

Report for: Strategic Planning Committee, 10 September 2025

Item number:

Title: Approval to consult on Regulation 18 Draft Local Plan

Report authorised by: Barry Francis, Corporate Director of Environment & Resident Experience

Lead Officer: Bryce Tudball, Head of Spatial Planning

Ward(s) affected: All

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

1. Describe the issue under consideration

1.1 The Local Plan is the principal planning document for the Council which:

- Planning applications are determined in accordance with (unless material considerations indicate otherwise);
- Sets out a positive spatial strategy for development and land use across the borough;
- Reflects and supports the Council's broader corporate strategies and policies, including the Haringey 2035 Vision and the Place and Economy and Homes for the Future themes in the Corporate Delivery Plan 2024-2026; and
- Facilitates early and meaningful community engagement in the planning process.

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

- It remains a sound document for determining planning applications;
- It continues to align with the latest Council corporate vision, strategies, policies and aspirations; and
- It complies with legal and policy requirements for maintaining up-to-date Local Plans.

1.3 In March 2025, the Cabinet approved an updated Local Development Scheme (LDS), setting out a timeline to prepare a New Local Plan by 2027. The New Local Plan will replace the current suite of Local Plan documents adopted in 2017. The New Local Plan when adopted must:

- Have been prepared having regard to the new National Planning Policy Framework (NPPF) (2024);
- Be in general conformity with the London Plan 2021 and regard had to the emerging new London Plan;

- Include policies designed to secure that the development and use of land contribute to the mitigation of, and adaptation to, climate change;
 - Have been prepared having adhered to legal and policy requirements including a 5 Year Housing Land Supply.
- 1.3 Work on the New Local Plan began in 2020, starting with a “New Local Plan First Steps Engagement” consultation with residents, businesses and stakeholders. This early stage identified key issues and opportunities, such as how to accommodate growth and shape the borough’s future.
- 1.4 Feedback from that engagement with residents, businesses and stakeholders has informed the Draft Local Plan consultation document (Appendix B), which includes:
- A comprehensive vision and framework for delivering high-quality placemaking in the borough
 - An overall strategy for managing growth while protecting valued assets like open spaces, heritage buildings, and community facilities.
 - Draft planning policies; and
 - Proposed site allocations for future development.
- 1.5 As part of consultation on the Draft Local Plan residents, businesses, and stakeholders will be invited to provide detailed feedback on the policies and proposals.
- 1.6 Their input will help shape the next iteration of the New Local Plan called the ‘Submission Local Plan’ which the Council will seek to adopt following an independent examination of the said Plan by an inspector appointed by the Secretary of State.
- 1.7 Alongside the Draft Local Plan consultation document, the Council has prepared:
- a report summarising responses to the New Local Plan First Steps Engagement (Appendix A)
 - an Integrated Impact Assessment (IIA) (Appendix C). The IIA ensures that sustainability, environmental habitats, health, and equalities impacts are fully considered at each stage of the Local Plan process, in line with legal and policy requirements.
 - a comprehensive Communications and Engagement Plan to guide the delivery of a Draft Local Plan consultation which is consistent with the Haringey Deal (Appendix D)

2 Recommendations

- 2.1 That Strategic Planning Committee:

- 1) Consider all feedback received in respect of the New Local Plan First Steps Engagement consultation set out in Appendix A to this report;
- 2) Notes and comments on the Draft Local Plan consultation document attached as Appendix B to this report;
- 3) Recommends to Cabinet to approve for public consultation, in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012, the Draft Local Plan consultation document attached as Appendix B to this report;
- 4) Recommends to Cabinet that it delegates authority to the Director of Planning & Building Standards to agree the final version of the Draft Local Plan consultation document, and other supporting material to be produced for consultation including the Integrated Impact Assessment (IIA) in consultation with the Cabinet Member for Housing and Planning to the extent that any changes to the versions approved by Cabinet are not material changes and which could include changes to the text, layout and design of the Draft Local Plan consultation document and supporting documents and changes needed to clarify information or correct errors in the same.

