

Report for: Cabinet, 13 October 2020

Title: New Haringey Local Plan – First Steps Engagement

Report

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

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 Cabinet Member Introduction

- 2.1 Our existing Local Plan was adopted over three years ago. Since then, the Council has published a new Borough Plan, driven by the administration's manifesto commitments to reducing inequality. In 2019, Haringey Council declared a Climate Emergency.
- 2.2 We need a new Local Plan to provide a robust and fit-for-purpose planning framework for the borough. It is the framework by which we will make planning decisions for the long-term future of our borough. We need to deliver on the Borough Plan's commitment to genuinely affordable housing for Haringey residents. We need to hard-wire sustainability into planning decisions to achieve our ambitious target of carbon neutrality by 2041. We need to deliver community-led growth for our residents and businesses, and reflect the New London Plan as we do so. The new Local Plan will help us achieve these things.
- 2.3 All of this must be done in the light of the COVID-19 pandemic. The New Local Plan will help us make a broad and lasting recovery.
- 2.4 This First Steps document allows us to engage and consult with residents, businesses and other stakeholders from the very beginning, so that this Local Plan will be shaped at every stage by the people it serves.

3 Recommendations

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

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

4 Reasons for decision

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

5 Alternative options considered

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

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

6 Background information

6.1 The Local Plan is the main Council document which:

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

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

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

National legislation, policy and guidance

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

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

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

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

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

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

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

“Plans should:

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

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

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

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

Intend to Publish London Plan (2019)

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

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

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

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

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

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

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

Existing Haringey Local Plan (2017)

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

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

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

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

New Haringey Local Plan

- 6.16 The four existing Haringey Local Plan documents (Strategic Policies, DM Policies, Site Allocations, Tottenham AAP) will be completely replaced by the New Haringey Local Plan in a single document. It is proposed that the New Local Plan will have a 15 year timeframe, starting from adoption in 2022 and covering the period to 2037.
- 6.17 The New Haringey Local Plan will be structured based on the Borough Plan priorities **Housing, People, Place** and **Economy**.
- 6.18 As the Intend to Publish London Plan is expected to become part of the statutory Development Plan once it is published (adopted) in late 2020, the New Haringey Local Plan does not need to duplicate policies in the London Plan which the Council is satisfied accords with its own objectives and aspirations. Therefore, within the structure of the Borough Plan priorities, the New Haringey Local Plan will, to an extent, follow a similar structure to, and signpost policies in, the New London Plan.
- 6.19 However, many policies do require a locally-specific Haringey variation to ensure the New Haringey Local Plan policies are compatible with the Council's wider corporate strategies and policies. These locally-specific policies will require a substantial local evidence base to justify a Haringey-specific approach.

Plan-making process

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

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

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

Timetable

- 6.23 The Act requires Local Plans to “be prepared in accordance with the Local Development Scheme” (LDS) (S19(1)).
- 6.24 The Council's latest LDS was published in November 2019. As a result of a delay in getting a full Planning Policy Team in place and also COVID-19 the timetable for preparing the New Local Plan has been slightly delayed. Table 1 below sets out the LDS programme together with the revised indicative programme. The LDS will be updated at a later point to reflect the amended timetable.

Table 1: New Local Plan timetable

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

New Local Plan – First Steps engagement document

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

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

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

Table 2: First Steps Engagement document – Overview

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

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

6.27 The document repeats key themes throughout including:

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

Call for sites

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

Evidence Base

- 6.29 In line with national policy and guidance the New Local Plan must be informed and supported by a relevant and up-to-date evidence base that is adequate and proportionate. Officers have scoped out the evidence base required and have begun commissioning key evidence to inform the New Local Plan including a Strategic Housing Market Assessment. The documents are likely to include (non-exhaustive):

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

Integrated Impact Assessment (IIA)

- 6.30 With regard to sustainability, the Act requires Local Plans to:
- “include policies designed to secure that the development and use of land in the LPA’s area contribute to the mitigation of, and adaptation to, **climate change**” (S19(1A));
 - “carry out an **appraisal of the sustainability** of the proposals... [and] prepare a report of the findings of the appraisal” (S19(5)); and
 - “exercise the function with the objective of contributing to the achievement of **sustainable development**” (S39(2)).
- 6.31 An Integrated Impact Assessment (IIA) will be prepared and updated alongside each iteration of the New Haringey Local Plan to ensure the impacts on the following are fully considered, as required by legislation, policy and guidance:

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

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

Consultation

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

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

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

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

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

- Local Plan branding;

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

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

Risks

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

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

7 Regulatory Committee Comments

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

8 Contribution to strategic outcomes

- 8.1 The New Haringey Local Plan is cross-cutting and contributes to all the Borough Plan priorities of Housing, People, Place and Economy and the Borough Plan Equality Principles and the Pledges on Residents' Engagement, Voluntary & Community Sector and Businesses are highly relevant.
- 8.2 The Year 1 and Year 2 Delivery Plans for the Housing Priority include "Deliver new Local Plan" as the first delivery priority under Outcome 1) Objective a).
- 8.3 The Local Plan is also an important part of the borough's 'recovery and renewal' from COVID-19. As further iterations of the New Local Plan emerge, it will take account of the Council's emerging recovery strategies.

