

NOTICE OF MEETING

REGULATORY COMMITTEE

Monday, 5th October, 2020, 7.00 pm - MS Teams (view it [here](#))

Members: Councillors Sarah Williams (Chair), Gina Adamou (Vice-Chair), Dhiren Basu, John Bevan, Mike Hakata, Luke Cawley-Harrison, Justin Hinchcliffe, Peter Mitchell, Reg Rice, Viv Ross, Yvonne Say, Preston Tabois and Noah Tucker

(Membership to be confirmed at the Full Council AGM on 1 October 2020).

Quorum: 4

1. FILMING AT MEETINGS

Please note this meeting may be filmed or recorded by the Council for live or subsequent broadcast via the Council's internet site or by anyone attending the meeting using any communication method. 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 FOR ABSENCE

3. URGENT BUSINESS

The Chair will consider the admission of any late items of urgent business. Late items will be dealt with under the agenda item where they appear. New items will be dealt with at item 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. MINUTES (PAGES 1 - 2)

To approve the minutes of the meetings held on 6, 14 and 31 July 2020.

Note: Minutes of the meetings 6 and 31 July 2020 to follow.

6. PLANNING SERVICES 2020/21 QUARTER 2 UPDATE (PAGES 3 - 14)

A report on the work of the Planning Service during July to September 2020.

7. NEW HARINGEY LOCAL PLAN - FIRST STEPS ENGAGEMENT (PAGES 15 - 312)

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.

8. RECENT GOVERNMENT ANNOUNCEMENTS ON PLANNING (PAGES 313 - 342)

This report provides information on the content of both consultations, sets out the Council's response to the Changes to the current planning system (which was submitted in advance of the closing date of 1 October 2020), and invites comment on the Council's draft response to the Planning for the Future White Paper which must be submitted by 29 October 2020.

9. NEW ITEMS OF URGENT BUSINESS

To consider any new items of urgent business admitted under agenda item 2 above.

10. DATES OF FUTURE MEETINGS

14 January 2021

11 March 2021

Emma Perry, Principal Committee Co-ordinator

Tel – 020 8489 3427

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Email: emma.perry@haringey.gov.uk

Bernie Ryan

Assistant Director – Corporate Governance and Monitoring Officer

River Park House, 225 High Road, Wood Green, N22 8HQ

Friday, 25 September 2020

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MINUTES OF MEETING REGULATORY COMMITTEE HELD ON TUESDAY, 14TH JULY, 2020, 10.00 - 10.05 AM

PRESENT:

Councillors: Sarah Williams (Chair), Mike Hakata, Peter Mitchell, Viv Ross and Yvonne Say

1. FILMING AT MEETINGS

The Chair informed the Committee that the meeting would be streamed live on the Council's website.

2. APOLOGIES FOR ABSENCE

There were no apologies for absence.

3. URGENT BUSINESS

None.

4. DECLARATIONS OF INTEREST

None.

5. AMENDMENT TO COMMITTEE MEMBERSHIPS

Members noted the paper as set out in the agenda pack.

RESOLVED that

- i. Councillor Sarah Williams be appointed as Chair of the Planning Sub Committee, and Licensing Sub Committee A; and**
- ii. The appointment of Councillor Noah Tucker to the Regulatory Committee be noted.**

6. DATES OF FUTURE MEETINGS

5 October 2020

CHAIR: Councillor Sarah Williams

Signed by Chair

Date

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Report for: Regulatory Committee 5 October 2020

Title: Planning Services 2020/21 Quarter 2 Update

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

Lead Officer: Dean Hermitage, Head of Development Management
Bryce Tudball, Planning Policy Team Manager
Bob McIver, Head of Building Control

Ward(s) affected: N/A

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

- 1. Describe the issue under consideration**
A report on the work of the Planning Service during July to September 2020.
- 2. Recommendations**
That this report be noted.
- 3. Reasons for decision**
Not applicable.
- 4. Alternative options considered**
This report is for noting and as such no alternative options were considered.
- 5. Planning Services 2020/21 Quarter 2 Update**

Development Management

- Applications during 2020/21 (1st April – 11th September): **1,301**
- Applications in same period 2019/20: **1,526**
- Number of cases on-hand end of August 2020: **513**
- Appeals decided during 2020/21 (1st April – 11th September): **11**
- Appeals dismissed (won) during 2020/21 (1st April – 11th September): **9**
- Cumulative performance (applications in time) 2020/21 (1st April – 11th September):
 - Majors: **100%**
 - Minors: **93%**
 - Others: **97%**
 - PS0: **90%**

Appendix One explains the categories of applications.

Performance overview

- 5.1 Performance is at 100% for 'Majors' applications and remains at the top quartile in London. Our performance for 'Minor' applications has remained in the top quartile in London at 93%. 'Other' applications are also maintained at top quartile in London at 97%. Performance remains steady and we expect to continue to be top quartile in all categories.
- 5.2 The Government has three measures of performance which the Council must remain within thresholds for. If we breach these thresholds we will be designated as a poorly performing planning authority and developers will then have the option of applying directly to the Planning Inspectorate for planning permission. This would mean that we don't get the fee income for that application but we are still required to undertake the consultation. In addition we lose the democratic right to determine the application. The first of these measures is our performance on a two year rolling period for determination of major applications. We are at 100% for this measure (the threshold is 50%). The second of the government thresholds relates to performance on minor and other applications over a two year period. We are at 96% on this measure (the threshold is 70%). The third of the government thresholds relates to overturns of refusals of applications on appeal and relates to minor and other applications. We are at 1% on this measure (the threshold is to remain below 5%).
- 5.3 So far in 2020/21 (1st April – 11th September) we have decided a total of 6 'Major' applications compared to the 9 decided during the same period in the previous financial year. The average time of decision has decreased from 147 to 130 days between these time periods, and all of these have been subject to planning performance agreements / extensions of time which are mutually agreed with applicants and encouraged in national guidance. The level of major applications submitted this year has reduced over previous years.
- 5.4 During 2020/21 (1st April – 11th September) we have decided 181 'Minor' applications compared to the 205 'Minor' applications decided during the same period in the previous financial year. The average decision day slightly increased from 76 to 82 days (a result of Covid-19 lockdown preventing public consultation, and thus slowing the process, throughout April and the first half of May).
- 5.5 During 2020/21 (1st April – 11th September) we have decided 472 'Other' applications compared to the 520 'Other' applications decided during the same period in 2019/20. The cumulative average decision time has increased from 61 days to 67 days (again due to lockdown).
- 5.6 The length of time taken to validate an application is at an average of 6 days, however this is a product of the systems thinking approach where there is a delay before validation rather than before decision.
- 5.7 The end to end times and the overall numbers of applications received, approved, and refused over previous years is set out below. Reducing the end to end times further will continue to be a focus for the coming year:

| | 2013-2014 | 2014-2015 | 2015-2016 | 2016-2017 | 2017-2018 | 2018-2019 | 2019-2020 | 2020-2021 (1 st April – 11 th Sept) |
|--------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|--|
| Received | 2951 | 3479 | 3907 | 4019 | 3399 | 3574 | 3094 | 1301 |
| Approved | 2372 | 2807 | 2935 | 3255 | 2659 | 2963 | 2576 | 1059 |
| Refused | 338 | 470 | 709 | 506 | 385 | 356 | 314 | 190 |
| Average day | 73 | 76 | 69 | 61 | 54 | 62 | 63 | 67 |

- 5.8 Officer caseloads have remained at around 40 throughout the 2020/21 financial year. The number of on hand applications is slightly lower than at this time last year and this is a reflection of our new approach as well as a focus on resolving a backlog of long standing applications. As of the end of August 2020, there were currently 447 on hand applications. The number of applications over 26 weeks is now at around 91. These cases are all complex or awaiting section 106 sign off.

Pre-application advice

- 5.9 During 2020/21 (1st April – 11th September) there have been 51 pre-application meetings generating a total of £123,638 of income compared to £150,882 generated from 65 pre-application meetings last year within the same period. During 2020/21 (1st April – 11th September) there have been 26 householder pre-application meetings generating £8,000 of income compared to £15,601 generated from 45 last year within the same period.
- 5.10 The use of Planning Performance agreements (PPAs) during the period 2020/21 (1st April – 11th September) has generated £88,507 in income from these agreements, compared to £64,953 last year within the same period.
- 5.11 Meeting the deadline for providing advice following pre-application meetings is steadily improving and continues to be a focus for the team.

Planning Decisions

- 5.12 The Planning Committee has met 3 times in 2020/21 so far (June, July and September) and resolved to grant planning permission for a zero carbon industrial park, 111 homes (10 of these were new council homes) and workspace.
- 5.13 It resolved to refuse against officer recommendation one application for 19 residential units and a retail unit.
- 5.14 The final government threshold relates to overturns of refusals (officer and committee) on major applications on appeal. We are currently at 7.55% on this measure (the threshold is to remain below 10%). It should be noted that because of the number of major applications that we determine is relatively low it does not need many appeals to be lost to bring us close to this threshold. Currently it would require 2 more losses to take us over the threshold. We have 2 major appeals pending.
- 5.15 The measure to be used to measure quality of planning decisions is the percentage of the total number of decisions made by the authority on applications

that are then subsequently overturned at appeal, once nine months have elapsed following the end of the assessment period.

- 5.16 The nine months specified in the measure enables appeals to pass through the system and be decided for the majority of decisions on planning applications made during the assessment period. The assessment period for this measure is the two years up to and including the most recent quarter for which data on planning application decisions are available at the time of designation, once the nine months to be allowed for beyond the end of the assessment period is taken into account. For example, a two year assessment period ending March 2021 will be used for designation decisions in Q1 2021/22. This allows for applications to be decided between April 2019 and March 2021 and a 9 month lag back to September 2018 for appeals to be decided (31 months). The average percentage figure for the assessment period as a whole is used.
- 5.17 The threshold for designation on applications for both major and non-major development, above which a local planning authority is eligible for designation, is 10% of an authority's total number of decisions on applications made during the assessment period being overturned at appeal.

- 5.18 Haringey's performance at present is as follows:

| Type of application | Number of apps | Number of appeals | Number of overturns | % (Threshold 10%) |
|---------------------|----------------|-------------------|---------------------|-------------------|
| Majors | 53 | 6 | 4 | 7.55 |

- 5.19 The Service has been relatively successful in defending major appeals. We have 2 live appeals on major applications. It is possible our decisions may be overturned. Bearing in mind a fall in the number of applications being submitted, losing a major appeal becomes significant.

- 5.20 Potential performance figures in March 2021 taking account of the appeals:

| Type of application | Potential Number of apps | Number of appeals | Potential Number of overturns | Potential % (Threshold 10%) |
|---------------------|--------------------------|-------------------|-------------------------------|-----------------------------|
| Majors | 50 | 6 | 5 | 10% |

- 5.21 Obviously the Service is doing all it can to defend these appeals and the service is likely to avoid designation. If we were to lose one pending appeal within this municipal year, we would potentially be at the 10% threshold. The Planning Inspectorate is experiencing delays which have meant that it has not met its own timescales. The knock on effect is that appeals are taking longer to validate and decide.
- 5.22 Before any designation is confirmed, local planning authorities whose performance is below one of the thresholds will be given an opportunity to provide clear evidence to justify corrections to any data errors and to set out any exceptional circumstances (supported by evidence) which, in their opinion, would make a designation unreasonable. A period of at least two weeks (as specified

by the department) will be allowed for this, and all such arguments will be taken into account before final decisions are made. Requests that exceptional circumstances should be considered are judged against two general tests:

- a. whether the issue affects the reasonableness of the conclusions that can be drawn from the recorded data for the authority, over the assessment period; or
- b. whether the issue had a significant impact on the authority's performance, for reasons that were beyond its control.

5.23 If we do breach the threshold we will construct a case against designation with potential mitigating factors. This would include reference to our exceptional performance in all other areas.

5.24 The Secretary of State will decide once each year whether any designations should be lifted, at around the same time as deciding whether any new designations are to be made. Exceptionally de-designations may be made at other times.

5.25 In assessing whether a designation should be lifted, consideration is given to:

- a. the potential capability of the designated local planning authority to deal effectively with applications for major or non-major development, as appropriate, in the future; and
- b. the effectiveness of the designated local planning authority in dealing with the relevant category of applications during the period of its designation.

5.26 Soon after a designation is made the local planning authority is expected to prepare an action plan addressing areas of weakness that it identifies as having contributed to its under-performance. In doing so the authority should draw upon sector support, particularly any support that is available through programmes funded by the Ministry of Housing, Communities and Local Government. The authority will need to agree the action plan with the Department.

5.27 A designation will be revoked if the Secretary of State is satisfied that:

- a. the designated local planning authority has provided adequate evidence of sufficient improvement against areas of weakness identified in an initial assessment of its performance; and provided that the designated local planning authority,
- b. would not, at the time that decisions about de-designation are made, remain eligible for designation on the basis of the data available at the time;
- c. has completed, within the timescale specified, any administrative tasks required of the authority in association with applications made directly to the Secretary of State in the area, in at least 80 per cent of cases during the designation period; and

- d. has not, in the view of the Secretary of State, caused unreasonable delay in progressing and signing any section 106 agreements associated with applications submitted directly to him during the designation period.

5.28 If, having considered these criteria, the Secretary of State concludes that the designation should remain in place, the local planning authority will be given at least two weeks to set out any exceptional circumstances (supported by evidence) which, in its opinion, would make a continued designation unreasonable.

Planning Enforcement

- Enforcement complaints received during 2020/21 (1st April – 11th September): 385
 - Enforcement notices served during 2020/21 (1st April – 11th September): 30
- 5.29 Of the complaints 93% were acknowledged within one working day of receipt. This measure is relatively static.
- 5.30 The Planning Enforcement Team continues to seek prosecutions against owners who have failed to comply with existing enforcement notices. In addition to the prosecution proceedings, there has been a concerted effort in securing confiscation sentences under the provisions of Proceeds of Crime Act (POCA) 2002. There are a number of prosecutions which are still going through the courts (these take a significant length of time). The Council is pursuing confiscation proceedings against a landlord, that could amount to a six-figure sum, which hopefully will serve as a deterrent.
- 5.31 Planning Enforcement officers have a backlog of site visits as a result of the Covid-19 lockdown. In addition, there are ongoing site access issues partly due to the need for social distancing which might impact on service delivery for the remainder of the year.

Member Training & Site Visits

5.32 The last Member visit, to the Thamesmead estate, took place in October 2019 and a daylight/sunlight training session took place in January 2020. Further training sessions are being planned in October 2020, December 2020 and at least one more before end of municipal year. A learning site visit is unlikely to take place in 2020.

Planning Policy & Infrastructure

New Local Plan

5.33 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 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.

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

| Document | Regulation | Revised date |
|---|------------|----------------------------|
| New Local Plan First Steps Engagement consultation | Reg 18 | November 2020-January 2021 |
| Draft Local Plan consultation | Reg 18 | 2021 |
| Proposed Submission Local Plan consultation | Reg 19 | 2021 |
| Submission & Examination | Reg 22-25 | 2021/22 |
| Adoption | Reg 26 | 2022 |

- 5.35 The New Local Plan First Steps Engagement consultation is the first step in preparing the New Local Plan and will provide 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.
- 5.36 Approval will be sought from Cabinet on 13 October 2020 to consult on the **New Local Plan First Steps Engagement document**. A separate report has been prepared for Regulatory Committee in relation to the New Local Plan First Steps Engagement which includes the draft Cabinet report and the First Steps Engagement document as an appendix.
- 5.37 The drafting of the document was informed by the **New Local Plan Member Working Group** comprising members of Regulatory Committee. Four meetings took place during July and August 2020 covering the four Borough Plan Priorities plus Town Centres.
- 5.38 Work has commenced on an **Integrated Impact Assessment (IIA)** for the New Local Plan which makes sure that emerging policies in the Local Plan have an overall positive impact on sustainability, equalities, health and habitats. This covers the requirements for Strategic Environmental Assessment (SEA) / Sustainability Appraisal (SA), Equalities Impact Assessment (EqIA), Health Impact Assessment (HIA) and Habitats Regulations Assessment (HRA). Alongside the New Local Plan First Steps Engagement document an IIA Scoping Report has been prepared for consultation. 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.

- 5.39 As this 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 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 and businesses. Subject to Cabinet approval, the consultation will take place from mid-November 2020. A comprehensive Communications and Engagement Plan has been prepared to ensure compliance with the Statement of Community Involvement (SCI) and support the objective of achieving effective, representative engagement with the public and key stakeholders.
- 5.40 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. Consultancy ORS is currently undertaking a new **Strategic Housing Market Assessment (SHMA)** and **Gypsy & Traveller Accommodation Assessment (GTAA)** for the New Local Plan and for the Council's new Housing Strategy, jointly with the Housing service. Consultancy Oxford Archaeology is currently carrying out a comprehensive review of **Archaeological Priority Areas** for the borough in support of the New Local Plan. Further evidence will be commissioned in late 2020 to inform the emerging Plan.

Other planning policy workstreams

- 5.41 On 6 August 2020 the Government published two documents for consultation. The first is titled '**Current Changes to the Planning System**' and the second is its '**Planning for the future: White Paper**'. A separate report has been prepared for Regulatory Committee on the two consultations and the Council's response to them.
- 5.42 The Mayor published his 'Intend to Publish' version of the **London Plan** on 17 December 2019. In line with a legal requirement to do so, the Mayor sent his Intend to Publish London Plan to the Secretary of State for his consideration. On 13 March 2020 the Secretary of State responded to the Mayor raising a number of concerns about the Plan particularly around future housing delivery and directing that a series of modifications be made before it is published, including to its employment policies. The Mayor and the Secretary of State are currently in dialogue to agree final wording of the London Plan.
- 5.43 The **North London Waste Plan (NLWP)** examination hearings took place on 20-21 November 2019. The NLWP team has subsequently drafted 'post-hearing' proposed modifications to the Plan, which, subject to agreement and approval by the Council and the other North London boroughs, will be consulted on in Autumn 2020. These include some points of clarification relating to the Pinkham Way

area. Following that consultation, the independent inspector's report will be expected in early 2021 with adoption later in 2021.

- 5.44 A **Draft Highgate School Supplementary Planning Document (SPD)** was agreed for consultation by Cabinet in March 2020. Consultation has been delayed until later in 2020 due to the Covid-19 crisis.
- 5.45 An **Article 4 Direction** to prevent changes of use from office to residential without planning permission was agreed by Cabinet in March 2020 and legally 'made' on 16 April 2020. Consultation on the Direction ran from 26 June to 7 August 2020 following a delay due to the Covid-19 crisis. The consultation responses are currently being collated and analysed. Subject to this analysis the Direction could take effect in June 2021.
- 5.46 An eight week consultation from 18 December 2019 to 11 February 2020 on the **CIL Partial Review: Draft Charging Schedule (DCS)** proposed increasing the CIL rate for residential development in the eastern zone of the borough from £15 per square metre to £50. The DCS also proposed an increase in the CIL rate for student accommodation from £15 to £85 and to introduce CIL charges for two new specialist housing uses which are Build to Rent at a rate of £100 and warehouse living at £130. The next stage is for the DCS to be submitted for independent examination and, subject to that examination being successful, will require final approval by the Council to take effect in 2021. A key issue that will be scrutinised as part of the examination will be the financial viability of the increased charges, particularly in the context of the Covid-19 crisis and the consequential economic impact and uncertainty.
- 5.47 The further progress of the **Wood Green Area Action Plan (AAP)** is dependent on the final confirmation of the proposals for the Council's own sites following a Cabinet decision on Council Owned Sites in Wood Green in July 2019 with further Cabinet decisions now expected in 2021. In the interim, the Planning Policy Team continues to work with the Regeneration service to strengthen the evidence base and ensure appropriate reference in the emerging New Local Plan.
- 5.48 A new **Housing Delivery Test Action Plan** was approved by Cabinet in July 2020 and published in August 2020.
- 5.49 The **Authority Monitoring Report (AMR) 2018-19** was published in January 2020 and was subsequently reported to Regulatory Committee for information. The Planning Policy Team has started preparing the AMR 2019-20 which will be published in December 2020.

