure that equalities can be collected and monitored in relation to PSPO enforcement. This will assist in identifying any disproportionate negative impacts and inform decisions with regard to any future intentions to extend, vary or discharge existing PSPOs

7. Authorisation

EqIA approved by ..... (Assistant Director/ Director)	Date .....

8. Publication

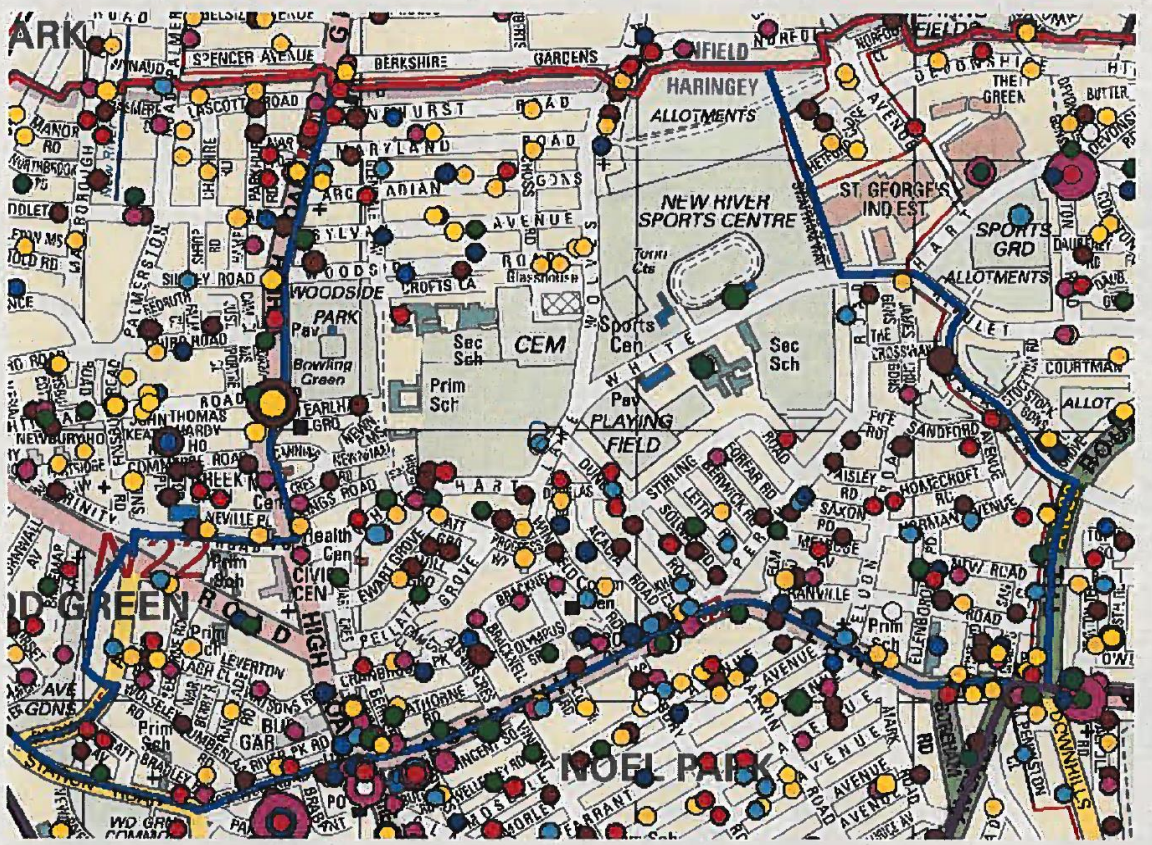
Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqIA process

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Report of ASB to support a Public Space Protection Order on Woodside ward

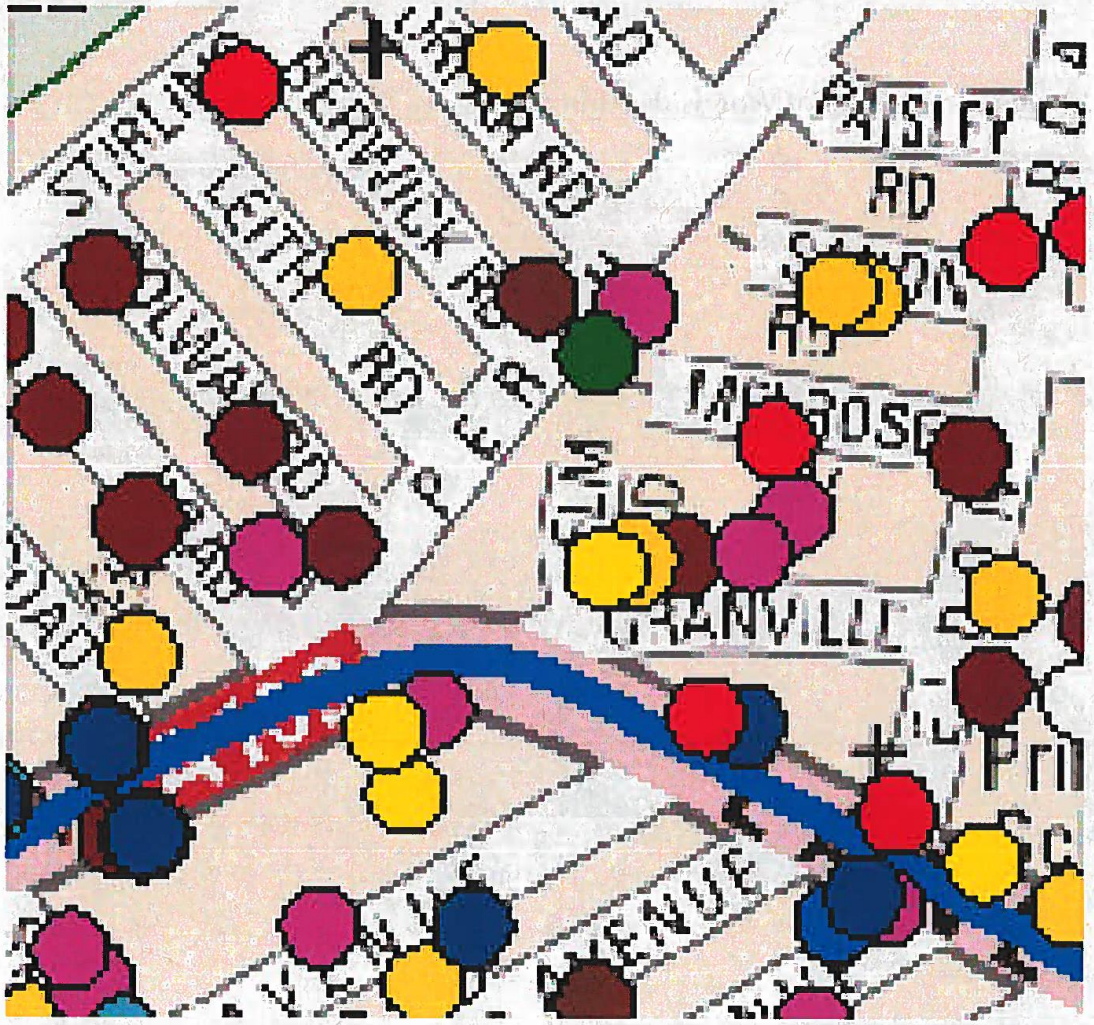
12 week crime map of Woodside (Haringey) ward October – December 2019



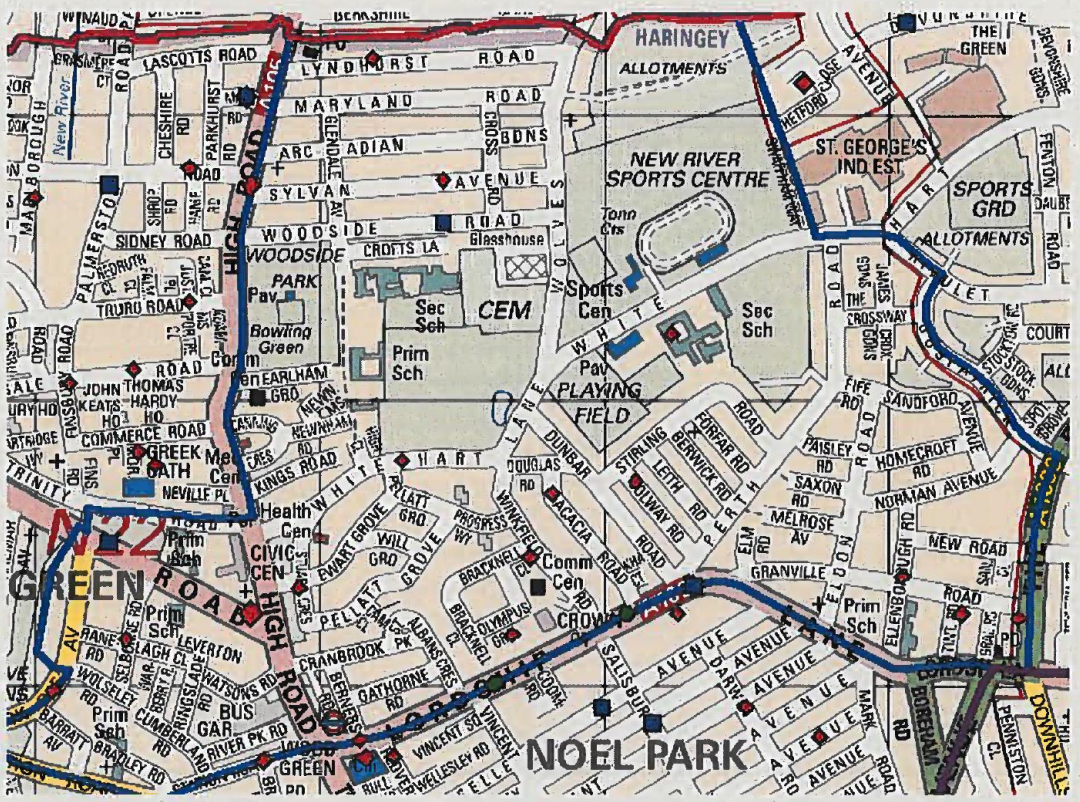
Key

Annotations
Underground Network Stations
Burglary_D_12
Arson and Criminal Damage_D_12
Drug Offences_D_12
Miscellaneous Crimes Against
Possession of Weapons_D_12
Public Order Offences_D_12
Robbery_D_12
Sexual Offences_D_12
Theft_D_12
Vehicle Offences_D_12
Violence Against the Person_D_12

Localized map of area around Chapman's Green (At junction of Lordship Lane and Perth Road) showing 12 week crime map.



Anti-Social Behaviour related calls to police November 2019



Anti-social incidents recorded on Lordship Lane N22, Perth Road and Chapmans Green 17/01/2019 – 18/12/2019

Date	Location	Type of incident	Reference #1	Reference #2
17/01/2018	Chapmans Green	Stop and account		
17/01/2018	Chapmans Green	Stop and account		
16/02/2018	Chapmans Green	GBH with intent		
09/03/2018	Chapmans Green	Drug search		
11/05/2018	Chapmans Green	Drug search		
19/05/2018	Chapmans Green	Theft from vehicle		
28/05/2018	Chapmans Green	Violent incident		
06/06/2018	Chapmans Green	Drug search		
12/06/2018	Chapmans Green	Drug search		
04/07/2018	Chapmans Green	Drug search		
06/07/2018	Chapmans Green	Stop and account		
12/07/2018	Chapmans Green	Drug serach - PWITS arrest		
12/07/2018	Chapmans Green	Drug search - PWITS arrest		
20/07/2018	Chapmans Green	Male exposing himself in park		
08/08/2018	Chapmans Green	Drug search		
19/09/2018	Chapmans Green	Eight (8) males. Football on green		
18/10/2018	Chapmans Green	Stop and account Male urinating		
23/10/2018	Chapmans Green	Male stabbed with large knife		
02/11/2018	Chapmans Green	Violent male in park		
26/11/2018	Chapmans Green	Male stalking female caller		
01/01/2019	Lordship Lane	Stop and search S23		
09/01/2019	Lordship Lane	Stop and search S23		
12/01/2019	Lordship Lane	Stop and search S1 (Weapon)		
12/01/2019	Lordship Lane	Stop and search S1 (Weapon)		
16/01/2019	Lordship Lane	Stop and search S1 (Weapon)		
19/01/2019	Lordship Lane	Robbery from person		
21/01/2019	Chapmans Green	Drug search		
26/01/2019	Lordship Lane	Violence against the person		
01/02/2019	Lordship Lane	Stop and search S1 (Weapons)		
01/02/2019	Lordship Lane	Stop and search S1 (Weapons)		
05/02/2019	Lordship Lane	Stop and search S23		
05/02/2019	Lordship Lane	Stop and search S23		
12/02/2019	Lordship Lane	Stop and search S23		
12/02/2019	Lordship Lane	Stop and search S23		
12/02/2019	Lordship Lane	Stop and search S23		
15/02/2019	Lordship Lane	Drink male at William Hill		
23/02/2019	Lordship Lane	Stop and search S23		
01/03/2019	Lordship Lane	Stop and search S60		

01/03/2019	Lordship Lane	Stop and search S60
01/03/2019	Lordship Lane	Stop and search S60
01/03/2019	Lordship Lane	Stop and search S60
03/03/2019	Lordship Lane	Stop and search S60
03/03/2019	Lordship Lane	Stop and search S60
06/03/2019	Lordship Lane	Gang members stopped in cab
06/03/2019	Lordship Lane	Gang members stopped in cab
12/03/2019	Lordship Lane	Male assaulted Metro Cabs
13/03/2019	Lordship Lane	Shoplifter at Tesco
14/03/2019	Lordship Lane	Stop and search S23
26/03/2019	Lordship Lane	Stop and search S23
26/03/2019	Lordship Lane	Stop and search S23
28/03/2019	Lordship Lane	Stop and search S23
29/03/2019	Lordship Lane	Stop and search S1
07/04/2019	Lordship Lane	ASB - Drugs
13/04/2019	Lordship Lane	Stop and search S1 (weapons) Arrest
23/04/2019	Lordship Lane	Stop and search S1 (weapons)
26/04/2019	Lordship Lane	Stop and search S23
26/04/2019	Lordship Lane	Stop and search S23
26/04/2019	Chapmans Green	Drug search
14/05/2019	Lordship Lane	Assault of the person
14/05/2019	Chapmans Green	Knife violence
14/05/2019	Lordship Lane	Stop and search S23
14/05/2019	Lordship Lane	Stop and search S23
14/05/2019	Lordship Lane	Stop and search S23
20/05/2019	Lordship Lane	Vagrant laying in street o/s Ladbrokes
20/05/2019	Chapmans Green	Drunk male in park ASB
30/05/2019	Chapmans Green	Possession of cannabis
05/06/2019	Chapmans Green	Drug search
05/06/2019	Chapmans Green	Drug search
05/06/2019	Lordship Lane	Male smoking crack in property
06/06/2019	Chapmans Green	Drug search
11/06/2019	Lordship Lane	ASB o/s Ladbrokes (Drugs)
15/06/2019	Lordship Lane	Stop and search S1 (weapons)
19/06/2019	Lordship Lane	Stop and search S23
25/06/2019	Chapmans Green	Seven (7) males fighting
01/07/2019	Lordship Lane	Violence against the person
04/07/2019	Chapmans Green	Drug search
10/07/2019	Chapmans Green	Search for stolen items
10/07/2019	Chapmans Green	Search for stolen items
18/07/2019	Lordship Lane	ASB o/s Paddy Power
22/07/2019	Lordship Lane	Stop and search S23
25/07/2019	Lordship Lane	Stop and search S60
25/07/2019	Lordship Lane	Stop and search S60

25/07/2019	Lordship Lane	Stop and search S60
26/07/2019	Lordship Lane	ASB o/s Paddy Power
06/08/2019	Lordship Lane	Possession of weapon
09/08/2019	Lordship Lane	Theft from vehicle
13/08/2019	Lordship Lane	Drugs ASB
22/08/2019	Lordship Lane	Stop and search S23
07/09/2019	Perth Road	Assault of street drinker
07/09/2019	Chapmans Green	Damage to park by fire
08/09/2019	Perth Road	Drunken males
10/09/2019	Lordship Lane	Violence o/s Paddy Power
19/09/2019	Perth Road	Theft
19/09/2019	Lordship Lane	Firearms call
20/09/2019	Perth Road	Theft from vehicle
20/09/2019	Perth Road	Noise nuisance from neighbour
21/09/2019	Perth Road	20 plus people fighting in the street
21/09/2019	Perth Road	Theft of vehicle
22/09/2019	Perth Road	Phone snatch
02/10/2019	Chapmans Green	Theft from vehicle
05/10/2019	Perth Road	Theft from person (bus)
06/10/2019	Perth Road	Theft from person
10/10/2019	Lordship Lane	Stop and search S1
10/10/2019	Lordship Lane	Stop and search S1
22/10/2019	Lordship Lane	Criminal damage
26/10/2019	Lordship Lane	Rape allegation
03/11/2019	Lordship Lane	Stop and search S1
15/11/2019	Perth Road	Assault of council employee
21/11/2019	Lordship Lane	ASB o/s William Hill
22/11/2019	Perth Road	Robbery from person
27/11/2019	Lordship Lane	Theft at Tesco
01/12/2019	Lordship Lane	ASB at Tesco
03/12/2019	Lordship Lane	ASB o/s Ladbrokes
10/12/2019	Lordship Lane	Assault
11/12/2019	Perth Road	Violence against the person
13/12/2019	Lordship Lane	Stop and search S23 - Arrest
16/12/2019	Lordship Lane	Violence against the person
18/12/2019	Lordship Lane	Racial attack

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Report for: Cabinet – 13th October 2020

Title: Tangmere and Northolt CPO

Report authorised by: David Joyce

Lead Officer: David Sherrington, Director of Broadwater Farm and Christine Addison, Assistant Director for Capital Projects & Property

Ward(s) affected: West Green Ward

Report for Key/ Non-Key Decision: Key decision

1. Describe the issue under consideration

1.1. On 13th November 2018, following detailed consultation with residents, Cabinet agreed the demolition of Tangmere and Northolt blocks and to build new Council homes on the Broadwater Farm estate. Cabinet also agreed a Rehousing and Payments Policy specific to Broadwater farm residents to support the rehousing process. Previously, in June 2018, the Tangmere Rehousing Priority Scheme was adopted as a matter of urgency due to the need to remove piped gas from the building as soon as possible to reduce potential danger.

1.2. The Council began negotiating the buyback of properties with leaseholders in Tangmere in June 2018 and with Northolt leaseholders in February 2019. As of 29th September 2020, 18 of the leasehold properties have been acquired and 5 secure tenants remain.

1.3 However, despite ongoing negotiations, there are 13 leaseholders in Northolt and 6 leaseholders in Tangmere whose interests have not yet been acquired (19 in total). As of 29th September 2020, 10 of the leaseholders remaining have reached agreement to sell to the Council by private treaty, with these sales to be finalised. Therefore, negotiations with 9 leaseholders have yet to reach agreement.

1.4 On 14th July 2020, Cabinet approved an updated Acquisition Strategy for the remaining leaseholders in Tangmere and Northolt. This strategy was agreed to enhance the prospects of acquiring the remaining interests by agreement as far as possible. The decision to proceed to make a Compulsory Purchase Order 'CPO' is being made in parallel to ongoing negotiations to acquire all remaining interests where acquisition by agreement cannot be reached.

1.5 This Report therefore seeks authority for the Council to use its compulsory purchase powers to make 'The London Borough of Haringey (Tangmere and Northolt) Compulsory Purchase Order 2020' ("the Order") in respect to Tangmere and Northolt site (shown edged red on the attached plan) and to acquire all outstanding property interests and any additional rights that may be required. This

will ensure vacant possession should the Council fail to reach a negotiated settlement for the purchase of the outstanding third-party land and property interests.

1.6 The possibility of using compulsory purchase powers was identified in the Cabinet report of the 13th November 2018 which noted that 'should the Council and any leaseholders not reach an agreement in a reasonable period, it may be necessary, as a last resort, for the Council to consider using its compulsory purchase powers.'

1.7 This report also sets out a number of decisions required by the Council in order to progress with the preparation and making of the Order.

2 Cabinet Member Introduction

Cllr Ibrahim, lead member for Housing:

2.1 In 2018, it became apparent that the Tangmere and Northolt blocks on the Broadwater Farm estate were unsafe and would need to be extensively refurbished or demolished and replaced. Following a positive consultation with residents in both blocks, the decision was taken in November 2018 that demolition was the most suitable option – enabling for the delivery of new, safe and high-quality Council homes on the estate.

2.2 Almost two years later, there are still a handful of leasehold properties where a sale has not been agreed (noting agreement has not been reached with 9 leasehold interests remain in both blocks which comprise 218 flats in total). The Council continues to negotiate with the leaseholders of these properties to reach an agreement and is also initiating formal procedures in parallel rather than waiting for negotiations to break down before starting the compulsory purchase process. It is vital that the work of demolishing the blocks takes place so that the new homes can be delivered. The Council will always prioritise resident's safety – and the blocks remain structurally unsound. This is not acceptable for the few remaining residents of the blocks or residents of the surrounding areas. Maintaining and securing the blocks with only a few residents inside is an expensive task that does not represent value for money for our residents. Therefore, it is necessary to progress with a Compulsory Purchase Order (CPO) to ensure that these blocks can be fully vacated, demolition can begin and the new Council homes can be delivered.

2.3 These works will have a positive impact on residents, providing high-quality Council homes that are fit for the future. Throughout this process Broadwater Farm residents will have opportunities to work in partnership with the Council to ensure that the new Council homes are reflective of the community's needs. The only way for this work to progress is to begin the CPO process – guaranteeing vacant possession of the building and enabling the Council to deliver the new homes residents deserve.

3 Recommendations

That Cabinet:

3.1 Authorises the making of the Order to acquire all land and rights within the land edged red on (Appendix 2(b)) for housing purposes pursuant to the powers contained in section 17 of the Housing Act 1985, to enable the Council demolition of the Tangmere and Northolt blocks and the erection of new housing accommodation on the site so as to achieve a future qualitative gain following confirmation of the Order.

3.2 Delegates authority to the Director of Housing, Regeneration and Planning in consultation with the Assistant Director of Corporate Governance as follows:

3.2.1 To make all necessary changes, as appropriate to the draft Statement of Reasons (and any adjustment to the Order Schedule and Order Map) and take all necessary steps to make, serve and implement the Order, to pursue its confirmation by the Inspector, Secretary of State (or the Council) and to implement the Order as may be necessary (these steps are set out in section 6.59-6.74 of this report);

3.2.2 To make General Vesting Declarations (GVDs) under the Compulsory Purchase (Vesting Declarations) Act 1981 and/or to serve notices to treat and notices of entry (if required) following confirmation of the Order;

3.2.3 To issue and serve any warrants to obtain possession of property acquired by the Council following the execution of a GVD or service of a notice of entry relating to the Order if it is considered appropriate and necessary to do so;

3.2.4 To acquire third party interests in the land within the Order either by agreement or compulsorily; and

3.2.5 To finalise and confirm the Order documents prior to making the Order.

4 Reasons for decision

4.1 Proceeding with a CPO and making the Order is necessary due to the extensive timescale and resources expended in acquiring all of the third-party properties by private treaty spanning approximately 2 years to date, which puts at risk residents' safety. Residents approved the demolition of the blocks via consultation during 2018, and the Order is now necessary to ensure this can be delivered. The reasons for the Order are set out in the draft Statement of Reasons attached at Appendix 1.

4.2 To date and despite ongoing negotiations with affected parties, the Council has been unable to acquire all of the outstanding third party land interests in the proposed CPO site through agreement and is unlikely to be able to do so without the use of the Order. The demolition of both the Tangmere and Northolt blocks and the redevelopment of the site is at considerable risk if control of all of the land interests within the Order area is not obtained within a reasonable time. In the absence of making and using the powers afforded by the CPO, negotiations by the

Council with parties with individual land interests could be much more difficult and protracted, as has been the case to date. Delays could also make the proposals more expensive, putting the deliverability of the project at risk. This would be due to the long-term costs associated with security of the blocks, the ongoing repairs and maintenance required whilst the blocks remain in place and outstanding interests to be acquired. Further to this, resident's safety remains the Council's priority and leaseholders continuing to remain in the blocks increases the risk to them and the surrounding area in the event of progressive collapse. The Cabinet is asked to resolve to make the Order to acquire all land and rights within the CPO Site. Officers are satisfied that there is a compelling case in the public interest to make the Order for the reasons set out in this Cabinet Report and the draft Statement of Reasons see Appendix 1. This is the reason for the recommendations at section 3 of this Report.

4.3 Therefore, the justification for making the CPO is:

1) the blocks are unsafe and pose a risk both to inhabitants and the surrounding areas;

2) the cost of the buildings remaining represents poor value for money due to the prohibitively high cost of refurbishment and structural works;

3) the Council cannot deliver its commitments to rebuilding homes until demolition has been undertaken.

4.4 The confirmation of a CPO can be protracted if the CPO is challenged, which means the Council must therefore proceed with starting the CPO process now in order to avoid any further delays. A number of further steps will need to be taken to issue, serve and implement the Order. In order to expedite this process, Cabinet is also asked to grant delegated authority to the relevant officers identified in section 3 of this Report to undertake the actions required. This is the reason for the recommendations at 3.2 of this Report

4.5 In order to use the powers under section 17 of the 1985 Housing Act to make the Order it is necessary for the Council to commit to delivering a *quantitative or qualitative gain* in housing stock on the CPO Site. On 13th November 2018, Cabinet reiterated that following demolition of the two blocks the Council would re-provide at least the same number of Council homes as will be demolished. As these homes will be structurally compliant, this will represent a qualitative gain in housing. Design proposals are already being developed to ensure that this is the case. The Council will also explore options to deliver a quantitative housing gain by providing more units on the Order Land and the surrounding vacant land.

4.6 The definitive case for making the CPO is in the draft Statement of Reasons, appended to this report.

5 Alternative options considered

5.1 A number of alternative options were considered and rejected:

- **Option 1 - do not make a CPO, continue negotiations:**

Option 1 is not recommended as it does not give the project any certainty in terms of the timeframe or budget. Negotiations have been ongoing with leaseholders in Tangmere since June 2018 and Northolt since February 2019 as referenced in section 1.1 of this Report. To date, despite ongoing negotiations and a comprehensive rehousing and payments policy being in place, agreement has not been reached to acquire the outstanding leasehold interests in the blocks by private treaty.

- **Option 2 - do not make a CPO, stop negotiations:**
  Option 2 is not a realistic option as the blocks were agreed to be demolished in November 2018 and need to be demolished due to safety concerns. The Council and Homes for Haringey have obligations to ensure the safety of the buildings, residents and neighbours – obligations that would not be met if this option was chosen.

- **Option 3 - make a CPO using alternative statutory powers**
  Option 3 is not recommended as, based on legal advice and full consideration of the specifics of the site, Section 17 of the Housing Act 1985 is considered the most appropriate enabling power.

6 Background information

Large panel system buildings and Broadwater Farm structural surveys

6.1 Tangmere and Northolt blocks were constructed using a Large Panel System (LPS) method. The requirement for LPS systems with a piped gas supply is that they should be able to withstand an explosive force measuring 34 kN/m², which is the equivalent of a piped gas explosion. The requirement for LPS blocks without a gas supply is that they should be able to withstand an explosive force of 17 kN/m², which is the equivalent of the force of a vehicular strike to the building or from a bottled gas explosion.

6.2 Following the fire at Grenfell Tower in June 2017, Homes for Haringey commenced a review of the safety of buildings they manage on behalf of the Council.

6.3 The structural defects identified at Broadwater Farm became apparent following structural surveys to “open up" a sample of properties on the estate to understand the construction of the blocks. This work was completed in line with government regulations and guidance on LPS blocks issued by the Building Research Establishment (BRE).

6.4 In 2017, Homes for Haringey engaged construction consultants Ridge, and from October 2017 intrusive structural surveys were carried out in a sample of properties on the estate which had been kept empty when they became vacant. The remit of Ridge’s appointment was to carry out structural investigations to determine the robustness of the 12 blocks on Broadwater Farm, advise on next steps and prepare subsequent structural cost estimates.

6.5 The work undertaken by Ridge was peer reviewed by Curtins in June 2018 to ensure the findings were robust. Over the course of this work, structural issues were discovered in eleven of the twelve blocks on Broadwater Farm.

6.6 Tangmere and Northolt blocks were found to fail the lower test of 17 kN/m² and required the most remedial works as a result to ensure they met building standards.

Tangmere

6.7 Tangmere is a ziggurat construction of 6 storeys over a concrete frame. Tangmere is of a different design to the other blocks on the estate, and as such was considered separately. It comprises 116 flats of which 89 were tenanted, 25 were leasehold and two were empty. 12 of the leasehold properties were leased to Newlon Housing Association, which were acquired following Cabinet approval in June 2018.

6.8 In February 2018, Homes for Haringey received the result of the first of the Ridge tests relating to Tangmere. This identified that Tangmere had failed the 34 kN/m² test. In April 2018 the Council received results of further surveys which showed that Tangmere had also failed the lower, 17 kN/m² test.

6.9 Homes for Haringey implemented a number of mitigation measures to improve safety whilst options to mitigate risks in the long term were explored. These investigations concluded that the only way to do this would be to carry out significant strengthening works to Tangmere, and to remove the piped gas from the block completely by connecting it to the new district heating system.

6.10 Homes for Haringey commissioned a feasibility study and cost estimate for retrospectively strengthening Tangmere to ensure it was fully compliant with building regulations, which was received on 18th May 2018. Strengthening Tangmere would require the following works to be undertaken to the 116 units:

- Structural steel works to elevations and roof areas.
- Structural steel plates and straps fixed internally and connecting to the existing structural floors and new external steels.
- Allowance for fire proofing to all new steelwork.
- Removal and reinstatement of roof coverings where steel fixing required.
- Internal reinstatement works including electrical, full re-decoration and new floor coverings.