3 Reasons for decision

- 3.1 A Local Plan is required to provide a robust planning framework for future development and land use in the borough that takes account of the National Planning Policy Framework and the London Plan, secures mitigation and adaption to climate change, and meets legal and policy requirements for the Council to have an up-to-date plan including a 5 Year Housing Land Supply. The Draft Local Plan Regulation 18 consultation document will provide the opportunity for residents, businesses and other local stakeholders to shape the policies, site allocations and strategy for meeting growth and need in the borough in the New Local Plan.

4 Alternative options considered

- 4.1 The alternative options considered are:

Do nothing / rely on the existing Local Plan (adopted 2017):

- This option was rejected as the current Local Plan does not reflect the Council's current strategic priorities and does not reflect changes in national and regional policy, including the National Planning Policy Framework 2024 and the London Plan 2021. Continuing to rely on the existing plan would risk planning decisions being challenged and reduce the Council's ability to shape sustainable and inclusive growth.

Delay consultation until further national or regional policy changes are finalised:

- While there is ongoing evolution in planning policy at the national and London-wide levels, delaying consultation would risk missing key milestones in the Council's adopted Local Development Scheme March 2025 and could result in the Council not having an up-to-date Local Plan in place by 2027. This would undermine the Council's ability to demonstrate a 5-Year Housing Land Supply and meet statutory requirements. Officers will work to ensure when preparing the plan that regard is had to future changes to national and London policy.

Undertake a partial review of the Local Plan rather than a full review:

- A partial review was considered but discounted. A comprehensive New Local Plan is necessary to ensure full alignment with the Council's updated vision and strategic ambitions and to provide a coherent and integrated planning framework. A partial review would not adequately address the scale of change required or provide the clarity and certainty needed for communities, developers, and decision-makers.

- 4.2 None of the alternative options presented are recommended, and thus undertaking the Regulation 18 Draft Local Plan consultation in line with the recommendations in this report should be progressed so that the Council has a New Local Plan in place which provides a robust planning framework for future development and land use in the borough, which reflects the Council's vision and needs for the borough and shaped by engagement with Haringey's communities to meet the legal and planning policy requirements that the Council needs to discharge.

5 Background information

- 5.1 The Local Plan is the Council's principal planning document which:

- Guides decisions on planning applications (unless material considerations indicate otherwise);
- Sets out a positive spatial framework for development and land use across the borough;
- Is a spatial expression of the Council's strategies and policies for meeting housing need in the Council's area and addressing other economic, social and environmental priorities as set out the Haringey Vision 2035.

- 5.2 It is important to keep the Local Plan up-to-date to:

- Provide a robust and lawful basis for determining planning applications;
- Ensure alignment with the Council's latest strategies, policies, and aspirations;
- Meet statutory and policy requirements for Local Plan review and renewal;
- Facilitate up-front community engagement in planning and shaping the borough.

National legislation, policy and guidance

- 5.3 The Government is committed to universal coverage of Local Plans across the country. In February 2025, the Minister of State for Housing and Planning, Matthew Pennycook MP, said:

Planning is principally a local activity. It is local plans that set out a vision and a framework for the future development of any given area, addressing needs and opportunities in relation to housing, the economy, community facilities and essential infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.

Local plans are the best way for communities to shape decisions about how to deliver the housing and wider development that their areas need and we know that areas with up-to-date local plans deliver more homes overall than those without one. For these reasons, the plan-led approach is, and must remain, the cornerstone of our planning system.

- 5.4 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) (December 2024) and
- National Planning Practice Guidance (PPG): Plan Making (June 2025).

- 5.5 Under the Planning and Compulsory Purchase Act 2004:

- Councils must keep their Local Plans under review (Section 17(6));
- Councils may revise their Local Plans at any time (Section 26(1));
- In preparing a Local Plan, Councils must have regard to national policies and guidance issued by the Secretary of State, the London Plan, and the resources available for implementation (Section 19(2)).

- 5.6 Local Plans must be reviewed at least every five years (Regulation 10A of the 2012 Regulations). 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. (paragraph 34)"

- 5.7 The NPPF is clear on the importance of plan-led development. Paragraph 15 states:

"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."