Building Control

- Fee earning applications received 2020/21 (Apr – Sept*) – 766
 - Fee earning applications received 2019/20 (Apr – Sept*) – 1043
 - Fee income from applications 2020/21 (Apr – Sept*) – £277K
 - Fee income from applications 2019/20 (Apr – Sept*) – £341K
 - Site inspections 2020/21 (Apr – Sept*) – 2,143
 - Site inspections 2019/20 (Apr – Sept*) – 3,133
- *September = 22 September

- 5.50 Fee earning applications over the corresponding period show a 25% decrease due to Covid-19, although the fee income decrease is slightly lower at 20% - it is hoped that some of this income deficit can be recouped via the Government's income compensation scheme. Building Control continues to be asked to check applications outside of our borough (a sign that we are considered contactable, approachable and reliable), although we have to be careful in not taking on more applications than we can service, especially as the work on the major sites in the borough is becoming more surveyor intensive, requiring more and more inspections. Fee income continues to look positive, partly due to larger projects, such as Clarendon Road and Tottenham Hale schemes being on site. The New THFC Stadium has now hosted 45 events (including a number of matches 'Behind Closed Doors' as part of the Premier League/Government's 'Project Restart' initiative). Work continues at the Stadium and it is hoped that the permanent Safety Certificate will be issued early in the new football season. Building Control continues to be a key link between the Council and the Football Club.
- 5.51 Dangerous Structures have as always been ever prevalent, both within normal office hours and outside office hours with the team being called upon over 80 times so far since 1st April, including several major dangerous structures that have been classed as major incidents. During this period we have also served 2 formal Dangerous Structure Notices.
- 5.52 BC consult continues to grow in stature providing affordable expert advice to other Council services. This advice ranges from party wall agreements to feasibility studies to structural surveys to structural repairs to bridge inspections and strengthening to highways related works and so on. The consultancy work continues to grow and is widely used by colleagues in Homes for Haringey and continues to be respected throughout the Council. This growth has also been reflected in the fee income for this service, with the gross income for this area of work continuing to be around £400K.
- 5.53 During this period, the Government has issued the draft Building Safety Bill. The Government accepted the recommendations of the Hackitt Review and this draft Bill, which, alongside the existing Fire Safety Bill and fire safety consultation will set out the biggest improvements to building safety in nearly 40 years. Haringey Building Control along with colleagues across London has already developed an action plan that we are beginning to action that has put us in a very good position to be able to respond to the proposed challenges, this includes implementing ISO Standards that have been developed on our behalf by Local Authority Building Control (LABC), signing up to the LABC fire safety validation process, holding meetings with both the London Fire Brigade (LFB) and the Health and Safety Executive (HSE) and discussing schemes (from a fire safety point of view) with colleagues in Planning at a very early stage in the planning process. Building Control has successfully achieved the ISO accreditation (currently being audited) and all the surveyors in Building Control have successfully passed the Level 6A fire safety competency exams, which makes Haringey Building Control one of the most competent Building Control offices in the country, being ideally positioned for the challenges within the draft Building Safety Bill.

- 5.54 The last six months have been challenging for everyone, due to Covid-19. Clearly applications, site visits and fees are down in this period, but are slowly continuing to recover. Other aspects of our work have continued to return to normal, with elements at the same level or greater than at the same period last year.

6. Contribution to strategic outcomes

- 6.1 The Planning Service contributes to all Priorities of the Borough Plan.

7. Local Government (Access to Information) Act 1985

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

APPENDIX ONE

Definitions of Categories of Development

Major Development

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

Minor Development

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

Other Development

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

PS0

Approval of details, discharge of conditions, non-material amendments

Report for: Regulatory Committee, 5 October 2020

Title: New Haringey Local Plan – First Steps Engagement

Report

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

Lead Officer: bryce.tudball@haringey.gov.uk , Planning Policy Team Manager, x5965

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 Recommendations

2.1 That Regulatory Committee:

- 1) Notes and comments on the New Haringey Local Plan: First Steps Engagement consultation document (Appendix A);
- 2) Recommends to Cabinet that it 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);
- 3) Recommends to Cabinet that it 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 Climate Change and Sustainability 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).

3 Reasons for decision

- 3.1 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.

4 Alternative options considered

4.1 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.

4.2 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.

5 Background information

5.1 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

5.2 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

5.3 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).

5.4 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)).

5.5 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".

5.6 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".

5.7 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)."

5.8 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.

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

Intend to Publish London Plan (2019)

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

5.11 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

5.12 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

5.13 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.

Existing Haringey Local Plan (2017)

5.14 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).**

5.15 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

5.16 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.

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

- 5.18 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.
- 5.19 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

- 5.20 The Regulations set out the key processes that the Council must follow when preparing a New Local Plan.
- 5.21 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.
- 5.22 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

- 5.23 The Act requires Local Plans to "be prepared in accordance with the Local Development Scheme" (LDS) (S19(1)).
- 5.24 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

5.25 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.

5.26 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. |

5.27 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

Call for sites

5.28 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

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

5.30 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)).

5.31 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.

5.32 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

5.33 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
- 5.34 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.
- 5.35 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.
- 5.36 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.
- 5.37 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

5.38 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.

6 Contribution to strategic outcomes

- 6.1 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.
- 6.2 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).
- 6.3 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.

7 Statutory comments

Finance

- 7.1 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.
- 7.2 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

- 7.3 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

- 7.4 The main legislation, policy and guidance relevant to Local Plans is summarised throughout this report.
- 7.5 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

- 7.6 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.
- 7.7 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.
- 7.8 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.
- 7.9 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.
- 7.10 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.

- 7.11 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.
- 7.12 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.
- 7.13 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.
- 7.14 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.
- 7.15 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 to deploy revised methods to ensure successful targeting of protected groups.

- 7.16 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.

8 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

9 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 \(December 2019\)](#)

APPENDIX A

New Local Plan

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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 Kirsten Hearn - Cabinet Member for Climate Change and Sustainability



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

1.1. What is the Local Plan?

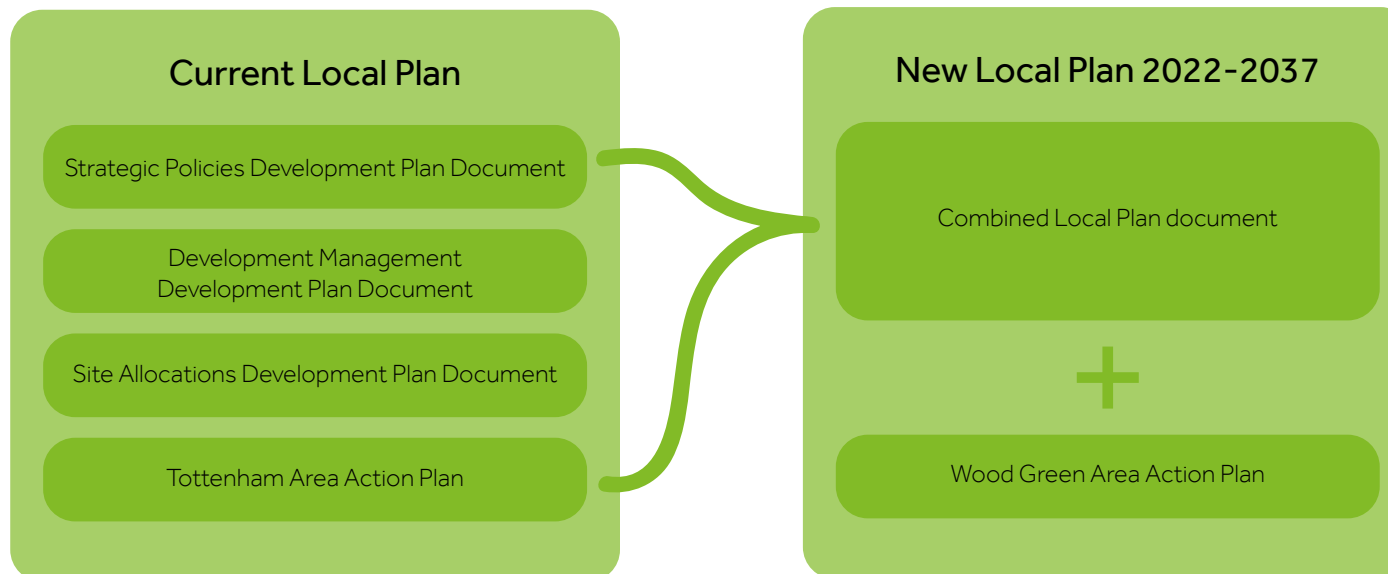
The Local Plan is a document that sets out the vision and objectives for future development of the borough. It provides a positive strategy and policies to enable significant growth such as new homes, employment, leisure and cultural facilities and infrastructure, while protecting and enhancing our heritage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



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:

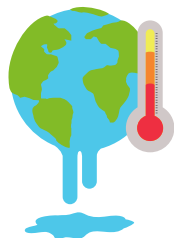
Housing: A safe, stable and affordable home for everyone, whatever their circumstances.

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.

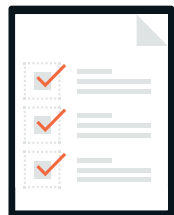
Economy: A growing economy which provides opportunities for all our residents and supports our businesses to thrive.

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,

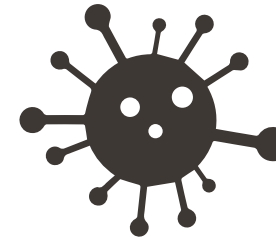
which include Wood Green & Lee Valley Opportunity Areas. The Plan also contains detailed policies on design, housing, social infrastructure, heritage & culture, green infrastructure & natural environment, sustainable infrastructure, and transport.

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.

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.

Reason 5: Respond to housing delivery challenges



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

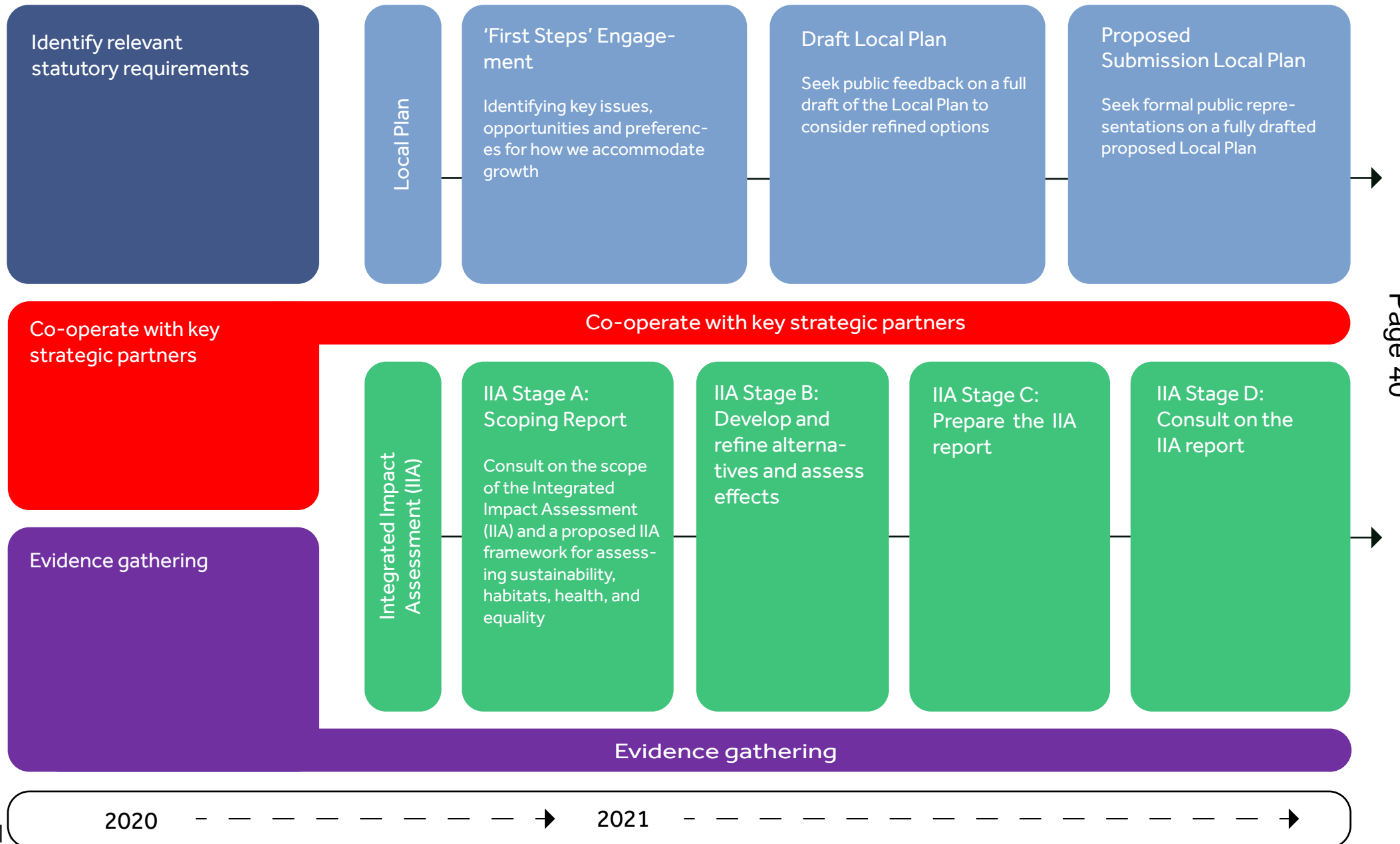
Of particular note are:

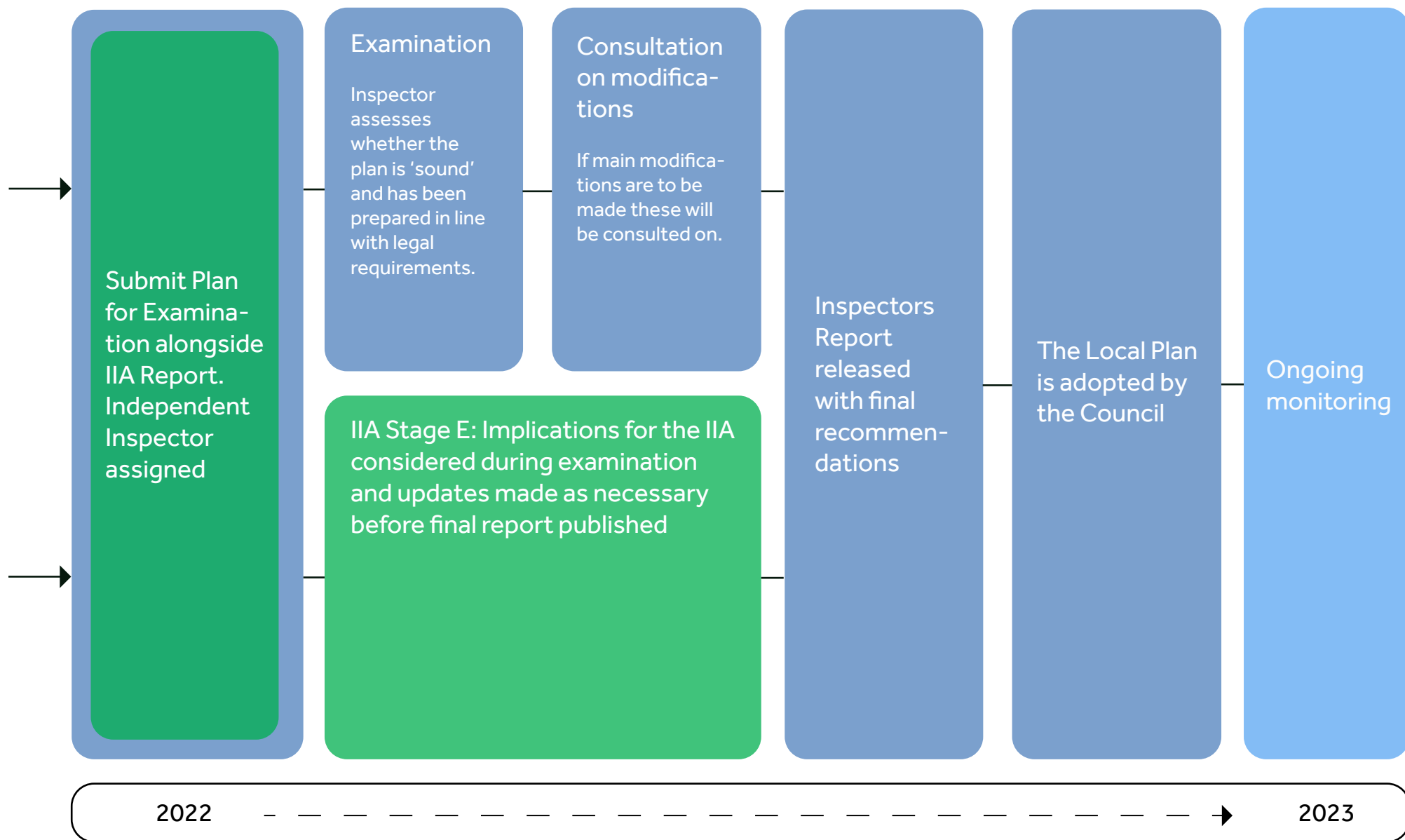
- A ten-year minimum housing target of 15,920 homes over the period 2019/20 to 2028/29
- A ten-year minimum housing target of 2,600 homes on small sites over the same period



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:





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

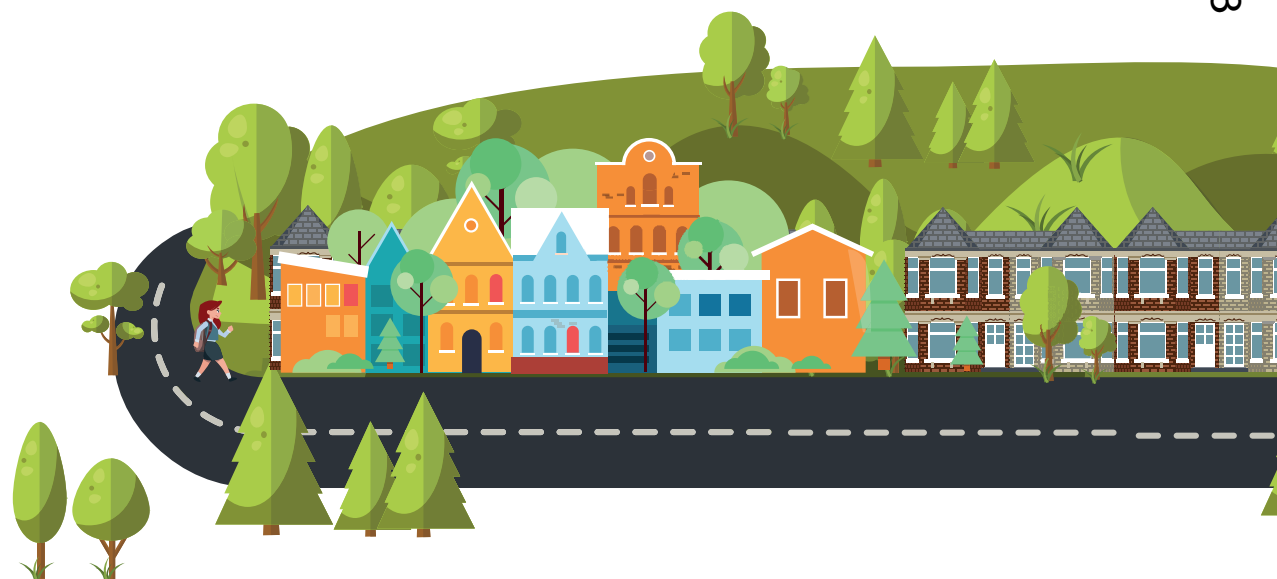
designed to ensure that through the development of the Local Plan the effects of its policies, need for any mitigation and reasonable alternatives are adequately considered so that the decision-making process is an informed one. It brings together the following assessments, some of which are requirements 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 Assessment** 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.

[Blurb on libraries tbd]

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**.

