

Planning Policy, Transport & Infrastructure

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



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

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

London Borough of Haringey

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

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

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

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

Housing land supply

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

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

Soundness test

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

Planning conditions

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

Mansard roof extensions

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

Energy efficiency improvements

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

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

Future changes to national planning policy

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

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

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

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

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

Conclusion

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

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

Yours faithfully



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

Chapter 3 – Providing certainty through local and neighbourhood plans

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

Yes

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

Yes

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

Yes.

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

No comment.

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

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

Chapter 4 – Planning for housing

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

No comment.

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

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

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

See answer to question 7.

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

No comment.

Chapter 4 – Planning for housing

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

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

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

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

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

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

No comment.

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

No comment.

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

No comment

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

No comment

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

No comment.

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

No comment.

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

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

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

No comment.

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

No comment.

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

No comment.

Chapter 5 – A planning system for communities

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

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

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

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

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

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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

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

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

None.

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

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

Chapter 6 – Asking for beauty

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Chapter 7 – Protecting the environment and tackling climate change

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

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

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

No comment

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

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

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

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

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

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

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

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

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

In general Planning policy could support climate change adaptation by:

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

Chapter 8 – Onshore wind and energy efficiency

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

No comment.

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

No comment.

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

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No comment.

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

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

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

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

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

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

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

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

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

No comment.

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

No comment.

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

No comment.

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

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

Chapter 10 – National Development Management Policies

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

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

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

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

No comment.

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

No comment.

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

No comment.

Chapter 11 – Enabling Levelling Up

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

No comment.

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

No comment.

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

No comment.

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

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

Chapter 13 - Practical changes and next steps

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

No comment.

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

No comment.