6.11 The cost of strengthening Tangmere was estimated at £13.1m (equivalent to £112,000 per flat). In addition to the cost of the strengthening works, other works were identified as necessary to bring Tangmere up to Decent Homes standard. As Tangmere had piped gas, it would also need to be connected to the renewed district heating system. The total cost of the works required on Tangmere to make it safe for long-term habitation and meet the Decent Homes Standard was costed at approximately £19m in total (a total cost of £164,000 per flat). These cost estimates were determined in 2018, there is no reason to believe that these prices have changed significantly to justify a different course of action. It is assumed that costs will have increased in line with inflation.

6.12 Due to the severity of the findings, and the fact that piped gas was due to be turned off in October 2018, Cabinet resolved on 26th June 2018 to begin the immediate rehousing of Tangmere residents.

6.13 An updated visual survey was carried out by Ridge in July 2020 which concluded that there were areas of minor spalling of concrete, water damage on the underside of concrete floor slabs, and areas of damp that had deteriorated since the initial survey. These findings reinforce the urgency with which interests need to be acquired to ensure the block is fully vacated at the earliest opportunity.

Northolt

6.14 Northolt is an 18-storey tower block built above a concrete podium. It comprises 102 flats of which, in 2018, 85 were tenanted, 14 were leasehold and 2 were empty. Northolt is not served by piped gas and is served by the existing District Heating Network. The 34 kN/m² test is therefore not applicable to Northolt as it does not have piped gas.

6.15 In April 2018 the Council received results of the surveys which showed that Northolt had failed the 17 kN/m² test.

6.16 The feasibility study for Northolt was received on 25 May 2018 and showed that the following strengthening works would be required to the properties in Northolt:

- Structural steel works to elevations and roof areas.
- Structural steel plates and straps fixed internally and connecting to the existing structural floors and new external steels.
- Allowance for fire proofing to all new steelwork.
- Removal and reinstatement of roof coverings where steel fixing required.
- Full internal reinstatement works including mechanical and electrical, new bathrooms, kitchens, full re-decoration and new floor coverings.
- Making good works externally including complete over cladding.

6.17 The report estimated that the cost of the strengthening works would be approximately £12.5m (equivalent to £122,500 per flat). With additional refurbishment costs included, the works required to Northolt were costed at £14.6m in total or a cost of approximately £145,000 per property. These cost estimates were determined in 2018 and, based on the updated visual survey undertaken by Ride in July 2020, there is no reason to believe that these prices will have changed significantly to justify a different course of action. It is assumed that costs will have increased in line with inflation.

6.18 The structural repairs proposed for both blocks, if adopted, would have been prohibitively expensive and highly intrusive, requiring residents to be rehoused for around 12 months. Even if the structural work was undertaken, many of the properties would still not meet the Decent Homes Standard, nor would they meet the qualitative standard of housing that the Council aims to provide.

6.19 As a result of these findings, the decision was taken to consult residents on the demolition of the two blocks – which resulted in strong majority support in favour

of demolition from residents of both blocks. This position was subsequently approved by Cabinet in November 2018.

6.20 The decision to begin rehousing Northolt residents was made by Cabinet on 13th November 2018 and following some minor alterations to the policy, the resolution for rehousing to commence was implemented in early 2019. Noting that the Northolt block did not contain piped gas, the decision was made to prioritise Tangmere with the timescale adopted for Northolt allowing for the required changes to be made within a reasonable timescale.

6.21 In summary, the updated visual survey carried out by Ridge in July 2020 did not note any specific deterioration in Northolt, however, it confirmed the initial survey findings to still be true. This included the finding that progressive collapse poses a threat to the surrounding area, reinforcing the requirement for demolition at the earliest opportunity.

Engagement and communications

6.22 Since the structural surveys uncovered the issues with the blocks in December 2017, the Council and Homes for Haringey have carried out an intensive programme of resident engagement on the estate. The engagement approach recognised that the discovery of health and safety related problems with the blocks would worry residents and it was important to reassure residents and inform them of the steps the Council and Homes for Haringey were urgently taking to reduce the risks and to ensure their safety.

6.23 Specific engagement was targeted for Tangmere and Northolt blocks. This included a programme of home safety visits and the introduction of a 24-hour concierge at each access point to each building.

6.24 Engagement activities included:

12th February 2018:

6.24..1 Meeting held with representatives of Broadwater Farm Residents' Association
6.24..2 Meeting held with community leaders
6.24..3 Door knocking at Tangmere was carried out. Written information was left with every resident or posted through the letterbox where no one was home.
6.24..4 Drop-in centre was set up at 108 Gloucester Road office
6.24..5 Dedicated phone line set up with freephone number

19th February 2018:

6.24..6 Homes for Haringey staff attended Broadwater Farm Residents' Association meeting to provide an update
6.24..7 Letters delivered to residents of Northolt to update on progress

6.25 Additional to this, HfH officers met with the Residents Association on a weekly basis throughout this period to discuss any issues or concerns and to keep them updated.

6.26 By mid-May 2018, Homes for Haringey's tenancy management team had visited every home in the blocks and staff had personally spoken to nearly every resident about the findings of the structural surveys and what the next steps would be.

6.27 In June 2018 further engagement was undertaken with residents to keep them updated on the structural findings. This included door-knocking, 1-1 meetings, drop-in sessions, and letters as well as informing residents of the upcoming consultation on demolition. This also included practical advice to mitigate risk in the short-term, such as the banning of bottled gas from the buildings.

6.28 Engagement and communications have continued with residents, to ensure that all residents were made aware of the findings of the structural surveys, kept informed on what is happening next, and the mitigations that are necessary to ensure their safety. This engagement has taken the form of written communications, door-knocking, signs in the entrance lobbies of blocks, drop-in sessions and independent ITLA advice.

6.29 Engagement in this period has also been undertaken through dedicated rehousing officers who have supported all residents in trying to find suitable moves and sharing key messages and information, such as communicating the provisions in the Broadwater Farm Rehousing and Payments Policy to tenants and leaseholders.

6.30 It is the Council's intention that engagement will continue throughout the CPO process to ensure all residents in Tangmere and Northolt are made aware of proposals and future plans, including by involving residents in the design process for the new homes.

Consultation on demolition

6.31 Extensive consultation was carried out on the proposal to demolish the Tangmere and Northolt blocks with residents in September and October 2018.

6.32 This consultation set out why demolition was the preferred option, namely:

- Health and safety issues have been identified in Tangmere and Northolt, which need to be addressed to make the blocks safe in the long-term;
- The costs of the works required to both blocks to address the health and safety issues are significant and would have a major impact on the position of the Housing Revenue Account.
- This would mean that investment in other Council homes and estates would need to be re-profiled.
- The Council's preferred option for both blocks was therefore to rehouse residents - in line with the rehousing policy also to be consulted on – and to demolish the blocks.

6.33 The consultation – which was extended to include leaseholders as well as secure tenants – ran from September 12th 2018 to October 10th 2018 and resulted in 81% of respondents from Northolt approving the proposals and 91% of Tangmere respondents approving the proposals.

6.34 The consultation was carried out by way of a letter and question booklet, which were handed to residents on 12th September 2018. These materials were provided in multiple languages, large print, and braille as needed. Further to this, drop-in events were held and door-knocking was undertaken. Translators were also available for residents whose first language was not English.

6.35 In total, 6 drop-in sessions were held – the vast majority of which took place in the foyer to Tangmere and Northolt, to ensure easy access for all residents.

6.36 Additional to this, the Independent Tenant Leaseholder Advisors (ITLA) also held drop-in sessions and undertook their own door-knocking.

6.37 A total of 108 responses were received from 105 of the 206 properties (excluding the 12 properties previously owned by Newlon making up the 218 flats in total in both blocks) (51%). Tangmere had a response rate of 40% (42 of 104 properties) whilst Northolt had a response rate of 62% (63 out of 102 properties). Tangmere's response rate was lower due to the fact that many Tangmere residents had already agreed moves away at the time of this consultation under the Tangmere Rehousing Priority Scheme adopted by Cabinet in June 2018.

Consultation on rehousing and payments policy

6.38 To guide the rehousing of secure tenants and to start the acquisition of leasehold interests, the Council consulted with residents in September and October 2018 on a Broadwater Farm Rehousing and Payments Policy. This policy applied to resident leaseholders (who resided in the blocks as of 26th June 2018) and secure tenants in the Tangmere and Northolt blocks. It also applied to those who have moved since 26th June 2018 under the provisions of the Tangmere Rehousing Priority Scheme. To agree acquisition by agreement in a reasonable timeframe, the Council has as far as reasonably possible expanded the offers proposed.

6.39 The policy, which was finalised and approved on 21st January 2019, committed to the following:

- Offer of the full market value for the home
- Home loss payments (10% of market value) subject to the statutory cap
- Disturbance payments
- Basic loss payments
- Under-occupation payments
- Additional payments (e.g. reasonable legal costs of buying new property)
- A Right to Return to a newly built replacement home on the estate
- Additional, practical non-financial help to purchase a new property if necessary
- Equity Loans up to 40% of the leaseholders new home

6.40 Non-resident leaseholders are eligible for market value for their property and Basic Loss payments of 7.5% of the value of their home.

6.41 All residents also had access to dedicated rehousing officers to help them through the process and support them at every step of the move, including packing and un-packing services for elderly or vulnerable residents.

6.42 The Council's broader Estates Renewal Rehousing and Payments Policy is guided by three core principles:

- No tenant or leaseholder will be financially worse off
- All tenants and resident leaseholders will have a Right to Return
- All tenants and resident leaseholders who wish to move will be supported to do so

Undertaking negotiations with leaseholders

6.43 Negotiations with affected leaseholders in Tangmere started in June 2018 and negotiations with affected leaseholders in Northolt started in early 2019 to acquire their leasehold interests, following the Cabinet's decision to demolish the blocks and approval of the Broadwater Farm Rehousing and Payments Policy.

6.44 Negotiations with remaining leaseholders have not been concluded mainly due to two factors:

- Private valuations being different from Haringey Council's which have led some individual leaseholders to request to up to 50% more than market value.

- Some leaseholder's requests being outside the previously agreed Broadwater Farm Rehousing and Payments Policy.

6.45 Negotiations are still ongoing to acquire the remaining leasehold interests by agreement and to rehouse owner occupiers. During negotiations affected parties have been informed of the likelihood of the Council making a CPO, although the Council's preferred strategy continues to be to acquire by agreement on reasonable terms.

6.46 To enhance the Council's offer to leaseholders Cabinet agreed a number of additions to the existing policy on 14th July 2020, which included:

- Enabling equity loans to be offered outside of the borough in certain circumstances. The original policy only allowed equity loans within Haringey.

- The option for remaining leaseholders to request a 'social tenancy' to replace their existing interest. In such circumstances, the Council would pay the leaseholder a sum lower than full market value for the leasehold interest, in addition to any home loss and disturbance payments.

6.47 This further demonstrates the Council's commitment to acquiring all leaseholder interests by agreement and reinforces that the decision to make the CPO has been taken as a measure of last resort.

6.48 The Council has, as of 29th September 2020, completed the acquisition of 18 leasehold interests in the Tangmere and Northolt blocks. There are a further 13 leaseholders in Northolt and 6 leaseholders in Tangmere as of 29th September 2020. 10 of these leaseholders have agreed to the sale of their property, with the acquisitions still to be completed. A draft list of the interests to be acquired is attached at [Appendix 2(a)]. Additional to this, there remains 5 secure tenants in Northolt block who are awaiting suitable properties for rehousing. These addresses have been included in the draft Order Schedule.

6.49 Third-party interests were identified in both Tangmere and Northolt comprising the UK Power Network (UKPN) sub-stations located at the base of each block. Agreement with UKPN has been reached for the relocation of the two sub-stations. At the time of writing, the leases of the new location have not been finalised, requiring the inclusion of UKPN's interests in the draft Order and Order Schedule. However, it is anticipated that confirmed CPO powers will not need to be utilised to acquire these interests.

6.50 The above demonstrates that the Council has been negotiating with affected leaseholders and third parties to acquire the remaining interests and has worked hard to be flexible and adaptable to their needs. Pursuing the CPO at this stage is reflective of the few remaining interests having the potential to cause significant delays to the programme of demolition and rebuild and the associated risk this poses to residents and neighbours' safety.

Future new homes on the Site

6.51 In parallel to the rehousing process, the Council appointed Karakusevic Carson Architects (KCA) in December 2019 as the lead Design Consultant for this project.

6.52 KCA are a lead design consultant specialised in developing high quality designs for social and affordable housings. Following resident engagement, KCA will be developing and submitting a planning application which seeks to replace the social rented homes on the Tangmere and Northolt sites**.**

6.53 The design for the new homes will be aligned with an overall Estate Urban Design Framework, which will ensure that the new designs are coordinated and aligned with the existing infrastructure whilst they will also highlight opportunities for improvements within the short, medium and long-term.

6.54 From September 2020 the Council, Homes for Haringey, and KCA will be working with the community to develop design options for both the new homes and the design framework.

6.55 As of August 2020, KCA have completed Stage 0 and Stage 1 reports for the two sites, and developed a comprehensive engagement and communications strategy for residents to contribute to the plans for new homes.

6.56 A ballot will also be carried out in 2021, giving all residents on the estate the opportunity to vote on the proposals for new homes.

6.57 In February 2020, Cabinet approved the provision of £68 million in the Housing Revenue Account financial plan over the next 10 years. The demolition will be funded from this provision.

6.58 There is provision in the current Broadwater Farm budget as approved by Cabinet in February 2020 for the CPO process from making of the Order through to implementation (as may be necessary), dealing with all compensation payments and associated aspects in conjunction with the proposed demolition and building of new homes.

Justification for the CPO

The enabling power for the exercise of CPO powers is section 17 of the Housing Act 1985. Section 17 applies to the "acquisition of land for housing purposes" and provides that "a local housing authority may for the purposes of this Part [Part II – provision of housing accommodation] (a) acquire land as a site for the erection of houses (b) acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings…"] Uses of this power include assembling land for housing and ancillary development or improving substandard or defective properties.

Statement of Reasons

The reasons for making the Order must be submitted by the acquiring authority (in this case LB Haringey) when applying for consideration and confirmation of the Order. This is known as the Statement of Reasons and a draft of the Statement of Reasons for the Order is attached at Appendix 1. This sets out in detail the purpose of acquiring the land, the justification for doing so generally and in the context of Human Rights considerations and provides the context for the order, and specific information required under the Guidance on Compulsory purchase process and The Crichel Down Rules issued by the Secretary of State as updated ('the Guidance') including information regarding needs for the provision of further housing accommodation in its area (including (inter alia) the total number of dwellings in the district, the total number of substandard dwellings (ie the quantity of housing with Category 1 hazards as defined in section 2 of the Housing Act 2004), the total number of households and the number for which, in the authority's view, provision needs to be made, details of the authority's housing stock by type, particularly where the case for compulsory purchase turns on need to provide housing of particular type) including relevant planning policy, equalities impact, resources for delivery and local engagement undertaken.

Compelling Case in the Public Interest.

Given that compulsory purchase powers should only be used as a 'last resort', as set out in the Guidance, the Council must be able to demonstrate that there are sufficiently compelling reasons for the powers to be sought at this time.
It must show how it intends to use the land which it is proposing to acquire and that all the necessary resources are likely to be available to achieve that end within a reasonable time-scale.

Section 6 of the Guidance points out that under Section 17(4) of the Housing Act 1985 the Secretary of State may not confirm a compulsory purchase order unless he is satisfied that the land is likely to be required within 10 years of the date the order is confirmed.

The CPO process

6.59 A CPO allows a public authority to acquire third party interests in land compulsorily. As per the Guidance it is proposed to progress the CPO concurrently with the strategy (outlined in this report) to acquire the land voluntarily.

6.60 A CPO is viewed as a serious interference with private property rights and human rights, is a complex process and should only be used following careful consideration of other options. Preparation of a CPO requires attention to detail and strict adherence to statutory requirements all of which is covered under other provisions in this report.

6.61 Making the Order does not give the Council the power to acquire the land – this power arises only when the Order is exercised after it is confirmed either by the Council, the Planning Inspectorate or by the Secretary of State.

6.62 If the Cabinet agrees to the use of CPO powers, the statutory CPO process for the preparation and making of the Order will be followed including notification and publicity requirements.

6.63 Following the making of the CPO, the Council must notify the affected persons that the CPO has been made and is to be submitted to the Secretary of State for confirmation and then submit the CPO for consideration.

6.64 Affected persons then have an opportunity to object to the Secretary of State. If no one objects, the Secretary of State is likely to invite the Council to confirm the Order following which, the Council has the power to implement the Order and acquire the third party rights and interests in the Order land.

6.65 Where there are objections, the Secretary of State will appoint an inspector to hold a public inquiry into the Order.

6.66 For a programme such as this, the inquiry could probably run for several days/weeks and will depend on the nature and number of objections.

6.67 The Inspector's report will summarise the evidence and come to a view as to whether there is compelling public interest for the confirmation of the Order. The inspector will then report this recommendation to the Secretary of State, who makes the final decision.

6.68 If the Order is not confirmed, the Council may have the option of bringing a judicial review to challenge the legality of the decision-making process should suitable grounds of claim exist.

6.69 If and when the Order is confirmed there is a 6-week window during which affected parties may bring a High Court challenge to the legality of the decision-making.

6.70 Cabinet are advised that the current programme of dialogue and negotiations to agree relocation and acquisition of interests of all affected interests will continue in parallel to this process.

6.71 Adoption of the recommendations in this report does not necessarily mean that CPO powers will be used to enable acquisition of all third-party interests to enable the demolition. As per the Guidance, the Council has been and will continue to seek to reach negotiated settlement with all those land interests that are required and implementation of a confirmed CPO will only arise where agreement cannot be reached on reasonable terms and in a reasonable timeframe. The authority given in this report assists the Council by making it clear to all outstanding land interests that the Council intends to deliver the demolition and is willing to secure and exercise a confirmed CPO, if required.

6.72 This report, including the appended draft site plan and draft Statement of Reasons, contains the relevant information required to justify the making of the Order, in due course as proposed.

6.73 The Guidance on compulsory purchase requires that "acquiring authorities" such as the Council should be sure that the purposes for which the compulsory purchase order is made justify interfering with the human rights of those with an interest in the land affected and that the officers' report seeking authorisation for the compulsory purchase order should address human rights issues. Officers have taken into account the impact of the Order on the Convention rights of those whose interests will be affected by the Order generally as set out in the draft Statement of Reasons and through an Equalities Impact Assessment, both appended to this report. In view of the factual background to the Order as set out in the Statement of Reasons, and the compelling justification for making the Order, officers consider that the exercise of compulsory purchase powers in this case is justified because it is in the public interest, authorised by law and necessary and proportionate in order to achieve the Council's objectives of securing the safety of the buildings residents, neighbours and securing a future qualitative housing gain.

6.74 As part of the CPO process the Council will need to demonstrate that funding is available to deliver the proposed demolition and acquisition of land and property interests. The Cabinet report from June 2018 approved usage of £11.5m capital provision, part of which was for the urgent rehousing of Tangmere residents. November 2018 Cabinet approved £1.2m in the HRA for 'Northolt Rehousing Costs'. Further provision has been made in the HRA financial plan and are contained in the BWF capital budget 2020/21 to ensure all acquisitions can be made.

Indicative timeline (subject to change)

- October-December 2020 – Serve Requisition for Information notices, undertake site visits to finalise draft Order documents.
- Jan 2021 – Advertise, give notice to affected parties and submit the Order to Secretary of State (SoS) for consideration. Objection period begins.
- Feb 2021 – Objection period ends having provided at least 21 days, with any objections received. Prepare objection responses and engage objectors (as may be required). It may be the case that no objections are received.
- Mar-Apr 2021 – SoS advises need for inquiry and inquiry date set. As an alternative to an inquiry, objections can be considered by the Planning Inspectorate through the written representations procedure, this will depend on numbers and complexities of objections.
- Apr-July 2021 – Objector and leaseholder negotiations continue, Statement of Case prepared and submitted, expert witness evidence prepared and submitted.
- Sep-Oct 2021 – Possible inquiry date
- Jan – Apr 2022 – Order confirmation and legal challenge period. Refresh referencing and serve acquisition notices.
- May – Aug 2022 – Remaining interests acquired.

7 Contribution to strategic outcomes

7.1 The Council's first priority as set out in the Borough Plan is a safe, stable, and affordable homes for everyone, whatever their circumstances. The actions recommended in this report support the objectives that will help to achieve that priority in a number of ways:

7.2 Concluding the purchase of the remaining homes and enabling the project to proceed will contribute to the Council's objective of ensuring safety in housing of all tenures across the borough.

7.3 The progress of this project will drive up the quality of housing, helping to ensure 95% of Council homes meet the Decent Homes Standard by 2022 and that all Council homes and estates are brought up to the high standards that residents deserve. The new homes will meet the Council's published standards for quality and design.

7.4 The project will not only very significantly improve the quality of homes for existing residents but will also contribute to the delivery of additional new Council homes at Council rents. One of the Council's very highest priorities is to start a new era of Council housebuilding in the borough, particularly using our own land.

8 Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

8.1 The 14th July 2020 cabinet report on Leasehold acquisition and equity loan arrangement on BWF made various recommendations over and above the ERRPP to facilitate the negotiation and acquisitions of these leasehold properties.

8.2 CPO is considered a necessary route where Leaseholders fail to reach an agreement with the Council based on these new offers.

8.3 In deciding to make a CPO, the Council needs to be confident that such a step is likely to be successful before committing expenditure.

8.4 CPO guidance is clear that in justifying the making of an order the Council must provide substantive information about the sources of funding for both acquiring land/properties and implementing the schemes for which the land is required, and that the funding is available now or early in the process.

8.5 The costs of the potential acquisitions and development of new replacement homes for Tangmere and Northolt have been provided for in the HRA capital programme budget.

8.6 Other costs such as costs related to making CPO, including staff time and legal costs is contained within existing BWF capital programme budget.

9 Procurement

9.1 There are no procurement implications with this proposal.

10 Legal

10.1 The Assistant Director of Corporate Governance has been consulted on the content of this report and has provided comments on the report.

10.2 The Council can under section 17 of the Housing Act 1985

(a) acquire land as a site for the erection of houses,

(b) acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings,

(c) acquire land proposed to be used for the purpose of providing facilities in connection with housing accommodation, and

(d) acquire land in order to carry out on it works for the purpose of, or connected with, the alteration, enlarging, repair or improvement of an adjoining house. Land may be acquired by the Council as a local housing authority for these purposes either by

agreement, or they may be authorised to be acquired compulsorily by the Secretary of State.

The Council may, with the consent of, and subject to any conditions imposed by, the Secretary of State, acquire land for these purposes notwithstanding that the land is not immediately required for those purposes but the Council must demonstrate to the Secretary of State that the land is likely to be required for those purposes within ten years from the date on which he confirms the compulsory purchase order.

10.3 The Council must comply with various statutory provisions in the making of the Order and legal advice will be provided throughout the process.

10.4 The Acquisition of Land Act 1981 (the 1981 Act) governs the procedures which apply to such an acquisition, the Compulsory Purchase Act 1965 governs post-confirmation procedures and the Land Compensation Acts 1961 and 1973 govern the amount and assessment of compensation. The procedure for confirmation is specified in the 1981 Act and may require the conduct of a public inquiry if there are objections. In the event that the CPO is confirmed the Council can then take steps to acquire land either by serving a notice to treat and notice of entry in accordance with the 1981 Act or by serving a general vesting declaration under the Compulsory Purchase (Vesting Declarations) Act 1981. Consideration would need to be given to the most appropriate route and the procedure set out by legislation must be followed.

10.5 As an acquisition under the 1981 Act will extinguish third party rights, the Council will need to take care that it does not contravene the rights of individuals under the European Convention on Human Rights (the ECHR):

- Section 6 of the Human Rights Act 1998 prohibits public authorities from acting in a way that is incompatible with the European Convention on Human Rights. The Convention rights likely to be relevant to the Order are:

- First Protocol Article 1: Peaceful enjoyment of possessions. This right includes the right to peaceful enjoyment of property and is subject to the State's right to enforce such laws as it deems necessary to control the use of property in accordance with the general interest.

- Article 6: Entitlement to a fair and public hearing in the determination of a person's civil and political rights. This includes property rights and can include opportunities to be heard in the consultation process.

- Article 8: Protects the right of the individual to respect for private and family life

10.6 The European Court has recognised that "regard must be had to the fair balance that has to be struck between the competing interests of the individual and of the community as a whole". Both public and private interests are to be taken into account in the exercise of the Council's powers and duties. Any interference with a Convention right must be necessary and proportionate.

10.7 The Council must consider whether its actions would infringe the human rights of anyone affected by the making of the CPO. So, it must carefully consider

the balance to be struck between individual rights and the wider public interest.

10.8 In this case it is considered that there is a compelling case in the public interest for the CPO. The public interest is served by demolition of unsafe buildings and the future qualitative housing gain outweighs the necessary interference with the private rights and interests. The benefits derived by owner occupiers from being relocated from unsafe to safe homes mitigates and justifies the interference with their private rights.

10.9 In addition, the individuals affected by the order have the right to object and have their objection heard at a public inquiry and, additionally, appropriate compensation will be available to those entitled to claim it under the relevant provisions of the CPO Compensation Code.

10.10 Therefore, it is considered that in making the CPO the Council has struck a fair and proportionate balance between the interests of those whose Convention rights will be affected and the wider public interest.

10.11 Section 149 of the Equalities Act 2010 requires the decision maker meaning the Council acting through its Cabinet, to have due regard to the goals in the Act as set out in section 149. An EqIA has been undertaken on the potential impact of the decision on residents with protected characteristics. This will be reviewed and updated as more information becomes available. The Council and its advisers will take account of the PSED and any impact on any parties with protected characteristics whilst undertaking negotiations to acquire interests.

10.12 Officers must ensure that any processing of personal data in connection with the Compulsory Purchase Order complies with the provisions of the Data Protection Act 2018.

10.13 Pursuant to section 13 of the Compulsory Purchase Act 1965, the Council may issue a warrant to the sheriff or enforcement officer to deliver possession of land for which it is authorised to enter on and take possession of, in the event that ‘the owner or occupier of any of that land, or any other person, refuses to give up possession of it, or hinders the acquiring authority from entering or taking possession of it’. Furthermore, the Council may recover costs from the person refusing entry.

10.14 In considering whether to confirm such a compulsory purchase order the Secretary of State will wish to know, amongst other things:

- what the identified defects in the order property are
- what other steps the authority has taken to remedy matters and the outcome
- where relevant, the extent and nature of any works carried out by the owner to secure the improvement and repair of the property
- whether the purpose for which the Council is proposing to acquire the land could be achieved by any other means
- whether the Council has the necessary resources to carry out the compulsory purchase and whether there are any other impediments to implementation

- the Secretary of State will also wish to know the authority's proposals regarding any existing tenants of the property
- the Secretary of State must also be satisfied that acquisition will achieve a quantitative or qualitative housing gain

10.15 The above aspects have been considered in the main body of this Cabinet Report which includes the legal basis of proceeding with the use of compulsory purchase powers. Human Rights and Equality Act considerations have also been addressed.

10.16 The making of a CPO is an executive function by virtue of section 9D of the Local Government Act 2000 and the Local Authorities (Functions and Responsibilities) (England) Regulations 2000. Pursuant to section 9E(2) of the Local Government Act 2000, the Cabinet may arrange for the discharge of an executive function by an officer of the authority.

11 Equality

11.1 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

11.2 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.

11.3 The proposed decision is to authorise the making of a compulsory purchase order (CPO) to enable the Council demolition of the Tangmere and Northolt blocks on the Broadwater Farm estate and the erection of new housing accommodation on the site. The objective of the decision is to ensure the safety of residents who continue to live in the two blocks. Residents approved the demolition of the blocks via consultation during 2018, and the CPO is now necessary to ensure this can be delivered. Those affected will be the leaseholders and secure tenants who remain in the blocks.

11.4 An equality impact assessment has been carried out for the proposed decision and is appended to this report. This sets out in detail the extent to which those affected by the proposed decision share the protected characteristics, the nature of the impacts of the proposed decision on them, and the mitigations that the Council has in place to prevent and minimise any potential negative impacts. This assessment contains the information required by Cabinet to understand the effects of the proposed decision on the aims of the public sector equality duty.

11.5 The Council has prepared an Equalities Impact Assessment for the project which identified that the Order may potentially have a detrimental effect or disproportionate impact on persons who share a relevant protected characteristic in terms of families with young children, individuals with disabilities/medical conditions, and the elderly. These parties will likely face greater challenges in relocating and relocation may have a greater impact on their family life. However, the Council has balanced these potential equality impacts against the benefits of the scheme and benefits realised by these parties in being relocated from unsafe to safe housing. The Council has concluded that the decision to make the CPO is proportionate and justified in the circumstances. The Council has also adopted a number of measures to mitigate the impact of the Scheme including:

- Provision of a shared equity scheme for qualifying residents which is in excess of the statutory compensation entitlement and enables residents to stay within the local area.
- A discretion panel to consider offers outside of adopted policies, including the offer of a social tenancy with compensation and consideration of shared equity on out of borough purchases.
- Assistance and support in locating and securing alternative suitable alternative accommodation
- Provision of compensation for special adaptations required for elderly or disabled leaseholders.
- When undertaking negotiations to acquire leasehold interests, an early part of the process involves identifying any protected characteristics. The appointed surveyor then ensures that negotiations are undertaken with regard to the Council's PSED obligations.
- The Tangmere Rehousing Priority Scheme adopted in June 2018, the Broadwater Farm Rehousing and Payments Policy adopted in January 2019, and the Acquisition Strategy adopted in July 2020 for affected residents has been prepared having regard to the Council's PSED obligations. Equalities Impact Assessments for June 2018 and November 2018 Cabinet respectively considered the Tangmere Rehousing Priority Scheme and Broadwater Farm Rehousing and Payments Policy.
- Secure tenants' housing assessment is in accordance with this PSED and they are offered a new home suitable for their needs. This includes taking account of any protected characteristics, for example elderly or disabled secure tenants requiring special adaptations will be eligible to claim for these costs or the adaptations will be made to the new dwelling.
- The Council's Equal Opportunities Policy provides a clear statement on the Council's commitment and approach to equality, diversity, and inclusion, in the areas of employment, service delivery and procurement. This policy underlies the Council's approach to delivering the scheme.
- When developing design proposals and granting planning permission for the future redevelopment of the Order Land the Council will take account of its PSED duty".