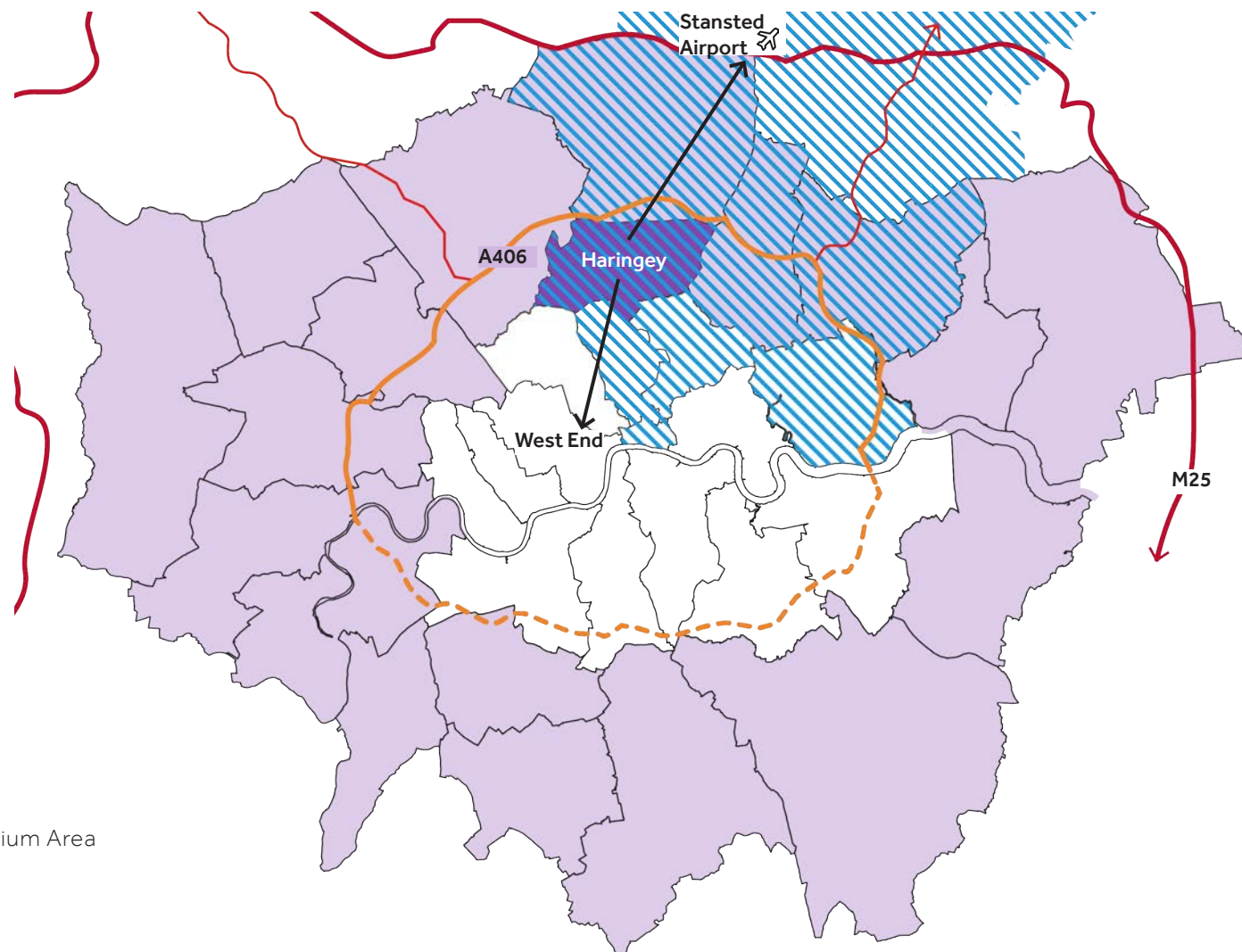
3. The Big Picture

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-Stansted-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:

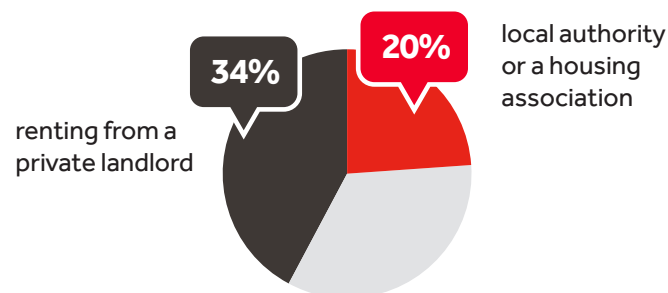
- ↑ Growth in overcrowding, homelessness and rough sleeping.
- ↑ Increased levels of poverty, indebtedness, evictions and forced relocations.

More homeowners in west

More social rented housing in the east

Haringey

As of 2018 most residents lived in a rented property



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.

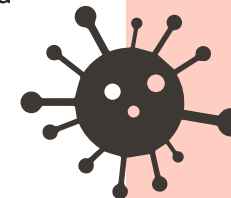
IN 2019 MORE THAN

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

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

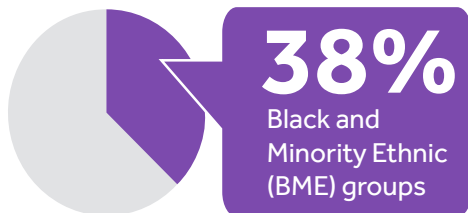


There are major risks to wellbeing from living in overcrowded homes without access to quality open spaces

People

DIVERSITY

HARINGEY IS
A HIGHLY
DIVERSE
BOROUGH

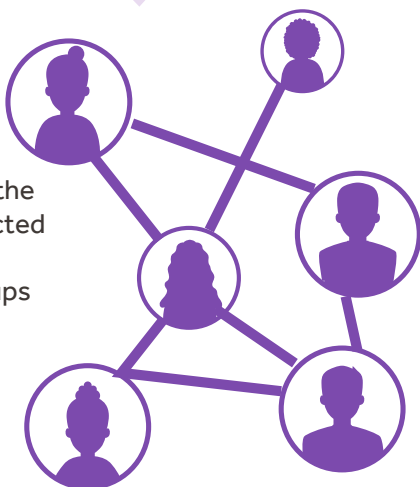


LANGUAGE

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

OVER
180
languages
are spoken by
Haringey residents

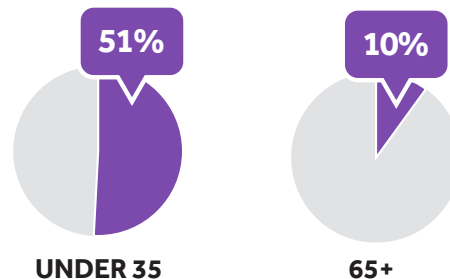
The diversity of the
borough is reflected
by a mosaic of
community groups
and networks



AGE

The borough has a young
population

IN **2018**



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

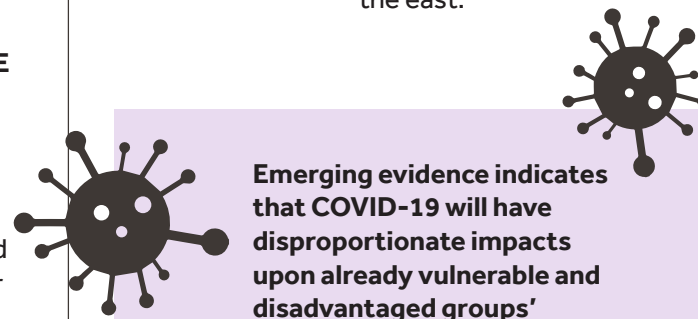
INEQUALITY



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'**

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



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

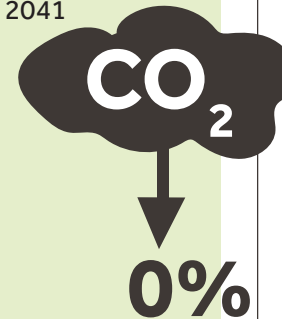
in March 2020 with a 2027 target for the Council to be zero-carbon and a 2041 target for Haringey as a whole

ZERO-CARBON COUNCIL BY

2027

ZERO-CARBON BOROUGH BY

2041



HARINGEY HAS REDUCED ITS CARBON EMISSIONS BY

35.9%

since 2005



THE BOROUGH HAS

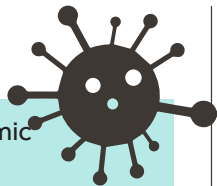
25 Green Flag Parks

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



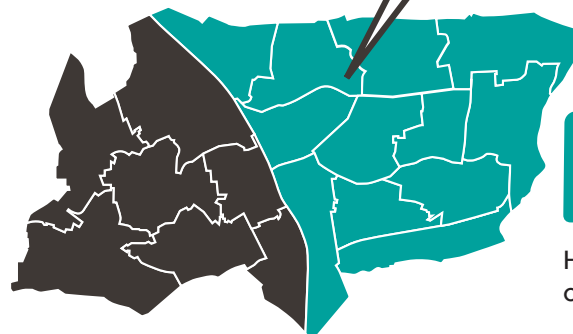
HARINGEY LONDON

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.



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



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.

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.

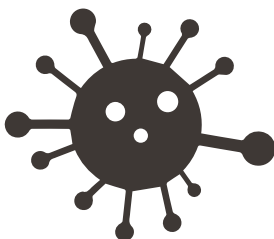
Helping prevent Climate Change and address potential effects



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**

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

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



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



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



Has expanded its exciting cultural and creative offer



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



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



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



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



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



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



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 community 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.

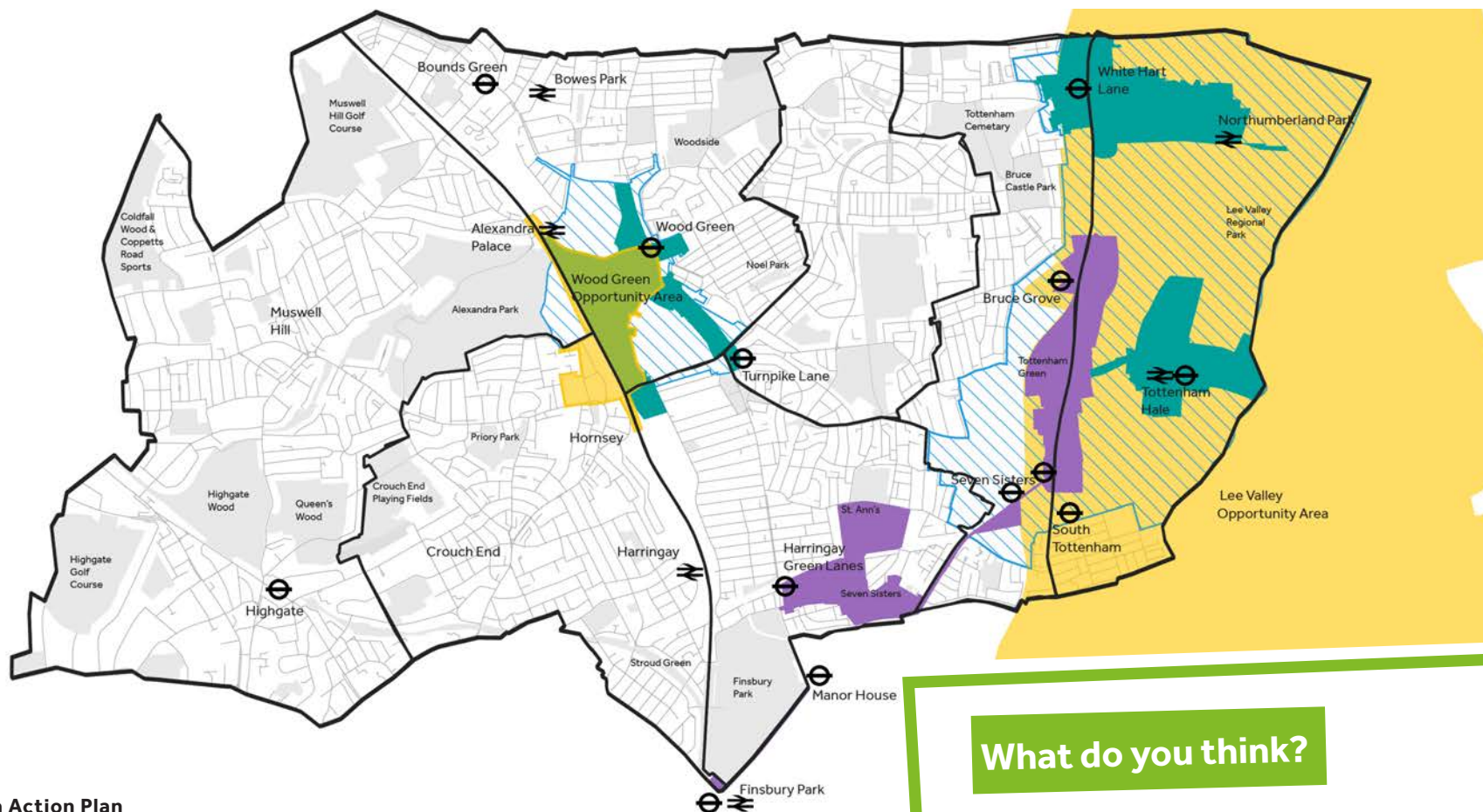
The London Plan identifies that this Opportunity Area has the capacity for around 21,000 new homes and 13,000 new jobs, of which 10,000 new homes and 5,000 new jobs are currently planned for within Haringey, as identified in the Tottenham Area Action Plan (AAP). A large number of the major development 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

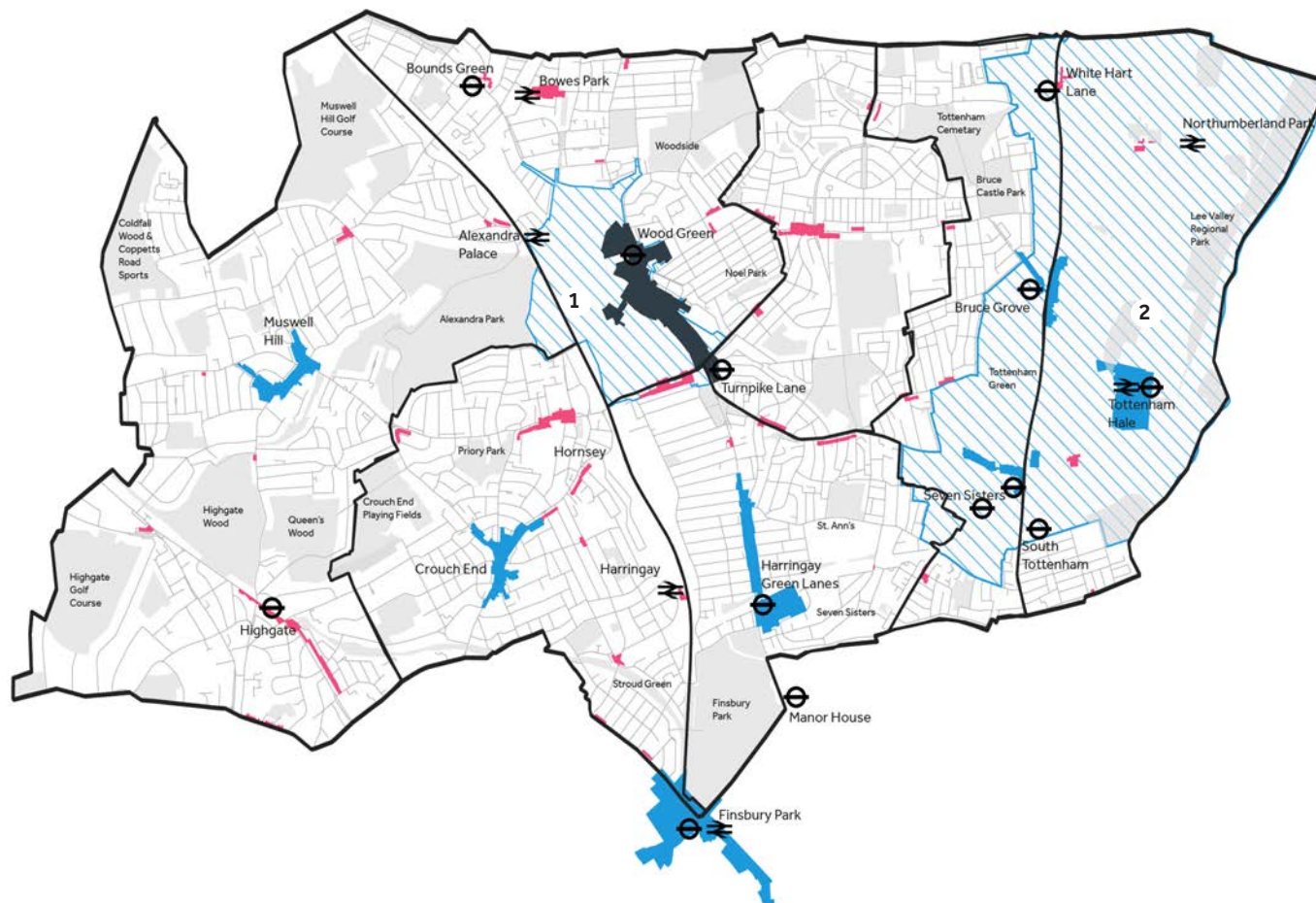
employment space, and attract people from a moderate distance. Some of them have developed specialist shopping functions, such as Green Lanes which has a unique Turkish food offering.

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.

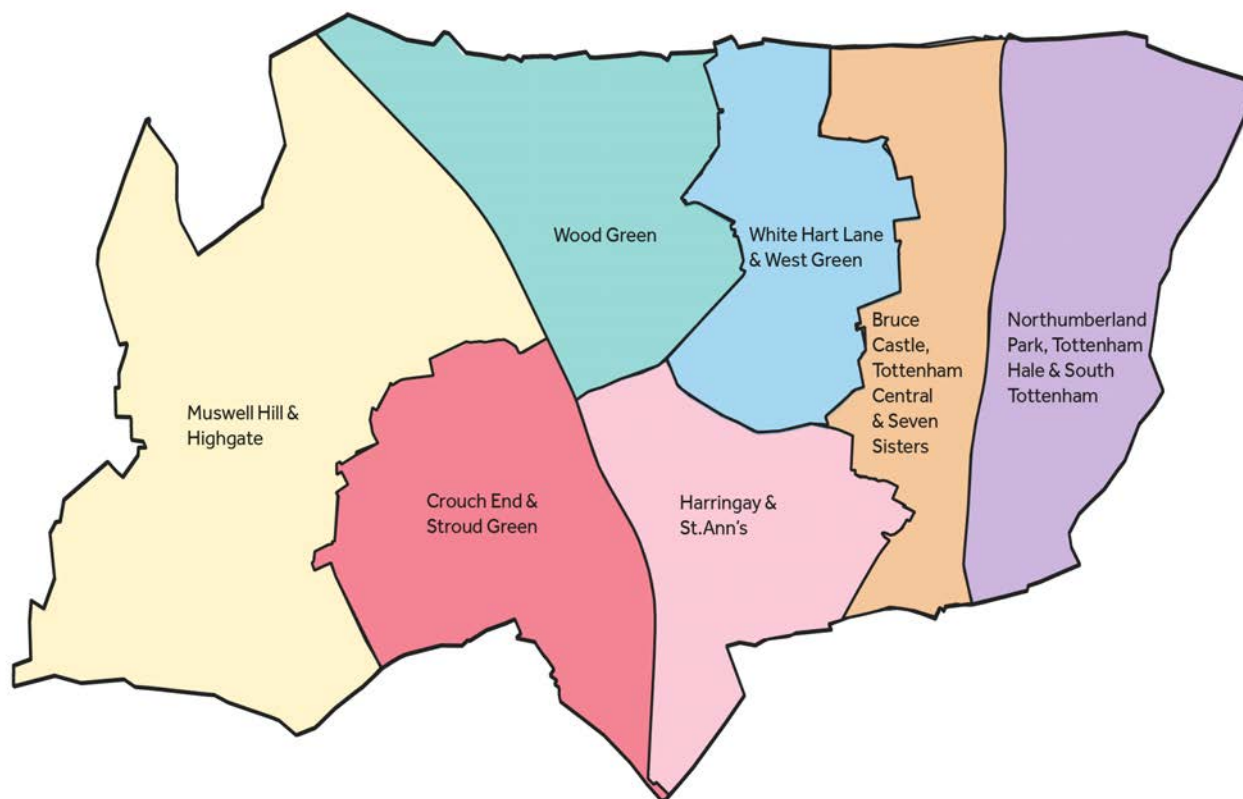
What do you think?

