

Part 3 Thematic Policies

18. Design

Introduction

- 18.01 Good design is fundamental to delivering high quality placemaking in Haringey. The NPPF recognises good design as a key aspect of sustainable development, creating better places in which to live and work and helping make development acceptable to communities.
- 18.02 The London Plan requires all development to make the best use of land by following a design-led approach. This requires consideration of design options to determine the most appropriate form of development that responds to a site's context, existing and planned supporting infrastructure and capacity for growth, to determine the appropriate form and density of development. A design-led approach to optimising sites should be followed for all scales of development, including smaller sites, to preserve and enhance the character of our neighbourhoods while optimising growth.
- 18.03 Good design requires a holistic approach that balances social, economic and environmental factors, including fostering nature recovery and taking a conservation-led approach to placemaking. It is a deliberate and iterative process that requires research, consultation, and creativity to identify and achieve the outcomes that best meet the needs of the community.
- 18.04 As a Council we take proactive steps to ensure that excellent design standards are upheld in Haringey, including through the publication of detailed design guidance, such as the Bruce Grove Conservation Area Design Guide. Haringey's independent Quality Review Panel provides additional expert support to inform the planning process both before and after applications have been submitted. The Council also runs the Haringey Design Awards, celebrating and encouraging thoughtful and creative approaches to design in the borough. Further detailed guidance and design codes will be published following publication of this Local Plan, to support good design in the borough.
- 18.05 The NPPF sets out that local plans should set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable. This chapter sets out what good design is for Haringey, including principles, considerations, criteria, standards and processes that should be followed.

Policy D1: Haringey Design Principles

- A. All proposals must achieve good design and contribute to the distinctive character and amenity of the local area. The Council will support proposals developed through a design-led approach which are consistent with the following design principles:
- (1) **Prioritise climate resilience** – by beginning the design process with the sensitive placement and orientation of buildings within a high-quality, biodiverse landscape, to ensure well-integrated and resilient public and private amenity spaces.
 - (2) **Respond positively to context** – responding sensitively to the proposal's context, enhancing the surroundings to create a strong sense of place and identity and taking a 'retrofit first' approach, in accordance with policy CE2.
 - (3) **Provide a healthy environment** – creating places that support physical and mental wellbeing and restore the natural environment.
 - (4) **Support inclusion and diversity** – creating welcoming places that promote safety and facilitate social integration, while addressing the evolving day-to-day needs of Haringey's diverse communities, regardless of disability, age, gender, sexual orientation, socio-economic status, race or faith, in accordance with policy D3.
 - (5) **Connect communities** – creating connected places that are legible and easy to safely navigate between.
 - (6) **Be integrated and functional** - designing places that are well-organised so that people can easily access and use amenities and services, minimising clutter while supporting cohesive neighbourhoods with an appropriate mix of tenures.
 - (7) **Be Zero Carbon** – minimising carbon emissions through high-quality, passive design and using resources efficiently, including beyond a building's lifespan following principles outlined in policy CE1.
 - (8) **Be designed to last** - creating development that can adapt to a changing climate and is robust and easy to maintain.
- B. Proposals must be designed in accordance with adopted design guides and/or codes, where these apply.

18.06 This policy contributes to the Haringey Placemaking objectives as follows:

A SUSTAINABLE & RESILIENT PLACE

Delivering energy efficient developments that support sustainable transport and provide public spaces which facilitate social integration

A HEALTHY & SAFE PLACE

Delivering high quality and healthy developments which promote quality of life including incorporating green infrastructure and recreational areas that support physical and mental wellbeing

Preventing crime and promoting a sense of safety via design of development and public realm

A FAIR PLACE

Ensuring accessibility for all residents and foster social equity

Supporting Text

Prioritising climate resilience

18.07 In the face of the escalating impacts of climate change, it is crucial that new development prioritises climate resilience through thoughtful and sustainable landscape design. In the past, outdoor amenity and landscaping have often been regarded as a low priority by developers, with early-stage design ambitions diminished at a later stage in the development process as part of ‘value-engineering’ cost savings.

18.08 Good landscape design is not only about incorporating biodiversity through planting and trees. It also means beginning the design process with the sensitive orientation and placement of buildings to ensure that designs are rooted in and work in harmony with the natural environment. As such, consultant teams should include landscape architects from an early stage in the design process to ensure that proposals are informed by specialist expertise.

18.09 The design and management of the landscape plays a vital part in mitigating and adapting to climate risks, such as flooding, heat stress, and biodiversity loss. By integrating climate-resilient strategies, we can improve the mental and physical well-being of residents while supporting long-term nature recovery initiatives in Haringey.

Responding positively to context

18.10 Part of what makes Haringey great is its unique and diverse communities and neighbourhoods. Proposals must demonstrate an understanding of the immediate, local and regional context of development sites, having regard to Haringey’s Urban Character and Placemaking Study and adopted design guides and/or codes where these apply. Context includes socio-economic, cultural and environmental characteristics as well as built form.

- 18.11 Conservation-led placemaking takes a strategic approach to preserving and enhancing the significance of the historic environment. This approach recognises the value of Haringey's built heritage by embracing opportunities to conserve or restore heritage assets and their setting as an integral part of new development. Proposals should follow the principles of Historic England's "Constructive Conservation" method, taking a positive and collaborative approach to managing change in historic places while reinforcing their significance and ensuring their continued use and enjoyment.
- 18.12 Conservation-led placemaking is fundamental to the Council's placemaking strategy, including where conservation areas overlap with our Placemaking Focus Areas. It is particularly important within the small number of conservation areas currently on the Heritage at Risk register.
- 18.13 The Council has been very active in conservation-led placemaking, particularly in the east of the borough where more heritage assets are identified as being at risk. Successful funding bids have supported several heritage and conservation projects. These include the North Tottenham Townscape Heritage Initiative to restore historic buildings in North Tottenham, and the Tottenham High Road Heritage Action Zone to unlock the economic potential of the Bruce Grove Town Centre through heritage.

Provide a healthy environment

- 18.14 Our natural environment contributes to the quality of a place and the wellbeing of people that live within it. Proposals should respond positively to our valued natural features and open spaces, maximising opportunities to restore nature, enhance biodiversity, and integrate green and blue infrastructure within their design. Proposals should also consider the impact of design on the physical and mental wellbeing of prospective users. This could mean designing in access to open and green spaces to support physical activity or provide a calming escape from urban life or ensuring indoor and outdoor environments are comfortable and inviting for people to use even during extreme weather events such as heat waves, having regard to Haringey's Climate Adaptation policies.

Support inclusion and diversity

- 18.15 Inclusive design is vital so that our environment enables everyone to participate equally, independently, and confidently in everyday activities, regardless of disability, age, gender, sexual orientation, socio-economic status, race or faith. An important part of inclusive design is listening to our communities and working collaboratively with local people to ensure that their diverse needs are met in accordance. Policy D3 sets out detailed policy requirements relating to Inclusive Design.

Connect communities

- 18.16 Well-designed places allow everyone to access and enjoy spending time in them, as well as easily navigating and moving through them. A key part of this involves reducing criminal opportunities and promoting a sense of safety with a focus on helping eliminate violence against women and girls. Proposals must ensure that

movement and access is safe, easy and sustainable, routes to destinations are legible and that the public realm supports activity, positive social interaction and a healthy lifestyle. Our public spaces are particularly important for bringing people together and supporting culture and community.

Be Zero Carbon

- 18.17 Proposals must take an ambitious and holistic approach to minimising carbon emissions that is embedded into the design process from the very earliest stages, in accordance with Haringey's Climate Emergency & Buildings policies. Proposals should embrace 'zero carbon design' from the outset to ensure that every available opportunity to reduce the carbon footprint of the development is taken, rather than providing a sustainability strategy that is 'added-on' after designs have been developed.

Be integrated and functional

- 18.18 The layout and design of places and buildings should be carefully considered to ensure the best use of available space, thinking about the activities they are designed for and how they can be made easier, safer, and more enjoyable.
- 18.19 Amenities should be well-integrated within designs so that streets are well-ordered and free from clutter, allowing efficient access for services with minimum disruption to the quality of the pedestrian experience and daily activities in the public realm. Indoor and outdoor circulation should be optimised to enhance the experience of moving within and around proposals, avoiding long corridors and 'dead ends'.
- 18.20 Proposals should thoughtfully and efficiently integrate building services equipment to avoid compromising the appearance of a building, including the appearance from long views, while maximising opportunities for renewable energy technologies.

Be designed to last

- 18.21 Proposals should use attractive, durable, high-quality materials which complement local character. They should also be designed to be climate resilient and weather well over the building's lifetime, ensuring ease of maintenance and avoiding staining on building facades. Generally, rendered facades and timber external cladding will not be supported where they would require significant maintenance to prevent staining caused by weathering and air pollution.

Design guides and codes

- 18.22 The National Planning Policy Framework sets out that to provide maximum clarity about design expectations local planning authorities should prepare locally-specific design guides or codes consistent with the National Design Guide and the National Model Design Code. To enhance local character and provide a framework for creating high-quality places the Council will bring forward area-wide, neighbourhood or site-

specific scale design guides and codes as supplementary planning documents. This will include a revised and updated approach to upwards extensions having regard to explicit support in the NPPF for upwards extensions and feedback from local communities on the existing South Tottenham House Extensions SPD (Supplementary Planning Document).

Policy D2: Design-led Approach and delivering Design Quality

Design-Led Approach

- A. All proposals must be developed through a design-led approach seeking to deliver the most appropriate and optimal form and land use for the site in accordance with the London Plan.
- B. Proposals should provide a clear design vision and establish appropriate site-based design parameters to implement it, having regard to:
 - (1) the Haringey Design Principles in Policy D1
 - (2) the site's context, demonstrated through a robust site appraisal that identifies key opportunities and constraints, including opportunities to support nature recovery and enhance climate resilience;
 - (3) Haringey's retrofit-first approach, having regard to policy CE2;
 - (4) existing and emerging planning policies, guidance and design guides and/or codes
 - (5) feedback from residents and other stakeholders via engagement and consultation
 - (6) infrastructure needs
 - (7) the Council's Character and Placemaking Study, and
 - (8) placemaking aspirations for the site and wider area as identified in the Local Plan and other relevant placemaking documents

Responding to context

- C. All new development must contribute positively to the distinctive existing and emerging character, context, and amenity of the local area. The Council will support proposals which respond positively to:
 - (1) The natural environment, prioritising opportunities to integrate landscape, support nature recovery and enhance climate resilience, having regard to:
 - a Landform;
 - b Topography, ground level and gradient;
 - c Natural features and other open spaces;
 - d Blue and green infrastructure;
 - e Trees on and close to the site;
 - f Landscaped boundaries and treatments; and
 - g Any other significant biodiversity (including prioritising native over invasive species) on or close to the site;
 - h Opportunities for biodiversity net gain;
 - i Flood risk;
 - j Air quality; and
 - k Land contamination
 - (2) The urban character of the site and its surrounds, having regard to:
 - a Building heights;
 - b The historic environment and protected views;
 - c Urban grain, form, scale & massing prevailing around the site;

- d Legibility and the framework of routes and spaces connecting locally and more widely;
 - e Sense of enclosure;
 - f Rhythm of any neighbouring or local regular plot and building widths;
 - g Active, lively frontages to the public realm; and
 - h Distinctive local architectural styles, detailing and materials.
- (3) On-site and neighbouring uses, activities, and amenity, having regard to cumulative impacts, including:
- a ensuring an appropriate amount of amenity and privacy for existing and/or future residents and neighbouring properties, minimising overlooking;
 - b providing appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land, limiting overshadowing; and
 - c addressing issues of vibration, noise, fumes, odours, light pollution, overheating and microclimatic conditions likely to arise from the use and activities of the development.
- (4) Opportunities to improve connectivity, permeability, and access to local services for all, providing direct, safe and easily recognisable routes).
- a Existing and future infrastructure needs, making efficient use of land and having regard to the Infrastructure Delivery Plan.
 - b Opportunities to support social cohesion, local identity and sense of place, enhancing the local cultural context.

D. Proposals must be supported by Masterplans where required by Policy D8.

Delivering design quality on site

- E. All elements of proposed building designs must be demonstrably deliverable. Proposals which are considered likely to result in ‘value engineering’ approaches that detract from design quality will be resisted.
- F. All elements of proposed building designs must be demonstrably deliverable. Proposals which are considered likely to employ ‘value engineering’ approaches, which dilute the design quality of approved proposals and often make developments difficult to maintain, will be resisted.
- G. Where architects have only been appointed for partial services, design quality should be maintained by retaining the original design team to monitor the design quality of the development through to completion.

Supporting text

The Design-Led Approach

- 18.23 All proposals must demonstrate how they have been developed through a design-led approach to optimise site-capacity.

- 18.24 The starting point for a design-led approach is undertaking a thorough site appraisal (sometimes known as a site analysis) which surveys and evaluates the existing characteristics of a site/building and its surroundings. Analysis should be undertaken having regard to planning policies, guidance and design guides and/or codes.
- 18.25 A clear design vision should be developed which responds to all relevant considerations including placemaking aspirations for the site and wider area as set out within neighbourhood policies of the Local Plan and within Neighbourhood Plans where these exist. Where relevant, applicants should also have regard to placemaking aspirations expressed outside the Local Plan in strategic documents such as Shaping Wood Green and Shaping Tottenham.
- 18.26 Site-based design parameters should be developed setting out how the design vision is proposed to be implemented. Where appropriate, these will be expected to address land use, built form, built identity, public realm, movement, and green and blue infrastructure. Land use parameters include defining the mix and location of uses. Built form parameters include defining block types, building lines and heights. Built identity parameters include defining materiality, window sizes, detailing, roofscape and how the building meets the ground. Public realm parameters including defining the type and location of any new streets or areas of public realm. Movement parameters include defining movement routes and hierarchy, points of access and connection to the wider street network. Green and blue infrastructure parameters include defining any green and blue infrastructure proposed on the site and how this connects to wider identified networks.
- 18.27 For major developments and on more complex schemes falling below this threshold, justification should be provided for why the preferred design solution was selected, with an observable evolution of proposals, including consideration of alternative design options provided with proposals. Consistent with the Policy CE2, proposals for development on sites with existing buildings must take a 'retrofit first' approach, evidencing that reuse and retrofit design options have been considered from the earliest design stage.
- 18.28 Where design visions and site-based parameters are already set out in site allocations, these should be clarified and expanded on in greater detail in the Design & Assessment Statement. Site-based parameters should be illustrated clearly, both graphically and numerically. They should also incorporate the wider context, particularly where the site is within a placemaking focus area. The scope and level of detail required will depend on the characteristics, location and scale of the proposal.
- 18.29 Compliance with each component of the design-led approach should be set out in the Design & Access Statement. Design & Access Statements should be supported by clear drawings and images. 3D visualisations are encouraged for minor development proposals and are required for major development proposals. Drawings and images must include the immediate surrounding context so that proposals can be clearly understood in context.

Responding to context

- 18.30 All proposals must demonstrate how they have responded to its context. Part B of Policy D2 sets out elements of character that should be considered as part of a site appraisal. The site appraisal should reference and build on the Council's Character and Placemaking Study. The scope and level of detail required as part of the site appraisal will depend on the characteristics, location and scale of the proposal.
- 18.31 Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours and should be designed to ensure there are no significant adverse impacts on the amenity of any existing occupiers and neighbours. The cumulative impacts of development proposals on amenity will be considered in assessing their acceptability.
- 18.32 Amenity can be compromised in a number of ways through development such as detrimental loss of daylight and sunlight to existing and adjacent occupiers; loss of privacy and outlook due to the proximity and design of developments; harmful noise, odour, vibration and air pollution from existing and proposed developments (typically commercial activities and other activities such as rail); developments with the potential to endanger highway safety; and cause detrimental micro-climate effects. Buildings should therefore be compatible with their local environment and conditions.
- 18.33 The design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings and ensure that adjoining land or properties are protected from unacceptable overshadowing. The Building Research Establishment (BRE) provides guidance on site layout planning to achieve good sun-lighting and day-lighting (BRE Site Layout Planning for Daylight and Sunlight: a guide to good practice, 2022). The guidance includes advice on site layout to provide good natural lighting within new development, safeguarding of daylight and sunlight within existing buildings nearby, and the protection of daylighting of adjoining land for future development. It also includes guidance on the loss of solar radiation for solar panels and passive solar buildings that use the sun as a source of heating energy.
- 18.34 Proposals should not cause an unreasonable sense of enclosure or disproportionate overshadowing on neighbouring sites and should be consistent with BRE guidance and with British Standard BS EN 17037 'Daylight in buildings'.

Delivering design quality on site

- 18.35 'Value engineering' is common practice in the UK construction industry. The term is used to describe a cost-saving exercise that often takes place after planning permission has been granted, where the contractor or developer will seek to make cost savings by down-grading the specification of proposals, such as through the selection of cheaper materials and products. Value engineering often significantly diminishes the design quality of proposals. The practice of value engineering was also

heavily criticised in the Hackitt review of the building regulations and fire safety after the Grenfell tragedy. The review identified value engineering as a key contributing factor in the Grenfell fire, as cladding materials that were originally specified were later replaced with a cheaper product that was unfit for purpose as a result of a value engineering exercise.

- 18.36 London Plan Policy D4 encourages local authorities to require the retention of architect and landscape architect services (this is often referred to as an ‘architect retention clause’) to secure ongoing design monitoring for new development.
- 18.37 The Council will secure the design team’s ongoing involvement through Section 106 or planning condition where appropriate, to support maintaining design quality throughout the development process.
- 18.38 Applicants should refer to the GLA’s Architect Retention & Design Monitor Roles Process Note for further guidance regarding design quality and the retention of architects and landscape architects to secure high-quality design outcomes.

Policy D3: Inclusive Design

- A. All proposals must achieve the highest standards of inclusive design by:
 - (1) placing people at the heart of the design process, through early and ongoing engagement;
 - (2) making places feel safe and welcoming, particularly from the perspective of women and girls and gender diverse people;
 - (3) incorporating measures that design out crime, having regard to the principles set out in the Metropolitan Police's 'Secured by Design';
 - (4) ensuring that all development, including social and community infrastructure, shops and public transport, can be entered, accessed and used safely, easily and with dignity by all, accommodating diverse needs;
 - (5) incorporating safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- B. Design and Access Statements should include an Inclusive Design Statement demonstrating compliance with part A above.

Supporting Text

- 18.39 Inclusive design acknowledges diversity and difference and is guided by lived experience, placing people at the heart of the design process. It aims to create environments that everyone can use by eliminating barriers that cause unnecessary effort and exclusion, allowing all individuals to engage in daily activities equally, confidently and independently.
- 18.40 Inclusive design is fundamental to achieving A Fair Borough and should be considered from the start of the design process so that everyone can enjoy an equitable environment, regardless of disability, age, gender, sexual orientation, socio-economic status, race or faith.
- 18.41 A high quality, inclusive and accessible environment enhances the quality of life for residents and visitors. It allows people to move around easily and enables residents at all stages of life to remain within the local area as part of the community, including families with small children, older people living by themselves and those with mobility impairment.
- 18.42 When properly implemented, accessible and inclusive neighbourhoods enable people to remain independent and economically active for longer, reducing the need for extensive adaptations to buildings to meet the needs of existing and potential future users.

People at the heart of the design process

- 18.43 The best way to achieve inclusive design is to involve as many people as possible in the design process. The Council expects applicants to demonstrate that they have taken a proactive and meaningful approach to engaging with potential users or user groups, existing residents, neighbourhood forums, adjacent landowners, community groups and other local stakeholders to ensure that proposals respond appropriately to local needs and are informed by lived experience so that proposals create places that are welcoming and inclusive for all. In particular, the Council expects applicants to demonstrate how they have proactively engaged with seldom heard groups, including women and girls and gender diverse people. The Council's Statement of Community Involvement contains more detail on engagement expectations.

Safe and welcoming places

- 18.44 Feeling safe is an essential component of inclusive design. As such, is particularly important to consider the perspective of women and girls and gender diversities as part of the design process, as they consistently report¹ higher levels of fear and perceived danger in public places, compared to men, especially at night and in areas like parks and open spaces.
- 18.45 For major development and developments proposing meanwhile uses, the use of exploratory walks or participatory site assessments as part of engagement with the local community is strongly encouraged. To be most effective, these should seek to provide a range of opportunities targeted at different sections of the community that may have particular knowledge and concerns about the area (for example, women and girls focus group, or disability walking tour), alongside mixed group engagement.
- 18.46 Inclusive public realm design should be achieved by taking a 'child-friendly' approach, having regard to policy D4. Child-friendly design and urban planning goes beyond designated playground provision and considers the design of public spaces and physical features around and between buildings in our neighbourhoods, contributing to a more accessible and welcoming public realm for all.
- 18.47 Where used, language and visuals should be clear and easy to understand. Information on signage, maps, and guides should be provided in various formats. This approach benefits everyone, including tourists and individuals with learning or visual impairments. Embracing familiar names, landmarks and local histories can enhance legibility and make places easier to navigate, while enhancing a sense of belonging. Integrating art and cultural elements that reflect the diversity of the community can also make spaces feel more welcoming.
- 18.48 Developments should optimise opportunities for social integration by creating accessible and inclusive communal public areas, offering diverse housing options, and enabling and facilitating community activities and events.

¹ [ONS – perceptions of personal safety and experiences of harassment, 2022](#)

Designing out crime

- 18.49 The design and layout of proposals can help to reduce crime through encouraging increased activity, passive surveillance, ease of access, and creating a sense of ownership. Appropriate lighting is also crucial as it enhances visibility, deters crime, and promotes a sense of safety in public and private spaces. Proposals will be assessed against the principles of 'Secured by Design'. The latest published guidance in this respect should be referred.

Access and Use

- 18.50 Proposals should demonstrate how all users, regardless of their protected characteristics, are able access, move through and use spaces. This includes:
- Implementing universal design with features like tactile paving, wide doorways and step-free entry.
 - Providing infrastructure that supports access and use for all, such as blue badge parking, accessible cycle parking, accessible toilets, and places to sit and rest.
 - Facilitating connections to the wider neighbourhood, in particular key infrastructure and services like social infrastructure, public transport and local shops.
 - Ensuring the means of access is convenient and able to be undertaken independently without undue effort, separation or special treatment. Entrances should be easily identifiable.
 - Providing accessible housing in accordance with housing design policy D11
- 18.51 Early and careful consideration should be given to inclusive design when dealing with historic buildings and heritage access to secure schemes that encourage use and enjoyment of the historic environment while preserving an asset's significance.
- 18.52 Developments should be convenient and welcoming for all, with no disabling barriers, providing independent access without additional undue effort, separation or special treatment for those with mobility impairments.
- 18.53 Further guidance on inclusive design standards can be found in the following British Standard documents:
- BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018.
 - BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018.

Inclusive emergency evacuation

18.54 Buildings should be designed and built to accommodate robust emergency evacuation procedures for all building users, including those who require level access. All building users should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up mechanical devices or similar interventions that rely on manual handling are not considered to be appropriate, for reasons of user dignity and independence. The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. The fire evacuation lifts and associated provisions should be appropriately designed, constructed and include the necessary controls suitable for the purposes intended.

Inclusive Design Statements

18.55 Inclusive design statements should demonstrate that the highest standards of inclusive design will be achieved. Where appropriate, these will be expected to:

- Explain the design concept and illustrate how an inclusive design approach has been incorporated into this;
- Detail which best practice standards and design guidance documents have been applied in terms of inclusive design;
- Demonstrate that potential impacts on people and communities who share a protected characteristic have been considered;
- Include records of any exploratory walks or participatory site assessments undertaken and explain how the proposals respond positively to the findings;
- Set out how access and inclusion will be maintained and managed, including fire evacuation procedures; and
- Detail engagement with relevant user groups, such as children and young people, disabled or older people's organisations, or other equality groups.

18.56 Where specific inclusive design measures cannot be directly delivered as part of the proposed development but are related to it, a planning obligation may be used to secure those measures or financial contributions towards delivery of specific relevant measures or projects.

Policy D4: Public Realm

- A. Proposals enhancing existing public realm or expanding or creating new areas of public realm should:
 - (1) be informed by detailed site analysis which identifies existing and proposed uses, demonstrating the potential public benefit of proposals. This analysis should be included within Design and Access Statements;
 - (2) take opportunities to increase biodiversity and support climate resilience;
 - (3) enhance green and blue infrastructure in accordance with the Green and Blue Infrastructure principles in policy G1.
 - (4) be welcoming, inclusive and accessible to all, clearly communicating that the space is publicly accessible;
 - (5) contribute positively to sense of safety in public places, having particular regard to the perspective of women, girls and gender diverse people, and consistent with policy D3;
 - (6) embed playable spaces into streets and public spaces, allowing children to easily access a range of play opportunities suitable for a range of ages;
 - (7) incorporate inclusive wayfinding and provide legible routes to support inclusive access;
 - (8) take opportunities to reduce sensory overload and accommodate people with neurodiversities in public spaces;
 - (9) encourage and facilitate activities that support social integration and mental and physical well-being;
 - (10) foster a sense of belonging and local identity;
 - (11) contribute to reducing crime and improving safety through good design and well-integrated lighting strategies, in accordance with policy D3;
 - (12) use high-quality, robust materials that are easy to manage and maintain;
 - (13) enhance connectivity and support active travel, in accordance with policy T1;
 - (14) contribute to town centre activation, in accordance with policy TC5;
 - (15) design public toilets to be inclusive, accessible and safe to use; and
 - (16) provide infrastructure to support cultural activities including public events, where appropriate.
- B. Proposals that will impact detrimentally on the operation or environment of the public realm will be resisted.
- C. Privately owned public spaces within new development must appear and operate indistinguishably from public space. Proposals must provide detailed management plans demonstrating how they will be positively managed and maintained to a high standard.
- D. Major development proposals should consider how to enhance local distinctiveness and legibility through the use of public art.

Supporting text

Public realm criteria

- 18.57 High-quality public space is crucial to placemaking and has a wide range of benefits including to community cohesion and to the local economy. The enhancement or expansion of existing public realm or the creation of new public realm will be supported where this meets the criteria outlined in this policy, having regard to the Haringey Streetscape Design Guide 2023.
- 18.58 Proposals should seek to identify and address existing and future deficiencies in the quality and quantity of public realm and, where possible, locate public realm adjacent to social, cultural, blue and green infrastructure where this would contribute to greater public use and benefit from those assets.
- 18.59 Applicants are encouraged to be creative in identifying opportunities for new and enhanced public realm, including on podiums or roof tops and through the redevelopment of surface carparks and underused or vacant spaces.

Site analysis

- 18.60 The design of new or enhanced public realm should be informed by an analysis of how the spaces is currently used or proposed to be used and the intended function and benefit of it. where appropriate, this should be informed by engagement with local communities and other key stakeholders. The design should seek to optimise the use and benefit of the space throughout different periods of the day, week, and year.

Supporting climate resilience

- 18.61 Public realm proposals should incorporate nature-based solutions that contribute to climate resilience. The landscape must be functional as well as beautiful; performing environmental functions including air and water filtration, urban cooling and flood and wind mitigation. Biodiversity should be encouraged at every opportunity and scale to form a ‘mosaic’ of habitat types, based on planting and habitat features. Tree-lined streets that support local biodiversity will be encouraged.

Inclusive access

- 18.62 Public realm should be safely and easily accessed and used by everyone, irrespective of age, mobility impairments, gender or religion, providing equitable places that can be enjoyed by all of Haringey’s diverse communities.
- 18.63 Proposals should adopt a gender-inclusive approach to design, incorporating measures to prevent violence against women and girls and gender diverse people that respond to feedback gathered through engagement with the local community. Gender-inclusive design should be informed by the lived experience of local people

who will use or move through these places. The use of exploratory walks and or participatory site assessments to inform designs is strongly encouraged.

18.64 As part of ensuring inclusion and accessibility, the following measures should also be considered:

- providing dropped curbs and widening pavements where possible
- responding to desire lines within and across the site, and clearly identify where different transport modes and rights of way are prioritised
- providing clear wayfinding.
- having prominent and direct entrances and key route to and through the space
- avoiding vehicle dominance in and around public space and minimise street parking;
- providing secure cycle parking in locations where people are encouraged to dwell and/or access nearby activities
- planting should be used at important thresholds to create hierarchy and soften the transition between public and private spaces
- trees should be grouped to reinforce routes through neighbourhoods, maintaining visibility, safety and legibility.

18.65 Wayfinding is often a multi-sensory activity and can be particularly challenging for people with sensory processing differences or sensory loss. Inclusive wayfinding delivers information through multiple channels to accommodate diverse needs, including users with sensory loss. This could include visual clues such as:

- landform, architecture or graphics and visual displays;
- tactile elements such as braille or tactile paving surfaces;
- audible elements such as announcements;
- other sensory information, such as olfactory (for example using scented plants); and
- simple language formats and British Sign Language (BSL).

Accommodating neurodiversities in the public realm

18.66 Proposals should incorporate peaceful spaces into design, including gardens, water features or quiet areas to allow people, to relax and escape sensory overload, having regard to (PAS) 6463 'Design for the mind', which provides guidance on how the built environment can accommodate people who are neurodiverse.

Embedding 'playable' public realm

18.67 Embedding playable spaces into the landscape and public realm helps to create safe and stimulating environments for people of all ages.

18.68 All play provision should be considered as an integral part of a holistic 'playable' public realm strategy, providing opportunities for incidental play that is suitable for a

range of ages and abilities accommodated beyond dedicated play areas. Proposals must be bespoke to their environment and should not rely on ‘off-the-shelf’ play equipment. Youth play should be integrated within dedicated play spaces.

18.69 Public spaces and streets should be considered together to create a network of playable spaces, allowing children to easily access a range of play opportunities. Play spaces should be well overlooked and provide good seating provision for adults supervising children. Dedicated play areas must be safe, accessible and located away from traffic and parking within areas which have favourable microclimatic conditions.

18.70 Planting should also be an integral part of the play offer, adding colour, texture, smell and seasonality, encouraging children to engage with their environment. Opportunities should also be sought to integrate play and artists commissions to heighten the play experience and create dynamic and inspiring places for both children and adults to enjoy.

Social integration and well-being

18.71 Space should be designed to support positive activities and to support the mental and physical health of communities. Opportunities should be taken to provide:

- robust and low-maintenance seating,
- drinking water facilities;
- facilities for free outdoor exercise; and
- free, unisex accessible public toilets and baby change facilities, suitable for a range of users including disabled people, families with young children and people of all gender identities in accordance with policy D3.

18.72 Landscape design should be structured and layered to optimise enjoyment in all seasons. Species should be carefully selected to encourage residents and visitors to engage with the environment throughout the year. Place-specific planting strategies should be developed, enhancing and intensifying existing planting to create rich, biodiverse and inspiring landscapes. Opportunities include changing colours and textures, and supporting health and wellbeing, for example through home growing.

Enhancing local identity and sense of belonging

18.73 Applicants should take opportunities to create a sense of place and identity by referencing and communicating the borough’s diverse history and cultural context through design, particularly celebrating under-represented histories.

18.74 Proposals should also embrace opportunities to preserve and enhance existing local character and landmarks, for example through lighting, public art, signage, paving, materials, and views, to aid navigation.

Reducing crime and improving safety

- 18.75 Proposals for public realm must demonstrate how Designing Out Crime principles have been applied. Proposals should include security measures that are visible where appropriate but do not dominate the space and are not detrimental to its character. They should not rely on physical barriers or CCTV as the primary way to make the public realm safe.
- 18.76 Spaces should be well-lit to encourage activity and increase confidence and public perceptions safety, while minimising light pollution. To support successful implementation, Design and Access Statements should include lighting strategies that demonstrate a thoughtful and refined approach to integrating lighting that enhances the identity of new public realm and increases safety, while also giving due consideration to sensitive environmental zones such as the Parkland Walk, rivers or other bio-diverse habitats where impacts should be avoided.
- 18.77 In addition, proposals should provide and/or leverage positive temporary or permanent activities in adjoining buildings and in the public realm to increase natural surveillance and animate the public realm to discourage its misuse.

High-quality materials

- 18.78 Proposals must be of a high quality and paving, lighting, street furniture, drainage, landscaping should be robust and able to be effectively managed and maintained over the long-term. Pavements surfaces should be non-slip in all weather conditions, suitable for all pavement users, permeable wherever possible maximising opportunities for sustainable drainage and contextual, reflecting and enhancing the surrounding character and architecture.

Supporting connectivity and active travel

- 18.79 Public realm should be located and designed to contribute to a series of connected and legible routes and spaces and respond to strategic objectives including the Green Grid, Green Chain, Ecological Corridors, Blue Ribbon, Walking & Cycling network and the Mayor's Healthy Streets Approach.

Events infrastructure

- 18.80 All new public realm anticipated to host public events should provide sufficient supporting infrastructure based on local needs, such as power sources, charging points, drinking water and digital infrastructure.

Privately owned public spaces (POPS)

- 18.81 It is recognised that many new public spaces created in the future are likely to be privately owned. These will be required to meet the same criteria as if they were publicly owned.

18.82 Detailed management plans must be prepared for these spaces, demonstrating how they:

- can be utilised by a range of users;
- contribute to mixed and balanced communities;
- relate positively to adjacent public spaces;
- avoid potential conflicts without compromising public access; and
- will operate in harmony with neighbouring local businesses and residents.

18.83 Adherence to management plans for privately owned public spaces will be secured through legal agreement.

Public toilets

18.84 When away from home, toilets are a critical component of an inclusive environment. Many people, including disabled and older people, may receive little warning of when they need to use the toilet and so having access to good, accessible toilets is often fundamental in deciding whether to go out or not. Areas where people meet, spend time or wait should have public toilet facilities. When considering access to public toilets the safety of all users, including women, girls and gender diverse people should be carefully considered. Public toilets can create nodes of safety and pairing them with other facilities such as cafes or kiosks can help provide natural surveillance.

18.85 A good example of access to public toilets is the Community Toilet Scheme (CTS) ran by different boroughs in London, with participating shops and restaurants providing the public with free access to their toilets during their trading hours.

Public toilets should:

- have signage to indicate the location of accessible toilets available for public use;
- include accessible toilets, family facilities, ambulant facilities, enlarged cubicles, all gender WCs and changing places facilities;
- not provide shared wash hand basins outside of mixed gender toilet cubicles or self-contained WCs;
- open into well-lit areas;
- locate self-contained WC cubicles, where provided, close to naturally surveyed areas and with good sight lines;
- provide baby change facilities that support all parents and where baby change is provided at least one should be wheelchair accessible;
- provide suitable sanitary waste facilities in all toilets, including for use by male, female and gender diverse people.

Policy D5: Active Street Frontages and Shopfronts

Town centres and high streets

- A. Within designated centres in the Town Centres Network and on identified high streets, proposals must support a vibrant, visually engaging streetscape and public realm including by:
- (1) incorporating non-residential ground floor uses with active frontages that attract activity and provide visual interest;
 - (2) using clear glazing to create visual connections between indoor and outdoor spaces, allowing passers-by to see activity inside;
 - (3) ensuring entrances are prominent, clearly visible, well-lit and accessible to all users, having regard to historic urban character;
 - (4) using high quality materials and distinctive architectural character to create visually appealing facades;
 - (5) taking opportunities to enhance the existing character, urban form and rhythm of the street frontage; and
 - (6) taking opportunities to enhance, reinstate and/or extend traditional shopping parades.

Public space

- B. Active frontages should be provided on at least two sides of all public squares and plazas.
- C. Proposals contributing to the creation of new public space located outside of town centres and high streets, should take opportunities to activate the space appropriately, including through the provision of active frontages on surrounding buildings.

Residential streets

- D. For residential streets:
- (1) frontages and front gardens should enhance the existing character and rhythm of the street;
 - (2) residential uses should provide informal passive surveillance via clear-glazed windows at ground floor and upper storeys that face onto the street;
 - (3) residential front doors should open directly onto the street unless there is historic precedent for an alternative arrangement; and
 - (4) full height glazing of ground floor level residential uses will not be supported.

Shopfronts

- E. For buildings with existing ground floor shop fronts or which previously had such shop fronts, proposals should:
- (1) make a positive contribution to local distinctiveness retaining historic shopfronts and their historic features;

- (2) relate well to the positive characteristics of the host building above and to any grouping of shopfronts in terms of architectural style, scale, proportions, detailing, shop windows and entrance doors design;
- (3) take opportunities to restore or reinstate historic shopfronts and their historic features ensuring replacement shopfronts as far as possible incorporate original materials and reinstate lost features which are characteristic of neighbouring premises;
- (4) be of traditional design, having regard to boroughwide design codes;
- (5) use carefully detailed, appropriate and robust high-quality materials;
- (6) integrate security measures into the design of the shopfront. Solid or perforated roller shutters or exposed, externally mounted shutter housing will not be permitted; and
- (7) not negatively impact on the significance of heritage assets.

F. Shopfront signage should:

- (1) be generally restricted to the fascia board above the shop window;
- (2) be consistent with original pilaster detailing;
- (3) not be overly large, visually discordant, project excessively forward or rise up the façade above the ground floor level;
- (4) be discretely illuminated, without affecting the full width of the fascia, limited to lettering or logos without overly dominant fittings and cables. Illumination should not cause a distracting glare or adversely affect homes above or near the shop. Bulky illuminated box facias will be resisted;
- (5) permanently display the property numbers of the shop and any accommodation at the entrances; and
- (6) preserve and enhance the character of Conservation Areas.

Supporting text

Active Frontages

- 18.86 Active frontages are an essential part of maintaining the vibrancy of the borough's town centres, high streets and public spaces. Active frontages are characterised by uses and features that promote visual and physical engagement with the street or public realm. They can also provide informal surveillance opportunities improving the safety of an area and creating vitality through the presence and interaction of people.
- 18.87 The borough's various street frontages make an important contribution to local character. Opportunities to enhance the existing character, urban form and rhythm of these will be supported. Building widths and repeating features should be maintained and, where appropriate, proposals should follow existing building lines.
- 18.88 Haringey is also home to a variety of shopping parades. These are defined as planned developments incorporating rows of shops with a strong degree of architectural uniformity. These also make an important contribution to local character and proposals to enhance, reinstate, or where appropriate extend these will be supported.