11.6 It is notable that the equality impact assessment finds that older people, BAME people, and disabled people are overrepresented among those residents remaining in Tangmere and Northolt blocks. Numerous measures are in place to mitigate any potential negative short-term impacts, informed by extensive engagement with residents, including the Broadwater Farm Rehousing and

Payments Policy, the Local Lettings Policy, and measures within the Acquisition Strategy. It concludes that while there may be short-term disruption, the impact of the decision will be positive in the long-term as it will help to ensure the safety of the people who remain in the blocks.

11.7 The Council recognises that the rehousing of single mothers can be a particularly negative experience for those individuals and their families due to support networks that often exist in the local area, along with access to local facilities and proximity to places of work. As noted in the EQIA for demolition in November 2018, 92% of lone-parent households in West Green were headed by women. To offset these potential negative impacts a number of important mitigations have been made:

- Financial assistance set out in the Broadwater Farm Rehousing and Payments Policy (explored in the November 2018 EQIA)
- Equity loans – enabling leaseholders to purchase similar properties in the local area
- Social tenancies as set out in the Acquisition Strategy from July 2020
- Practical support in finding a new property
- Flexibility and a discretion panel to consider requests outside of the current policies, to find suitable solutions for those particularly ill effected by rehousing

12 Use of Appendices

Appendix 1: Draft Statement of Reasons

Appendix 2: (a) Order Schedule Draft - This appendix contains exempt information relating to section 12A of the local government act 1972 - Paragraphs 1,2 , and 3

Information relating to any individual

Information which is likely to reveal the identity of an individual

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Appendix 2(b) Order Map

Appendix 3: Equalities Impact Assessment

13 Local Government (Access to Information) Act 1985

Background documents:

- Broadwater Farm Cabinet report 14.07.2018
- Broadwater Farm Cabinet report 13.10.2018
- Acquisition Strategy Cabinet report 14.07.2020

THE LONDON BOROUGH OF HARINGEY
'TANGMERE AND NORTHOLT COMPULSORY PURCHASE ORDER 2020'

HOUSING ACT 1985
ACQUISITION OF LAND ACT 1981

STATEMENT OF REASONS

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1. Introduction

1.1 This is the Statement of Reasons for the making of the London Borough of Haringey (Tangmere and Northolt) Compulsory Purchase Order 2020 ('the Order') by the London Borough of Haringey ('the Council'). The Statement has been prepared in accordance with the 'Guidance on Compulsory purchase process and The Crichel Down Rules for the disposal of surplus land acquired by, or under the threat of, compulsion' (July 2019) ('the Guidance').

1.2 The Order, has been made by the Council as the acquiring authority under section 17 of the Housing Act 1985 (Document 1). The Order will enable the Council to acquire compulsorily the Order Land (listed in the Schedule to the Order and shown edged red and coloured pink on the Order Plan, being Document 2). The purpose of the Order is to facilitate the demolition of two housing blocks known as Tangmere and Northolt situated on the Broadwater Farm Estate, Tottenham N17 which have been identified as structurally unsafe together with the associated substations in both blocks and to deliver (as a minimum) a qualitative housing gain.

1.3 The Council recognises that a compulsory purchase order ('CPO') can only be made as a "last resort" and if there is a compelling case in the public interest, as is reflected in paragraphs 2 and 12 of the Guidance. The Council has given careful consideration to all relevant issues and, having done so, is satisfied that there is a compelling case in the public interest to make the Order and that compulsory purchase is justified as a last resort.

1.4 It is intended that, unless acquired by agreement, all land and rights in the Order Land would be acquired by the Council following confirmation of the Order. Following confirmation, it is envisaged (subject to the necessary legal agreements being in place) that CPO powers will not need to be exercised to acquire the UK Power Network (UKPN) interest in respect of the substations which are currently being used for the purposes of carrying out their undertaking. Currently, relocation of both substations has been agreed between the parties, and is subject to the legal agreements being finalised. The Council will also consider granting equivalent or alternative rights of way should that be necessary for any part of the Order Land.

1.5 This Statement of Reasons is a non-statutory document. It is provided in accordance with section 6 of Tier 2 and section 12 of Tier 3 of the Guidance.

1.6 The Council has commissioned comprehensive structural surveys to fully consider the condition of both Tangmere and Northolt. The initial surveys were

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carried out by Ridge from October 2017 and Curtins were then engaged to peer review those findings in June 2018. These surveys identified serious structural defects giving rise to significant safety issues. The Council was advised that it had only two options: either (1) to carry out extensive refurbishment, or (2) to demolish both blocks.

1.7 Construction consultants Ridge undertook the structural surveys of all 12 blocks (including Tangmere and Northolt) on the Broadwater Farm estate on behalf of Homes for Haringey from October 2017 which were subsequently peer reviewed by Curtins as referenced at paragraph 1.6 above. The findings were that both the Tangmere and Northolt blocks failed the lower test of 17 kN/m^2 relating to the ability to withstand the force of a vehicular strike to the building or from a bottled gas explosion. As part of Ridge's work, estimated costs for strengthening and refurbishing both blocks were produced – these showed that the costs of refurbishment were prohibitively high without delivering the desired qualitative gain in the quality of housing in the blocks. Although these works could make the buildings safe in the medium term, the Council would still be left with two defective blocks requiring high on-going maintenance costs. As a result, the Council undertook a Section 105 consultation with residents on the preferred option to demolish the two blocks. The vast majority of respondents from both blocks (as noted in the Cabinet report from November 2018, 91% in Tangmere and 81% in Northolt supported the proposals) supported the demolition of Tangmere and Northolt and the re-provision of at least the same number of socially rented homes.

1.8 Following consideration of options and the consultation process (under section 105 of the Housing Act 1985) with the remaining residents and privately held homes in both blocks, the Council's Cabinet resolved to pursue the demolition of the blocks on the 13th November 2018 (document X). On the 13th November 2018 Cabinet resolved to replace 'any Council homes which were demolished with new Council homes on the estate' as a minimum. Given the quality of the current homes, this would represent a qualitative housing gain as a minimum. The Council will also explore all options to deliver a quantitative gain if possible.

1.9 The Council has attempted to acquire the interests from the owners and occupiers of those properties falling within the Order Land to facilitate the required demolition and redevelopment since the decision to demolish in November 2018. This is demonstrated by the Broadwater Farm Rehousing and Payment Policy approved by Cabinet in November 2018 and the Acquisition Strategy agreed by Cabinet in July 2020 which, among other provisions, expanded the existing equity loan offer. To date [18] interests have been secured with [19] leasehold interests remaining. As of 29th September 2020,

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agreement had been reached for the sale of 10 of the remaining leasehold interests, with sales to be finalised. Mindful of the structural concerns regarding the 2 blocks, the Council has made the decision that demolition needs to be prioritised and that negotiations to acquire will be continued in parallel with the CPO process.

1.10 Redevelopment will be based on the Council's established policy objectives of maximising the amount of genuinely affordable housing with detailed proposals to be developed in consultation with the community, in accordance with all relevant planning policies and in accordance with section 17(4) of the Housing Act 1985.

1.11 The Council resolved by way of a resolution of the Cabinet on [October 13th 2020] to make the Order (Document X).

2. Background - The Order Land

2.1 The Order Land comprises
(1) Northolt consisting of 102 flats and an adjoining building housing an energy centre
(2) Tangmere consisting of 116 flats and under croft parking spaces
(3) UKPN substations in the base of (i) Tangmere block and (ii) the base of Northolt block

2.2 Full details of the interests to be acquired are listed in the Schedule (CPO Schedule) annexed to the Order and shown on the map accompanying the Order (the Order Plan). The outstanding interests within the Tangmere and Northolt blocks are included within the Order. Council secure tenants in occupation are included within the Order. However, the Council can, and is securing, vacant possession through tenancy provisions. If necessary, the Council is confident of securing vacant possession from its secure tenants by way of possession proceedings under Ground 10A of Schedule 2 of the Housing Act 1985.

2.3 Tangmere and Northolt are 6 and 18 storey large panel system (LPS) point blocks built in the late 1960's and early 1970s forming part of the Broadwater Farm Estate. There are currently 218 residential flats in total in both blocks and the floor space within Tangmere in particular is underutilised.

2.4 The Order Land currently constitutes part of a social housing estate known as the Broadwater Farm estate. With respect to the demolition and replacement of affordable housing, draft London Plan Policy H10 requires the replacement of the affordable housing on an equivalent floorspace basis. Where the

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demolition involves social rented housing, this tenure is to be replaced, facilitating a right of return for existing tenants, otherwise it may be re-provided as either social rent or London Affordable Rent housing. The policy requirement for an uplift in overall affordable housing provision is only relevant to estate intensification proposals.

2.5 The two blocks do not currently constitute safe or good quality homes and are located in a physical environment designed around now disregarded post war Brutalist design theory. The re-provided homes will provide new safe and good quality homes, delivered in an improved physical environment with the new buildings designed to interface with the adjoining streets and public spaces. Therefore, the proposed redevelopment will achieve the key aims of estate renewal schemes as identified at policy H10. They will also represent a qualitative housing gain.

2.6 The Council's approach accords with the key relevant principles of the Government's National Estate Regeneration Strategy. However, as outlined above, the justification and need for this scheme differs from an estate renewal project. Namely, the scheme is justified on the basis that:

1) the blocks are unsafe and pose a risk of progressive collapse both to inhabitants and the surrounding areas;

2) the cost of the buildings remaining represents poor value for money due to the prohibitively high cost of refurbishment and structural works;

3) the Council cannot deliver its commitments to rebuilding the new homes until demolition of these two blocks has been undertaken.

2.7 On the basis of the above, the Council is satisfied that eliminating the risks associated with the two structurally unsound buildings accords with the Council's obligations as landlord, local housing authority and local planning authority. The provision of a qualitative housing gain (as a minimum) also accords with the Councils' established policies and the planning framework.

3. Enabling Powers for the Compulsory Purchase Order ("CPO")

3.1 The Council has made the Order pursuant to its powers under Part 2, section 17 of the Housing Act 1985 (the Act) (and the Acquisition of Land Act 1981 and Planning and Compulsory Purchase Act 2004) (as amended) to acquire land for housing purposes.

3.2 Section 17 allows the local authority to acquire houses, or buildings which may be made suitable as houses, together with any land occupied with the houses or buildings.

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3.3 Section 17(3) of the Act provides that Land may be acquired by a local housing authority for the purposes of this Part by agreement, or they may be authorised by the Secretary of State to acquire it compulsorily.

3.4 Section 17(4) of the Act provides that a local housing authority may, with the consent of, and subject to any conditions imposed by, the Secretary of State, acquire land for the purposes of this Part notwithstanding that the land is not immediately required for those purposes; but an authority shall not be so authorised to acquire land compulsorily unless it appears to the Secretary of State that the land is likely to be required for those purposes within ten years from the date of the confirmation of the compulsory purchase order.

3.5 The Council's Cabinet has authorised on [13th October 2020] the making of the Order (pursuant to S.17 of the Housing Act 1985) with budgets in place to meet the costs of promoting the CPO including costs arising in the event of a public inquiry being required, through to implementation (as may be necessary), dealing with all compensation payments and associated aspects in conjunction with the proposed demolition and building of new homes. The costs associated with acquiring remaining assets and to procure design consultants have been dealt with previously, with £11.5m approved by Cabinet in June 2018, £1.2m approved by Cabinet in November 2018. Architects were appointed in December 2019 to develop designs for the new homes and an Urban Design Framework for the estate. Further to this, as noted in the Acquisition Strategy paper adopted by Cabinet in July 2020, provision has been made within the BWF Capital Budget 2020/21 to cover any supplemental acquisition and rehousing costs.

3.6 The resolution made by the Council's Cabinet in November 2018 seeks to achieve a qualitative housing gain as a minimum.

4. Strategic Context of Housing in Haringey

4.1 The Council's Borough Plan (2019-2023) outlines the Council's overall strategic objectives for housing, setting it as Priority 1 for the borough. It sets out a vision to *"deliver the new homes Haringey needs, especially new affordable homes."* and to *"drive up the quality of housing for everyone".* The Borough Plan overall supports the key objectives of the Order to ensure the safety of the residents within the two blocks and also the surrounding neighbouring housing. The Borough Plan also supports the subsequent residential redevelopment of the Order Land.

4.2 The strategic planning framework on the making of the Order consisted of the following key documents: • London Plan 2016; • *London Borough of*

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Haringey (2017) Local plan; (2017) Development Management DPD (2017) Site Allocation DPD • The National Planning Policy Framework (NPPF) 2019

4.3 The NPPF is a material consideration. It seeks to ensure that in the pursuit of sustainable development, the three-overarching economic, social and environmental objectives are delivered through the implementation of plans and the application of policies. Section 2 paragraph 8b seeks safe built environments as a key social objective of achieving sustainable development. The NPPF seeks to deliver a sufficient supply of homes, significantly boosting the supply of homes and ensuring that land suitable for housing is developed without unnecessary delay.

4.4 The London Plan (2016) provides the strategic context for housing need in London. This provides a target of 15,019 new homes for the Borough for the period of 2015 to 2025.

4.5 The new draft London Plan was published for consultation in December 2017 and the Examination in Public commenced in January 2019. It is currently estimated that the final version of the London Plan will be published in 2020 to replace the 2016 plan.

4.6 The draft new London Plan places an increased emphasis on the need to deliver new homes increasing the pan-London housing target and many boroughs' individual targets. It significantly increases the borough-wide 10-year minimum housing target for the borough of Haringey to 15,920, between 2019 and 2029. This yields an annualised target for the borough of Haringey of 1,592 homes

4.7 In order to achieve the Council's strategic housing target, it is important that as well as provision of new housing there should be no net loss of the existing housing stock through change of use or redevelopment for other uses.

4.8 The relevant policies of the development plan (London Plan (2016) Policy 3.14; draft London Plan Policy H10; and Local Plan Policy H02) all require there to be no net loss of permanent residential accommodation as a result of demolition, redevelopment or change of use without replacement provision (as measured by equivalent floorspace). The policy position in Policy H02 is reinforced in Local Plan Policy DM10 which resists the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace. These policies do not come with any prescribed mitigation measures to offset the loss of housing other than the replacement of what has been lost.

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4.9 The Council considers the Order Land to be capable of delivering a housing scheme which will result in no net loss of housing, whilst also achieving a significant qualitative housing gain; there is also potential to deliver a quantitative housing gain. The commitment to the re-provision of housing and delivery of qualitative (and potentially quantitative) housing gain following confirmation of the Order thus accords with adopted policy.

5. The Local Housing Market in Haringey

5.1. There are approximately 107,700 households in the borough of Haringey, and this is projected to rise to 109,412 by 2022 (ONS, 2018). At the last census, 40% of households were owner-occupiers; 33% lived in the private rented sector and 27% lived in the social rented sector.

5.2 As noted in the section above, there is a clear need for more housing of all sorts in the borough, with a target of over 15,000 new homes over a ten-year period (2019-2029). There is also a pressing need for more social rented homes in the borough. There are over 11,000 households on Haringey's housing register, who need to be housed in social housing, of whom c. 3000 are currently homeless and living in temporary accommodation. The Strategic Housing Market Assessment completed in 2014 identified an affordable housing requirement of 11,757 homes over the 2011-2026 period. The Council's priority is for new affordable housing to be low-cost rented housing since this best meets the needs of the borough's residents.

5.3 Haringey Council is the landlord of c15,000 Council rented homes in the borough; there are c.3000 additional social rented homes in Haringey. Given the clear demand for social rented homes in the borough, evidenced by the housing register and the number of households in temporary accommodation, and the 2014 SHMA and the early findings of the SHMA currently in development, there is clearly a need for an increase in social housing in the borough.

5.4 Therefore, failure to demolish the two blocks and to deliver this scheme with new homes providing a qualitative gain would result in a net decrease of social rented housing which the Council owns in the borough. This would increase pressure on the Council to deliver the housing needed within the borough of Haringey. Making the CPO, enabling the demolition of the structurally unsound blocks will enable social housing to be delivered. This will deliver at least the same number of socially rented homes as are to be demolished and represent a qualitative gain in housing.

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6. Outline of the Authority's purpose in seeking to acquire the land

6.1 The Council's purpose in making the Order is to acquire all third-party interests in the Order Land to enable the demolition of Tangmere and Northolt and associated structures noting the two substations (with the proposal to relocate both substations in the vicinity being agreed with the statutory operator, currently subject to legal agreements being entered into). This is to achieve the key objective of replacing the Council homes, as set out in the Council's Cabinet Report of 13th November 2018. Further to this, the demolition will:

1) remove blocks that are unsafe and pose a risk of progressive collapse both to inhabitants and the surrounding areas;

2) avoid the poor value for money and prohibitively high cost of refurbishment and structural works;

3) enable the delivery of the replacement Council homes as agreed in November 2018.

6.2 The two blocks were identified in 2018 as in need of significant repair or demolition as soon as reasonably practicable in a survey carried out by external consultants, Ridge. Both blocks failed the lower 17kN/m^2 test. Following consultation and consideration of alternatives, the Council's Cabinet resolved to demolish the two buildings. The Cabinet decision of [13th October 2020] approved the Council's making of a Compulsory Purchase Order under Section 17 of the Housing Act 1985 to acquire the third-party interests in the Order Land.

6.3 Since the uncovering of these structural defects, mitigation measures have been put in place to minimise risks. The mitigation measures include a 24-hour concierge to ensure no bottled gas is brought into the buildings and the removal of piped gas from Tangmere. Additional to this, three key pieces of policy were adopted to enable the Council to rehouse secure tenants and achieve acquisition of leasehold interests by agreement. These are the Tangmere Rehousing Priority Scheme (adopted in June 2018), the Broadwater Farm Rehousing and Payments Policy (adopted in February 2019) and the Acquisition Strategy (adopted in July 2020). Despite extensive negotiations spanning over 2 years, and with the ongoing cost of securing and maintaining the blocks, it would not be reasonable for there to be further delays to the demolition of the blocks.

6.4 The Council's intention is that the Order Land will be used for housing following confirmation of the Order, with detailed proposals to be developed in consultation with the community for delivery of the new replacement housing and in accordance with section 17(4) of the Housing Act 1985.

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6.5 In December 2019 a design contract was awarded to Karakusevic Carson Architects (KCA) after a competitive process to design new homes to be constructed on the Order Land and an urban design framework for the whole of the Broadwater Farm estate. The programme includes extensive engagement with residents on the new homes and urban design framework. As of August 2020, KCA have completed RIBA stage 0 and stage 1 of their work on the new homes and the urban design framework.

6.6 In parallel with the Order, the Council will continue to seek to acquire any outstanding third-party interests in the Order Land by agreement in accordance with paragraph 2 of the Guidance. Upon exercise of a confirmed Order and acquiring all third-party interests, the Council will demolish the two buildings. The remaining interests to be acquired pursuant to the Order are listed in the Schedule of Interests.

6.7 The new buildings will be built to current building regulations and an urban structure which ensures the buildings interface with the adjoining streets and public spaces. Therefore, the new housing stock will represent a significant qualitative improvement to the housing stock and amenity. The Council will also explore options to deliver a quantitative housing gain on the Order Land and the surrounding vacant land.

6.9 The Council's justification for the Order is set out further in Sections 8 and 12 of this Statement of Reasons
6.9 Therefore – to minimise the risk to remaining residents and surrounding areas from progressive collapse of the two buildings, achieve value for money for residents, and begin the development of the order land – it is necessary to pursue the CPO at this time.

7. The Scheme

7.1 The Scheme consists of:
• *The demolition of the structures within the Order Land;*
• *The redevelopment of the Order Land and surrounding land to deliver a qualitative housing gain.*

7.2 The primary purpose of the scheme is to address significant structural concerns within the two housing blocks within the Order Land.

8. Justification for Compulsory Purchase

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8.1 The Council considers that there is a compelling case in the public interest for the Order as outlined below. The Human Rights and Equality Act considerations arising are set out in section 12 below.

8.2 Tangmere and Northolt are a 6 and a 18-storey block located on the Broadwater Farm estate in the West Green Ward of the London Borough of Haringey. They were built using a method called a Large Panel System (LPS). This was the same construction method used at Ronan Point, Newham when in 1968 a gas explosion caused the partial collapse of the building and resulted in 4 deaths.

8.3 In 2018 Homes for Haringey, the Council's ALMO, engaged Ridge to undertake intrusive surveys to 4 void properties in Tangmere and Northolt and this survey was published on the Homes for Haringey's website in June 2018. The survey identified that it was safe for residents to remain at Tangmere and Northolt in the short-term (providing additional safety measures were put in place) but extensive strengthening work was required to make the blocks habitable in the long-term. The buildings failed when tested for resistance to disproportionate collapse in the event of an accidental explosion.

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8.4 To validate these findings, in June 2018 Homes for Haringey appointed Curtins to peer review Ridge's work, ensuring that their findings were robust. This confirmed that Tangmere and Northolt blocks failed the lower test of 17 kN/m^2. It was found that both buildings were at risk from progressive collapse in the event of a small explosion or impact (e.g. from a vehicle) and that Northolt presents a danger to the surrounding area and roads in such a circumstance.

8.5 Ridge carried out further visual surveys in June 2020 and confirmed that the original findings remained accurate, with some minor deteriorations identified in Tangmere since the initial surveys were undertaken.

8.6 A meeting with residents was held on 12th February 2018 to explain the implications of the structural surveys for residents of Tangmere and Northolt. The immediate impact was to ensure the short-term safety of residents, by removing piped gas from Tangmere, introducing 24-hour concierge at both blocks, and banning bottled gas from being brought into the buildings.

8.7 Further engagement and communications took place – including door-knocking, drop-in sessions, letters, and 1-1 meetings – until almost all residents had been directly in contact with Homes for Haringey staff. This was to ensure that all were aware of the structural issues, measures being taken to mitigate risk, and the options being considered.

8.8 The structural assessment of Tangmere and Northolt was used for the basis for calculating the costs of refurbishing the blocks, which would address:

1. The structural defects of the buildings
2. Full internal reinstatement works including mechanical and electrical, new bathrooms, kitchens, full re-decoration and new floor coverings
4. Making good works externally including complete over cladding
5. And bring the flats to a decent homes' standard.

8.9 Any refurbishment option would be extensive and highly intrusive. It would be impossible to undertake this work with residents remaining in the blocks. Residents would have to be rehoused for the duration of the works. As well as the disruption there would be a significant cost of refurbishing the blocks, part of which would have to be met by leaseholders. Even with structural repairs, the LPS system would remain an inherent problem.

8.10 In 2018, the Council commissioned Ridge Partners to provide cost estimates for addressing the structural defects identified. The cost of addressing

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the structural elements is estimated at £25.6 million for both blocks. The total refurbishment costs, to bring the flats in the two blocks up to the Decent Homes Standard, would be over £33 million. This equates to £164,000 per flat in Tangmere and £145,000 per flat in Northolt. These figures exclude rehousing costs, asbestos removal and professional fees which would add further costs.

8.11 If refurbishment was undertaken, leaseholders would need to contribute their share of this cost on account of their lease obligations. This would place a significant financial burden on the leaseholders. Although such investment would preserve or increase the value of any leaseholders' interest, the refurbishment would not resolve the inherent problems with large panel construction which render such units very difficult or impossible to readily individually mortgage. Such factors have a significant negative impact on property value, reducing the potential for value growth to mitigate the financial burden which would arise for leaseholders if refurbishment was pursued.

8.12 The costs of undertaking refurbishment would therefore be prohibitively high and impact on the rest of the HRA and the Council's ability to fund other required capital schemes and investment and, despite this expense, it would not resolve the underlying issues with LPS construction.

8.13 Additional to significant rehousing and acquisition costs, the buildings remaining despite the resolution to demolish represents poor value for money for residents. This is because 24-hour concierge and security are required to ensure the safety of the blocks, maintenance and repairs are still necessary, and there are ongoing costs associated with supporting the residents that remain in the blocks.

8.14 The Council considered the nature of the structural failings in the buildings, how the LPS structural deficiencies would subsist even after repair, the disruption to residents from a repair option, and the financial cost to leaseholders and the Council. These matters were compared to the alternative issues and costs associated with demolition and redevelopment to deliver a qualitative housing gain. Having considered these alternatives, the consultation response, an Equalities Impact Assessment and the Council's PSED, the Council concluded that demolition represents the most proportionate and appropriate solution to address the structural failings within the two blocks. This decision was taken by Cabinet in November 2018.

Consultation

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8.15 The Council undertook consultation with all residents about the future of the blocks. There is a statutory obligation in Section 105 of the Housing Act 1985 on the Council to consult with all secure tenants on a proposal to demolish the blocks, this obligation has been met. The consultation was also extended to leaseholders in both blocks.

8.16 This statutory consultation was made accessible through translators and translations, large print, braille, door knocking, and regular drop-in sessions to ensure that all residents were consulted on the future of the blocks. The consultation explained to residents they would have to be rehoused whether the blocks were refurbished or demolished and explained the Council's preferred option to demolish the blocks because of:

1. significant health and safety concerns which must be addressed,
2. the costs of refurbishing the blocks to address the health and safety concerns would have a major impact on the Housing Revenue Account, and limit investment in other homes.
3. *the Council wants to be able to rehouse residents appropriately.*

8.17 The consultation started on September 12th 2018 and closed on October 10th 2018.

8.18 The consultation questionnaire was distributed to all Tangmere and Northolt residents. Each consultation included a free-post return envelope, as well as information on replying via email. The materials were provided in multiple languages, large print, and braille as needed. Drop in events were also used as well as door knocking. 6 drop-in sessions were run by Homes for Haringey, with further sessions run by the Independent Tenant Leaseholder Advisors. Additionally, through a needs assessment Homes for Haringey identified the need for translators at drop-in sessions and this was made available for residents that needed it.

8.18 91% and 81% of responses were supportive of the proposal to demolish Tangmere and Northolt respectively. A total of 108 responses were received from 105 of the 206 properties (51%). Tangmere had a response rate of 40% (42 of 104 properties) whilst Northolt had a response rate of 62% (63 out of 102 properties). Tangmere's response rate was lower due to the fact that many Tangmere residents had already agreed moves away at the time of this consultation under the Tangmere Rehousing Priority Scheme adopted by Cabinet in June 2018.

8.19 In June 2018 the Council firstly began working with tenants and leaseholders in Tangmere to be rehoused. Tangmere residents were rehoused as

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a matter of urgency due to the fact that piped gas needed to be turned off to the building as soon as practically possible to reduce the danger of collapse. The Council did not want to have residents living in a block with no gas and therefore approved a Tangmere Rehousing Priority Scheme in June 2018 to begin this process as soon as possible. In February 2019 the Council began working with tenants and leaseholders in Northolt to be rehoused. Due to Northolt not having piped gas, the Council opted to develop a Broadwater Farm Rehousing and Payments Policy and undertake a full S105 consultation on this policy and the demolition before beginning the rehousing of Northolt residents. The Broadwater Farm Rehousing and Payments policy also applied to Tangmere residents retrospectively.

8.20 On 13th November 2018, the Council resolved to pursue demolition of the blocks in light of the consultation response and structural condition of the two blocks.

8.21 The consultation papers also set out the rehousing and payments policy to residents on how they would be supported in leaving Tangmere and Northolt. It was made clear that this would be required under either option of demolition or refurbishment. The Broadwater Farm Rehousing and Payments policy included provisions for leaseholders to be paid full market value for their properties, home loss payments, disturbance payments, basic loss payments, a right to return, equity loans and more.

8.22 In July 2020, the offer for leaseholders was extended in an attempt to speed up acquisition by agreement and respond to the needs of the remaining 19 leaseholders. This new Acquisition Strategy expanded equity loans to be considered for out-of-borough purchases and introduced an option for a social tenancy to certain vulnerable leaseholders.

8.23 These policies have been updated and expanded to respond to the needs of tenants and leaseholders in both blocks, with a clear desire to acquire all interests by agreement. A discretion panel was also set up and has, as of 29th September 2020, considered claims outside of policy for [6] leaseholders. In all, this demonstrates a clear willingness on behalf of the Council to acquire all interests by agreement.

8.24 Additional to this, the Council has reached an agreement for the relocation of UK Power Network's (UKPN) interests in the 2 substations. These interests have been included in the order schedule as the new leases are yet to be finalised. It is not envisioned that the Council will need to exercise confirmed CPO powers to acquire these interests.

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8.25 The primary need for the Order is to enable the demolition of the buildings, to ensure the safety of the residents and those in neighbouring properties. The Order will also enable money currently being spent on securing Tangmere and Northolt to be directed elsewhere and ensure the delivery of a significant qualitative gain in housing stock when the two sites are redeveloped.

9. Negotiations for the acquisition of third-party interest and rights over the Order Land/Proposals for rehousing displaced residents

9.1 The Council has been actively pursuing the acquisition of third-party interests in the Order Land. Negotiations to acquire interests commenced substantively in June 2018 following the adoption of the Tangmere Rehousing Priority scheme.

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9.2 The immediate rehousing of Tangmere secure tenants was undertaken via provisions in the Tangmere Rehousing Priority Scheme, adopted by Cabinet in June 2018. This was due to the urgent need to remove piped gas from Tangmere, making the building less habitable. In comparison, rehousing Northolt residents commenced approximately 8 months after the Tangmere block, as this block was not served by piped gas. To date, all secure tenants have been rehoused from Tangmere and 5 secure tenants remain in Northolt.