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

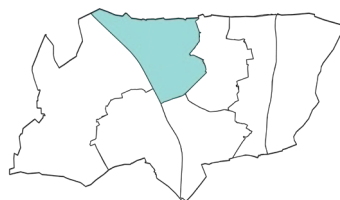
-  Statutory Listed Buildings
-  Conservation Areas

Employment Land

-  Local Employment Land (DM37)
-  Local Employment 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

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

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

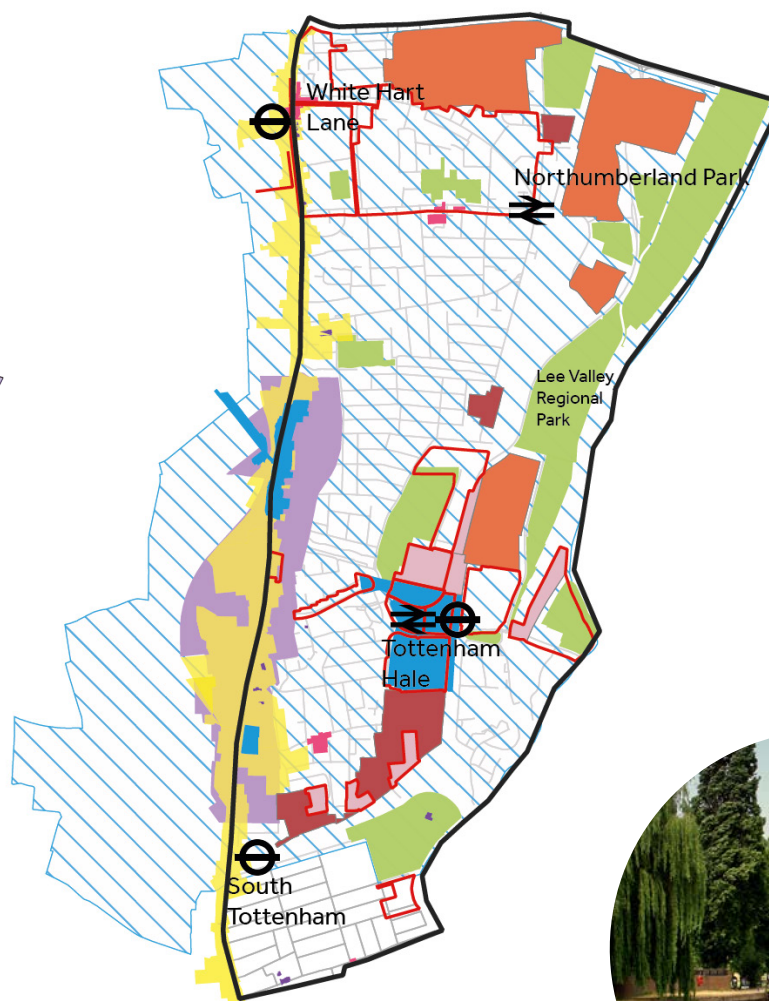
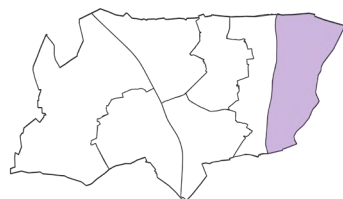
- Statutory Listed Buildings
- Conservation Areas

Employment Land

- Strategic Industrial Land
- Locally Significant Employment Site (LSIS)
- Local Employment Land (DM37)
- Local Employment 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

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

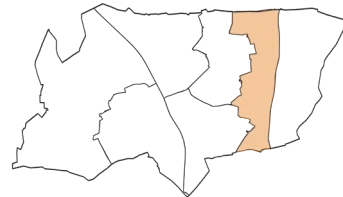
- Statutory Listed Buildings
- Conservation Areas

Employment Land

- Strategic Industrial Land
- Locally Significant Employment Site (LSIS)
- Local Employment Land (DM37)
- Local Employment 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

Key Characteristics

This area contains a large proportion of built heritage in the east of the borough, including local landmarks such as 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

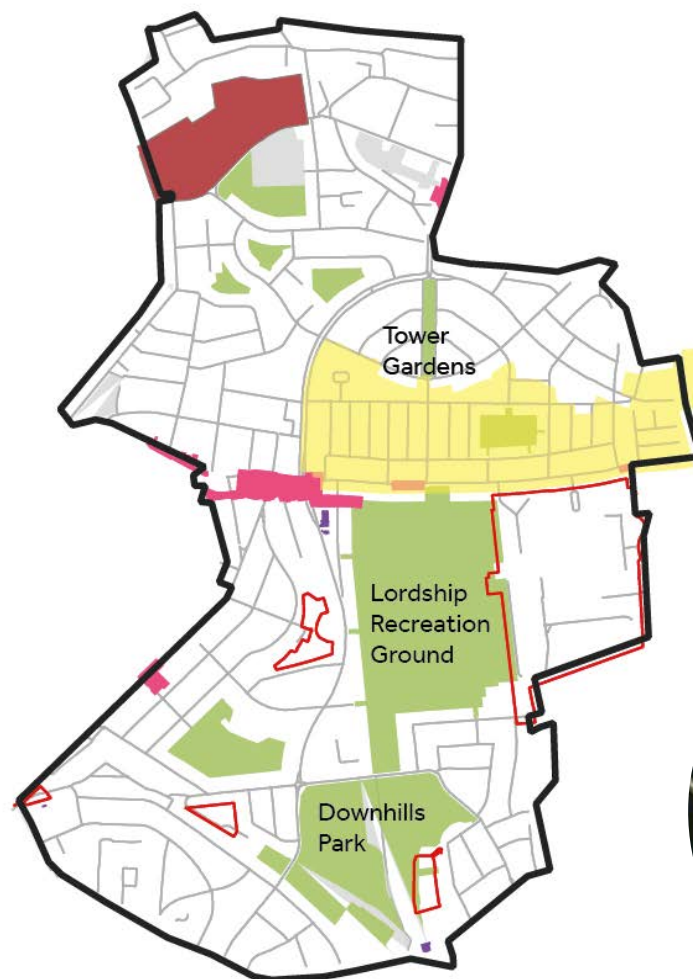
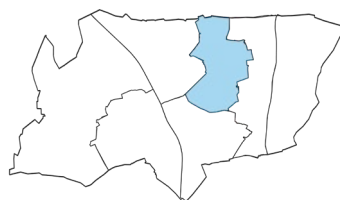
- Statutory Listed Buildings
- Conservation Areas

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

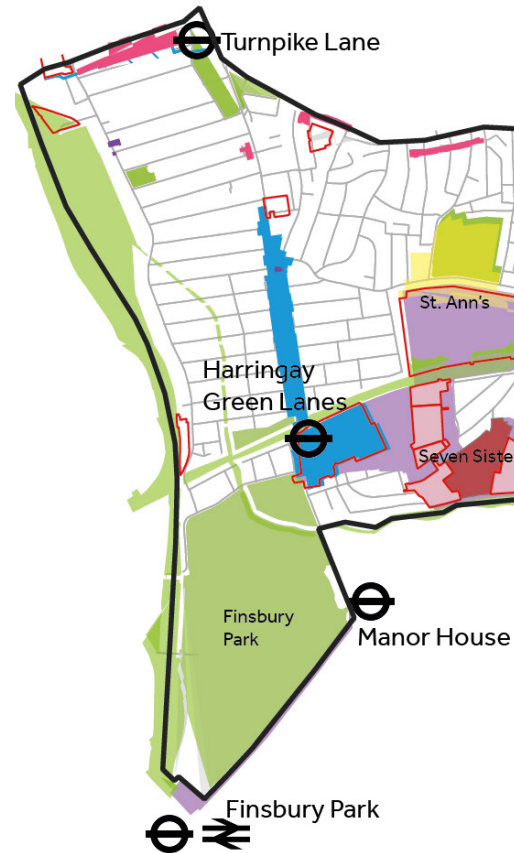
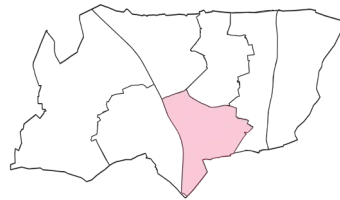
- Statutory Listed Buildings
- Conservation Areas

Employment Land

- Locally Significant Employment Site (LSIS)
- Local Employment Area - Regeneration (DM37)

Other

- Green space



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

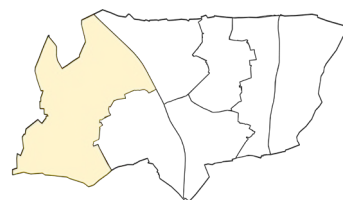
- Statutory Listed Buildings
- Conservation Areas

Employment Land

- Locally Significant Employment Site (LSIS)
- Local Employment 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.

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

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

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

- District centre
- Local shopping centre
- Site Allocation

Heritage and Conservation

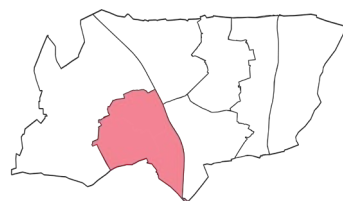
- Statutory Listed Buildings
- Conservation Areas

Employment Land

- Locally Significant Employment Site (LSIS)
- Local Employment 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.

Plevna



Partridge Way



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.

Highpoint 2, Highgate



Leasie Avenue, Muswell Hill



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.

Welbourne



White Hart Lane





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.



Lorenzo House

Lorenzo 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 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

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

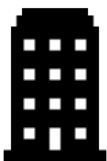


The existing Local Plan does not contain any specific policies on Build to Rent. However, the Haringey Housing Strategy 2017-2022 recognises that a reasonable supply of good quality housing for private rent, especially for families, is vital to meeting the needs of local households who cannot access 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 it 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.

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.

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.



5.2.1. Social infrastructure

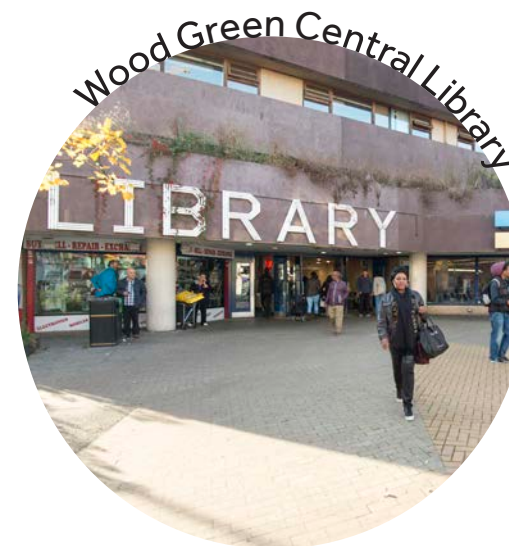
What should the New Local Plan do?



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.

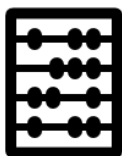
The New Local Plan should support provision of fully accessible facilities and services. This is both a function of where they are located and how easy they are to access including ability to walk, cycle or get public transport to them and their accessibility to people of all ages and abilities.



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, Haringey, 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.



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.

Woodside Square



Blue House Yard



Channing School Performing Arts Building



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.



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



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



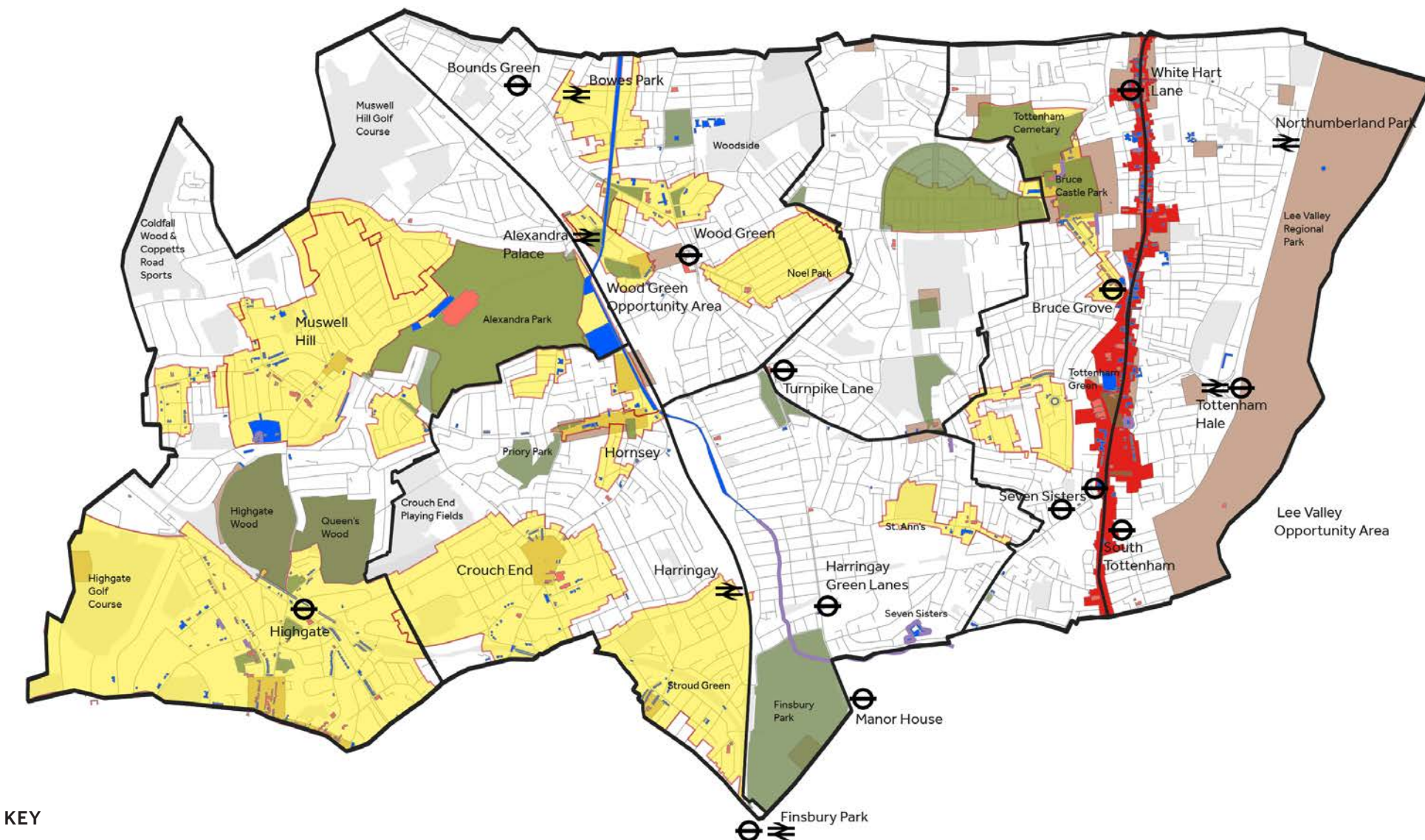
Our Wealth of Heritage Assets

- 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



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.





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.



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 | ■ | Significant Open Land |
| ■ | Local Nature Reserve | ■ | Metropolitan Open Land |
| ■ | Lee Valley Regional Park | ■ | Green Belt |
| ■ | Ecological Corridor | | |
| ■ | Public Green Spaces | ■ | Other |
| ■ | Green Spaces | — | 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 (NO2) 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

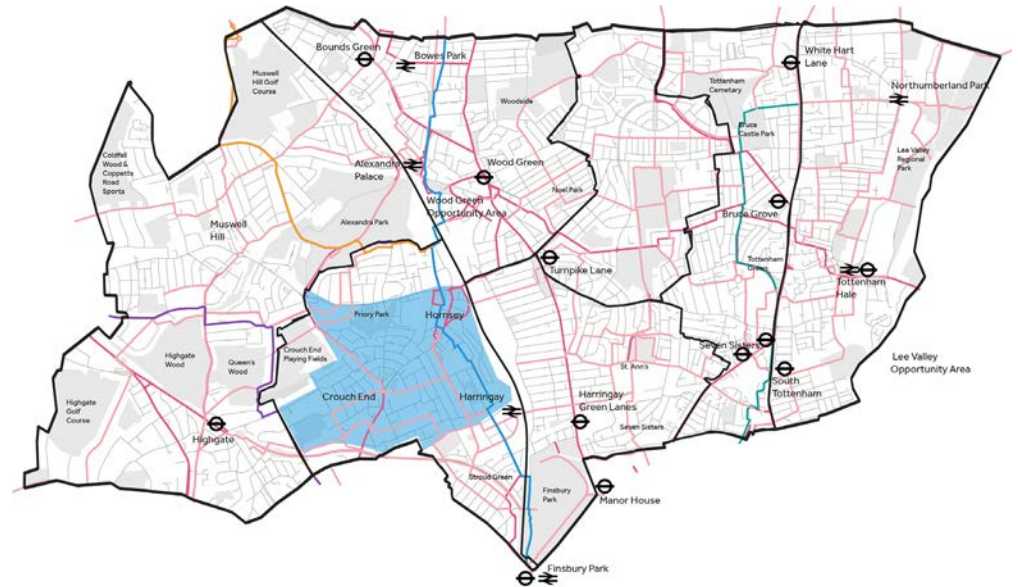
- Victoria line
- Northern line
- Overground line

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 Superhighway (CS1)
- Cycle Lanes
- National Cycle Strategy

Other

- Crouch End Liveable Neighbourhood



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.



River Park House



Workspace

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.

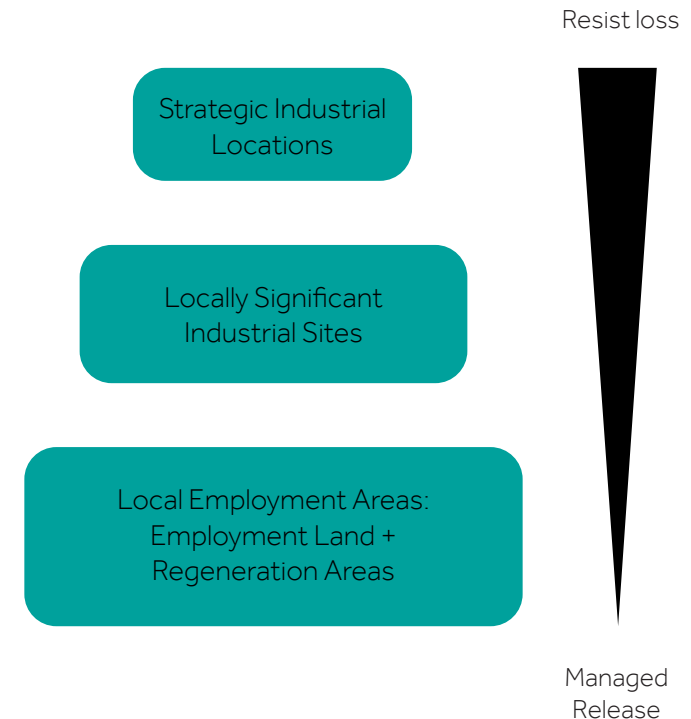
In London, types of industrial and employment land are categorised in order of importance. Strategic Industrial Locations (SIL) sit at the top of this hierarchy and are London's main reservoir of land for industrial, logistics and related uses. These areas are considered critical to the effective functioning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

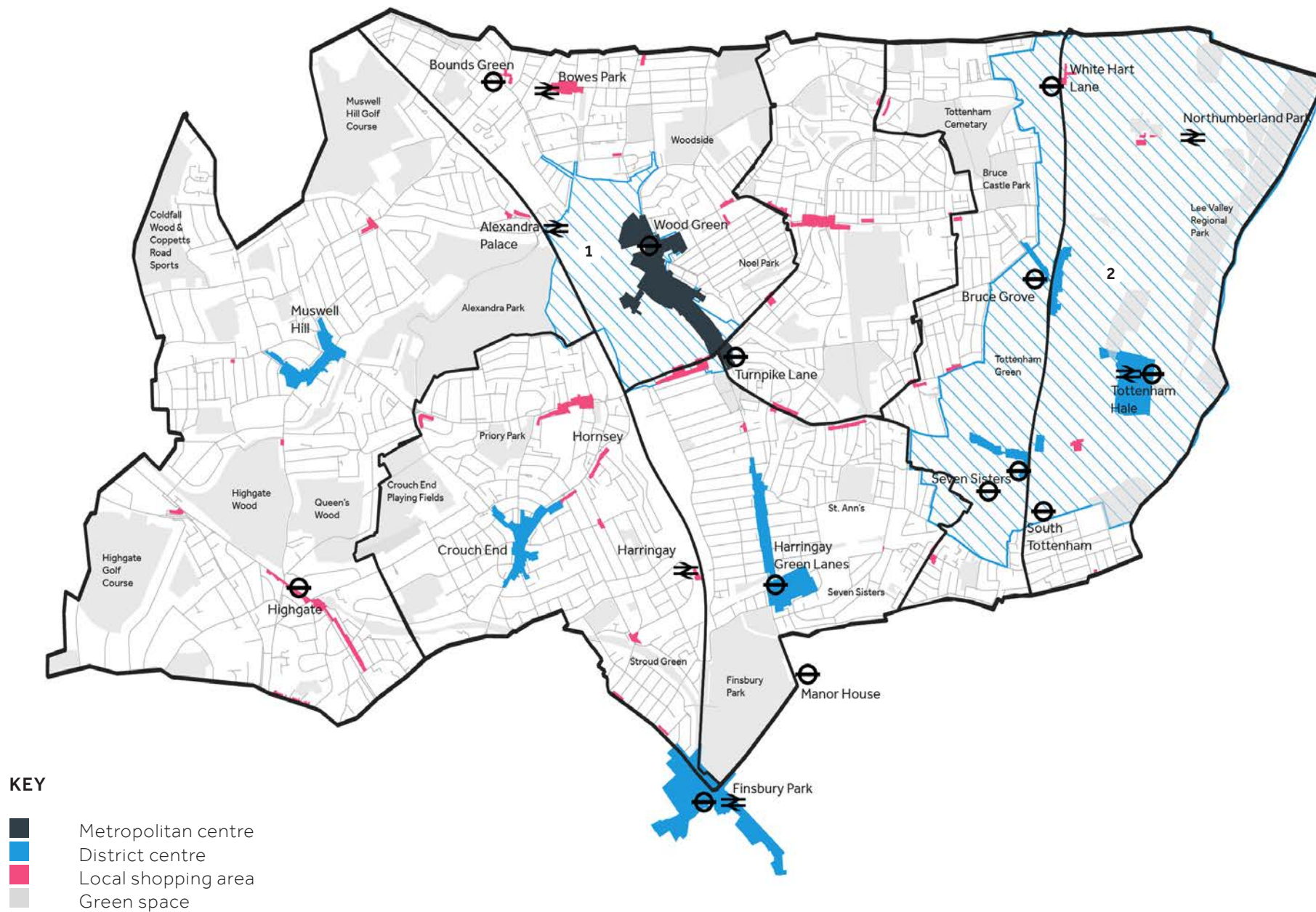
With regards to primary retail frontages, with the exception of Wood Green, most centres are at or just above this threshold.