- 5.8 Paragraph 16 sets out that plans should:

- Contribute to sustainable development;

- Be aspirational yet deliverable;
 - Be shaped by early and effective engagement;
 - Contain clear and unambiguous policies;
 - Be accessible through digital tools;
 - Serve a clear purpose and avoid unnecessary duplication.
- 5.9 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 36):
- **Positively prepared** – i.e. seeking to meet objectively assessed needs including for housing;
 - **Justified** – i.e. taking into account reasonable alternatives and based on proportionate evidence;
 - **Effective** – i.e. deliverable and based on effective joint working on cross-boundary strategic matters; and
 - **Consistent with national policy** – i.e. in accordance with the NPPF.
- 5.10 Further national guidance on Local Plans is provided in the national Planning Practice Guidance (PPG) on Plan Making which was last updated on 26 June 2025. It provides detailed guidance on:
- Community engagement;
 - Evidence base requirements;
 - Sustainability appraisal;
 - Duty to cooperate;
 - Digital accessibility;
 - Implementation and monitoring.

New London Plan & regional policy

- 5.11 The Act states that Local Plans in London “must be in general conformity with” the London Plan (S24(1)).
- 5.12 The current London Plan was adopted in 2021. Since early 2025 the Mayor of London has started preparing a new London Plan. The timescales for this are set out below:
- **May 2025** – Towards a New London Plan document published for public consultation
 - **2026** – Draft London Plan consultation
 - **2026-2027** – Examination Process
 - **2027** – Adoption
- 5.13 The Towards a New London Plan consultation document published in May 2025 was a high-level direction of travel document, and as such did not contain detailed policies. It indicated that the new London Plan will include borough housing targets for a further 10 years. It is expected that Haringey’s future housing target will be higher than the current target of 1,592 homes per year having regard to the Government increasing by 33% the housing target for

London as a whole. Housing targets for individual boroughs will be apportioned through the new London Plan based on site availability and capacity.

- 5.14 In February 2025 the Mayor of London published the London Growth Plan setting out London's 10-year ambition for growth and the actions that will be taken to make it happen. While not a planning policy document, it nonetheless is an important reference point for the Council's New Local Plan. Of note, it highlights strategically important areas of housing growth in Wood Green and Tottenham and highlights Tottenham Hotspur as an international significant visitor destination that must be nurtured to drive further growth.

Existing Haringey Local Plan (2017)

- 5.15 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).**
- 5.16 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)** – adopted 2022;
 - **Highgate Neighbourhood Plan** – adopted 2017; and
 - **The London Plan** – adopted 2021, to be replaced by the new London Plan in late 2027.

New Haringey Local Plan

- 5.17 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 2027 and covering the period to 2042.
- 5.18 As the London Plan is part of the borough's statutory Development Plan, the New Local Plan does not need to duplicate policies in the London Plan which the Council is satisfied accords with its own objectives and aspirations.
- 5.19 However, many policies do require a locally-specific Haringey variation to ensure the borough's policies are compatible with the Council's wider corporate strategies and policies. These locally-specific policies require a robust local evidence base to justify a Haringey-specific approach, and these supporting evidence based documents will be published alongside the Draft Local Plan for consultation.

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, which is the current stage of Plan preparation, 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.

Timetable

- 5.22 The Act requires Local Plans to “be prepared in accordance with the Local Development Scheme” (LDS) (S19(1)).
- 5.23 The Council’s latest LDS was published in March 2025. Table 1 below sets out the LDS programme. The LDS will be updated at a later point to reflect the slight delay in carrying out Draft Local Plan consultation and to reflect progress towards Examination.

Table 1: New Local Plan timetable

Document	Regulation	Date in LDS
New Local Plan First Steps Engagement consultation	Regulation 18	November 2020 to February 2021
Draft Local Plan consultation	Regulation 18	July to September 2025
Proposed Submission Local Plan consultation	Regulation 19	May-June 2026
Submission & Examination	Regulation 22-25	July-November 2026
Adoption	Regulation 26	February 2027

New Local Plan First Steps Engagement consultation

- 5.24 Consultation on the New Local Plan First Steps Engagement document was launched on 16 November 2020 and closed on 1 February 2021. Over 10,000 comments were received from over 1,500 individuals and organisations.
- 5.25 The Planning Service won both regional and national awards for the consultation which was described by the Royal Town Planning Institute as an “imaginative, innovative, inclusive industry-leading approach to planning consultation.”