9.3 Following the Cabinet resolution to demolish the buildings on 13th November 2018, the Council has continued to rehouse the remaining secure tenants. If necessary, the Council intends to obtain vacant possession of units within its ownership and occupied by secure tenants through possession proceedings under section 83 of the Housing Act 1985 and Ground 10A of Part II to Schedule 2 of that Act. As of [29th September 2020], [194] of the flats within the two blocks are vacant.

9.4 After the resolution to demolish in November 2018, the Council began to undertake negotiations to acquire the third-party leasehold interests in the Order Land. Since July 2020, the Council have also appointed Carter Jonas to assist with the outstanding negotiations with a view to reaching agreement.

9.5 The negotiations undertaken to date have been in accordance with the Broadwater Farm Rehousing and Payments policy, resulting in [18] leasehold interests being acquired and [5] secure tenants remaining in the blocks as of 29th September 2020.

9.6 This included a shared equity scheme to enable eligible owner occupiers to remain within the local area. This scheme also significantly exceeds the leaseholders' statutory entitlement to compensation. These offers have been made in order to reach agreement and to ensure owner occupiers are able to remain in the local area, if they wish.

9.7 On 14th July 2020 Cabinet approved an updated acquisition strategy that also allowed a discretion panel to consider shared equity loans out of the borough and an offer of a social tenancy in some cases (and financial compensation for the property). So far [6] individual cases have been considered by the discretion panel.

9.8 In 2018, the Council sought advice from GL Hearn and Carter Jonas as to the level of offers to acquire. The level of offers to acquire disregards the properties inherent structural failings and the current state of the property (e.g.

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not accounting for disrepair, leaks etc.) to ensure market level of offers can be made as far as reasonably possible.

9.10 Throughout the negotiation process leaseholders have been encouraged to instruct specialist professional advisers to act on their behalf, with the reasonable cost of this advice to be reimbursed by the Council. This includes paying for leaseholders to obtain third party valuations of their properties value.

9.11 As of [29th September 2020], of the [37] properties which were privately held at the commencement of the project, [18] have been acquired and agreement has been reached to acquire all except [9] of the [19] remaining privately held properties.

9.12 In order to secure timely demolition of the blocks and the safety of the residents and neighbours, the Council will continue undertaking negotiations in parallel with seeking compulsory purchase powers. It remains the Council's preference to secure interests by agreement. However, the Council believes that if a CPO is not pursued at this stage the delays to the demolition and rebuild programme will be of an unacceptable length and the risk to remaining residents and neighbouring areas will continue to be unsafe. Further to this, significant cost is associated with maintaining the two blocks as they stand and a commitment has been made by Cabinet on 13th November 2018 to re-provide an equivalent of Council homes.

9.13 The Council has taken account of its duties under section 149 of the Equality Act 2010 and is satisfied that due regard has been had to any potential disproportionate impact on any parties with protected characteristics and has instigated a number of measures to mitigate any potential negative impacts. This has been considered through three Equalities Impact Assessments undertaken in June 2018, November 2018, and October 2020. This issue and the approach to negotiations is considered further at section 12 below.

10. Planning position

10.1 The Order Land forms a significant previously developed brownfield site within an established residential area where there is significant need and demand for housing. The site is subject to a site allocation (SA61) for *improvements of the housing estate to improve stock, design of the site, and routes through the area* in the Site Allocation DPD (2017). The site allocation sets out that *The Council is required to ensure that all housing stock in the Borough that it owns and manages is of a decent standard and fit for habitation on an ongoing basis. Broadwater Farm is a Council housing estate within*

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which a range of alternatives regarding how the best provision of fit for purpose housing could be considered. This policy sets out the broad objectives that any future supplementary planning document/masterplan would be required to address in this area.

10.2 The Site Requirements of the Site Allocation include:

- Development will be required to be in accordance with a masterplan, prepared with the involvement of residents and the Canal and River Trust.
- The SPD will be prepared in consultation with existing residents and will assess existing issues within the area and options to address these have regard to the following:
    - the form, function and quality of existing buildings on site;
    - the potential for refurbishment;
    - the principles under which demolitions would be considered;
    - the different and distinct characteristics of areas within and adjacent to the Allocation area, including (but not limited to) Lido Square, Moira Place, and Somerset Close;
    - the management and maintenance arrangements;
    - the community groups active on the site and their aspirations and needs;
    - opportunities to further improve the urban realm across the site;

10.3 Where new development is proposed:

- the optimum quantum of development to be provided;
- the requirement to replace affordable residential floorspace in accordance with Policy SP2;
- the housing mix in accordance with Policy DM11 and Council's Housing Strategy; the achievement of a high-quality development that integrates with its surroundings;
- Housing decant considerations;
- the capacity of the existing community facilities to match any development, including existing shortfalls where they exist;
- the need to improve the transport accessibility of the site to serve the new development and the existing community, including public transport, cycling and walking, and alterations to the surrounding road network;
- consideration of feasibility and viability constraints;
- the delivery/implementation plan, including phasing strategy if necessary;

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- Have regard to the opportunity to deliver the objectives of the Thames River Basin Plan, in accordance with Regulation 17 of the Water Environment Regulations 2013.

10.4 The Development Guidelines of the site allocation are:

- There may be opportunities to link the open spaces in the area, particularly Lordship Recreation Ground, to benefit wider areas of the Borough through the Green Grid network.
- This site is identified as being in an area with potential for being part of a decentralised energy network. Proposals should reference the Council's latest decentralised energy masterplan regarding how to connect, and the site's potential role in delivering a network within the local area.
- Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place.

10.5 In parallel with the demolition programme the Council will work with the community to develop design proposals for redevelopment and improvement to provide a qualitative housing gain in line with the Site Allocation SA61 through a masterplan or SPD. The Site Allocation supports the redevelopment of residential blocks to ensure that homes are a decent standard and fit for habitation.

10.6 The Council will apply for and intends to obtain the necessary permissions, approvals and consents to deliver the qualitative housing gain within a reasonable time following confirmation of the Order.

10.7 The Council considers that there is no impediment to designing a residential development for the site which will accord with the site allocation and adopted policy, whilst also responding sensitively to the local context.

10.8 The Council considers the redevelopment of the site for housing accords with the adopted planning framework as identified at section 4 above.

10.9 Therefore, the Council sees no reason why planning permission will not be obtained for residential redevelopment achieving a qualitative and potentially quantitative housing gain on the Order Land and surrounding vacant land.

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11. Funding

11.1 The Council has considered the budget necessary for the acquisition of properties and subsequent demolition costs and associated compensation payments, and authorised £11.5m of Capital provision for rehousing on 26th June 2018, a further £1.2m on 13th November 2018 for Northolt rehousing, and further budget in the BWF Capital Budget 2020/21 for acquisition and demolition of the two blocks.

11.2 In February 2020, Cabinet approved the provision of £68 million in the Housing Revenue Account financial plan over the next 10 years. The demolition will be funded from this provision.

11.3 There is provision in the current Broadwater Farm budget as approved by Cabinet in February 2020 for the CPO process.

11.4 The Council is therefore satisfied that the costs of acquisition, rehousing residents and subsequent demolition of the two buildings in the Order Land can be met in full from internal resources.

11.5 In order to fund the redevelopment, the Council has access to funding from a number of additional sources. The precise need for and nature of the required funding will be determined as the project design develops. The Council will likely fund redevelopment of land through internal resources and if required has access to external funding including borrowing and funding opportunities arising from the GLA or Homes England.

12. Human Rights & Public Sector Equality Duty

12.1 The Human Rights Act 1998 ("the Act") incorporated into the UK domestic law the European Convention for the Protection of Human Rights and Fundamental Freedoms ("the Convention"). Section 6 of the Act makes it unlawful for a public authority to act in a manner which is incompatible with a Convention right.

12.2 The Convention rights engaged in the context of a compulsory purchase order are Article 1 of the First Protocol of the Convention and Article 8 of the Convention.

12.3 Article 1 of the First Protocol of the Convention states:

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"Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interests and subject to the conditions provided for by law and by the general principles of international law…"

12.4 Article 8 of the Convention provides:

"(1) Everyone has the right to respect for his private and family life, his home and his correspondence. [17]

(2) There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interest of the economic well-being of the country…"

12.5 The Courts have recognised, in the context of Article 1 of the First Protocol of the Convention, that regard must be had to the fair balance which has to be struck between the competing interests of those whose rights are affected and the community as a whole.

12.6 Similarly, any interference with the Article 8 Convention rights must be in accordance with the law and must be necessary and proportionate.

12.7 The Council has taken into account the impact of the Order on the Convention rights of those whose interests will be affected by the Order generally and through an Equalities Impact Assessment, appended to [13th October 2020's] Tangmere and Northolt CPO Cabinet report. In view of the factual background to the Order as set out in this Statement of Reasons, and the compelling justification for making the Order, the Council considers that the exercise of compulsory purchase powers in this case is justified because it is in the public interest, authorised by law and necessary and proportionate in order to achieve the Council's objectives of securing the safety of the buildings residents, neighbours and securing a future qualitative housing gain.

12.8 The Council has consulted with residents on the future of the two blocks and will consult with all residents of the wider estate on redevelopment proposals.

12.9 If the Secretary of State or Inspector confirms the Order, the compulsory acquisition of the interests in the Order Schedule will be necessary only if they have not already been acquired by agreement at a reasonable cost and within the timescales required to deliver timely demolition. As explained above, efforts to acquire the relevant interests are ongoing. Further, all those whose interests are compulsorily acquired will be entitled to fair compensation, such compensation

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to be determined independently by the Upper Tribunal (Lands Chamber) if it cannot be agreed.

12.10 The Council is therefore of the view that there is a compelling case in the public interest for the compulsory acquisition of each and every parcel of land comprised in the Order Schedule. It is also convinced that the public interest that is to be served by demolition of unsafe buildings and the achievement of a future qualitative housing gain outweighs the necessary interference with the private rights and interests that exist in the Order Land.

12.11 The Council also considers that the benefits derived by owner occupiers and occupying tenants from being relocated from unsafe to safe homes mitigates and justifies the interference with the same parties' private rights.

12.12 The Council therefore, believes that in making the Order it has struck a fair and proportionate balance between the interests of those whose Convention rights will be affected and the wider public interest.

12.13 Overall, the Council is satisfied for the reasons set out above that the CPO can lawfully be made and that the Order is a proportionate measure to achieve the Council's objectives in the public interest.

Equality Act 2010

12.14 All public authorities are bound by the Public Sector Equality Duty ('PSED') as set out in section 149 of the Equality Act 2010. In exercising their compulsory purchase and related powers the Council as acquiring authority must have regard to the effect of any differential impacts on groups with protected characteristics, namely:

- Marital or Civil Partnership Status
- Pregnancy / Maternity
- Sexual Orientation
- Sex
- Gender Reassignment
- Religion or Belief
- Race
- Age
- Disability

12.15 The Council, in the exercise of its public functions, has due regard to the need to:

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(a) eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act;
(b) advance equality of opportunity between people who share a protected characteristic and those who do not; and
(c) foster good relations between people who share a protected characteristic and those who do not.

12.16 As is set out above, the safety of residents, the building's neighbours and others using the space around the buildings is the primary concern of the Council.

12.17 The Council has prepared an Equalities Impact Assessment for the project which identified that the Order may potentially have a detrimental effect or disproportionate impact on persons who share a relevant protected characteristic in terms of families with young children, individuals with disabilities/medical conditions, and the elderly. These parties will likely face greater challenges in relocating and relocation may have a greater impact on their family life. However, the Council has balanced these potential equality impacts against the benefits of the scheme and benefits realised by these parties in being relocated from unsafe to safe housing. The Council has concluded that the decision to make the CPO is proportionate and justified in the circumstances. The Council has also adopted a number of measures to mitigate the impact of the Scheme including:

- *Provision of a shared equity scheme for qualifying residents which is in excess of the statutory compensation entitlement and enables residents to stay within the local area.*
- *A discretion panel to consider offers outside of adopted policies, including the offer of a social tenancy with compensation and consideration of shared equity on out of borough purchases.*
- *Assistance and support in locating and securing alternative suitable alternative accommodation*
- *Provision of compensation for special adaptations required for elderly or disabled leaseholders.*
- *When undertaking negotiations to acquire leasehold interests, an early part of the process involves identifying any protected characteristics. The appointed surveyor then ensures that negotiations are undertaken with regard to the Council's PSED obligations.*
- *The Tangmere Rehousing Priority Scheme adopted in June 2018, the Broadwater Farm Rehousing and Payments Policy adopted in January 2019, and the Acquisition Strategy adopted in July 2020 for affected*

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residents has been prepared having regard to the Council's PSED obligations. Equalities Impact Assessments for June 2018 and November 2018 Cabinet respectively considered the Tangmere Rehousing Priority Scheme and Broadwater Farm Rehousing and Payments Policy.

- *Secure tenants' housing assessment is in accordance with this PSED and they are offered a new home suitable for their needs. This includes taking account of any protected characteristics, for example elderly or disabled secure tenants requiring special adaptations will be eligible to claim for these costs or the adaptations will be made to the new dwelling.*
- *The Council's Equal Opportunities Policy provides a clear statement on the Council's commitment and approach to equality, diversity, and inclusion, in the areas of employment, service delivery and procurement. This policy underlies the Council's approach to delivering the scheme.*
- *When developing design proposals and granting planning permission for the future redevelopment of the Order Land the Council will take account of its PSED duty.*

12.18 It is notable that the equality impact assessment finds that older people, BAME people, and disabled people are overrepresented among those residents remaining in Tangmere and Northolt blocks. Numerous measures are in place to mitigate any potential negative short-term impacts, informed by extensive engagement with residents, including the Broadwater Farm Rehousing and Payments Policy, the Local Lettings Policy, and measures within the Acquisition Strategy. It concludes that while there may be short-term disruption, the impact of the decision will be positive in the long-term as it will help to ensure the safety of the people who remain in the blocks.

12.19 The Council recognises that the rehousing of single mothers can be a particularly negative experience for those individuals and their families due to support networks that often exist in the local area, along with access to local facilities and proximity to places of work. As noted in the EQIA for demolition in November 2018, 92% of lone-parent households in West Green were headed by women. To offset these potential negative impacts a number of important mitigations have been made:

- Financial assistance set out in the Broadwater Farm Rehousing and Payments Policy (explored in the November 2018 EQIA)
- Equity loans – enabling leaseholders to purchase similar properties in the local area
- Social tenancies as set out in the Acquisition Strategy from July 2020
- Practical support in finding a new property

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- Flexibility and a discretion panel to consider requests outside of the current policies, to find suitable solutions for those particularly ill effected by rehousing

12.20 The Council considered Equalities and Diversity issues when preparing the Cabinet Report making the decision to demolish the blocks and seeking authority to make the Order. The relevant Equalities Impact Assessment's for this decision were appended to the 'Tangmere and Northolt blocks on Broadwater Farm' report from Cabinet on 26th June 2018, the 'Broadwater Farm' report from Cabinet on 13th November 2018, and the 'Tangmere and Northolt CPO' report from Cabinet on 13th October 2020.

12.21 The future development will deliver an inclusive place for people of all ages, with a housing mix that reflects different life stages. The promotion of social cohesion, health and well-being along with the reduction of dependency will be fundamental principles guiding the redevelopment.

12.22 Overall, the Council has taken account of its duties under section 149 of the Equality Act 2010 and is satisfied that due regard has been had to any potential disproportionate impact on any parties with protected characteristics. The Council has instigated a number of measures to mitigate any potential negative impacts.

12.23 In addition, equality and human rights considerations will be considered throughout the CPO process including an updated equalities assessment to ensure impacts and mitigations are considered throughout the CPO process.

13. Conclusion

13.1 The Order is being promoted by the Council under section 17 of the Housing Act 1985, to acquire the ownership of third party interests in the Order Land, to enable the acquisition and demolition of what currently consists of two large panel construction blocks, under croft parking and two associated substations.

13.2 The Order is made primarily to ensure the safety of the residents within and the neighbours of the two structurally unsound buildings. Additional to this, the costs associated with the blocks remaining does not represent value for money for residents. The Order will enable the acquisition of third-party interests, facilitating the demolition and redevelopment of the land for the purposes of delivering a qualitative housing gain.

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13.3 The two blocks have been identified as structurally unsound and in need of demolition or major repair as soon as reasonably practicable by Ridge, with the findings peer reviewed and confirmed by Curtins. Following consultation and consideration of options, the Council resolved to demolish the blocks on 13th November 2018. The Order Land will be used for housing within a reasonable time following confirmation of the order, with detailed proposals developed in consultation with the community in accordance with section 17(4) of the Housing Act 1985.

13.4 The Council has considered alternatives and demolition represents the only realistic option to address the inherent structural failings in the two blocks. Demolition was also supported by the majority of residents in consultation undertaken in September and October 2018.

13.5 In view of the need to demolish the blocks as soon as reasonably practicable, the Council is undertaking negotiations to acquire interests by agreement in parallel with seeking statutory powers. The Council have demonstrated – through the Tangmere Rehousing Priority Scheme, the Broadwater Farm Rehousing and Payments Policy and the updated Acquisition Strategy – that acquisition by agreement is an option that is being exhausted. It remains the Council's preference to acquire by agreement, however compulsory purchase powers are likely to be required to ensure timely demolition.

13.6 The Council considers there is no impediment to the confirmation or implementation of the Order and achievement of the primary aim of the Scheme. Although a number of additional consents will be required to achieve the qualitative housing gain, these will not be needed to enable demolition. The Council sees no reason why these additional consents will not be obtained to enable redevelopment within a reasonable time following confirmation of the Order.

13.7 The Council is satisfied that there are no current planning or financial impediments to the implementation of the Order and that the demolition and redevelopment is therefore likely to proceed if the Order is confirmed. The Council has applied the advice in the Guidance and has set out above its view that the Order meets in particular the requirements of paragraph 14 of the Guidance.

13.8 For the reasons summarised in this statement, the purposes for which the Order Land is to be acquired could not reasonably be achieved by any other means. In addition, the Council considers the Order to be within the necessary

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statutory powers and that a compelling case exists for the making and confirmation of the Order.

13.9 Confirmation of the Order is sought on this basis.

14. Inquiry Procedure Rules and Documents to be referred to in the event of an inquiry

14.1 This statement of reasons is not intended to be a statement of case required under Rule 7 of the Compulsory Purchase by Non-Ministerial Acquiring Authorities (Inquiries Procedure) Rules 1990 (or discharge the Council's statutory obligations under Rule 7 of the Compulsory Purchase (Inquiries Procedure) Rules 2007).

14.2 In the event that it becomes necessary to hold a public inquiry into the Order, the Council may refer to or put in evidence the documents listed below. It should be noted that the Council reserves the right to add to or amend the list as necessary and may also refer to additional documents.

Document No.	Description
1	London and Northolt Compulsory Purchase Order 2020 ("the Order")
2	Order Plan
3	Council's Cabinet Report dated [13th October 2020]
4	Council's Cabinet Report dated [ ]

15. Other information of interest to persons affected by the Order

15.1 Parties affected by the Order who wish to discuss matters with a representative of the Council should contact:

15.2 Those parties affected by the Order who wish to discuss the purchase of their interest by agreement should contact:

15.3 The Royal Institution of Chartered Surveyors (RICS) operates a compulsory purchase helpline which provides initial free advice. Those parties wishing to make use of that service should contact RICS on 024 7686 8555 or via its website: www.rics.org

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16 Inspection of the Order and order documents

A copy of the Order and the Order Plan and other documents may be seen at:

(a) The Council's office at [ ] during normal working hours, by prior appointment by contacting [ ] on [ ] or email [ ]

(b) [Library] during normal opening hours.

(c) On the Council's website at [ ]

Dated this day of 2020

For and on behalf of Bernie Ryan (Assistant Director of Corporate Governance)

London Borough of Haringey

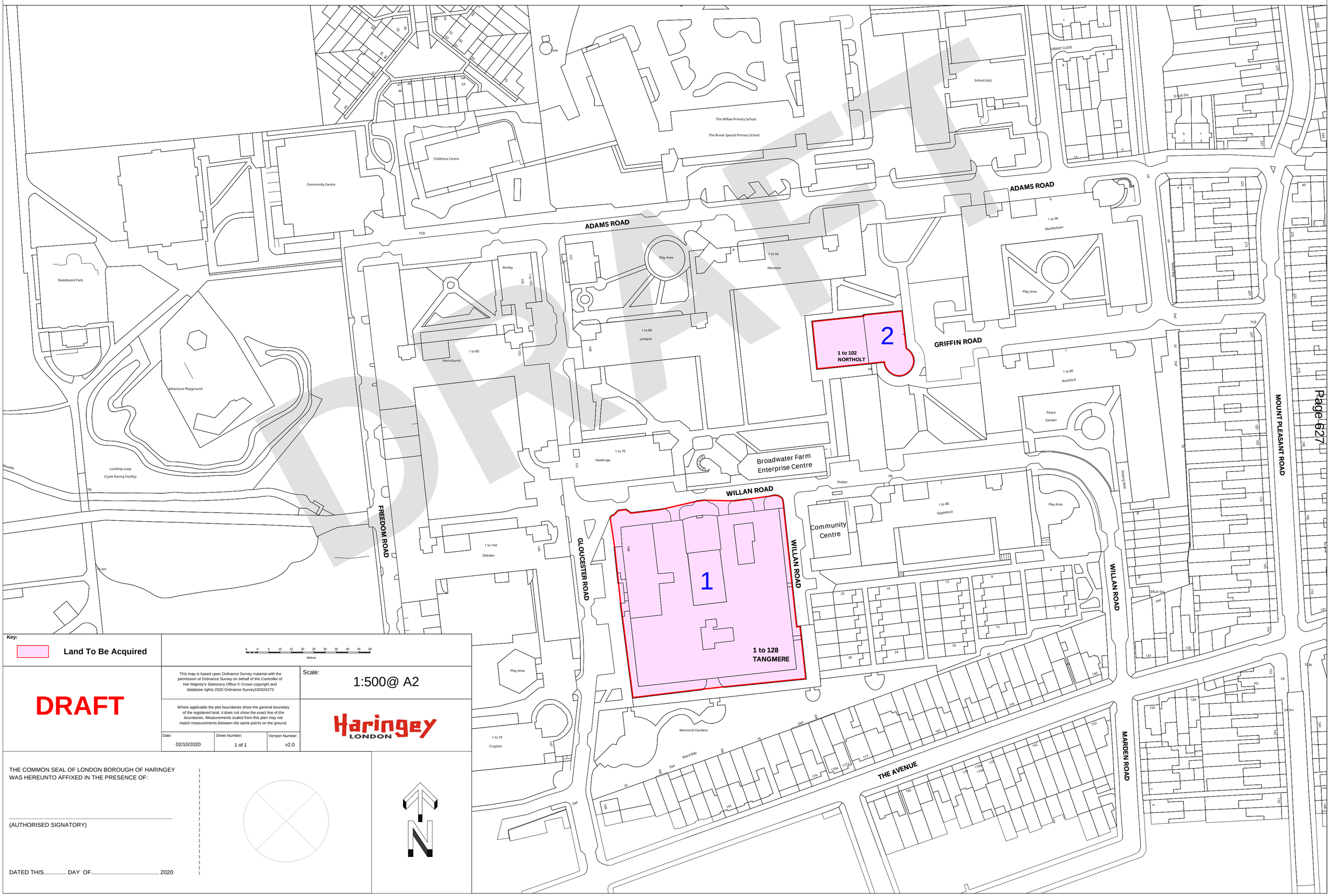
Alexandra House

10 Station Road

London N22 7TR

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MAP REFERRED TO IN THE LONDON BOROUGH OF HARINGEY (NORTHOLT AND TANGMERE) COMPULSORY PURCHASE ORDER 2020



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Key:

Land To Be Acquired

5 0 5 10 15 20 25 30 35 40 45 50
Metres

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Scale: 1:500@ A2

Where applicable the plot boundaries show the general boundary of the registered land, it does not show the exact line of the boundaries. Measurements scaled from this plan may not match measurements between the same points on the ground.

Date:	Sheet Number:	Version Number:
02/10/2020	1 of 1	v2.0

Haringey LONDON

THE COMMON SEAL OF LONDON BOROUGH OF HARINGEY
WAS HEREUNTO AFFIXED IN THE PRESENCE OF:

.....
(AUTHORISED SIGNATORY)

DATED THIS..... DAY OF..... 2020

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EQUALITY IMPACT ASSESSMENT

The **Equality Act 2010** places a '**General Duty'** on all public bodies to have '**due regard'** to the need to:

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act;
- Advancing equality of opportunity between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

Stage 1 – Screening

Please complete the equalities screening form. If screening identifies that your proposal is likely to impact on protect characteristics, please proceed to stage 2 and complete a full Equality Impact Assessment (EqIA).

Stage 2 – Full Equality Impact Assessment

An EqIA provides evidence for meeting the Council's commitment to equality and the responsibilities under the Public Sector Equality Duty.

When an EqIA has been undertaken, it should be submitted as an attachment/appendix to the final decision-making report. This is so the decision maker (e.g. Cabinet, Committee, senior leader) can use the EqIA to help inform their final decision. The EqIA once submitted will become a public document, published alongside the minutes and record of the decision.

Please read the Council's Equality Impact Assessment Guidance before beginning the EqIA process.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Tangmere and Northolt CPO
Service area	Housing, Regeneration and Planning
Officer completing assessment	Aaron Scorse
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	13th October 2020
Director/Assistant Director	David Joyce, Director of Housing, Regeneration and Planning

2. Summary of the proposal

Background

In June 2018, Haringey Cabinet agreed that its preferred option was to demolish and then rebuild the Tangmere and Northolt blocks on the Broadwater Farm Estate. The reasons for this were set out in the June Cabinet report and included the significant cost of the strengthening works, which do not represent value for money. It was also noted that the properties would still not be an acceptable standard (despite the significant cost) and that the disruption (residents needing to be rehoused for 12 months) to residents would not be justified by the final outcome. The decision was taken to undertake a Section 105 consultation on this preferred option, as well as the lettings and rehousing policy to be in place for decanting.

An EqIA was considered by Cabinet as part of making its decisions in June 2018 and is published here:
https://www.minutes.haringey.gov.uk/documents/s102078/180626%20BWF%20EQIA%20final.pdf

The June EqIA considered the equality impact of rehousing residents from Tangmere under the Tangmere Rehousing Priority Scheme, and the potential impacts of the proposed Rehousing and Payments Policy and proposed Local Lettings Plan which were to be put to consultation.

On 13th November 2018, Cabinet considered responses to the consultations on the Broadwater Farm estate and resolved to proceed with the demolition of Tangmere and Northolt blocks due to the serious structural failings. The consultations were on:

- S105 to proceed with demolition of Tangmere and Northolt and build new Council homes on the land
- The Broadwater Farm Rehousing and Payments Policy
- A Local Lettings Policy

This followed the consideration of the two main options: to carry out strengthening works or demolish the blocks and then rebuild the homes.

An updated EqIA was considered by Cabinet as part of its decisions in November 2018 and is published here:
https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?AIId=58796

The November EqIA considered the decision to demolish, the final proposed Rehousing and Payments Policy, the rehousing of Northolt residents, and the final proposed Local Lettings Plan.

Impact

Since these decisions were taken, all secure tenants and the majority of leaseholders in Tangmere have been rehoused, with 6 remaining. In Northolt, 5 secure tenants and 13 leaseholders remain – with the majority having successfully been rehoused. Remaining

leaseholders and secure tenants continue to be rehoused under the policies authorised by the June and November 2018 reports. Further to this, additional provisions were made by the acquisition strategy that was passed by Cabinet in July 2020. This is explained in more detail in later sections which expand on the mitigations made to ensure those with protected characteristics were not unfairly impacted by these decisions.

When rehousing residents, the Council has undertaken in-depth discussions with all affected parties to understand their housing need and rehousing preferences. Additional priority was given to those with local connections to allow them to remain in the area if they wished (as set out in the Tangmere Rehousing Priority Scheme, considered by Cabinet in June 2018).

Support has been available to tenants and leaseholders to help them through the viewing and moving process including a number of financial provisions to cover the costs of moving, such as:

- Disturbance payments
- Home loss payments
- Basic loss payments
- Under-occupation payments
- Legal and other additional costs (for resident leaseholders)

Both leaseholders and tenants are also guaranteed a right to return as part of the Broadwater Farm Rehousing and Payments Policy, meaning they will benefit from the new homes on the estate once they are built. To enable resident leaseholders to purchase a similar property in the local area if they wished, the Council has also offered equity loans of up to 40%. Since July 2020, this policy has been updated to allow for consideration of out of borough equity loans – giving resident leaseholders more options.

The impact of rehousing, as a result of the demolition required due to safety concerns, is recognised to potentially cause stress, disruption to existing communities and social networks, and disruption to access to public services and employment within the vicinity of the estate. As a result, the Council has a duty to mitigate any disproportionate impact on people with protected characteristics. It is important to note that, even if the decision to demolish was not taken, residents would need rehousing to allow for the strengthening and refurbishment works. Therefore, it is stressed that rehousing residents would have been necessary regardless and that all policies have been considered to ensure that those with protected characteristics are not disproportionately impacted by this difficult but necessary decision.

Previous EQIAs – considering the decision to demolish, the Broadwater Farm Rehousing and Payments Policy, the Local Lettings Plan, and the Tangmere and Northolt rehousing – have noted the mitigations put in place to ensure all residents and leaseholders are supported through this period. These policies remain in place and negotiations will continue under these conditions.