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.





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?

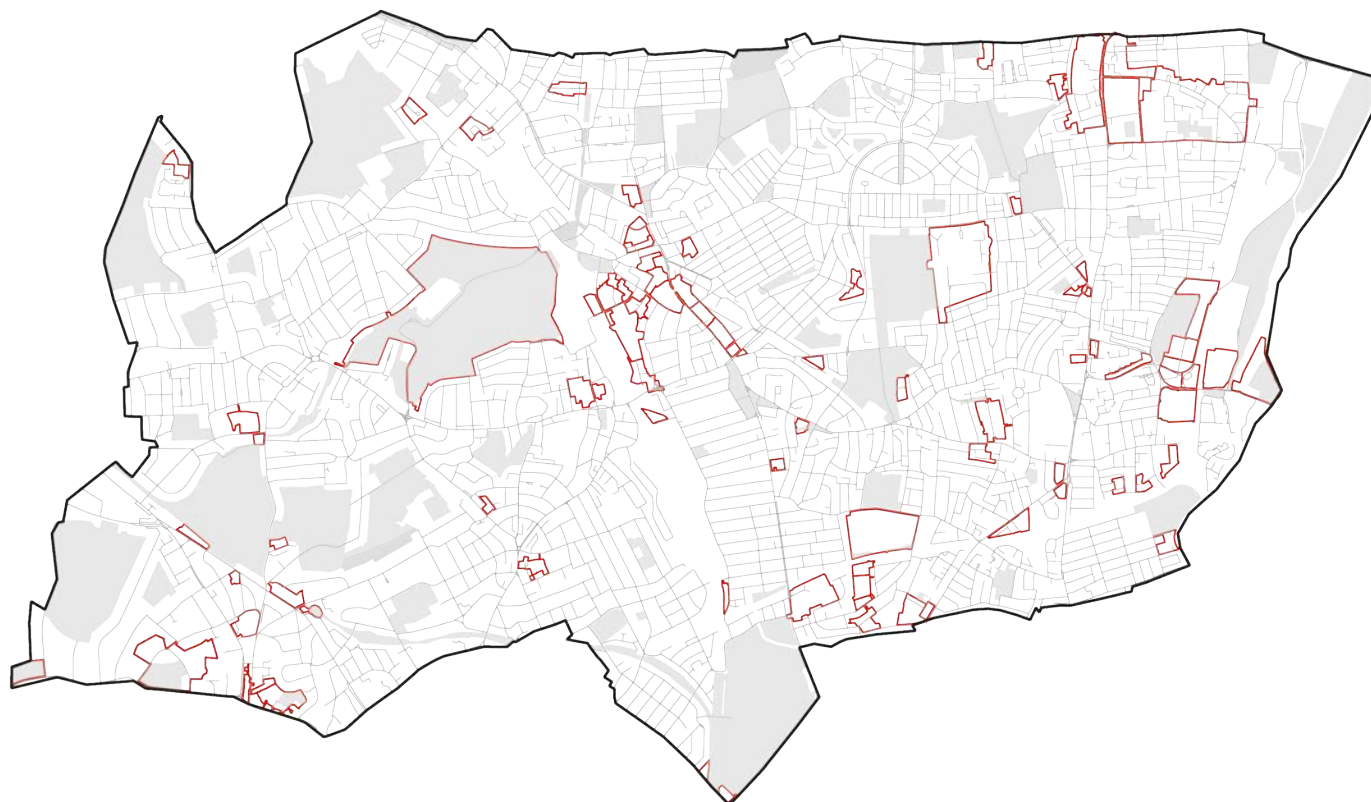
CS1. Do you consider there are any key barriers to delivery of new development in the borough, such as infrastructure constraints? And if yes, do these affect particular types of development, such as small sites or large small sites?

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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APPENDIX B

Integrated Impact Assessment – Draft Scoping Report

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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 Directive 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.

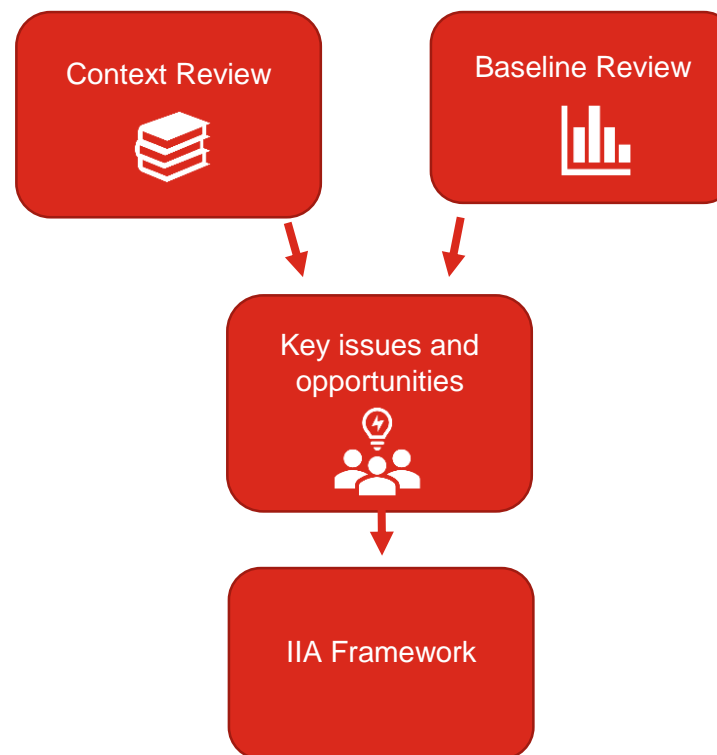
1.2 Purpose of the Scoping Report

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**

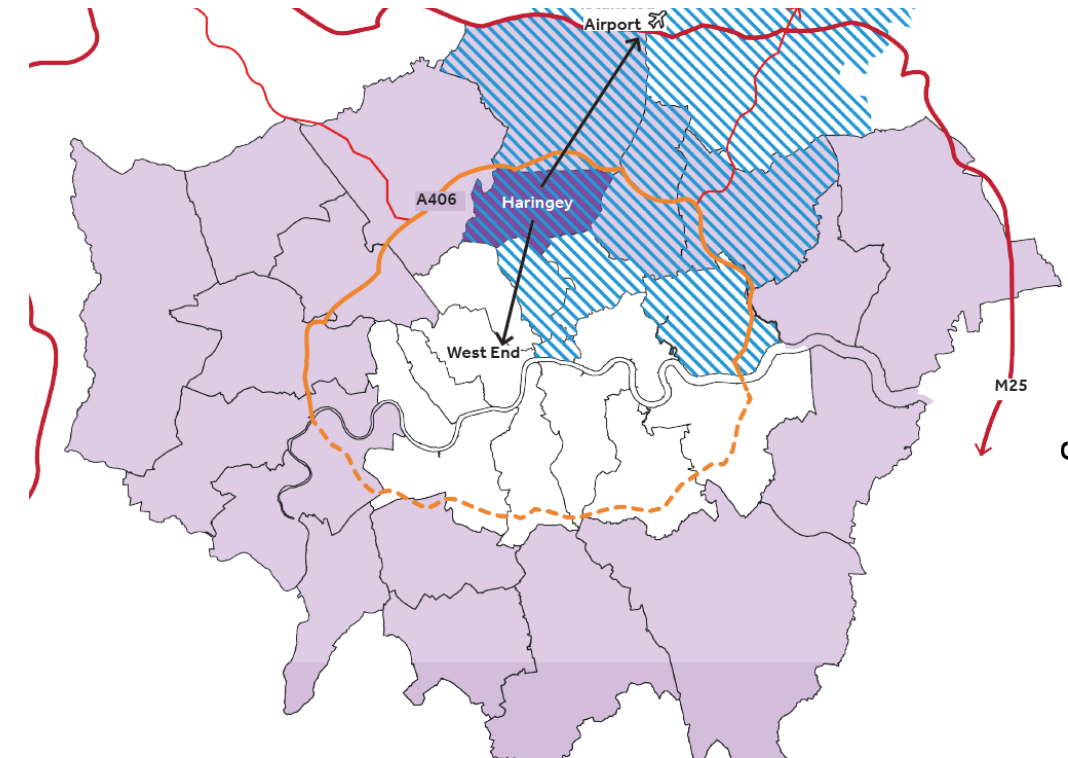
2. Borough Context

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



KEY



Outer London

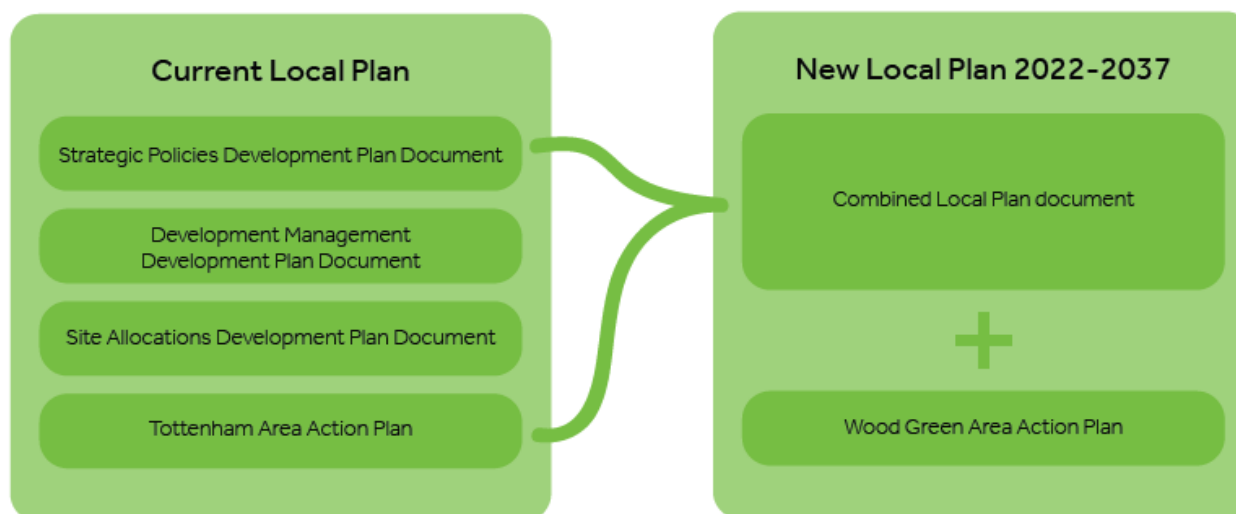


London-Stansted-Cambridge Consortium Area

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.

Figure 2: New Local Plan structure



Haringey's Development Plan includes:

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

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

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 2011¹

¹ GLA's housing-led population projections

² ONS Annual Population Survey, 2013-15

- 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 country²
- 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 England³
- 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 country⁴. 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 London⁵

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 impairment⁶
- 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%).

⁶ ONS Census 2011??

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 meetings⁷. 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.

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 growing 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 prior⁹.

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

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

- 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.

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 need¹⁰. 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 Hale¹¹.

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

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 Learning Survey 2019¹² 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,

¹² <https://learningandwork.org.uk/wp-content/uploads/2020/04/Adult-Participation-in-Learning-Survey-2019.pdf>

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.

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 organic 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 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 (PM₁₀, PM_{2.5} and black carbon) and nitrogen dioxide (NO₂).

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 NO₂ 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 PM_{2.5} 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 (NO₂; annual mean objective) and Particulate Matter (PM₁₀; 24-Hour mean objective). For PM₁₀, air quality objectives are now largely being achieved, but there are still widespread exceedances of NO₂, 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-](https://www.haringey.gov.uk/local-democracy/policies-and-strategies/building-stronger-haringey-together/priority-3-clean-and-safe/place-strategies-and-policies)

[strategies/building-stronger-haringey-together/priority-3-clean-and-safe/place-strategies-and-policies](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 NO₂ concentrations at the Roadside site have been trending downwards since 2014, with the 2018 results of 39µg/m³ just below the annual objective of less than 40µg/m³. Levels at the background site, meanwhile have been well below the annual objective, hovering at around 25µg/m³ since 2013¹⁶.

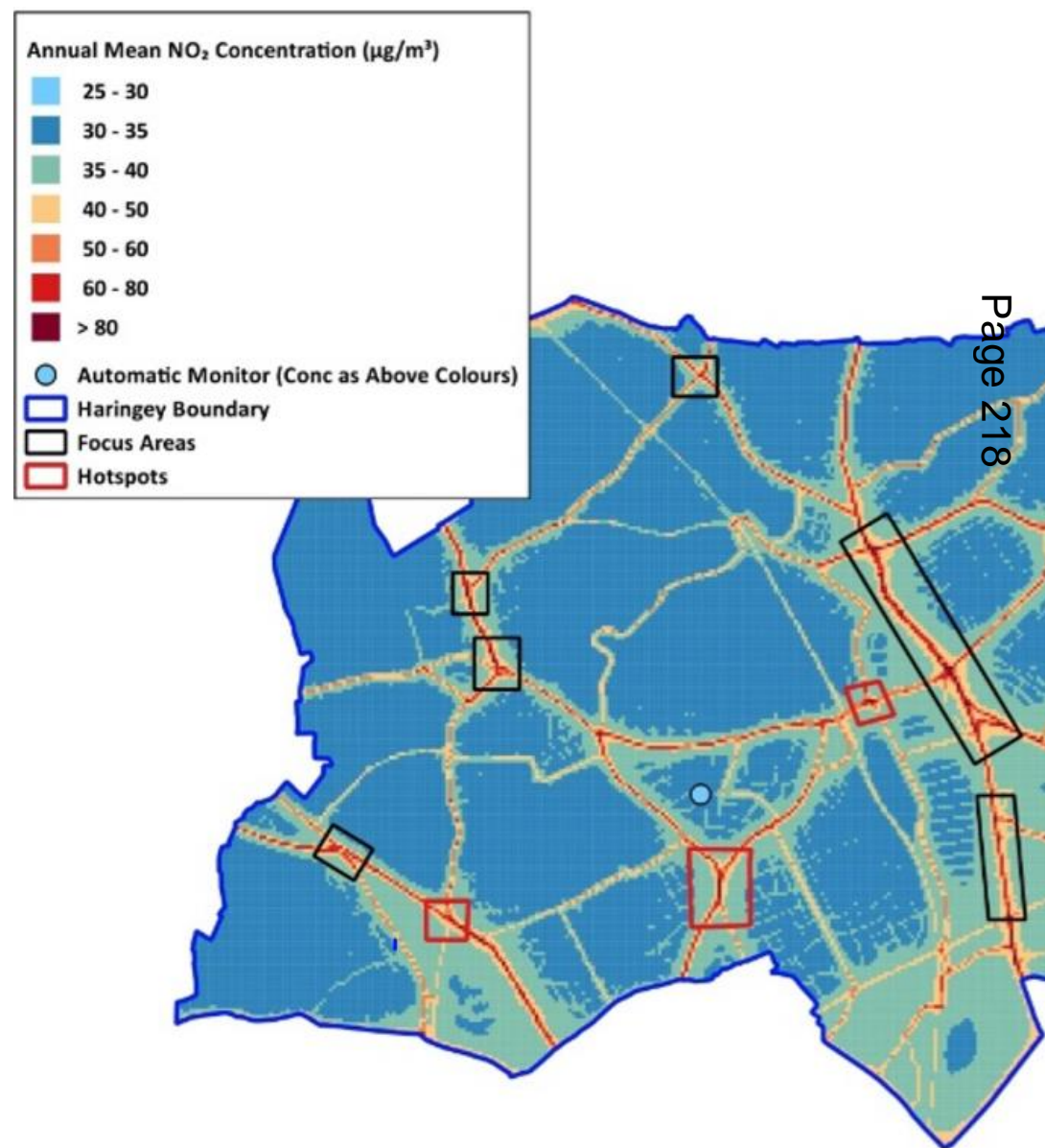
Haringey also operates 15 non-automatic monitoring sites for Annual Mean NO₂ concentrations, including at vulnerable locations such as schools and GP surgeries. These have largely remained at steady levels or slightly decreasing since 2014. In 2018, three of roadside sites had annual concentrations in excess of the objective¹⁷.

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.

¹⁶ Haringey Council (2019) Air Quality Report 2018 [Online] available at <https://www.haringey.gov.uk/business/licensing-and->

Figure 3 Modelled map of annual mean NO₂ concentrations including monitoring locations and Air Quality



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 disproportionately 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 dementia¹⁸.

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 NO₂ 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.

¹⁹ [Insert reference]

²⁰ [Insert reference]

²¹ CCC (2012), 'How local authorities can reduce emissions and manage climate risks [Online], available from:

In addition, the government has set out further planning practice guidance on climate change and renewable and low carbon energy¹⁹.

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

<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 CO₂ 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 2.5tCO₂capita. Its per capita figure is considerably lower than Greater London, at 3.3 tCO₂capita, and the UK, at 4.5 tCO₂capita²⁴.

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

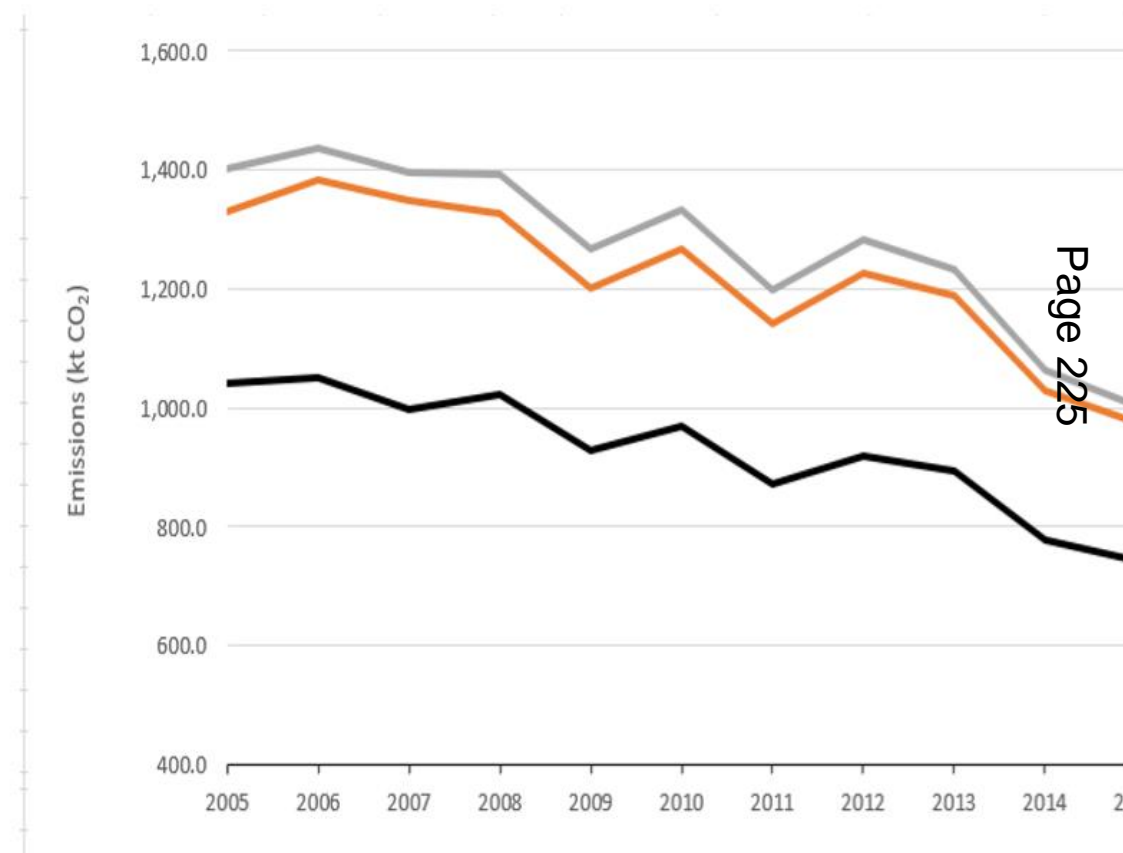


Figure 5 Comparison of energy demand between high uptake and low uptake of energy