Shopfronts

- 18.89 Shopfronts should contribute positively towards a cohesive streetscape and should be of a high-quality design which refers to the architecture of the host building, neighbouring units and general scale and rhythm of the shopfront widths in the area. Materials, detailing, craftsmanship and finishes are equally important in achieving high-quality design, especially as shopfronts are viewed close-up.
- 18.90 Shopfronts with poor quality materials, bulky and crudely attached signage, fully internal illuminated box facias and intrusive signage add to visual clutter and detract from the appearance of the streetscape. Use of solid security shutters creates a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating fear of crime and personal safety. To reduce visual clutter from the frontage, the grille box should be designed to be hidden behind the fascia.
- 18.91 Historic shopfronts should be retained and replacement shopfronts should respect, and where lost, reinstate, traditional features such as shopfront framework features, pilasters, brackets, facias and projecting signs. This is especially important where the shopfront would have an impact on the significance of a heritage asset or its setting. Timber will normally be encouraged as the most suitable material for traditional shopfronts.
- 18.92 The Bruce Grove Conservation Area Design Guide provides detailed guidance on the design of shopfronts in the Bruce Grove Conservation Area, including the design of forecourts and upper facades. It establishes good design principles to safeguard locally distinctive features and heritage assets and enhance the urban character and rich and diverse history and culture in Bruce Grove. Many of the principles may also apply to historic shopfronts in other areas of the borough, and as such proposals for alterations to shopfronts should have regard to the Bruce Grove Conservation Area Design Guide.
- 18.93 Generally, shop fronts should be of a traditional design, unless it can be demonstrated that an innovative high-quality contemporary design will better contribute to the character of the streetscape.
- 18.94 Poorly designed or excessively bright illuminated shop fascias, over-large or inappropriately sited fascias or signage can detract from the visual quality of the town centres and high streets. Shop signage should generally be confined to the fascia, defined by permanent integrated architectural detailing that respects the proportions and frame of the shopfront and those of adjacent shopfronts. Depending on the specific design of the host building, its group and its area, one small projecting or hanging sign may be acceptable providing this is sensitively located according to the original design. Additional signage should be minimal, consolidated, and restricted to information of public importance, such as hours of operation, and safety and hygiene details.

18.95 Design should be consistent with original pilaster detailing Where this survives, the height of the fascia sign should be consistent in height with the original detailing and should be proportionate to the design of the shopfront and its host building.

18.96 In order to comply with Policy D3, shopfronts will be expected to:

- Integrate easy access into the shopfront itself with level entrances where possible. Where ramps are required, these should be located internally except in exceptional circumstances.
- Maintaining or including independent access to upper floor accommodation from the street frontage as part of an integrated design.

Policy D6: Artificial Lighting and Managing Noise Pollution

Artificial lighting

- A. Development proposals must mitigate and manage light pollution by ensuring that lighting is designed to minimise and control the level of illumination, glare, angle and spillage of light, particularly to protect sensitive receptors such as homes properties and natural habitats.
- B. Development proposals should seek opportunities to enhance the function, safety and appearance of the public realm through sensitively integrated external lighting.

Noise pollution

- C. New noise sensitive development should be sited away from existing noise generating uses and activities, or where this is not possible, provide adequate separation and acoustic design measures so that there is no internal noise transmission higher than that allowed for under Part E of the building Regulations for internal noise transfer. This should take into account the cumulative effects of noise from multiple sources. This may involve consideration of the combined impacts of both existing and proposed noise sources and to incorporate suitable mitigation measures.
- D. A Noise Impact Assessment and/or Vibration Impact Assessment must be submitted with applications for developments likely to involve a significant noise or vibration generating use. This should take into account factors such as noise levels, duration, frequency, and the potential for cumulative noise effects and seek to minimise these.

Supporting Text

Artificial lighting

- 18.97 The policy aims to safeguard residential properties and natural habitats from the negative impacts of excessive artificial lighting. Uncontrolled illumination can disrupt the sleep patterns of residents and disturb the natural behaviour of wildlife. By minimising light pollution, the policy seeks to maintain the well-being of human populations and preserve the ecological balance.
- 18.98 Well-designed lighting can enhance the functionality of public spaces by providing adequate visibility and ensuring safety for pedestrians, cyclists, and motorists. Thoughtful placement and design of lighting fixtures can contribute to a well-lit environment, enabling people to navigate public areas comfortably and efficiently.
- 18.99 Properly designed lighting installations can help prevent accidents, deter crime, and improve the overall safety of public spaces. By integrating lighting in a way that

minimises shadows, illuminates potential hazards, and creates a sense of security, the policy enhances public safety and promotes a welcoming environment.

- 18.100 This approach to artificial lighting aims to strike a balance between mitigating light pollution to protect sensitive receptors and preserving natural habitats, while also seeking opportunities to improve functionality, safety, and aesthetic appeal in the public realm through well-designed and integrated lighting solutions.

Managing noise pollution

- 18.101 Requiring a Noise Impact Assessment and/or Vibration Impact Assessment helps create awareness about potential noise and vibration issues associated with proposed developments. By assessing the impact beforehand, it will allow the Council to evaluate the potential effects on the surrounding environment and community. This includes identifying potential sources of noise and vibration and their likely impacts. This information is required to enable developers to take necessary measures to mitigate or minimise negative effects on nearby sensitive receptors, such as residential areas, schools, hospitals, or other noise-sensitive locations.
- 18.102 The policy also promotes the principle of preventing adverse impacts on noise-sensitive developments. By siting new noise-sensitive developments away from existing noise sources, it aims to minimise potential conflicts and disturbances that may arise due to noise exposure. This approach helps maintain a suitable living or working environment for residents, ensuring their comfort and well-being and aligns with the agent of change principal in the London plan.
- 18.103 In cases where it is not feasible to site noise-sensitive developments away from existing noise sources, the requirement for acoustic design measures becomes crucial. By implementing appropriate design techniques, such as sound barriers, insulation, or specialized construction methods, the policy seeks to minimise the transmission of noise and not hinder these existing operations.

Policy D7: Advertisements and Telecommunications

Advertisements

- A. Advertisements will be supported when they:
- (1) do not harm the use of, or safety of, the highway and its users;
 - (2) are well integrated into their surrounding context, including existing and future-planned development;
 - (3) are of excellent design and quality, in terms of location, dimensions, framing, materials and lighting;
 - (4) do not add unacceptable street or visual clutter;
 - (5) do not detract from the significance or setting of heritage assets; and
 - (6) contribute positively to the local street scene.

Telecommunications infrastructure

- B. Telecommunications infrastructure should:
- (1) be sited and designed to minimise visual impact and intrusion on streetscapes, architectural features and heritage assets;
 - (2) prioritise the use of below ground infrastructure where possible to maintain a clean and uninterrupted visual environment.
 - (3) ensure public safety and accessibility by avoiding the obstruction of pathways, roadways and other public areas, ensuring that it does not impede the movement of pedestrians, cyclists or wheelchair users;
 - (4) avoid cluttering public spaces and maintain clear site lines, especially around local landmarks and heritage assets; and
 - (5) incorporate high-quality, durable materials that complement the surrounding architecture and landscape.

Supporting text

Advertisements

- 18.104 Advertisement and hoardings applications are required to follow the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. Applications for advertisements should be accompanied by accurate drawings or photo montages that depict the entire street frontage, including the locations and types of existing shopfronts and advertisements within 25 meters in either direction, as well as the adjacent frontage.
- 18.105 Any proposals for advertisements in or adjacent to the Transport for London Road Network (TLRN) will require input from Transport for London with reference to the impact of the advert on the safe operation of the highway network.
- 18.106 Special attention is required for advertisements on or near listed buildings and within conservation areas. Internal illumination of advertisements in these areas is generally not permitted.

Policy D8: Masterplans and Site Assembly

Masterplans

- A. Proposals must be supported by a masterplan where:
 - (1) it is required by a related site allocation;
 - (2) development relates only to part of the site allocation and does not propose comprehensive development of the site allocation as a whole;
 - (3) development falls within a placemaking focus area as identified in the relevant neighbourhood chapter;
 - (4) the development is proposed to be delivered on a phased basis; and/or
 - (5) the development comprises land in multiple ownerships or is adjacent to a site allocation.
- B. Where a masterplan is required for a site, the submitted masterplan should:
 - (1) be design-led in accordance with Policy D2;
 - (2) be prepared at a suitable scale including other parts of the site and adjoining land where appropriate;
 - (3) demonstrate how the masterplan contributes to climate resilience and supports a comfortable microclimate in the public realm;
 - (4) demonstrate how proposals will successfully deliver the placemaking aspirations contained within the Local Plan.
- C. Masterplans should be informed by appropriate engagement, including with landowners, occupiers and local communities and should also be accompanied by an engagement strategy detailed this engagement as well as future planned engagement linked to the planning process.

Phasing

- D. Where an outline planning permission is sought, or a proposal is planned to be phased, masterplans should include or be accompanied by a site-wide design code to ensure design quality is maintained throughout the planning and delivery process.
- E. Masterplans must include a delivery strategy setting how the development will be implemented and managed over its lifetime. This should address the following as relevant: phasing, infrastructure requirements and provision, approach to meanwhile uses including the management of landscape and planting, approach to land assembly and preparation.
- F. Where planning policies or related development standards are updated over the lifetime of an outline planning permission, reserved matters applications will be considered against the most recently adopted policy and/or standard.

Site Assembly

- G. The Council encourages land assembly where this will help achieve comprehensive and co-ordinated development. Consideration will be given to the use of compulsory purchase powers where targeted land assembly is

required to achieve the placemaking aspirations set out within the Local Plan. Such powers will be employed only where necessary and where all reasonable negotiation attempts have been made to acquire, or secure an option over, the land/buildings needed,

Supporting text

Masterplans

18.107 The delivery of much of the placemaking envisaged within this plan will be both challenging and complex. The scale of development envisaged over the plan-period aligned with the placemaking ambition of the Council and its communities will require a proactive, coordinated and comprehensive response by a full range of stakeholders. A key planning tool to achieve this is the preparation of site or area-wide masterplans. Broadly the benefits of masterplans will be to:

- help ensure the activities of a wide range of development stakeholders are fully coordinated and that there is a shared understanding of opportunities and constraints including infrastructure
- avoid piecemeal schemes which are more easily delivered but which have potential to prejudice wider placemaking aspirations
- support the proper planning of development (in terms of layout, design, use) and to facilitate comprehensive development which optimises the use of land, delivers the council's placemaking aspirations and maximises local benefits for communities
- help ensure development, including on large and complex sites, can come forward in a coherent and well-phased manner, that harnesses the full benefits of investment and delivers more sustainable outcomes
- maximise the speed at which proposals are able to be consented and delivered through stakeholders working together to avoid undue delays in the planning process, to the benefit of everyone involved

18.108 Where required, masterplans should be prepared to cover a suitable scale having regard to the nature and size of the proposal, relevant planning permissions, land ownerships, allocations, placemaking focus areas and other identified opportunities and constraints. Masterplans must be developed in accordance with the design-led approach set out in Policy D2 and will be expected to include fully measured and scaled plans and sections and address the following as appropriate at strategic and/or detailed level:

- Land uses and their distribution
- Indicative density, block types and structure, building lines, views and maximum building heights
- Street hierarchy, access and movement
- Public realm and open space network
- Blue and green infrastructure

- Physical infrastructure and services
- Response to the climate emergency, including managing the local microclimate
- Social and cultural infrastructure
- Housing types, sizes, tenures and distribution
- Establishing a place identity, for example through use of landscaping, materials, detailing, roofscapes, and how the buildings meet the ground
- How development sites relate positively to one another within the masterplan area, as well as the surrounding area.

18.109 Consideration of infrastructure needs is crucial to good master planning. These needs should be clearly identified and addressed through the master planning process to support positive placemaking outcomes, having regard to the Infrastructure Delivery Plan.

Masterplans should be submitted at the outline or full planning application stage and in advance of reserved matters.

18.110 The preparation of masterplans should be informed by appropriate engagement, consistent with principles of early engagement in this plan and within the council's Statement of Community. An engagement strategy should be submitted alongside a masterplan detailing past and planned engagement efforts and how feedback received to date has been taken account of and responded to.

18.111 In regard to engagement with communities, physical 3D models are strongly encouraged in addition to digital 3D visualisations. Physical models are of particular value to facilitate successful engagement and optimise accessibility for all consultees.

Phasing

18.112 The main purpose of site-wide design codes is to ensure that design quality is maintained throughout the planning process by describing the key design principles of a development proposal in a simple, concise and mainly graphical format. Site-wide design codes should draw on the proposal's layout, massing and heights to define the principal features that make up the overall design integrity of the scheme. Assessment of the design of large elements of a development, such as landscaping or building façades, should be undertaken as part of assessing the whole development at the outline planning stage and not deferred for consideration after planning permission has been granted.

18.113 Site-wide design codes may be developed in collaboration with the Council, or they may be community-led. For example, the Finsbury Park and Stroud Green Neighbourhood Forum is developing a local Design Code as part of the Government's Design Code Pathfinders programme.

18.114 Masterplans must include a delivery strategy detailing how the development will be implemented and managed over its lifetime. This should include:

- i. Phasing of the development, including sequencing and timings.
- ii. Infrastructure requirements at each phase of development, how funding is to be secured, and proposed coordination with providers for timely delivery to meet local needs.
- iii. A meanwhile use strategy to ensure benefits are maximised throughout the development process and consideration for how any meanwhile uses which are established before or during the development process could be integrated into the final development or re-located elsewhere.

18.115 The Council wishes to ensure that development proposals do not prejudice each other, or the wider development aspirations for the Borough. Where it is unclear how neighbouring sites will be developed in the future, applicants should provide alternative design options for consideration as part of preapplication proposals.

Response to microclimate

18.116 We expect microclimate studies to be used to inform the location and layout of the masterplan from the very start. Public and communal spaces should be comfortable to ensure that they are well-used throughout the day. Wind and sun analysis should be used to help establish their location and balanced with other factors such as their relationship to transport, local centres, key connections and existing assets.

Site assembly

18.117 A comprehensive approach to development may be in the public interest. Consideration will be given to the use of compulsory purchase powers where targeted land assembly is required to achieve the placemaking aspirations set out within the Local Plan. The need to use compulsory purchase powers is more likely on sites with more complicated issues, such as sites which have land in multiple ownerships.

Policy D9: Views

- A. Proposals must protect and where possible enhance the characteristics and composition of the strategic view from Alexandra Palace to St Paul's Cathedral as designated and protected in the London Plan (Linear View 1 – Alexandra Palace to Central London), and in accordance with the London View Management Framework Supplementary Planning Guidance.
- B. Proposals must preserve and where possible enhance the characteristics and composition of designated Local Views within Haringey, having regard to the Haringey Local Views Management Framework, and views which cross into Haringey and are designated in neighbouring borough Local Plans.
- C. Proposals should protect designated viewing locations and, where possible, enhance inclusive public access to them.
- D. Where buildings which currently impact on Local or Strategic Views are subject to complete or partial redevelopment, proposals should not result in further detriment to such views and, where possible, opportunities should be taken as part of development to improve existing views.
- E. Proposals should have regard to other identified but non-designated views and taking account of relevant placemaking aspirations should seek to avoid harm to these and where possible take opportunities to enhance them.

Supporting text

18.118 Designated views are required to be protected and enhanced as they contribute to the legibility of Haringey and London more widely, allowing the public to better understand the layout of the city, its features and landmarks.

18.119 Haringey has one designated panoramic Strategic View 'View 1: Alexandra Palace to Central London' which makes a significant contribution to the image and character of London at the strategic level. The London View Management Framework Supplementary Planning Guidance provides further guidance on the valued characteristics and composition of the view and how it should be protected and enhanced.

18.120 In addition, there are many designated Local Views categorised as panoramic, linear, townscape views or a mix of these. The Haringey Local Views Management Framework will provide further guidance on the valued characteristics and composition of the views and how they should be protected and enhanced.

18.121 Proposals should have appropriate regard to other identified but non-designated views. These include views that have been identified in neighbourhood chapters, the Placemaking and Urban Character Study, Conservation Area Appraisal Management Plans, and through site appraisals. It is recognised that loss of, or harm to, some non-designated views may be unavoidable in order to deliver wider placemaking aspirations for certain sites.

Policy D10: Tall and Mid-Rise Buildings

Haringey's tall building definition

- A. Tall buildings in Haringey are buildings that are at least 30m high, measured from the existing ground level to the floor level of the uppermost storey of the building, as set out in Figure 1. Tall buildings will only be supported in locations identified as 'Suitable for Tall Buildings', as set out in Figure 2, and having regard to the Haringey Tall Buildings Study.
- B. Mid-rise buildings in Haringey are buildings that are at least 18m high and less than 30m high, measured from the existing ground level to the floor level of the uppermost storey of the building. Locations suitable for mid-rise buildings will be considered on a case-by-case basis.

Visual impact

- C. Proposals for tall and mid-rise buildings should be of an exemplary design standard, contributing positively to their local context. They should be designed to:
 - (1) be in accordance with relevant neighbourhood policies and site allocations;
 - (2) respond sensitively to existing building heights, scale and massing to enhance the visual character of the existing and emerging townscape and skyline;
 - (3) relate positively to and not harm the significance of heritage assets and their settings, in accordance with policy HE1;
 - (4) respond positively to immediate, mid-range and long-range views towards the site, ensuring that the location, form, detailing and prominence of the buildings are appropriate within their wider context, having regard to protected views in accordance with policy D9;
 - (5) have regard to the cumulative impacts of tall building clusters;
 - (6) contribute positively to the legibility of the local area and its spatial hierarchy; and
 - (7) take an appropriate approach to the articulation and composition of the building form that is proportionate to its scale and context.

Relationship to the public realm

- D. Proposals for tall and mid-rise buildings should relate positively to the surrounding public realm, respecting and enhancing the human-scale experience at the ground floor level. The ground floor of proposals should be designed to:
 - (1) respond positively to any adjacent public realm or blue and green infrastructure, fostering connectivity, accessibility and social interaction;
 - (2) include active ground floor frontages that contribute to a vibrant street life
 - (3) provide well-integrated services access, avoiding negative impacts on the continuity of active frontages; and
 - (4) ensure all ground floor frontages, whether active or not, incorporate high-quality, durable materials which enhance the quality of the public realm.

Mitigating microclimate impacts

- E. Proposals for tall and mid-rise buildings should avoid negative impacts on neighbouring sites and areas. Proposals should be designed to:
- (1) minimise overshadowing of existing buildings and amenity spaces and avoid significant negative impact on existing renewable energy installations on adjacent sites;
 - (2) avoid negative microclimate impacts on nearby sites and public realm including wind tunnels, overheating, daylight access, glare, pollution and overshadowing; and
 - (3) mitigate the cumulative impacts of proposed, consented and planned tall and mid-rise buildings, including through introducing landscape and biodiversity measures.

Amenity in tall and mid-rise residential buildings

- F. Proposals for tall and mid-rise buildings should support healthy and safe places, providing high quality accommodation and good amenity for residents including families with children. Proposals should:
- (1) protect residents and users from fire emergencies and provide a safe means of escape. Design and Access Statements must include a fire statement that demonstrates how the proposals comply with the Fire Safety Act;
 - (2) provide high-quality publicly accessible open space, communal amenity and inclusive play space;
 - (3) achieve the following minimum space standards for private outdoor amenity space:
 - a provide at least 6.25sqm high-quality private outdoor amenity space for 1-2 person dwellings;
 - b where dwellings are larger, an extra 1sqm should be provided for every additional occupant; and
 - c private outdoor amenity spaces should have a minimum depth and width of 2.5m;
 - (4) optimise opportunities to embed green infrastructure and improve access to existing open space; and
 - (5) ensure that building services and waste management storage facilities are designed to be discreet, robust and easy to access and maintain.

Demonstrating design quality

- G. Proposals must demonstrate that buildings have been designed to sustain a high-quality visual appearance that is easy to maintain throughout their lifespans. As such, high-quality external materials should be specified and proposals should include a realistic maintenance plan that is affordable and does not cause disturbance or inconvenience to the surrounding public realm.
- H. As part of the planning application process applicants must submit 3D models of their designs in an agreed format to allow a full assessment of the tall or mid-rise building (or cumulative impact of a cluster of tall buildings) across the borough.

- I. Proposals for tall or mid-rise buildings impacting protected local views must provide a Visual Impact Assessment, having regard to policy D9.

Supporting text

Tall buildings in Haringey

- 18.122 Whilst tall buildings are not the only solution to delivering high density or large quantities of housing, they can contribute positively to facilitating renewal and future growth, making optimal use of sites which are well-connected by public transport and have good access to services and amenities.
- 18.123 Mid-rise, high-density accommodation can also contribute positively to optimising site capacity. For instance, mid-rise mansion blocks, terraces or stacked maisonettes can achieve the same number of homes or floor space without excess height. Mid-rise buildings can offer advantages in terms of better amenity and more affordable maintenance.
- 18.124 This policy sets out a plan-led approach to the location and design of tall and mid-rise buildings that supports good placemaking while helping to address housing need in the borough. Locally specific guidance can be found within the neighbourhood chapters of the Local Plan. In addition, the Haringey Tall Buildings Study provides a robust evidence base justifying locations that have been identified as appropriate for tall buildings and setting out the key principles to inform the location of mid-rise and tall buildings. Applicants are expected to use these principles to justify the location of mid-rise building and tall buildings within site allocations, the latter being confined to Locations Suitable for Tall Buildings.

Measuring building height

- 18.125 Tall and mid-rise buildings are defined relative to existing ground level. Where the level of the surface of the ground on which the building is proposed is not uniform, 'ground level' will be the level of the lowest part of the surface of the ground immediately adjacent to it, as shown in the diagram below.

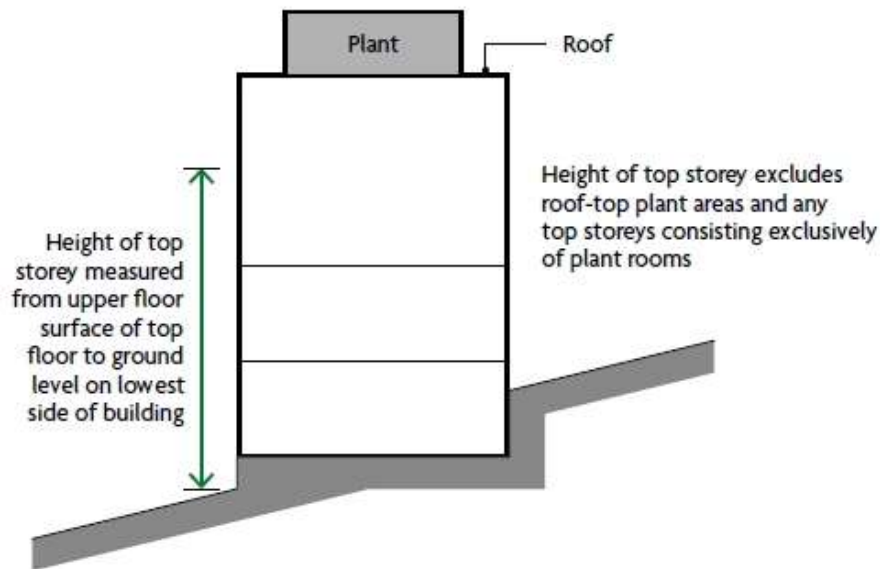
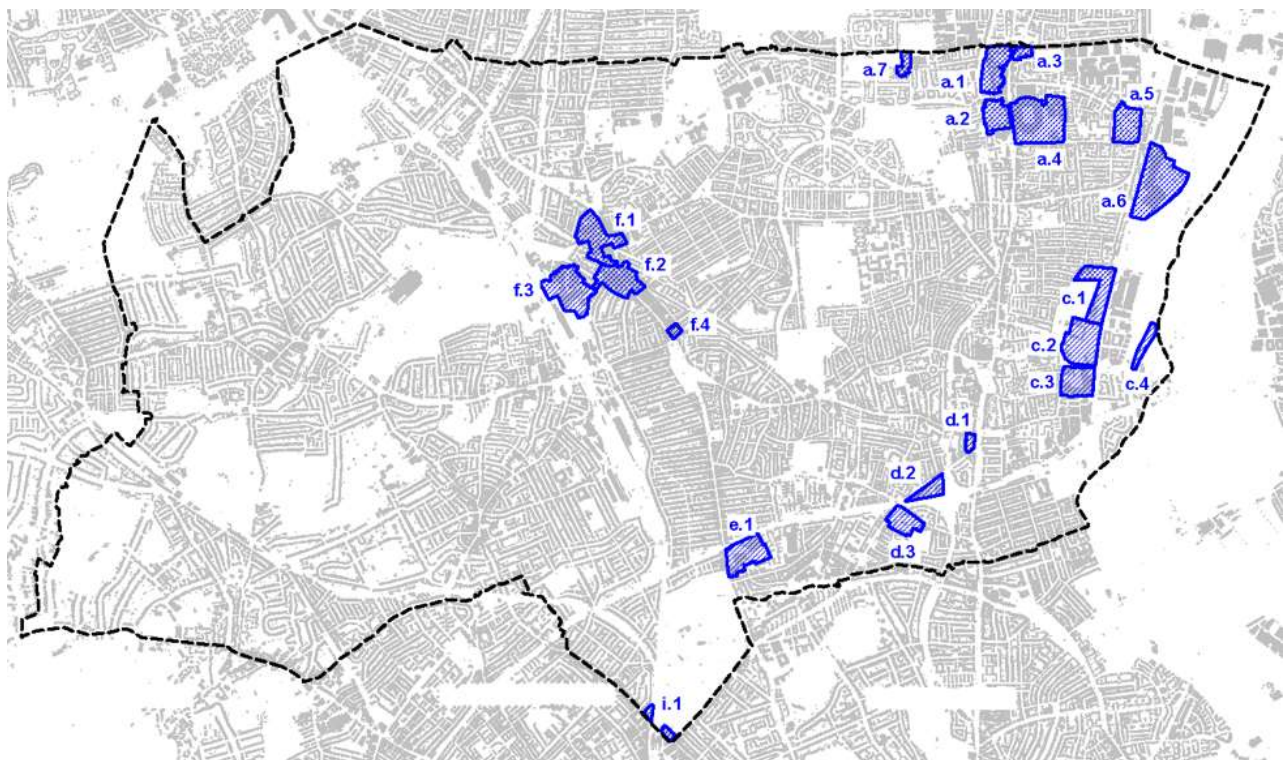


Figure 1: How to measure building height
(Image source: Approved Document B, Vol 2: Diagram D6)

Locations Suitable for Tall Buildings

18.126 The Haringey Tall Buildings Study identified the following Locations Suitable for Tall Buildings:

18.127 Figure 2: Areas suitable for tall buildings



a. North Tottenham

- a.1 High Road West (North)
- a.2 High Road West (South)
- a.3 Altair Close
- a.4 Spurs Stadium Area
- a.5 Northumberland Park East
- a.6 Northumberland Park Depots
- a.7 Selby Urban Village

c. Tottenham Hale

- c.1 Ashley Road North & Watermead Way
- c.2 Station Square & Ashley Road South
- c.3 Tottenham Hale Retail Park
- c.4 Hale Wharf

d. Seven Sisters

- d.1 Wards Corner
- d.2 Gourley Triangle
- d.3 Sir Frederick Messer Estate

e. Green Lanes

- e.1 Arena Retail Park

f. Wood Green

- f.1 Wood Green High Road North
- f.2 The Mall
- f.3 Cultural Quarter & Clarendon Square
- f.4 Turnpike Lane Junction

i. Stroud Green

- i.1 Stroud Green Road

Visual impacts

- 18.128 In some locations there is opportunity for discrete and identifiable clusters of tall and mid-rise buildings. Building heights in clusters should drop away from the centre to the edges and not all buildings should be tall, to avoid creating a ‘wall’ of development.
- 18.129 In assessing the impact of tall and mid-rise buildings, detailed consideration should be given to potential impacts on the significance of designated heritage assets and their setting, having regard to policies HE1 and D9. Applicants are encouraged to engage with Historic England early in the design process.

Relationship to the public realm

- 18.130 Tall and mid-rise buildings have a greater impact on surrounding public realm and amenity than smaller scale development and as such they must make a significant positive contribution to the streetscape and public realm. This includes providing active frontages and engaging ground-level activities, as well as maintaining high design standards for publicly visible service areas at ground floor.
- 18.131 Proper integration of proposals into the urban fabric is crucial to enhancing connectivity, promoting social interaction, and maintaining a harmonious and human-scaled environment at street level, given their significant impact on the borough’s skyline and public spaces.

Impacts on microclimate

- 18.132 Tall and mid-rise buildings can significantly impact the surrounding environment, including the microclimate, contributing to health and safety concerns

for residents. As a result, greater scrutiny will be applied to avoiding and mitigating these impacts. Wind Microclimate Studies will be required for tall and mid-rise buildings, in accordance with the below.

18.133 Wind Microclimate Requirements

Building Height	Required approach
Less than 10 storeys	Wind studies are not required, unless the surrounding area experiences heavy pedestrian traffic, a high number of sensitive pedestrian users (for example hospital, nurseries or care homes), or is located on an exposed location (e.g. next to the River Lea)
10 to 14 storeys	Desk-based Wind Microclimate Study
14 to 20 storeys	Desk-based Wind Microclimate Study and Computational Simulations (CFD ² or equivalent)
Above 20 storeys	Early Stage Massing options: Wind Tunnel Testing and Detailed CFD model and/or testing in Detail Design

18.134 The following items are the basic minimum requirements for any type of wind microclimate study;

- Use of Lawson Criteria (LDDC version) to present the results;
- Consideration of minimum of 16 wind directions, and not just the prevailing south-westerly components;
- Combination of long-term London weather statistics (ideally through processing at least 10 years of good quality weather data) with local wind flows obtained from wind tunnel tests or CFD, with allowances for future projected wind speeds;
- Consideration of mean and gust speeds, and reporting of both winter and summer conditions;
- Careful assessment and description of expected pedestrian uses (sitting, standing, walking, etc.) in different parts of the site, whereby all designated amenity spaces should be suitable for sitting (or otherwise as intended); and
- Clear indication of mitigation requirements (size, location, porosity, etc.) with photos of wind tunnel models, sketches of proposed measures with dimensions and location plans.

² Computational Fluid Dynamics (CFD) modelling is the industry standard method for wind simulation

Policy D11: High Quality Housing

- A. All proposals resulting in new or additional self-contained homes (including as a result of extensions, conversions and changes of use) must be of high-quality design that promotes health and wellbeing. As part of this proposals must:
- (1) meet or exceed minimum internal space standards as set out in the London Plan and associated guidance and provide adequately sized rooms and functional layouts;
 - (2) ensure good orientation, and daylight and sunlight access and meet or exceed the aspect, orientation, daylight and sunlight standards for private internal space as set out in the London Plan and associated guidance;
 - (3) provide good quality private external amenity space which meets or exceed the minimum space standards for private external amenity space which for tall and mid-rise buildings are set out in policy D10 and for other buildings are set out in the London Plan and associated guidance;
 - (4) must meet or exceed targets in the London Plan for delivering accessible housing including wheelchair user dwellings and otherwise deliver homes designed to be accessible and adaptable to meet changing occupier circumstances over the lifetime of the development;
 - (5) provide inclusive access and support social integration and inclusion of residents
 - (6) provide high-quality dedicated play and recreational space for children in accordance with Policy S2
 - (7) make appropriate provision for the storage and collection of waste in accordance with Policy D12
 - (8) make appropriate provision for secure cycle storage, in accordance with policy T3
 - (9) avoid, minimise, and mitigate adverse effects on the amenity of adjacent properties
- B. Proposals are encouraged to meet best practice standards wherever possible and should clearly set out at planning application stage where these have or have not been met.

Internal space and function

- C. Proposals should provide high quality rooms designed to function comfortably and efficiently for their intended purpose with layouts designed to provide efficient and comfortable circulation.

Aspect, orientation, daylight and sunlight

- D. The design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings whilst also ensuring that adjoining land or properties are protected from unacceptable overshadowing. Proposals should be consistent with BRE guidance and with British Standard BS EN 17037 'Daylight in buildings'.

- E. Proposals should provide dual aspect homes unless provision of dual aspect is demonstrated to be impossible or unfavourable. Where such circumstances are demonstrated, all single aspect units must:
- (1) provide a good level of daylight for each habitable room and optimise opportunity for direct sunlight. There should be at least one openable window in each habitable room that provides a view out when seated.
 - (2) ensure that the aspect is not north-facing and does not face onto main roads or other significant sources of air pollution and/or noise and vibration, which would preclude opening windows;
 - (3) provide a good level of natural ventilation throughout the home via passive/non-mechanical design measures, demonstrating that overheating risk is not increased; and
 - (4) ensure that future occupiers have a good level of privacy and do not experience adverse impacts from overlooking.
- F. Proposals should maximise natural light while minimising overheating risk. All homes should provide for direct sunlight to enter the main habitable rooms for a reasonable period of the day.

External amenity space

- G. Private amenity space should be practical in terms of its shape and utility and should offer good amenity. All home should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony.

Accessibility and adaptability

- H. Proposals for homes for wheelchair users must comply with London Plan and Building Regulation standards. These should be single-storey units and located at ground floor level. Where provided above or below entrance level there must be at least two suitable lifts available for use within escape distances compliant with Building Regulations.
- I. All homes should secure step-free access. Multi-storey homes should provide space for future provision of a stair lift or a suitably identified space for a through-the-floor lift from the entrance level.

Ensuring inclusion

- J. Mixed tenure proposals must be designed to be 'tenure blind' to ensure that homes across tenures are indistinguishable from one another in terms of quality of design, space standards and building materials.
- K. Entrances should be logical, legible and level or gently sloping. The distance from parking spaces/drop-off points to the main entrance to the residential building must be no more than 50m. The total distance between a parking

space/drop-off point and an individual home entrance must be no more than 75m.

- L. Entrances to different housing tenures should be shared. Separate accesses will only be acceptable where this is demonstrated not be possible or where shared building access would demonstrably impact the level of affordable housing on site.
- M. Layout and design of multi-home developments must maximise opportunities for social interaction. Proposals seeking to introduce segregated communal amenity space or separate communal access for affordable and market sale homes will be resisted.
- N. The number of homes accessed from a single core must not be more than eight on each floor, although a smaller number is preferable. Good circulation space should provided within communal areas.

Neighbouring uses

- O. Proposals must consider the effect on amenity of adjacent properties and put in place measures to address any potential adverse effects. Consideration should include:
 - (1) internal layout, including the relationship of rooms on different floors within the scheme, and the position of entrances, extensions and fire escapes;
 - (2) overlooking or overshadowing impacts;
 - (3) impacts on existing delivery and servicing provision; and
 - (4) noise and vibration impacts.

Supporting text

18.135 Delivering high-quality homes of all tenures is a key priority for the Council. The above policy aims to ensure all new homes are of suitable quality and support a good quality of life for residents, particularly for their health and wellbeing. Homes can be delivered in different physical forms depending on the context and site characteristics. Experience of the pandemic and the shift towards increased remote working has underscored the importance of have sufficient space and storage at home. Ensuring homes are of adequate size and fit for purpose is therefore increasingly important. Proposals must therefore meet minimum internal space standards as set out in the London Plan and associated guidance and provide adequately sized rooms and functional layouts. The space standards are minimums which applicants are encouraged to exceed. The standards apply to all new self-contained dwellings of any tenure.

18.136 The Building Research Establishment (BRE) provides guidance on site layout planning to achieve good sun-lighting and day-lighting (BRE Site Layout Planning for Daylight and Sunlight: a guide to good practice, 2022). The guidance includes advice

on site layout to provide good natural lighting within new development, safeguarding of daylight and sunlight within existing buildings nearby, and the protection of daylighting of adjoining land for future development. It also includes guidance on the loss of solar radiation for solar panels and passive solar buildings that use the sun as a source of heating energy.

18.137 Ensuring dwellings are dual aspect is an important part of achieving good daylight and sunlight access, as well as enabling natural cross-ventilation and helping to address overheating. Proposals must make it clear where dual aspect dwellings are not able to be achieved and justify the appropriateness of single aspect dwellings against the specified criteria in minimising overheating, proposals must be in keeping with Policy CR3.

18.138 Good quality private external amenity space must be provided, meeting or exceeding the minimum space standards for private external amenity space as set out in the London Plan and relevant guidance. Homes in tall and mid-rise buildings must meet the higher standards set in Policy D10.

18.139 Housing developments should help create a more inclusive Haringey, in keeping with Policy D3. Developments should be designed to maximise tenure integration, and affordable housing units should have the same external appearance as private housing. Accesses to different tenures should be shared unless there is a robust justification for separate accessed. Where entrances for affordable homes are separate these must:

- be accessible, well integrated and located on main frontages or as close as possible to main frontages, unless location away from main frontages results in improved residential amenity;
- ensure that the location of building access will not affect safety and security of residents or lead to negative perceptions of safety and security;
- maintain the dignity of residents of affordable units and avoid locating building access for these units adjacent to waste/refuse areas and/or other building services; and
- be of equivalent quality standard and appearance as the entrances for market value units to ensure successful integration and tenure-blind design.

18.140 Wheelchair user dwellings, compliant with the higher of London Plan and Buildings Regulation requirements, should be clearly shown on plans. All other dwellings created via works to which Part M volume 1 of the Building Regulations applies, should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings'.