This report considers the decision to begin the Compulsory Purchase Order (CPO) process to acquire the outstanding interests using compulsory purchase powers if

necessary. The act of making a CPO does not change the end result of previous decisions (all residents have known for some time that they will need to be rehoused, and the majority have already successfully been rehoused) but will provide a fixed timeline to the rehousing of residents. Therefore, the mitigations discussed in the previous EQIAs are still the most relevant policies in place. One addition to be considered is the updated Acquisition Strategy that was adopted by Cabinet in July 2020. These updates demonstrate further mitigations and flexibility by the Council to enable all resident leaseholders to be rehoused according to the 3 main principles of the Estate Renewal Rehousing and Payments Policy:

1. No resident leaseholder or freeholder will be financially worse off as a result of estate renewal
2. All resident leaseholders and freeholders will have a guaranteed Right to Return on equivalent terms
3. All resident leaseholders and freeholders who wish to move away will be supported to do so

All tenants and leaseholders that have been rehoused so far have been rehoused according to the principles and policies mentioned above. These policies still apply for remaining leaseholders and tenants and the impact of these policies on those with protected characteristics have been explored in the previous reports, noted above.

This EQIA considers the impact of making a CPO for Tangmere and Northolt on the remaining leaseholders and tenants. Due to the small number of remaining leaseholders, it is difficult to specifically address the individuals with protected characteristics that may be impacted without potentially identifying them. This EQIA therefore demonstrates the mitigations in place for those with protected characteristics without risking identification of individuals.

As all residents – both tenants and leaseholders – were engaged on the decision to demolish and the overwhelming majority supported this decision, the Council have been clear throughout that this means that all residents will need to vacate the blocks. The making of a CPO at this stage is a continuation of the decision to demolish taken in November 2018, and as such many of the relevant equalities considerations were undertaken during that time. This EQIA builds on the earlier EQIAs with reference to previous policies that mitigate any discrimination, as well as the Acquisition Strategy from July 2020 which expands upon the policies already in place. Further, it considers the specific knowledge of the remaining 19 leaseholders and 5 secure tenants in the two blocks and any changes to individual circumstances.

Stapleford Wing

The wing of Stapleford block is directly next to Northolt. To access one section of this wing (containing 12 properties, with 1 leaseholder) there is a lift that is presently located in the Northolt block. Therefore, this access route will be re-provided as part of the demolition. Housing officers have already undertaken an assessment of all residents in the wing to identify any vulnerable residents or residents with protected characteristics. It is recognised that the demolition will be disruptive to these residents, but access will be re-provided to ensure that these residents still maintain step free access to their properties.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?		
Protected group	**Service users**	**Staff**
Sex	Homes for Haringey housing data	N/A
Gender Reassignment	This data is not collected for residents	N/A
Age	Homes for Haringey housing data	N/A
Disability	Homes for Haringey housing data (when provided by the resident)	N/A
Race & Ethnicity	Homes for Haringey housing data (when provided by the resident)	N/A
Sexual Orientation	Homes for Haringey housing data (when provided by the resident)	N/A
Religion or Belief (or No Belief)	Homes for Haringey housing data (when provided by the resident)	N/A
Pregnancy & Maternity	Homes for Haringey housing data (when provided by the resident)	N/A
Marriage and Civil Partnership	This data is not collected for residents	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Sex

Of the remaining 19 leaseholders 50% are male and 50% are female. This is broadly in line with the borough average which is 49% female and 51% male.

Amongst the remaining 5 tenants there are 3 females and 2 males.

Gender reassignment

The council does not have local data regarding this protected characteristic, however, individual needs assessments to date have not identified any of the remaining residents as belonging to this protected group. There is no reason to believe that there will be specific impacts for this protected group and the Council will ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group**.**

Age

It was noted in the November 2018 EQIA that older residents were overrepresented in Tangmere and Northolt blocks. This is still the case amongst remaining leaseholders, with 57% being over 50 and none being younger than 40.

It is noted that of the 5 remaining tenants 3 are older than 65.

It is noted that several of the residents who access Stapleford via Northolt are elderly.

Disability

There are a number of remaining leaseholders and tenants who have disabilities. Some residents do not disclose if they have a disability. However, where adapted properties are needed this information will have been provided to the rehousing team for the purpose of undertaking negotiations and finding suitable new properties. Many of the remaining secure tenants in Northolt have additional needs whilst those with disabilities are over-represented amongst remaining leaseholders.

It is noted that several of the residents who access Stapleford via Northolt have disabilities.

Race and ethnicity

As noted in the November 2018 EQIA, the blocks have an overrepresentation (compared to the borough average) of Black and minority ethnic residents. This remains the case with the remaining leaseholders and secure tenants.

Sexual Orientation

Sexuality is frequently under-reported, with only half of original residents in these blocks declaring this information. It is difficult to re-analyse this data without identifying individual residents. On the limited data that was available for original residents, there were similar proportions of Gay, Lesbian and Bisexual people as the general population.

Religion and belief (or no belief)

As noted in the November 2018 EQIA, 46% of residents did not declare their religion. However, the limited data available showed an overrepresentation of Christians and Muslims in the two blocks compared to the borough population. Other religions, such as Judaism, Buddhism, and Hinduism were underrepresented in the blocks.

Pregnancy and maternity
The council does not hold data on pregnancy and maternity among its tenants and leaseholders and so this is unknown for Northolt and Tangmere residents. However, if and when this is identified through housing assessments and interviews with officers, the Council will ensure that it considers the inequalities and discrimination experienced by those who are pregnant or new mothers.

Marriage and Civil Partnership
The council does not hold data on marriage and civil partnership among its residents. There is no reason to believe that there will be specific impacts for this protected group and the Council will ensure that discrimination, harassment and victimisation is tackled based upon this and any other protected group.

4. a) How will consultation and/or engagement inform your assessment of the impact of the proposal on protected groups of residents, service users and/or staff?

During the spring of 2018, Homes for Haringey undertook considerable engagement with residents over the safety and inspection of these blocks.

Following the Cabinet decision in June 2018 to approve the rehousing of Tangmere residents, there was further engagement to enable them to be rehoused as quickly and efficiently as possible, taking into account the circumstances of each household.

In addition to this informal engagement, the Council also carried out four consultations between 11 September and 10th October 2018;

- Section 105 consultation on the future of Tangmere
- Section 105 consultation on the future of Northolt
- Consultation on the draft Broadwater Farm Rehousing and Payments Policy
- Consultation on the draft Broadwater Farm Local Lettings Policy

As part of these consultations, a letter/information pack was sent to all residents in Tangmere and Northolt and was made available in Turkish and in other languages, large print and Braille on request.

During the consultations, a number of events were arranged for residents to find out more about the decision options and policies. Translators were available at all sessions and others were arranged where necessary.

The Council also undertook door-knocking exercises in both blocks and discussed the consultations with Tangmere tenants. Further work with was also undertaken by the Independent Tenant Leaseholder Advisor who also held drop-in sessions and undertook their own door-knocking.

A total of 108 responses were received from 105 of the 206 properties (51%). However, response rates varied between Tangmere (42 out of 104 properties or 40%) and Northolt (63 out of 102 properties or 62%).

In addition to these formal consultations, residents have been kept up to date through regular newsletters, ad-hoc drop-in sessions, housing officers 1-1 support, written communications, the Homes for Haringey and Council websites, and the Broadwater Farm team have been accessible and responsive throughout.

The updated acquisition strategy has also been communicated to remaining leaseholders – with several taking their cases to the discretion panel for consideration.

The possibility of making a CPO was referenced directly in the November 2018 Cabinet report. The making of a CPO does not immediately change tenants or leaseholders circumstances, as all remaining leaseholders are already in negotiation for acquisition by agreement and these negotiations will continue as normal and remaining tenants are being supported in finding suitable properties. However, the making of a CPO, if approved, gives certainty to the acquisition strategy and rehousing by providing a clear date by which all acquisitions will be completed. In turn this will ensure programmes reliant on it, such as demolition and the building of new homes, can progress.

As all residents – both tenants and leaseholders – were engaged on the decision to demolish and the overwhelming majority supported this decision, the Council have been clear throughout that this means that all residents will need to vacate the blocks. The making of a CPO at this stage is a continuation of the decision to demolish taken in November 2018, and as such many of the relevant equalities considerations were undertaken during that time. This EQIA builds on the earlier EQIAs with reference to previous policies that mitigate any discrimination, as well as the Acquisition Strategy from July 2020 which expands upon the policies already in place. Further, it considers the specific knowledge of the remaining 19 leaseholders and 5 secure tenants in the two blocks and any changes to individual circumstances.

4. b) Outline the key findings of your consultation / engagement activities once completed, particularly in terms of how this relates to groups that share the protected characteristics

A full description of the consultation outcomes is provided in the consultation report from November 2018 Cabinet, which is available here: https://www.minutes.haringey.gov.uk/ieDecisionDetails.aspx?AIId=58796. In general, the proposals set out in the four consultations were strongly supported, with few respondents disagreeing with the proposals. A similar rate of tenants with protected characteristics supported the proposals, with no significant variation among tenants who share any particular protected characteristic. Due to the high rate of support there is limited value in analysing responses by protected characteristics and there is a danger with several that such analysis may reveal the responses of individuals.

In terms of response rates for protected groups, these were largely in line with the known demographics of the blocks, though it is noted that there was a slightly lower proportion of respondents between 45 and 65 (38%) compared with the population of the two blocks (47%) and higher among those 65 and over (29% compared with 27%).

Further direct engagement with remaining leaseholders resulted in the updated Acquisition Strategy passed by Cabinet in July 2020. This Acquisition Strategy responded to the concerns raised by remaining leaseholders by including the option for out of borough equity loans and the option for social tenancies to replace a leaseholder's interest. This strategy is a reflection of the Council's desire to acquire remaining leasehold interests by agreement and avoid the formal use of CPO powers if possible.

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. Sex

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	

There are equal numbers of men and women amongst the remaining leaseholders in the two blocks.

3 of the remaining secure tenants are female, and 2 are male.

The Council recognises that the rehousing of single mothers can be a particularly negative experience for those individuals and their families due to support networks that often exist in the local area, along with access to local facilities and proximity to places of work. As noted in the EQIA for demolition in November 2018, 92% of lone-parent households in West Green were headed by women.

To offset these potential negative impacts a number of important mitigations have been made:

- Financial assistance set out in the Broadwater Farm Rehousing and Payments Policy (explored in the November 2018 EQIA)
- Equity loans – enabling leaseholders to purchase similar properties in the local area
- Social tenancies as set out in the Acquisition Strategy from July 2020
- Practical support in finding a new property

- Flexibility and a discretion panel to consider requests outside of the current policies, to find suitable solutions for those particularly ill affected by rehousing

Further to this, those with a member of the household attending a local school, or with support services only available in the local area, are priority 2 under the Broadwater Farm Rehousing and Payments Policy.

This support has and will continue to mitigate any disproportionate impact on people with this protected characteristic.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

2. Gender reassignment

Positive	Y	Negative		Neutral impact		Unknown Impact	Y

The Council does not hold local data regarding this protected characteristic and it is not believed that anyone with this protected characteristic is amongst the group of remaining leaseholders in either block. There is no reason to believe that there would be any specific impact on this group as a result of the CPO. The mitigations in place to help people remain in the local area – enabling continued access to the same healthcare and support networks – apply equally to this protected group and therefore mitigate any potential negative impacts.

To the extent that people with this protected characteristic are represented among leaseholders, the CPO will have a long-term positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

3. Age

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	

Older residents are overrepresented amongst the remaining residents when compared to the borough averages. Therefore, the CPO will have a short-term negative impact on this group due to the disruption associated with re-housing.

The mitigations in place, through the Broadwater Farm Rehousing and Payments Policy from November 2018 and the Acquisition Strategy adopted in July 2020, will positively impact this group by helping them find and afford a new property in the local area if they wish to and by introducing other options such as the social tenancy and discretion panel. These options are intended to give remaining leaseholders the best chance of finding new properties that suit their needs. This means taking into consideration elderly leaseholders' health and care needs as well as practical and financial support to make moving easier. Therefore, on balance this group will not be disproportionately impacted by the making of the CPO.

Remaining secure tenants are being supported by the Broadwater Farm Rehousing and Payments policy. This policy positively impacts people by guaranteeing them a right to return to the estate – either to existing properties as they become available or to the new homes once they are built. They are also supported through the moving process, with housing officers undertaking individual needs assessments and directly supporting them. This includes with payments for under-occupation and priority rehousing for those who are vulnerable under the Broadwater Farm Rehousing and Payments Policy.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

There are several elderly residents residing in the section of Stapleford wing that requires lift access via Northolt. Elderly residents are more likely to require the use of lifts to access their properties. This lift access to Stapleford wing will be re-provided as part of the demolition. Due to this mitigation, residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

4. Disability

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	

Specific data on disabilities is unknown for remaining leaseholders, with this data generally being under-reported by residents. Similarly, the data is underreported amongst tenants. However, where residents have a disability this has been identified by rehousing officers in 1-1 assessments, who support residents in finding a suitable property. Further to this, those tenants who are vulnerable (including disability) are priority 1 for rehousing under the Broadwater Farm Rehousing and Payments Policy.

The making of a CPO will not have specific impacts on disabled residents. However, the continued need to be rehoused does. This was considered in the EQIA that accompanied the November 2018 Cabinet decision to demolish. It is recognised by the Council that moving can be particularly difficult for those with physical and mental disabilities, particularly if a property with specific adaptations is needed. The Rehousing and Payments Policy and the Acquisition Strategy are intended to enable flexibility so all residents can find a new and suitable property of similar size and quality. Dedicated

rehousing officers have also been and will continue to give practical support that will enable residents with disabilities to find a suitable property.

The local lettings policy, which guarantees leaseholders a right to return once the new homes are built and ensuring that these properties are suitable, will also benefit leaseholders with disabilities – ensuring that they can get a new and suitable property on the estate once they are built if they wish.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

There are several disabled residents residing in the section of Stapleford wing that requires lift access via Northolt. Disabled residents are more likely to require the use of lifts to access their properties. This lift access to Stapleford wing will be re-provided as part of the demolition. Due to this mitigation, residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

5. Race and ethnicity

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	

The data in section 3 notes that Black and other BAME groups are overrepresented in the Tangmere and Northolt blocks compared to the borough average. This is also the case amongst remaining leaseholders and secure tenants.

It is recognised that there may be specific cultural ties, such as businesses that cater for the cultural needs of specific groups, in the local area that the remaining leaseholders may want to remain close to. The support being offered to all households is intended to enable leaseholders to find a new and similar property in the local area. The provisions for equity loans, for example, will help leaseholders on low incomes – a group where BAME individuals are overrepresented. Home loss payments and equity loans are also intended to make finding a new property in the local area possible. The right to return to the estate will also have a positive impact on BAME leaseholders and secure tenants.

Any residents with language needs, which have been identified through individual assessments, are provided with translated communication materials and the option of translators at meetings if they require.

Therefore, the making of a CPO will have both positive and negative consequences for people with this protected characteristic – but the mitigations in place ensure that this impact is not disproportionate.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

6. Sexual orientation

Positive	Y	Negative		Neutral impact		Unknown Impact	Y

As noted in section 3, data on sexual orientation is frequently under-reported. Similarly, it was noted in the June and November 2018 EQIA that this data was under reported in the two blocks. The impact on this group is unknown, however, there are no reasons identified to believe that making the CPO would have a disproportionate impact on people with this protected characteristic.

The mitigations in place – around finances, practical support, and advice will also benefit individuals with this protected characteristic. There is no reason to believe that the proportions of residents with this protected characteristic are different now than at the time of considering the June or November 2018 EQIAs. Therefore, there will not be a disproportionate impact on residents with this protected characteristic.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

7. Religion or belief (or no belief)

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	

There is limited data on the religion of remaining residents, and this is unknown unless it is explicitly declared. It is recognised that moving away may have a specific negative affect on those who attend religious institutions in their local area. However, residents with these protected characteristics are positively impacted by the mitigations that have been put in place to enable leaseholders to purchase a property in the local area. Additional to this, there is the provision to allow for leaseholders and secure tenants to return to the estate once the new properties are built or if a property becomes available in the meantime.

The Council believes that there will not be a disproportionate impact on this group due to the making of the CPO and that the mitigations in place are robust enough to ensure that there is adequate support for people with this protected characteristic.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

8. Pregnancy and maternity

Positive	Y	Negative	Y	Neutral impact		Unknown Impact	

The data on remaining leaseholders suggests that 50% are women. Similarly, 3 of the remaining tenants are women. The Council holds no local data on pregnancy and maternity for residents. However, if an individual presents themselves as pregnant to the rehousing team support and advice would be provided. It is recognised that moving to a new house whilst pregnant would be particularly stressful and the Council is mindful of the negative impact this may have. To remove as much stress as possible generous financial and practical support is available to all residents required to move due to the demolition. This is intended to enable people to remain in the local area if they wish, which will benefit pregnant individuals who have local support and health networks. The right to return to the estate will also positively impact this group in the long term.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

9. Marriage and Civil Partnership

Positive	Y	Negative		Neutral impact	Y	Unknown Impact	

People who are in a civil partnership will be treated the same as people who are married in all respects.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Stapleford wing

Lift access to Stapleford wing will be re-provided as part of the demolition. Residents in the affected section of Stapleford wing with this protected characteristic will not be disproportionately impacted by the making of the CPO.

10. Groups that cross two or more equality strands e.g. young black women

Due to BAME and elderly groups being overrepresented amongst remaining leaseholders the making of a CPO will potentially have a negative impact on older BAME people. This group are also more likely to have other vulnerabilities, such as poor physical or mental health. These inter-connected protected characteristics require a tailored approach that recognises the specific needs of individuals and households. This is why throughout the negotiations rehousing officers have worked hard to develop relationships with residents and respond to their specific needs and concerns. The option to take requests to an independent discretion panel also ensures that where multiple protected characteristics intersect specific and appropriate measures can be taken to ensure there are no disproportionate impacts.

The other relevant policies such as the Broadwater Farm Rehousing and Payments Policy and the Acquisition Strategy will also benefit residents with multiple protected characteristics and ensure that any negative impacts are not disproportionate.

In the long-term the CPO will have a positive impact as it will move people out of unsafe properties, removing the risk of harm.

Outline the overall impact of the policy for the Public Sector Equality Duty:

The Council has a duty to have due regard for the need to eliminate discrimination, harassment, and victimisation. The approach taken to the CPO, as set out in this report, with a range of mitigations in place that will seek to provide support for leaseholders based on their individual needs will ensure that no discrimination based on any of the protected characteristics occurs.

The Council has a duty to have due regard for the need to advance equality of opportunity for individuals and groups of people who share the protected characteristics. This includes enabling participation in public life and access to public services. The greatest impact of these proposals in this sense will be on those who are dependent on local support networks and public services such as schooling, including children, parents, single parents, and older people. This is because any move away from Broadwater Farm caused by rehousing may make it more difficult for these residents to maintain these support networks and continue to access services.

Leaseholders have been in negotiation with the rehousing team since 2018 and have long been aware that they will be moving. The enacting of a CPO does not change this immediate reality for the remaining leaseholders, although it does give more certainty to the date by which they will need to be rehoused. Further to this, a number of mitigations have been built into policies – and updated and expanded as required, such as with the Acquisition Strategy adopted by Cabinet in July 2020 – to do everything to enable leaseholders to purchase a new property in the local area or to get a social tenancy if they wish. The right to return will also have a positive impact on all leaseholders and secure tenants, including those with protected characteristics.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?	
Outcome	Y/N
No major change to the proposal	Y
Adjust the proposal	
Stop and remove the proposal:	

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
Loss of local healthcare, support networks and increased distance from schools affects: • Females (with children) • Pregnancy • Disabled residents • Elderly residents • Religious residents • Gender reassignment	- Rehousing and Payments Policy, agreed in 2018, provides financial and practical support for leaseholders and secure tenants - Local Lettings Policy, agreed in 2018, guarantees a right to return to the estate for leaseholders and secure tenants - Acquisition Strategy – agreed in July 2020, expands equity loans and introduces social tenancies as an option and offers more flexibility via the discretion panel - Broadwater Farm Rehousing and Payments Policy – prioritised vulnerable tenants for rehousing and introduced measures to enable leaseholders to afford	Director of Housing, Regeneration and Planning	*These policies are ongoing and will remain in place until all interests have been acquired and all tenants and leaseholders rehoused.*

	similar properties in the local area		

Please outline any areas you have identified where negative impacts will happen as a result of the proposal but it is not possible to mitigate them. Please provide a complete and honest justification on why it is not possible to mitigate them.

Where there is a need for a household to move to a different part of the borough, Homes for Haringey staff will work with households and provide support if new arrangements to access public services such as healthcare and education need to be made. Financial assistance will also be provided to cover the costs of moving home. If any of the remaining leaseholders cannot afford a suitable property with the equity loan and generous offer, the Acquisition Strategy from July 2020 enables them to request a social tenancy.

To mitigate the longer-term impact of rehousing, the Rehousing Policy offers residents the Right to Return to the estate, if they wish to.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

Ongoing monitoring of these policies will be undertaken as households are interviewed, moved and, if they desire, return to the estate.

Rehousing officers will continue to work with leaseholders and the discretion panel will continue to consider provisions that can be made outside of the policies in place as and when necessary.

7. Authorisation

EqIA approved by ..... (Assistant Director/ Director)	Date .....

8. Publication

Please ensure the completed EqIA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

Report for: Cabinet 13th October 2020

Title: The acquisition of two head leases and grant of a new lease at the Chocolate Factory and Mallard Place, Wood Green

Report authorised by : Director of Housing, Regeneration and Planning

Lead Officer: Assistant Director Regeneration and Economic Development
Assistant Director Capital Projects and Property (Interim)

Ward(s) affected: Noel Park

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 This report sets out the proposal to acquire the two leasehold interests currently held by Workspace from the Council at the Chocolate Factory site and Mallard Place site and for the Council to extend the lease of part of the Chocolate Factory site currently held by Workspace in order to enable them to build new employment space on part of the site and their adjoining site and an adjustment of the boundary area between the Chocolate factory site and the adjoining Workspace site.

1.2 The sites proposed to be acquired are located in the area referred to as the Cultural Quarter in Wood Green. The strategic regeneration ambitions and the planning policy for the Cultural Quarter and the Town Centre are set out in the current draft of the Wood Green Area Action Plan. It is an area where significant numbers of homes and jobs can be delivered through targeted investment to create a vibrant mixed use area of employment, housing, and culture, with high quality public realm, and easy access to social and community facilities and recreation.

1.3 The opportunity to acquire the leasehold interests offers value for money to the Council and is a unique opportunity to take control of Council freehold land in the vicinity in order to affect the regeneration of the area

1.4 This will enable the Council to develop out the area acquired from Workspace and in accordance with the planning consent to provide 137 residential homes, including a significant number of Council owned homes, and 1077 sqm commercial employment space. It is also an opportunity to regain control of the strategically

significant Mallard Place site in terms of the current tenancy to Area 51 and for the future development of housing and workspace. This will also enable Workspace to bring forward a commercial workspace block on their site as part of the overall detailed planning consent.

1.5 The Chocolate Factory site has become a cultural and workspace destination providing a range of studios and workspaces that have contributed to the unique identity of the area and to the local economy which will continue. Mallard Place is the current home of Area 51, an organisation providing education and training for young adults with severe or profound learning disabilities.

2. Cabinet Member Introduction

2.1 It is as important now as it has ever been that the Council proactively seeks outs opportunities to support economic growth and regeneration. This proposal will be a major catalyst to the regeneration of this part of Wood Green. It provides an exciting opportunity to acquire the full interest in land currently leased to Workspace, which will allow the Council to build 137 new homes as part of the Council Housing Delivery Programme on the Chocolate Factory site. The site already has planning consent and we are ready to build the first phase of new houses here which should be on site by next summer and be completed by the summer of 2023. The proposal also enables the Council to develop a further 66 homes on the Mallard Place site as later phase. Workspace will be provided on both sites to support employment. This proposal is in line with our Borough Plan and meets our Disposals and Acquisitions Policy which we agreed earlier this year. It is a very positive step to support good economic recovery and our housing programme.

3. Recommendations

3.1 Cabinet are recommended to agree:

a) To acquire part the leasehold interest from Workspace of the land shown coloured green on the red line plan in Appendix A and known as the Chocolate Factory for a sum set out in Part B to this report and;
b) To acquire the whole of the leasehold interest from Workspace of the land set out in blue in the red line plan in Appendix A and known as Mallard Place for a sum set out in Part B to this report and;
c) To the extension of the remainder of the existing term up to a maximum of 250 years of the existing lease of the part of the Chocolate Factory site remaining in Workspace ownership and shown coloured red on the plan attached at Appendix A for a sum of £1.00 A; and
d) To the transfer of the freehold land shown coloured orange on the plan attached at Appendix B to Workspace for a sum of £1.00; and
e) To the acquisition of the freehold land shown coloured yellow on the plan attached at Appendix B from Workspace for a sum of £1.00; and
f) All in accordance with the Heads of Terms attached in Appendix D.
g) To give delegated authority to the Director of Housing Regeneration & Planning after consultation with the Cabinet Member for Finance and

Strategic Regeneration to agree any minor variations to the Heads of Terms and the final terms of the documents.

4. Reasons for decision

4.1 The opportunity to acquire the two leasehold interests offers value for money to the Council and is a unique opportunity to take control of part of the Chocolate Factory site and Mallard Place site in the vicinity in order to effect the regeneration of the area. The retention of part of the demise in the Chocolate Factory Lease will also enable Workspace to take forward the planning consent on their site increasing investment into the area.

4.2 By acquiring the part of the Chocolate Factory leasehold interest the Council would then benefit from controlling part of the site and allow the new housing to be delivered (and employment space) on its own land. The site would form part of the Council's five-year housing supply by the acceleration of housing delivery on the portion of land for which there is a planning consent. The development would provide a more appropriate mix and better percentage of housing on the site including Council rented homes as well as private homes through the acquisition of the leaseholds.

4.3 The acquisition would mean that the Council can move swiftly to implement delivery of council homes on Council land with a start on site within 18 months for the land on the Chocolate Factory site. Some minor elements of the design of the scheme would require amending through a S73 application as would the s106 associated with the existing permission. This accelerated delivery is fully in line with the Council's Good Economy Recovery Plan and the accelerated delivery of the units will help stimulate employment opportunities in the local economy, which will complement the employment and skills initiatives being brought forward part of the wider plan.

4.4 By acquiring the lease for Mallard Place site and with a frontage to Coburg Road there will be an opportunity to deliver housing, mixed use floorspace, and quality public realm on this site and others fronting onto Coburg Road as part of the regeneration of this area.

5. Alternative options considered

5.1 An option considered was for the Council to acquire the whole of the consented area (minus the Chocolate Factory building). This opportunity was discounted on the basis of additional risk to the Council in taking on private development, notably a large element of employment space, in the current marketplace.

5.2 Another alternative option is to sell the Council freehold or grant Workspace a long lease on the whole of the consented area. However, this was discounted on the basis that the scheme would produce a lower level of affordable residential

units and the opportunity to acquire the site and provide Council rented accommodation on Council land.

5.3 The option proposed provides the most viable option and provides an opportunity for the Council to build Council rented accommodation on a Council site with planning consent, rather than relying on a private development with a more modest affordable element. This option can also be delivered more quickly than those discounted.

5.4 A further alternative option would be for the Council not to agree to the acquisition of the two leasehold interests from Workspace. This would mean that the consented scheme for the whole of the Chocolate Factory site would not be implemented. Therefore, the site would remain in its current use, the planning consent could lapse, or the site could be sold onto another owner. The new homes and employment space together with the refurbishment of the existing Chocolate Factory would be unlikely to go ahead or would be delayed for some time. This may have implications for the Council's five year housing supply.

6. Background information

6.1 The Council owns the freehold interest in land let on two long leases to Workspace forming part of the Chocolate Factory site and Mallard Place site (see the red line plan in Appendix A). The Chocolate Factory site is currently mainly employment space accommodation owned and managed by Workspace and includes a number of small units on the land owned freehold by the Council. Mallard Place is sublet by Workspace to Area 51 on a two year lease and workspace lease it on a 99 year lease from June 1978 at a current rent of £30,500 per annum. There are 10 units on the site of which 6 are vacant and 4 being held on short leases with 3 months' notice. The total income is £18,893 per annum which would be payable to the Council until vacant possession is required. A plan showing the two areas leased is attached in Appendix A.

6.2 Workspace obtained detailed planning consent (granted in February 2019) for a mixed residential and commercial scheme on the site (not including Mallard Place). The consent for the whole development includes 230 residential units (72 affordable) and 10,657 sqm of employment space (c.1000 sqm affordable) together with a signed S106 agreement.

6.3 Since late 2019, the council has been in discussions with Workspace regarding the scope to acquire the two head leases back from Workspace and to lease back part of the site to them so that the Council can take forward the majority of the residential development itself (plus other requirements on those sites associated with the existing planning permission) in order to add to the Council housing delivery programme.

6.4 Following a number of rounds of discussions with Workspace, meetings and briefings with members and senior officers, negotiations have progressed on the acquisition of the leasehold interests and 'Heads of Terms' have now been agreed. Under the agreed terms the Council would acquire part of Workspace's leasehold interests at the Chocolate Factory site, the lease for the remainder will be

extended so the term is 292 years instead of 99 years from 1978 reflecting the proposals in the planning consent, there will be an adjustment of the boundary between the Council's freehold interest and the Workspace freehold interest in the adjoining land to allow each party to implement the existing planning consent and finally the Council acquiring the whole of the lease from Workspace of the Mallard Place site.

6.5 The Council also owns the freehold interest in Mallard Place site and it is also subject to a lease to Workspace for a term expiring on 24th June 2075. The Council receives 25% of the rental income and it is currently let by Workspace to Area 51 and that lease is for two years contracted outside Section 24 to 28 of the Landlord and Tenant Act 1954 (part 2) with a mutual six months to expire on, or any time after, 17 September 2021. The passing rent is currently £130,000 pa.

Regeneration

6.6 The character of this part of Wood Green is based on the rich and diverse mix of businesses and enterprises that have located in many of the employment spaces. The ambitions for the regeneration of Wood Green is maintain its status as a Metropolitan Centre and an Opportunity Area under the London Plan. To ensure this, there is a target of 4,000 new jobs and 6,400 new homes across the Wood Green Town Centre in the draft Wood Green Area Action Plan. These sites will contribute towards these housing and employment targets.