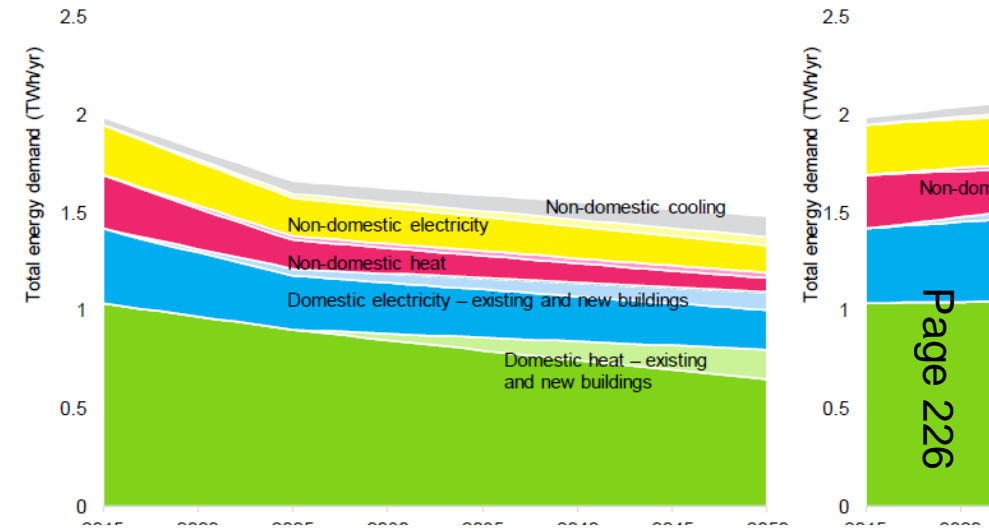
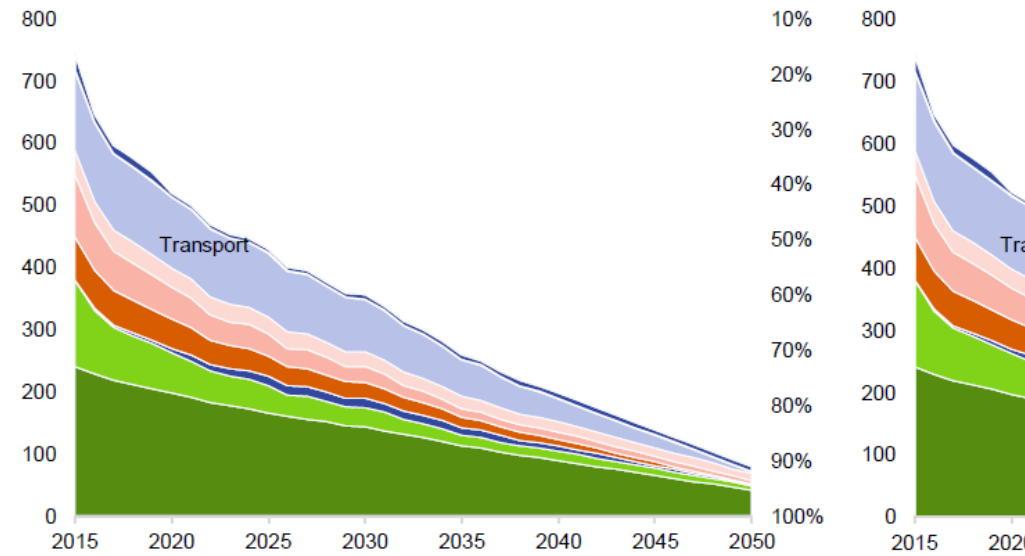


Figure 6 Comparison of carbon emission reduction in the transport sector between "near zero" and "high" uptake of energy



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 an 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.

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>

For both the 2012 and the 2017 UK Climate Change Risk Assessment, the Adaptation Sub-Committee commissioned an evidence report²⁵ 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

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 accordance 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 incorporation 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 an 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/201050209c7a4658a1c2265aa44113>
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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 scale 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 east of the borough there is limited access to open space and recreational grounds including play space.

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

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

Projections

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

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

On the plus side, the increased scale of development could fund strategic investment in green infrastructure (including the

Green Grid) to help create a resilient network of green corridors and improve open space. This would lead to positive effects compared to the baseline, particularly when focused in the east of the borough.

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

Health and Equalities Impacts



Environmental quality is an important issue, recognising that the environmental quality of neighbourhoods makes a major contribution to people's quality of life, and a poor quality environment can impact more severely on those with protected characteristics (e.g. vulnerable people, including children, older people and those with existing health conditions, may be restricted in their activities due to poor air quality or access to open space). Environmental issues are more concentrated in certain parts of the borough and whilst open space is fairly evenly distributed across the borough, there is a lack of access in certain parts of the east, including to play space and allotment which can have impacts on health.

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

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

Issues, Opportunities and Objectives



The following key issues 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. It 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 heights 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

- 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

4.11 Noise Pollution

Context



National

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

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 Watermead 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

²⁹ European Commission Circular Economy Package
<http://ec.europa.eu/environment/circulareconomy/>

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 Package²⁹ which includes a 65% recycling target for municipal waste by 2030. The UK has signed up to delivering these as part of Brexit.

Regional

The main messages from the **London Plan** include:

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

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-year 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 0.25 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 which 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 or 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 Council 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 Supported Housing Review.
- Housing disadvantage is a key issue affecting the health and wellbeing of residents

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

- 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 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 employment³¹.

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 were generally lower than the national average of 10%.

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

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

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

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

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

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

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

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

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

Based on Haringey's current unemployment rate, a higher proportion of unemployed residents use the town centre

compared to those in employment. Only 62% of those surveyed are in employment, compared to 74% amongst Haringey's residents (Annual Population Survey, ONS, 2018).

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

Figure 8 Summary Table of High Street Performance

Summary Table of High Street Performance

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

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



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 difference 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

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;

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.

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

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

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

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

| Significance of effect | | Description of effect |
|------------------------|----------------------|--|
| ++ | Significant positive | Likely to benefit a large area of Haringey and wider area, or a large number of people and receptors. The effects are likely to be direct and permanent and the magnitude will be major. |
| + | Minor positive | The extent of predicted beneficial effects is likely to be limited to small areas within Haringey or small groups of people and receptors. The effects can be direct or indirect, temporary or reversible. The magnitude of the predicted effects will be minor. |
| 0 | 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 | <p>Address the diverse needs of Haringey's current and future population</p> <p>Ensure equal access to environmental, social and physical infrastructure</p> |

| | | |
|---|---|---|
| Social Integration and Inclusion | <p>Provision of social infrastructure in appropriate, accessible locations</p> <p>Support strategic improvements to areas with highest deprivation</p> <p>Reduce crime and improve perceptions of safety</p> | <p>Promote social interaction in a way that fosters a culture of equality, fairness and respect</p> <p>Improve safety and address fear of crime to help remove barriers to activities leading to reduced social isolation, particularly in areas of higher deprivation</p> |
| Health | <p>Contribute to the physical and mental health and wellbeing of residents</p> <p>Address the social determinants of health including housing, environment, and economic</p> <p>Improve quality of, and access to, health facilities</p> <p>Support the provision of quality, affordable and healthy food</p> | <p>Promote improvements in physical and mental health, particularly in areas of health and social deprivation</p> <p>Reduce differentials in life expectancy and healthy life expectancy across the borough</p> <p>Improve access to health and social care services and facilities, particularly in areas of deficiency such as the centre and east of the borough</p> |
| Education | <p>Improve quality of, and access to, education and training facilities</p> | <p>Improve inclusivity and accessibility of education and training facilities, particularly in areas where the need is greatest</p> |
| Place | | |
| Air Quality | <p>Reduce emissions and concentrations of harmful atmospheric pollutants</p> <p>Deliver development that does not expose current and future residents to poor air quality</p> | <p>Reduce inequal access to clean air</p> |

| | | |
|-----------------------------------|--|---|
| 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 | Contribute to increased supply of genuinely affordable homes |
| | An increased supply of affordable homes, particularly low-cost rented 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 |
| | Delivery of a suitable housing mix to meets local need | |
| | High-quality, inclusive adequately sized homes | Ensure that new homes are of a high quality and a suitable size and support health and well being |
| | A full range of housing types to meet local need, including specialist needs | Ensure that new homes are inclusive and accessible |
| | Homes in good locations with access to services, facilities and amenities | Ensure that new homes are served by appropriate infrastructure and located well in relation to key amenities such as public open space and other services and facilities |
| Economy | | |
| Economy and Employment | Support a strong, diverse and resilient economy | Provide employment opportunities in the most deprived areas, particularly to disadvantaged groups, and stimulate regeneration |
| | 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 | Improve equality of access to jobs and training opportunities |
| | Enable the delivery of affordable business premises | Enable disadvantaged people to obtain employment or upgrade their skills and workplace experience |

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|--------------|---|--|
| Town Centres | Enhance the vitality and vibrancy of the borough's town and local centres | Create inclusive, safe and accessible spaces for everyone in the community |
| | Enhance the environment of the borough's town and local centres | Create healthy environments by promoting active travel and avoiding the proliferation and clustering of uses which are a risk to public health |
| | Support new retail and leisure development within existing centres | |

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 |

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| 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) |

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| 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 |

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| 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 |

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| 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) |

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| 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 Advice 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 |

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| 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's 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) |

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| 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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APPENDIX C

Communications and Engagement Plan

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Communications and Engagement Plan

NEW HARINGEY LOCAL PLAN



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.

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B) Responsible Cabinet Member and Officers

| | | |
|----------------------------|------------------|--|
| Responsible Cabinet Member | Councillor Hearn | Cabinet Member for Climate Change & Sustainability |
| 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**.

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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

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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) | <i>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.</i> | Autumn 2020 | Minimum 8 Weeks |
| Draft Local Plan (Regulation 18) | <i>The Council will consult on a full draft of the Local Plan to consider refined options before the final version is published.</i> | 2021 | Minimum 6 weeks |
| Proposed Submission Local Plan (Regulation | <i>The Council will publish the Local Plan which is followed by a minimum 6 week period of</i> | 2021 | Minimum 6 weeks |

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| 19) | <i>consultation where formal representations can be made to it.</i> | | |
| Submission and Examination (Regulations 22-25) | <i>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.</i> | 2021/22 | TBD |
| Adoption (Regulation 26) | <i>The Council will adopt the Local Plan following consideration of the Inspector's recommendations.</i> | 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

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2020) – New Haringey Local Plan

- 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:

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- 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 | <p>A. Use of the representative Citizens Panel</p> <p>Develop new approaches to target groups that we may not be reaching through traditional consultation methods:</p> <ul style="list-style-type: none"> 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 <p>Work with other Council departments to ensure the views of local businesses are obtained.</p> <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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. |

Communications and Engagement Plan (September 2020) – New Haringey Local Plan

| 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: <ul style="list-style-type: none"> - 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 LGBTQ+ Network and local, regional and national groups like Wise Thoughts, Embrace UK and LGBTQ+ 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 |

Communications and Engagement Plan (September 2020) – New Haringey Local Plan

| 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. |

Draft Communications and Engagement Plan (August 2020) – New Haringey Local Plan

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 |

Draft Communications and Engagement Plan (August 2020) – New Haringey Local Plan

| | | | |
|----|--|---|--|
| | | 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

Draft Communications and Engagement Plan (August 2020) – New Haringey Local Plan

- 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 an 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 |

**Draft Communications and Engagement Plan (August
2020) – New Haringey Local Plan**

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| | feedback of representative groups |
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Report for: Regulatory Committee - 5 October 2020

Title: Recent Government Announcements on Planning

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

Lead Officer: Bryce Tudball, Planning Policy Team Manager

Ward(s) affected: N/A

Report for Key/Non Key Decision: For information

1. Describe the issue under consideration

- 1.1 On 6 August 2020 the Government launched two consultations on the English Planning System. The first is titled “Changes to the current planning system” and sets out proposals for measures to improve the effectiveness of the current planning system. The second is the long-awaited Planning White Paper titled: “Planning for the Future” which sets out the Government’s intentions and proposals for long-term reform of the planning system in England.
- 1.2 This report provides information on the content of both consultations, sets out the Council’s response to the Changes to the current planning system (which was submitted in advance of the closing date of 1 October 2020), and invites comment on the Council’s draft response to the Planning for the Future White Paper which must be submitted by 29 October 2020.

2. Recommendations

That Regulatory Committee:

- A) Note and discuss the response to the Changes to the current planning system consultation which was submitted on 1 October 2020.
- B) Comment on the draft response to the Planning for the Future White Paper ahead of its submission by 29 October 2020.

3. Reasons for decision

Not applicable.

4. Alternative options considered

The Council could choose not to respond to the consultations but this is not considered appropriate as it would not ensure the Council’s concerns about some of the proposals are formally on record as part of the Government consultations.

5. Recent Government Announcements on Planning

Changes to the Current Planning System

5.1 The Changes to the Current Planning System consultation set out proposals for measures to improve the effectiveness of the current planning system. The four main proposals are:

- changes to the standard method for assessing local housing need
- securing of First Homes through developer contributions in the short term until the transition to a new system
- supporting small and medium-sized builders by temporarily lifting the small sites threshold below which developers do not need to contribute to affordable housing
- extending the current Permission in Principle to major development

5.2 The consultation closed on 1 October 2020. The Council submitted a response by email on 1 October 2020. Key messages in the responses were that the Council:

- Seeks assurances that London boroughs should continue to plan for housing on the basis of the London Plan housing targets rather than Government's standard methodology for calculating housing need and that the Government will continue to permit alternative approaches to assessing housing need, where justified;
- Maintains its opposition to the Government's First Homes scheme as this will have a detrimental effect on the delivery of other affordable housing tenures, particularly low-cost rented homes;
- Opposes the Government's proposed approach of setting out in policy that a minimum of 25 per cent of all affordable housing units secured through developer contributions should be First Homes. This is a blunt and 'one size fits all' approach to delivering so-called 'affordable housing' which is not appropriate for the varying circumstances of each local authority. Local authorities are best placed to plan for new affordable housing in their areas to best meet local need;
- Opposes the Government's proposal to temporarily raise the affordable housing threshold from 10 homes to either 40 or 50 homes. The major effect of this will be to considerably reduce the delivery of much needed affordable housing;
- Does not support major development being allowed through the new route of 'Permission in Principle' (PIP) consents rather than the normal planning permission route. The expansion of PIP to cover 150 dwellings or 5 hectares would mean PIP could be sought on larger, more significant and more complex sites which are not suitable for determination via this route (absent of key technical information).

5.3 A copy of the response is provided at Appendix A.

Planning for the Future: White Paper

5.4 The Planning for the Future White Paper sets out the Government's intentions and proposals for long-term reform of the planning system in England. The consultation is wide-ranging covering Local Plans, planning decisions and to a lesser extent implementation and enforcement. The table below sets out the 24 main proposals:

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|------------|---|
| Proposal 1 | The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – <i>Growth</i> areas suitable for |
|------------|---|

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| | substantial development, <i>Renewal</i> areas suitable for development, and areas that are Protected. |
| Proposal 2 | Development management policies established at national scale and an altered role for Local Plans. |
| Proposal 3 | Local Plans should be subject to a single statutory “sustainable development” test, replacing the existing tests of soundness. |
| Proposal 4 | A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met. |
| Proposal 5 | Areas identified as <i>Growth</i> areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building. |
| Proposal 6 | Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology |
| Proposal 7 | Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template |
| Proposal 8 | Local authorities and the Planning Inspectorate will be required through legislation to meet a statutory timetable for key stages of the process, and consideration will be given to what sanctions there would be for those who fail to do so |
| Proposal 9 | Neighbourhood Plans should be retained as an important means of community input, and communities will be given support to make better use of digital tools |
| Proposal 10 | A stronger emphasis on build out through planning |
| Proposal 11 | Expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development. |
| Proposal 12 | Set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making. |
| Proposal 13 | Consider how Homes England’s strategic objectives can give greater emphasis to delivering beautiful places. |
| Proposal 14 | Introduce a fast-track for beauty to incentivise and accelerate high quality development which reflects local character and preferences. |
| Proposal 15 | Amend the National Planning Policy Framework to ensure that it can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits. |
| Proposal 16 | A quicker, simpler framework for assessing environmental impacts and enhancement opportunities, that speeds up the process while protecting and enhancing the most valuable and important habitats and species in England |
| Proposal 17 | Conserving and enhancing historic buildings and areas in the 21st century |
| Proposal 18 | Ambitious improvements in the energy efficiency standards for buildings to help deliver a world-leading commitment to net-zero by 2050. |
| Proposal 19 | The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally-set rate or rates and the current system of planning obligations abolished |

| | |
|-------------|--|
| Proposal 20 | The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights |
| Proposal 21 | The reformed Infrastructure Levy should deliver affordable housing provision |
| Proposal 22 | More freedom could be given to local authorities over how they spend the Infrastructure Levy |
| Proposal 23 | Develop a comprehensive resources and skills strategy for the planning sector to support the implementation of the reforms |
| Proposal 24 | Strengthen enforcement powers and sanctions |

5.5 The Council's draft response to the consultation is provided at Appendix B. The final response must be submitted by 29 October 2020. The key messages in the draft response include the following:

- Local Planning Authorities (LPAs) are already under considerable resource pressure with the current system and fee set-up. Introducing a new 'zoning' style system in parallel with the existing system will add significant strain on resources and provide a confusing system for residents
- The reforms will require LPAs to front-load resource to support the production of Local Plans. There will need to be extra resource to deliver the Local Plans envisaged by the White Paper and skills building will also be required to facilitate this.
- There is a risk that the proposals for more streamlined planning decisions could undermine the important democratic role of the planning system, either via public consultation or via Planning Committees – democratic input is crucial to gain communities' trust in the planning system, and also to deliver better development on the ground
- The White Paper aims to deliver net-zero greenhouse emissions by 2050. This needs to be more ambitious and happen sooner. This would be a backwards step for the Council which seeks to achieve a net-zero borough by 2041
- The Council is concerned about the proposals for a reformed 'Infrastructure Levy'. The Council is also concerned about the potential consequences for affordable housing delivery if future provision is to be secured through the levy rather than through planning obligations. It is unclear too what will happen to other non-financial obligations which are covered by Section 106 agreements such as off-site carbon offsets, employment and skills training and off-site provision of play space.
- Oppose automatic refunds or rebates of planning fees, and oppose deemed planning permission beyond certain time limits
- Support greater use of digital technology in plan-making and decision-taking, but this needs financial support and leadership from Government
- The Government will need to consult on more details in due course, with relevant parliamentary scrutiny of any new primary or secondary legislation. There will need to be a lengthy transition period to minimise disruption.

6. Contribution to strategic outcomes

6.1 Changes to the planning system are relevant to all Priorities of the Borough Plan.

7. Use of Appendices

- Appendix A: Changes to the Current Planning System consultation response
- Appendix B: Planning for the Future White Paper draft consultation response

8. Background documents

- Changes to the current planning system consultation document:
<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system>
- Planning for the Future White Paper:
<https://www.gov.uk/government/consultations/planning-for-the-future>

9. Local Government (Access to Information) Act 1985

N/A

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COUNCIL RESPONSE TO GOVERNMENT CONSULTATION ON CHANGES TO THE CURRENT PLANNING SYSTEM**SEPTEMBER 2020**

**Changes to the Current Planning System Consultation
Ministry of Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF**

Sent by email to technicalplanningconsultation@communities.gov.uk

Consultation on Changes to the Current Planning System

Thank you for the opportunity to respond to the consultation on changes to the current planning system.

Changes to the standard method for assessing housing numbers

Haringey is located within Greater London and is subject to the Mayor of London's statutory spatial development strategy ("the London Plan"). The London Plan assesses housing need for the capital as a whole and then apportions targets based on the capacity of the 32 boroughs to accommodate new homes. In view of the fact this approach to housing need was found sound at examination in 2019, the Council seeks assurances that London boroughs should continue to plan for housing on the basis of the London Plan and also that the Government will continue to permit alternative approaches to assessing housing need, where justified. This will provide certainty for communities, developers and Councils in London, and allow us to continue our ambitious progress on our New Local Plan with a clear housing target

Delivering First Homes

In May 2020 the Council responded to the Government's consultation on the design and delivery of First Homes setting out strong opposition to the proposed scheme.

We note the Government's response to the consultation published on 6 August 2020. This has not satisfactorily taken account of our concerns (shared by many other respondents) that First Homes will have a detrimental effect on the delivery of other affordable housing tenures, particularly low-cost rented homes.

The Council opposes the Government's proposed approach of setting out in policy that a minimum of 25 per cent of all affordable housing units secured through developer contributions should be First Homes. This is a blunt and 'one size fits all' approach to delivering so-called 'affordable housing' which is not appropriate for the varying circumstances of each local authority. Local authorities are best placed to plan for new affordable housing in their areas to best meet local need.