18.141 Schemes providing multiple units should ensure shared circulation space is adequate. Common/shared entrances should lead to a hall large enough for people to manoeuvre with shopping and/or prams and/or wheelchairs with ease. Communal circulation corridors should ideally be 1.5m wide, but no less than 1.2m wide. Where

they have an unobstructed width of less than 1.5m, communal corridors should have wheelchair turning spaces at reasonable intervals. Access cores must provide an access control system, with entry phones in all homes linked to a main front door with remote electronic lock release.

Policy D12: Waste Storage

- A. All new development must provide sufficient storage for waste in accordance with the standards below, Tables 1 and 2, and the Haringey Waste Services Developers Guide document.

Low rise housing with individually allocated bins

- (1) Space must be provided for three standard wheelie bins on site that is visually screened or discreetly located away from the front elevation
- (2) Kitchens should be able to accommodate separate internal mixed recycling and refuse waste bins and for a 7-litre food caddy.

Conversions above shops

- (3) Residential conversions above shops must make provision for waste storage within the curtilage of the premises

Large developments (including mixed-use) and Communal Collections

- (4) Developments of 6 or more units must incorporate a bin store and use bulk bins for refuse and recycling
- (5) Any development proposal of over ten residential units must be supported by a waste strategy using Re: London's building strategy template to encourage residents to apply the waste hierarchy
- (6) Safe access to the collection point must be secured including adequate manoeuvring space for bins to be transferred to collection vehicles, and any locking gates must be code activated to enable crew's access
- (7) Areas where bins are stored from must be no further than 10 metres from the point of collection with no kerbs or steps between the two, and a maximum gradient of 1:20, and have height clearances of 4.75 metres and be load bearing to 26 tonnes
- (8) The site design must ensure all non-residential and residential waste are stored separate from each other in separate bin areas.
- (9) The maximum design capacity for commercial waste storage should not rely on high frequency collections. To do so would promote higher levels of vehicle movements adding traffic congestion and pollution as well as risk overflows
- (10) No bins, be they commercial or residential, will be permitted to be stored on the public highway

Bin storage design

- (11) Bin stores must be large enough to fit as many containers as are necessary to facilitate once per week collection, as indicated in Table 1, with roof heights sufficient to allow residents to freely stand up inside while fully opening/closing bin lids
- (12) Internal housing layouts must allow all containers to be easily accessed by users so that one container must be able to be safely and easily removed from/put back to its original location within the bin store without the need to move other waste containers.

- (13) All doors and pathways need to be 200mm wider than any bins that are required to pass through or over them. Housings must have the necessary lighting to facilitate safe usage for residents and collection crews.
- (14) A separate covered storage area for bulky household waste or reusable items, e.g., white goods and furniture, with direct vehicle access, must be considered for all developments over ten units

Table 1: Standards for schemes up to 6 units or individually accessed properties including houses

Refuse allocation	Capacity	2 Approximate bin dimensions
Per 1 bed, low-rise dwelling when supplied for sole use.	140 litres	550mm D x 500mm W x 1060mm H
Per low-rise dwelling with more than 1 bed, when supplied for sole use.	240 litres	740mm D x 590mm W x 1080mm H
Dry mixed recycling allocation		
Per single 1 bed dwelling when supplied for sole use.	140 litres	550mm D x 500mm W x 1060mm H
Per single 2/3 bed dwelling when supplied for sole use	240 litres	740mm D x 590mm W x 1080mm H
Food waste allocation		
Per dwelling	25 litres	350mm D x 300mm W x 360mm H
Garden waste collection is an opt-in subscription service. Any property that has potential to produce garden waste must have adequate and suitable space to store and collect a 240 litre bin alongside all other bins, off of the highway.		

Table 2: Standards for schemes of 6 or more units that are not individually accessed

Refuse allocation	Capacity	3 Approximate bin dimensions
per 6 dwellings	1100 litres	985mm D x 1260mm W x 1370mm H
Dry mixed recycling allocation		
per 10 dwellings	1100 litres	985mm D x 1260mm W x 1370mm H
Food waste allocation		
per dwelling	20 litres	140 litre wheeled bins

Supporting text

The Council is committed to reducing waste and facilitating a step change in the way in which waste is managed. Following the principles of the waste hierarchy, the Local Plan seeks to encourage the re-use, recycling and composting of waste material as a priority over disposal.

- 18.144 All proposals will be expected to consider how waste can be reduced and managed from the design all the way through to the construction and occupation phases.
- 18.145 Data indicates that recycling rates are steadily improving in the borough. The Council will continue to encourage recycling, including through the provision of segregation of waste at source. However, the number of bins required can be unsightly, especially in conversions, and the storage of wastes can cause nuisance in terms of noise and odour. It is therefore important that facilities are well designed and sensitively integrated into developments.
- 18.146 The management of waste in flatted properties poses particular challenges which need to be factored into the design of a building at a very early stage. This policy includes additional requirements in this regard, with the intention of ensuring that occupiers in flatted development are provided with suitable and convenient access to recycling and other waste management facilities, and that waste collection services are not compromised by poorly designed buildings.
- 18.147 Where flatted development includes basement parking provision, the Council expects the options for basement servicing of waste management and collection to have been fully investigated. This avoids compromising the quality and provision of amenity space, forecourts or active ground floor frontages.
- 18.148 The Draft Local Plan has been prepared having regard to the National Waste Management Plan for England.

Policy D13: Residential Extensions

- A. The Council will support extensions and alterations to existing residential building where this maintains or improves the character of the area and does not result in harm to the amenity of neighbouring residents, existing and future occupiers, and the built and natural environment.
- B. Design should respect the character, setting, context and the form and scale of the existing building and any neighbouring buildings, including the quality and size of gardens.
- C. Proposed extensions should be subordinate to the existing building and must not overdevelop the site.
- D. The amenity of the occupiers of adjacent properties should not be unacceptably prejudiced with harm to neighbouring residents minimised including to loss of daylight/sunlight, loss of outlook or by creating an unacceptable sense of enclosure
- E. New rooms created by an extension should comply with space and amenity requirements set out in the London Plan and associated guidance.
- F. Extensions should not harm the character and amenity of private spaces, including rear gardens, and should not harm existing natural habits or trees.
- G. Proposals for residential extensions should be in accordance with design codes or supplementary planning documents where appropriate, including the South Tottenham House Extensions Supplementary Planning Document.

Supporting text

- 18.149 The Council expects that residential extensions and alterations are well designed to create a good quality living environment, whilst protecting the amenity of adjoining neighbours and the integrity of the local residential character.
- 18.150 Extensions to residential buildings should therefore be subordinate in scale to the original building, as well as respect the architectural unity of a block or terrace of houses and the urban grain and character of the surrounding area. New development should not undermine existing uniformity of the building or terrace and should not over balance or dominate existing features important to the building.
- 18.151 Design must be of a high quality and should be site specific respecting and/ or complementing the form, setting, period, architectural characteristics, detailing of the original building, including external features such as chimneys, and porches. High quality matching or complementary materials should be used appropriately and sensitively in relation to the context.

- 18.152 Rear extensions should be lower than the ridge height of the host building. Depth of the rear extension should be such that the resulting footprint is subordinate to the main house and does not have a negative impact on the amenity of neighbouring properties, ensuring no overlooking or inappropriate loss of daylight and sunlight in accordance with Policy D11. Full-width rear extensions are not normally considered acceptable.
- 18.153 Extensions to the roof, such as dormer windows, should be restricted to the rear and their size, location and design should be such that they appear subordinate on the roof. Front dormers would not normally be permitted unless they are already part of the established local character and sensitively designed to contribute positively to the roofscape.
- 18.154 The Council's South Tottenham House Extensions Supplementary Planning Document currently provides for three approved ways in South Tottenham where houses may be extended at roof level. The Council recognises the need to tackle overcrowding and provide borough-wide for additional habitable accommodation for large families. Having regard to this, and explicit support in the National Planning Policy Framework for upwards extensions, the Council will undertake a review of the South Tottenham House Extensions Supplementary Planning Document and consider options to either extend the boundary in which the three approved extension types are acceptable or alternatively to prepare a new design code specifically addressing upwards extensions within Haringey.

Policy D14: Basements and Lightwells

- A. The Council will only support basement development where it is demonstrated that the proposal would not cause unacceptable harm to:
- (1) the stability or bearing capacity of the site and adjacent land, including buildings, infrastructure, and trees;
 - (2) the water environment, including water drainage, ground permeability, run-off and flood risk;
 - (3) the recognised character and amenity of the area, including architectural character and gardens and nearby trees;
 - (4) levels of amenity for adjoining properties by reason of noise or increased levels of internal or external activity;
 - (5) biodiversity values, taking account of the need to maintain adequate soil depth for preservation of landscaping consistent with neighbouring properties; or
 - (6) the significance of heritage assets.
- B. Basement development of existing homes must:
- (1) not comprise of more than one storey;
 - (2) not be built under an existing basement;
 - (3) not exceed 50% of each garden within the property;
 - (4) be less than 1.5 times the footprint of the host building in area;
 - (5) extend into the rear garden no further than 50% of the depth of the host building measured from the principal rear elevation;
 - (6) not extend into or underneath the garden further than 50% of the depth of the garden;
 - (7) be set back from neighbouring property boundaries where it extends beyond the footprint of the host building;
 - (8) avoid the loss of garden space and protect trees consistent with Policy G6; and
 - (9) not include habitable rooms or other sensitive uses in areas prone to flooding.
- C. In determining proposals for basement development, the Council will require applicants to demonstrate that proposals for basements:
- (1) do not harm neighbouring properties, including showing that the scheme poses a risk of damage to neighbouring properties no higher than Burland Scale 1 'very slight';
 - (2) avoid adversely affecting drainage and run-off or causing other damage to the water environment;
 - (3) avoid cumulative impacts;
 - (4) do not harm the amenity of neighbours;
 - (5) provide satisfactory landscaping, including adequate soil depth;

- (6) do not harm the appearance or setting of the property or the established character of the surrounding area;
- (7) protect important archaeological remains; and
- (8) do not prejudice the ability of the garden to support trees where they are part of the character of the area.

- D. During the construction phase proposals must not place unreasonable inconvenience on the day-to-day life of those living or working nearby and construction impacts for the duration of the works should be minimised consistent with Policy D15.
- E. Impact of basement development on drainage, flooding, groundwater conditions and structural stability should be evidenced in the form of a Basement Impact Assessment and where appropriate a Basement Construction Plan. If it is identified that a Basement Construction Plan is required then this will be secured via Section 106 or planning condition.
- F. The Council will generally require a Construction Management Plan for basement developments.

Supporting text

18.155 When this policy refers to basement development this includes basements, lightwells and other underground development. Basements are an increasingly popular way of gaining additional space in the borough's homes can help to make efficient use of the borough's limited land. Basement development and other development that involves excavation does however the potential to cause harm to the amenity of neighbours, affect the stability of buildings, cause drainage or flooding problems, or damage the character of areas and the natural environment. This policy therefore seeks to protect against impacts on the environment and adjoining neighbouring properties and their occupiers whilst still providing opportunities to extend homes downwards where this can be demonstrated to be acceptable. When this policy refers to basement development this includes basements, lightwells and other underground development.

18.156 A basement is a floor of a building which is partly or entirely below ground level. A ground or lower ground floor with a floor level partly below the ground level (for example on a steeply sloping site) will therefore generally be considered basement development

18.157 Some development falls within the scope of permitted development. However, where planning control can be exercised, the Council will seek to appropriately manage adverse impacts including from construction.

- 18.158 The Council will require evidence of the impact of basement schemes in the form of a Basement Impact Assessment to be carried out by appropriately qualified professionals. Basement Impact Assessments are to include geotechnical, structural engineering, and hydrological investigations and modelling to ensure that basement developments do not harm the built and natural environment or local amenity. The level of information required should be commensurate with the scale and location of the scheme. All schemes will be expected to provide evidence against each of the considerations in the policy. Basement Impact Assessments must use the Burland Scale in estimating effects on neighbouring properties.
- 18.159 Basement Impact Assessments must be specific to individual sites and particular proposals. Where hydrological and structural reports are required, they should be carried out by independent and suitably qualified professionals (e.g. Chartered Structural Engineers).
- 18.160 In order to provide the Council with greater certainty over the potential impacts of proposed basement development, we will generally expect an independent verification of Basement Impact Assessments funded by the applicant. The circumstances where verification is required include:
- where a scheme requires applicants to proceed beyond the screening stage of Basement Impact Assessment;
 - where the proposed basement development is located within an area of concern regarding slope stability, surface water or groundwater flow;
 - where there is conflicting evidence; or
 - for any other basement applications where the Council feels that independent verification would be appropriate.
- 18.161 Basement Impact Assessments must contain a non-technical summary of the evidence that applicants have gathered against each stage of the assessment. This should be presented in a format which can be fully understood by those with no specialist technical knowledge in these matters.
- 18.162 The cumulative effect of several underground developments in close proximity can be more significant than the impact of a single basement. The impacts include changes to ground water flow, land stability, surface water flow and flooding. Basement Impact Assessments must consider the potential wider impacts of basement schemes and the potential cumulative impact of other basement schemes in the area.
- 18.163 The demolition and construction phases of a development can have an impact on amenity and this is a particular issue for basements. Many basement schemes are constructed in residential areas in close proximity to people's homes, with the construction works often involving significant disturbance (including removing

significant quantities of spoil) extending for many months. Construction impacts (including noise) are also controlled by other legislation, in particular the Control of Pollution Act, with traffic impacts considered under relevant highways legislation. The Council will seek to minimise the disruption caused by basement development and will generally require Construction Management Plans to be submitted with applications.

18.164 To ensure that basement construction is undertaken without causing damage to neighbouring properties and the water environment the Council may require the developer to provide a Basement Construction Plan in some circumstances. Basement Construction Plans may be required when a Basement Impact Assessment shows acceptable estimated effects but a particular construction methodology needs to be applied to ensure there is no damage to neighbouring properties. If a Basement Construction Plan is required this will be identified in the independent assessment of the Basement Impact Assessment. Basement Construction Plans will be secured by planning obligation.

18.165 A Basement Construction Plan sets out detailed information relating to the design and construction of the basement with a view to minimising the impacts of the development on neighbouring properties and the water environment and provides a programme of measures to be undertaken by the owner with the objective of maintaining the structural stability of the property and neighbouring properties. The developer must also ensure that throughout the construction phase a suitably qualified engineer from a recognised relevant professional body is engaged to monitor, inspect and approve the construction works.

18.166 In addition to protecting against flooding, ground instability and damage to neighbouring buildings as set out above, the Council will also seek to control the overall size of basement development to protect the character and amenity of the area, the quality of gardens and vegetation and to minimise the impacts of construction on neighbouring properties. Larger excavations cause greater construction impacts and can have greater risks and complexity in construction.

18.167 The introduction of light wells where they are not an established and positive feature of the streetscape can harm the character or appearance of an area. Where external visible elements are allowed they need to be located and sensitively designed to avoid light pollution to neighbours and harm to the existing character and appearance of the building, streetscape and gardens in the vicinity.

18.168 When this policy refers to gardens and garden space this includes all outdoor (unbuilt) space on the property, including paved areas, driveways, as well as grassed or landscaped areas.

18.169 As set out in Policy G6 Trees the Council will protect trees. Basement development should be designed to retain and protect gardens and trees. The protection of garden space to support large canopy trees is of particular importance

near to open spaces. Basement development should be designed to avoid damage to trees both on or adjacent to the site, including street trees and the root protection zones needed by these trees. Where there are trees on or adjacent to the site, the Council will require an arboriculture report to be submitted as part of a planning application.

Policy D15: Managing Impacts of Construction

- A. Development proposals that may cause adverse impacts during their construction must submit a Construction/Demolition Management Plan setting out the anticipated impacts of development and how these are proposed to be mitigated.
- B. Construction Logistics Plans may be required for larger developments which have environmental, safety and congestion impacts on the road network and surrounding community.
- C. Development will only be permitted where appropriate actions are proposed to manage the impacts of construction/demolition on communities and the local environment. As a minimum, developers will be required during construction and demolition to:
 - (1) Comply with the Non-Road Mobile Machinery Low Emission Zone and adhere to industry best-practice emissions standards for demolition and construction to limit air, light, dust and noise pollution and minimise fumes, odours, and vibrations from construction and the transportation of construction waste.
 - (2) Ensure that continued use of public highway can be safely accomplished, and to minimise and strictly control vehicular movements to reduce danger to vulnerable road users.
 - (3) Avoid, and/or mitigate impacts on the water supply, sustainable drainage and flood risks
- D. For major developments, the developer should:
 - (1) Sign up to the Considerate Constructors Scheme, and where appropriate a constructors' forum.
 - (2) Identify where other construction projects may be occurring in the surrounding area and take action to ensure any potential cumulative adverse effects are mitigated.
 - (3) Use, where available, construction and/or freight consolidation centres.
- E. During construction developers will be expected to explore the creative use of temporary measures to enhance the public realm.

Supporting text

18.170 Development activity, although temporary, can result in adverse noise, air pollution, vibration, transport, and amenity impacts, on the surrounding area. The Council expects applicants and contractors to avoid, mitigate, and remedy these effects through good site management and early engagement with the Council, local community, affected residents, and other nearby construction projects to address cumulative effects.

18.171 Particular regard should be had to ensuring that disruption of walking and cycling routes during construction is minimised and any diversions are convenient

and clearly signposted. Pedestrian routes through or adjacent to construction zones should be designed appropriately so they are safe, and as direct and attractive as possible.

18.172 Efforts to address construction issues and opportunities should be clearly set out in Construction/Demolition Management Plans and/or Construction Logistics Plans. Further guidance on thresholds, scope and the level of detail expected in these plans will be set out in the Council's validations checklist.

18.173 It is important that cumulative impacts of construction are considered and therefore major development proposals should identify where other construction projects may be occurring in the surrounding area and take action to ensure any potential cumulative adverse effects are mitigated. In areas where cumulative effects from construction are anticipated, such as Wood Green and Tottenham, the Council may require a contribution towards an area-wide constructions logistics officer.

18.174 Developers should explore opportunities to temporarily enhance the local environment during construction, particularly for longer term construction projects, exploring opportunities such as public art, information boards on the development and/ or the local history of the area, wayfinding, and temporary greening.

19. Heritage

Introduction

- 19.01 Our historic environment is a valued resource to both current and future generations. It adds to the beauty of our environment through its design and craftsmanship, preserves stories of past lives and events that hold meaning for local communities, and contains archaeological evidence that furthers our understanding of past human activity.
- 19.02 The National Planning Policy Framework identifies that heritage assets are an irreplaceable resource and requires that they should be conserved in a manner appropriate to their significance. Further it is clear that that Local Plans should set out a positive strategy for the conservation and enjoyment of the historic environment. This Local Plan seeks to deliver on these requirements. Rather than preventing growth, it recognises the historic environment as an enabling resource for placemaking and heritage thus forms a key pillar of our ‘Culturally Rich borough’ Placemaking Priority.
- 19.03 The historic environment supports an inclusive economy by providing a unique competitive advantage, setting our town centres and high streets apart from those in other boroughs. It also contributes to our health and wellbeing, shaping the character of our places, providing a sense of identity and belonging, and enabling us to understand our shared past, in all its diversity. Many of our heritage assets are public buildings and spaces that facilitate social integration.
- 19.04 We also recognise the need to contribute to a fairer and more sustainable and resilient borough by being proactive in both reducing inequities in access to the use and enjoyment of our historic environment and ensuring our heritage assets can sensitively respond to the climate emergency.
- 19.05 The Council has been very active in conservation-led placemaking, particularly in the east of the borough where more heritage assets are identified as being at risk. Successful funding bids have supported several heritage and conservation projects. These include the North Tottenham Townscape Heritage Initiative to restore historic buildings in North Tottenham, and the Tottenham High Road Heritage Action Zone to unlock the economic potential of the Bruce Grove District Centre through heritage.

Policy HE1: Built Heritage Conservation Charter

Conservation Charter

- A. All proposals affecting heritage assets must conserve the significance of those heritage assets, including any contribution made by their setting. The Council will support proposals which achieve this and;
- (1) are informed by, and respond appropriately to, a robust assessment of the significance of the heritage assets affected
 - (2) invest in conservation-led area placemaking, using the historic environment as the basis for good design and positive change
 - (3) bring heritage assets at risk back into beneficial use consistent with their conservation
 - (4) increase inclusive access to the historic environment to promote its beneficial use and enjoyment for all
 - (5) support climate change mitigation and adaptation
 - (6) promote high-quality architecture, streets and open spaces which positively complement the historic environment.

Heritage Impact Statements

- B. All proposals impacting a designated or non-designated heritage asset must submit a Heritage Impact Statement. The Heritage Impact Statement must:
- (1) describe the historic significance of those assets concerned, including any contribution made by their setting
 - (2) provide an assessment of the impact of the proposed development on those assets and their setting
 - (3) have regard to the cumulative impact of incremental changes to those assets, including any contribution made by their setting
 - (4) where a proposal will lead to any harm to, or loss of the significance of a heritage asset, provide a clear and convincing planning justification for this

19.06 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Improve inclusive access to the historic environment

A HEALTHY & SAFE PLACE

Enhance the historic environment's contribution to sense of place and belonging

A SUSTAINABLE & RESILIENT PLACE

Ensure protection of our historic environment for current and future generations
Enable our heritage assets to sensitively respond to the challenges of the climate

Supporting Text

Conservation Charter

- 19.07 The borough's historic environment is an irreplaceable resource which is key to delivering sustainable development in line with the Haringey Placemaking Framework. The Conservation Charter requires that proposals conserve the significance of the heritage assets which make up the borough's historic environment: Listed Buildings, Registered Parks and Gardens, Conservation Areas, and non-designated heritage assets. The Conservation Charter also sets the Council's positive planning strategy for sustaining the borough's historic environment and optimising the enjoyment of heritage assets by both communities and visitors. Locally specific opportunities to achieve this are identified in the neighbourhood chapters and within supporting documents, including Conservation Area Appraisals and Management Plans.
- 19.08 The historic environment is one of the main components of Haringey's distinctiveness. The Council recognises the considerable social, cultural and environmental benefits well-preserved historic buildings and areas bring to the borough. Haringey's historic environment is in many cases valued and well maintained but is also threatened by development pressure, incremental and insensitive change, poorly considered alterations and poor workmanship.
- 19.09 Proposals are expected to identify and take opportunities to realise these benefits by maintaining assets in good condition or rescuing them where they are not. The Council will support proposals which positively contribute to the preservation, restoration and enhancement of the borough's heritage assets, in accordance with [Historic England's 'Constructive Conservation' principles](#).
- 19.10 To support delivery of the Conservation Charter, the Council will:
- take account of established best-practice guidance from Historic England, national amenity societies and other organisations when determining applications for the alteration of heritage assets and/or new development within a heritage setting;
 - produce appraisals and design guidance documents with the input of local groups and other parties, to support Local Plan policies and to enable high quality development within the historic environment;
 - continue the identification of local heritage assets with the input of local people, groups and national amenity societies to ensure recognition and protection of the quality of the built historic environment of the borough;
 - continue to work in partnership with Historic England, neighbouring boroughs and other relevant groups on the protection and enhancement of the historic environment.
- 19.11 The Council's approach to heritage assets is an integrated and balanced one which gives great weight to the preservation of heritage assets as required by both legislation and national planning policy but at the same time recognises the

importance of heritage assets in the context of delivering other key Local Plan objectives. The Council is particularly keen that heritage assets can contribute to addressing the climate emergency and recognises that to make many heritage assets fit for contemporary use they may require changes to deliver energy efficiencies and greater resilience to climate change.

- 19.12 Where this is the case, proposals should demonstrate adherence to Historic England's published technical guidance. Both technical considerations and significance vary greatly from building to building therefore there is no one-size fits all approach to the retrofit of heritage assets. As advocated by Historic England, Haringey supports a 'whole-building approach' to the renovation and/or adaptation of historic buildings, that demonstrates an understanding of a building in its context, and the thermal and ventilation requirements of the historic building fabric, to find balanced solutions that save energy, preserve and sustain heritage significance, and maintain a comfortable and healthy indoor environment. Certain retrofit strategies, specifically those for modern construction, are not always appropriate for all historic buildings. Some works to improve energy efficiency (particularly internal and external wall insulation and underfloor insulation) can cause dampness within a building's structure if they are not properly specified. The Council expects applicants to take specialist advice to guard against maladaptation when considering such interventions. Proposals should have regard to relevant policies in the Climate Emergency and Buildings chapter of the Local Plan.

Heritage Impact Statements

- 19.13 Applicants are required to submit a Heritage Impact Statement where a proposal impacts a designated and/or non-designated heritage asset including its setting. These should be included as part of the Design and Access Statement, where both documents are required. The Heritage Impact Statement must describe the significance of any heritage assets affected, including any contribution made by their setting, and provide an assessment and justification of the impact of the proposal on the assets and their setting, explaining how complies with the policies set out in this chapter. The assessment and justification should, where appropriate, include opportunities to enhance the significance, beneficial use and enjoyment of the heritage asset and their setting and/or improve inclusive access to them.
- 19.14 The incremental loss of architectural and other design details has a cumulative negative impact on heritage assets. Heritage Impact Statements should therefore consider the impact of incremental changes and how this can be avoided or mitigated. Where opportunities arise through new development, proposals should seek to reinstate or restore original features including through the removal of harmful alterations or other inappropriate additions. The reinstatement of historic assets should be done using traditional, original, or historic materials, with the guidance of specialist advice and craftsmanship. Conjectural replacement or reinstatements will be resisted.

19.15 Statements should be prepared by someone of appropriate expertise and make use of available resources including local lists, Greater London Historic Environment Register (GLHER), Archaeological Priority Area Appraisals, Conservation Area Appraisal Management Plans, and the London Gardens Trust inventory. The level of detail provided in statements should be proportionate to the importance of the asset, having regard to its significance. The level of detail should be no more than is sufficient to understand the potential impact of the proposal on the significance of the heritage asset(s). The Council strongly advises applicants to seek the advice of specialist historic consultants, particularly where a proposal is likely to result in significant harm to an asset. The Council also encourages applicants to consult with amenity organisations including the Georgian Group, the Victorian Society, the 20th Century Society, the London Parks and Gardens Trust and other local heritage societies, including Haringey's Conservation Area Advisory Committees.

Policy HE2: Listed Buildings

- A. Development proposals affecting listed buildings and their contributing setting will be supported where they:
 - (1) preserve the special interest of those listed buildings and their contributing setting from harm and conserve their significance;
 - (2) preserve or reinstate original or historic form, fabric, function or character of those listed buildings and their setting;
 - (3) do not harm the structural integrity or stability of those listed buildings or that of adjoining buildings or structures; and
 - (4) restrict proposed alterations and extensions to less significant parts of those listed buildings, so that they relate sensitively to the original buildings and do not adversely affect the internal or external appearance or character of those listed buildings, curtilages or their setting;

- A. When considering the impact of proposals on listed buildings and their contributing setting, the Council will have regard to:
 - (1) the great weight given to the conservation of listed buildings and their contributing setting;
 - (2) the desirability of securing a viable use for those listed buildings consistent with their conservation; and
 - (3) opportunities to secure the future of listed buildings, particularly those on the Historic England 'Heritage at Risk' register.

Supporting text

- 19.16 A list of statutorily listed buildings is published on [Historic England's website](#). Haringey has a diverse range of listed buildings, from the grand 16th century manor house of Bruce Castle (grade I listed) to the 19th century granite cattle trough on Wood Green High Road (grade II listed). Statutorily listed buildings are designated because of their national significance and special architectural or historic interest. Development affecting listed buildings must be supported by a robust Heritage Impact Statement.
- 19.17 Historic England and the Council maintain a [Heritage at Risk Register](#) which identifies listed buildings at risk for a variety of reasons including poor structural condition, vacancy or deterioration of fabric. The Council will work proactively with owners and other stakeholder so support the refurbishment, repair and positive use of Haringey buildings on the register. Appropriate temporary uses will also be considered if this could prevent deterioration or improve the likelihood of sustainable re-use.
- 19.18
- 19.19 The Council will support changes of use of listed buildings where this is causing the least harm to the significance of the building and its setting, and where the use will help secure the building's long-term viability. Restoration of the original use is encouraged where this would enhance the building's significance.
- 19.20 Where proposals may impact listed buildings and their contributing settings, it is important to engage early with the Council's conservation officers.

Policy HE3: Registered Parks and Gardens

- A. Development proposals affecting registered parks and gardens will be supported where they:
 - (1) preserve the special features of interest of those parks and gardens and their contributing setting from harm and conserve their historic significance.
 - (2) preserve or reinstate original or historic form, function, special features or character of those parks or gardens;
 - (3) preserve the setting of those registered parks or gardens and views across, into and out of them;
 - (4) do not harm the structural integrity or stability of historic buildings or structures which form part of the special character of those parks or gardens

- B. When considering the impact of proposals on registered parks and gardens and their contributing setting, the Council will have regard to:
 - (1) the great weight given to the conservation of a registered park or garden and its setting;
 - (2) opportunities to secure the future of registered parks and gardens.

Supporting text

- 19.21 Registered Parks and Gardens are designated because of their special historic interest. Development affecting Registered Parks and Gardens must be supported by a Heritage Impact Statement.
- 19.22 Haringey has 36 historic parks and gardens. Both Alexandra Palace Park and Finsbury Park are on the National Register of Parks and Gardens of Historic Interest, maintained by Historic England. These parks and open spaces serve a wider than local catchment and are of strategic importance in a London context.
- 19.23 National registration means that special consideration should be given to the landscape in the planning process. The Council will consult Historic England and The Gardens Trust on most applications in respect of registered parks and gardens as well as other organisations it considers may have a particular interest in the proposed development.
- 19.24 Temporary events can also have impacts on Registered Parks and Gardens and where these require planning permission they should also be assessed against this policy.

Policy HE4: Conservation Areas

- A. Development proposals, within or otherwise affecting conservation areas, will be required to preserve and, where possible, enhance the character and appearance of those conservation areas and their settings.
- B. Proposals for the full or partial demolition of buildings within conservation areas must be robustly justified having regard to the significance of those buildings to the conservation area as a whole. Demolition of buildings that make a positive contribution will be resisted. Demolition of buildings that negatively contribute will be supported where this enhances the conservation area and is consistent with Policy CE2.
- C. Changes of use of buildings located in Conservation Areas will be resisted where such a change would negatively impact upon the character of the Conservation Area.
- D. When considering the impact of proposals on Conservation Areas and their settings, the Council will have regard to:
 - (1) the priority given to protecting and enhancing the character of those Conservation Areas and their setting;
 - (2) adopted and emerging Conservation Area Appraisals and Management Plans.

Supporting text

- 19.25 Haringey has 28 Conservation Areas which make a major contribution to the character of the borough's places and the quality of life for our communities. The character and appearance of our conservation areas can be affected by development within them as well as development outside them where it is visible from them such as tall buildings. Changes in patterns of use can also erode the character of an areas. It is therefore important that, whenever possible, uses which contribute positively to the character and appearance of conservation areas are not displaced by development, for instance pubs located in historic buildings.
- 19.26 The Council is taking a positive approach to the preservation and enhancement of the these conservation areas which includes preparing detailed [Conservation Area Appraisal and Management Plans \(CAAMPs\)](#) in consultation with local residents and other stakeholders. CAAMPs describe the character and significance of the conservation area and include guidance on maintenance and development within them. They are material considerations in determining planning applications affecting conservation areas and their settings. The Council will continue to prepare CAAMPs until all conservation areas are supported by CAAMPs. We have also implemented [Article 4 Directions](#) in several of our conservation areas which restrict permitted development rights that otherwise had the potential to gradually erode their character.

19.27 Neighbourhood chapters set out area-specific direction on the preservation and enhancement of our conservation areas. Conservation-led placemaking is fundamental to the Council's placemaking strategy, including where conservation areas overlap with our Placemaking Focus Areas. It is particularly important within the small number of conservation areas currently on the Heritage at Risk register.

Demolition and balancing more recent challenges

19.28 All proposals for demolition should have regard to Policy CE2 and the Council's retrofit-first approach. Façade retention is not considered an appropriate justification for demolition in Conservation Areas as it results in the loss of the original design and wholeness of historic buildings and historic structures and will be generally resisted.

Balancing conservation against other priorities

19.29 While Conservation Area Appraisals and Management Plans provide a key evidence base for protecting the historic environment, it should be noted that they do not necessarily reflect all of the key challenges facing the borough, such as responding to the climate emergency and allowing for alterations and extensions to support housing needs, including family housing.

19.30 The Council will expect applicants to demonstrate how proposals have been designed to address a full range of economic, social and environmental challenges whilst conserving the significance of conservation areas, having regard to advice and relevant guidance documents.

Heritage Impact Statements

19.31 Heritage Impact Statements are required for all applications which impact on conservation areas and their settings. Townscape Visual Impact Assessments will not be accepted in lieu of them.

19.32 Heritage Impact Statements should draw on CAAMPs and other guidance documents to clearly set out the character and features that contribute to their special interest and significance. This includes:

- Elements of built form and architectural interest such as the pattern of development, urban grain, siting, building line, rooflines, boundary treatment, the spaces between buildings, building height, massing, scale, proportion, rhythm, fenestration, and materials;
- Landscape, trees, and gardens (In conservation areas, trees that do not have a Tree Protection Order are also protected);
- Views across, to and from conservation areas; and
- Uses

Policy HE5: Non-Designated Heritage Assets and Archaeology

Non-Designated Heritage Assets

- A. Development proposals should seek to conserve and, where possible, enhance and reveal the significance of non-designated heritage assets and their settings including:
 - (1) locally listed buildings
 - (2) identified historic street furniture
 - (3) identified historic parks and gardens
 - (4) assets identified in Conservation Area Appraisal Management Plans
 - (5) assets identified in Neighbourhood Plans
 - (6) other heritage assets identified through the planning application and decision-making process.
- B. In assessing the impact of a proposal on non-designated heritage asset and its setting, the Council will have regard to:
 - (1) its significance,
 - (2) the impact of the proposal on its significance,
 - (3) the public benefits of the proposal
 - (4) the extent to which the proposal and its design has sought to avoid, minimise, and/or remedy impacts on the asset's significance.

Archaeology

- A. Development proposals must conserve heritage assets of archaeological interest and their setting by taking acceptable measures proportionate to their significance.
- B. Applicants are required to submit an appropriate Archaeological Impact Assessment, and where necessary, a field evaluation where:
 - (1) initial assessments indicate the site includes or has the potential to include heritage assets with archaeological interest.
 - (2) the site is within an Archaeological Priority Area
- C. Where heritage assets of archaeological interest are found:
 - (1) priority should be given to preserving and managing the archaeological asset and its setting in situ.
 - (2) where archaeological remains cannot be preserved in situ they must be excavated, recorded, published, interpreted and displayed through a detailed planning programme of works.
 - (3) applicants should ensure adequate arrangements for the investigation, recording and archiving of assets of archaeological importance and engage with the relevant advisory organisation, having regard to London Plan policy HC1.
- D. Proposals that would adversely affect nationally important archaeological remains or their setting will be refused.

Supporting text

Non-designated heritage assets

- 19.33 Non-designated heritage assets have a degree of heritage significance that require consideration in planning decisions, however, do not meet the same criteria as designated heritage assets.
- 19.34 There are several ways in which non-heritage assets can be identified. To provide clarity for applicants, the Council holds a series of lists/ audits of local non-designated heritage assets:
- **The Local List:** a list is currently published on the council's website of over 1100 buildings or structures of architectural or historic interest which make a valuable contribution to the character of an area. A revised list is currently under preparation and will be published in 2026.
 - **Historic Street Furniture:** an audit of the borough's historic street furniture
 - **Register of Public Parks, Gardens, Squares, Cemeteries and Churchyards of Historic Interest:** a register compiled by the London Historic Parks and Gardens Trust in 1996.
- 19.35 This is not a definitive list of non-designated heritage assets. Positive contributing buildings within Conservation Area Appraisal Management Plans are an indicator of significance and potential identification as non-designated heritage. Heritage assets can also be identified through planning applications, for example, during archaeological investigations. Neighbourhood chapters in the Local Plan also provide an indication of areas and buildings of historic character that should be considered as non-designated heritage assets through the planning application process.
- 19.36 The Council will continue to maintain its lists and expand them to include additional assets that contain sufficient heritage significance to be considered non-designated heritage assets
- 19.37 Alterations and extensions to locally listed buildings should retain and where possible restore historic features that contribute to their special interest. They should adopt a retain rather replace approach and, where practical and appropriate, use traditional materials and methods that are in keeping with their special interest. Proposed alterations and extensions should be prioritised on less sensitive parts of the building.

Archaeology

- 19.38 Haringey has a long and rich archaeological history. A range of heritage assets of archaeological interest have been found in the borough, including flint tools from the palaeolithic period, early Iron Age pottery found at the Town Hall Approach in Tottenham, and a large Roman pottery works within Highgate Wood.
- 19.39 Archaeological Priority Areas are locations where there is significant known archaeological interest or particular potential for new discoveries. The borough currently has 22 adopted Archaeological Priorities Areas (APAs).