6.7 Both sites are identified for regeneration for workspace and housing in separate site allocations within the draft Wood Green AAP. The Chocolate Factory planning consent is fully in line with the current site allocations in the AAP. Mallard Place is located in a large AAP site allocation that runs along the northern side of Coburg Road and includes another Council site at Kingfisher Place. The general area is designated for a mix of employment and housing. By acquiring the two leases the Council would have control of both sites.

6.8 This is a unique opportunity to secure the key strategic site of Mallard Place. This site, with a frontage to Coburg Road, will unlock the opportunities for regeneration along this street (which includes the Council's Kingfisher Place) to deliver housing, mixed use floorspace, and quality public realm. The development of the Chocolate Factory site, and subsequently the Mallard Place site, can also serve as a catalyst to engage with other landowners to bring forward investment on nearby sites.

6.9 The development scheme proposed for the Chocolate Factory site also contains 1077 sqm of workspace. This will enable the Council to take a proactive approach to providing employment space to locate and/or grow businesses and social enterprises in the Cultural Quarter and would positively contribute to the economic vitality of Wood Green. There are number of options for the management of this employment space, including direct management as part of its commercial property portfolio, or sub-let to an employment space provider through the council's workspace operators list. A full range of options for managing the employment space are to be explored.

6.10 The acquisition, investment, and delivery of homes and employment space at this point can play an important part of the post Covid 19 economic recovery of

Wood Green. The council has published a 'Good Economy Recovery Plan', which seeks to support initiatives that can stimulate the economy, and as importantly ensure that local residents get access to the employment opportunities generated.

6.11 The summary of the strategic position is that the acquisition and development of the Chocolate Factory and Mallard Place site:

- is in line with the Council's regeneration strategy for Wood Green and the Cultural Quarter;
- helps to generate an employment stimulus as part of the council's Good Economy Recovery Plan;
- is, by virtue of the recent consent, consistent with the current draft of the Area Action Plan; and
- will contribute to meeting the current Local Plan targets for housing and employment and contribute to the council's 5-year housing supply targets.

Housing/Workspace development, funding and timetable

6.12 The acquisition of part of the Chocolate Factory site would mean that the Council subject to including this site in the Housing delivery programme can move swiftly to implement the delivery of council homes on council land with a start on site within 12 to 18 months for sites D/E (as shown in Appendix C) and should take around two years to complete. Some minor elements of the approved design of the scheme would require amending through a S73 application as would the s106 associated with the existing permission expected by February 2021.

6.13 Direct delivery by the Council is, the preferred model and has been the basis of the viability and funding strategy for the Chocolate Factory site. Joint partnering arrangements are not considered the best approach for the delivery of the site given the council's positive appraisal developed for a direct delivery approach. Other delivery options such as the introduction of development partners would involve procurement, agreements etc, which could impact adversely on timescales for delivery. Options for the delivery will be reported to Cabinet in order to take forward the procurement once the Chocolate Factory site has been acquired.

6.14 The Housing Delivery Team have undertaken a financial appraisal on the consented scheme (sites D and E2/3) and in relation to the lease acquisition. This shows a positive net present value subject to appropriating the land to the HRA (timing to be confirmed). It has been confirmed that based on the agreed maximum acquisition cost, it is clear that the appraisal has enough prudence for both sites to work in the HRA and shows a strong financial case for the acquisition.

6.15 The Mallard Place site is currently being reviewed in terms of a scheme with the potential to provide a further 66 homes on the site. Carter Jonas have reviewed the site on this basis and the purchase price figure agreed with Workspace comfortably reflects a viable development with a discount to reflect that is does not yet have a planning consent. The Housing delivery team have undertaken a financial appraisal on the proposals, and this shows a positive net present value subject to appropriating the site to the HRA.

6.16 Negotiations have begun with the GLA and if the scheme for the Chocolate Factory site is delivered by the Council with a minimum 50% affordable housing then it should attract grant support and could be included in the BCHfL Programme. Housing have undertaken an appraisal which shows a mix of 109 affordable units and 28 private units being achieved on the Chocolate Factory site. These levels of affordable housing would not be realised if developed by the private sector and supports the case for direct delivery by the council. The current consented scheme only provides 31% affordable across the whole scheme. The acquisition of both sites provides the opportunity to provide Council rented accommodation at a financially attractive level.

6.17 The Housing Team has drawn up a timetable for the preparation of the construction on blocks D, E 2/3 as shown on the plan in Appendix C and construction of the buildings on the land. Based on the current detailed planning consent, the land being surrendered back to the Council will provide 137 residential units and 1077 sqm of workspace. The redevelopment of Mallard Place would be delivered on a later time scale. The timetable is set out below:

6.18 Indicative programme for Council buildings D&E2/3 for the Chocolate Factory site:

Activity	**Date**
Cabinet Decision	Oct 2020
Start Negotiations with Workspace on Planning / s106 split and s73 submission - Appoint Architects	Oct 2020
Review Planning Approval	Nov 2020
Submit s73 to Planning	Dec 2020
Planning Approval	Feb 2021
Exchange subject to contract / DAR	Mar 2021
Tender Construction Contract	Mar 2021
Cabinet Approval (construction contract)	July 2021
Start on site	Aug 2021
Completion	Aug 2023

6.19 In acquiring the two leases from Workspace, the Council would then be entitled to receive the whole rent from each site. This is currently £18,893 per annum from the Chocolate Factory site and £130,000 per annum for the Mallard Place site.

Heads of Terms

6.20 Carter Jonas have undertaken development appraisals on the planning consent for the whole Chocolate Factory site and Mallard Place site, and these have been subsequently discussed with Workspace. Subsequent negotiations have taken place based on the Council acquiring the two leasehold interests held on the Chocolate Factory site and Mallard Place site. In order to split the construction of block E in the consented scheme on the Chocolate Factory site a slight change in

the boundary between ownerships is required in order to reflect the current planning consent relating to block E. A plan showing the various blocks is set out on Plan 4. A figure of set out in Part B to this report has been agreed for the acquisition of part of the leasehold interest in the Chocolate Factory site and reflects the development value of this site as part of the consented scheme. The heads of terms also include part of the Chocolate Factory site (block F on plan) to be retained by Workspace but that that lease term be extended to 250 years at a pound and on the basis of the planning consent for the block once the S73 Planning application has been approved. This forms part of the deal agreed with Workspace in order to ensure the maximum amount of new workspace is achieved from the planning consent and to support the costs of refurbishment of the existing Chocolate Factory building. The development value of the proposed lease extension is estimated at a figure set out in Part B to this report although the Council are leasing the land to Workspace at a peppercorn.

6.21 Mallard Place (which is not part of the current planning consent) is currently let to Area 51 on a 2 year lease (outside the provision of the Landlord and Tenant Acts). Carter Jonas have estimated a development land value based on consent for a scheme of 66 residential space and 437sqm of commercial space. Adding this site brings residential numbers up to 203 and commercial/workspace to 1514 sqm. A figure as set out in Part B to this report has been agreed to acquire the lease from Workspace. On the basis that the consent was forthcoming the site would then have a value as set out in Part B to this report.

6.22 Carter Jonas have negotiated the heads of terms with Workspace based on the deal as a whole covering the acquisition of the two leasehold interests from Workspace and the lease extension of part of the chocolate factory site and the land swap (boundary adjustments). This is reflected in a price as set out in Part B to this report for the two leasehold interests being acquired by the Council and the extension of the lease of part of the Chocolate Factory site back to Workspace at a peppercorn (with an opportunity value/cost to the Council as set out in Part B to this report) plus the readjustment of the freehold boundary for the construction of Block E. Carter Jonas have prepared a valuation report confirming that the overall deal represents best value to the Council. A summary of the report is attached in Appendix E. This reflects the payment as set out in Part B to this report by the Council to acquire the two leasehold interests plus the opportunity cost of the lease extension to Workspace as set out in Part B to this report plus the readjustment of the freehold boundary in order to construct Block E.

Risks

6.23 A number of risks and mitigations have been considered.

Delivery

6.24 Obtaining planning approval – s73 amendment required which will involve amending the approved planning drawings to split out the two areas of the Chocolate Factory site which will be delivered by the Council and by Workspace. Planning indicated that this is acceptable and can be dealt with as a s73 amendment. The risk of not obtaining approval to be mitigated by engagement with planning department through formal pre-application process to ensure all planning

matters are identified and resolved prior to submission. The section106 agreement is to be agreed between the parties and planning in terms of responsibilities and will follow the same route (i.e. pre app) to planning approval to mitigate risks.

6.25 Demolition and site preparation – A joint Construction Management Plan (CMP) is to be prepared that will cover both sites for approval by both parties that will cover the sequencing of demolitions and site preparations. This will ensure the staged and timely approach to the demolition of the Chocolate Factory buildings that are on the Council's freehold so that housing delivery can proceed without delay.

6.26 The heads of terms set out agreed timescales for both parties to demolish existing buildings and take development forward. These will be subject to the agreed Construction Management Plan.

Commercial Space

6.27 Loss of Tenant – should the current occupant vacate Mallard Place, there is a potential risk to income from this site. Current rental figures indicate this unit could be re-let and a potentially higher rent as set out in Part B to this report than present based on a change from educational to commercial use could be achieved thus mitigating possible income losses.

6.28 Uptake of commercial space - the scheme will deliver 1077 sqm of workspace. The uptake of this space by tenants maybe a risk in the future. Despite the current Covid 19 context, evidence has suggested that demand for workspace is still firm. To mitigate risks, market testing (which will include using the council's Workspace provider list) will be undertaken to help inform the best option for ensuring commercial space meets market or sectoral demand, as well as the identify the most appropriate management model for this space.

6.29 A risk analysis is set out below in relation to the proposal:

Option	Risk	Actions
Planning consent	This was granted in 2019 for three years	Housing to gear up on the scheme to take it forward.
A split in delivery of the Chocolate Factory site - Planning issues	Planning conditions including S106 requirements will need to be agreed for the Chocolate Factory site.	These will be ironed out and agreed prior to completion
Mallard Place	This currently does not have planning consent and also would require vacant possession	This could be a phase two to the scheme and is let to Area 51 on a two year lease. Planning to be worked up during this period.

Property market	The property market is currently flat and there is uncertainty in how it will return. here will be risks in terms of valuation and future demand which will heavily depend on how the economy returns	There is an opportunity to acquire this site now in order to instigate the planning consent and provide additional Council rented accommodation. Not acquiring part or all of the site may result in the site not being developed for some time.

7. Contribution to strategic outcomes

7.1 The proposal will support the key elements for People and Place priorities in the Borough Plan –

> **People** - our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential
>
> **Place** - a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

8.1 Finance comments are set out in Part B to this report.

8.2 Finance comments are set out in Part B to this report.

8.3 Finance comments are set out in Part B to this report.

8.4 Finance comments are set out in Part B to this report.

8.5 Finance comments are set out in Part B to this report.

8.6 Finance comments are set out in Part B to this report.

Procurement

8.7 As this is classed as a Land Transaction it does not have any procurement implications.

Legal [Name and title of Officer completing these comments]

8.8 The Council is proposing to acquire two leasehold interests currently held by Workspace and the acquisition of a small piece of land as part of a boundary adjustment along the Chocolate Factory site boundary. The Chocolate Factory site will be developed and the Mallard Place will be held until such time as it is developed. The Council currently holds the freehold of these sites under the General Fund, the leasehold interests will be merged with their respective freeholds on acquisition.

8.9 The Council has the power to acquire under Section 120 of the Local Government Act 1972 for (a) the purposes of any of its functions under this Act or any other enactment, or (b) the benefit, improvement or development of their area. The Council may also acquire by agreement any land for any purpose for which it is authorised, notwithstanding that the land is not immediately required for that purpose; and, until it is required for the purpose, any land acquired may be used for the purpose of any of the Council's functions.

8.10 The recommendation also proposes a lease extension of the existing lease currently held by Workspace of the Chocolate Factory for an initial period of 99 years for a period of 250 years and also the disposal of a small piece of land along the Chocolate factory side boundary. These will be disposals under section 123 of the Local Government Act 1972. The Council must obtain best consideration.

Equality

8.11 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

8.12 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 apply to the first part of the duty.

8.13 The proposed decisions are to agree to the surrender of two leases from Workspace held in Noel Park ward and to lease part of the Chocolate Factory site back to Workspace in order to enable construction of residential and

commercial properties. Delivery can be expected to provide more homes and jobs to local residents. In this context, it is notable that residents of the Wood Green area, including Noel Park, Woodside, and Bounds Green wards, are younger on average and more likely to be from BAME communities than the populations of Haringey or London. People with these protected characteristics can therefore be expected to benefit from the proposed decision, and as such it represents a measure to advance equality of opportunity for these groups.

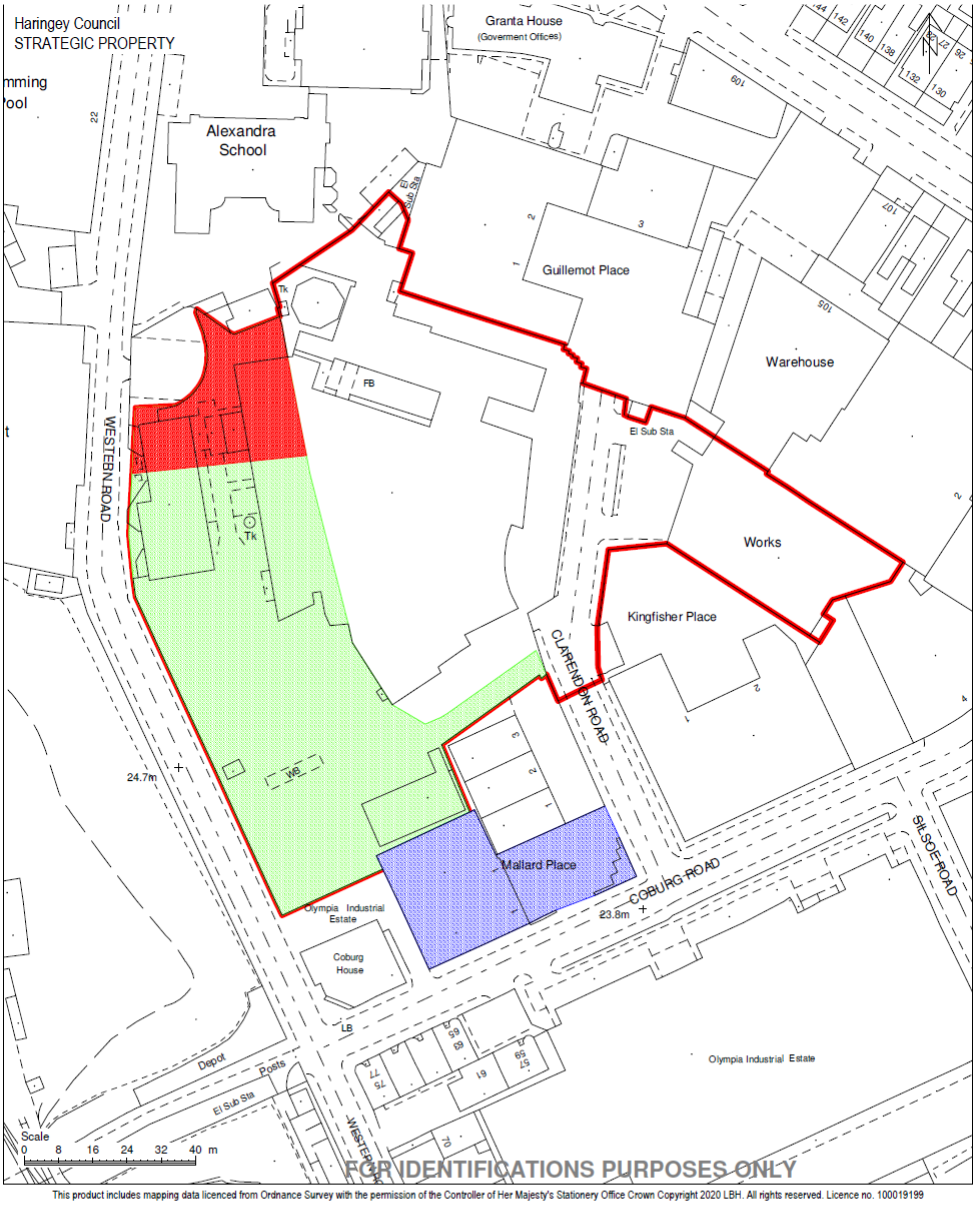
9. Use of Appendices

Appendix A – Plan showing leases to be acquired by the Council from Workspace plus the area (in red) for the existing lease to be extended
Appendix B - Indicative plan showing areas of land to be realigned
Appendix C - Plan showing proposed development on Council land Blocks E2/3 (outlined in blue) and additional development to be delivered by Workspace from the existing planning consent
Appendix D – Heads of terms
Appendix E – Valuation Appraisals Summary

10. Local Government (Access to Information) Act 1985

This report contains exempt and non exempt information. Exempt information is contained within Part B and **is not for publication.** The exempt information is under the following category (identified in amended schedule 12A of the Local Government Act 1972): S. (3) Information relating to financial or business affairs of any particular person (including the authority holding that information).

Appendix A – Plan showing leases to be acquired by the Council from Workspace plus the area (in red) for the existing lease to be extended



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Plan 3
Chocolate Factory,
Clarendon Road,
(N22 6XJ)

Red Verging - Site Boundary
Red Shading - leased area to Workspace to be extended to 250 years.
Green Shading - Council to acquire lease from Workspace
Blue Shading (Mallard Place) - Council to acquire lease from Workspace.

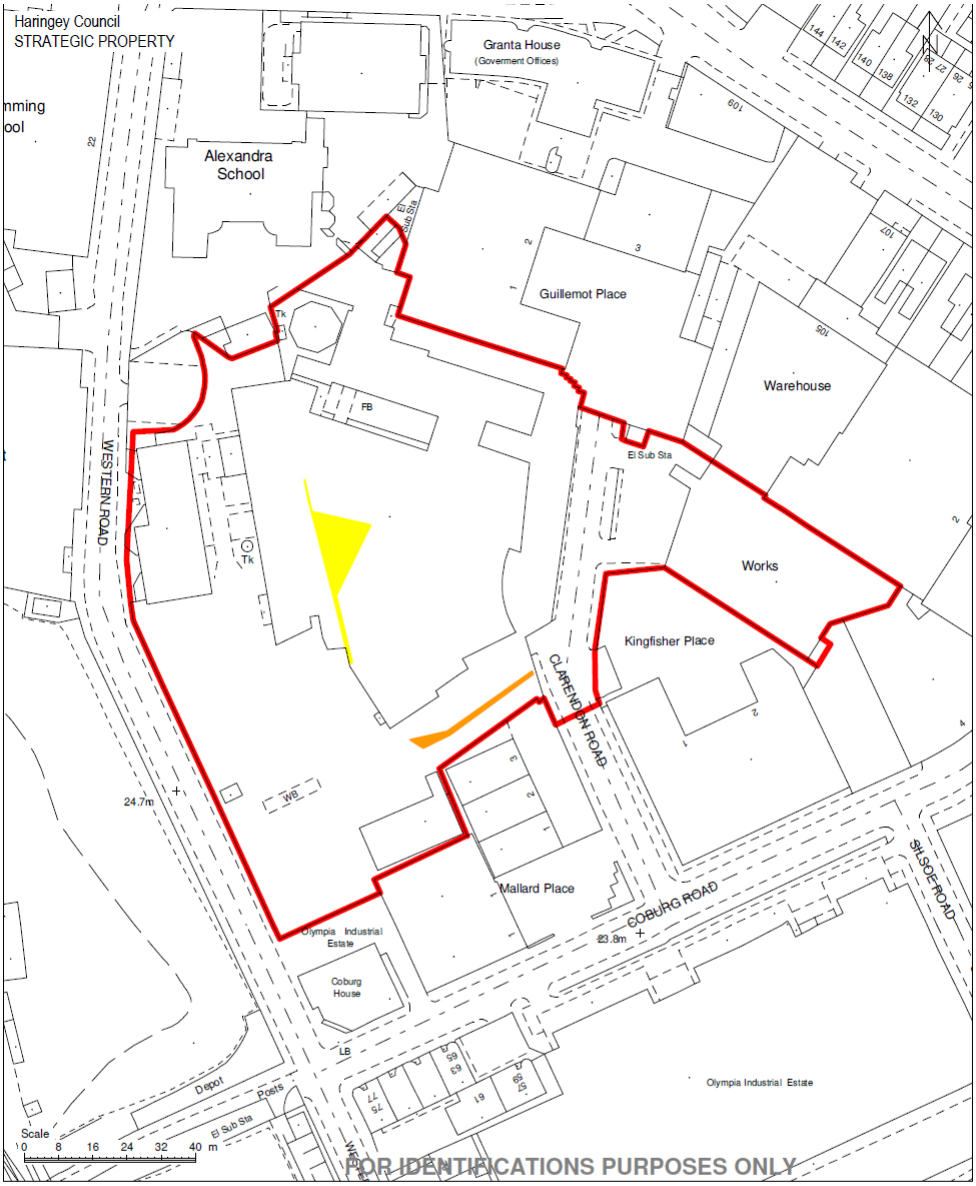
Overlay : Hss - Misc

Plan produced by Sean Purcell on 02/10/2020

Scale 1:1250

Drawing No. BVES A4 misc

Appendix B – Indicative plan showing areas of land to be realigned



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Plan 2
Chocolate Factory,
Clarendon Road,
(N22 6XJ)

Red Verging - Site Boundary
Yellow shading - Land to be acquired as part of land swap
Orange shading - Land to be disposed as part of land swap

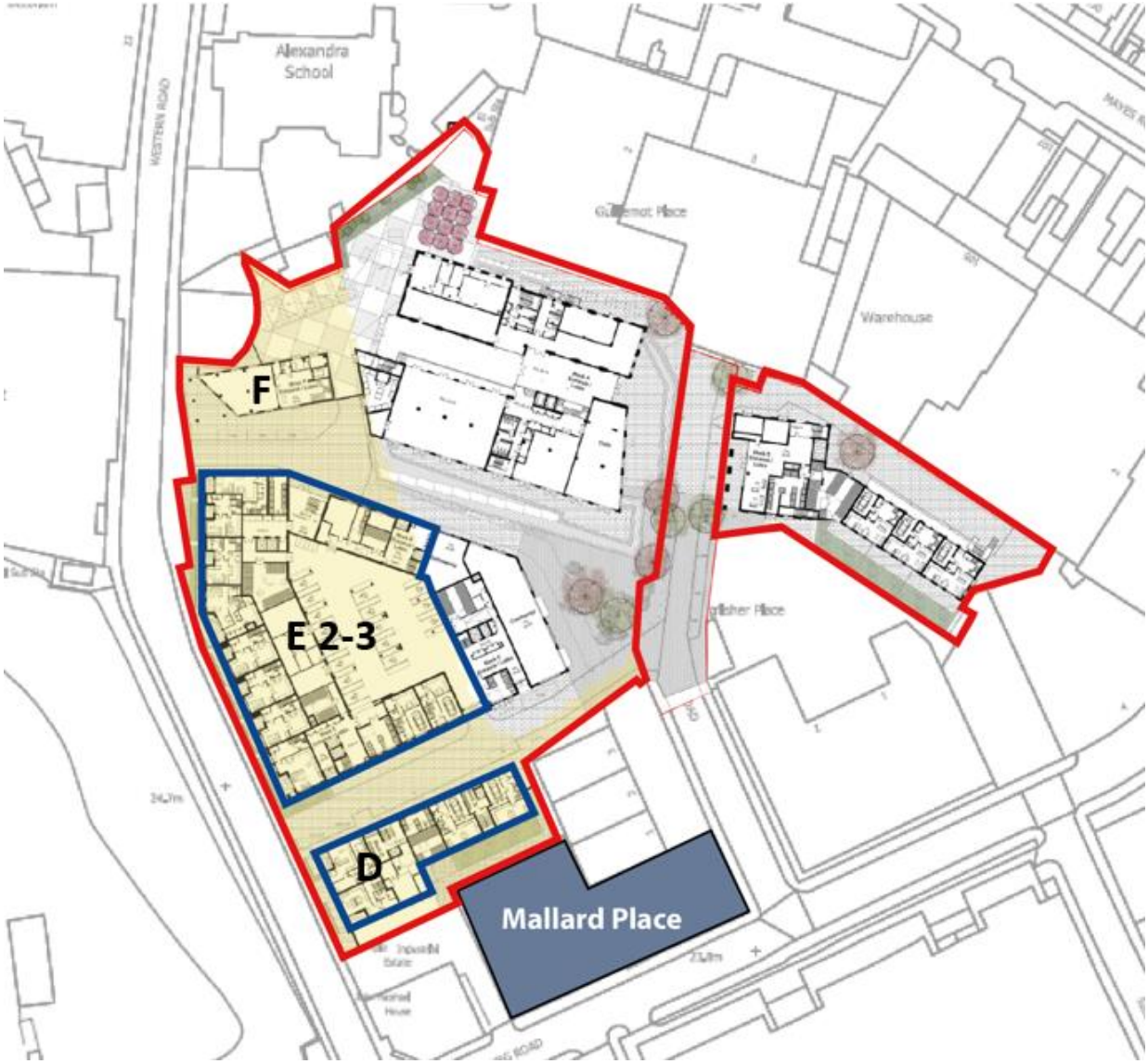
Overlay : Hss - Misc

Plan produced by Sean Purcell on 02/10/2020

Scale 1:1250

Drawing No. BVES A4 misc

Appendix C - Plan showing proposed development on Council land Blocks E2/3 (outlined in blue) and additional development to be delivered by Workspace from the existing planning consent



Appendix D – Heads of Terms

Heads of Terms for the Surrender of Leases at The Chocolate Factory and Mallard Place

The heads of terms are set out in Part B to this report.

Appendix E – Valuation Appraisals Summary

The valuation appraisals summary is set out in Part B to this report.

Agenda Item 15

Report for **Cabinet 13 October 2020**

Title: Award of a contract for provision of Icon Managed Service

Report authorised by : Director of Director of Customer, Transformation and Resources

Lead Officer: **Carla Villa, x3111, carla.villa@haringey.gov.uk**

Ward(s) affected: N/A

Report for Key/ Non Key Decision: **K**ey Decision

1. Describe the issue under consideration

This report seeks Cabinet approval, under Contract Standing Order (CSO) 11.02, for the early termination with the supplier's consent of the Council's existing contract for provision of the payment transaction processing managed service and, under CSO 9.07.1d which provides that contracts valued at £500,000 (five hundred thousand pounds) or more may only be awarded, assigned or novated by the Cabinet, and to award to the preferred supplier a contract for the same service including a mid call solution. This is for a contract period of 5 years with options to extend for a further 2 one-year periods.

2. Cabinet Member Introduction

The Council has a current contract for the provision and management of the payment transaction processing system due to expire in May 2022 which was let under the Crown Commercial Services (CCS) Local Authority Software Applications (LASA) framework which has now expired and can no longer be used. The Customer First programme would like to purchase a mid call solution to improve the customer journey when making payments. The LASA framework has been replaced by CCS's Data Applications (DAS) framework and it is proposed to call off from the DAS Framework a new contract for 5 years with options to extend for 2 further one-year periods for the Payment Processing managed service and for the new contract to include a mid call solution.

3. Recommendations

3.1 It is recommended that Cabinet approves, in accordance with Contract Standing Order (CSO) 9.07.1d), the award to the supplier identified in the exempt report of a contract for the payment processing managed service including a mid call solution for an initial 5-year term valued at £1,095,160.00 with options to extend for 2 further one-year periods together valued at £405,876.00 with a total contract value of £1,501,036.00 over the maximum term of 7 years.

3.2 It is also recommended that Cabinet approves, under CSO 11.02, the early termination, with the consent of the supplier, of the current contract with the same supplier which started up on 1/6/2019 and was due to expire on

Haringey LONDON

31/5/2022. This contract would be superseded by the one to be awarded under paragraph 3.1 above.

4. Reasons for decision

The current contact was called off from a LASA framework that has since expired so that further services cannot be called off from it. The Council intends to purchase a mid call solution as part of the Customer First programme which allows the customers services representative to stay on the line whilst payment is being made by the customer to help with any issues and deal with further queries they may have that are unrelated to the payment. The solution being purchased is PCI compliant and will prevent loss of income due to customers abandoning the call if they get stuck at any point and will improve the service offered to residents. The Council's current payment processing contract does not expire until 2022 but the intention is to terminate this contract and to let a new contract for 5 years with options to extend for 2 further one-year periods and include the mid call solution at the same time. This new contract is to be called off from the DAS framework which replaces the LASA framework. As the current contract only has a year left to run it seemed prudent that the new contract should be placed and that this should include the mid call element so that there is only one contract to manage, one invoice to pay and Cabinet can deal with all this in one go now.

5. Alternative options considered

Do Nothing – not an option as a mid call solution is required to ensure the Council is fully Payment Card Industry (PCI) compliant and to prevent customers losing income from abandoned calls.

Do a separate contract for a mid call solution to integrate with our current system - this would mean having two contracts with different end dates and could prove problematic when/if either contract expires.

Tender for a new contract - this would be a major piece of work, as the payment processing application integrates with many systems that take income, and could be disruptive. It is also not ideal during COVID when as little face to face contact is required as possible.

Research was carried out with a number of suppliers who could provide an alternative to the mid call solution but all were found to be more expensive. It was therefore decided to stay with the incumbent where integration is streamlined and compliant under PCIDSS.