Haringey has one of the highest poverty rates in London, with more than a third of people living in poverty including in-work poverty, and 29% of workers not earning the London Living

Wage of £10.75. This poverty is concentrated in the east of the borough, which has some of the most deprived areas of the country. One fifth of Haringey residents rent from the local authority or housing association with over a third privately renting.

The scheme prioritises state subsidy for 'affordable housing' for home ownership products which will be out of reach for those most in need, rather than prioritising council and social rent products which better meet the needs of local people. The proposed 'First Homes' should not be part of the national definition of 'affordable housing'.

Temporarily raising affordable housing threshold to support small and medium-sized developers

The Council opposes the Government's proposal to temporarily raise the affordable housing threshold from 10 homes to either 40 or 50 homes. The major effect of this will be to considerably reduce the delivery of much needed affordable housing, including the delivery of proposed 'First Homes'. The Government has estimated that the proposal would reduce affordable housing delivery by between 7% and 20%. We consider that this is an underestimate. Since 2016 22% of affordable housing approved in Haringey has been on schemes of 10-49 units.

The Government indicates that the proposal is designed to support SMEs in the medium term during economic recovery from Covid-19 by reducing the burden of contributions for more sites for a time-limited period but has not presented any evidence to indicate that the proposal would support this (nor speed up housing delivery). The Council considers that the proposal could potentially have the opposite effect, and, in any event, the potential benefits are significantly outweighed by major reductions in the delivery of much needed affordable homes.

Extension of Permission in Principle consent regime

The Council does not support major development being allowed through the new route of 'Permission in Principle' (PIP) consents rather than the normal planning permission route. The expansion of PIP to cover 150 dwellings or 5 hectares would mean PIP could be sought on larger, more significant and more complex sites which are not suitable for determination via this route (absent of key technical information).

Please find the Council's responses to the individual questions on the following pages. Whilst the Council opposes the proposals put forward by the Government, we would wish to highlight our commitment to the delivery of housing and can demonstrate a strong track record of working constructively with partners to bring forward high-quality homes in a timely manner.

Please contact Bryce Tudball, Planning Policy Team Manager, should you require further information or clarification.

Yours faithfully

Councillor Kirsten Hearn
Cabinet Member for Climate Change & Sustainability

Changes to the current planning system: Consultation on changes to planning policy and regulations

| Standard methodology for assessing housing numbers in strategic plans | |
|---|--|
| <p>Q1: Do you agree that planning practice guidance should be amended to specify that the appropriate baseline for the standard method is <i>whichever is the higher of</i> the level of 0.5% of housing stock in each local authority area OR the latest household projections averaged over a 10-year period?</p> | <p>The Council does not agree that either approach is a suitable baseline for assessing local housing need in Haringey.</p> <p>Haringey is located within Greater London and is subject to the Mayor of London's statutory spatial development strategy ("the London Plan"). The Mayor's draft new London Plan was subject to examination in 2019. The Inspectors issued their report and recommendations on 8 October 2019 concluding that, subject to limited changes, it provides an appropriate basis for the strategic planning of Greater London. The Mayor considered the Inspectors' recommendations and, on the 9th December 2019, issued to the Secretary of State his Intend to Publish London Plan.</p> <p>The Intend to Publish London Plan sets out a need for 66,000 additional homes per year in London from 2016 to 2041. This is not based on the Government's standard methodology rather it is based on the findings of the 2017 London Strategic Housing Market Assessment (SHMA). The Inspectors noted that the SHMA does not follow the guidance in the PPG on assessing objectively assessed need. However, they noted that establishing future need for housing is not an exact science and the PPG acknowledges that no single approach will provide a definitive answer. The Inspectors concluded in para 133 of their report that the need for 66,000 additional homes per year identified by the SHMA is justified and has been properly calculated for market and affordable housing having regard to national policy and guidance.</p> <p>The Intend to Publish London Plan 2019 sets ten-year targets for net housing completions that each London borough should plan for using a capacity-based methodology. For the purposes of the London Plan, London is considered as a single housing market area. The supporting text of the London Plan sets out the advantage of planning strategically in that it allows London to focus development in the most sustainable locations, allowing all of London's land use needs to be planned for with an understanding of how best to deliver them across the capital. Because of London's ability to plan strategically, boroughs are not required to carry out their own housing</p> |

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| | <p>needs assessment but must plan for, and seek to deliver, the housing targets in the London Plan.</p> <p>The Council notes the proposed changes to the standard method for assessing housing numbers. These would result in a huge jump in London's housing need to a minimum of 93,000 homes per annum (versus 66,000 per annum in the Intend to Publish London Plan 2019). The proposed new standard method would produce an annual requirement for Haringey of 2,786 homes compared to 2,103 under the current standard method and the 1,592 capacity-based target in the Intend to Publish London Plan 2019. Such an increase is highly unlikely to be deliverable in the borough. In view of the fact the Mayor of London's approach was found sound at examination in 2019, the Council seeks assurances that London boroughs should continue to plan for housing on the basis of the London Plan and also that Government will continue to permit alternative approaches to assessing housing need, where justified.</p> <p>This will provide certainty for communities, developers and Councils in London, and allow us to continue our ambitious progress on our New Local Plan with a clear housing target.</p> |
| Q2: In the stock element of the baseline, do you agree that 0.5% of existing stock for the standard method is appropriate? If not, please explain why. | See answer to Q1 |
| Q3: Do you agree that using the workplace-based median house price to median earnings ratio from the most recent year for which data is available to adjust the standard method's baseline is appropriate? If not, please explain why. | See answer to Q1 |
| Q4: Do you agree that incorporating an adjustment for the change of affordability over 10 years is a positive way to look at whether affordability has improved? If not, please explain why. | See answer to Q1 |
| Q5: Do you agree that affordability is given an appropriate weighting within the standard method? If not, please explain why. | See answer to Q1 |
| Q6: Authorities which are already at the second stage of the strategic plan consultation process (Regulation 19), | N/A |

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| which should be given 6 months to submit their plan to the Planning Inspectorate for examination? | |
| Q7: Authorities close to publishing their second stage consultation (Regulation 19), which should be given 3 months from the publication date of the revised guidance to publish their Regulation 19 plan, and a further 6 months to submit their plan to the Planning Inspectorate? If not, please explain why. Are there particular circumstances which need to be catered for? | N/A |
| Delivering First Homes | |

| | |
|--|---|
| <p>Q8: The Government is proposing policy compliant planning applications will deliver a minimum of 25% of onsite affordable housing as First Homes, and a minimum of 25% of offsite contributions towards First Homes where appropriate. Which do you think is the most appropriate option for the remaining 75% of affordable housing secured through developer contributions? Please provide reasons and / or evidence for your views (if possible):</p> <p>i) Prioritising the replacement of affordable home ownership tenures, and delivering rental tenures in the ratio set out in the local plan policy.</p> <p>ii) Negotiation between a local authority and developer.</p> <p>iii) Other (please specify)</p> | <p>The Council opposes the Government's proposed approach of setting out in policy that a minimum of 25 per cent of all affordable housing units secured through developer contributions should be First Homes. This is a blunt and 'one size fits all' approach to delivering so-called 'affordable housing' which is not appropriate for the varying circumstances of each local authority. Local authorities are best placed to plan for new affordable housing in their areas to best meet local need.</p> <p>The scheme prioritises state subsidy for 'affordable housing' for home ownership products which will be out of reach for those most in need, rather than prioritising council and social rent products which better meet the needs of local people.</p> <p>The Council considers that Option 1 would be most appropriate option for the remaining 75% of affordable housing secured through developer contributions. Haringey's adopted Local Plan 2017 requires an affordable housing tenure mix of 60% affordable rent (including social rent) and 40% intermediate (including affordable home ownership) (with the tenure mix is reversed in Tottenham). Option 1 would enable the Council to continue to secure 60% of total affordable units as affordable rent (including social rent). These tenures represent the greatest need in the borough. Under Option 1 62.5% of intermediate affordable homes secured would be First Homes. This would be detrimental to the overall tenure mix as the Council has other preferences for intermediate housing within this allowance such as for London Living Rent, Discounted Market Rent, Affordable Private Rent and Shared Ownership / Equity. Discounted Market Sale such as First Homes and Rent to buy are not a priority for the Council to meet local needs. This is set out in the Council's revised Appendix C (March 2019) to its Housing Strategy.</p> |
| <p>Q9: Should the existing exemptions from the requirement for affordable home ownership products (e.g. for build to rent) also apply to apply to this First Homes requirement?</p> | <p>Yes. The Council considers that the affordable housing requirements set out in Policy H11 of the Intend to Publish London Plan should continue to apply to build to rent schemes. The policy sets out that the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.</p> |

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| Q10: Are any existing exemptions not required? If not, please set out which exemptions and why. | Yes. The Government needs to consider how this fits with policies on delivering affordable housing for older people's housing developments and purpose-built student accommodation. |
| Q11: Are any other exemptions needed? If so, please provide reasons and /or evidence for your views. | Yes. It is important that estate regeneration schemes, Council-led housing schemes and other affordable housing led developments are exempt from needing to provide First Homes. |
| Q12: Do you agree with the proposed approach to transitional arrangements set out above? | Yes. The Council agrees that where significant work has already been undertaken to progress a planning application, including where there has been significant pre-engagement with a local authority on the basis of a different tenure mix of affordable housing, the local authority should have flexibility to accept alternative tenure mixes. |
| Q13: Do you agree with the proposed approach to different levels of discount? | No. The Council does not agree that a simple discount on home ownership products provides affordable housing for those in need. A 30%, 40% or 50% is still not enough of a discount to make the housing affordable for many residents. Affordable council and social rent products are required to meet the needs of those who are not in a position to buy at market price or with a discount. |
| Q14: Do you agree with the approach of allowing a small proportion of market housing on First Homes exception sites, in order to ensure site viability? | N/A |
| Q15: Do you agree with the removal of the site size threshold set out in the National Planning Policy Framework? | N/A |
| Q16: Do you agree that the First Homes exception sites policy should not apply in designated rural areas? | N/A |
| Affordable housing threshold | |
| Q17: Do you agree with the proposed approach to raise the small sites threshold for a time-limited period? | <p>The Council opposes the Government's proposal to temporarily raise the affordable housing threshold from 10 homes to either 40 or 50 homes. The major effect of this will be to considerably reduce the delivery of much needed affordable housing. The Government has estimated that the proposal would reduce affordable housing delivery by between 7% and 20%. We consider that this is an underestimate. Since 2016 22% of affordable housing approved in Haringey has been on schemes of 10-49 units.</p> <p>The Government indicates that the proposal is designed to support SMEs in the medium term during economic recovery from Covid-19 by reducing the burden of contributions for more sites for a time-limited period. This would presumably be to keep SME developers in</p> |

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| | <p>business and to encourage them to get on with delivery of housing without delay. The Government has presented no evidence to indicate that the proposal would support either of these aims.</p> <p>It is not considered that the delivery of affordable housing itself would cause an SME builder to go insolvent. National policy already includes provisions to mitigate affordable housing requirements where they can be demonstrated to be unviable. Furthermore, affordable housing can also be an important tool for controlling risk within housing schemes with the sale of affordable units to a registered provider in bulk providing certainty and income important to scheme cash flow.</p> <p>The Government's suggested increase in threshold to either 40 or 50 units appears to be completely arbitrary. It does not take account of local viability which in Haringey's case is strong for schemes of greater than 10 units. In any event, as already mentioned, national policy already includes provisions to mitigate affordable housing requirements where there are demonstrable reasons why the delivery of the target level of affordable housing is not viable.</p> <p>An obvious consequence of the proposal is that the price of land for small sites will go up significantly. The reduction in the affordable housing burdens related to the development will cause the residual price of small sites to rise, logically to a point where it completely offsets the reduction. The increase in the threshold would therefore only be positive for builders sitting on a bank of small sites which they own outright and without overage agreements. It is understood these account for only a small proportion of SME builders. It may actually be detrimental to the greater proportion of SME builders as the value of sites is likely to rise considerably.</p> <p>Increasing the affordable housing threshold could in fact have unintended consequences for delivery of small sites. The proposal does not encourage builders with consented land to bring it forward as expeditiously as possible (this consultation will already have delayed many schemes as they wait for potential changes to the threshold). Where schemes between the current threshold and the new increased threshold have an extant consent which includes an element of affordable housing it is likely a new consent will be sought based on no affordable housing. This</p> |
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| | <p>will further delay delivery and result in a reduction in affordable housing delivery. This is, of course, without regard to whether the original scheme was viable or not.</p> <p>The threshold may also serve to disincentivise developers to make the most efficient use of land (i.e. by bringing forward developments artificially just below the threshold rather than seeking to maximise density) and thus generating less housing delivery overall.</p> |
| <p>Q18: What is the appropriate level of small sites threshold?</p> <p>i Up to 40 homes</p> <p>ii Up to 50 homes</p> <p>iii Other (please specify)</p> | No, see answer to Q17 |
| Q19: Do you agree with the proposed approach to the site size threshold? | No, see answer to Q17 |
| Q20: Do you agree with linking the time-limited period to economic recovery and raising the threshold for an initial period of 18 months? | No, see answer to Q17 |
| Q21: Do you agree with the proposed approach to minimising threshold effects? | The Council does not support the proposed change to raise the small-sites threshold for a time-limited period. However, in the event that the threshold is changed the Government should provide updated guidance to ensure that threshold effects are minimised. |
| Q22: Do you agree with the Government's proposed approach to setting thresholds in rural areas? | N/A |
| Q23: Are there any other ways in which the Government can support SME builders to deliver new homes during the economic recovery period? | The Government should support SME builders by grant funding to bring forward low cost rent affordable housing. This would assist with development viability, improve cash flow, control risk, speed up delivery and will also help deliver an additional supply of affordable homes for which there is an overwhelming need. |
| Permission in Principle | |
| Q24: Do you agree that the new Permission in Principle should remove the restriction on major development? | The Council opposes major development being allowed through the new route of 'Permission in Principle' (PIP) consents rather than the normal planning permission route. The expansion of PIP to cover 150 dwellings or 5 hectares would mean Permission in Principle could be sought on larger, more significant and more complex sites which are not suitable for determination via this route (absent of key technical information). PIP also does not provide a suitable mechanism for assessing cumulative impacts of development. If PIP is granted on multiple major schemes within |

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| | <p>an area then there is an increased risk of such issues not being addressed.</p> <p>This consent route would exist in parallel to the existing 'conventional' planning permission route and would be confusing for communities and make it more difficult for them to understand how they can influence the changes in their area. The Government's proposals are not clear on the roles of elected members and Planning Committees in this new consent route. The democratic functioning of the planning system must not be bypassed.</p> |
| <p>Q25: Should the new Permission in Principle for major development set any limit on the amount of commercial development (providing housing still occupies the majority of the floorspace of the overall scheme)? Please provide any comments in support of your views.</p> | <p>Yes. While the Council agrees that non-housing development that is compatible and well-integrated into residential development can help to create sustainable neighbourhoods, it is important that most new commercial development is directed to appropriate locations such as town centres, employment areas and industrial estates. The current limit for Permission in Principle for commercial development is 1,000sqm or 1 hectare which is more appropriate.</p> |
| <p>Q26: Do you agree with our proposal that information requirements for Permission in Principle by application for major development should broadly remain unchanged? If you disagree, what changes would you suggest and why?</p> | <p>The Council does not support major development being allowed through the new route of 'Permission in Principle' (PIP) consents rather than the normal planning permission route. The expansion of PIP to cover 150 dwellings or 5 hectares would mean Permission in Principle could be sought on larger, more significant and more complex sites which are not suitable for determination via this route (absent of key technical information).</p> <p>If the Government does remove the restriction on major development it will be necessary to extend the information requirements. There would need to be some mechanism for taking account of cumulative impacts. It is a concern that PIP does not properly consider health impacts.</p> <p>It will also be necessary to increase the 14-day period for consultation with the public and statutory consultees and the 5-week determination period which is not desirable or achievable for larger and more complex sites.</p> <p>It is considered that these types of consents would effectively become outline planning permission under another guise.</p> |
| <p>Q27: Should there be an additional height parameter for Permission in</p> | <p>No, there should not be an additional height parameter for Permission in Principle. This is not appropriate to assess or determine in the</p> |

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| Principle? Please provide comments in support of your views. | absence of detailed plans. This means that height would still need to be an issue considered in detail at Technical Details Consent stage. |
| Q28: Do you agree that publicity arrangements for Permission in Principle by application should be extended for large developments? If so, should local planning authorities be: i) required to publish a notice in a local newspaper? ii) subject to a general requirement to publicise the application or iii) both? iv) disagree If you disagree, please state your reasons. | The Council agrees that that local communities should have the opportunity to make representations on major development that might affect them. If the Government does remove the restriction on major development, it will be necessary to amend the publicity requirements for Permission in Principle by application. It will also be necessary to increase the 14-day period for consultation with the public and statutory consultees to give local communities an appropriate opportunity to respond. This, in turn, will require an increase to the current 5-week determination period. In general, the Council does not consider publication of notices in a local newspaper is an effective method of publicity. |
| Q29: Do you agree with our proposal for a banded fee structure based on a flat fee per hectare, with a maximum fee cap? | No. The Government should set fees based on evidence of the cost of processing such Permission in Principle applications to ensure the costs are fully covered by the applicant. |
| Q30: What level of flat fee do you consider appropriate, and why? | N/A |
| Q31: Do you agree that any brownfield site that is granted Permission in Principle through the application process should be included in Part 2 of the Brownfield Land Register? If you disagree, please state why. | Yes |
| Q32: What guidance would help support applicants and local planning authorities to make decisions about Permission in Principle? Where possible, please set out any areas of guidance you consider are currently lacking and would assist stakeholders. | While land use and location are appropriate for determination on an in-principle basis through Permission in Principle, it is not considered that scale of development is. This requires detailed consideration and assessment of design, plans and technical information and is not appropriate for the Permission in Principle route. The Government should clarify how local planning authorities are expected to make decisions about scale of development where key planning considerations such as heritage assets need to be taken account of (note: there is also a legal requirement to do this). |
| Q33: What costs and benefits do you envisage the proposed scheme would cause? Where you have identified drawbacks, how might these be overcome? | N/A |
| Q34: To what extent do you consider landowners and developers are likely to use the proposed measure? Please provide evidence where possible. | N/A |

| Equalities | |
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| <p>Q35: In light of the proposals set out in this consultation, are there any direct or indirect impacts in terms of eliminating unlawful discrimination, advancing equality of opportunity and fostering good relations on people who share characteristics protected under the Public Sector Equality Duty?</p> <p>If so, please specify the proposal and explain the impact. If there is an impact – are there any actions which the department could take to mitigate that impact?</p> | <p>The Government's proposals for First Homes and raising the affordable housing threshold are likely to have negative impacts on protected groups as they will reduce the supply of affordable housing which meets genuine local needs.</p> <p>The Government's focus should be on boosting the supply of affordable housing which meets genuine local needs.</p> <p>The Government's proposals for expanding Permission in Principle will make it harder for communities to engage in the planning system, particularly those that may be in protected groups.</p> <p>Low quality developments consented through PIP have potential to give rise to health impacts, which may disproportionately affect people with protected characteristics.</p> |

**DRAFT COUNCIL RESPONSE TO GOVERNMENT CONSULTATION ON PLANNING
FOR THE FUTURE: WHITE PAPER**

OCTOBER 2020

**White Paper: Planning for the Future Consultation
Ministry of Housing, Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF**

To be sent by email to planningforthefuture@communities.gov.uk

Consultation on Planning for the Future: White Paper Consultation

Thank you for the opportunity to respond to the consultation on the Planning for the Future White Paper.

The consultation sets out a very broad package of proposals for reform of the planning system in England. While we welcome several of the proposals, such as greater use of digital technology in plan-making and decision-taking, we have a series of concerns with the White Paper as a whole. Our key concerns are set out below.

Resources

Local Planning Authorities (LPAs) are already under considerable resource pressure with the current system and fee set-up. Far greater resources will be needed to deliver the types of Local Plan envisaged by the White Paper. Introducing a new 'zoning' style system in parallel with the existing system will add significant strain on resources and will require resources to be much more front-loaded. The shift to greater use of digital technology will also require additional resources. We note the White Paper saying the Government will look at how extra resources can be made available for LPAs to support the delivery of the reforms, but wish to reiterate that the resource issue will need to be seriously addressed.

We oppose the reforms which would grant automatic refunds or rebates of planning fees and oppose deemed planning permission beyond certain time limits.

Democracy

We are concerned that the proposals for more streamlined planning decisions could undermine the important democratic role of the planning system, either via public consultation or via Planning Committees – democratic input is crucial to gain communities' trust in the planning system, and also to deliver better development on the ground

It is also considered that a new 'zoning' style system which runs in parallel with the existing system could be very confusing for communities.