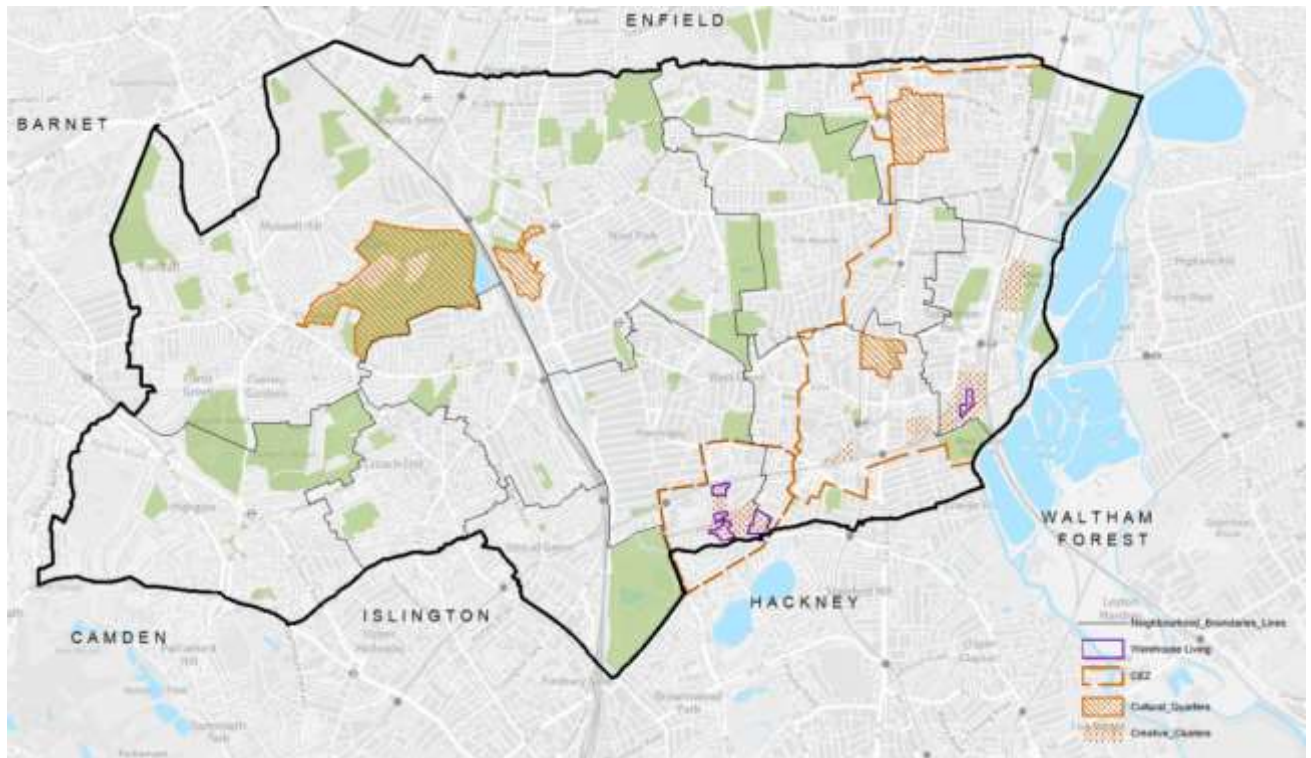
- 19.40 In 2020, Haringey commissioned Oxford Archaeology Ltd to undertake an expert review of the borough's APAs. The APA Appraisal (March 2021) recommends 30 areas for designation as APAs as part of the New Local Plan. These 30 areas include two Tier 1 areas, which are strongly suspected to contain heritage assets of national importance. This plan proposes to adopt these 30 APAs in accordance with the recommendations of the APA Appraisal.
- 19.41 Where archaeological assets of national importance are found these will be subject to the same protections as designated heritage assets.
- 19.42 Archaeological Impact Assessments should identify and describe the significance of the archaeological interest of the site, including any contribution made by the archaeological setting of the site. Any harm or loss of archaeological resource resulting from development will require justification.
- 19.43 Our archaeological heritage provides a key opportunity for placemaking. Proposals are strongly encouraged to reveal, interpret and present archaeological heritage where this would not impact on its preservation or undermine its significance.

20. Culture

Introduction

- 20.01 Haringey is a unique melting pot of people, histories, and voices. Our streets brim with global flavours and echo with the sounds of various languages. Local performers and artists infuse life into every corner of Haringey. This plan seeks to build on Haringey’s unique cultural richness which is one of our greatest strengths.
- 20.02 Our Arts & Culture Strategy (2024) sets out a bold vision to harness the power of culture to unify, inspire, and celebrate Haringey’s communities. It recognises culture as a driver of wellbeing, identity, and inclusive growth, and calls for investment in our cultural assets to build a vibrant, sustainable cultural ecosystem. The strategy is a call to action—to embed culture in placemaking, empower local talent, and ensure every resident can access meaningful cultural experiences and to ensure that the social and economic benefits of culture are felt by our residents.
- 20.03 In 2027, we will be London Borough of Culture, and in 2028 we will host the men’s European Football Championships at Tottenham Hotspur Stadium. Tottenham is also one of only 12 Creative Enterprise Zones in London and is recognised in the London Growth Plan as an internationally significant visitor destination, with the potential to anchor growth in the experience economy
- 20.04 Internationally renowned venues like Alexandra Palace attracting major artists and entertainers, your local pub hosting a quiz night, a warehouse converted into an artists’ studio, the local park hosting a football match, a public square accommodating local buskers, and a house of worship providing space for community activities; all these spaces contribute to the cultural landscape. They help make culture experiences and expression accessible, underpin our cultural and creative economy and bring our communities together, enabling us to learn about each other and the wider world.
- 20.05 Haringey’s cultural infrastructure is a key pillar supporting the rich and diverse culture we offer. It includes our museums, stadiums, parks, music venues, creative workspaces, and community centres—spaces that enable creativity, expression, and connection.
- 20.06 As with many other parts of London our cultural infrastructure is under pressure with competition over scarce land, reduced funding and a difficult economic climate putting a financial strain on these spaces.
- 20.07 The Local Plan responds to these challenges with ambition, making a “Culturally Rich Borough” one of six Placemaking Priorities delivered across the plan. These policies set out how land use and development can help realise that priority and deliver on the NPPF’s aim for planning to support cultural wellbeing—by protecting and

enhancing cultural infrastructure, supporting the creative industries, and embedding culture in the everyday fabric of our neighbourhoods.



Policy C1: A Culturally Rich Borough

- A. The Council will support art, culture, creativity and entertainment that contributes to a culturally rich borough. This will be achieved through:
- (1) the protection and promotion of four Cultural Quarters within Haringey as follows:
 - a Wood Green Cultural Quarter (see Policy WGN2)
 - b Alexandra Palace Cultural Quarter (see Policy MHN2)
 - c North Tottenham Cultural Quarter (see Policy NTN2)
 - d Tottenham Green Cultural Quarter (see Policy SSN2)
 - (2) the protection and enhancement of existing cultural facilities and the delivery of new and replacement cultural facilities in accordance with Policy C2
 - (3) supporting ancillary and meanwhile arts and culture uses consistent with Policy C3
 - (4) protecting public art and supporting new high-quality public art in accordance with Policy C4
 - (5) supporting proposals which contribute to the growth, resilience and positive contribution of the creative industries within the Tottenham Creative Enterprise Zone consistent with Policy C5
 - (6) supporting proposals for new or enhanced warehouse living within selected site allocations in Haringey's Creative Enterprise Zone in accordance with Policy C6.
- B. To ensure a positive contribution to the Council's Placemaking Priority PP1: A Culturally Rich Borough, the following types of proposals must be supported by a Cultural Wellbeing Action Plan:
- (1) Proposals for 100 or more dwellings and/or 10,000m² or more non-residential floorspace
 - (2) Major proposals within Cultural Quarters, Town Centres, and Creative Industry Clusters
 - (3) Proposals involving the loss, in part or whole, of cultural infrastructure.
 - (4) Proposals involving new or significantly enhanced cultural infrastructure.
- C. The Cultural Wellbeing Action Plan should:
- (1) Be informed by available data, engagement with the local community, cultural providers, and the Council
 - (2) Be submitted with the application.
 - (3) Set out how the proposal will address and respond to:
 - a our Placemaking Priority for a Culturally Rich Borough;
 - b outcomes in our Arts & Culture Strategy
 - c the policies in this chapter
 - d relevant neighbourhood placemaking aspirations relating to culture;
 - e local context, character, and cultural strengths and challenges, including addressing known inequities in access to culture and in cultural representation.

- (4) Set out how the proposal will secure the outcomes sought in the Action Plan.
- (5) Where cultural infrastructure is being lost, it should set out what measures are being taken to minimise and remedy that loss.

20.08 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Increases opportunities for everyone to experience art, culture, creativity and entertainment that contributes to cultural wellbeing

Uses culture and the creative industries as a driver for economic growth and a more inclusive economy

A HEALTHY & SAFE PLACE

Promotes positive cultural uses and cultural activities in strategic locations including town centres and the public realm

A SUSTAINABLE & RESILIENT PLACE

Creates high-quality places to support community togetherness and wellbeing

Supporting Text

20.09 This chapter sets out a proactive and strategic approach to delivering a culturally rich borough. Culture is central to Haringey's identity, placemaking ambitions, and inclusive growth objectives. It is one of our key strengths, contributing to community wellbeing, economic resilience, and the distinctiveness of our places.

20.10 The neighbourhood sections of this plan identify four Cultural Quarters within Haringey:

- (1) Wood Green Cultural Quarter
- (2) Alexandra Palace Cultural Quarter
- (3) North Tottenham Cultural Quarter
- (4) Tottenham Green Cultural Quarter

20.11 Each of these contains a concentration of culture and creative activity that plays a vital role in the borough's social, economic, and cultural life. In line with the London Plan, Cultural Quarters are defined as areas where a critical mass of cultural facilities, venues, and related uses are clustered, often supported by complementary activities such as festivals, markets, and public art. These areas offer significant opportunities for cultural production and consumption, placemaking, and inclusive growth. Wood Green's status as North London's Metropolitan Centre and Tottenham's designation as a significant visitor destination in the London Growth Plan further reinforces the

strategic importance of investing in and managing these quarters. To optimise their contribution to the borough's cultural wellbeing, identity, and economy, proposals for these areas should take a holistic and strategic approach to land use, development, investment, and long-term management.

- 20.12 To support its ambitions, the Council will protect existing cultural infrastructure and uses and support the delivery of new and enhanced cultural infrastructure that is inclusive, accessible, and well-designed. This includes formal venues, informal spaces, creative workspaces, and the public realm.
- 20.13 To ensure a considered and coordinated approach to cultural provision—particularly in areas of strategic importance—the Council is introducing a requirement for a Cultural Wellbeing Action Plan (CWAP). This tool embeds culture into land use and development planning and ensures that proposals contribute meaningfully to Haringey's Cultural landscape.
- 20.14 Applicants should engage early with the Council when developing their CWAPs, including with the Culture Team, Placemaking & Inclusive Economy Teams, and local cultural stakeholders. Plans should be informed by local cultural strengths and challenges, and address issues of equity, representation, and access. A wide range of methods may be used to achieve cultural wellbeing, depending on the local context—these may include new facilities, programming, public art, meanwhile uses, or support for community-led activity.
- 20.15 CWAPs will be proportionate to the scale and cultural impact of the development and the Council will provide more detail and guidance on their content and structure.
- 20.16 This approach ensures that culture is not an afterthought, but a core component of planning and development in Haringey.

Policy C2: Cultural Facilities

- A. The Council will support proposals for new cultural facilities within designated Cultural Quarters, Haringey's Town Centre Network, and on identified high streets falling outside it.
- B. To optimise their contribution to a culturally rich borough, proposals for new cultural facilities should:
 - (1) integrate positively with the local network of social and cultural facilities, taking into account their ability to meet existing and future cultural demands.
 - (2) positively relate to adjoining uses and avoiding, mitigating or remedying unacceptable negative impacts.
 - (3) be accessible and inclusive
 - (4) amplify cultural identity and belonging by responding to local context and character, heritage and histories, and the diverse makeup of the local community.
 - (5) foster social interaction, providing space for gatherings, collaborative activities, and cultural exchanges.
 - (6) provide flexible, adaptable spaces that accommodate a wide range of cultural activities, unless doing so would compromise the ability to address identified need for a particular use/uses.
 - (7) be developed through engagement with local stakeholder, cultural organisations and community groups throughout the design process to ensure that the facility designs reflect the needs and aspirations of the intended users.
- C. Replacement facilities will be supported where the new facility is at the same or better standard than the facility which is being replaced and the new facility continues to be accessible to its existing users.
- D. Proposals for new and replacement cultural facilities should have regard to relevant design guidance and standards for cultural facilities when demonstrating that the space has been designed to be suitable for its intended cultural and creative uses.
- E. Proposals involving the loss (whole or part) of cultural facilities will be resisted and will only be permitted where:
 - (1) there is no current or future demand for the facility to continue being used for cultural or alternative community purposes, as demonstrated through robust marketing evidence over a minimum continuous two-year period; or
 - (2) a Cultural Wellbeing Action Plan is provided which demonstrates how the adverse effects of the loss will be adequately mitigated and/or remedied.
- F. In accordance with London Plan Policy HC7, the Council supports the retention of pubs and will only accept the loss of a pub through redevelopment, conversion or demolition where:
 - (3) trading accounts are submitted for inspection covering the last three full years in which the pub was operating as a full-time business; and

- (4) the CAMRA Public House Viability Test, or a similar objective evaluation method, is used to assess the viability of the business and concludes that the public house is no longer economically viable; and
 - (5) it would not result in the loss of a pub that has a heritage, social or cultural value to the local community.
 - (6) when the above criteria are met, alternative Class E, F1 or F2 uses are provided at ground floor where the pub is in a town centre and alternative community and social infrastructure is provided at ground floor where the pub is outside a town centre.
- G. Proposals involving the loss of part of a cultural facility which has potential to render the facility as a whole as unviable for cultural or community use will be resisted
- H. The Council will apply the ‘agent of change’ principle to ensure that existing cultural facilities and uses do not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) will be required to provide suitable mitigation before the development has been completed.
- I. Proposals to enhance existing community facilities will be supported where these benefit users, help ensure the long-term sustainability of the facility and do not have any unacceptable impacts on neighbouring uses or communities.

Supporting Text

- 20.17 Cultural facilities are vital to the social, economic, and cultural life of Haringey. They provide spaces for creativity, learning, celebration, and connection—supporting wellbeing, identity, and inclusive growth. These facilities range from performance venues and galleries to studios, libraries, and informal community spaces. They are often deeply embedded in local communities and play a key role in shaping the borough’s character and sense of place.
- 20.18 While cultural facilities may overlap with social infrastructure in their community value, they are distinct in their primary purpose: to support creative expression, cultural production, and participation in the arts and culture. They also play a key role in supporting the borough’s creative industries and visitor economy.
- 20.19 As a starting point, this policy supports the delivery of new and replacement cultural facilities. It places particular emphasis on directing new facilities to the borough’s Town Centres Network and its four designated Cultural Quarters—Wood Green, Alexandra Palace, North Tottenham, and Tottenham Green—which represent clusters of complementary cultural and creative activity. These areas are central to Haringey’s cultural ecology and offer significant opportunities for placemaking, economic development, and community engagement.

- 20.20 To ensure that cultural infrastructure continues to meet the needs of Haringey's diverse communities, proposals should take a holistic and strategic approach to development in these areas. This includes ensuring that new facilities are well-integrated with existing networks of cultural and social infrastructure, are inclusive and accessible, and respond to local character, heritage, and community aspirations.
- 20.21 Where replacement facilities are being proposed these must be of equal or better quality, accessible to existing users, and designed to minimise disruption to current occupiers and communities.
- 20.22 To support high-quality provision, proposals should be informed by relevant design guidance and standards for cultural facilities. They should also be developed through meaningful engagement with local stakeholders, cultural organisations, and community groups to ensure that new spaces reflect the evolving needs and aspirations of the communities they serve.
- 20.23 It is well evidenced that cultural facilities across London, including Haringey, are under increasing pressure. Rising land values, redevelopment, and competition for space have led to the loss of many cultural venues, particularly those serving grassroots and underrepresented communities. The London Plan, Mayor's Cultural Infrastructure Plan, and Haringey Arts & Culture Strategy (2024) all emphasise the need to protect and enhance cultural facilities, especially in areas of growth and change. Once lost, these spaces are difficult to replace due to their specific spatial, acoustic, and affordability requirements.
- 20.24 This policy contains a presumption in favour of the protection of cultural facilities. Loss of a facility in whole or part will only be permitted in the specific circumstances set out in the policy.
- 20.25 A key barrier for cultural organisations—particularly smaller or community-led groups—is accessing suitable premises. Often, cultural providers are unaware when appropriate spaces become available, particularly in commercial or mixed-use developments. This results in missed opportunities to secure long-term, affordable space for cultural use. To address this, the Local Plan requires that any proposal involving the loss of a cultural facility must demonstrate that the opportunity to retain the existing use or provide an alternative cultural or community use has been explored.
- 20.26 To meet the policy requirement for this:
- (1) The facility must be marketed for appropriate cultural or community uses at or below the reasonable local market value; and
 - (2) Before starting the marketing campaign, applicants must engage with the Council to ensure that the marketing campaign is appropriately targeted.

- (3) Applicants must maintain a log of enquiries and reasons why the facility was not considered suitable and set out why measures to make the facility suitable are not viable, feasible or appropriate.

- 20.27 The policy also requires applicants to provide a Cultural Wellbeing Action Plan where loss is proposed to ensure that any adverse impacts are mitigated or offset. This reflects the borough's commitment to cultural wellbeing as a core planning objective.
- 20.28 Finally, the policy supports the Agent of Change principle, which places the responsibility for mitigating impacts (such as noise) on new development, not existing cultural uses. This is essential for protecting the long-term viability of venues such as music spaces, which are often vulnerable to complaints from new residential neighbours.
- 20.29 Where a scheme proposes the loss of part of a cultural venue, such as cellars or other features of a pub or bar, this must not render the business unviable.
- 20.30 For the avoidance of doubt, the Council's considers public houses to be cultural and community facilities and will protect these for their cultural value as well heritage, economic and social/community value. Pubs support a range of cultural uses, are integral to the music industry, and to supporting Haringey's music heritage, by providing affordable rehearsal and performance spaces - vital to supporting emerging musicians. Pubs also support job creation and contribute to the vitality and vibrancy of the borough's places. Many have a significant social role in the local community and provide a hub for meetings and social interaction. Many are also heritage assets and contribute to the character and history of an area.

Policy C3: Meanwhile, Ancillary and Flexible Cultural Uses

- A. The Council will support the flexible, ancillary, and meanwhile use of spaces for cultural activity in appropriate locations where such uses contribute positively to local character and cultural well-being in accordance with local placemaking aspirations.
- B. Proposals must demonstrate that the cultural use is compatible with the primary use of the space and the surrounding context, and that any potential impacts on amenity, access, or infrastructure are appropriately managed.

Supporting Text

20.31 Cultural activity—including live performance, exhibitions, workshops, and creative production—can play a vital role in animating places, supporting local economies, and fostering community identity. The borough recognises the importance of enabling such uses to occur flexibly and affordably.

20.32 This policy supports:

- Flexible use of spaces for cultural activity, including co-location with other complementary uses.
- Ancillary cultural uses that are subordinate to the primary use where they do not result in a material change of use.
- Meanwhile cultural uses that activate vacant or underused spaces on a temporary basis, particularly in town centres, cultural quarters, high streets and creative industry clusters or during phased development.

20.33 In assessing proposals, the Council will consider:

- The scale, frequency, and nature of the cultural use.
- Its relationship to the primary use and the surrounding context.
- Any potential impacts on amenity, noise, or transport.
- The contribution to local cultural strategies, economic development, and placemaking objectives.

20.34 Where appropriate, planning conditions or obligations may be used to secure the cultural use, manage impacts, or ensure compatibility with neighbouring uses. The Council will also support the use of temporary permissions and meanwhile use agreements to facilitate short-term cultural activation.

Policy C4: Public Art

- A. The Council will support proposals for public art which:
 - (1) are durable and robust, with a strategy for long-term maintenance.
 - (2) do not compromise the intended use of the building or space.
 - (3) protect and enhance local character and historic significance.
 - (4) do not harm inclusive design outcomes.
 - (5) are visible and able to be enjoyed from a publicly accessible location.
 - (6) do not undermine traffic safety.
- B. The Council will resist the loss of good-quality public art (including statues, memorials, murals and examples of historic street furniture). Where retention of a permanent art work is demonstrated not to be possible, the harm from its loss should be mitigated and remedied through a Cultural Wellbeing Action Plan.
- C. Within Haringey's Town Centres Network, Cultural Quarters and Creative Industry Clusters, the Council will seek for proposals to provide, or contribute towards, new public art and/or the restoration or repair of existing public art in the neighbourhood. Contributions will be sought from all proposals which require a Cultural Wellbeing Action Plan.
- D. Proposals for public art are encouraged to celebrate local culture, character, and histories, particularly those of groups less represented in the built environment. Engagement and co-design with local communities is strongly supported from the commissioning process all the way through to installation.
- E. Community-led street art will be supported. Proposals are encouraged to incorporate a strategy for providing and maintaining space for community-led street art.

Supporting Text

- 20.35 Public art plays a vital role in shaping Haringey's identity, animating public spaces, and fostering a sense of belonging and local pride. It can reflect the borough's diverse communities, celebrate local histories and people, and contribute to inclusive placemaking. Public art includes permanent installations such as sculptures, murals, and memorials, as well as temporary and community-led, visual art works that activate the public realm and support cultural expression.
- 20.36 Haringey's rich cultural and built heritage and dynamic creative communities offer significant opportunities to embed public art into the fabric of the borough. From the historic civic spaces of Wood Green and Tottenham Green to the vibrant street art culture in Seven Sisters and the creative energy of the Tottenham Creative Enterprise Zone, there is a strong foundation for expanding and diversifying the borough's public art offer and ensuring it contribute to wider placemaking ambitions.

- 20.37 This policy supports the integration of public art into development and placemaking projects, particularly in town centres, high street, Cultural Quarters, Creative Industry Clusters, and areas of high footfall. It encourages developers to work with artists, cultural organisations, and local communities to co-design artworks that are meaningful, inclusive, innovative and contextually responsive. Public art should be visible, accessible, and designed to endure, with clear strategies for long-term maintenance.
- 20.38 The Council will resist the loss of high-quality public artworks, including historic street furniture and murals that contribute to local character. Where loss is unavoidable, mitigation should be secured through a Cultural Wellbeing Action Plan. Contributions towards new or restored public art will be sought from developments that trigger this requirement, ensuring that cultural value is retained and enhanced.
- 20.39 Artist-led, co-designed street art is also supported as a form of grassroots cultural expression. The Council encourages proposals that provide space and support for community-shaped initiatives, particularly those that give a voice to underrepresented groups and reflect the borough's evolving cultural narratives.

Policy C5: Tottenham Creative Enterprise Zone

- A. The Council seeks to support the growth, resilience and positive contribution of the creative industries within the Tottenham Creative Enterprise Zone. To help achieve this the Council will:
 - (1) require the delivery of affordable employment space in line with Policy EI4.
 - (2) prioritise the delivery of new creative workspace within designated Creative Industry Clusters.
 - (3) encourage and support the temporary use of vacant buildings and sites for workspaces catered to creative and cultural activities.
 - (4) support a wide range of complementary commercial, cultural and community uses along the Tottenham High Road corridor and within Tottenham's district and local centres.
 - (5) support new creative workspace within the emerging North Tottenham District Centre and Tottenham Hale District Centre.
- B. Proposals within Creative Industry Clusters involving the loss of Class E(g), light industrial and Sui Generis workspace currently occupied by or suitable for use by the creative industries will only be supported where:
 - (1) an equivalent or increased amount of floor space suitable for the creative industries will be re-provided, subject to viability, market demand and site suitability; and
 - (2) there is a positive strategy in place to support the relocation of existing businesses where these cannot be accommodated within the redeveloped site.
- C. Major development proposals within Creative Industry Clusters should set out in the submitted Placemaking Strategy how they will enhance the positive contribution of the cluster in which they are located. This includes, but is not limited to, contributions to economic vitality, cultural identity, industrial heritage, collaboration

Supporting Text

- 20.40 Creative Enterprise Zones (CEZs) are a Greater London Authority initiative designed to support the capital's creative economy by securing affordable workspace, nurturing local talent, and embedding creativity into regeneration. Haringey's CEZ—Made by Tottenham—is one of the most distinctive in London, reflecting the borough's strengths in music, fashion, and cultural production.
- 20.41 Tottenham is home to a dense network of creative businesses, including many music studios and some internationally recognised recording facilities. Alongside this, the borough supports a growing fashion and design sector, forming part of the wider London Fashion District, identified in the London Growth Plan as a key location for fashion innovation and small-scale manufacturing.
- 20.42 While the wider Local Plan supports the delivery of affordable workspace across the borough, this policy focuses specifically on the needs of the creative industries within

the CEZ. Shaping Tottenham, Opportunity Haringey and the Haringey Workspace Study (2022) highlight the vulnerability of creative businesses to displacement due to affordability pressures and redevelopment, and the need to protect and expand suitable workspace in areas where creative activity is already concentrated.

- 20.43 This policy therefore seeks to secure new creative workspace, particularly within designated Creative Industry Clusters, and to resist the loss of existing workspace that is suitable for creative and light industrial uses. It also recognises the opportunity to deliver new creative workspace in the emerging North Tottenham District Centre, complementing the adjacent North Tottenham Cultural Quarter, and in Tottenham Hale, where new development can support and benefit from surrounding creative clusters.
- 20.44 While Tottenham's creative economy is incredibly valuable, much of its activity remains hidden from view. It is important that the vibrancy and innovation taking place within Creative Industry Clusters is made more visible. Proposals should therefore enhance the amenity and character of these areas as creative destinations and strengthen their ability to benefit from the co-location and collaboration that defines successful creative ecosystems.

Policy C6: Warehouse Living

- A. To protect the important cultural, creative and economic contribution of existing warehouse living sites, the Council has made provision for warehouse living within selected site allocations within creative industry clusters in the Tottenham Creative Enterprise Zone.
- B. Within site allocations which provide for warehouse living, there will be a presumption in favour of the retention of warehouse living uses. The Council will support enhancement of existing warehouse living accommodation and expects proposals to take a retrofit first approach to development.
- C. The intensification of existing warehouse living accommodation will be supported provided that this does not:
 - (1) undermine the primary employment function of the employment area it resides in; and
 - (2) result in a loss of dedicated workspace; and
 - (3) detract from the affordable, collaborative and communal nature of the existing living and working environment.
- D. The Council will resist changes to the layout, use or management of existing warehouse living units that reduce creative production space unless this is to enable an existing property to meet environmental health or health and safety requirements while maintaining its overall purpose and function as warehouse living.
- E. The Council will support the comprehensive redevelopment of warehouse living accommodation for new warehouse living only where proposals:
 - (1) are informed by a masterplan;
 - (2) will not undermine the primary employment function of the area the site is located in;
 - (3) deliver an uplift in dedicated employment space/workspace;
 - (4) are designed to provide an adequate living standard, including meeting health, fire safety, and environmental performance standards.
 - (5) have been designed to enable residents to undertake a range of creative production activities not provided for in conventional housing or co-living and have had regard to design guidance and standards for creative workspace
 - (6) are shaped through collaborative engagement with the host community and the local creative industry community to ensure the product meets the needs of creative work and provides an appropriated standard of living for the integrated residential element;
 - (7) are designed to support genuine communal living that fosters shared creative and domestic life and engages positively with the wider creative cluster;
 - (8) are demonstrated to be affordable when compared against alternative scenarios for the creative community to secure living accommodation plus space for creative production;

- (9) make provision for adequate yard space, servicing access and infrastructure to support material deliveries, waste storage and management, and other operational needs of creative production;
- (10) demonstrate how they will avoid the displacement of existing residents, with particular emphasis on those actively engaged in creative industry work within the space;
- (11) are supported by a Management Plan that includes a strategy for maintaining the creative use of the space

F. Warehouse living proposals of any type will not be supported unless the provision of warehouse living is specifically provided for by a site allocation.

G. Live/Work proposals are not supported by the Council in any location.

Supporting Text

- 20.45 Warehouse living is a specific type of land use that emerged over time in certain employment locations in Haringey. It is characterised by the provision of a low-cost, collaborative and communal living and working environment and forms part of a unique and valuable ecosystem of integrated living and creative production which particularly supports the borough's creative industries and creative economy.
- 20.46 Existing warehouse living sites spaces have played a vital role in sustaining and growing creative production by supporting informal networks, shared resources, and a culture of experimentation. This policy seeks to secure the continuation and expansion of warehouse living in response to increasing pressures on affordability in both housing and creative workspace, ensuring that creative industry workers can remain embedded in the communities and clusters that fuel their work and contribute to the borough's cultural and economic vitality.
- 20.47 The Council has identified specific site allocations within the Tottenham Creative Enterprise Zone for the provision of warehouse living. These locations have been selected due to their location within established creative industry clusters, with an existing warehouse living population and their potential to sustain and grow the borough's cultural economy.
- 20.48 A retrofit-first approach helps avoid disruption to the existing creative ecosystem, including the displacement of residents. It can also support the preservation of the industrial character and heritage that define many creative clusters.
- 20.49 Many buildings will require retrofitting to meet modern safety and environmental standards. The Council will support refurbishment and retrofit works that improve safety, sustainability, and living conditions, while also helping to ensure they support creative production.
- 20.50 Warehouse living must be designed to support both creative production and communal living. Proposals must clearly demonstrate how the design responds to

creative workspace and meets housing guidance and standards, including the Council's Workspace Design Guidance, and the GLA's Housing Design Standards, as well as feedback from engagement with the host community and wider creative community. Proposals must be designed to support creative production that is unable to be undertaken in conventional housing or co-living for example maker activities as opposed to laptop-based activities.

- 20.51 Where the proposal departs from these standards it should be clearly demonstrated that this will not impact on the ability of spaces to be meaningfully used for creative production and that an appropriate standard of living is provided, including complying with health and safety requirements.
- 20.52 Proposals must include well-integrated communal spaces for cooking, working, and socialising, designed to encourage interaction and collaboration. Developments should demonstrate how communal living will connect with the wider creative community, including opportunities to display work and hold creative events and activities.
- 20.53 To ensure warehouse living provides an affordable product for people working in the creative industries, it should be demonstrated that warehouse living is affordable compared to alternative scenarios for the creative community to secure living accommodation plus space for creative production.
- 20.54 Whether through retrofit or redevelopment, proposals should take active steps to avoid displacement of existing residents. This includes:
- 20.55 Retaining existing residents and users where possible through phased development, temporary relocation strategies, or right-to-return provisions.
- 20.56 Ensuring that any redevelopment or intensification proposals do not undermine the social, cultural, or economic fabric of the existing creative community.
- 20.57 Providing evidence of early and ongoing engagement with affected residents and local creative stakeholders to co-design solutions that support continuity of occupation and creative production.
- 20.58 The process of securing, managing, and monitoring creative use of the development should be set out in a Management Plan.

21. Climate Adaptation and Resilience

Introduction

- 21.01 Haringey is facing increasing impacts and risks related to climate change as evidenced by recent floods and heatwaves. In this context, it is vital that the borough takes steps to adapt to climate change and build resilience against it.
- 21.02 Climate adaptation and climate resilience are closely related concepts, but they focus on different aspects of addressing climate change. Climate adaptation refers to the process of adjusting to the effects of climate change. It involves understanding the effects or likely effects of climate change, such as extreme heat, storms or droughts, and taking proactive action to prepare for, adapt to and minimise these. For example, this would include sustainable urban drainage schemes to manage rainwater runoff and reduce flood risk. Climate resilience, on the other hand, means building capacity to withstand and recover from climate-related stresses and shocks. A resilient system can continue to operate despite the changes or challenges posed by climate change. An example of this would be planting trees to help management of extreme heat in urban areas.
- 21.03 The Council has already taken steps to adapt to climate change and improve the borough's resilience to negative impacts. These include:
- declaring a Climate Emergency
 - adopting a Climate Change Action Plan
 - expanding coverage of cool spaces in the borough
 - setting up an Adverse Weather and Health Group (AWHG)
 - undertaking evidence building and vulnerability mapping analysis, including through the Council's Joint Strategic Needs Assessment (JSNA)
 - installing Sustainable Urban Drainage (SUDS) schemes across the borough and undertaking investigations in response to the 2021 floods; and
 - preparing a Climate Resilience and Adaptation Plan.
- 21.04 The new Local Plan seeks to contribute further in this regard and, consistent with Chapter 14 of the NPPF, takes a proactive approach to adapting to climate change, taking into account the long-term implications for flood risk, water supply, and the risk of overheating and drought from rising temperatures.
- 21.05 Adapting to climate change and building resilience to it is at the heart of our new Local Plan, forming the basis of the Placemaking Objective to achieve a 'Sustainable and Resilient Place, with strong communities, a regenerating natural environment and on target to be net zero carbon by 2041'. Policies which support climate adaptation and climate resilience in Haringey are woven throughout all chapters of this plan. This

dedicated chapter provides detailed policies to ensure that development proposals respond appropriately to flood risk, overheating, drought and subsidence and air pollution risks. In doing so it aims to ensure that our communities and infrastructure are prepared for the impacts of climate change, safeguarding health and wellbeing for everyone - especially Haringey's most vulnerable residents.

Policy CR1: Climate Adaptation and Resilience

- A. The Council will act to ensure the borough and its communities are able to adapt to a changing climate and have sufficient resilience to withstand, and recover from, the increasing frequency and risk of extreme weather events. To achieve this, the design and location of development will be required to:
 - (1) Support urban cooling and minimise any contribution to the urban heat island effect in accordance with Policy CR2
 - (2) Minimise overheating risk in buildings in accordance with the Haringey Cooling Hierarchy set out in Policy CR3
 - (3) Manage and reduce flood risk consistent with Policy CR4
 - (4) Control surface water-run-off in accordance with Policy CR5
 - (5) Ensure a high standard of water efficiency in line with Policy CR6
 - (6) Avoid and/or address subsidence risks in accordance with Policy CR7
 - (7) Prioritise the improvement of air quality in accordance with Policy CR8.
- B. Wherever possible, proposals should utilise nature-based solutions to address climate change risks.
- C. Proposals must be informed by an understanding of which areas and populations in the borough are most vulnerable to negative impacts of climate change and will be required to demonstrate how potential impacts on those at higher risk will be avoided and/or satisfactorily addressed.
- D. Proposals should complement and integrate with strategic borough-wide measures to address risk from climate change.

21.06 This policy contributes to the Haringey Placemaking objectives as follows:

A SUSTAINABLE & RESILIENT PLACE

Requires development to be located and designed to respond and be resilient to a changing climate and increased climate risks.

A HEALTHY & SAFE PLACE

Ensure people are comfortable inside buildings, particularly in the context of a changing climate

A FAIR PLACE

Recognises that climate change affects vulnerable populations and locations more severely, and requires development to address these impacts by prioritising protection and support for those most at risk

Supporting Text

Climate resilience in London

- 21.07 The UK Climate Projections (CP18) forecast that by 2061 London could see an increase in average temperatures ranging from 2°C to 6°C. While the total annual rainfall is projected to stay roughly in line with current levels, the distribution of rainfall is expected to shift, with drier summers, wetter winters, and more frequent intense storms and prolonged dry spells in general.
- 21.08 The London Climate Resilience Review (2024) identifies several key climate risks the city is expected to face because of its changing climate, highlighting the importance of protecting vulnerable groups. In particular, the review identifies a heightened risk of:
- overheating;
 - flooding (particularly from surface water and sewer surcharges);
 - drought;
 - storms;
 - subsidence; and
 - wildfires.
- 21.09 The impacts may also give rise to secondary risks such as increased risk of diseases caused by increased temperatures.
- 21.10 The above mentioned risks bring significant costs to our economy, ecosystems, infrastructure and impact our health and wellbeing. It is essential that new development is located and designed so that our buildings, public spaces and infrastructure can adapt to our changing climate and remain resilient over their lifetime.

Prioritising nature-based solutions

- 21.11 Nature-based solutions to increasing climate resilience should be prioritised because they provide additional social, economic and environmental benefits, are cost-effective, and support greater long-term resilience by harnesses biodiversity and ecosystem services. They should be well-integrated into proposals using a designed approach, in accordance with Haringey's Green & Blue Infrastructure principles.

Protecting vulnerable groups

- 21.12 Climate risks will have a higher impact on vulnerable populations. During the summer of 2022 heatwave, the borough suffered 21% higher excess deaths compared with the 5-year average. The largest increases in excess deaths occurred in care homes and more deaths were recorded amongst rough sleepers during the summer compared with winter.
- 21.13 Proposals should identify climate-related impacts on vulnerable populations and demonstrate how these will be addressed through the development. The Greater London Authority (GLA) has produced a climate risk map, identifying areas within

London that are most exposed to climate impacts with high concentrations of vulnerable populations. In addition, the Council's Public Health department produces Joint Strategic Needs Assessments that identify local impacts on health and wellbeing, including from climate risks.

Strategic borough-wide measures

- 21.14 Following recommendations from the London Climate Resilience Review (2024), the Mayor of London is beginning work to develop a clear strategic vision and delivery plan for a climate-resilient London. The Council is committed to working collaboratively and positively with the Mayor of London to support this work.
- 21.15 The Council is preparing a Climate Resilience and Adaptation Plan which sets out strategic measures that are being undertaken to strengthen the borough's climate resilience.
- 21.16 Proposals should have regard to local and regional climate resilience strategies and, where appropriate, contribute to strategic schemes that improve climate resilience through direct delivery or financial contributions.

Policy CR2: Supporting Urban Cooling

- A. Proposals must help to deliver urban cooling and avoid worsening the Urban Heat Island effect. To achieve this, proposals should:
 - (1) be informed by urban heat island mapping of Haringey and demonstrate a positive response to identified risks.
 - (2) through their urban form, surface treatment and orientation of buildings, contribute to passive cooling and shading in proposed external amenity space, and the public realm and support heat and sunlight dissipation during heat waves;
 - (3) maximise nature-based solutions to improve evaporation cooling and provide shading;
- B. Proposals that capture waste heat from development proposals or existing buildings or transport infrastructure for beneficial use will be supported, having regard to policy CE5.
- C. All major development which is providing public or communal space and is in an area where there is a deficiency of cool spaces should include either an indoor or outdoor Cool Space which, as a minimum, meets the 'tier 2' standard of the GLA 'Cool Spaces' criteria.