- 5.26 The feedback received is summarised in the First Steps Engagement Consultation Report (Appendix A). All feedback has been considered in the development of a Draft Local Plan together with key feedback received from other Council consultations including the Housing Strategy, Opportunity Haringey, Shaping Tottenham, Shaping Wood Green and the Parks and Greenspaces Strategy.

Draft Local Plan Regulation 18 consultation document

- 5.27 The New Local Plan Regulation 18 document has been prepared for consultation (Appendix A).
- 5.28 The document sets a placemaking framework and priorities for development and land use in the Borough, contains neighbourhood strategies to manage growth, contains detailed policies to manage development, and site allocations to manage development on key sites. The consultation seeks views on these strategies, policies and allocations and reasonable options available to the Council to improve them.
- 5.29 The Draft Local Plan focuses amongst other things on meeting housing need in the Council's area and addressing other economic, social and environmental priorities as set out in the Haringey Vision 2035 and the related six calls for action. Table 2 below gives an overview of the key sections and their content.

Table 2: New Local Plan Regulation 18 document – Overview

Chapter 3: Strategic Context and Opportunity	Sets out our strengths, challenges and opportunities. You can find out more detail by reading the accompanying Integrated Impact Assessment.
Chapter 4: Spatial Vision & Placemaking	Sets out the big spatial vision for Haringey
Chapter 5. Placemaking Framework	Sets out the Haringey Placemaking Framework to achieve the Council's spatial vision and an overarching placemaking policy to guide development and change in the borough in the future
Chapter 6: Spatial Strategy	Contains a strategy for land use and development in different parts of the borough to best achieve our vision through placemaking. This includes identifying focus areas, where there are greatest opportunities for us to work together to enhance and transform places for the better.
Part 2: Our Neighbourhoods Chapters 7 to 17	Contains visions, objectives, policies, and guidance for eleven identified neighbourhoods, as well as key sites with opportunities for enhancement or transformation (referred to as Site Allocations)

5.30 The Draft Local Plan repeats key themes throughout including:

- A Culturally Rich Borough; Embracing and supporting the heritage, creativity, and character of our diverse communities and environments to deliver places that are distinctively Haringey, and where everyone feels a sense of pride and belonging.
- A Greener, Cleaner, Safer Borough; A leader in addressing the climate emergency and ecological crises, while being good stewards of place, and ensuring everyone feels safe
- Homes for the Future; Delivering the high-quality and resilient homes we need for the future to ensure that everyone has access to a safe, stable, and affordable home, regardless of their circumstances
- Supporting us to Live Well; Delivering the infrastructure our people need to live healthy and happy lives and make a difference in their communities
- An Inclusive Economy; Supporting our local economies and high streets, and maximising employment and training opportunities
- Connecting to Opportunities; Improving active travel, public transport, and digital infrastructure so that people can easily and safely access the services and opportunities they need to reach their potential

Call for sites

5.31 As part of the consultation, the Council will also carry out a further 'call for sites' consultation, building on the previous one carried out in summer 2024. A 'call for sites' is a public invitation from a council asking landowners, developers, community groups, and individuals to suggest land that might be suitable for future development. 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

5.32 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 commissioned or produced the evidence base required to inform this Regulation 18 Draft Local Plan, and will continue to ensure additional evidence is produced where necessary to inform the Submission Local Plan and respond to any alternative evidence or proposals received through consultation. The documents include (non-exhaustive):

**Strategic Housing Market Assessment;
Strategic Housing Land Availability Assessment;
Employment Land Review / Need & Availability Study;**

Retail & Town Centres Needs Study;
Strategic Flood Risk Assessment (SFRA) Level 1
Affordable Workspace Study;
Sites of Importance for Nature Conservation Study;
Towards Net Zero Carbon Study;
Archaeological Priority Area Review;
Haringey Characterisation Study;
Tall Buildings Study Part 1;
Whole Plan Viability Assessment (including Affordable Housing); and
Infrastructure Delivery Plan (IDP).