Affordable housing/infrastructure delivery

The Council is concerned about the proposals for a reformed 'Infrastructure Levy', particularly the potential consequences for affordable housing delivery if future provision is to

be secured through the levy rather than through planning obligations. It is unclear too what will happen to other non-financial obligations which are covered by Section 106 such as employment and skills training and off-site provision of play space. The Infrastructure Levy should increase delivery of affordable housing and the value of infrastructure contributions versus the current Section 106 and Community Infrastructure Levy regime.

Climate change

The Council declared a climate emergency in March 2019 following strong local lobbying. We consider that climate change is not given sufficient weight in the White Paper. Reducing carbon emissions and mitigating and adapting to climate change are a key component of creating sustainable places and the planning system is a key tool to achieve this.

The White Paper aims to deliver net-zero greenhouse emissions by 2050. This needs to be more ambitious and happen sooner. This would be a backwards step for the Council which seeks to achieve a net-zero borough by 2041

Not only is climate change not explicitly addressed in this White Paper, it is undermined in a number of key ways. The White Paper relies on the Future Homes Standard (FHS) to set the carbon reduction standards, however as set out in our response to the FHS consultation it falls short on a number of important aspects such as unregulated and embodied emissions reductions, changing the emphasis from a fabric-first approach to that relying on renewables and grid decarbonisation and the way it treats Decentralised Energy Networks.

The reformed planning system should signal its support for delivering zero carbon homes. We support the need for a national approach to requiring all new development to meet high environmental and carbon standards, requiring these to be zero carbon with low overheating risk without relying on air conditioning.

The abolishment of Section 106 will have major implications for delivering carbon reductions and climate change mitigation in our borough. We need obligations to establish, build and connect developments to decentralised energy networks. Only a handful of sites will be eligible for on-site energy centres, and it requires Section 106 agreements to ensure that adjacent and nearby sites commit to building the necessary infrastructure to connect to a wider network, undertake the necessary feasibility work to connect, commit to building to appropriate design standards and pay for necessary connection charges or offset contributions. It will also take away the possibility of securing carbon offset contributions where developments offset emissions they cannot deliver on site.

Next steps

The Government will need to consult on more details in due course, with relevant parliamentary scrutiny of any new primary or secondary legislation. There will need to be a lengthy transition period to minimise disruption.

Please find the Council's responses to the individual questions on the following pages. Please contact Bryce Tudball, Planning Policy Team Manager, should you require further information or clarification.

Changes to the current planning system: Consultation on changes to planning policy and regulations

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| Pillar One – Planning for development |
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| Q1: What three words do you associate most with the planning system in England? | N/A |
| Q2: Do you get involved with planning decisions in your local area? [Yes / No] 2(a). If no, why not? [Don't know how to / It takes too long / It's too complicated / I don't care / Other – please specify] | I am responding on behalf of a Local Planning Authority (Haringey Council). |
| Q3: Our proposals will make it much easier to access plans and contribute your views to planning decisions. How would you like to find out about plans and planning proposals in the future? [Social media / Online news / Newspaper / By post / Other – please specify] | The Council welcomes the Government's proposals to make it easier for communities to access plans and contribute their views on planning decision. In particular, the Council supports the move towards modern digital planning services which are inclusive for all members of society. However, it is important to recognise that local planning authorities will require additional resources to increase engagement beyond current levels and to digitise how it is done. The cost of delivering this will be substantial as there will need to be considerable investment in resource, skills and technology to facilitate it. |
| Q4: What are your top three priorities for planning in your local area? [Building homes for young people / building homes for the homeless / Protection of green spaces / The environment, biodiversity and action on climate change / Increasing the affordability of housing / The design of new homes and places / Supporting the high street / Supporting the local economy / More or better local infrastructure / Protection of existing heritage buildings or areas / Other – please specify] | The Haringey Borough Plan 2019-2031 sets out the Council's four priorities: Housing, People, Place and Economy. Key priorities for planning in Haringey include: being a fairer borough which has significantly reduced inequalities and considerably narrowed the gap in outcomes; being a zero-carbon borough by 2041, playing a leading role in taking action to address climate change and developing resilience to its effects; and increasing the supply of genuinely affordable homes so everyone has a safe, stable and affordable homes, regardless of their circumstances. |
| Q5: Do you agree that Local Plans should be simplified in line with our proposals? [Yes / No / Not sure. Please provide supporting statement.] | The Council welcomes that Local Plans are proposed to be retained as a key part of the planned system. The Council agrees with the principle of simplifying Local Plans, however it is considered that placing all areas of land into one of three categories would be a significant oversimplification and would not be able to take sufficient account of the different characteristics of land and its potential for accommodating new development. The alternative option of combining growth and renewal areas into one category is less preferred. The Council is concerned about the prospect of having to produce Local Plans which grant Permission of Principle consent. Notwithstanding that this would be a substantial task requiring major resource, this route is not |

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| | <p>considered appropriate for granting permission on large and complex sites and risks undermining local democracy. The process involved in undertaking detailed site assessment and initial masterplanning to establish the appropriate level of development for a site, and subsequent consultation for a significant number of sites in a Local Plan, would also add considerable time to the process of Plan preparation, undermining the objective of streamlining.</p> |
| <p>Q6: Do you agree with our proposals for streamlining the development management content of Local Plans, and setting out general development management policies nationally? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The Council objects to the proposal that there should be no provision for the inclusion of generic development management policies within Local Plan. It is unclear how blanket national development management policies would work given each local planning authority is unique and there are major differences between many of them. The Council prefers the alternative option stated which would allow local authorities a similar level of flexibility to set development management policies as under the current Local Plans system, with the exception that policies which duplicate the National Planning Policy Framework would not be allowed. The Council supports the principle of policies being written in machine-readable format so that they can be used by digital services to automatically screen developments and help identify where they align with policies and/or codes, however this would needed to be tested in advance of wider roll-out to ensure that it works effectively.</p> <p>The proposal notes that design codes would ideally be produced on a 'twin track' with Local Plans. Local planning authorities would require significantly more resources to do both these tasks in parallel.</p> |
| <p>Q7: Do you agree with our proposals to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact? [Yes / No / Not sure. Please provide supporting statement.] 7(b). How could strategic, cross-boundary issues be best planned for in the absence of a formal Duty to Cooperate?</p> | <p>The Council broadly supports the proposal to replace existing legal and policy tests for Local Plans with a consolidated test of "sustainable development", which would include consideration of environmental impact. It is considered that this could help local planning authorities to get Local Plans adopted more quickly while at the same time ensuring that they continue to be sufficiently robust and deliver the key aims of the English planning system. The current system places a very high bar for Local Plans at examination which does not lend itself to fast production of Local Plans. The Government's alternative options of reforming the tests to make it easier for a suitable strategy to be found sound also appears to be reasonable.</p> |

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| | <p>The Council notes that the Duty to Cooperate is proposed to be removed with further consideration will be given to the way in which strategic cross-boundary issues, such as major infrastructure or strategic sites, can be adequately planned for, including the scale at which plans are best prepared in areas with significant strategic challenges). While this is broadly supported, it is essential that a comprehensive framework is put in place for strategic planning in England. The Council strongly recommends that the London Plan/Spatial Development Strategy is maintained as this provides an integrated economic, environmental, transport and social framework for the future development of London.</p> |
| <p>Q8 (a). Do you agree that a standard method for establishing housing requirements (that takes into account constraints) should be introduced? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>8(b). Do you agree that affordability and the extent of existing urban areas are appropriate indicators of the quantity of development to be accommodated? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The Council does not consider that a revised standard method is an appropriate route for establishing a binding housing requirement figure for each local planning authority. An algorithm of the type proposed would not take proper account of the land and other constraints that a local planning authority is subject to nor the opportunities that might be available for accommodating new development.</p> <p>Haringey is located within Greater London and is subject to the Mayor of London's statutory spatial development strategy ("the London Plan"). The London Plan assesses housing need for the capital as a whole and then apportions targets based on the capacity of the 32 boroughs to accommodate new homes. This approach to planning for housing was found sound at examination in 2019. The White Paper states that it may be appropriate for Mayors of combined authorities to oversee the strategic distribution of the requirement in a way that alters the distribution of numbers. The Council supports this and seeks confirmation that this will continue to be the case in London. This will provide certainty for communities, developers and Councils in London, and allow us to continue our ambitious progress on our New Local Plan with a clear, deliverable housing target.</p> |
| <p>Q9 (a). Do you agree that there should be automatic outline permission for areas for substantial development (Growth areas) with faster routes for detailed consent? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>9(b). Do you agree with our proposals above for the consent arrangements for Renewal and Protected areas?</p> | <p>No. The Council does not support the establishment of a parallel consent system to the existing 'conventional' planning permission route. As a starting point, this change would be confusing for communities and make it more difficult for them to understand how they can influence the changes in their area. The grant of planning permissions via this route would reduce the opportunity for communities to be involved in the planning decisions which affect them. The</p> |

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| <p>[Yes / No / Not sure. Please provide supporting statement.]</p> <p>9(c). Do you think there is a case for allowing new settlements to be brought forward under the Nationally Significant Infrastructure Projects regime? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Council notes that the Government proposes more/better public engagement as part of the preparation of Local Plans, however it is concerned about the extent to which this is achievable. Local planning authorities would need to be provided with significantly more resource to deliver this, and the implications on timeframes therefore should not be overlooked. The Council is also concerned about the diminished role of elected members and Planning Committees in this new consent route. The democratic functioning of the planning system must not be bypassed. The Government has indicated that it wants Local Plans to be produced much quicker. If the Council is to grant planning consents for substantial developments via the planmaking process then it will need to carry out significant work in this regard to ensure its conclusions are sound. This would take a significant amount of time and appears incompatible with fast plan production. The work required to support this would come at considerable cost (e.g. evidence base assembly) and there would also be considerable cost associated with the public engagement around substantial sites. Local planning authorities would therefore need to be provided with significantly more resources to bring forward the type of Local Plans envisaged by the Government. It is essential that where development is restricted that any development proposals coming forward would come forward as now through planning applications being made to the local authority.</p> |
| <p>Q10: Do you agree with our proposals to make decision-making faster and more certain?</p> <p>[Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The Council is one of the best performing authorities in London for making planning decisions on a timely basis. Notwithstanding this, there are a range of legitimate reasons why an application may not be possible be determined within statutory time limits and therefore an extension of time is required. We therefore oppose the Government's proposals that there should be automatic refunds of planning fees if an authority fails to determine it within the time limit or that with some types of applications there should be a deemed grant of planning permission if there has not been a timely determination.</p> <p>As a general principle, we support the greater use of digital technology within the application process. Authorities will however need to be provided with greater resources to deliver this.</p> |

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| <p>Q11: Do you agree with our proposals for accessible, web-based Local Plans? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The Council is in general agreement that Local Plans should be made more accessible and web-based. We also support the plan-making process being digitised, particularly where this support greater community engagement with Local Plans. It should be noted however that authorities will require additional resources to deliver this. It must also be remembered that there are key sections of the community who are excluded from digital engagement or who prefer to engage through more traditional methods. There must continue to be a focus involving these people in the decisions which affect them.</p> |
| <p>Q12: Do you agree with our proposals for a 30 month statutory timescale for the production of Local Plans? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The Council does not consider that the proposed statutory timescales are realistic. The timescales do not provide sufficient opportunities for public engagement, especially the enhanced role that the Government is suggesting during Plan preparation, and they do not have regard to the democratic processes of Councils. The type of Local Plans which the Government envisages will need to be supported by significant amounts of evidence, especially if grant consents for substantial developments within growth areas. Authorities do not currently have resources to deliver the Local Plans that the Government wishes to see delivered, let alone within 30 month statutory timescales. Significantly more resource needs to be provided by Government to local planning authorities to enable them to produce high-quality plans in a timely fashion.</p> |
| <p>Q13: (a). Do you agree that Neighbourhood Plans should be retained in the reformed planning system? [Yes / No / Not sure. Please provide supporting statement.] 13(b). How can the neighbourhood planning process be developed to meet our objectives, such as in the use of digital tools and reflecting community preferences about design?</p> | <p>The Council agrees that Neighbourhood Plans should be retained. These are an important tool for local communities to shape development within their area.</p> |
| <p>Q14: Do you agree there should be a stronger emphasis on the build out of developments? And if so, what further measures would you support? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Yes. The Council notes the important role of affordable housing in helping support the delivery of schemes. This de-risks major schemes and supports developer cash flow where affordable homes are sold in bulk. The Government should enable the delivery of more low cost rented affordable homes by providing additional grant funding. Additional measures should be targeted at developers and housebuilders, particularly where a developer or house builder has a track record of slow or non-delivery and land banking. Expansion of and alternatives to the 'use it or lose it' proposal for planning permissions should</p> |

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| | be explored. Support would be given for enhanced and streamlined CPO powers for Council's to enable them to take control of stalled or non-delivering sites quickly, and ensure they are completed on time. |
| Pillar Two – Planning for beautiful and sustainable places | |
| Q15: What do you think about the design of new development that has happened recently in your area? [Not sure or indifferent / Beautiful and/or well-designed / Ugly and/or poorly-designed / There hasn't been any / Other – please specify] | N/A |
| Q16: Sustainability is at the heart of our proposals. What is your priority for sustainability in your area? [Less reliance on cars / More green and open spaces / Energy efficiency of new buildings / More trees / Other – please specify] | The Haringey Borough Plan 2019-2033 sets out the Council's four priorities: Housing, People, Place and Economy. Key priorities for planning in Haringey include: being a fairer borough which has significantly reduced inequalities and considerably narrowed the gap in outcomes; being a zero-carbon borough by 2041, playing a leading role in taking action to address climate change and developing resilience to its effects; and increasing the supply of genuinely affordable homes so everyone has a safe, stable and affordable homes, regardless of their circumstances. |
| Q17: Do you agree with our proposals for improving the production and use of design guides and codes? [Yes / No / Not sure. Please provide supporting statement.] | <p>The Council considers that design codes and guides are a good idea in principle and takes the view that they would help support much better urban design. They would be essential as part of the reformed planning system envisaged by the Government. As a general point, the Council favours design codes being binding on decisions about development.</p> <p>The Council supports community participation in the process of producing design guides and codes and regards local buy-in (alongside professional expertise) as essential. The production of high-quality design codes and guides will however take time and would require resource and expertise to deliver. This would be especially challenging as part of a Local Plan with statutory timescales.</p> <p>It is noted that there are a range of routes through which design codes could be produced (e.g. council led/developer-led). Developer-led design codes can be suitable for large sites with a single, large developer but can be problematic with multiple developers or smaller sites where co-operation is required. There is also a concern about whether the design codes produced will truly be in the public interest. As a general point,</p> |

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| | the Council favours design codes being binding on decision about development. |
| Q18: Do you agree that we should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making? [Yes / No / Not sure. Please provide supporting statement.] | Yes. the Council agree that the Government should establish a new body to support design coding and building better places, and that each authority should have a chief officer for design and place-making. We particularly agree with the Government where it says that its vision for beauty will require improved resourcing of planning departments. Design codes and guides are resource and personnel intensive, as is community engagement associated with them, and extra resource would also need to extend to the funding of a chief officer for design and place-making. |
| Q19: Do you agree with our proposal to consider how design might be given greater emphasis in the strategic objectives for Homes England? [Yes / No / Not sure. Please provide supporting statement.] | Yes |
| Q20: Do you agree with our proposals for implementing a fast-track for beauty? [Yes / No / Not sure. Please provide supporting statement.] | <p>The Council does not agree that a fast-track should be introduced for beauty. While design is a key consideration when making planning decisions, it is just one of potentially many important considerations. Expediting approvals based purely on design is therefore not supported.</p> <p>As a general point, the Council favours design codes being binding on decisions about development. This would require design codes to be written such that anything in compliance is deemed to be acceptable from a design standpoint. Compliance with an adopted design-code could be treated as a 'tick-box' exercise which confers planning permission provided the principle of a development is accepted and other requirements/standards are met. There should be an option available to diverge from the design code but this should require consideration via a 'conventional' planning application route.</p> |
| Pillar Three – Planning for infrastructure and connected places | |
| Q21: When new development happens in your area, what is your priority for what comes with it? [More affordable housing / More or better infrastructure (such as transport, schools, health provision) / Design of new buildings / More shops and/or employment space / Green space / Don't know / Other – please specify] | N/A |
| Q22 (a). Should the Government replace the Community Infrastructure | The Council considers that there is considerable scope to improve the current Community |

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| <p>Levy and Section 106 planning obligations with a new consolidated Infrastructure Levy, which is charged as a fixed proportion of development value above a set threshold? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>22(b). Should the Infrastructure Levy rates be set nationally at a single rate, set nationally at an area-specific rate, or set locally? [Nationally at a single rate / Nationally at an area-specific rate / Locally]</p> <p>22(c). Should the Infrastructure Levy aim to capture the same amount of value overall, or more value, to support greater investment in infrastructure, affordable housing and local communities? [Same amount overall / More value / Less value / Not sure. Please provide supporting statement.]</p> <p>22(d). Should we allow local authorities to borrow against the Infrastructure Levy, to support infrastructure delivery in their area? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Infrastructure Levy (CIL) and Section 106 planning obligations regimes. Based on the (limited) information provided in the White Paper the Council does however have considerable concerns about the introduction of a new consolidated Infrastructure Levy to replace CIL and S106. Firstly, the Council has significant concerns that the consolidated Infrastructure Levy would raise less money than is currently raised through CIL and Section 106. The White Paper sets out that the Government aims to increase revenues nationally but this could mean that revenues fall in some areas. It is essential that the Infrastructure Levy captures the same amount of value overall, or more value (on a local authority area basis), to support greater investment in infrastructure, affordable housing and local communities.</p> <p>Secondly the Council is concerned about the practical implications of replacing Section 106 which has great importance beyond securing financial contributions from development. Sectional 106 is used to secure a variety of non-financial obligations (e.g. offsite or in-kind provision) and it is also a key tool for controlling key planning matters such as phasing/sequencing.</p> <p>The Council supports the Government's alternative option that Infrastructure Levy could remain optional and would be set by individual local authorities. This is necessary to take account of the unique development economics relating to each authority. A national rate is completely inappropriate given the huge difference in development values across the country. An area-based rate would also not be appropriate. For example, development values vary greatly within and across London.</p> <p>The Council supports the opportunity to borrow against the Infrastructure Levy to support infrastructure delivery. It is concerning however that the new Infrastructure Levy could push further risk onto authorities as would appear to create a greater reliance of forward funding via borrowing. It is difficult to make reliable forecasts about future income from a fixed levy.</p> |
| <p>Q23: Do you agree that the scope of the reformed Infrastructure Levy should capture changes of use through permitted development rights? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>Yes, this would provide additional funding to address the infrastructure demands created by new development. It may also help make development more acceptable to local communities.</p> |

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| <p>Q24 (a). Do you agree that we should aim to secure at least the same amount of affordable housing under the Infrastructure Levy, and as much on-site affordable provision, as at present? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>24(b). Should affordable housing be secured as in-kind payment towards the Infrastructure Levy, or as a 'right to purchase' at discounted rates for local authorities? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>53</p> <p>24(c). If an in-kind delivery approach is taken, should we mitigate against local authority overpayment risk? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>24(d). If an in-kind delivery approach is taken, are there additional steps that would need to be taken to support affordable housing quality? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>If affordable housing is to be secured as part of the consolidated Infrastructure Levy it is essential that this secures at least the same amount of affordable housing, and as much on-site affordable provision, as at present. The aim should be to achieve increased levels of affordable housing delivery, particularly low-cost rented homes. It is also essential that there are safeguards in place to ensure that affordable housing quality is of the appropriate quality.</p> <p>Affordable housing targets should continue to be set by individual authorities based on assessments of local need and viability. The Council objects to any nationally set proportion such as is suggested under the 'right to purchase' alternative option.</p> <p>If an in-kind delivery approach is taken, there should be no local authority overpayment risk in respect of affordable housing. The developer should be required to meet the Council's affordable housing policies regardless of the whether the Infrastructure Levy covers the cost of this.</p> |
| <p>Q25 Should local authorities have fewer restrictions over how they spend the Infrastructure Levy? [Yes / No / Not sure. Please provide supporting statement.]</p> <p>25(a). If yes, should an affordable housing 'ring-fence' be developed? [Yes / No / Not sure. Please provide supporting statement.]</p> | <p>The Council agrees that local authorities should have fewer restrictions over how the Infrastructure Levy is spent.</p> |
| Equalities | |
| <p>Q26: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?</p> | <p>The proposals are very wide-ranging and have potential to impact both positively and negatively on protected groups. It is important that the impacts are properly considered as the proposals are refined and progressed.</p> |

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