Supporting text

21.17 Urban cooling is a critical strategy for addressing rising temperatures in London and protecting the health and wellbeing of Haringey's residents against the impacts of climate change.

21.18 As average annual temperatures continue to rise due to climate change, overheating is impacting everyone. However, protection from overheating is particularly important for heat vulnerable groups who are not as able to adapt to changing environmental conditions, such as older people, young children, people suffering from chronic illness, disabled people and people living in poverty. In extreme situations heat exposure can have serious health implications and in the worst cases it can lead to fatalities.

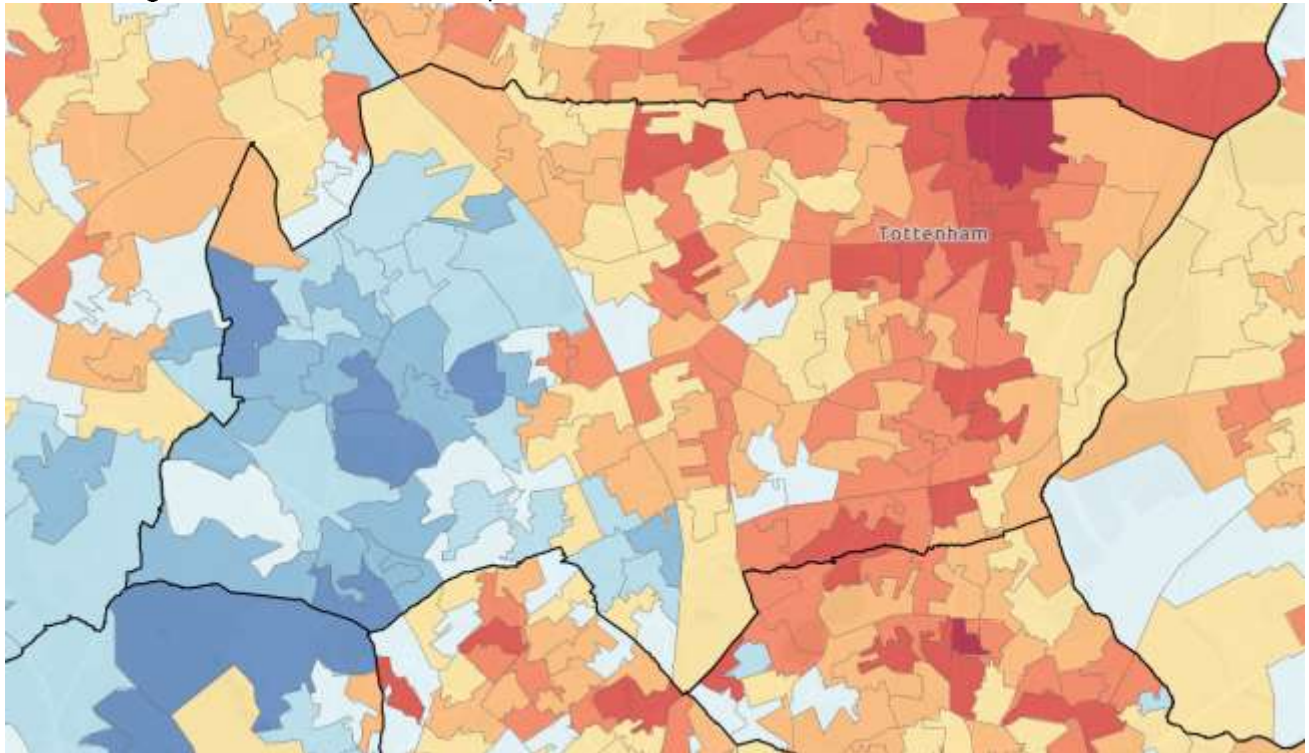
The Urban Heat Island effect (UHI)

21.19 The Urban Heat Island effect (UHI) refers to higher average air temperatures in urban areas compared to rural areas. London can be up to 10 degrees warmer than neighbouring rural areas. This happens for a variety of reasons but includes a lower amount of trees and other vegetation, an increased amount of hard, reflective urban surfaces which radiate heat, and a higher concentration of heat sources. Due to climate change, Haringey is experiencing hotter and drier summers that are further intensified by the UHI.

Heat risk

21.20 Urban cooling measures should be prioritised in areas of higher heat risk. The GLA has produced the London Climate Risk Maps which show climate vulnerabilities, including heat risk, at the borough level. Applicants should use this data and, if appropriate, undertake additional site-specific heat mapping analysis of the local area to ensure an appropriate response to climate risks.

21.21 In Haringey, vulnerability to heat risk is concentrated overwhelmingly in the east of the borough, as shown on the map below.



*London Climate Risk Map showing heat risk in Haringey
(Image source: [GLA website](#))*

Urban form

21.22 Proposals should demonstrate how they will contribute to passive cooling and shading, supporting heat and sunlight dissipation in the external environment during periods of extreme hot weather. In assessing potential impacts, applicants should consider how spaces are used, for example whether people are passing through or expected to dwell in the space or if there are vulnerable users.

21.23 The urban form should be designed to provide sufficient shading through layout, height, bulk and massing to prevent overheating. For example, this could include buildings providing shade to a proposed courtyard or play area during summer months at hotter times of the day.

21.24 External shading is one of the most effective ways to reduce overheating risk within buildings and in the public realm. Where nature-based solutions cannot be sufficiently provided, external shading solutions in combination with seating areas should be explored to provide comfortable rest spaces during warmer months.

21.25 Solutions must be design-led, having regard to Haringey's Design and Heritage policies and established design guidance including the [Good Homes Alliance Shading Design Guide](#).

Surface treatments to support urban cooling

21.26 Urban surfaces with a high solar reflectance, or albedo, enable heat to be quickly radiated back into the atmosphere without retaining the heat. Conventional materials, such as red brick, will have a lower albedo and retain more heat at the building structure which is radiated back into the atmosphere when surrounding temperatures drop. Lighter coloured surfaces, such as white, have a higher albedo or solar reflectance.

21.27 Appropriate measures to support cooling can include:

- Cool roofs with light-coloured materials (high albedo) if not proposing a living roof
- Lighter-coloured façade materials
- Cool pavements (high albedo)

Measures must be design-led and must have regard to Haringey's Design and Heritage policies.

Nature-based solutions

21.28 The cooling benefits of green and blue space in cities is critical to maintaining comfortable air temperatures in our warming climate and should be considered early in the design process. Appropriate measures include providing new green spaces, tree canopy cover, sustainable urban drainage systems, living roofs and walls, pergolas with climbing plants, and incorporating blue infrastructure like lakes and water features.

Cool Spaces

21.29 'Cool Spaces' are indoor or external spaces for Londoners to shelter from the sun, cool down, rest and take respite during heat waves. Cool Spaces must be designed in accordance with the [GLA's detailed criteria for the provision of Cool Spaces](#).

21.30 Overheating is a public health emergency and as such the Council must ensure that residents and visitors alike have easy access to Cool Spaces. As such, proposals will be required to provide them in locations where local deficiencies are identified.

21.31 The New Local Plan seeks to ensure there are Cool Spaces within a 10-minute walking distance (or 800m) of all homes, in accordance with GLA guidance, Public Health England guidelines and the [NHS Heatwave Plan](#). The [GLA's Cool Spaces map](#) identifies gaps in provision in Haringey. Where Cool Spaces are not already available

within an 800m distance from residential areas, major development that provides public or communal space must meet the 'Tier 2' indoor or outdoor Cool Space criteria.

- 21.32 Cool spaces should be able to continue to function during national grid power outages.
- 21.33 It is important for people to have access to water, particularly during heat waves. Developments should, where appropriate, contribute to or deliver water fountains in areas of deficiency as part of providing Cool Spaces.

Policy CR3: Minimising Overheating Risk in Buildings

- A. Proposals must minimise overheating risk in new and existing buildings in accordance with the Haringey Cooling Hierarchy, which sets a hierarchy of highest priority measures (1) to lowest priority measures (8):

Haringey Cooling Hierarchy

- (1) Integrate external shading into all building openings except facades that face due north.
- (2) Minimise the amount of heat entering a building by using passive cooling measures (including building orientation and natural ventilation).
- (3) Minimise internal heat generation through energy efficient building services design.
- (4) Prioritise natural ventilation, avoiding single aspect dwellings.
- (5) Manage heat within the building through exposed internal thermal mass and high ceilings.
- (6) Provide mechanical ventilation where necessary.
- (7) Provide active cooling only where robustly justified and it is demonstrated that the above passive measures have been prioritised.
- (8) Demonstrate a retrofit plan with feasible mitigation measures that will mitigate more extreme heatwaves in the future.

- B. Proposals must demonstrate that waste heat from building services is minimised and has been located to mitigate negative heating impacts on future occupants and neighbouring sites.

- C. Overheating assessments must be undertaken for all buildings where people spend a significant amount of time.

Supporting text

- 21.34 In the past, buildings in Haringey were not typically designed to adapt to heat waves as heat waves were infrequent events and when they did occur they did not last for long. Today, overheating risk in buildings poses a significant and increasing risk to public health and well-being and is also contributing to global warming as people turn to active cooling solutions that are energy-hungry and increase carbon emissions. As such, it is essential that buildings in Haringey are designed to minimise overheating risk.
- 21.35 Overheating can occur in both existing and new buildings with impacts depending on the uses and design of the building, as well as the vulnerability of its occupants, their adaptability and thermal comfort ranges, and their ability to control internal temperatures.

21.36 Mitigation measures must therefore be integrated as part of all proposed development, including retrofit projects, strengthening climate resilience and reducing the need for retrofitted active cooling such as fans or air conditioning which rely on external power sources to remove heat. Avoiding active cooling will also reduce additional energy demand and heat exhausts associated with active cooling, which worsen London's urban heat island effect.

Haringey Cooling Hierarchy

External shading

21.37 External shading is the most effective way to prevent overheating. In particular, south and west facing windows should be shaded as the most effective way to prevent overheating. Shading should be designed to allow passive solar heat gains during cooler months, when the sun is at a lower angle in the sky.

21.38 External shading may include:

- architectural features such as overhangs or inset balconies
- shutters
- louvers
- brise soleil
- awnings
- pergolas (in combination with climbing plants)

21.39 Curtains and internal blinds have minimal impact on overheating as the solar heat gains have already passed through the glass and will heat up internal air between the curtains/blind and glass that will then circulate internally. This is therefore not an acceptable mitigation measure.

21.40 External shading has a visual impact on the external appearance and character of proposals and as such should have regard to this plan's design and heritage policies.

Passive cooling measures

21.41 Passive cooling is about designing buildings so that indoor spaces are comfortable and avoid overheating while remaining energy efficient. Proposals should take a design-led approach to integrating passive cooling measures in new and existing buildings. The most impactful measures require consideration during early design stages as they can have an impact on the visual appearance of buildings. Passive cooling measures may include:

- building massing and orientation;
- layout (e.g. dual or triple aspect for cross-ventilation);
- window-to-wall ratio (known as 'glazing ratio');
- external shading (to openings);
- high albedo materials;
- well-insulated building envelope;
- exposed thermal mass;
- high ceilings; and

- the provision of greenery directly adjacent to the building that provides external shading to glazing (Nature-based Solutions).

Energy efficient building services design

- 21.42 Building services should be designed to minimise heat losses from heat distribution infrastructure in habitable spaces and corridors, and use efficient appliances. Reducing hot water usage will also help to reduce heat losses.

Prioritising natural ventilation

- 21.43 The location, orientation and layout of buildings and their openings should be considered early in the design process to support natural ventilation, provide shading, and manage exposure to sunlight. Dual or triple aspect layouts are preferred for residential proposals to support cross-ventilation.

Exposed thermal mass

- 21.44 Proposals should be designed to use materials with high thermal mass, such as concrete, brick, or stone, where appropriate, as they can absorb heat during the day and release it slowly at night. This should be paired with ventilation to purge excess heat at night, and high ceilings, which allow hot air to rise and cooler air to stay at occupant level, naturally regulating temperatures.

Mechanical ventilation

- 21.45 Mechanical ventilation should always be combined with passive cooling measures to improve effectiveness. Passive night ventilation (night purge cooling) can be used to flush out warm indoor air at night when outdoor temperatures are lower, to reduce overheating in naturally ventilated buildings. This works best in buildings with high thermal mass which absorb heat during the day and release it at night.
- 21.46 All mechanical ventilation heat recovery (MVHR) systems should include an automatic summer bypass mode to reduce overheating risk during summer months.
- 21.47 Mechanical ventilation with pre-cooling (evaporative cooling or earth tubes) may also be considered as part of mitigation measures.

Active cooling

- 21.48 Active cooling, including air conditioning and reversible air source heat pumps (that provide cooling), will be resisted and will only be accepted where justified through dynamic thermal modelling which proves that all other mitigation measures have been exhausted.
- 21.49 Where active cooling systems are proposed, they must be demonstrated to be the lowest carbon option available, be designed very efficiently to reduce costs for occupants and reuse waste heat that is produced. Applicants must demonstrate that all opportunities to connect to low carbon heating systems have been explored and that the cooling demand is reduced to less than 15Wh/m²/year.

Minimising waste heat

- 21.50 Proposals should demonstrate how the placement and design of heat pumps and air conditioning units (only where robustly justified) have been designed to avoid adverse impacts of waste heat on the surrounding environment.

Overheating risk assessments

- 21.51 Overheating assessments should be undertaken for any buildings where people spend a significant amount of time.

- 21.52 Overheating risk assessments should be prepared in accordance with the GLA's Energy Assessment Guidance.

- 21.53 Major development proposals should include:

- A method statement demonstrating application of the Cooling Hierarchy
- A massing and shading study which demonstrates how urban form and orientation are designed to mitigate overheating risk in buildings. 3D modelling is encouraged.
- Dynamic thermal analysis demonstrating compliance with CIBSE TM59 (residential developments and residential institutions), CIBSE (naturally ventilated non-residential developments, and/or CIBSE Guide A (mechanically ventilated non-residential developments), or equivalent guidance as updated.
- Modelling of current and future weather files, complying with the current 2020s and 2050s weather file for Design Summer Year (DSY) 1 and demonstrating through a retrofit plan how the development will comply with future mitigation measures for DSY2 and DYS3 (2020s), and DSY1 (2080s) weather files.
- Submit a 'retrofit guide' to demonstrate how the building(s) can easily be retrofitted with mitigation measures (in line with the Cooling Hierarchy) to ensure it does not overheat in more extreme weather events (DSY2 and 3 under 2020s) and future (2080s), how this will be managed and delivered and who will manage the overheating risk when the development is occupied.
- Modelling for developments accommodating vulnerable users should apply user occupancy profiles in accordance with current GLA Energy Assessment guidance.

- 21.54 Minor development proposals, including retrofit, should be designed to achieve a low overheating risk using the Good Homes Alliance Overheating Risk Assessment Method. More detailed modelling (e.g. as listed above) may be required for specific 'at risk' properties.

- 21.55 Development that will have a high likelihood of use with a vulnerable user group (elderly, ill, young) or where moving the user group will be difficult (holding facilities, schools, hospitals etc.) will be expected to achieve a higher standard to ensure occupants remain safe.

Policy CR4: Managing and Reducing flood risk

- A. Development must avoid and reduce all forms of flood risk, addressing residual risks and protecting people, buildings and infrastructure from current and future climate change impacts.
- B. Proposals will not be permitted that increase flood risk elsewhere, or that would result in an unacceptable standard of safety in the event of flooding.
- C. Proposals must be designed to be safe for a 1% annual exceedance probability (AEP) event with the appropriate allowance for climate change.

Locating development

- D. Proposals should be directed to areas in Haringey with the lowest flood risk in accordance with the sequential test in the National Planning Policy Framework (NPPF) and having regard to Haringey's Strategic Flood Risk Assessments (SFRA). If it is determined that the proposed development cannot be located in an area with a lower probability of flooding, the Council will apply the Exception Test in line with the NPPF.
- E. Having regard to the Flood Risk Vulnerability Classification in the NPPF, the following will not be permitted:
 - (1) Within Flood Zone 3b, uses classed as 'highly vulnerable', 'more vulnerable' or 'less vulnerable' and all basement development
 - (2) Within Flood Zone 3a, uses classed as 'highly vulnerable' and all basement development.
 - (3) In Flood Zone 2, self-contained basement dwellings and bedrooms.
- F. All development located in areas at risk of flooding must:
 - (1) preserve overland flood and flow routes, where applicable;
 - (2) ensure no net loss of on-site flood storage for both fluvial and surface water flood risk, or in exceptional circumstances provide off-site temporary storage;
 - (3) demonstrate that it will be safe throughout its lifetime without increasing flood risk elsewhere, taking into account the vulnerability of its users;
 - (4) avoid flood risk through site layout, design and through applying lower vulnerability uses to higher risk areas;
 - (5) maintain or provide new or upgraded flood infrastructure and/or provide a financial contribution towards wider measures which reduce and mitigate against flood risk, where appropriate;
 - (6) incorporate flood resilient and flood resistant design measures in accordance with current Environment Agency (EA) guidance and local standards,
 - (7) apply appropriate construction techniques to limit potential disturbance to natural groundwater flows;
 - (8) manage residual flood risks, including through:

- (9) providing property level protection for developments located in Flood Zones 3a and 3b; and
- (10) providing evacuation plans and flood warning arrangements, where appropriate.

Assessing Flood Risk

- G. Proposals must assess the risk of flooding from all sources in accordance with the Council's most recent SFRA.
- H. Site-specific Flood Risks Assessments (FRAs) will be required for major development where proposals are located within Flood Zone 2 or 3 (a and b) and for proposals located within Flood Zone 1 where:
 - (1) the site area is 1 hectare or more;
 - (2) the EA's flood mapping shows the proposed site will be at increased risk of flooding from rivers, seas or surface water flooding during the development's lifespan;
 - (3) Haringey's SFRA identifies the proposed site as being at increased risk of flooding during the development's lifespan;
 - (4) proposals are located within a Critical Drainage Area, having regard to policy CR5;
 - (5) proposals would increase the vulnerability classification; or
 - (6) proposals may be subject to sources of flooding other than river and sea flooding, including surface water, ground water and sewer flooding.
- I. Site-specific Flood Risk Assessments will be required for minor development and proposed changes of use if they:
 - (1) are located outside of Flood Zone 1;
 - (2) are located within a Critical Drainage Area, having regard to policy CR5;
 - (3) change the existing footprint of the building(s); or
 - (4) are at risk from any other sources of flooding.
- J. Groundwater Screening Assessments will be required for all major and minor development where there is a risk of groundwater flooding.

Supporting Text

21.56 Haringey's topography, geology, dense urban character and high coverage of non-absorbent or impermeable surfaces mean it has a comparatively high risk of surface water flooding than many other places. In addition, large parts of the east of the borough are susceptible to river (fluvial) flooding associated with the River Lee. Projections indicate that climate change will place a greater number of people, properties and infrastructure in the borough at risk of flooding.

Strategic flood risk management in Haringey

21.57 It is not possible to completely stop flooding, but steps can be taken to reduce flood risk in Haringey through designing new development to be more climate resilient and through Council-led strategic measures and maintenance programmes. Proposals

should ensure that they take opportunities to support and contribute positively to the Council's flood risk mitigation strategies wherever possible.

21.58 In its role as “Lead Local Flood Authority”, the Council has primary responsibility for managing flood risks from surface water, groundwater, and some culverted watercourses within Haringey. Following the intense rainfall in July 2021 and August 2022, the Council has significantly increased its investment into mitigating flood risk and regularly publishes Flood and Water Management Investment Plans setting out planned investment as well as future aspirations for delivery.

21.59 [Haringey's Local Flood Risk Management Strategy](#) provides further information on borough-wide strategic measures that the Council is implementing to manage flood risk and fulfil its LLFA duties. Haringey's Watercourse and Flood Risk Plan (2022) provides guidance on the role watercourses and flood prevention features in Haringey's parks and greenspaces can play in the delivery of the Local Flood Risk Management Strategy.

Climate change allowances

21.60 The UK climate change allowances are guidelines produced by the Environment Agency (EA) that are used to predict the potential future impacts of climate change on flood risk for new development. The predictions consider rising sea levels, increased rainfall and other environmental factors over a set period (for example, 50, 100, or 150 years).

21.61 Proposals should always apply the ‘upper-end’ of climate change scenarios when applying climate change allowances to assess fluvial and surface water flood risk in Haringey, having regard to the most recent [Environmental Agency guidance](#).

21.62 Proposals must be designed to be safe for a 1% annual exceedance probability (AEP) event including an ‘upper-end’ climate change allowance. This should be achieved without increasing flood risk elsewhere, with the condition that there is no net loss of flood storage and overland flow routes remain unobstructed. Consequently, self-contained residential basements and bedrooms at basement level will not be permitted in areas subject to fluvial and surface water flood risk.

Locating development

21.63 Haringey's Strategic Flood Risk Assessment Level 1 (SFRA 2022) is a key statutory evidence base document that informs the Local Plan, to ensure that minimising and mitigating flood risk is a key consideration when planning new development. The SFRA identifies locations in the borough that are at a higher risk of flooding and proposals must have regard to it when assessing flood risk. The Council will commission a SFRA Level 2 in support of the next iteration of this plan (Regulation 19) to provide a detailed assessment of all sources of flood risk for specified sites requiring targeted assessment.

21.64 Applying the sequential and exception tests is crucial in directing development to areas with lower flood risk, unless there is a robust justification for an alternative higher risk location. The NPPF and National Planning Policy Guidance set out when and how the Sequential and Exemption Tests should be applied.

21.65 The Council will apply the sequential test in accordance with the NPPF when determining appropriate locations for proposals and the exception test will apply where it is not possible to locate development in lower risk areas.

21.66 Proposals must provide sufficient evidence to enable the Council to assess whether the Sequential and Exception Tests have been applied correctly. Evidence should be up-to-date and based on the best data available

21.67 Pre-application engagement with the Council is encouraged to ensure that the Sequential Test has been applied correctly.

Flood risk vulnerability classifications

21.68 [Appendix 3 of the NPPF](#) sets out the full list of flood risk vulnerability classifications for development uses within four key categories:

- 1) essential infrastructure (e.g. essential utilities infrastructure);
- 2) highly vulnerable (e.g. basement dwellings, emergency services stations);
- 3) more vulnerable (e.g. hospitals, residential); and
- 4) less vulnerable (e.g. car parks, offices) and water-compatible development (e.g. docks, marinas and wharves).

21.69 Proposals should refer to the Haringey SFRA for further information regarding how vulnerability classifications should be applied to proposed uses.

21.70 Proposals should also be in accordance with the London Regional Flood Risk Appraisal (RFRA) (2018). The RFRA recommends that planning policies make the most of opportunities presented by regeneration and redevelopment located on river corridors to reduce fluvial flood risk through the location, layout and design of development. The report also recommends maximising opportunities for open space for flood water management. Proposals should have regard to the Environment Agency's [flood risk map for planning](#).

Development located in areas of flood risk

21.71 When applying measures to avoid, mitigate and manage flood risks, nature-based solutions should be fully explored and prioritised where possible. Proposals should clearly indicate on drawings where measures have been introduced, including showing where safe access and escape routes are located in the event of a flood.

21.72 Property level protection measures include:

- Sandbags

- Doors and windows: automatic flood-proof doors and windows or purpose-built flood boards that can be installed when flooding is expected
- Landscaping in gardens designed to divert floodwaters
- Waterproof sealant to exterior walls
- Flood-proof air bricks or covers for air bricks which can be installed when flooding is inspected
- Drains and pipes fitted with non-return valves
- Temporary flood barriers

Flood resilient and flood resistant design measures

21.73 Finished floor levels should be set at least 300mm above the 1% AEP (1 in 100 year) flood level, plus climate change allowance, in accordance with Haringey's SFRA. Flood resistant materials must also be applied up to at least 300mm above the estimated flood level. The [EA's standing advice](#) will apply to 'more vulnerable', 'less vulnerable' and 'water compatible' development located in Flood Zone 2.

21.74 Where there is a particularly high level of uncertainty regarding the estimated flood level, the requirement for finished floor levels and flood resistant materials may need to be increased. Applicants are encouraged to liaise with the Council at the preapplication stage where there is the case.

21.75 All permissible basement development should be fully fitted with flood resilience measures, including waterproofing floors and walls.

Ground water flood risk and basements

21.76 Development proposed in areas at risk of ground water flooding should apply appropriate construction techniques to limit potential disturbance to natural groundwater flows, having regard to Haringey's SFRA. For example, where basements or deep strip foundations are proposed, the use of additional drainage measures or piled foundations should be explored.

Site-specific flood risk assessments

21.77 Site-specific flood risk assessments (FRAs) should be prepared in accordance with national planning policy and guidance, the Council's SFRA, and EA advice. Applicants are encouraged to engage early with the Local Lead Flood Authority and the Environment Agency.

21.78 FRAs should:

- have regard to the Local Flood Risk Management Strategy;
- assess the flood risk from all sources and include the potential impact of climate change over the development's lifetime (using the 'upper end' climate change scenarios when implementing climate change allowances for surface water and fluvial flood risk);
- analyse and appropriately mitigate predicted depth and level for the design flood (presented in metres above Ordnance Datum);

- establish whether and how the development would increase flood risk to others;
- establish how the development would be made safe for its lifetime, including proposed measures and taking residual risk into account;
- provide evidence to support the application of the Sequential Test (if necessary);
- establish whether the development will be safe and pass the Exception Test, if applicable;
- be based on the best available evidence; and
- be appropriate for the scale, nature and location of the development.

21.79 The Council will publish a checklist for minor developments to assist applicants with preparing site-specific flood risk assessments where they are required.

Policy CR5: Sustainable Drainage

- A. To reduce the risk of flooding and control surface water run-off from development, proposals should:
 - (1) restrict surface water runoff rates to greenfield 1 in 100 year rates, including the appropriate allowance for climate change.
 - (2) manage surface water as close to its source as possible in accordance with the Sustainable Drainage hierarchy in Policy SI13 of the London Plan;
 - (3) prevent the loss of permeable surfaces/areas of soft landscaping;
 - (4) maximise the provision of integrated sustainable urban drainage systems (SuDS) in accordance with the Council's local standards and guidance.
- B. Where sustainable drainage systems (SuDS) are implemented they should:
 - (1) meet the requirements set out in the Council's local standards and guidance, or national standards where agreed; and
 - (2) be designed to maximise biodiversity, provide local amenity and recreational value and improve water quality;
 - (3) be sensitively incorporated within the site layout and design of new development; and
 - (4) Be easy to maintain and function effectively over the lifespan of the development.
- C. Where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations) robust justification must be provided along with proposed alternative sustainable approaches to surface water management.
- D. To demonstrate compliance with the Council's sustainable drainage requirements, Drainage Strategies incorporating a completed Haringey SuDS Proforma are required for all major developments and minor developments making significant changes to existing surface water drainage.
- E. Additional site-specific surface water flood risk assessments may be required for proposals located in Local Flood Risk Zones (LFRZ) identified within Critical Drainage Areas.

Supporting text

Surface water run-off

21.80 Haringey is at particular risk from surface water flooding. Surface water run-off is the excess water that flows off the land as a result of rainfall that is unable to filter through the soil. Surface water flooding occurs when high-intensity or prolonged rainfall generates run-off which flows over the surface of the ground and ponds in low lying areas. This can lead to flooding when the ground is saturated or when the drainage network has insufficient capacity to cope with the additional flow, and it also

contaminates water habitats and blue infrastructure as pollution is washed from road surfaces into nearby watercourses.

21.81 Proposals should be designed to reduce flows to a ‘greenfield’ run-off rate. A greenfield run-off rate is one that reflects the natural rate of water run-off from an undeveloped, naturally permeable site. The volume of run-off that must be stored on site should be calculated based on the nationally agreed return period value of a 1 in 100 year critical storm event, including an ‘upper-end’ allowance for climate change.

21.82 If robustly demonstrated that these requirements cannot be achieved, then run-off rates should be minimised as far as possible. The fact that a site is previously developed and has an existing high run-off rate will not constitute justification for non-compliance.

Local SuDS standards and guidance

21.83 Sustainable Urban Drainage Systems prioritise using natural processes and the landscape to reduce flood risk. They are designed to manage surface water run-off in urban areas in a way that mimics natural drainage processes.

21.84 In addition to their primary function of managing flood risk, SuDS should maximise the delivery of additional benefits through well-considered design, including:

- improving water quality;
- increasing biodiversity and supporting nature recovery
- providing rich amenity in the public realm;
- providing dynamic and attractive play space;
- enhancing local identity and sense of place; and
- contributing to urban cooling.

21.85 The Council has prepared local SuDS standards which will assist in the implementation of this policy. All SuDS should be designed having regard to Haringey’s SuDS standards and the GLA’s sector-specific SuDS guidance.

21.86 Applicants will be expected to demonstrate that SuDS will function effectively over the lifespan of the development, for example, by ensuring adequate arrangements for their management and maintenance.

21.87 SuDS may include and are not limited to:

- Green roofs
- Soft landscaping
- Permeable surfaces (e.g. permeable pavements, porous blocks)
- Rainwater harvesting systems
- Infiltration trenches and soakaways
- Tree pits
- Riparian buffer zones: Creating strips of vegetation along rivers and streams to absorb water, reduce surface runoff and improve water quality

- Incorporating ponds, basins and wetland features in the landscape to capture and hold excess rainwater, reducing the pressure on downstream areas during heavy rainfall (for example at Queen Elizabeth Olympic Park)
- Vegetative swales: Designing grassy channels along roads and pathways to slow and filter water, promoting infiltration rather than runoff
- Attenuation basins: Providing small basins in the landscape to hold water temporarily during peak flows before releasing it slowly

21.88 The appropriate SuDS measures to be employed will depend on site characteristics and the type of development proposed. Where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations), robust justification must be provided along with proposed alternative sustainable approaches to surface water management. Financial viability is not an acceptable justification for failure to comply with this policy.

Critical Drainage Areas and areas at ‘high risk’ of surface water flooding

21.89 Areas at high risk of surface water flooding in Haringey are identified in the Council’s Surface Water Management Plan (SWMP), Local Flood Risk Management Strategy (LFRMS) and SFRA.

21.90 Proposals located in areas of high flood risk must demonstrate that they have incorporated measures that will reduce the overall estimate level of flood risk in the area and may be subject to a greater degree of scrutiny.

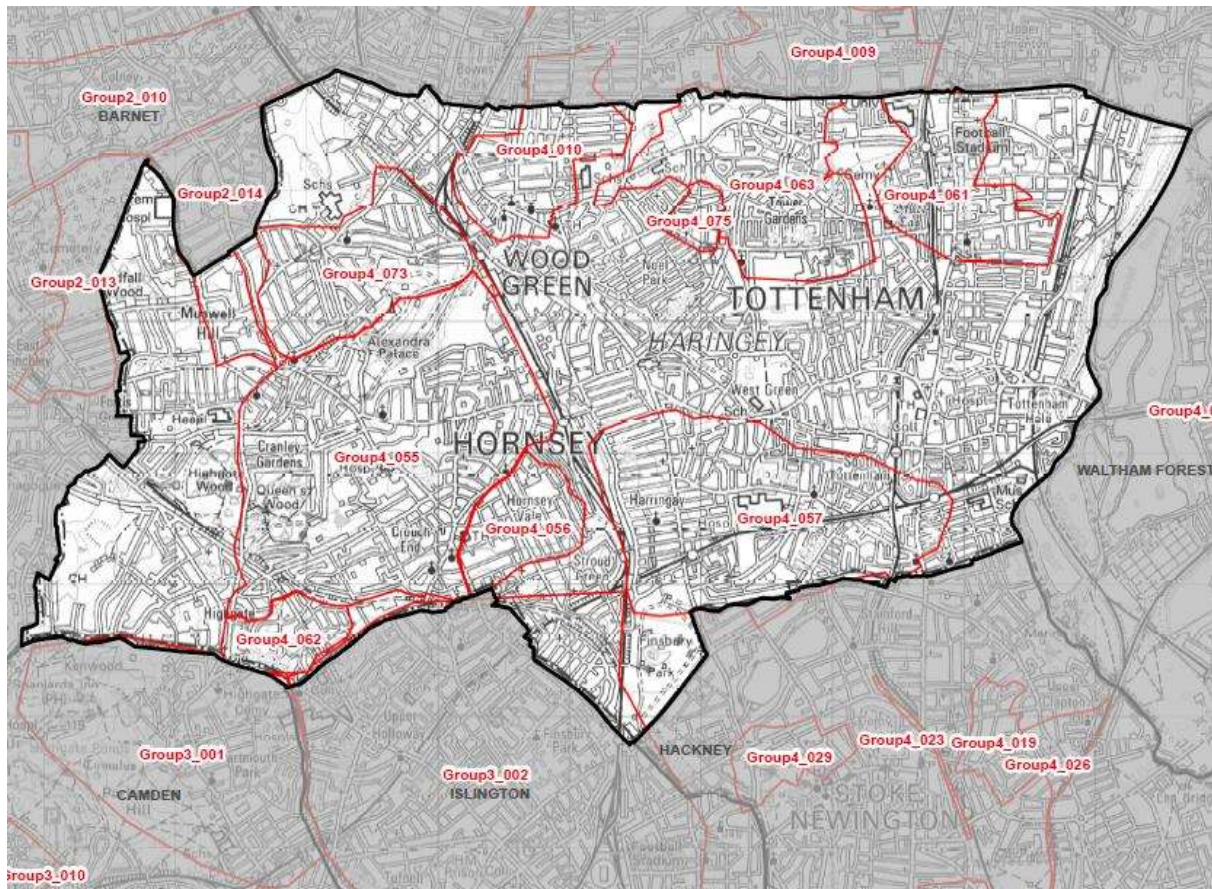
21.91 Haringey’s [Surface Water Management Plan \(SWMP\) \(2011\)](#) was undertaken as part of the Drain London Project and identifies areas in the borough that are at highest risk of surface water flooding. These are known as Critical Drainage Areas (CDA). Within these CDAs, Local Flood Risk Zones (LFRZ) are identified that represent the extent of predicted flooding in specific locations. The SWMP identifies 9 CDAs within Haringey. It is important that new development responds appropriately to managing flood risk in these locations.

21.92 Proposals for sites located within the LFRZ must include a planning statement addressing surface water flood risk. The Council may require a further site-specific Flood Risk Assessment to assess the risk of flooding, subject to site location and the extent of flood risk. Applicants are encouraged to liaise with the Council at the pre-application stage in order to help identify planning application requirements.

21.93 Haringey’s [Local Flood Risk Management Strategy \(LFRMS\) \(2019\)](#) identifies the ongoing work that the Council is undertaking to further define areas at risk of flooding, including mapping new areas of potential ‘high risk’ based on new data or experiences from recent storm events.

21.94 Proposals must also have regard to areas identified as being at ‘high risk’ of surface flooding in Haringey’s SFRA.

21.95 Applicants are encouraged to engage with the Council at an early stage to ensure that the latest information regarding site-specific flood risk is taken into consideration.



Map of Critical Drainage Areas (CDAs) in Haringey
(Image source: Haringey SWMP, 2011)

Policy CR6: Water Efficiency and Reducing the Risk of Drought

- A. The Council will require all development in Haringey to be water efficient during construction and operation. To achieve this, development proposals should:
- (1) Achieve the minimum London Plan requirements for mains water consumption.
 - (2) Set out what measures will be integrated that reduce the risk of drought and increase resilience of the site during drought periods.

Supporting text

- 21.96 London is an area of series water stress. During the July 2022 heat wave, high temperatures saw a 50% increase in water consumption and the Thames Water's reservoirs reduced to their lowest level in 30 years.
- 21.97 Proposals will be required to demonstrate how water use needs have reduced to a least achieve the minimum London Plan requirements for mains water consumption. A fittings-based approach should be used to determine the water consumption of a development. This approach is transparent and compatible with developers' procurement.
- 21.98 Proposals should clearly set out what measures have been implemented to minimise water use, this could include:
- Installing efficient fixtures and fittings (bath/shower, toilets, washing machine etc) with maximum capacity/flow rates;
 - Greywater harvesting; and
 - Rainwater harvesting for individual properties and any developments proposing external amenity and soft landscaping (see 'off-setting' below for further details on rainwater harvesting).

Policy CR7: Subsidence

- A. Development proposals should identify if they are located in areas that are at greater risk of subsidence.
- B. Where proposals are potentially at risk of subsidence, they must carry out a Land Stability Assessment, demonstrating that the risk will be mitigated.

Supporting text

21.99 Subsidence refers to the downward movement of the ground caused by the collapse or settling of the soil, rock or structural foundations. It can be triggered by a variety of factors, including soil shrinkage, water table fluctuations, tree roots, and construction activities.

21.100 Haringey is vulnerable to subsidence due to its clay rich soils, density of build form, tree roots and exposure to drought and heat. These issues will be exacerbated by the drier weather and higher temperatures brought by climate change. Development proposals should identify whether the land is potentially affected by land or slope stability, including subsidence.

21.101 Development should take measures to mitigate the risk of subsidence, including:

- Identifying whether the site may be affected by subsidence or slope stability. Soil investigation reports should be undertaken for new development.
- Ensuring good water management, including minimising and considering the effect of laying impermeable surfaces on the moisture content of the soil.
- Ensuring the foundation of new constructions and extensions, and underground infrastructure are designed to account for shrinkable clay soil conditions under present and future climate conditions.
- Implementing good tree management. Haringey has the second-highest rate of tree root claims in London, therefore it is essential that trees and their root systems are well-managed where they form part of new development. This includes considering the effect of planting large trees next to a building and considering the detrimental impact on soil moisture when removing existing mature trees. A sufficient root zone should always be provided for existing and new trees.
- Certain types of trees are particularly problematic with regards to subsidence risk and should be restricted in areas with clay-rich soils or unstable ground. Where possible, trees with less aggressive root systems should be prioritised in these areas, having regard to policy G6. Where this is not possible, root barriers should be installed to prevent water extraction near foundations.