6. Background information

Haringey operates the payments processing system to process card payments from customers, both face to face and online, which then interfaces into line of business applications, to SAP and the banks. The Council entered into a 3 year LASA framework call-off contract in 2018 which commenced in June 2019 and was due to run until 31/5/2022. The total cost of the contract was £489,999.99 or £163,333.33pa. The LASA framework has now expired and the Council through the Customer First programme would like to purchase a mid call solution but are unable to call off any further purchases under the LASA framework as it has expired and been replaced with the DAS RM3821

Framework. However, the Council could instead let a new contract under the DAS framework by way of a direct award. This is allowed under the framework's call-off criteria as the system integrates with all applications that take payment. As the current contract only has a year left to run, the supplier is prepared to agree to the early termination without penalties of the current contract and to enter into a new contract to be called off under the DAS framework, under Lot 1A and 2A, for 5 years with options to extend for further 2 one-year periods. A review of the suppliers under Lot 1A of the framework showed that only one provider could meet the criteria to supply a payments system. The DAS framework allows for direct award if the all the deliverables are available for call off/on the catalogue from the framework and the direct award complies with the framework award procedure.

Cost of payment processing managed service for 7 years	£1,190,231.00
Cost of mid call service for 7 years	£ 230,335.00
One off costs for mid call	£ 52,545.00
One off costs for payment processing	£ 27,925.00
Total contract value	£1,501,036.00

Avoided costs as a result of this contract include the following:-

RPI as the cost is fixed for all 7 years	£ 26,684
Mid call licence fees due under a separate contract	£ 28,500
Webpay Staff licence £45,000 less £12,500 leaving saving of	£ 32,500
Paylink conversion	£ 12,950
Parking system integration	£ 20,650
Total avoided costs	£121,284

The Council will receive a credit for the unused part of the current contract relating to payments for 20/21 and the aim is for the new contract to supersede that contract starting on the 30/10/20.

7. Contribution to strategic outcomes

Automate services where appropriate to enable customers to complete tasks easily/quickly as possible

- The Customer services agent will stay online with the customer to help provide guidance and deal with any subserquest queries
- Automated service that allows residents to pay for the services provided
- Reduces the number of attempts that residents make due to abandoning of calls as have encountered issues and required to call/queue again
- Increases the income as less abandoned calls

8. Statutory Officers comments (Chief Finance Officer, Head of Procurement), Assistant Director of Corporate Governance, Equalities)

Head of Finance

The contract award has two elements, namely the payment processing managed service and the purchase of a mid call solution.

The payment processing managed service will have (i) one-off implementation costs of £27,925 which will be funded from the Digital services programme (Scheme 602) within the Your Council capital programme; and (ii) ongoing costs of £170,033 pa (with no indexation uplift required) which represents a small increase of £6,700 pa on the current service and can be managed within the existing Digital Services revenue budget. The total cost over the maximum 7 year period of the contract is £1,218,156.

The Mid Call solution has been identified by the Customer First programme. It will have (i) one-off implementation costs of £52,545 which will be funded from the Customer First programme (Scheme 622) within the Your Council capital programme; and (ii) ongoing costs of £32,905 pa (with no indexation uplift required). The latter will be funded from a part FTE saving as a result of reduced end to end transaction times and from a significant expected increase in the amount of outstanding debt recovered from the improved customer journey that the solution provides. The total cost over the maximum 7 year period is £282,880.

Head of Procurement

Strategic Procurement supports the award of contract in accordance with the rules of the framework which allow for a direct award under the procurement framework is allowed. This complies with CSO 7.01(b)
A review of the suppliers offerings on the framework was undertaken and this determined that only one provider was able to meet our requirement and thus offered MEAT.
The direct award criteria requires that the requirement must be intrinsically linked to a system already within the customers organisation and that the products must be present on the Government eMarketplace which is correct for this award
The third requirement that the order form should be completed will be complied with once the Cabinet decion to award is agreed.

Assistant Director of Corporate Governance

This report is proposing the award of a contract by way of a direct award call-off from the Crown Commercial Service's DAS RM3821 framework agreement.

Pursuant to Contract Standing Order (CSO) 7.01(b) and Regulation 33 of the Public Contract Regulations 2015 the Council may award contracts called off under a framework established by another public sector body.

Strategic Procurement have confirmed that the DAS framework provisions allow for a direct award of a contract without the need for a mini-competition in calling off the proposed supplier.

Pursuant to CSO 9.07.1(c), contracts valued at £500,000 or more are to be awarded by Cabinet.

The Assistant Director of Corporate Governance is not aware of any legal reason preventing the approval of the recommendations in paragraph 3 of this report.

Equalities

The Council has a public sector equality duty under the Equalities Act (2010) to have due regard 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

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.

This report seeks decision on the procurement of a mid- call delivery solution to support customer service and manage customer payments to the council which is compliant with Contract Standing order 9.07.1d.

The ‘mid-call’ system as opposed to the ‘end-call’ system will benefit customer experience, supportin enhanced access and process completion. This is because with a ‘mid-call’ solution an officer remains on the phone line to help the customer with any issues throughout the process, thus reducing potential frustration and then need to re-call to access help.

The recommendation put forward in this report is not anticipated to have a negative impact on any groups with protected characteristics and can be seen as a positive move toward supporting a customer experience that is timely,safe and professional.

9. Use of Appendices

n/a

10. **Local Government (Access to Information) Act 1985**

This report contains exempt and non-exempt information. The exempt information is contained in the exempt report and is not for publication. The exempt information is exempt under the following category (identified in amended schedule 12A of the Local Government Act 1972 (3)):

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

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Report for: Cabinet 13 October 2020

Item number: To be added by the Committee Section

Title: Variation to the SAP Hosting and Support contract

Report authorised by : Richard Grice, Director of Customers, Resources and Transformation

Lead Officer: **Paul Dooley, CIO, paul.dooley@haringey.gov.uk**

Ward(s) affected: N/A

Report for Key/ Non Key Decision: Key decision

1. Describe the issue under consideration

This report seeks approval from Cabinet for the implementation of Contract Standing Order 10.02.1 b), which provides that variations to contracts valued at £500,000 (five hundred thousand pounds) or more may only be varied by the Cabinet.

2. Cabinet Member Introduction

I concur with the recommendations of this report. This recommendation is based on cost efficiency and service delivery.

3. Recommendations

3.1. For Cabinet to approve, under Contract Standing Order (CSO) 10.02.1b), a variation to the contract with Support Revolution Ltd for SAP Hosting and Support in order to confirm an option for the Council to request consultancy services to support work on the Council's ERP Improvement Programme between 01/10/2020 to (est.) 22/12/2021, at a value of a total of up to £272,000 (calculated based on pre-agreed rates) and to be ordered by issue from time to time of one or more purchase orders.

3.2. For Cabinet to approve, under Contract Standing Order (CSO) 10.02.1b) and pursuant to the variation referred to in paragraph 3.1 above, an initial order for a tranche of consultancy services valued at £130,000.

4. Reasons for decision

4.1. The Council is undergoing an ERP Improvement programme. ERP is a software platform at the core of Haringey's Finance, HR and other complex processes. It allows those processes in separate functions of the organisations to share data – co-ordinating the organisation. It is provided by a company called SAP and supported by an SAP partner organisation called Support Revolution.

4.2. The programme will deliver:

- A platform for insourced permanent recruitment by April 2020

- Process, policies, and technology solution for strategic procurement activity
- Significant improvements to our HR, Finance and other functions of ERP so that users can work faster and easier
- Fundamental changes to Finance, HR and other reporting making it more easily accessed and more effective

4.3. The programme requires access to planned resources which are within the scope of both the contract with our ERP support partner, Support Revolution, and the project scope and budget, to deliver.

4.4. The programme will allow decision making at an appropriate level for minor increases to and requests under the contract.

5. Alternative options considered

a. Do nothing – we will be unable to deliver the ERP Improvement Programme.
b. Insourcing talent – It will not be possible to recruit an in-house expert SAP team and have them operational in time to deliver the project.
c. Open market tender – rejected as would have to onboard a new SAP support partner which would involve purchasing support days from existing partner in any case and unlikely to lead to reduced price/unit.

6. Background information

6.1. Variations are provided for under the terms of the contract with the SAP support partner to allow for these instances where support for unexpected projects is required.

6.2. The Cabinet decision taken on 8th October 2019 to award the SAP support contract to Support Revolution at a saving of £330k, securing a low-cost base of professional support for a key organisational platform. This award had two key goals:

- Resourcing security i.e. advance notice of and availability of resources with a key partner.
- Stable cost base i.e. secure, costed expertise for assured delivery of the ERP Improvement Programme.

6.3.

Furthermore, stability and security/availability of SAP platform is core to future savings activities that rely on large scale automation and data availability across the organisation.

6.4. The full value of the consultancy services available under the proposed variation will not be awarded at one time but in tranches of work during the ERP Improvement Programme as and when required. The instruction to proceed with the provision of service will be by the issue of purchase orders for specific days and at day rates offered by the supplier in the original contract and to be confirmed in the proposed variation.

7. Contribution to strategic outcomes

The ERP Improvement Programme delivers both insourced recruitment technology and strategic procurement technology. Stability of our core ERP platform delivers key activities in Finance, HR and Accounts Payable as well as providing a platform for significant activities associated with process automation across the authority.

8. Statutory Officers comments

8.1. **Finance**

The ERP Improvement programme will deliver critical enhancements to the Council's core HR, Finance and Procurement systems that will result in improved processes and opportunities for future savings from standardisation and automation.
The Council's approved General Fund Capital Programme 2020/21-2024/25 includes a budget allocation of £3m within the Your Council priority for the ERP Improvement Programme (Scheme 607: Financial Management System Replacement). The delivery support days, costing up to £272,000 have been fully budgeted for within that allocation.

8.2. **Strategic Procurement**

CSP 10.02.1 provides that Cabinet authorise a variation to contract with a cumulative value of £500,000 or more.
The variation of contract is compliant with Public Contract Regulations 2015.
Strategic Procurement support the variation as it will secure value for money and meets the best value criteria

8.3. **Legal Commnets**

The report is seeking approval firstly for a variation to the contract as awarded by Cabinet. The variation is to confirm the option for the Council to request consultancy services over a specified timeframe in one or more tranches up to a maximum value based on rates offered by the supplier in the contract.

Approval is also sought for the exercise of that option in the form of an initial order for a tranche of services in the amount specified in paragraph 3.2 of this report.

Pursuant to CSO 10.02.1.b) read subject to CSO 3.01d), Cabinet must approve a variation where the aggregate value of the contract including the variation is in excess of £500,000 and the value of the variation was not included in the original Cabinet contract award approval.

The Assistant Director of Corporate Governance confirms that there are no legal reasons preventing Cabinet from approving the recommendations in paragraph 3 of the report.

Equality

The Council has a public sector equality duty under the Equalities Act (2010) to have due regard 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

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.

This report seeks a decision linked to the Council's SAP ERP system:

- To bulk purchase support days from the Council's SAP partner, Support Revolution

The recommendations in the report are not anticipated to have a negative impact on any groups with protected characteristics.

This expenditure associated with the recommendations is expected, acceptable within the terms of the SupportRevolution contract and is necessary for delivery of the ERP Improvement Programme. The ERP programme will have a positive impact on user experience both internal and external.

9. Use of Appendices

None

10. **Local Government (Access to Information) Act 1985**

Report fr Cabinet 8 October 2019, title Award of Contract for SAP Hositng an Support Services.
https://www.minutes.haringey.gov.uk/documents/s111633/SAP%20October%20Cabinet%20Report%20Clean%20copy.pdf

Important Additional Guidance on Accessibility

- Documents must be available for Councillor Hearn at the **same time** as for all other Councillors
- The council's primary typeface, Helvetica, should be used for all reports and accompanying documents, size 12 preferred (Arial font is also acceptable)
- Text should be as plain as possible with no boxes around it, Microsoft Word is preferred, not PDF, and no abbreviations (such as Cllr.) and try to keep symbols to minimal use
- Roman numerals are not suitable for a person using a screen reader so please use normal paragraph numbering/ lettering and bullet points where necessary
- Reports should be written without images, however, where images are used, report authors must provide a text alternative in all cases (a short paragraph explaining what the graphs, table, pictures etc are showing). Detailed examples can be provided by contacting ayshe.simsek@haringey.gov.uk

- Appendices
    - All of the above applies for appendices and report authors should avoid including lengthy PDF documents as part of the report
    - In some cases an executive summary could be more appropriate if Councillor Hearn is on the committee
- Presentations – if Powerpoints are to be used then a Word version must be submitted in advance of the meeting (and at the same time it is made available to all other members)
- The Democratic Services Team will not accept reports which are not in an accessible format.
- In the rare event that a documents is not in a fully accessible format the report author must submit, by the same report deadline, an accessible version for Councillor Hearn (if she is on the relevant committee)
- Plain text documents should be saved with document names including "DATE TITLE COUNCILLOR HEARN PLAIN TEXT"

Categories of Exemption

Exempt information means information falling within the following categories:

Part 1
1. Information relating to any individual.

2. Information which is likely to reveal the identity of an individual.

3. Information relating to the financial or business affairs of any particular person (including the authority holding that information)

4. Information relating to any consultations or negotiations or contemplated consultations or negotiations in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or holders under, the authority.

5. Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

6. Information which reveals that the authority proposes – (a) to give under any enactment a notice under or by virtue of which requirements are imposed upon a person; or (b) to make an order or direction under any enactment.

7. Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

Part 2
Qualifications to the above exempt information:
(a) Information falling within paragraph 3 above is not exempt information under that paragraph if it is required under – (a) the Companies Act 1985 (b) the Friendly Societies Act 1974 (c) The Friendly Societies Act 1992 (d) The Industrial and Provident Societies Acts 1965 – 1978 (e) the Building Societies Act 1986
(f) The Charities Act 1993.

(b) Information is not exempt information if it relates to proposed development for which the local planning authority may grant itself planning permission pursuant to regulation 3 of the Town and Country Planning General Regulations 1992.

(c) Information which – (i) falls within any of paragraphs 1-7 above; and (ii) is not prevented from being exempt under (a) or (b) above is exempt information if an so long as, in the opinion of the Monitoring Officer, in all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Report for: Cabinet 13th October 2020

Title: 54 Muswell Hill – to lease the ground and upper two floors to The Muswell Hill Practice to be used as a Health Centre for the local community

Report authorised by : Director of Housing, Regeneration and Planning

Lead Officer: Assistant Director Capital Projects and Property (Interim)

Ward(s) affected: Muswell Hill

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 This report seeks Cabinet approval to grant a 25 year lease of the Council's leasehold property at 54 Muswell Hill to the Muswell Hill Practice for the purposes of providing a GP practice in the Muswell area.

1.2 Currently the Muswell Hill area is the top priority in the North London area to find a solution to the existing health provision and the Council has been assisting the Clinical Commissioning Group (CCG) in finding a site for GP services in this area for some time. Currently the Council's leasehold property at 54 Muswell Hill is the only available site in the Council's control in this area that is suitable and matches the CCG requirements.

1.3 In October 2018 Cabinet approved the granting of a lease for the ground floor to three local GP practices for a term of 25 years and to fit out the accommodation as a Health Centre which would be funded through the Council's capital programme. The decision was subject to delegated authority to agree final terms to the Director of Housing, Regeneration and Planning after consultation.

1.4 However, following this decision, the CCG revised the area required for the facility. Initially their requirement went up to 1300 sqm with the accommodation at 54 Muswell Hill not being large enough. The CCG have subsequently found a solution for two of the GP practices on another site in the area and have requested that the Council lease the whole of the site (ground and two upper floors) to one GP practice (The Muswell Hill Practice) in order to provide a new health facility in the centre of Muswell Hill. This is subject to obtaining funding from the NHS. The current facility used by The Muswell Hill practice is located

in a residential building and is not ideally suited for the provision of Primary Care services.

1.5 The proposal is subject to the CCG obtaining NHS funding through the Estates and Technology Transformation Fund (ETTF) scheme in order to lease the property from the Council on a shell and core basis for 25 years at a premium and rental.

2. Cabinet Member Introduction

2.1 I am very pleased to bring this report to Cabinet today which recommends agreeing to lease the Council's property at 54 Muswell Hill to The Muswell Hill Practice. This will allow us to support our health colleagues in ensuring our communities have a very good quality local GP practice in an area where there would otherwise be a shortage. We have been working with the Haringey and Islington CCG and the NHS to help plan future care and health services in the borough. The leasing of the building for health purposes will provide a new modern health facility for this part of the Borough and also ensures the Council retains its interest in this asset.

3. Recommendations

3.1 Cabinet is recommended to agree:

a) To grant an under lease of 54 Muswell Hill (shown edged red on the plan attached in Appendix A) to The Muswell Hill Practice for a term of up to 25 years for a premium and/or rental income that would represent best consideration as set out in Part B to this report and as set out in the draft Heads of Terms attached and set out in Part B to this report. The costs of the transaction to the Council are set out in Part B to this report.
b) To give delegated authority to the Director of Housing Regeneration & Planning after consultation with the Cabinet Member for Finance and Strategic Regeneration to agree the final terms for the lease including the premium and/or rental amount that would represent best consideration.

4. Reasons for decision

4.1 The long lease of 54 Muswell Hill was acquired by the Council on 14th July 2017 to support the provision of GP services in this area. At the time of the 2018 Cabinet decision it had also been intended to include a small number of shared ownership residential units in this property. However, the structure and fire protection issues following Grenfell has made the residential units difficult to implement, and at the same time the CCG see a solution to their own medical services needs in taking a lease on the whole building rather than part of it as originally proposed. From the Council's perspective, this ensures a beneficial public use of this asset supporting health partners in local service delivery and secures a capital receipt for the Council whilst enabling the Council to maintain a long term interest in the property.

5. Alternative options considered

5.1 The alternative option is not to lease the building to The Muswell Hill Practice. However, this would mean that the existing Muswell Hill Practice would continue to not be DDA compliant and undersized for the current patient list.

5.2 In this option the building at 54 Muswell Hill would remain vacant until either a solution to the residential use of the upper floors is found and the ground floor let separately or the whole of the building is let for another use.

6. Background information

6.1 The Council has been working with the Haringey and Islington NHS Clinical Commissioning Group (CCG) to review the sites from which health and social care is delivered across both Haringey and Islington. This is part of the Council's wider objective of securing the highest standard of health and care for its residents by working collaboratively with the rest of the public sector. The Council's aim is to ensure that all residents have access to high quality care by further integrating primary care with social care and community and hospital health services.

6.2 The current Muswell Hill GP practice, currently operates out of a residential property in Muswell Hill. The premises are significantly undersized for their patient list and fails to comply with the Disability Discrimination Act and the Equality Act and are also not compliant with infection control standards. The GPs and CCG have spent two years considering various options for relocation of the GPs premises with this proposal being the optimum solution.

6.3 The granting of a new 25 year lease of the ground and two upper floors of 54 Muswell Hill to The Muswell Hill Practice for a new health facility will provide a new modern facility capable of serving up to 25,000 patients from one site.

6.4 The Council acquired the new build leasehold property at 54 Muswell Hill on 14th July 2017 as part of the land swap approved by Cabinet in October 2015. The property was acquired for general fund purposes. The two upper floors had been proposed to be part of an affordable housing project previously agreed by the Cabinet, although they have not been transferred to the HRA as they could not be completed due to fire legislation following the Grenfell tragedy.

6.5 The whole of the Council's interest being the ground floor and two upper floors of the building will be leased to The Muswell Hill Practice for a 25 year term providing premises to be used for the delivery of high quality, accessible primary care in Muswell Hill. This joint working with the CCG is a pioneering approach to integrated primary health and part of a wider approach to collaborating with the CCG and NHS on co-location and property requirements. The development will complement the existing, larger health centre in Hornsey (Hornsey Central Neighbourhood Health Centre), which hosts a number of Whittington Health community services, as well as a large GP practice and the Haynes Dementia Hub. These two locations together will support the Council's

ambitions to deliver high quality integrated health and care services in the West of Haringey.

6.6 This report seeks authority for the Council to grant a lease of the ground floor space and two upper floors at 54 Muswell Hill as a primary care facility to The Muswell Hill GP Practice for a term of 25 years. An agreement for lease will be entered into so the fit out works can be carried out first and the lease will be granted on practical completion of the works. A target date for occupation by the GPs is Autumn/Winter 2021. This is an alternative to the original proposal approved by Cabinet in October 2018 to lease the ground floor of the building only but failed as the premises were subsequently not considered to be big enough to accommodate the three practices. The Council are working directly with the GP practice and the CCG to ensure that the project costs and lease costs are covered by the CCG through ETTF funding.

6.7 The CCG have applied for ETTF funding for the fit out works and payment of the rental premium and rental so the agreement for lease will be subject to these conditions and should the funding be forthcoming The Muswell Hill Practice will be responsible for funding the fit out and lease. The funds available are restricted to £3m which will need to cover the fit out works and initial rental premium. The period will be set by the funds available based on the agreed rental value which will be reported at the Cabinet meeting. Therefore, the final heads of terms will include a premium covering part of the 25 year lease with a break clause allowing the GPs to continue the lease through a rental payment or break the lease. This will be subject to a delegated decision as set out in the recommendations.

6.8 The Council's advisers Carter Jonas are in the process of negotiating a premium and rental with the District Valuer acting for the Muswell Hill Practice with a figure to be agreed. This will be based on a market value and provide a premium representing best consideration to the Council for the 25 year lease based on shell and core on full repairing and insuring terms. The draft heads of terms are set out in Appendix B. This will be funded through ETTF funding (should the CCG be successful) together with the fit-out costs and the lease will be granted once the fit out is completed. The lease will include a service charge and will reflect the same terms as those set out in the 999 year lease held by the Council. The lease will be granted in line with the Council's acquisition and disposals policy which is contained within the Asset Management Plan. This is on the basis that the lease would support the Borough Plan's priorities and supports working in partnership with the NHS in supporting the Community.

6.9 The lease includes 6 car spaces on the site the value of which are included in the agreed premium.

6.10 The agreement for lease will also be subject to obtaining planning consent for a change of use on the upper floors to D1 use and also to the GPs obtaining ETTF funding. The decision on the funding by the NHS is due in December this year. Should this be forthcoming the works will be carried out from April 2021 with completion expected in the Autumn/Winter of 2021 at which point the lease will be completed. The agreement for lease will include a long stop date and milestones for the fit out works to be completed and the lease granted.

6.11 The risks in the proposal are principally for the NHS funding to be made available through the NHS ETTF fund which will be confirmed if successful in December 2020. The cost of the fit out works will also have a bearing on the funds available for the initial premium although once the period covered by the premium expires an annual rental will be payable by The Muswell Hill Practice. The CCG are working with The Muswell Hill Practice to secure funding through a business case and setting up the agreement with the Council to provide a lease and manage the fit out is key to this. Obtaining Cabinet approval to the lease forms a key part to the business case. An agreement for lease will be required subject to funding being obtained in order for the GPs to manage the fit out. Any additional costs will need to be funded by the GPs/NHS.

6.12 There is a risk that the NHS ETTF funding will not be secured by the CCG on behalf of The Muswell Hill Practice. In this case the Council will look to lease the ground floor for a commercial use and the upper floors will be reviewed in terms of potential for resolving the residential use or for other uses.

7. Contribution to strategic outcomes

7.1 The proposal will support the key elements for People and Place in the Borough Plan –

People - our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential

Place - a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green.

7.2 The new facility will bring a state-of-the-art Health facility funded through NHS ETTF funding to the residents in Muswell Hill through The Muswell Hill Practice.

8. Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

Finance

8.1 The decision to lease the property will generate a capital receipt (to be agreed with the District Valuer) from which costs of £0.05m will need to be deducted. In addition, a service charge will be payable by the tenant which is composed of a capped charge at approximately £1k per annum for soft facilities management and a charge reflecting the cost for hard facilities management
8.2 Finance comments are reported in Part B to this report.

Procurement

8.3 There are no procurement ramifications for the Lease of Council property to facilitate the health centre; property is outside the remit of the Public Contract Regulations 2015 (‘ the Regulations’)

8.4 Funding will be provided by the NHS for the lease and kit of out of the building there is , therefore, limited risk to the Council in approval**,** with the added benefit of capital receipts and a state of the art health centre for the local populace

Legal [Name and title of Officer completing these comments]
8.5 The Council has power under section 123 of the Local Government Act 1972 to grant the lease proposed in this report. The Council must obtain best consideration for the lease.

8.6 Members should note that the granting of the lease will be subject to funding being obtained from the NHS by the CCG.

Equality
8.7 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 people who do not
- Foster good relations between people who share those characteristics and people who do not.

8.8 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.

8.9 The proposal will enable provision of a GP practice in the Muswell Hill area. The average age of residents of Muswell Hill ward is higher than the Haringey and London averages. Older residents are more likely to live with disabilities and/or long-term health conditions. As a universal service, the new health facility will deliver benefits to residents with these protected characteristics, as well as residents with other protected characteristics.

9. Use of Appendices

Appendix A – Plan of the site
Appendix B – Heads of terms

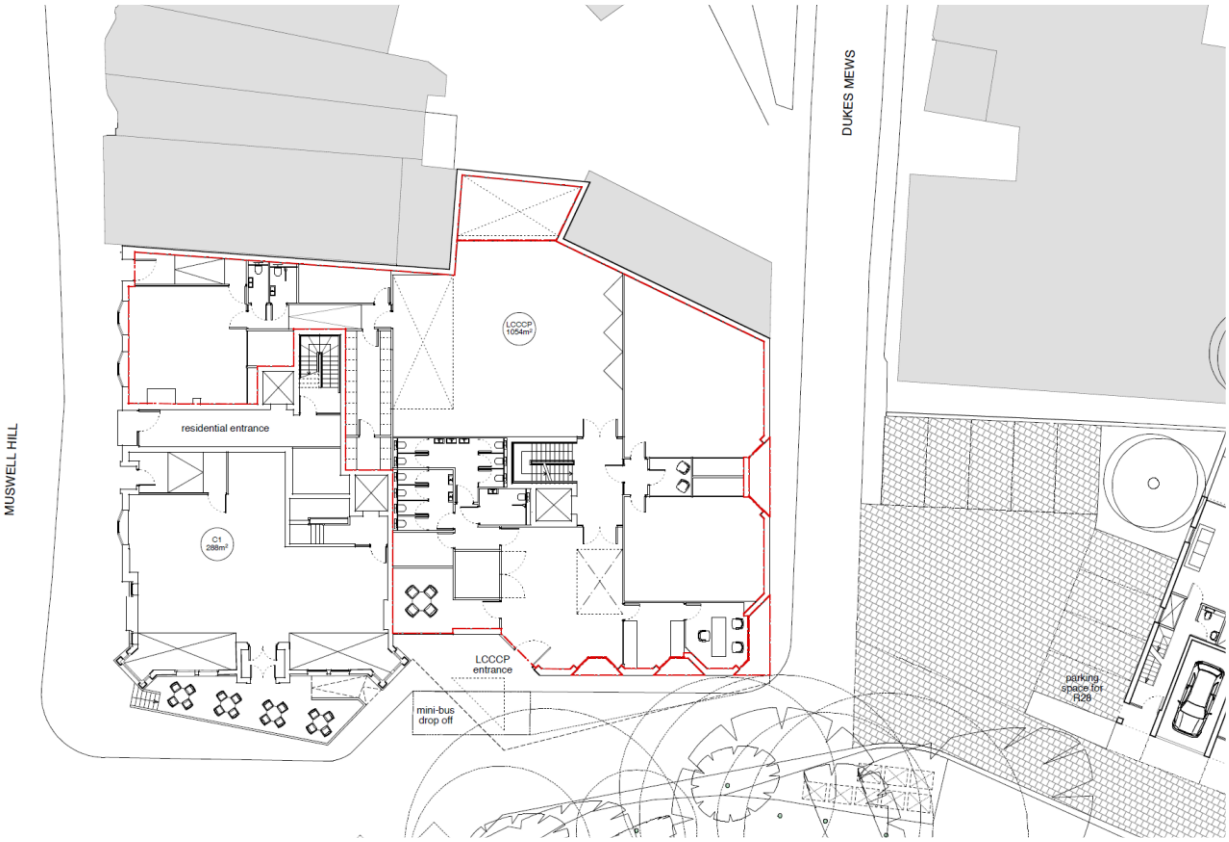
10. Local Government (Access to Information) Act 1985

This report contains exempt and non exempt information. Exempt information is contained within Part B and **is not for publication.** The exempt information is under the following category (identified in amended schedule 12A of the Local

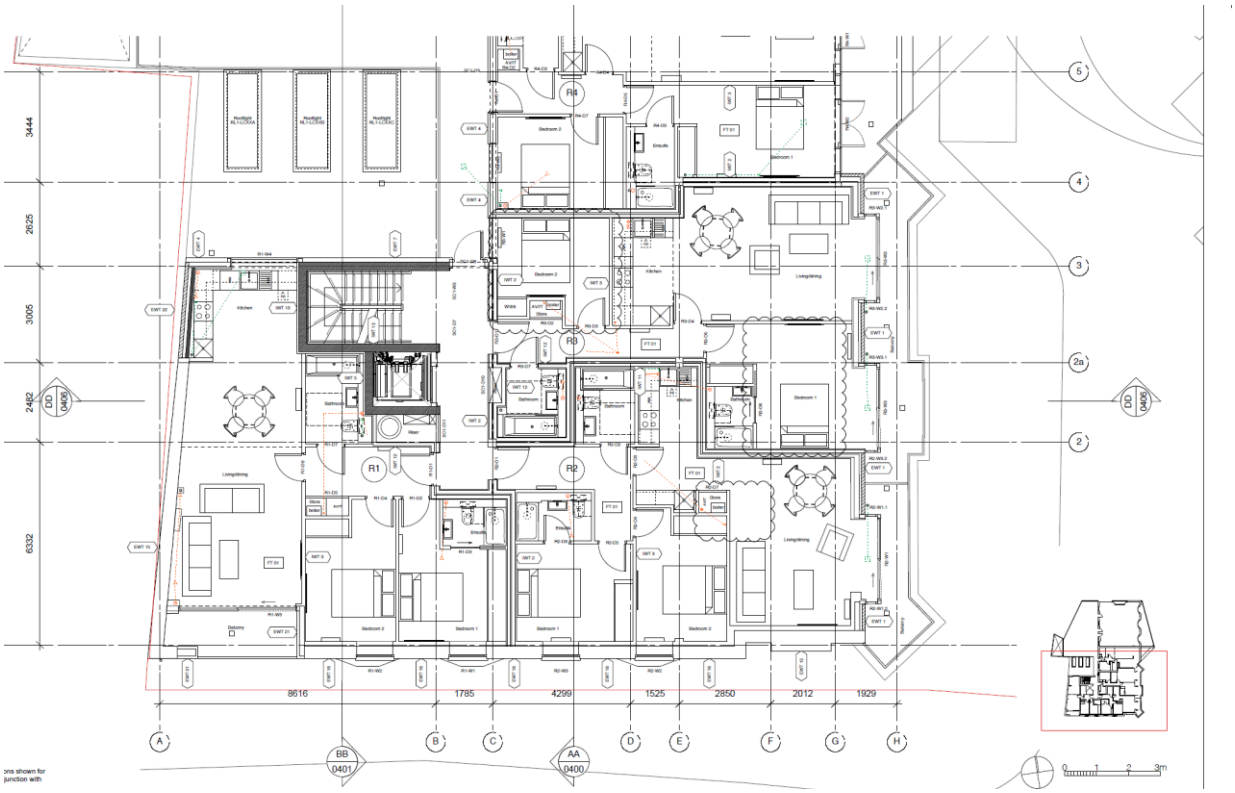
Government Act 1972): S. (3) Information relating to financial or business affairs of any particular person (including the authority holding that information).