Integrated Impact Assessment (IIA)

5.33 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 (Local Planning Authority’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)).

5.34 An Integrated Impact Assessment (IIA) is being prepared and updated alongside each iteration of the New 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.

5.35 Alongside the Draft Local Plan Regulation 18 consultation document, an Integrated Impact Assessment (IIA) Report has been prepared for consultation (Appendix C). The IIA Report forms the initial ‘Stage B’ 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, and an analysis of the Local Plan’s potential impacts on social, environmental and economic indicators, alongside equalities groups and protected environmental designations.

Consultation, engagement and the Haringey Deal

- 5.36 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
- 5.37 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.
- 5.38 Consultation of the Draft Local Plan will deliver on one of the Council commitments to change the way it works in the Haringey Deal as residents and communities will have an opportunity to have their say on a key document which is to be followed when taking decisions that may affect them.
- 5.39 To ensure residents, business and other local stakeholders can meaningfully shape policies, site allocations and placemaking in Haringey, the scale of the consultation is proposed to be very broad. It is proposed that The Draft Local Plan – Regulation 18 document and accompanying Integrated Impact Assessment (IIA) are published for public consultation for at least 8 weeks (2 weeks longer than the statutory 6 weeks). It is considered that this extra time is necessary to support effective engagement and ensure a robust and inclusive engagement is undertaken. Subject to Cabinet approval, the consultation will take place from the beginning of October 2025.
- 5.40 A comprehensive Communications and Engagement Plan has been prepared to ensure compliance with the Haringey Deal, SCI and support the objective of achieving effective, representative engagement with the public and key stakeholders (Appendix D). The Communications and Engagement Plan includes methods of resident participation from the "Inform", "Consult" and "Involve" categories in the Council's Participation Framework. Specific methods include:
- Local Plan branding;
 - Council website articles, banners and webpages;
 - Online questionnaire;
 - Social media;
 - In-person neighbourhood events
 - Microsoft Teams live events;
 - Press release;
 - Local newspaper notices;
 - Accessible/summary documents
 - Posters;
 - Haringey People & Haringey Extra articles;

- Haringey Business Bulletin;
- Emails/letters sent to those on the Planning Policy consultation database, Members, MPs;
- Copies of documents in local libraries;
- Agents Forum;
- Drop-ins and/or themed workshops;
- Translations
- Specific strategies for target groups including children and young people (e.g. Youth Panel); and
- Diversity monitoring.

6.41 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 continue to engage with prescribed bodies as part of the consultation on the Draft Local Plan Regulation 18 Engagement and on an ongoing basis as part of the plan-making process.

7 Contribution to Corporate Delivery Plan 2024-2026 High level Strategic outcomes

7.1 The independent Planning Service Peer Challenge report published in 2024 said “The Council’s new local plan will have the opportunity to be the spatial representation of the new council vision”.

7.2 The New Local Plan is cross-cutting and sets out a comprehensive placemaking framework for Haringey that contributes to the delivery of all six ‘Calls to Action’ from the Borough Vision. The Local Plan includes a spatial vision for the borough which is complementary to the Council’s overall vision for Haringey and which focuses on how development and land use change will secure positive placemaking outcomes.

7.3 The approval of the Draft Local Plan for consultation will help progress the New Local Plan towards adoption, which is listed as an activity in both the “Homes for the future” and “Place and economy” theme of the Corporate Delivery Plan 2024-2026.

7.4 The Draft Local Plan will support the delivery of the visions outlined in Shaping Wood Green and Shaping Tottenham as well as the following Council plans and strategies:

- Climate Change Action Plan 2021
- Walking and Cycling Action Plan 2022
- Housing Strategy 2023
- Parks and Greenspaces Strategy 2023
- Opportunity Haringey Inclusive Economy Framework 2023
- Health and Wellbeing Strategy 2023
- Culture Strategy 2024

- Transport Strategy 2025 TBC

8 Carbon and Climate Change

- 8.1 The Draft Local Plan seeks to deliver three overarching placemaking objectives, the third of which is: “a Sustainable and Resilient Place, with strong communities, a regenerating natural environment and on target to be net zero carbon by 2041”. To help achieve this the plan contains a substantially enhanced approach to reducing carbon and increasing sustainability. This approach is embedded throughout the entire plan and is supported by a new strategic policy requiring all development in the borough to achieve a Zero Carbon balance. To deliver this, proposals will be required to minimise embodied carbon emissions in accordance with a new Embodied Carbon Hierarchy, minimise waste by applying new Circular Economy Principles, and achieve net zero operational carbon by following a new Operational Carbon Hierarchy.