Land Stability Assessment

- 21.102 Locations in Haringey with clay soils or unstable ground are at risk of subsidence. Preliminary desktop studies should be undertaken by a suitably qualified chartered professional using British Geological Survey (BGS) data to identify whether development sites are located in areas at risk of subsidence.
- 21.103 Preliminary desktop studies should:
- Assess geology, soil conditions, and historical land use
 - Identify shrink-swell clay soils, previous landfill sites, and groundwater fluctuations
- 21.104 Where development is proposed in an area identified as at risk of subsidence, proposals must submit a full Land Stability Assessment supported by site investigations, including:
- Geotechnical and Structural Surveys
 - Boreholes and soil testing to confirm ground stability
 - Groundwater monitoring to assess seasonal variations
 - Risk assessment for tree-related subsidence.
- 21.105 Land Stability Assessments and all associated site investigations must be carried out by a suitably qualified and chartered geotechnical engineer.
- 21.106 Proposed basement development must be taken into consideration as part of Land Stability Assessments as they can alter groundwater flow and increase the risk of subsidence if not properly managed. Basement proposals will not be permitted where they increase the risk of subsidence.

Policy CR8: Air Quality

- A. All new development must:
 - (1) prioritise the improvement of air quality, reduce public exposure to poor air quality and minimise inequalities in levels of exposure to air pollution;
 - (2) be air quality neutral ensuring that it does not create any new areas that exceed air quality limits or delay compliance in areas currently exceeding legal limits; and
 - (3) comply with applicable air quality standards and guidelines to safeguard public health and the environment.

- B. Air Quality Assessments must be submitted for the following types of proposal:
 - (1) Major developments.
 - (2) Minor developments that are likely to have an adverse impact on air quality or introduce new sensitive receptors to areas with existing poor air quality.
 - (3) Community infrastructure or other uses, including public open spaces, that are expected to be frequented by large numbers of particularly vulnerable groups such as older people and children.

- C. Proposals that fail to meet the requirements of Part A will be refused unless it can be suitably demonstrated that adverse impacts can be mitigated to an acceptable level.

- D. To reduce the impact on air quality during the construction and demolition phase development proposals must demonstrate how they plan to comply with the Non-Road Mobile Machinery Low Emission Zone and reduce emissions from the demolition and construction of buildings following best practice guidance.

Supporting text

- 21.107 Air pollution is the biggest environmental threat to health in the UK impacting everyone in our community. The Council has published a detailed Joint Strategic Needs Assessment on air pollution presenting local data, analysis and evidence on the issue. As of 2025, 8.2% of all deaths in Haringey are estimated to be attributable to air pollution, equivalent to ~100 deaths per year.
- 21.108 In Summer 2025 the Council published an Air Quality Action Plan 2025-2030 outlining its vision and commitment to improving air quality in Haringey. The plan sets out 22 measures which the Council and partners will do to improve air quality over the next five years including measures targeted at reducing emissions from developments and buildings. To track progress and meet its London Air Quality Management Duties the Council publishes an Air Quality Annual Status Report.

- 21.109 This plan seeks to prioritise the improvement of air quality and ensure new development is air quality neutral in line with the London Plan.
- 21.110 By prioritising air quality improvement, new developments can help mitigate the adverse effects of existing poor air quality, ultimately benefiting public health and the environment. By avoiding exceeding air quality limits the policy will ensure that new developments do not create additional areas that exceed air quality limits and will prevent the creation of new areas with poor air quality, and is a proactive approach to protecting public health and complying with legal air quality standards.
- 21.111 Requiring Air Quality Assessments (AQAs) for certain developments ensures that potential air quality impacts are thoroughly evaluated and addressed during the planning stage. AQAs help identify potential sources of air pollution, assess the magnitude of the impact, and propose suitable mitigation measures. The whole borough has been declared an Air Quality Management Area and so assessments are also necessary to determine whether the proposed developments will exacerbate existing poor air quality or introduce sensitive receptors to areas already experiencing air quality issues. This requirement aims to prevent further deterioration of air quality in these already vulnerable areas.
- 21.112 It is also important to assess the air quality impact of community infrastructure and spaces frequented by vulnerable groups as this is essential to safeguard their health and well-being. By evaluating the potential exposure of such groups to air pollution, appropriate mitigation measures can be implemented to protect their health.
- 21.113 Requiring proposals to meet the air quality improvement and assessment requirements ensures that developers take air quality considerations seriously. It sets a clear expectation that proposals not meeting these requirements will be refused, prioritising the protection of public health and compliance with air quality standards.
- 21.114 Where mitigation measures are required, these should be delivered on-site ensuring that the burden of addressing air quality impacts is placed on the development itself. This approach promotes sustainable development practices by integrating air quality measures into the design and operation of the development, rather than relying solely on off-site measures. Off-site provision will only be acceptable in exceptional circumstances with equivalent air quality benefits required to be delivered in the affected area ensuring that the air quality impact of the development is properly addressed. This provision offers flexibility while maintaining the overall objective of protecting and improving air quality.
- 21.115 The Mayor of London has produced comprehensive guidance on air quality. To assist those involved in designing and planning new development, London Plan Guidance (LPG) on Air Quality Neutral has been prepared. The Air Quality Neutral LPG sets air quality benchmarks for all development to ensure that their transport and building emissions do not worsen air quality in London. Air Quality Positive LPG aims

to maximise benefits to local air quality in and around a large-scale development sites and masterplan areas while also minimising exposure to existing sources of poor air quality.

22. Climate Emergency and Buildings

Introduction

- 22.01 The UK has a legally binding requirement to become 'net zero carbon' by 2050, which means reducing greenhouse gas emissions by at least 100% compared to 1990 levels, as set out in the Climate Change Act 2008.
- 22.02 Chapter 14 of the NPPF sets out national policy requirements for meeting the challenge of climate change. Paragraph 161 states that the planning system should support the transition to a low carbon future in a changing climate, "in line with the objectives and provisions of the Climate Change Act 2008".
- 22.03 Haringey has been at the forefront of climate change policymaking in London. We were one of the first London boroughs to declare a Climate Emergency in March 2019 and have committed to becoming a zero-carbon Council by 2029, and a zero-carbon borough by 2041. To help deliver these objectives we published a Climate Change Action Plan in 2021, which sets out the key actions required to reduce our council, housing, workplace, transport, energy, and community emissions. The New Local Plan is an important policy tool for realising our objectives, given around 40% of UK carbon emissions are linked to the built environment.
- 22.04 Our Draft Local Plan sets addressing the climate emergency at its heart, within our Placemaking Objective to achieve a 'Sustainable and Resilient Place, strong communities, a regenerating natural environment and on target to be net zero carbon by 2041'. It is a challenge that is tackled throughout all parts of the Local Plan. This section focuses on how we do this through the way we use and develop our buildings.

Policy CE1: Achieving a Zero Carbon Balance

- A. All development should achieve a **Zero Carbon Balance**. To deliver this, proposals must:
- (1) Minimise embodied carbon emissions in accordance with the **Embodied Carbon Hierarchy** set out in Policy CE2, which includes taking a ‘retrofit first approach’.
 - (2) Minimise waste by applying the **Circular Economy Principles** set out in Policy CE3.
 - (3) Achieve Net Zero Operational Carbon by following the **Operational Carbon Hierarchy**
 - a Be Lean - take a ‘passive design’ approach, prioritising building fabric improvements to deliver high levels of energy efficiency as required by Policy CE4
 - b Be Clean - use low & zero carbon infrastructure to heat, cool and power buildings as required by Policy CE5
 - c Be Green - maximise on-site renewable energy generation as required by Policy CE6
 - d Be Seen - measure, monitor and report the energy performance of proposals as they are planned, built-out and in-use as required by Policy CE7

22.05 This policy contributes to the Haringey Placemaking objectives as follows:

A SUSTAINABLE & RESILIENT PLACE

Place greater emphasis on achieve net zero operational carbon on-site, avoiding the costs of having to retrofit new buildings in the future

Introduce policies to minimise embodied carbon and support the circular economy

A HEALTHY & SAFE PLACE

Ensure people are comfortable inside buildings, particularly in the context of a changing climate

A FAIR PLACE

Address fuel poverty by delivering homes that require less energy

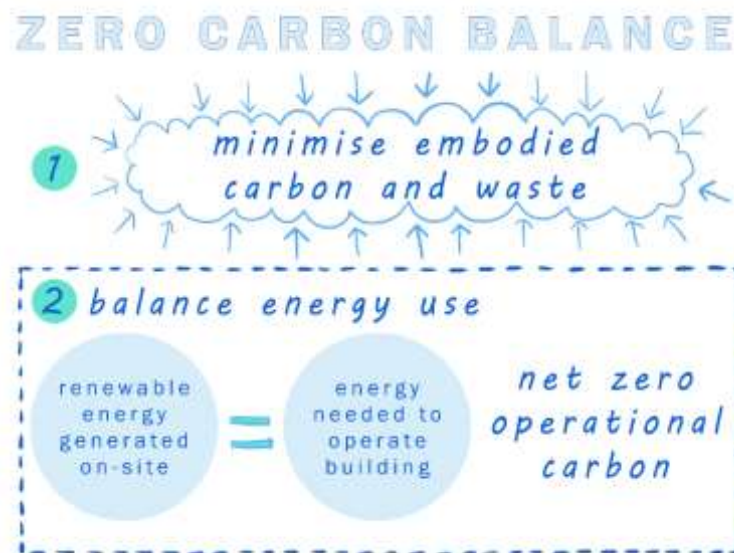
Require proposals to take opportunities to address social inequities

Supporting Text

Zero Carbon balance

22.06 Zero Carbon Balance is achieved through two key steps:

1. Minimising carbon emissions generated over the whole lifetime of a development, including the carbon generated by making, un-making and using the building ('whole life-cycle carbon emissions'). Designing out waste (also known as taking a 'Circular Economy approach') forms an important part of this process.
2. Prioritising an energy efficient building fabric ('Be Lean') with a low carbon heat source ('Be Clean') and meet the residual energy demand needed to operate the building entirely through on site renewable energy ('Be Green')

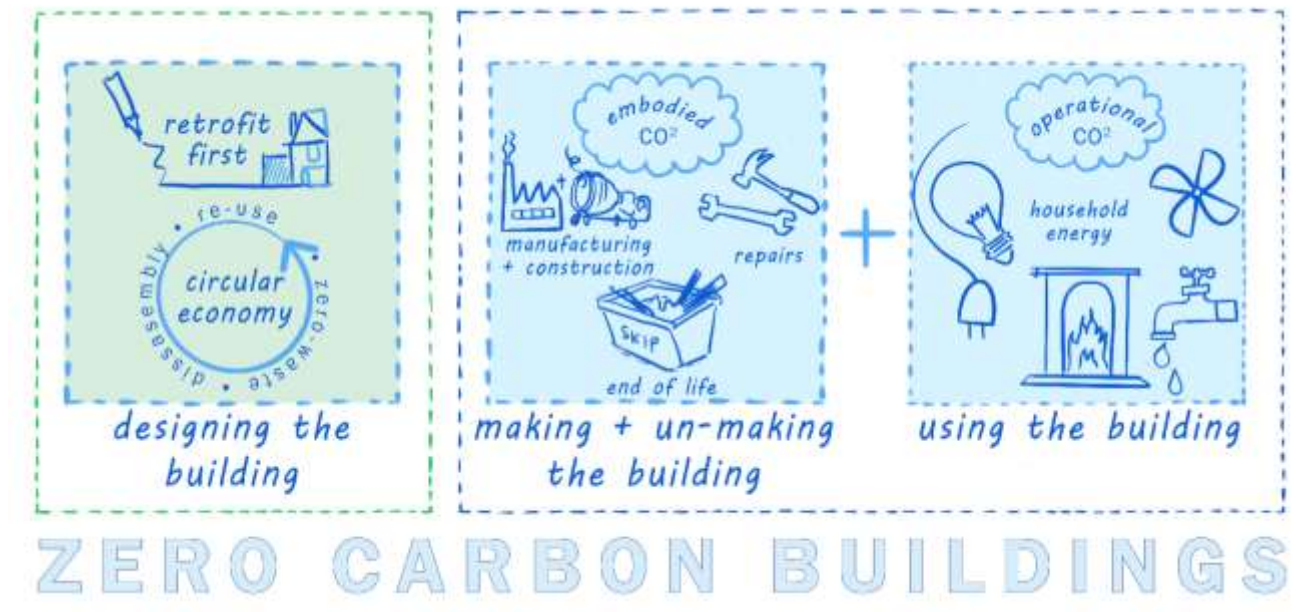


22.07 It is not possible to make even ultra-low energy buildings comfortable all-year round without some space heating during colder months, and buildings have other operational needs that require an energy input, for example electricity for lighting or cooking food. The energy needed to operate the building is referred to as the 'energy demand'.

22.08 By making the building fabric as energy efficient as possible the remaining energy demand can be reduced sufficiently such that the demand can be met entirely by power generated from renewable energy sources 'on site' (such as solar photovoltaic panels or PVs). If a building can meet its energy demand entirely through on-site renewable energy sources it has achieved Net Zero Operational Carbon.

22.09 Offsetting emissions is discouraged and should only be used in exceptional cases where it is demonstrated that it is not technically feasible to achieve Net Zero Operational Carbon.

22.10 Development that achieves a Zero Carbon Balance has therefore taken every opportunity to minimise carbon emissions and optimise energy efficiency.



Minimising Embodied Carbon

22.11 **Embodied Carbon** refers to carbon emissions associated with the making and unmaking of buildings. This includes their manufacture and construction ('upfront embodied carbon'), repair and maintenance ('in-use') and deconstruction, waste processing and disposal ('end-of-life').

22.12 We need to reduce emissions as quickly as possible to avoid global climate tipping points being reached, and minimising upfront embodied carbon will play an increasingly important role in this in the coming years. This is why we are taking a **Retrofit First Approach** requiring applicants to investigate retrofit opportunities as part of their design process and to, where appropriate, avoid carbon emissions by improving existing buildings rather than demolishing and building new, while still making best use of the land.

22.13 Our policies require proposals to minimise embodied carbon emissions and meet maximum embodied carbon targets.

Minimising Waste

22.14 Linked to the concept of minimising embodied carbon is the 'Circular Economy'. A **Circular Economy** is one where materials are retained in use at their highest value for as long as possible and are then re-used or recycled, leaving a minimum of residual waste. Reducing waste means less carbon is wasted, for example through emissions generated by manufacturing and transporting materials or through disposing of

waste. Applicants should apply a circular economy approach right from the start of the design process. This includes taking a retrofit first approach, but also thinking strategically about the future use of materials in an intelligent way – for example sizing elements to minimise wasted offcuts of sheet material, or through designing fixings and joints that can be easily disassembled in the future so that materials can be reused (e.g. nuts and bolts rather than welding or adhesives). This ensures that the components of the building can have as long a life as possible and makes them more useful as a material resource at the end of the building's life.

Net Zero Operational Carbon

22.15 **Operational Carbon** refers to carbon emissions produced when a building is in use, for example heating, cooling, or lighting. **Net Zero Operational Carbon** is achieved where a development balances its operational energy use with on-site renewable energy generation (for example solar panels) or investment in additional off-site renewable energy (without offsetting).

22.16

22.17 The capacity for developments to achieve Net Operational Carbon is well established and is a requirement in the London Plan 2021. Our policies expect all development in Haringey to achieve Net Zero Operational Carbon through our Operational Energy Hierarchy. Proposals are also expected to align with the London Plan's 'Be Seen' requirement by measuring, monitoring and reporting on their Net Zero Operational Carbon targets.

22.18 This builds on the framework of the London Plan energy hierarchy, while introducing a new, more effective way of assessing energy efficiency and higher standards for reducing energy and emissions on-site. We see these locally specific policies as necessary to meet our climate ambitions, reducing emissions as quickly as possible and avoiding having to retrofit new buildings at a later date.

Implementation

22.19 Energy Statements are required where proposals meet relevant criteria. They should contain a written summary of the overarching strategy for achieving a Zero Carbon Balance in accordance with our policies. They should be proportionate to the scale of development and supported by the relevant documentation as required by policies CE2 to CE7.

Policy CE2: Embodied Carbon and Retrofit

- A. All development must be designed to maximise Whole Life Cycle carbon savings by minimising embodied carbon in the following order of priority:

Embodied Carbon Hierarchy

- (1) **Build less** – take a ‘retrofit-first’ approach, exploring retrofit and repair opportunities from the outset of the design process and prioritising the reuse and retrofit of existing buildings, where appropriate, as well as maximising the re-use of existing materials on site.
 - (2) **Build light** – design building structures and services to be resource-efficient and lightweight where appropriate, minimising material waste.
 - (3) **Build low-carbon** – minimise the environmental impact of materials by specifying low-carbon building products.
- B. Proposals will be supported where they successfully demonstrate that embodied carbon will be reduced as far as possible, through a Whole Life Cycle Carbon Assessment (WLCA).
- C. As a minimum requirement, major development must limit total embodied carbon to the following targets:

Upfront and Embodied Carbon targets (all values in kgCO ₂ e/m ² , GIA) ³ (including sequestration)			
Type of development	Until 2028: ⁱⁱ (25% reduction over baseline) ('C' rating)	Until 2031: ⁱⁱⁱ (40% reduction over baseline) ('B' rating)	2031 onwards: (65% reduction over baseline) ('A' rating)
Residential	Upfront Carbon: <500 Embodied Carbon: <800	Upfront Carbon: <400 Embodied Carbon: <625	Upfront Carbon: <300 Embodied Carbon: <450
Office	Upfront Carbon: <600 Embodied Carbon: <970	Upfront Carbon: <475 Embodied Carbon: <750	Upfront Carbon: <350 Embodied Carbon: <530
Education	Upfront Carbon: <500 Embodied Carbon: <675	Upfront Carbon: <400 Embodied Carbon: <540	Upfront Carbon: <300 Embodied Carbon: <400)
Retail	Upfront Carbon: <550 Embodied Carbon: <690	Upfront Carbon: <425 Embodied Carbon: <535)	Upfront Carbon: <300 Embodied Carbon: <380 (
All other non-residential buildings	Upfront Carbon: <600 Embodied Carbon: <970	Upfront Carbon: <475 Embodied Carbon: <750	Upfront Carbon: <350 Embodied Carbon: <530

D. Proposals for development on sites with existing buildings must take a 'retrofit first' approach, evidencing that reuse, repair and retrofit design options have been considered from the earliest design stage and demonstrating that the reuse and retrofit of existing buildings has been prioritised having regard to the Haringey Placemaking Framework, relevant site allocations, and the need to make best use of land.

E. The Council will support appropriate retrofitting of existing buildings to reduce energy demand and overheating risk.

Supporting text

Embodied carbon

22.20 Embodied Carbon refers to carbon emissions associated with the making and unmaking of buildings. This includes their manufacture and construction ('upfront embodied carbon'), repair and maintenance ('in-use') and deconstruction, waste processing and disposal ('end-of-life').

22.21 As developments are being designed to be more energy efficient, embodied carbon is representing an increasingly larger proportion of the total emissions associated with

³ Letter rating from LETI 'Embodied Carbon Target Alignment' (2021) - standardised performance benchmarks produced in collaboration with RIBA, the GLA, the Institute of Structural Engineers, the Whole Life Carbon Network and UKGBC.

new development. It is therefore increasingly important for developments to maximise opportunities to reduce embodied carbon.

22.22 Proposals should reduce embodied carbon in building materials by all means available. Typically, the biggest opportunities to reduce the carbon content of building materials are as follows:

- i. sourcing materials locally;
- ii. re-using existing materials;
- iii. using bio-based materials;
- iv. using recycled materials; and
- v. sustainably sourced materials.

22.23 Each development and each building element will present different opportunities to achieve the greatest reductions in embodied carbon. For example, in one project the primary building structure may represent the biggest opportunity for savings, while in another it could be the building services and ductwork.

22.24 For further guidance regarding low carbon materials, applicants should refer to [LETI's Embodied Carbon Primer](#).

Whole Life Cycle Carbon Assessments

22.25 All development resulting in the creation of 30 or more dwellings or 1,000sqm or more non-residential GIA will be required to undertake a Whole Life Carbon Assessment (WLCA) in line with the [GLA's guidance](#), and to demonstrate that whole life carbon savings have been maximised.

22.26 All development proposing to demolish and rebuild a single dwelling will be required to undertake a Whole Life Carbon Assessment in line with Haringey's Whole Life Carbon Assessment Guidance.

22.27 Any development which is not proposing to demolish and rebuild can still provide a WLCA and is encouraged to consider embodied carbon early in the design process.

22.28 Applicants should also refer to the detailed practical guidance produced by the Royal Institute of Chartered Surveyors (RICS): ['Whole Life Carbon Assessment for the built environment'](#).

Retrofit First

22.29 Around 80% of our buildings are expected to still exist in 2050. To meet our borough-wide target of net zero carbon by 2041, most of Haringey's buildings need to be retrofitted to improve their energy efficiency. Retrofitting also provides other benefits including improving health outcomes by avoiding cold, damp and mouldy homes, addressing fuel poverty by reducing energy demands and making our buildings resilient to the extreme weather events that a changing climate brings.

- 22.30 Paragraph 167 of the NPPF states that in determining planning applications, “local planning authorities should give significant weight to the need to support energy efficiency and low carbon heating improvements to existing buildings, both domestic and non-domestic (including through installation of heat pumps and solar panels where these do not already benefit from permitted development rights).” It further explains that where proposals would affect conservation areas, listed buildings or other relevant designated heritage assets, local planning authorities should also apply the policies set out in conserving the historic environment chapter of the framework.
- 22.31 Although not all retrofit proposals require planning permission, our policies seek to support appropriate retrofitting where planning permission is required. Where proposals include the full or partial demolition of existing buildings, and their replacement with new buildings, they must evidence that this is justified and that re-use and retrofit design options were fully considered prior to the design of new buildings. Proposals that fail to demonstrate adequate consideration for the retention and retrofit of existing buildings will be resisted. Justifications should reference the Placemaking Framework, any relevant site allocations, and the need to make best use of the land.
- 22.32 Where energy efficiency retrofit improvements to the building fabric are proposed, applicants should take a whole building approach. This means having a co-ordinated approach to how the building fabric is upgraded, whether that is a home, a series of connected homes in a terrace, or a block of flats. This is important because taking retrofit steps in isolation may have unintended negative consequences. For example, installing wall insulation which is not breathable can cause mould problems in some older buildings, and only installing insulation in one part of the building but not another may also result in damp patches (this is often referred to as ‘thermal bridging’). Some proposals may need to take a phased approach to completing retrofit works. For those cases, the proposed phasing of the works should be explained as part of a Retrofit Method Statement, demonstrating how this has been planned to follow a whole building approach and ensure the building remains healthy and fit for purpose throughout its use.
- 22.33 It is noted that there may sometimes be a need for a phased approach to retrofit works. Where this is the case, the approach should be set out in a Whole Building Retrofit Plan.

Embodied carbon targets

- 22.34 This policy introduces phased embodied carbon targets for major developments. The ‘C’ rating targets (up to 2028) are based on current best practice. The targets are informed by industry-led evidence produced by the London Energy Transformation Initiative (LETI) in partnership with the Whole Life Carbon Network (WLCN) and the Institution of Structural Engineers (IStructE), and in consultation with the Chartered Institution of Building Services Engineers (CIBSE), Royal Institute of British Architects (RIBA) and the GLA. The targets increase over the plan period to account for expected improvements in best practice, firstly to a ‘B’ rating in 2028 (considered to be a robust

stretch target at the current time), and then to an 'A' rating in 2031 (considered to be the longer-term design standard).

- 22.35 Further evidence work is being undertaken to support the embodied carbon targets and ensure they provide an aligned methodology and consistent measures for the development industry. Policies will be adjusted through the plan-making process in response to this work as required.

Implementation

- 22.36 Major development proposals should summarise how they have minimised embodied carbon and met the relevant targets within an Energy Statement, with detail provided in an appended Whole Life Carbon Assessment. This should calculate carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment, such as RICS Whole Life Carbon Assessment or equivalent, and demonstrate actions taken to maximise whole life-cycle carbon savings. Minor development proposals should summarise in their Energy Statement how they have minimised embodied carbon.

Policy CE3: Supporting the Circular Economy

- A. Proposals must be designed and delivered in accordance with the Circular Economy Principles and will be supported where they are demonstrated to do this

Circular Economy Principles

- (1) building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary
 - (2) designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build, and reuse of secondary products and materials
 - (3) designing for longevity
 - (4) designing for adaptability or flexibility
 - (5) designing for disassembly
 - (6) using systems, elements or materials that can be reused and recycled
- B. Major development proposals must meet or exceed the following targets for reducing material waste:
- (1) Construction and demolition waste – 95 per cent reuse/recycle/recovery
 - (2) Excavation – 95 per cent beneficial use. All inert excavation should be used for beneficial uses.
- C. Major development proposals should that use Building Information Monitoring to embed circular economy principles at an early stage.

Supporting text

Supporting the Circular Economy

- 22.37 Almost half of London's waste comes from construction and demolition activities^{iv}. Alongside reducing emissions, taking a Circular Economy Approach helps to address other global problems, such as resource scarcity and environmental degradation. It also provides an opportunity to create a more efficient economy with more green economy local jobs in fields like recycling and repairs.
- 22.38 This policy embeds Circular Economy Principles helping ensure proposals are designed for durability and flexibility, as well as for easy disassembly and reuse of building components to minimise waste during the 'in-use, 'maintenance/refurbishment' and 'end of life' phases of development.

Beneficial use of excavated material

- 22.39 Beneficial use of excavated material could include its use within the development, as part of habitat creation or land restoration. Proposals should seek to reuse materials on-site or within local projects.

BIM and building material passports

- 22.40 The UK Government promotes the use of Building Information Modelling (BIM) across public sector construction projects to support better information management, maintenance and performance over a building's whole lifespan (with BIM level 2 required as a minimum). BIM enables more efficient design, construction, and operation processes, which support circular economy principles such as resource efficiency, material reuse, and lifecycle planning. Major development proposals should use BIM to help deliver circular economy objectives.
- 22.41 Building material passports are digital records that provide detailed information about the composition, origin, and lifecycle potential of construction materials. They support circular economy objectives by enabling reuse, recycling, and responsible sourcing throughout a building's life and at end-of-life. BIM can facilitate the creation and management of material passports by cataloguing all of the materials used in a building during design and construction and maintaining these records throughout the asset's lifecycle. This integration helps ensure transparency, traceability, and informed decision-making for reuse and disassembly.

Implementation

- 22.42 Adherence to the Circular Economy Principles should be set out in the Energy Statement. For major development this should be set out in full in an appended Circular Economy Statement. The Circular Economy Statement should be prepared in line with the GLA's Circular Economy Statement Guidance.
- 22.43 Adherence to the targets for major development proposals should be demonstrated in the Circular Economy Statement and referenced in the Whole Life Carbon Assessment (as required).

Policy CE4: Energy Efficiency

- A. Proposals which take a passive design approach and deliver high levels of energy efficiency will be supported.
- B. New buildings must comply with the energy targets set out below as appropriate:

Type of Development	Space Heating Demand (SHD) (maximum permitted) ^v	Energy Use Intensity (EUI) (maximum permitted) ^v
NEW RESIDENTIAL		
New residential buildings	<15 kWh/m ² /yr	35 kWh/m ² /yr
NEW NON-RESIDENTIAL (1000sqm GIA and above)		
Schools	<15 kWh/m ² /yr	65 kWh/m ² /yr
Offices, retail, Higher Education teaching facilities, GP surgeries	<15 kWh/m ² /yr	70 kWh/m ² /yr
Hotels	<15 kWh/m ² /yr	160 kWh/m ² /yr
Student/keyworker accommodation and care homes / Warehouses and industrial buildings / Other non-residential buildings	<15 kWh/m ² /yr	35 kWh/m ² /yr

- C. Major development proposals for partially or fully retained residential buildings or buildings being converted to residential use will be supported where they meet the minimum targets below.

PARTIALLY⁴ OR FULLY RETAINED RESIDENTIAL BUILDINGS (RETROFIT)¹		
Energy Demand Policy target	Minimum target	Exemplar
Space Heating Demand (SHD)	<50 kWh/m ² /yr	<40 kWh/m ² /yr
Energy Use Intensity (EUI)	<50 kWh/m ² /yr	<25 kWh/m ² /yr/

- D. Where the nature of an existing building permits an ultra-low energy retrofit approach then applicants should seek to meet the exemplar policy target.
- E. Highly constrained retrofit of partially or fully retained existing buildings may comply with the standards above with an additional Energy Use Intensity

⁴ Where developments are part new build and part retention and refurbishment the relevant standards for each category of development will apply to the respective parts.

allowance of 10 kWh/m²/year, where it is clearly demonstrated that constraints prevent the minimum target from being met.

- F. Proposals are encouraged which improve the energy performance of buildings which are, or are within, designated and non-designated heritage assets. These should have appropriate regard to the heritage asset's significance including any contribution made by their setting.

Supporting text

Operational Carbon Hierarchy – 'Be Lean'

- 22.44 This policy embeds the first part of the Operational Carbon Hierarchy – 'Be Lean' – which requires that proposals are based on a 'passive design' approach, prioritising building fabric improvements to deliver high levels of energy efficiency. Sometimes referred to as a "fabric first" approach, passive design prioritises a high-quality, energy-efficient building fabric, which promotes comfortable and healthy indoor conditions while protecting buildings from weather conditions and other climate change-related impacts. Under our Operational Carbon Hierarchy, it is important that we first seek to minimise energy demand by designing our buildings to be energy efficient, before considering how we heat and power our homes.
- 22.45 Taking a 'passive design approach' means following the same methodology as the Passivhaus Standard, an internationally recognised standard in energy efficient building design developed by the Passivhaus Institute in Germany. Homes built to this standard reduce the requirement for space heating and cooling by up to 75% compared to standard practice for UK new-build development, whilst also creating excellent indoor comfort levels.
- 22.46 Basic design decisions such as massing, orientation and window size are fundamental to achieving the required levels of energy efficiency. Unlike other energy standards, therefore, passive design principles must be embedded from the earliest stages of the design process.
- 22.47 Taking a 'passive design approach' also aligns with the first step of the Mayor's Energy Hierarchy which requires proposals to prioritise reducing energy demand by improving the energy-efficiency of the building fabric (Be Lean).
- 22.48 **Airtightness** is an essential element of passive, low energy building design. It is achieved by designing out uncontrolled ventilation (commonly referred to as 'draughts'), by sealing the external envelope of the building. Airtight buildings still have opening windows – it simply means that unplanned air leakage is avoided, keeping building occupants comfortable and saving on energy bills through efficient design.
- 22.49 To make airtightness as cost effective and easy to implement as possible, designers should plan a strategy and prepare a method statement, including marked up plans

and consideration of appropriate phasing for sealing and testing the building during construction. Proposals should allow for a preliminary air tightness test at an appropriate moment in the construction programme, to avoid abortive work stripping back to the airtightness layer if the test is left until completion.

Energy targets

- 22.50 In 2023, on behalf of 18 partner London boroughs, Haringey led and managed the delivery of a ‘Delivering Net Zero Carbon’ evidence study which tested which planning policy targets could best support the delivery of Net Zero Carbon new buildings. The study was informed by extensive energy modelling and found that the most effective way to deliver Net Zero Carbon buildings is to set policy requirements for Space Heating Demand (the amount of heat energy needed to heat a building over a year (per sqm)) and Energy Use Intensity (the amount of total energy needed to run a building over a year (per sqm)), aligning with the Passivhaus Standard.
- 22.51 By meeting these targets, proposals will make the most of the carbon savings available through energy efficiency improvements and will support the delivery of more energy efficient buildings, avoiding the ‘performance gap’. An additional benefit of introducing these metrics is that they are easier to measure and monitor as the predicted energy use of the building is expressed in kilowatt hours and can therefore be easily compared against household energy bills. Taking this approach means that we can deliver the Be Lean and Be Seen objectives in the London Plan more effectively and align with the recommendations of the Climate Change Committee.
- 22.52 Separate energy efficiency targets for Space Heating Demand and Energy Use Intensity have been set for residential retrofit. These targets are not as high as the new build targets given the technical challenges associated with retrofitting and in recognition of the need to encourage a retrofit approach and focus on reducing upfront embodied carbon. Residential retrofit proposals are encouraged to achieve the Association for Environment Conscious Building (AECB) Retrofit Standard or equivalent.
- 22.53 Major developments for non-residential uses are expected to achieve a BREEAM standard of ‘Excellent’, or an equivalent, industry-recognised, assured performance standard.

Energy improvements to heritage assets

- 22.54 Adapting heritage assets to the impacts of our changing climate will safeguard their continued use, protect building occupant health and promote the Circular Economy principle of building for the long-term. Proposals for energy improvements to heritage assets should take a sensitive and holistic approach to the design and specification of the retrofit. This will help to reduce impacts on the significance of the asset by inappropriate interventions. Works should always be undertaken based on an understanding of the building’s historic evolution and construction (where these

matters relate to the heritage significance of the asset), architectural and historic significance, and demonstration of the building's environmental performance.

22.55 Historic buildings require a whole-building approach, often involving the specification of natural building materials to allow for moisture movement in traditional buildings and prevent damp. All proposals for energy improvements to heritage assets must have regard to Historic England's guidance for Retrofit and Energy Efficiency in Historic Buildings (2018). Proposals to modify existing historic windows should have regard to Historic England's technical guidance on Modifying Historic Windows as Part of Retrofitting Energy-Saving Measures.

22.56 Proposals for energy improvements to heritage assets which seek to undo the damage caused by previous inappropriate interventions will be supported.

Implementation

22.57 Adherence to a passive design approach should be set out in the Energy Statement.

22.58 Where energy targets apply to a proposal, the Energy Statement should set out Energy Use Calculations derived from a Passive House Planning Package or equivalent

Policy CE5: Low and Zero Carbon Heating Infrastructure

- A. Proposals which minimise carbon emissions associated with heating buildings will be supported.
- B. Having regard to the proposed solutions available for the site, proposals must prioritise low carbon heating measures in accordance with the Low Carbon Heat Hierarchy, which sets a hierarchy of highest priority measures (1) to lowest priority measures (5),

Haringey Low Carbon Heat Hierarchy

- (1) High grade waste heat (e.g. from Energy Recovery Facilities (ERF) including Decentralised Energy Networks (DENs) or supplied by energy industry)
- (2) Secondary waste heat (e.g. from underground ventilation shafts, data centres, swimming pools, leisure centres, etc)
- (3) Ambient heat - This should be prioritised in the following order of efficiency: Water Source Heat Pumps (WSHP), Ground Source Heat Pumps (GSHP) and Air Source Heat Pumps (AHSP), solar thermal (with or without heat pump)
- (4) Gas-fired CHP – This will only be supported in strategic energy centres where there is a clear long-term plan for decarbonising the network
- (5) Larger communal boilers – These will only be supported in strategic energy centres or as an interim solution until connection to a Decentralised Energy Network (DEN) becomes available
- C. Individual gas boilers will not be permitted in new development in Haringey.
- D. Ultra-low NOx communal gas boilers will only be permitted as an interim heating solution for developments that are due to connect to a nearby DEN.
- E. Proposals which prioritise and contribute to the provision and use of district heating and cooling networks will be supported.
- F. All major development located within 500 metres of a DEN ‘connection zone’ should be designed for connection to a DEN.
- G. All minor new-build development located within 25 metres of a DEN ‘connection zone’ should be designed for connection to a DEN.
- H. Available heat loads on adjacent sites should be used where viable.

- I. Development which includes significant sources of waste heat should investigate opportunities to export the heat to neighbouring sites via a DEN and will be expected to implement viable options. Applicants should engage with the Council and local energy service providers to inform decision making.
- J. Developments with large communal energy centres should review opportunities to expand capacity and supply energy to neighbouring existing and future planned developments beyond the site boundary. Applicants should engage with the Council and local energy service providers to inform decision making.
- K. Where site-wide communal and district heating systems are operational, the Council will require heat and energy service providers to enter into customer charters with domestic and micro-business customers, ahead of central government introducing regulation to protect customers on heat networks.
- L. Use of resistive electric heating including storage heaters will not be permitted as the main heat source for dwellings.
- M. New and additional low carbon heating sources will be resisted where there is an existing alternative low carbon heat source which could provide the necessary heat demands to the building occupant.
- N. Proposals for Air Source Heat Pumps should be appropriately sized and located, taking into account measures to minimise heating and cooling demand and local environmental impacts.

Supporting text

Operational Carbon Hierarchy – ‘Be Clean’

- 22.59 This policy embeds the second part of the Operational Carbon Hierarchy – ‘Be Clean’. Once demand for energy has been minimised, all planning applications must demonstrate how they will use local zero and low carbon energy resources to supply energy efficiently and cleanly. Development proposals must prioritise zero and low carbon heating measures in accordance with Haringey’s Low Carbon Heat Hierarchy. The Council will not support the use of fossil fuels for heating, except in the exceptional or interim circumstances outlined in the hierarchy.
- 22.60 Decentralised energy is supported by both national and regional policy as a means of achieving net zero carbon emissions by 2050. Heat network zoning is a key national policy, considered to form a crucial part of how the UK will reach its net-zero targets as a cost-effective way to decarbonise heating at a fair price to consumers. District Energy Networks (DENs) are uniquely able to unlock larger scale renewable and

recovered heat sources such as waste heat from industry, heat from rivers and from transport infrastructure.

- 22.61 The London Plan states that developments should connect to existing heat networks wherever feasible. The Mayor has identified Heat Network Priority Areas, which can be found on the London Plan Heat Map website. Almost all of Haringey falls within the Mayor's Heat Network Priority Area and the Council is supporting the roll out of heat networks in the borough.