9 Statutory comments

Finance

- 9.1 The main recommendation is for Cabinet to approve public consultation on the New Haringey Local Plan First Steps Engagement consultation document. This is the first step in the process of preparing a New Local Plan for the borough.
- 9.2 The New Local Plan requires an ongoing budget for staff, evidence base and consultation costs which is to be met within the Planning Policy Team budget.

Procurement

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

Legal

- 9.4 The main legislation, policy and guidance relevant to Local Plans is summarised throughout this report.
- 9.5 The proposed consultation process in respect of the Local Plan: First Steps Engagement consultation document and the accompanying Integrated Impact Assessment Scoping Report are compliant with the provisions of Regulation 18.

Equality

- 9.6 The Council has a Public Sector Equality Duty under the Equality Act 2010 to have due regard to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
 - Advance equality of opportunity between people who share those protected characteristics and people who do not
 - Foster good relations between people who share those characteristics and people who do not.
- 9.7 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.
- 9.8 The proposed decision is to approve for public consultation the New Haringey Local Plan: First Steps Engagement consultation document (Appendix A). This consultation document has been published alongside an Integrated Impact Assessment Scoping Report (Appendix B) and Consultation and Engagement Plan (Appendix C). These documents set out the steps the Council will take to consult and engage with the general public on the New Local Plan, including individuals with protected characteristics.
- 9.9 The purpose is therefore to gather the views of the public on important issues and challenges in advance of developing the New Local Plan. The consultation process has been designed to gather a range of views, including those of individuals with protected characteristics. The document is intended to begin a conversation about the direction of the New Local Plan and as such it does not contain draft policies.
- 9.10 This decision will allow for consultation to proceed on the New Haringey Local Plan: First Steps Engagement consultation document (Appendix A), in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012. The Council will then carry out a second Regulation 18 engagement on a Draft Local Plan, which will contain draft policies, having considered the results of the First Steps engagement. This will allow for further opportunities for consultation with people with protected characteristics and representative groups.
- 9.11 The Integrated Impact Assessment (IIA) Scoping Report (Appendix B), published alongside the consultation document, forms the initial stage of the IIA process which will ensure the impacts for sustainability, habitats, health and equalities are considered as required by legislation, policy and guidance. The IIA Scoping Report is therefore the initial stage of the equalities process which will be ongoing as the IIA is developed. It sets out a baseline of relevant data and information and provides the context and scope for the subsequent IIA report to be published alongside future iterations of the New Local Plan.
- 9.12 The IIA Scoping Report includes policy context, baseline and projections, health and equalities impacts and brief discussion of key issues, opportunities and objectives for the four priority areas of the Haringey Borough Plan 2019-2023 (People; Place; Housing; Economy). Paying due regard to equalities, the Scoping Report details key areas of concern for each of priority area before defining objectives for the IIA. In this way the IIA Scoping Report highlights

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

- 9.13 The Communications and Engagement Plan (Appendix C) describes how the consultation will allow the public to be involved with shaping the direction of the New Local Plan from the earliest opportunity. The plan sets an ambition to achieve a representative response. To do this it identifies a requirement to develop new approaches to target groups that are often underrepresented through consultation processes. These groups are: Young people; LGBT+; Disabled people; BAME; people with language barriers; Gypsies and Travellers. The Communications and Engagement Plan goes on to describe discrete strategies for communicating and engaging with each target group.
- 9.14 The Communications and Engagement Plan describes potential impacts on each protected characteristic and describes an ambition to ensure the views of people with protected characteristics are fairly reflected in the engagement process of the New Local Plan at an early stage. Specifically, it sets out steps to actively engage with younger people, make materials accessible to disabled people, improve the representation of minority racial groups who are poorly represented in similar engagements, promote engagement through religious organisations and actively seek involvement of LGBT+, disabled and religious groups.
- 9.15 In advance of policies being developed for the New Local Plan, the Communications and Engagement Plan specifically identifies a need for the engagement process to be representative, highlights groups that are traditionally underrepresented and sets out a plan to ensure the views and opinions of these groups are involved in the first stage of consultation. For example, this includes the provision of accessible documentation to people with sensory disabilities and exploring methods for effective communication with people who have English as a second language. In this way the Communications and Engagement Plan seeks to overcome barriers to engagement that traditionally prevent a representative sample, namely: language; accessibility; digital capability; limited communication of the ongoing consultation to all residents. These steps should help to mitigate the risk of an unrepresentative sample and will need to be revisited through the process to ensure success. The second stage of the consultation process, on the Draft Local Plan containing draft policies, will provide an important opportunity to deploy revised methods to ensure successful targeting of protected groups.
- 9.16 The New Local Plan has the potential to result in both negative and positive impacts for people with protected characteristics. By considering the equalities implications of policy development in each New Local Plan topic area, the IIA Scoping Report surfaces existing issues, risks and opportunities prior to the development of policy. The developing IIA will consider the impact on individuals with protected characteristics of developing policies on topics such as housing, health, air pollution and the environment, town centres and the local economy. Where potential negative impacts on individuals with protected characteristics are identified, it will be necessary to set out a strategy for

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

10 Use of Appendices

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

11 Local Government (Access to Information) Act 1985

[Haringey Local Plan \(July 2017\):](#)

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

[Intend to Publish London Plan \(December 2019\)](#)