9 Statutory comments

Finance

- 9.1 The report seeks Cabinet approval to carry out public consultation on the Draft Local Plan Regulation 18 consultation document and delegated authority to the Director of Planning & Building Standards in line with the recommendations stated in section 3.1 of the Cabinet report.
- 9.2 The new Local Plan requires an ongoing budget for staff, evidence base and consultation costs which will be met within the Spatial Planning service budget and external funding.
- 9.3 In March 2025, the Council was awarded £227,962.50 from the Ministry of Housing, Communities and Local Government (MHCLG) to support the delivery of its New Local Plan. This is ringfenced to spend on the New Local Plan and will be used to fund additional officer resource to achieve the relevant milestones to deliver the Local Plan agreed by the Cabinet in March 2025.

Legal

- 9.4 The Director of Legal and Governance has been consulted in the preparation of this report. The legal requirements and Government planning policies/guidance to be followed/regard had to in respect of the preparation and consultation on the draft new local plan are stated in paragraph 6.4 of this report and compliance with the same explained in the remainder of section 6 of the report.
- 9.5 When a consultation has been undertaken the Council must take into account the representations received in response to that consultation when taking a decision. The consultation responses received in respect of the new Local Plan First Steps Engagement consultation are set out in Appendix A to this report and officers’ consideration of the same set out in paragraph 6.25 which must be taken into account before the decision whether to approve the draft new local

plan for consultation is taken. A judgment is to be exercised as to how much weight each representation should carry and whether or not to approve the draft new local plan in light of those representations.

- 9.6 The Courts have held that a decision maker must consider consultation responses with 'a receptive mind' and be prepared to change course if persuaded by a response, but is not under a duty to adopt the views of consultees.
- 9.7 The decision to approve the draft new local plan for consultation is an executive decision that can be exercised by Cabinet in accordance with the Council's Constitution.

Equality

- 9.8 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.
- 9.9 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.
- 9.10 The proposed decision is to approve for public consultation the Draft Local Plan Regulation 18 consultation document (Appendix B). This consultation document has been published alongside an Integrated Impact Assessment (Appendix C) and Consultation and Engagement Plan (Appendix D). 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.
- 9.11 This decision will allow for consultation to proceed on the Draft Local Plan: Regulation 18 consultation document (Appendix A), in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) (England) Regulations 2012.
- 9.12 The Integrated Impact Assessment (IIA) Report (Appendix B), published alongside the consultation document, forms the initial stages 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 Report is therefore an important stage of the equalities process which will be ongoing as the IIA is developed ahead of a submission Local Plan being finalised. It sets

out a baseline of relevant data and information, and an analysis of policies impacts.

- 9.13 The IIA Report includes policy context, baseline and projections, health and equalities impacts and brief discussion of key issues, opportunities and options. Paying due regard to equalities, the Report details key areas of concern for each of priority area before defining objectives for the IIA. In this way the IIA Report highlights existing inequalities and describes potential areas of work whereby the Council can tackle these 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.
- 9.14 The Communications and Engagement Plan (Appendix D) describes how the consultation will allow the public to be involved with the continued shaping of the New Local Plan. 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.
- 9.15 The New Local Plan has the potential to result in both negative and positive impacts for people with protected characteristics. The IIA considers 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 sets 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

11 Background papers

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

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

[London Plan 2021](#) (March 2021)

[Local Development Scheme](#) (March 2025)

[Haringey 2035: Our Vision](#) (October 2024)

[Haringey Corporate Delivery Plan 2024-2026](#) (July 2024)