- 22.62 There is considerable opportunity for Haringey to generate its own energy, reducing the borough's reliance on the national grid which is yet to decarbonise. Over half of the overall opportunity for decentralised energy in London is in medium and large-scale heat networks

- 22.63 For both new-build and retrofit scenarios, fabric efficiency measures should be prioritised first so that heat pumps can run efficiently, including where they are retrofitted into existing wet heating systems. Heat pumps do not run efficiently in poorly insulated buildings, resulting in expensive heating bills.

- 22.64 Evidence should be provided that the system output is sufficient for the demand. This will minimise the environmental impact of proposals by reducing peak demand and the electricity required to run the heat pumps, thereby lowering the running costs, reducing electricity demand and minimising pressure on the local power grid, as well as minimising carbon emissions. Improving the thermal performance of the building fabric will also help to mitigate visual, ambient and noise impacts on adjacent sites caused by oversized heat pump systems.

- 22.65 Individual Air Source Heat Pumps should meet MCS EN12831 standards or equivalent.

- 22.66 Where a significant cooling load is present, the heat hierarchy may be adjusted where developers can show an overall net benefit from combining heating and cooling systems (e.g. via absorption chillers, variable refrigerant flow (VRF), ambient loop, etc.).

Implementation

- 22.67 Adherence to the Haringey Low Carbon Heat Hierarchy and the minimisation of related carbon emissions should be set out in the Energy Statement.

- 22.68 Evidence of the designing in of potential DEN connectivity should be set out in the Energy Statement.

Policy CE6: Renewable Energy: On site, Off-site and Offsetting

- A. In meeting energy needs for operating buildings, proposals should maximise the use of on-site renewable energy including by producing, storing and using renewable energy on-site.
- B. Proposals which meet and/or exceed the Energy Use Intensity of the development with on-site renewable energy generation to achieve net zero operational carbon will be supported.
- C. For new buildings, the minimum amount of renewable energy generated in a year should be:
 - a. at least 80 kWh/m²(building footprint) per annum⁵ for all building types;
 - b. at least 120 kWh/m²(building footprint) per annum for industrial buildings;
- D. In exceptional circumstances, where , renewable energy generation has been maximised, and it is clearly demonstrated that the Energy Use Intensity of the development cannot be fully balanced by renewable energy generated on site, proposals should offset the shortfall by:
 - (1) delivering an off-site reduction in emissions within the borough. In this case, a proposal must be identified where delivery is certain and subject to agreement with the Council; or (only if this is not feasible or viable)
 - (2) through a cash-in-lieu contribution to Haringey's Energy Offset Fund.
- E. Proposals that have a significant negative impact on existing renewable energy installations on adjacent sites (e.g. solar, wind) will be resisted.
- F. Proposals for community renewable energy projects will be supported.
- G. Solar panels will be supported in Conservation Areas except where there is guidance in an adopted Conservation Area Appraisal and Management Plan to indicate that this would be inappropriate or the proposal is otherwise inappropriate having regard to the special character and appearance of the conservation area.

Supporting text

Operational Carbon Hierarchy – ‘Be Green’

- 22.69 This policy embeds the third part of the Operational Carbon Hierarchy – ‘Be Green’. Once demand for energy has been minimised, all planning applications must demonstrate how they will use local zero and low carbon energy resources to supply

⁵ measured in per square meter of building footprint

energy efficiently and cleanly. Achieving a zero carbon balance requires the residual energy demand needed to operate a building to be met entirely through on site renewable energy ('Be Green')

- 22.70 It is not possible to make even ultra-low energy buildings comfortable all-year round without some space heating during colder months, and buildings have other operational needs that require an energy input, for example electricity for lighting or cooking food. The energy needed to operate the building is referred to as the 'energy demand'.
- 22.71 By making the building fabric as energy efficient as possible the remaining energy demand can be reduced sufficiently such that the demand can be met entirely by power generated from renewable energy sources 'on site' (such as solar photovoltaic panels or PVs). If a building can meet its energy demand entirely through on-site renewable energy sources it has achieved Net Zero Operational Carbon.

Offsetting

- 22.72 Offsetting emissions is discouraged and should only be used in exceptional cases where it is demonstrated that it is not technically feasible to achieve Net Zero Operational Carbon via on-site or off-site measures.
- 22.73 In exceptional circumstances, s proposals may need to pay a Renewable Energy Offset Charge where cash-in-lieu contributions are used to offset the shortfall between the amount of renewable energy generated on site and the EUI of the development (both expressed in kWh/sqm/GIA).
- 22.74 Previously Haringey's carbon offset price was measured per tonne of CO₂, and determined by a price set by the GLA. Haringey's new net zero operational carbon policy targets are measured in kilowatt hours (kWh), rather than carbon emissions. Therefore, Renewable Energy Offset Charges will supersede the previous 'carbon offset' approach.
- 22.75 Where applicants make a cash-in-lieu contribution, this will be calculated by identifying the shortfall between the Energy Use Intensity (EUI) of the development and the amount of renewable energy generated on site, as follows:
- 22.76
$$\text{Energy Use Intensity (EUI)} - \text{On-site Renewable Energy Generation (OREG)} = \text{Renewable Energy Offset Shortfall (REOS)}$$
- 22.77 **Scenario 1 – Haringey's Solar Energy Offset Rate:** The development achieves the minimum requirement for Space Heating Demand (SHD) and Energy Use Intensity (EUI) and has maximised on-site renewable energy generation. In this scenario, the offset price is based on the indicative cost of funding solar photovoltaic panels (PVs) elsewhere in the borough:

- 22.78 Haringey's Solar Energy Offset Rate ('Tier 1' offset rate) applies and the total price is calculated over a 30-year period as follows: REOS x Tier 1 offset rate x 30
- 22.79 **Scenario 2 – Haringey's Retrofit Energy Offset Rate:** The development does not achieve the minimum requirement for Space Heating Demand (SHD) and has maximised on-site renewable energy generation. In this scenario the building fabric could require retrofitting in future, therefore a different offset rate is applied:
- 22.80 Haringey's Retrofit Energy Offset Rate ('Tier 2' offset rate) applies and the total price is calculated as follows: REOS x Tier 2 offset rate x £42
- 22.81 At the current time, evidence suggests a 'Tier 1' offset rate of £1.32 per KWh/yr for developments that comply with both EUI and Space Heating Demand policy targets, to reflect the cost of installation and management of solar PV installation offset measures. A higher 'Tier 2' rate of £42 per KWh/yr is applied for developments that are only able to comply with one of the two policy targets and have demonstrated that they have maximised all opportunities to improve the energy efficiency of the building design. This higher rate reflects the construction cost of energy retrofit measures to the Council.
- 22.82 Construction costs will typically vary over the lifetime of a Local Plan, therefore the Council will review and update the energy offset rates and publish them on Haringey's website to reflect the latest cost-related evidence. Applicants must refer to the Council's latest guidance for energy offset rates which will supersede the rates stated above.

Implementation

- 22.83 It should be set out in an Energy Statement the level of on-site renewable energy proposed for supply together with information about how on-site renewable energy opportunities have been maximised

Policy CE7: Assuring Energy Performance

- A. Major developments and minor developments creating new residential and/or commercial units should be supported by an Energy Statement detailing how the proposal will deliver a Zero Carbon Balance in accordance with Policy CE1 and should also contain relevant appendices as required for the implementation of Policies CE2 to CE6.
- B. For major developments and minor developments creating new residential and/or commercial units the Energy Statement should contain Energy Use Calculations using a Passive House Planning Package model or equivalent as well as a method statement and marked up drawings.
- C. For major developments only the following should be appended to the Energy Statement and referred to within the statement as relevant:
 - (1) Whole Life Carbon Assessment
 - (2) Circular Economy Statement
 - (3) Overheating Risk Assessment
- D. For major developments and minor developments creating new residential and/or commercial units an assured performance standard such as Passivhaus or BREEAM must be used to demonstrate that operational energy performance targets will be achieved on site. All other types of development are encouraged to use an assured performance standard, as appropriate.
- E. All proposals involving retrofit of existing buildings must submit a Retrofit Method Statement.
- F. Major development proposals should disclose to the Council the anticipated energy demand at pre-application and planning application stage and the actual energy demand at pre-occupation stage.

Supporting text

Operational Carbon Hierarchy – ‘Be Seen’

- 22.84 This policy formalises the Council’s requirements for developments to be supported by Energy Statements and associated documentation, sets clear expectations about their content, and details how energy performance should be assured consistent with the fourth part of the Operational Carbon Hierarchy – ‘Be Seen’. The final part of the hierarchy is based on the principle that to truly achieve net-zero-carbon buildings we need to have a better understanding of their actual operational energy performance and work towards bridging the ‘performance gap’ between design theory and actual energy use.

Energy Statements

- 22.85 Energy Statements are the key mechanism for applicants and developers to demonstrate compliance that the Local Plan's Climate Emergency & Buildings policies.
- 22.86 The harmful impacts of climate change often fall hardest on our most vulnerable communities. By moving to a zero carbon borough we can help mitigate these effects, and proactively address inequalities and improve health and wellbeing. For example, our policies will help to create warmer, more comfortable living and working environments that benefit health, address fuel poverty by requiring more energy efficient homes, and will avoid emissions and air pollution.
- 22.87 To ensure we are proactive in maximising these benefits, Energy Statements should , where appropriate, identify where opportunities to improve health and wellbeing and address social inequities have been identified and pursued. This includes:
- improving the level of thermal comfort and reducing energy costs for vulnerable communities, such as low-income groups and older people.
 - engaging with local communities to ensure the development addresses their needs.
 - supporting local job creation, education and skills training in sustainable construction

Assured performance standards

- 22.88 It is important that operational energy targets will be achieved on site therefore the policy sets requirements for an assured performance standard to be used such as Passivhaus or BREEAM.
- 22.89 Our current adopted methodology for assessing what is 'zero carbon' uses the measures set out in the London Plan. These are based on the extent to which a proposed new building is an improvement over the minimum standards for a 'notional building' under Part L of the Building Regulations. It is widely accepted that there is usually a significant difference between predicted and actual energy performance when using the Part L methodology to calculate performance – this is often referred to as the 'performance gap'. There are several reasons for this 'performance gap'. The approach does not sufficiently encourage or reward more energy efficient buildings, tends to over-estimate carbon savings, relies more on offsetting, and does not address unregulated emissions generated by equipment such as fridges, washing machines, computers etc. which can represent up to 50% of a building's operational emissions.
- 22.90 The Passivhaus Standard is an internationally recognised energy performance standard developed by the Passivhaus Institute in Germany. Passivhaus homes reduce the requirement for space heating and cooling by up to 75% compared to standard practice for UK new build, whilst also creating excellent indoor comfort

levels. They are built and designed with meticulous attention to detail and are independently certified through an exacting quality assurance process. Basic design decisions such as massing, orientation and window size are fundamental to achieving the required levels of energy efficiency. Unlike other energy standards, therefore, Passivhaus must be embedded from the earliest stages of the design process.

22.91 Major developments must disclose to the Council the anticipated energy demand at pre-application and planning application stage and the Council will condition related planning permissions to require that actual energy performance is reported at pre-occupation stage.

23. Sustainable Travel

Introduction

23.01 Our transport system comprises the transport infrastructure and transport modes that allow people and goods move from place to another. The sustainability of our transport is crucial for the following reasons:

- Accessibility of walking, wheeling, cycling, and public transport is central to being a fair borough where everyone has the same opportunities to live well.
- A well-functioning transport system supports our health and wellbeing, connecting us to the people and places we need to live healthy and productive lives.
- The way in which we move around impacts heavily on our goal to become a net-zero borough by 2041. Over a fifth of our carbon emissions currently derives from road-based motor transport.
- Being a well-connected borough is key to the success of our economy, encouraging investment and enabling us to access business opportunities, goods, and markets across London and beyond.

23.02 The NPPF and London Plan both require Local Planning authorities to promote sustainable transport. Local Plans are expected to support the Mayor of London's strategic target of 80% of all trips in London being made by foot, cycle or public transport by 2041.

23.03 In recent years Haringey has taken big steps towards creating a more sustainable transport system. We have adopted an ambitious Walking & Cycling Action Plan (2022) to drive our active travel agenda, improve the health and wellbeing of residents and tackle climate change by reducing reliance on private motor vehicles. We have been delivering our ambitious Streets for People initiative at pace including implementing three Low Traffic Neighbourhoods, significantly expanding our School Streets programme, introducing the Haringey Dockless Bike Hire Scheme pilot, and improving key elements of our cycling network.

23.04 One of the six Placemaking Priorities of this Draft Local Plan is 'Connecting to Opportunity: 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'. The Sustainable Travel policies that follow set out how future development in the borough should contribute positively to this priority.

23.05 The borough's highways and streets make an important contribution to the liveability of the borough. For example, a significant portion of our green infrastructure is integrated within them. The design of our highways and streets is key as it affects how safe we feel as we navigate them and their contribution to the unique character of our communities.

Policy T1: Achieving Sustainable Travel

- A. Development should take a vision-led approach to transport planning. As part of this, all proposals must:
- (1) be located where transport needs can be met in a sustainable manner
 - (2) employ a 'Healthy Streets' approach as set out in the London Plan
 - (3) create Streets for People by recognising streets as places and not just transport routes, reducing the dominance of private vehicles, only providing car parking in accordance with Policy T5, and contributing to an environment where for, those who can, walking, wheeling and cycling are a first choice for travel
 - (4) give priority of movement and road space according to the following hierarchy:
 - a Pavement/footway users
 - b Cycling
 - c Public transport
 - d Vehicle sharing networks
 - e Motor vehicles
 - (5) ensure that significant impacts on the operation and/or safety and sustainability of the borough's transport system and on traffic conditions and road safety are avoided and/or mitigated
 - (6) create safe neighbourhood environments that improve personal security and road safety, contributing to the Vision Zero objective, and reducing transport-related emissions and linked air and noise pollution
 - (7) safeguard infrastructure and routes for walking, wheeling, cycling and public transport and help contribute and deliver improvements and other transport initiatives to facilitate sustainable travel
 - (8) improve equity of access by considering and responding to the needs of vulnerable transport users, including children, elderly people, people with disabilities, and lower socio-economic groups.
 - (9) employ a design-led approach in accordance with Policy D1 that recognises the role of streets as part of the public realm, enhances local character, and responds to local needs.
 - (10) support efficient and sustainable freight, deliveries, and servicing
- B. Applications should be supported by a Transport Assessment, Transport Statement in line with Transport for London published guidance. Evidence submitted should demonstrate that, where necessary, identified transport impacts will be appropriately mitigated.

23.06 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Improving equity of access and requiring inclusive design of the transport system

Supporting a greater choice of sustainable travel modes, for all

A HEALTHY & SAFE PLACE

Supporting the Mayor of London's 'Healthy Streets' Approach

Supporting the Vision Zero objective, to eliminate all deaths and serious injuries on London's transport network by 2041

Reducing transport-related emissions air and noise pollution, and minimising construction effects

A SUSTAINABLE & RESILIENT PLACE

Prioritising sustainable transport modes and investment in sustainable transport infrastructure

Reducing reliance on private vehicle travel and parking

Supporting Text

- 23.07 The NPPF requires a vision-led approach to promoting sustainable transport modes. This is a strategic approach that prioritises a clear vision for the future of a place before determining transport solutions. It shifts away from simply predicting and accommodating future traffic demands (predict and provide) towards creating a desired future and then identifying the necessary transport interventions to achieve it. A vision-led approach for a site should be informed by the Haringey Placemaking Framework, neighbourhood chapters, early engagement and other relevant strategic documents including the Haringey Transport Strategy, emerging Transport Strategy and Walking and Cycling Action Plan.
- 23.08 The London Plan and the Mayor of London's Transport Strategy aim to reduce dependency on cars in favour of increased walking, cycling and public transport use, with a strategic target for Haringey of 88 percent of all trips being made by foot, cycle or public transport by 2041⁶. This plan has had specific regard to helping deliver the Mayor of London's Transport Strategy.
- 23.09 This policy supports these aims and the vision set out in our Haringey Transport Strategy (2018) and reiterated in the Walking and Cycling Action Plan (2022) to make 'walking, cycling and the use of public transport a first choice for all'. A transport hierarchy is set out to facilitate the rebalancing of the road network in accordance with this vision.

⁶ This figure was 77 percent in 2019

- 23.10 Moving to more sustainable transport modes is the best way to significantly reduce the nearly one fifth of Haringey's carbon emissions that come from road-based motor transport and help achieve the 2041 Net Zero Carbon target set out in the Haringey Climate Change Action Plan (2021).
- 23.11 It is also in accordance with the Mayor of London's 'Healthy Streets' approach which seeks to create neighbourhoods which have facilities and the amenities to reduce the need to travel and which facilitate residents making shorter, regular trips by active travel where possible, improving the health and wellbeing of our residents, and creating a safe and attractive streetscape that will help realise Vision Zero: to eliminate all deaths and serious injuries on London's transport network by 2041.
- 23.12 Undertaking this modal shift and supporting sustainable freight, deliveries and servicing has economic benefits; reducing transport costs, improving footfall resulting in higher local retail spend, and attracting new businesses and jobs by creating a more attractive, desirable environment.
- 23.13 Access to public spaces and sustainable transport options is a matter of social justice. Hostile, polluted, motor-centric streets can disproportionately threaten our more vulnerable populations. These include those in more deprived areas of the borough with the lowest levels of car access, children in areas with little or no garden space, and those with disabilities or pre-existing health conditions like respiratory issues.
- 23.14 Development should support the provision of safe, accessible, and inclusive streets and travel options. It should help to enable everyone to fully engage with society and access key services and facilities locally, as well as the diversity of opportunities offered within London as a whole. While the policy aims to reduce reliance on private vehicles, achieving equity of access and opportunity requires development to ensure that options are provided for those who may be unable to use public transport or active travel.

Transport Assessments, Transport Statements

- 23.15 Impacts on the transport system include changes to the way that a site is accessed from the highway or changes to the number, mode, or profile of trips to and from the site. For information on the transport evidence that will be required in support of an application, applicants should refer to the Council's Planning Local Validation Checklist and to the thresholds for Transport Assessments and Transport Statements set out in Transport for London's published guidance. As noted in this guidance, the thresholds should not be read as absolutes and therefore there will be some schemes that do not meet the threshold but for which the Council will require a transport assessment or statement.

23.16 Submitted evidence should contain a summary demonstrating that the proposal complies with relevant policies in this plan and should also demonstrate that the proposal is acceptable in transport terms or how it could otherwise be made acceptable through alterations or mitigation.

Policy T2: Walking

- A. Proposals must prioritise pedestrians and will be supported where development achieves this and take opportunities to enhance the borough's existing walking network and/or deliver high-quality expansions of it.
- B. Applications should provide supporting evidence to demonstrate that pedestrian movement has been fully considered as part of the design process and informed the proposed design solution.
- C. Proposals should facilitate safe, direct, and attractive pedestrian routes both within the site and to/from the site and key destinations surrounding the site. Opportunities should be taken to improve permeability and address severance.
- D. Major development proposals should be accompanied by an Active Travel Zone assessment and will be expected to contribute to local improvements to walking infrastructure and the pedestrian environment including road crossings and wayfinding.
- E. Development should deliver an inclusive pedestrian environment, demonstrating an applied understanding of the predicted users of the site and local needs, in particular those of children, older people, and those with disabilities and/or mobility needs. Footways provided in relation to new development should be suitable for all pavement users and should be of sufficient size and standard for the expected level of use. Where appropriate, formal and/or informal seating should be provided.
- F. Proposals which remove or reduce the impact of street clutter will be supported.

Supporting text

- 23.17 Walking is an important part of everyday life for most of our residents, whether it be to get to work or access services, or for leisure or exercise. People do not just move from A to B but also take time to rest, sit, stand, and engage with the people and places around them. Walking has many benefits, improving physical and mental health, reducing pollution and carbon emissions, and is the cheapest way to travel.
- 23.18 This policy supports the ambition set out in the Walking and Cycling Action Plan (2022) for walking to be the natural choice for people who are able to, enabling easy access our local centres, amenities, schools, destinations, green spaces, and walking assets like the Parkland Walk and Tottenham Marshes.
- 23.19 For the purposes of this policy and the wider plan, walking is used as a catch-all term to cover foot/pedestrian-based mobility and 'wheeling' an equivalent alternative to

foot/pedestrian-based mobility. Foot/pedestrian-based mobility may incorporate the support of aids to mobility such as sticks, canes, crutches, the arm of another person and/or assistance animals. Wheeling includes wheeled mobilities such as manual self- or assistant-propelled wheelchairs powered wheelchairs, mobility scooters and rollators.

- 23.20 Development is expected to deliver opportunities to expand the pedestrian network and address barriers to the use of its (for example busy main roads, railway lines) as well as improve its quality. Multifunctional environments should be created, which support people's ability and desire to walk, while creating attractive, safe spaces that support social interaction and are usable to as many people as reasonably possible without the need for special adaptation.

- 23.21 Opportunities should be fully explored to improve the pedestrian environment in placemaking focus areas, around town centres and schools, along the Walk London network, and on key routes identified in the Neighbourhood Chapters of this plan and in the Council's Walking and Cycling Action Plan.

- 23.22 Where improvements are necessary to support new development and make it acceptable in planning terms, contributions will be secured through Section 106 and/or Section 278 agreements. Regard will be had by the Council to infrastructure requirements identified in the Council's Infrastructure Delivery Plan, in the Walking and Cycling Action Plan and in the Road Danger Reduction Action Plan.

- 23.23 It is expected that larger developments will contribute to improved wayfinding within the pedestrian network. Wayfinding should point out links to key destinations such as town centres, transport hubs, parks, and public toilets, as appropriate. Provision should also be made for formal and informal seating in busy pedestrian areas and along main walking routes. Lack of rest areas is identified as a key barrier to many residents making trips by foot.

- 23.24 Adherence to this Policy should be demonstrated via Transport Assessments and Transport Statements. These should consider not only the existing environment but planned changes, including Local Implementation Plan schemes and other planned development.

Policy T3: Cycling

- A. Proposals will be supported where they promote cycling and take opportunities to enhance the borough's existing cycling network and/or deliver highly quality expansion of it. Development that has a negative impact on the borough's cycling network will not be supported.
- B. Applications must provide supporting evidence of their analysis of cycling considerations as part of the design process and set out how this has informed the proposed design solution.
- C. Proposals should ensure a safe and accessible environment for cyclists and contribute to connected, high quality, convenient and safe cycle routes for all.
- D. Major development proposals that are not within 400m of the strategic cycle network will be expected to contribute towards initiatives which promote cycling and/or to new and improved cycle connections to the network.
- E. Proposals should provide cycle parking facilities for building users and visitors in accordance with the higher minimum standards in London Plan Policy T5. In addition, the Council will require:
 - (1) At least 25% of the total cycle parking provision to be of the most accessible type, such as 'Sheffield' stands.
 - (2) At least 5% of the total cycle parking provision to be designed and clearly designated for larger and adapted cycles including cargo bikes. These stands should be spaced further apart and close to access points to cater for users with disabilities and cargo bikes.
 - (3) Provision of bike pump and repair facilities
 - (4) Provision of charging points for electric cycles where this can be delivered safely
 - (5) Student accommodation to provide a minimum of 1 space per bedroom
- F. Cycle parking should be secure, sheltered, easily accessible to users, and provide sufficient space to meet cycle parking standards. Proposals should demonstrate that cycles (including larger and adapted cycles and cargo bikes) can be easily manoeuvred into and out of cycle storage. Proposals for workplaces should make provision for facilities that promote cycle usage.
- G. Major developments should, having regard to local provision, design in cycle hire infrastructure and/or micromobility hire infrastructure.
- H. Cycle storage in front gardens of residential properties will be supported provided it is of a high-quality design, not visually intrusive, and does not harm the amenity of surrounding properties, having regard to:
 - (1) The size of the shed or storage shelter, the building and the garden;

- (2) Its location and accessibility;
- (3) Level of screening; and
- (4) The nature of the materials used

Supporting text

- 23.25 Cycling provides many environmental, health, social and economic benefits. It is one of the most efficient ways to travel across and within London. Haringey has huge potential for increasing cyclable trips which could be realised by addressing gaps in our cycle infrastructure.
- 23.26 The Council's Walking and Cycling Action Plan sets out an ambition for our cycle routes and facilities to be among the best in London. New developments provide an opportunity to achieve this ambition by supporting the strategic cycle network, closing network gaps, and facilitating cycle trips within the borough and across London. They can also provide important cycling infrastructure like cycle parking. People will not cycle if they do not feel like they can safely and easily park their bikes, both at home and at their destinations.
- 23.27 Major development proposals that are not within 400m of the strategic cycle network will be expected to contribute to improvements to the borough's cycling network and/or to initiatives which promote cycling. New and enhanced cycling routes should comply with the latest cycle infrastructure design guidance such as Local Transport Note 1/20 and London Cycling Design Standards.
- 23.28 Where deemed necessary to make a development acceptable in planning terms, improvements and/or contributions will be secured through Section 106 and/or Section 278 legal agreements. Particular regard will be had by the Council to infrastructure requirements identified in the Council's Infrastructure Delivery Plan, the Walking and Cycling Action Plan and the Road Danger Reduction Action Plan
- 23.29 Proposals should provide well designed, safe, accessible, and inclusive cycle parking facilities. People experience different barriers when it comes to cycling, so cycling infrastructure (including parking) must be designed to meet a range of user needs. Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards.
- 23.30 Lack of visitor cycle parking can be a major barrier to trips by bicycle. Where short-stay (visitor) cycle parking cannot be accommodated on site (for example if there is no public realm with direct access from the public highway or a dedicated off-street cycle store) then the Council will seek a financial contribution from applicants towards the provision of general cycle parking to be installed on street in the vicinity of the site.

- 23.31 Workplaces should make provision for high-quality facilities that support cycle usage including showers, changing rooms, lockers, and drying rooms. Provision should be proportionate to the scale of the development and number of cycle spaces.
- 23.32 The Council will support cycle storage in front gardens where appropriate. Cycle storage in front gardens should be single-tiered and should have level access from the street, avoiding steps and narrow doorways. If cycle storage in front gardens is not possible due to localised impacts or for other reasons, then applicants should work with Council officers to identify accessible alternatives. Full accessibility must be shown, either via side accessways or, as a last resort, through individual homes.
- 23.33 Adherence to this Policy should be demonstrated via Transport Assessments and Transport Statements. Evidence supporting applications should consider not only the existing environment but planned changes, including Local Implementation Plan schemes and other planned development.

Policy T4: Public Transport

- A. Proposals which adversely impact on the safety, functionality, reliability, or viability of existing public transport networks or are contrary to the safeguarding of public transport infrastructure will be refused.
- B. The Council will work with Transport for London, public transport operators, developers, and other partners to secure improvements to public transport infrastructure.
- C. Major development proposals should, where appropriate:
 - (1) contribute towards improvements to the bus network and associated infrastructure, including adding bus services, bus priority measures and frequency upgrades.
 - (2) contribute to improving rail infrastructure at local stations, including travel interchange facilities and step free access.
 - (3) contribute to improvements in the accessibility of the public transport network as part of an integrated transport system.
- D. Bus stops and bus stopping areas should be well located and designed, accessible and comfortable for all.
- E. Railheads will be safeguarded unless it can be demonstrated that a railhead is no longer viable or capable of being made viable for rail-based freight-handling.

Supporting text

- 23.34 We need to improve our public transport infrastructure to serve a growing population and provide people with greater and more sustainable opportunities to move around Haringey and connect to other parts of London and beyond. Having a safe, easy, and effective public transport system will also reduce reliance on private cars and help achieve our emissions target.
- 23.35 A particular focus is required to ensure public transport is accessible to everyone, especially for those with disabilities, young children, the elderly and others who currently face barriers when seeking to use public transport. Proposals for new or improved public transport infrastructure, or which have an impact on the public transport system should seek to address these barriers and improve equity of access to public transport.
- 23.36 Proposals should be designed to facilitate an integrated transport system, for example improving interchanges between public transport modes, improving walking and cycling connections to public transport stations and stops, and providing wayfinding.

23.37 Where deemed necessary to make a development acceptable in planning terms, improvements and/or contributions to public transport will be secured through Section 106 and/or Section 278 legal agreements. Particular regard will be had by the Council to infrastructure requirements identified in the Council's Infrastructure Delivery Plan.

Policy T5: Car Parking

- A. To reduce car usage and promote active travel, the following parking principles will be applied to new development:
- (1) proposals in areas of higher public transport accessibility level (PTAL 4-6) should be 'Car Free', with parking limited to parking for disabled users and any other essential operational or servicing needs as justified through a Transport Assessment
 - (2) proposals elsewhere should be designed to provide the minimal necessary parking (known as 'Car-Lite')
 - (3) All car parking should be provided within the development site and not on the public highway.
 - (4) Where a site with existing on-site parking is being redeveloped, parking provision should be reduced to comply with the relevant car parking standards. A higher level of parking provision will only be acceptable where there is a robust site-specific justification.

Residential Parking

- B. New residential development including conversions should not exceed the maximum parking standards set out in Table 1.

Table 1: Residential Parking Standards

Location	Number of beds	Maximum parking provision
PTAL 4-6	All	Car free (except for disabled person parking and any other parking essential for operational or servicing needs)
PTAL 3	1-2	Up to 0.25 spaces per home
PTAL 3	3+	Up to 0.75 spaces per home
PTAL 0 -2	1-2	Up to 0.5 spaces per home
PTAL 0 -2	3+	Up to 1 space per home

- C. For developments involving a net gain of 5 homes or more a parking stress survey will be required and car free will be secured via Section 106 legal agreement with future owners and occupiers prevented from applying for an on-street parking permit.
- D. The Council will permit a higher level of car parking where existing housing is being redeveloped provided that:
- (1) Car parking has been reduced to meet the minimum needs of returning residents. Where parking exceeds the Council parking standards, evidence of parking need should be provided
 - (2) Existing occupiers with established parking spaces or permits are to return to the site once the development is completed and that the retained or re-provided parking is for those residents only

- (3) The retained or re-provided parking is delivered alongside targeted measures to promote walking and cycling
- E. Disabled persons parking should be provided for new residential developments. For major developments, a minimum of 10% of homes should have a designated disabled persons parking bay. These spaces should be available immediately upon completion of the development and it is expected that these will be designed and delivered for wheelchair user homes in the development.
- F. Car parking provided must be allocated equitably, including between market and affordable homes. Applicants will be required to provide details on the allocation and management of on-site car parking. Car parking should be leased and allocated in the following order of priority:
 - (1) Wheelchair accessible homes or to residents with a disability and the need for a car parking space
 - (2) Family sized homes (3 bedrooms and larger)
 - (3) 2 bed homes
 - (4) Any other homes
- G. Developments involving a net gain of 5 homes or more should contribute towards the expansion of the local car club network.
- H. Infrastructure for Electric and Ultra-Low Emission vehicle infrastructure should be provided in accordance with the London Plan (provision for both active and passive infrastructure).

Non-residential car parking

- I. Parking provision for non-residential development should not exceed the maximum car parking standards set out in the London Plan.
- J. Leisure or retail car parking within town centres should be shared with public parking and not reserved for customers of a particular development. On-site town centre parking should be:
 - (1) Appropriately located and sized to support the viability of the town centre and ensures the use of the site is optimised; and
 - (2) Support the rapid turnover of spaces; and
 - (3) Include maximum stay restrictions; and
 - (4) Provide alternative access to the use of a car by providing car club bays
 - (5) Consider the need for safe parking options for motorcycles and mopeds
- K. Parking stress surveys may be required for non-residential developments having regard to their location and character.

Parking Design and Management Plan

- L. In accordance with the London Plan, a Parking Design and Management Plan should be submitted alongside all applications which include car parking provision

Removal and redevelopment of car parking

- M. Proposals for the redevelopment of existing car parks and garages for alternative uses will be supported, subject to a Transport Assessment. Adverse impacts of loss of parking on those with disabilities and mobility needs should be appropriately mitigated. Proposals for new standalone public car parks (and other motor vehicle public parking) will be refused.
- N. The Council will support the removal of off-street parking where it accords with Policy T1.

Supporting text

- 23.38 The Council seeks to reduce car usage and promote active travel. Limiting or reducing opportunities for parking can lessen congestion, improve health and safety, reduce air pollution and carbon emissions, and create environments that are more attractive for walking and cycling. Excessive car parking is also an inefficient use of scarce developable land in the borough.
- 23.39 The potential for encouraging people to shift their mode of travel away from the car is particularly strong in the most accessible parts of the borough. The Council expects new development in accessible areas to be ‘car-free’ i.e. it has general parking. Development in other parts of the borough should be ‘car-free’ or otherwise provide the minimum necessary parking which is known in the London Plan as ‘car-lite’.
- 23.40 Notwithstanding this, the Council recognises that the restriction of parking may have equity implications for some individuals and groups. New developments, even those that are ‘Car-Free’, will be required to provide disabled parking. The Council’s policy goes beyond the London Plan in terms of requiring all disabled parking for residential developments to be provided upfront upon the completion of development. This is necessary in Haringey having regard to the number of people in the borough who have a physical disability or otherwise have accessibility needs.
- 23.41 Car parking provided must be allocated equitably including between market and affordable homes. Residents in social housing (particularly families) do not have the same degree of choice over where they live compared with those in market homes and should not be unfairly disadvantaged by proposed parking allocations. If the level of parking proposed for affordable homes is less than that proposed for market homes, the disparity will need to be fully justified taking account of the estimated demand and information on relative levels of car ownership.

- 23.42 It is expected that all parking spaces should be provided within the development site and not on the public highway. Where evidence is presented that it is not possible to accommodate parking requirements on-site, the Council will consider on-street parking as an alternative. Where such a proposal is deemed acceptable, the Council will require payment of a commuted sum, considering both the cost of implementation and maintenance of any parking bay and infrastructure for electric or other Ultra-Low Emission vehicles, feasibility and capacity, as well as the opportunity cost of lost kerbside space, for example in terms of parking revenues.
- 23.43 Developments involving a net gain of 5 homes or more and non-residential parking will be required to support the borough's car club network through provision of spaces or financial obligations.
- 23.44 The provision of motorcycle parking as a substitute for car parking is supported within the maximum standards. As a guide, approximately five motorcycle spaces can be accommodated in place of each permitted car space.
- 23.45 The Council will permit parking for essential operational or servicing needs where the need for this is justified within the associated Transport Assessment and measures have been applied to minimise the number of vehicle trips.
- 23.46 Where appropriate, contributions will be required for on-street/ off-street provision of electric vehicle and other low emission vehicle infrastructure.

Policy T6: Vehicle crossovers

A. Proposals for a new vehicle crossover will be supported only where it can be demonstrated that it:

- (1) is necessary to support the new development;
- (2) will not result in a reduction in pedestrian or highway safety;
- (3) will not reduce on-street car parking capacity within a Controlled Parking Zone;
- (4) will not negatively impact on on-street electric vehicle charging infrastructure.
- (5) will not lead to the loss of, or harm to, high quality trees.
- (6) will not detract from the street scene and the historic environment; and
- (7) will not compromise drainage systems.

B. Proposals for the removal of vehicle crossovers will be supported where the proposal will not result in a reduction in pedestrian or highway safety.

Supporting text

23.47 A vehicle crossover (also known as a dropped or lowered kerb) provides the legal means for motor vehicles to drive over a pavement to park in a driveway. Crossovers increase risks to pedestrians of interactions with vehicles and can have a negative impact on the appearance and efficient functioning of the road network.

23.48 Proposals for new crossovers will be resisted unless a need is clearly demonstrated, and adverse impacts are mitigated. Any proposals for crossovers on the Transport for London Road Network will require approval by TfL. Proposals should be in line with TfL's Crossover Guidance and the Council's Crossover Guidance.

23.49 In accordance with the General Permitted Development Order, planning permission for a new or replacement driveway is not required provided that permeable (or porous) surfacing is used which allows water to drain through, such as gravel, permeable concrete block paving or porous asphalt. If the surface to be covered is more than five square metres planning permission will be needed for laying traditional, impermeable driveways that do not provide for the water to run to a permeable area.

Policy T7: Freight, Deliveries and Servicing

- A. Development will be supported where adequate provision is made for deliveries and servicing, and this is achieved in a safe, efficient and sustainable way. Provision must be:
 - (1) Appropriate to the scale, form and location of the proposed development,
 - (2) Acceptable in terms of impact on amenity of adjacent properties
 - (3) Acceptable in terms of impact on the highways network including the safe movement of pedestrians and cyclists.
- B. Major developments should be supported by a Delivery and Servicing Plan to demonstrate that that delivery and servicing matters have been appropriately considered and addressed, including for residents and business occupiers. This should identify how the chosen arrangements will support sustainable delivery and servicing.
- C. Development proposals should provide for on-site servicing, wherever practicable. This should allow all goods and refuse collection vehicles likely to service the development at the same time to be conveniently loaded and unloaded
- D. Development proposals should minimise the need for freight trips and applicants should explore opportunities to work together with adjoining owners and occupiers to manage freight and servicing on an area-wide basis.
- E. Wherever possible, delivery to and servicing of development should take place outside peak hours (i.e. morning and evening commuting peaks and school drop off and pick up times).

Supporting text

- 23.50 Commercial vehicles represent around one-sixth of all traffic in London, contributing to congestion, air pollution, and adverse effects on amenity. Taking this into account, it is important that development helps support a more efficient and sustainable transport network by planning to accommodate sustainable deliveries and servicing, taking opportunities for consolidation, and promoting deliveries at less busy periods of the day.
- 23.51 Major developments should be supported by a Delivery and Servicing Plan to demonstrate that adequate provision will be made for deliveries and servicing and that this will be achieved in an efficient and sustainable way. This should identify how the chosen arrangements will support sustainable delivery and servicing such as through providing parking and recharging provision for e-cargo bikes.
- 23.52 Delivery storage facilities should be provided, such as secure unattended or concierge-managed delivery facilities.