Appendix A – Plans

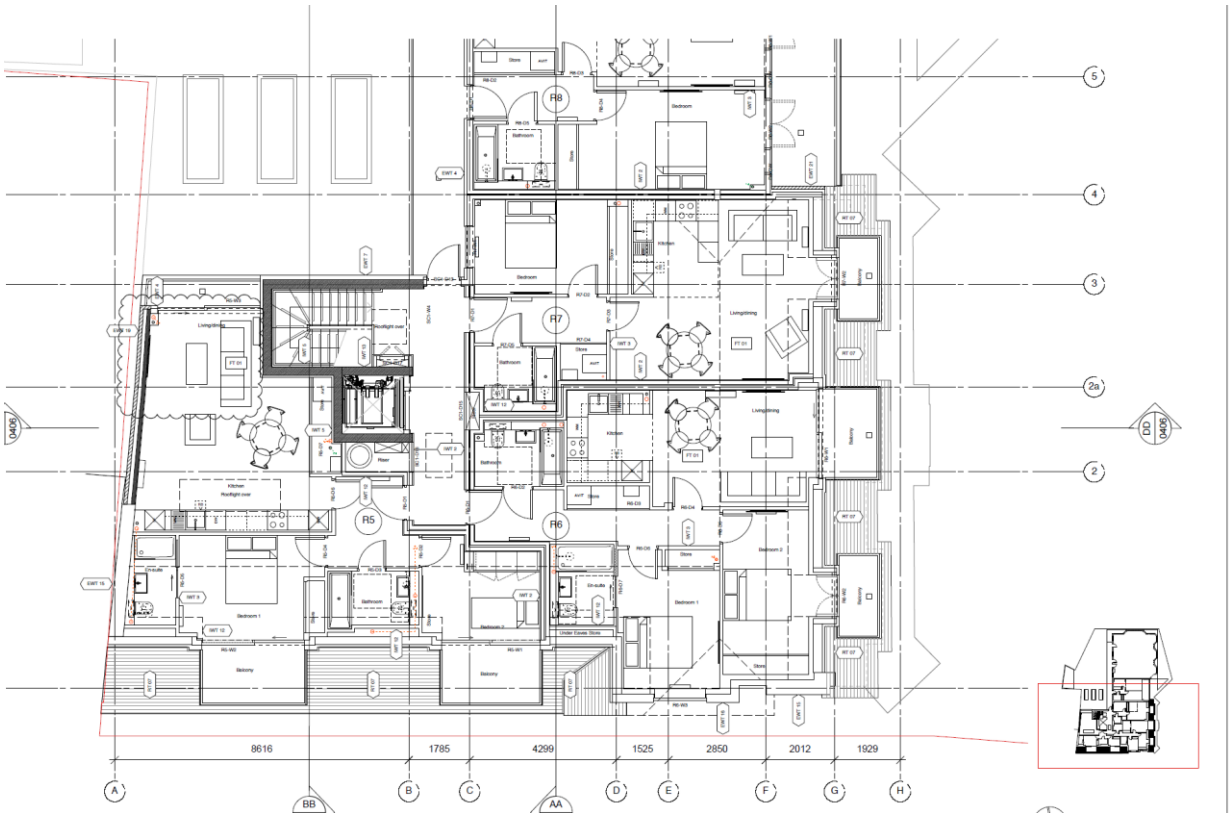
Ground floor plan


MUSWELL HILL
DUKES MEWS
residential entrance
C1
288m²
LCCCP
1054m²
LCCCP
entrance
mini-bus
drop off
parking
space for
R29

First floor plan



Second floor plan



Appendix B – Draft Heads of Terms
The draft heads of terms are set out in Part B to this report.

Report for: Cabinet 13 October 2020

Title: Internal Improvement (North) – Internal Major Works

Report authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Lee Whitby, Capital Works Delivery Manager, Homes for Haringey

Ward(s) affected: Woodside, Stroud Green, Noel Park, Bounds Green

Report for Key/ Non Key Decision: Key decision

1 Describe the issue under consideration

1.1 This report requests Cabinet approval for the award of a contract to contractor A (identified in the exempt part of the report) to carry out internal improvement works to 300 dwellings in the Woodside, Stroud Green, Noel Park and Bounds Green area. This will be for the sum of £2,354,041.

1.2 The report requests Cabinet approval for the issue of a letter of intent to the preferred contractor. This will be for an amount up to, but not exceeding, £235,404. This represents 10% of the contract sum.

1.3 The report also requests Cabinet approval for the contingency sum as set out in the exempt part of the report.

1.4 It is further recommended that Cabinet approves the professional fees of £230,719 which represents 9.801% of the contract sum.

2 Cabinet Member introduction

2.1 The proposed works to the dwellings in Woodside, Stroud Green, Noel Park and Bounds Green areas, will bring all homes up to the full Decent Homes Standard. The overall project will contribute towards achieving Haringey Council's objectives to increase the number of homes achieving the Decent Homes Standard across the borough. This will ensure all homes are safe and improve resident satisfaction.

2.2 The overall population of these wards mirrors that seen in Haringey more widely. Households in areas like Bounds Green are more likely to be rented by social housing tenants than the average within the borough. However, areas such as Stroud Green have smaller proportion of social housing tenants and a slightly larger proportion of owner/occupiers. The wards in this area have a mixture of high rise blocks and non-traditional dwellings.

3 Recommendations

3.1 Pursuant to the Council's Contract Standing Order (CSO) 9.07.1(d), for Cabinet to approve the award of a contract to the preferred contractor identified in exempt Appendix A for the renewal of kitchen, bathroom and internal electrics in the Woodside, Stroud Green, Noel Park and Bounds Green areas. This will be for the sum of £2,354,041.

3.2 For Cabinet to approve the issue of a letter of intent for an amount up to, but not exceeding £235,404 that represents 10% of the contract sum.

3.3 For Cabinet to approve the professional fees of £230,719 that represents 9.801% of the contract sum.

3.4 For Cabinet to approve the contingency sum set out in the exempt part of the report.

3.5 For Cabinet to note the total project costs set out in the exempt part of the report.

4 Reasons for decision

4.1 Homes for Haringey requires Cabinet approval to award the contract for internal works to 300 dwellings in the Woodside, Stroud Green, Noel Park and Bounds Green areas. This will enable the essential internal works such as the renewal of kitchens, bathrooms and internal electrics to progress. This is following a direct award in conjunction with Haringey Council's Procurement team via the London Construction Programme (LCP) framework and processes.

4.2 The award process was carried out in accordance with the framework requirements that was based on price. LCP carried out quality evaluation when they tendered the framework. The successful contractor satisfied the requirements in relation to these criteria.

5 Alternative options considered

5.1 An alternative option would be for Homes for Haringey to either use third party industry frameworks or a standalone OJEU compliant tender process to deliver the works. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined the LCP framework as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that concentrate their resources in the local area.

5.2 The option of not undertaking this work would leave Haringey Council open to residents' disrepair challenges and complaints, because the properties need to be improved to meet the Decent Homes Standard.

6 Background information

6.1 As the Landlord, the Council has a statutory and legislative duty to maintain the housing stock to a good state of repair. During the programme, the properties will be surveyed and all works required to ensure the properties meet the Decent Homes Standard will be undertaken. The scope of works to these properties will be carried out where required as follows: Internal refurbishment of kitchens, bathrooms (and where required adaptations), electrical upgrade works, asbestos survey and removal.

6.2 Homes for Haringey commissioned consultants Ridge and Partners LLP**,** as the multidisciplinary construction related consultant. The scheme under consideration will be designed, costed and project managed by Ridge in partnership with Homes for Haringey.

6.3 The project details are as follows: -

Number of dwellings in the project	300 units
Anticipated start on site	November 2020
Anticipated completion	August 2021
Contractor	Details in Appendix A (exempt report)

7 Consultation

7.1 Consultation with residents will take place to establish residents' choices and to identify any specific needs. A frequently asked questions (FAQ) sheet will be provided to answer some of the questions that may arise about the works.

7.2 The follow up residents' newsletter will update residents about progress and inform them about the appointment and details of the contractor.

8 Leasehold implications

8.1 There are no leaseholders' properties included in this project.

9 Conservation areas

9.1 Some of the properties in this project are within conservation areas. However, because the works will be carried out within the internal areas of the dwellings, no conservation area conditions are applicable.

10 Contribution to strategic outcomes

10.1 To ensure the Council fulfils its obligation as landlord, to maintain its housing stock.

10.2 This project will help to achieve the Borough Plan Outcome 3: 'We will work together to drive up the quality of housing for everyone'. This will include contributing to delivering the following objectives: -

- Improve the quality of Haringey's Council housing, including by ensuring that a minimum of 95% of homes meet the Decent Homes Standard by 2022.

- Improve residents' satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022.

- Ensure safety in housing of all tenures across the borough, responding to any new regulations as they emerge.

10.3 Outcome 3 which comes under the Borough Plan's Housing priority, for which the vision is for safe, stable and affordable home for everyone, whatever their circumstances.

Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

11 Finance

11.1 This project is included in internal works programme scheduled for 2020/21. The internal works programme budget is in the existing stock budget approved by full council in February 2020.

11.2 The cost of this project, including professional fees, is estimated at £2.58m and projected to be spent as shown below

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Financial year	Works	Fees	Total
Up to 31/03/2021	£0.43m	£0.04m	£0.47m
2021/2022	£1.92m	£0.19m	£2.11m
Total	£2.35m	£0.23m	£2.58m

11.3 The projected expenditures of £0.47m in 2020/21 will be met from the existing stock capital works programme 2020/21 budget.

11.4 The remaining projected expenditure of £2.11m is covered in the existing stock capital programme 2020/21-25 MTFS.

11.5 The project was tendered based on the framework pricing, commitment to meet project timescales and carry out the works. The named contractor was selected following an assessment of a submission deemed satisfactory and to have met the requirements.

11.6 No contribution to the cost of the project is expected from leaseholders as no leasehold property is affected.

12 Procurement

12.1 Strategic Procurement agree with this direct award through the new LCP (London Construction Programme) Major Works framework, permitted under the Contract Standing Order 7.01 (b) and compliant with PCRs 2015.

13 Legal

13.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.

13.2 The contract which this report relates to has been procured under the London Major Works Framework (LCP Framework).

13.3 The rules of the LCP Framework permit direct awards of contracts valued up to £2.5m.

13.4 The Assistant Director of Corporate Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

14 Equality

14.1 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 people who do not.
- Foster good relations between people who share those characteristics and people who do not.

14.2 The three parts of the duty apply to the following protected characteristics: Age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

14.3 The decision will primarily impact residents living in properties managed by Homes for Haringey, among whom women, people with disabilities and BAME people are overrepresented. There is no indication that this decision will result in any foreseeable negative impacts on any individual or group that shares the protected characteristics.

14.4 As a body carrying out a public function on behalf of a public authority, the contractor will be required to have due regard for the need to achieve the three aims of the Public Sector Equality Duty, noted above. Arrangements will be in place to monitor the performance of the contractor and ensure that any reasonably possible measures are taken to address any issues that may occur and may have a disproportionate negative impact on any groups who share the protected characteristics.

15 Use of appendices

15.1 Appendix A: Part A Exempt information.
Information relating to the financial or business affairs of any particular person (including the authority holding that information).

16. **Local Government (Access to Information) Act 1985**

16.1 Asset Management Strategy 2018-23
https://www.homesforharingey.org/repairs-and-maintenance/major-works

Report for: Cabinet 13 October 2020

Title: Internal Improvement (South) – Internal Major Works

Report authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Lee Whitby, Capital Works Delivery Manager, Homes for Haringey

Ward(s) affected: Tottenham Hale, Bruce Grove, White Hart Lane, Northumberland Park

Report for Key/ Non Key Decision: Key decision

1 Describe the issue under consideration

1.1 This report requests Cabinet approval for the award of a contract to contractor B (identified in the exempt part of the report) to carry out internal improvement works to 300 dwellings in the Tottenham Hale, Bruce Grove, White Hart Lane, Northumberland Park areas. This is for the sum of £2,290,009.60.

1.2 The report requests Cabinet approval for the issue of a letter of intent to the preferred contractor. This will be for an amount up to, but not exceeding, £229,000.96. This represents 10% of the contract sum.

1.3 The report also requests Cabinet approval for the contingency sum set out in the exempt report.

1.4 It is further recommended that Cabinet approves the professional fees of £224,443.84 which represents 9.801% of the contract sum.

2 Cabinet Member Introduction

2.1 The proposed works to the dwellings in the Tottenham Hale, Bruce Grove, White Hart Lane, Northumberland Park areas will bring all homes up to the full Decent Homes Standard. The overall project will contribute towards achieving Haringey Council's objectives to increase the number of homes achieving the Decent Homes Standard across the borough. This will ensure all homes are safe and improve resident satisfaction.

2.2 The highest concentration of social housing falls particularly in the White Hart Lane, Northumberland Park and Tottenham Hale areas. These wards are densely populated with comparatively lower life expectancy. The proposed Homes for Haringey works aim to provide decent homes,

improving the living conditions for its residents including the most vulnerable and the elderly.

3 Recommendations

3.1 Pursuant to the Council's Contract Standing Order (CSO) 9.07.1(d), for Cabinet to approve the award of a contract to the preferred contractor identified in exempt Appendix A for the renewal of kitchen, bathroom and internal electrics in the Tottenham Hale, Bruce Grove, White Hart Lane and Northumberland Park areas. This will be for the sum of £2,290,009.60.

3.2 For Cabinet to approve the issue of a letter of intent for an amount up to, but not exceeding £229,000.96 that represents 10% of the contract sum.

3.3 For Cabinet to approve the total professional fees of £224,443.84 that represents 9.801% of the contract sum.

3.4 For Cabinet to approve the contingency sum set out in the exempt report.

3.4 For Cabinet to note the total project costs of set out in the exempt report.

4 Reasons for decision

4.1 Homes for Haringey requires Cabinet approval to award the contract for internal works to 300 dwellings in the Tottenham Hale, Bruce Grove, White Hart Lane and Northumberland Park areas. This will enable the essential internal works such as renewal of the kitchens, bathrooms and internal electrics to progress. This is following a direct award in conjunction with Haringey Council's Procurement team via the London Construction Programme (LCP) framework and processes.

4.2 The award process was carried out in accordance with the framework requirements that was based on price. LCP carried out quality evaluation when they tendered the framework. The successful contractor satisfied the requirements in relation to these criteria.

5 Alternative options considered

5.1 An alternative option would be for Homes for Haringey to either use third party industry frameworks or a standalone OJEU compliant tender process to deliver the works. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined the LCP framework as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that concentrate their resources in the local area.

5.2 The option of not undertaking this work would leave Haringey Council open to residents' disrepair challenges and complaints, because the properties

need to be improved to meet the Decent Homes standard current decency levels.

6 Background information

6.1 As the Landlord, the Council has the statutory and legislative duty to maintain the housing stock to a good state of repair. During the programme, the properties will be surveyed and all works required to ensure the properties meet the Decent Homes Standard will be undertaken. The scope of works to these properties will be carried out where required as follows: internal refurbishment of kitchens, bathrooms (and where required adaptations), electrical upgrade works, asbestos survey and removal.

6.2 Homes for Haringey commissioned consultants Ridge and Partners LLP**,** as the multidisciplinary construction related consultant. The scheme under consideration will be designed, costed and project managed by Ridge in partnership with Homes for Haringey.

6.3 The project details are as follows: -

Number of dwellings in the project	300 units
Anticipated start on site	November 2020
Anticipated completion	August 2021
Contractor	Details in Appendix A (exempt report)

7 Consultation

7.1 Consultation with residents will take place to establish residents' choices and to identify any specific needs. A frequently asked questions (FAQ) sheet will be provided to answer some of the questions that may arise about the works.

7.2 The follow up residents' newsletter will update residents about progress and inform them about the appointment and details of the contract

8 Leasehold implications

8.1 There are no leaseholders' properties included in this project.

9 Conservation areas

9.1 Some of the properties in this project are within conservation areas. However, because the works will be carried out within the internal areas of the dwellings, no conservation area conditions are applicable.

10 Contribution to strategic outcomes

10.1 To ensure the Council fulfils its obligation as landlord, to maintain its housing stock.

10.2 This project will help to achieve the Borough Plan Outcome 3: 'We will work together to drive up the quality of housing for everyone'. This will include contributing to delivering the following objectives: -

- Improve the quality of Haringey's Council housing, including by ensuring that a minimum of 95% of homes meet the Decent Homes Standard by 2022.

- Improve residents' satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022.

- Ensure safety in housing of all tenures across the borough, responding to any new regulations as they emerge.

10.3 Outcome 3 which comes under the Borough Plan's Housing priority, for which the vision is for safe, stable and affordable home for everyone, whatever their circumstances.

Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

11 Finance

11.1 This project is included in internal works programme scheduled for 2020/21. The internal works programme budget is in the existing stock budget approved by full council in February 2020.

11.2 The cost of this project, including professional fees, is estimated at £2.51m and projected to be spent as shown below

.

Financial year	Works	Fees	Total
Up to 31/03/2021	£0.43m	£0.04m	£0.47m
2021/2022	£1.86m	£0.18m	£2.04m
Total	£2.29m	£0.22m	£2.51m

11.3 The projected expenditures of £0.47m in 2020/21 will be met from the existing stock capital works programme 2020/21 budget.

11.4 The remaining projected expenditure of £2.04m is covered in the existing stock capital programme 2020/21-25 MTFS.

11.5 The project was tendered based on the framework pricing, commitment to meet project timescales and carry out the works. The named contractor was selected following an assessment of a submission deemed satisfactory and to have met the requirements.

11.6 No contribution to the cost of the project is expected from leaseholders as no leasehold property is affected.

12 Procurement

12.1 Strategic Procurement agree with this direct award through the new LCP (London Construction Programme) Major Works framework, permitted under the Contract Standing Order 7.01 (b) and compliant with PCRs 2015.

13 Legal

13.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.

13.2 The contract which this report relates to has been procured under the London Major Works Framework (LCP Framework).

13.3 The rules of the LCP Framework permit direct awards of contracts valued up to £2.5m.

13.4 The Assistant Director of Corporate Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

14 Equality

14.1 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 people who do not.
- Foster good relations between people who share those characteristics and people who do not.

14.2 The three parts of the duty apply to the following protected characteristics: Age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.

14.3 The decision will primarily impact residents living in properties managed by Homes for Haringey, among whom women, people with disabilities and BAME people are overrepresented. There is no indication that this decision will result in any foreseeable negative impacts on any individual or group that shares the protected characteristics.

14.4 As a body carrying out a public function on behalf of a public authority, the contractor will be required to have due regard for the need to achieve the three aims of the Public Sector Equality Duty, noted above. Arrangements will be in place to monitor the performance of the contractor and ensure that any reasonably possible measures are taken to address any issues that

may occur and may have a disproportionate negative impact on any groups who share the protected characteristics.

15 Use of appendices

15.1 Appendix A: Part A Exempt information.

16. Local Government (Access to Information) Act 1985

16.1 Asset Management Strategy 2018-23
https://www.homesforharingey.org/repairs-and-maintenance/major-works

MINUTES OF MEETING URGENT DECISIONS HELD ON TUESDAY, 29TH SEPTEMBER, 2020, 1PM

PRESENT:

Councillors: Emine Ibrahim

ALSO ATTENDING:

49. APOLOGIES FOR ABSENCE

There were no apologies for absence.

50. DECLARATIONS OF INTEREST

There were no declarations of interest.

51. AMENDMENT AND EXTENSION OF THE ROUGH SLEEPER DISCRETION POLICY TO 31 MARCH 2021

The Cabinet Member for Housing and Estate Renewal considered the report which sought approval to adopt the amendments to the Rough Sleeper Discretion Policy as outlined in appendix 1 of the report; to delegate authority to the Director of Housing, Regeneration and Planning, in consultation with the Cabinet Member for Housing and Estate Renewal, to amend the policy to give effect to changes in legislation or statutory guidance; and to extend the period of application of the policy until 31 March 2021, unless terminated earlier or extended beyond this date by Cabinet / Cabinet Member decision.

The Council adopted a Rough Sleeper Discretion Policy on 27 July 2020 in order to continue to provide accommodation to specified categories of vulnerable homeless people falling outside the Housing Act duty who present themselves to the Council. To date, twelve vulnerable people have been accommodated under this policy. Due to the continued threat of Covid-19, especially over the winter period, it was proposed that the Discretion Policy should be extended to 31 March 2021, and add homeless people with Covid-19 symptoms as an explicit category of people to whom discretion will be applied for the duration of their illness.

The call-in process had been waived by the Chair of Overview and Scrutiny as to delay the implementation of the decision would risk public health by leaving the Council without policy on the accommodation of vulnerable rough sleepers during a period from 30 September, when Covid-19 cases are rising. The waiver of the call-in process was in accordance with Part 4, Section H and Paragraph 18 (a) and (b) of the Council's Constitution.

RESOLVED that

i. the Rough Sleeper Discretion Policy attached at Appendix 1 as amended in red be adopted;

ii. authority be delegated to the Director of Housing, Regeneration and Planning, in consultation with the Cabinet Member for Housing and Estate Renewal, to amend this policy to give effect to changes in legislation or statutory guidance, or directives or requests of a similar character issued by Government; and

iii. the period of application of this policy be extended to 31 March 2021, unless terminated earlier or extended beyond this date by Cabinet / Cabinet Member decision.

Reasons for decision
On 27 July 2020, the Council adopted the Rough Sleeper Discretion Policy to ensure that where homeless people vulnerable in the context of Covid-19 asked the Council for assistance they would continue to be accommodated. This policy was in the first instance to run until 30 September 2020, in order to assess its impact on the numbers of people accommodated. Having assessed this, and with Covid-19 a growing and significant risk, extending the policy to 31 March 2021 is appropriate, as is adding another category of people to whom discretion will be applied: homeless people who have symptoms of Covid-19.

Alternative options considered
The first alternative option is to return to the approach that was taken from 26 March 2020 to 27 July 2020: that is, to offer accommodation to anyone in the borough who is sleeping rough, or at risk of sleeping rough. The reason this option is not recommended is that local authorities have been directed by MHCLG to adopt locally appropriate policies, and the cost of continuing to provide emergency accommodation and welfare support to everyone sleeping rough, or at risk of sleeping rough, would be unsustainable.

The second alternative option is to return to the approach taken prior to 26 March 2020: that is to offer accommodation *only* to those to whom the Council owes a statutory homelessness duty. The reason this option is not recommended is that this would mean that a number of very vulnerable people who are at high risk from Covid-19 would not be provided with accommodation; and that even though there are anticipated to be only a relatively small number of such people, this would constitute a risk to public health.

CHAIR: Councillor Emine Ibrahim

Signed by Chair ……..

Date ……

MINUTES OF MEETING URGENT DECISIONS HELD ON MONDAY, 5TH OCTOBER, 2020, 4.00 PM

PRESENT:

Councillors: Joseph Ejiofor

ALSO ATTENDING:

52. APOLOGIES FOR ABSENCE

There were no apologies for absence.

53. DECLARATIONS OF INTEREST

None.

54. BUY BACK OF FUSION'S NEW RIVER LEASE AND PROVISION OF A SHORT TERM LEASE

The Leader considered the report which sought authority to acquire the New River lease from Fusion for the sum of the New River loan outstanding to the Council, and for Fusion to then pay back the New River loan to the Council and to grant Fusion a new short-term lease for 12 months which will include break clauses at six and nine months.

The Leader RESOLVED to

i. **agree the acquisition of the New River Lease from Fusion for a sum equal to the amount of the loan outstanding under the Loan Agreement dated 11 July 2014;**
ii. **agree to fund the acquisition through utilising the Responsiveness Fund capital budget and the approved capital programme contingency budget;**
iii. **agree to the Council leasing back part of the site (not subject to the Tenancies) to Fusion Lifestyle for a period of up to 12 months; and**
iv. **to note the Tenancies that will be directly managed by the Council on the site once the Head Lease is acquired (as set out in appendix C).**

Reasons for decision
Fusion have indicated that in order to restart their business they need to obtain a loan under the CLBILS funding arrangements. A condition of that scheme is that the bank supplying that loan needs to take a charge on all the assets of Fusion and the charge needs to rank equal to any existing charges granted by Fusion. On the 28th August 2020 a Cabinet Member decision agreed:

a) That the Council does not agree to Fusion's request to allow NatWest to take a security against the New River Lease.
b) In anticipation that Fusion may wish to hand back the lease to the Council, that the Council commissions a Leisure Management Options appraisal for the New River Sports Ground. The options to include proposals for the sale of the freehold, a new lease hold arrangement, direct management, or management by a third party.

As a consequence, Fusion have now offered the New River Lease back to the Council for the sum outstanding on the New River loan and for Fusion to repay this loan back to the Council.

The recommendation to accept the surrender of the lease for the sum outstanding and then for Fusion to pay back the loan to the Council represents a good financial proposition for the Council for the following reasons: -

- Since leasing the site to Fusion, the Council has not subsidised the site.
- The site has benefited from investment and been significantly upgraded since the lease was granted.
- The New River Lease has been valued by Wilks, Head and Eve (WHE) which demonstrates that the buy back of the lease is good value.
- The potential lease income per year for the site should meet the outstanding loan repayments and then from April 2030 would return an income that could be used to support other services.
- By taking the lease back the Council will be in full control of the site and free to review the future management arrangements.
- A short-term lease back to Fusion prior to the new management arrangements being implemented ensures that the site can reopen quickly allowing residents and clubs to participate in their chosen physical activity. It allows for an ongoing business to be maintained. It avoids the Council being liable for additional site management costs in this financial year. Fusion will accept all risk in the running of the site during a period of continued uncertainty related to Covid-19 and the national pandemic.
- It also means that an options appraisal, including an in-house option, can be developed in accordance with the Councils agreed Insourcing Policy (Oct 2019) and Insourcing Action Plan (Mar 2020). Following a further Council decision any transfer to another form of management can be done in a well-planned and careful way to ensure the best outcome for the Council, Fusion staff and site users.
- Based on the assumption that the Council agrees the recommendations in the report then Fusion plan to reopen the New River site on the 5th October 2020.

Alternative options considered

One alternative would be to refuse to accept the offer. However, this would mean that Fusion will be unable to obtain the CLBILS loan and this would cause severe financial difficulty to Fusion and make them more vulnerable to failure.

A Fusion failure is not in the best interest of the Council.

If Fusion were to become insolvent, then there would be no clear date for reopening the New River site.

In the event of Fusion becoming insolvent the Council has two routes available to it to recover its loss at New River.

The first is as landlord, in this situation the Council could forfeit the New River Lease and take the premises back into its control. In this instance the Council's loan would become an unsecured debt (which may have to be written off) but the Council regains control of the site and its future. Fusion or its liquidator could apply for relief from forfeiture and if that happens it will be for the courts to decide.

The second route available to the Council is to enforce its charge over the New River Lease and appoint an LPA Receiver to sell the New River Lease. In the event of a sale the Council would receive up to the amount outstanding under the loan from the sale proceeds. However, any amounts achieved over and above the outstanding loan would go to the Fusion or its liquidator to meet other Fusion debts. The site would be sold on the open market and the Council (as landlord) may have to agree to relax or remove some of the provisions in the New River Lease in order to achieve a sale to a third party in these circumstances.

In addition, if Fusion were to become insolvent then several new risks would be realised on the Leisure Management Contract that covers Park Road, Tottenham Green, and Broadwater Farm.

- The Council would need to step in and manage the facilities until a temporary or permanent arrangement could be put in place. This may include closing the centres for a period.
- All risks and costs of operating the leisure centres would return to the Council until such time as other arrangements are put in place.
- The cost of the leisure centre service in the case of Council step in is estimated to be considerably more than the current cost. An emergency tender for an interim operator is also estimated to cost the Council considerably more.
- The Council would also cease to receive the annual capital repayment for the loan related to the main leisure centre contract for Tottenham Green, Park Road and Broadwater Farm.
- The Council's abilities to achieve its MTFS savings over three years would be lost.
- The extent to which the Council could offer concessionary access to the centres could be reduced.

An alternative option was to bring the service back in house at the point of transfer of the lease back to the Council. This was rejected on the basis that it would not give adequate time to carry out the necessary TUPE consultation with staff employed at New River. Another option to address this TUPE issue was to second staff from

Fusion for a six month period, after receiving further legal advice this was rejected as TUPE would still apply to the Fusion staff from day one of the secondment.

CHAIR:

Signed by Chair ……..

Date ……

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of the Local Government Act 1972.

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