- 23.53 Development proposals should consider ways to reduce congestion caused by servicing and deliveries, such as implementing last-mile deliveries by foot, cycle or zero-emission vehicle, and should justify where such measures are not possible. Applicants will be encouraged to engage early with the Council to identify opportunities for last-mile logistic hubs to support sustainable deliveries.

- 23.54 Servicing areas should provide sufficient space or facilities for all vehicles to enter and exit the site in a forward gear. All development proposals should provide details of refuse and recycling collections, indicating locations for collection vehicles to wait and locations of refuse and recycling bin storage.

- 23.55 All developments proposals should consider opportunities for delivery consolidation including urban consolidation centres, micro-consolidation centres and pick up drop off,.

- 23.56 Off-site consolidation to reduce the number of deliveries should be considered for major development proposals (in particular non-residential and mixed-use developments) or where access to the site is constrained, while smaller developments should also include consolidation strategies such as common and local procurement.

- 23.57 Delivery and Servicing Plans will be required to assess the ongoing freight impact of the development and minimise and mitigate impacts on the transport system and nearby area. Use of low-emission vehicles and efficient and sustainable delivery systems which minimise motorised vehicle trips is encouraged. All major commercial developments should provide for freight consolidation.

- 23.58 Development proposals at logistics and industrial locations should identify opportunities to provide hydrogen refuelling stations and rapid electric vehicle charging points.

- 23.59 It is expected that servicing should be carried out on-site. Where evidence is presented that this is not possible the Council may consider allowing servicing on the public highway where this can be done safely and does not conflict with other highway objectives. In such situations the Council may seek a commuted sum, considering both the cost of implementation and maintenance of any loading bay, as well as the opportunity cost of lost kerbside space, for example in terms of parking revenues.

24. Green and Blue Infrastructure

Introduction

- 24.01 Green and blue infrastructure refers to the network of green and blue spaces and natural features in the borough. It includes our parks and playing fields, street trees, private gardens, green roofs, rivers, streams, and sustainable drainage systems.
- 24.02 Haringey is home to a wealth of green and blue infrastructure. The east of the borough contains part of the unique Lee Valley Regional Park, the borough has large public parks at Alexandra Palace and Finsbury Park as well as a network of smaller, local parks across the borough, and the Moselle Brook originates in Muswell Hill and Highgate flowing onwards through Tottenham and towards the Lea Valley.
- 24.03 Paragraph 187 of the National Planning Policy Framework sets out that planning policies should contribute to and enhance the natural environment and paragraph 192 sets out a range of ways in which biodiversity and geodiversity should be protected and enhanced.
- 24.04 Green and blue infrastructure provides a wide range of environmental, economic, health and wellbeing benefits for our communities, our natural environment, and the climate. It provides spaces for physical activity, healthy food growing, contemplation, and de-stressing, while reducing urban heat risk, noise pollution, flooding and poor air quality. In addition, it provides opportunities for our communities to socialise, play and hold events and pleasant routes to move through our borough, all of which serve to enrich our culture and sense of belonging.
- 24.05 The protection and enhancement of our blue and green infrastructure is key to mitigating and adapting to a changing climate and ensuring that our communities become more resilient in the future. Trees and vegetation play a key role in removing carbon dioxide from the atmosphere and blue and green infrastructure help the borough cope with more extreme weather events.
- 24.06 As the impact of climate change on weather and habitats becomes more pronounced, we are increasingly needing to explore ways to manage extreme hot weather as well as heavier rainfall and more frequent storms.
- 24.07 The evapotranspiration-based cooling benefits of green and blue space in cities is critical to maintaining comfortable air temperatures in our warming climate. Vegetation and trees also provide much needed external shading, protecting people from harm during heat waves. Vegetation can also play an important part in sheltering people from strong winds by reducing the wind tunnel effect in urban environments. Sustainable drainage systems can allow rainwater to be absorbed by the ground rather than flowing into the sewer network and thereby reduce risks of surface water flooding.

- 24.08 Local authorities in England have a duty to have regard to conserving biodiversity as part of policy and decision making, and restoration of river corridor wildlife and habitats also forms part of this responsibility.
- 24.09 The UK is consistently ranked in the 10% of worst-rated countries in the world for the extent to which its ecosystems have retained their natural animals and plants (biodiversity intactness)⁷, so local authorities have a duty to prioritise nature recovery and environmental net gain in their local plans in order to help restore the natural environment that has been lost so that we can protect the resilience and longevity of our planet.
- 24.10 Green and blue infrastructure can also deliver economic benefits by creating high-quality environments and places that attract visitors and investment that support the local economy.
- 24.11 It is essential that all people in our community, no matter where they live, have access to the significant benefits that green and blue infrastructure can provide.

⁷ Natural History Museum [2021 study](#) on Biodiversity Intactness

Policy G1: Green and Blue Infrastructure

- A. The Council seeks to protect, enhance and increase provision of green and blue infrastructure, including addressing deficiencies of such infrastructure where identified. This will be achieved through:
- (1) protecting Green Belt and Metropolitan Open Land from inappropriate development, in accordance with Policy G2
 - (2) protecting designated open space and securing new open space and recreational space from developments in accordance with Policy G3
 - (3) requiring development proposals to integrate green infrastructure and provide for urban greening in line with Policy G4
 - (4) protecting and enhancing the borough's biodiversity, including designated and undesignated sites, and delivering biodiversity net gain in accordance with policy G5
 - (5) protecting, maintaining and enhancing Haringey's trees and urban forest consistent with Policy G6
 - (6) supporting the provision of community food growing sites as part of new development and as a meanwhile use on vacant or under-utilised sites in accordance with Policy G7
 - (7) protecting and enhancing the borough's watercourses in accordance with Policy G8

Green & Blue Infrastructure Principles

- B. Proposals must be designed and delivered in accordance with the following Green & Blue Infrastructure Principles and will be supported where they are demonstrated to do so:
- (1) Consider opportunities to protect, enhance and increase provision of green and blue infrastructure from the earliest stage of the planning and design process
 - (2) Respond positively to existing green and blue infrastructure and provide new green and blue infrastructure which maximises benefits for local communities, enhances local character and contributes to a sense of place
 - (3) Promote access to, and strengthen the network of, green and blue infrastructure in the borough and across London, reducing inequalities in the ability for people to experience and enjoy such spaces
 - (4) Enhance the benefits that nature provides to our communities, the environment and our climate, seeking to maximise environmental net gain, and supporting nature to thrive and recover
 - (5) Deliver benefits for current future generations by ensuring green and blue infrastructure supports resiliency and adaptation to a changing climate and also that such infrastructure is resilient itself and that it will be efficiently managed and maintained.

- (6) Optimise the multi-functionality of green and blue spaces in a way which supports nature but also provides for the needs and aspirations of the borough's communities.

Green and Blue Infrastructure Plans

- C. Major developments must be supported by a Green and Blue Infrastructure Plan (which may be part of a Design and Access Statement) setting out how the development has been designed to put into practice the Green & Blue Infrastructure Principles and adheres to policies in this chapter. The Green & Blue Infrastructure Plan must set out how the infrastructure delivered within (or associated with) major new developments will be managed, maintained, and monitored for an appropriate period.

24.12 This policy contributes to the Haringey Placemaking objectives as follows:

A SUSTAINABLE & RESILIENT PLACE

Help reduce the causes and effects of climate change, and support communities to adapt to a changing climate

A HEALTHY & SAFE PLACE

Enhance and increase provision of green and blue infrastructure to support the health and wellbeing of communities

A FAIR PLACE

Improve identified deficiencies across the borough in terms of green and infrastructure e.g. canopy cover

Reduce inequalities in the ability for people to access, experience and enjoy green and blue spaces

Supporting Text

Protecting, enhancing and increasing green and blue infrastructure

24.13 The starting point for achieving the aspirations of the Local Plan is to protect existing green and blue infrastructure in the borough. This is made up of a mosaic of different assets ranging from Local Nature Reserves, Sites of Importance for Nature Conservation and the Lee Valley Regional Park which contains European designated sites and is a Site of Special Scientific Interest (SSSI). Fully delivering on the Council's aspirations will require significant enhancement of existing green and blue infrastructure as well as provision of new infrastructure. New development provides a key opportunity to help facilitate and deliver this.

24.14 Unfortunately, not all people or parts of Haringey have access to equivalent blue and green infrastructure and spaces and therefore to the benefits that nature provides.

For example, there are clear differences in access to green spaces and tree canopy cover which are both much more limited in the east of the borough versus the west.

- 24.15 Even when people may live close to a green space, concerns over physical access, safety, or a feeling that the park doesn't cater to their needs might mean that they don't access the space or benefit from it. We need to consider how green and blue infrastructure can serve people of different ages, gender, abilities and backgrounds.
- 24.16 Development proposals should seek to deliver and/or support green and blue infrastructure that addresses inequalities and allows us all to benefit more from a healthy natural environment
- 24.17 To maximise the benefits of green and blue infrastructure, consideration should be given to this as early as possible in the design and development process, in advance of other built infrastructure, like transport and communications.
- 24.18 The Council will expect site appraisals and early pre-application discussions to include issues, opportunities and a high-level strategy for green and blue infrastructure.

Promoting access to a network of green and blue spaces

- 24.19 Existing blue and green infrastructure in Haringey is made up of a network of spaces and infrastructure types. Some of these are larger and some smaller and some are connected and some are isolated. It is important that new development promotes access to green and blue infrastructure through delivery of new infrastructure as well supporting the fullest possible integration of the network, considering not just linkages within the borough but also across the wider capital.

Respond positively to existing green and blue infrastructure

- 24.20 Our green and blue spaces contribute in a major way to sense of place, helping people to connect with their local environment. Development proposals should take account of local design codes, character studies, and Conservation Area Appraisals & Management Plans, public feedback and stakeholder engagement to understand how green and blue infrastructure can be designed to enhance existing positive characteristics and address negative characteristics.

Enhance the benefits of nature

- 24.21 Ecosystem services are the benefits society gets from the natural environment. These include the food we grow, the shade trees provide, the clean air we breathe, the water we drink, soils we grow food in, and the positive effect nature has on our mental and physical health.
- 24.22 The Government's 25 Year Environment Plan includes a policy of "embedding an 'environment net gain' principle for development, including housing and infrastructure".
- 24.23 Environmental net gain is an approach to development that leaves both biodiversity and the environment in a measurably better state than prior to development. This

includes protecting existing habitats, improving water and air quality, flood protection and ensuring that lost or degraded environmental features are compensated for by restoring or creating environmental features that are of greater value to wildlife and people.

- 24.24 Biodiversity net gain is a narrower measure that refers only to habitats. It is both a legislative requirement and supported through the National Planning Policy Framework. The London Plan contains policy tools to help achieve wider environmental net gain: biodiversity net gain and the urban greening factor.

Support increased resiliency

- 24.25 Green and blue infrastructure can help to make places more resilient and adaptive to climate change, as well as help us meet our net zero carbon emissions ambitions. Development proposals should be strategic in how benefits are maximised. For example, it is not just about planting a tree to increase notional tree canopy cover. The location, type, supporting infrastructure, and long-term maintenance of a tree must all be considered to ensure that it survives and delivers the benefits we seek.

- 24.26 Our green and blue infrastructure has a higher chance of maximising benefits over the long term if local people and stakeholders are engaged in its design, delivery and management. Collaboration and co-design can help build trust, encourage more people to use the spaces positively, and to care for the infrastructure that is build.

Multi-functionality of green & blue space

- 24.27 In places like Haringey where there is a scarcity of land it is particularly important to ensure that our green and blue infrastructure works hard to deliver a range of functions and benefits for people and the environment.

Policy G2: Green Belt and Metropolitan Open Land

- A. Proposals within the Green Belt will be supported where this is in accordance with the National Planning Policy Framework. The Green Belt will be protected from inappropriate development and proposals which constitute this will not be approved except in very special circumstances.
- B. Metropolitan Open Land will be protected from inappropriate development consistent with the London Plan and having regard to the role of Metropolitan Open Land as London's critical strategic open space network. Proposals on Metropolitan Open Land will be supported where this is in accordance with the London Plan and does not compromise the function of Metropolitan Open Land as described in the London Plan.
- C. Development involving the reconfiguration of existing buildings and structures on Metropolitan Open Land will only be supported where it is part of a comprehensive scheme that:
 - (1) Results in no net loss of open space
 - (2) Does not have a greater impact on openness than the existing development
 - (3) Enhances either capacity, quality, range of uses or accessibility of the space with a focus on addressing any existing deficiencies.

Supporting Text

- 24.28 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open. The Government attaches great importance to Green Belt and the National Planning Policy Framework provides clear policies to protect the essential characteristics of Green Belts which are their openness and their permanence. Haringey only contains a small amount of Green Belt as part of a larger expanse of Green Belt within the Lee Valley. Consistent with the National Planning Policy Framework, Green Belt in Haringey will be protected from inappropriate development and proposals which constitute this will not be approved except in very special circumstances. The Framework does however provide for various exceptions where development in the Green Belt is not inappropriate. Notably, this includes development of homes, commercial and other development on 'grey belt' land, subject to specific criteria.
- 24.29 In Summer 2025, the GLA began conducting a London-wide Green Belt Review which will include consideration of Green Belt land in Haringey and make recommendations regarding its future designation, including whether any of it meets the definition of 'grey belt' as defined in the NPPF.

- 24.30 Metropolitan Open Land (MOL) comprises strategic open land within London's urban area. The London Plan 2021 therefore affords MOL significant protection from inappropriate development affording it the same status and protection of protection as Green Belt. Having regard to changes to national Green Belt policy in the NPPF which may mean that the next London Plan takes a different approach to MOL, it is important to note the general justification for protecting MOL to a high extent, particularly its role as London's critical strategic open space network. The Council will protect MOL in line with the wider policy intent.
- 24.31 In Haringey, MOL provides some of the Borough's most important open land, helping to provide structure and distinguishment to the built-up area as well as making a valuable contribution to the London-wide green infrastructure network. This includes part of the Lee Valley regional park, and significant public open spaces such as Alexandra Palace park and Highgate Wood and Queen's Wood. MOL plays a key role in delivering many wider green infrastructure benefits such as combatting flooding and mitigating the urban heat island effect. As such, the Council must give these spaces a high level of protection.
- 24.32 The borough has two golf courses which fall within MOL. Under the London Plan 2021 golf courses in MOL are afforded the same protection as any other land use within MOL, although it is noted this could be subject to review as part of the next London Plan.

Policy G3: Open Space and Recreation

Protection of Open Space

- A. Designated open space will be protected and, where possible, enhanced.
- B. Proposals involving the loss of designated open space will not be permitted unless development:
 - (1) provides essential ancillary facilities (e.g. changing rooms, play equipment, outdoor gyms, pedestrian and cycle links, public toilets, cafes) that will enhance the function, use, accessibility and enjoyment of the existing open space; or
 - (2) provides new outdoor uses, the recreational and sporting benefits of which would outweigh the harm resulting from its loss;
 - (3) is temporary in nature and the open space will be restored back to its original purpose
 - (4) re-provides replacement open space (as part of the wider development site or within a suitable alternative location within the catchment area) of equivalent or better-quality provision which is accessible to the public
- C. Development involving the reconfiguration of existing buildings and structures on designated open space will only be supported where it is part of a comprehensive scheme that:
 - (1) results in no net loss of open space;
 - (2) enhances either capacity, quality or accessibility of the space with a focus on addressing any existing deficiencies.
- D. All proposals for development on designated open space will be expected to:
 - (1) contribute to the objectives of the Council's Parks and Greenspaces Strategy
 - (2) be informed by engagement with open space users, local residents and Friends of Park groups where appropriate
 - (3) be appropriate in scale and relate positively to the character and value (historic, recreational or functionality) of the land
 - (4) have no adverse impacts on the environmental value and function of the open space.
 - (5) increase access to the space where possible, particularly through green corridors

Provision of new Open Space

- E. Major residential development will be expected to provide new functional and accessible open space or landscaped areas on-site in line with the recommended provision standards in Haringey's Open Space and Biodiversity Study (2013) of 1.64 hectares per 1,000 residents based on the GLA's Population Yield Calculator. Where this is in an area identified as being deficient in access to open space, the new open space should be publicly accessible.

- F. Where it is demonstrated that a new development cannot provide useable open space (or publicly accessible open space in areas of deficiency) or the quantity proposed is insufficient for the size of the development, financial contributions in lieu will be required for the enhancement of nearby open space in accordance with priorities set out in the Council's Parks and Greenspaces Strategy.

Recreation

- G. New indoor sports and recreation facilities should be prioritised on brownfield land and will only be considered appropriate on designated open space where it is demonstrated there are no appropriate alternatives.
- H. The provision of small pocket parks, functional amenity space including SUDs, play space and recreational facilities will be supported within new developments.
- I. The provision of water fountains, children's paddling pools and cooling facilities will be supported.

Supporting Text

Protection and Reconfiguration of Open Space

- 24.33 Access to high quality open spaces and opportunities for sport and recreation are highlighted as an important aspect of healthy communities in the NPPF, and development should deliver a high standard of amenity for existing and future users.
- 24.34 Additional population will be accommodated through the promotion of more compact urban development on existing brownfield land. This, however, should not lead to a reduction in amenity and places greater priority on the need to protect and maintain a well-distributed, well-connected and accessible supply of open space. For this reason, open space does not fall within the NPPF definition of 'brownfield / previously-developed sites'.
- 24.35 To promote healthy communities, open space provision must be high quality and usable to provide space for leisure and relaxation. This is important in areas where there are identified deficiencies in access to open spaces. Research has shown that parks are valuable for social interaction and people with access to quality open space are often physically and psychologically healthier. In addition to the inherent benefits of open space, development can contribute to the provision of a variety of sports, leisure and physical activity facilities for residents to address health and wellbeing priorities and deficiencies in the borough.
- 24.36 The NPPF states that existing open space, sport and recreation facilities should not be built on unless clearly surplus to requirements, or where the loss would be

replaced by equivalent or better provision in terms of quantity and quality, or where the need for and benefits of the development clearly outweigh the loss.

- 24.37 Haringey's Open Space and Biodiversity Study (2013) shows that there is a significant quantitative shortfall in accessible open space to meet the needs of the Borough's population, and for this reason Policy G3 establishes a presumption against any net loss of open space.
- 24.38 The reconfiguration of existing buildings and structures on open space can be an effective approach to enhance capacity, quality or accessibility of the land and address deficiencies. The Council will therefore give consideration to proposals that provide demonstrable improvements in the functional value, accessibility to and public use of open space through its reconfiguration. Proposals will need to be shown to form part of a deliverable, comprehensive development scheme where open space requirements have been positively considered.
- 24.39 Ancillary facilities can positively contribute to the value of green and open spaces, enhancing the potential for public use and enjoyment of those spaces, particularly where they support social and community infrastructure that meets local need. Insensitive design and siting of facilities can detract from the character of open space, adversely impact on the environmental functions it performs and place limitations on the range of uses possible on open space. The Council will therefore seek to ensure that any proposals for ancillary facilities are appropriate to their location, having regard to the Haringey Character Study (2022).
- 24.40 Open spaces are also important in addressing climate change and contributing to air quality improvements in heavily urbanised areas, and the numerous benefits that open spaces provide to communities must be protected from increased urbanisation. Any proposals within open space should therefore be ancillary to the open space use and respect its setting and visual appearance.

Provision of Open Space

- 24.41 Haringey's Open Space and Biodiversity Study (2013) provides an assessment of the quantity, quality and value of the open space and SINC's in the Borough. An updated SINC study was undertaken in 2023. It provides evidence to support the above policy and includes locally derived standards for the provision of open space in the Borough. These standards form the basis for redressing the quantitative and qualitative deficiencies through the planning process.
- 24.42 Haringey is a densely populated London borough. The population density varies considerably throughout the borough, with the most densely populated areas being located through the centre and east of the borough. The east-west differences within Haringey become even more apparent when considering deprivation. The whole of the eastern part of the borough falls within the 40% most deprived areas of the country, with the majority within the 20% most deprived.

- 24.43 Taking into account individual domains with the indices of multiple deprivation, notably social and private housing in poor condition and air quality the importance of access to good quality open space becomes even greater. This is because if air quality is poor, open space can act as a buffer against road derived air pollution, providing much needed ‘breathing spaces’ to absorb air pollution. Therefore, increasing the amount of open space and access to it in these areas is important to address these social and environmental impacts.
- 24.44 Local open spaces are also integral to the Borough’s environmental well-being. They support habitats and biodiversity, help mitigate air, light and noise pollution, counter the urban heat island effect and provide visual relief in the landscape. Open spaces are also hugely important in flood risk and drainage management.

Policy G4: Urban Greening

Urban Greening Factor

- A. All development proposals should integrate green infrastructure and provide for urban greening. Green infrastructure should be considered at an early stage of the design process and be incorporated as part of an integrated design approach.
- B. Major development proposals are required to conduct an Urban Greening Factor (UGF) assessment in accordance with the methodology set out in the London Plan and achieve an UGF of a minimum of 0.4 where the development is predominantly residential and a minimum of 0.3 where the development is predominantly commercial.
- C. All other developments are required to include urban greening elements, although no UGF calculation has to be submitted. Applicants will be required to provide the following information:
 - (1) appropriate information which provides sufficient detail on the type(s) of green infrastructure proposed;
 - (2) justification indicating why the type(s) of green infrastructure have been proposed for the development;
 - (3) appropriate information on how the urban greening elements will be maintained and managed over the lifetime of the development.
- D. Any new urban greening element should be locally appropriate and focus on tackling the climate emergency and/or help avoid or mitigate the impacts of the proposed development on biodiversity by providing greening that complements the site's existing wildlife value and that will achieve an overall gain in biodiversity.
- E. Management of green spaces and assets, including living roofs and walls, must be secured to ensure that they can be maintained to fulfil their function for the expected life of the development.
- F. Roof loading must be able to support the weight of living roofs plus other equipment such as solar and heat pumps. The Council supports biodiverse living roofs which are substrate-based and plug planted and seeded with wildflowers. Sedum blanket roofs are not supported as they do not offer biodiversity benefits.
- G. Where it has been demonstrated that best efforts have been undertaken to meet the UGF but it is unfeasible to be met on site, off-site contributions to local greening initiatives including pocket parks will be sought.

Supporting Text

- 24.46 London Plan Policy G5 requires all major developments to include urban greening as a fundamental element of site and building design. The policy requires the use of an Urban Greening Factor (UGF) to evaluate the quantity and quality of urban greening provided by a development proposal. The Mayor of London's UGF calculator should be used alongside the Mayor's UGF Guidance document in establishing the appropriate mix and amount of greening to be achieved on a site.
- 24.47 Urban greening covers a wide range of options including, but not limited to, street trees, living roofs, living walls, and rain gardens. It can help to meet other policy requirements and provide a range of benefits including amenity space, enhanced biodiversity, addressing the urban heat island effect, sustainable drainage and amenity.
- 24.48 Urban greening can also make important contributions to addressing deficiencies in open space, helping to improve social and environmental outcomes for people living in these areas.
- 24.49 Examples of how an urban greening scheme could demonstrate that it is locally appropriate include, but are not limited to:
- Providing green routes that promote active travel where current opportunities are limited;
 - Delivering a SUDS scheme which reduces surface water run-off where there are particular issues of surface water drainage or flooding;
 - Taking design cues from local habitat types or the Local Nature Recovery Plan or Biodiversity Action Plan
 - Delivering publicly accessible open space to reduce local deficiencies; or
 - Providing other types of accessible greening where a reduction in deficiency in access to public open space cannot be achieved.
- 24.50 The GLA's London Plan Guidance on Urban Greening Factor should be used to guide the achievement and calculation of the required UGF, with those surface cover types that contribute to other Local Plan policy objectives such as Biodiversity Net Gain prioritised. Haringey's Biodiversity Action Plan can assist in identifying priority typologies of green cover.
- 24.51 Where protected species or priority habitats or species are found on a development site, a priority for any new urban greening should be to help avoid or mitigate the impacts of the proposed development on these as well as to provide locally relevant greening that complements the site's existing wildlife value and will achieve an overall gain in biodiversity.
- 24.52 Living roofs as defined by the GLA to include green roofs, roof terraces and roof gardens. There are two main types of living roof:

1. Intensive: often referred to as ‘roof gardens’, with lush vegetation and deep substrate that are often accessible for recreational use.
2. Extensive: lower maintenance with shallower substrate with good potential to accommodate biodiversity gains.

24.53 Biodiverse living roofs (sometimes referred to as ‘brown roofs’) are extensive roofs which are designed to improve biodiversity by providing habitats and diversity of plant species. Seeds and plants are introduced into the substrate at the time of construction, rather than left to self-vegetate from windblown and bird lime seed dispersal.

24.54 The Council expects biodiverse living roofs should have a minimum substrate depth of 150mm, include features for fauna and not require irrigation long-term (temporary irrigation provided after installation is appropriate). The Council discourages use of high carbon content soil substrate and growing mats and sedum. A suitably qualified ecologist should witness and sign-off completion of installed biodiverse roofs to confirm compliance with the design.

24.55 The Council supports the use of living walls as another way to improve the urban greening factor of development proposals. Living walls (sometimes referred to as ‘vertical greening’) can improve urban cooling through shading and evapotranspiration, as well as contributing to biodiversity net gain. Proposals for living walls must ensure that regulations regarding fire safety of building facades and safe access for maintenance are adhered to, and should follow best practice guidance, such as Biotecture’s External Cladding: Living Walls and Fire Safety Best Practice Guide (2022).

24.56 Offsite contributions will be based on delivering the required proportion of the factor requirement that is missing using the GLA Urban Greening Factor Calculator. The cost of provision will be based on the proportionate cost of delivering, implementing and maintaining the surface cover that could theoretically be achieved on site to meet the full UGF over a period of 30 years. The Council will then deliver this urban greening in open spaces, streets or parks within 400 metres of the development site to deliver priorities in the Council’s Biodiversity Action Plan and the London Local Nature Recovery Plan.

Policy G5: Biodiversity and Biodiversity Net Gain

Protection of Biodiversity and Designated Sites

- A. The Council will protect and enhance the borough's biodiversity. This includes sites designated for their biodiversity and nature conservation value as well as undesignated sites with value.
- B. Proposals must enhance and not adversely affect (either directly or indirectly) any land or area within Sites of Importance for Nature Conservation (SINC), Ecological Corridors, Local Nature Reserves, Sites of Special Scientific Interest (SSSI), Special Areas of Conservation, Special Protected Areas, and Ramsar sites.
- C. Proposals should support the delivery of the London Local Nature Recovery Strategy and the Haringey Biodiversity Action Plan, protecting and conserving priority species and habitats including where these sit outside the nature conservation network of designated sites. Provision should explore projects that contribute to priorities in Haringey's Biodiversity Action Plan and the emerging London Local Nature Recovery Strategy, or to improve nearby SINCs or Local Nature Reserves where possible.
- D. Proposals should protect existing valuable ecological features of the development site or those adjacent to it. Proposals that would result in loss, reduction in area or significant harm to the nature conservation or biodiversity value of a site or land adjacent to it will be refused unless adequate mitigation or compensatory measures of equivalent or better biodiversity value are included. Compensation will only be permitted after the London Plan's mitigation hierarchy set out in London Plan Policy G6 has been exhausted.
- E. Protection of biodiversity must be appropriately demonstrated via an ecological assessment prepared by a suitably qualified person.

Biodiversity Net Gain

- F. Development proposals should deliver robust and measurable net gains for biodiversity by incorporating and/or creating new habitats or biodiversity features, such as expansion and improvement of habitats, green and blue links or habitat restoration, incorporation of green roofs and walls, tree planting as well as micro-habitat features such as bird (with a priority for swifts) and bat bricks and boxes, hedgehog gates or wildlife ponds.
- G. For schemes which are subject to statutory biodiversity net gain (BNG) requirements, applicants must submit a BNG Plan setting out how a minimum

of 10% net gain in biodiversity value will be achieved in line with the latest available version of the Natural England BNG Metric.

- H. On-site biodiversity net gain must be prioritised with on-site gains suitably integrated with existing nearby wildlife habitats and features
- I. Off site delivery will only be supported where there is no possibility of on-site gains being achieved, or where off site gains can be delivered within Haringey on sites designated for their biodiversity and nature conservation value or otherwise identified by the council as appropriate for biodiversity gain.
- J. Applicants must submit a Habitat Management and Monitoring Plan setting out how gains will be secured for a minimum of 30 years. The Council will require developers to pay a biodiversity net gain monitoring contribution to fund statutory monitoring of the proposed gain.

Supporting Text

- 24.58 The aim of this policy is to protect and enhance the borough's biodiversity. This includes biodiversity in, and adjacent to, the borough's designated sites as well as other non-designated existing habitats and features of biodiversity value. It seeks to ensure that nature conservation is fully considered as part of the site selection, design and development process.
- 24.59 There are various designated nature conservation sites located within the borough including Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation and Ecological Corridors. These are provided various levels of protection under the London Plan and legislation including Wildlife and Countryside Act 1991 and National Parks and Access to the Countryside Act 1949. Whilst no internationally designated sites are located within the Borough, there are several within a 10km radius of its boundary and therefore merit consideration in relation to development proposals.
- 24.60 Epping Forest is a designated Site of Special Scientific Interest, and a portion is designated as a Special Area of Conservation (SAC). The Epping Forest SAC lies within Epping Forest District Council, the London Borough of Waltham Forest and the London Borough of Redbridge administrative areas. SACs are internationally important areas given special protection under the EU's Habitats Directive (92/43/EEC) which is transposed into UK law by the Conservation and Habitats of Species Regulations 2017 as amended (known as the Habitats Regulations). New residential developments can result in an increase in the number of visitors to Epping Forest impacting upon the SAC. New residential developments within a 6.2km recreational 'Zone of Influence' may therefore be required to contribute financial planning obligations for Strategic Access Management Measures (SAMMs) and Suitable Alternative Natural Greenspaces (SANGs) to mitigate the harmful impacts by visitors to Epping Forest SAC.

24.61 Ecological assessments required in support of applications should detail the habitat(s) (type and size) and species present currently on site, alongside data on the proposed size and type of open space and ‘living building’ features which should be shared with the Council and Greenspace Information for Greater London (GIGL).

24.62 London Plan Policy G6 gives effect to the London wide Biodiversity Action Plan and seeks to ensure that boroughs and other stakeholders take a proactive approach to the protection, enhancement and management of biodiversity including seeking a net gain in biodiversity. The Environment Act 2021 makes this mandatory in new development, and so this Policy expands on how this can be achieved at a local level. Biodiversity Net Gain (BNG) is an approach to development which leaves biodiversity in a measurably better state than before the development occurred. BNG should be considered from the site selection stage through to the final design. Following completion of the development the habitat delivery will need to be managed for 30 years.

24.63 BNG measurements should be calculated using Natural England’s BNG metric to establish the nature of the harm to biodiversity and the quality of the new green benefits arising from development.

24.64 The BNG Plan should include:

- A statement outlining how the proposed development is intending to achieve BNG, and where and how this will be done.
- How the Mitigation Hierarchy and Biodiversity Gain Hierarchy has been followed.
- How the Biodiversity Metric Principles and Good Practice Principles are being adhered to.
- Consideration of whether the proposals for on-site habitat creation or enhancement are appropriate and feasible, taking into account how the site will be used.
- Evidence such as soil sampling, should be included to support any delivery of habitats with a distinctiveness score of high or above.
- The provision of sufficient information to support the allocation of habitat type and condition score for both baseline habitats and any proposed habitat enhancement or creation.
- Baseline and proposed post-development plan.
- Brief statement of how strategic significance has been applied.
- A statement to support the document has been prepared by a professional ecologist with suitable qualifications and experience and be in accordance with the British Standard BS8683 ‘Process for designing and implementing biodiversity net gain: specification’.

- 24.65 Applicants should provide supporting Geographical Information System (GIS) files of both the baseline map and post-intervention (development proposals) map. The GIS files must be correctly georeferenced, and in a format that holds all relevant data.
- 24.66 The provision of compensation to address residual biodiversity impacts will not be permitted unless the steps of the mitigation hierarchy (enhance, avoid or minimise, restore, compensate, and offset habitat loss) set out in the London Plan have been followed and all opportunities to avoid and then minimise negative impacts have been pursued.

Policy G6: Trees

- A. Proposals should protect, maintain and enhance Haringey's urban forest comprising trees and woodlands, as well as shrubs, hedgerows and other vegetation of significance.
- B. New development should accommodate as many new high-quality trees as possible and, where appropriate, new streets should be tree-lined in accordance with the NPPF. New trees should be of a suitable species for the location, generally be native, and accord with recommendations in the Council's Biodiversity Action Plan and Parks and Greenspaces Strategy.
- C. To minimise impacts on existing trees, hedges, shrubs and other significant vegetation, both on site and on adjoining land, all developments with potential to impact these should consider such issues from the earliest stage of development design and be informed by an arboricultural study by a suitably qualified professional.
- D. The Council will generally resist the loss of trees within proposals and will particularly resist the loss of significant existing trees, including:
 - (1) Those designated with Tree Preservation Orders (TPOs)
 - (2) Those which contribute to the heritage significance of Conservation Areas
 - (3) Those with high and moderate amenity value and those which have scope for screening other properties/features
 - (4) Veteran, ancient, and notable trees
 - (5) Those with high potential for carbon dioxide capture
- E. Development proposals, including extensions and outbuildings, will only be supported where they:
 - (1) Retain significant existing trees
 - (2) Retain as many other trees as possible and, where practicable, provide an appropriate replacement for any tree that is felled or where this is not possible provide a compensatory financial contribution for the provision for off-site green infrastructure in line with the monetary value of the trees to be felled to be calculated in accordance with the 'Capital Asset Value for Amenity Trees' (CAVAT);
 - (3) Would not give rise to any threat, immediate or long term, to the continued well-being of significant existing trees and any other trees that would be retained
 - (4) Positively integrate retained trees as part of well-considered, sustainable soft landscaping
 - (5) Demonstrate that retained trees can be robustly protected from construction impacts and site works, in accordance with BS 5837: 2012 (Trees in Relation to Design, Demolition and Construction to Construction – Recommendations).

- (6) Are constructed in accordance with the recommendations set out in NHBC Standards - Building near trees, to ensure against future root damage from existing trees.
 - (7) Maximise new tree-planting as part of development with an appropriate commitment to implement.
- F. Only where clear, justifiable and compelling evidence is provided to justify their loss, significant existing trees may be removed. In these instances, development proposals will be required to:
- (1) Deliver a net increase in the amenity and canopy cover to help meet the Borough's target of 30% increase in cover, habitat and environmental services provided by trees on the site including through the planting of significant mature trees within the proposed scheme; or
 - (2) Where an increase cannot be secured on site, the full Capital Asset Value for Amenity Trees (CAVAT) value of any trees lost should be calculated and an appropriate mitigating financial contribution paid to the Council which will be redirected towards local green infrastructure provision.

Supporting Text

- 24.68 The abundance of trees and woodland in Haringey is a great asset for the borough and has significant benefits for biodiversity, heath mitigation, air quality and urban greening. It is essential therefore that new development should protect, maintain and enhance this urban forest, as well as shrubs, hedgerows and other vegetation of significance
- 24.69 The Council has set a strategic target in its Tree and Woodland Plan (2023) of planting at least 10,000 new trees by 2030 including achieving a minimum of 30% canopy cover across all Council wards. New development in Haringey will be required to contribute to this and should maximise opportunities for new trees.
- 24.70 Tree planting should be recognised from the outset as an integral part of any development scheme and should be purposefully designed to complement the proposed features of the development, and those existing features intended for retention.
- 24.71 Where trees are located within a development site, the appropriate arboricultural information should be obtained and applied to demonstrate that layouts have been informed by the use of such survey and tree constraints mapping information. NHBC Standards 4.2 - Building near trees, gives guidance on avoiding damage.
- 24.72 Planting should be in a co-ordinated way that maximises the green infrastructure network, wherever possible. Such an approach aligns with London Plan policies G1 – Green Infrastructure and G5 – Urban Greening.

Policy G7: Food Growing

- A. The provision of community food growing sites will be supported as part of new development and as a meanwhile use on vacant or under-utilised sites which are proposed for future development.
- B. Proposals for residential development will be expected to include measures that increase or promote food production. This includes growing spaces such as roof gardens, allotments and community orchards.
- C. New food growing spaces should be accessible to everyone and integrated with other supporting services (e.g. water supply and irrigation, storage of equipment and composting), where possible. Such spaces should also have no detrimental impact on the character, appearance, amenity and security of the surrounding area.
- D. Existing allotments will be safeguarded from new development. Proposals that would involve the loss of allotments will be refused unless replacement allotment space of the same size and quality is re-provided within walking distance.

Supporting Text

- 24.73 Community food growing sites deliver multiple physical and mental wellbeing benefits to residents including the production of healthy, fresh food, greater exposure to natural environments and wildlife physical activity and social connections.
- 24.74 Haringey currently has 27 allotment sites but these are at capacity and have long waiting lists. The Council will support new community food growing opportunities as part of new development and encourages imaginative approaches to provision, subject to technical and practical considerations.
- 24.75 Provision within new development could take the form of dedicated food growing areas as well as within communal planting schemes, such as fruiting trees, shrubs and bushes. Where sites are constrained or tightly defined, developments should utilise rooftops, walls, atriums, courtyards or balconies as growing spaces and innovative solutions, where possible. The use of edible plants could also be considered as part of the landscaping of new developments, rather than the use of ornamental trees and shrubs.
- 24.76 Growing spaces should ideally be south facing and with adequate protection planned (e.g., from exposure to strong winds particularly on balconies and roof terraces) into any growing space to allow crops to thrive. Soil in urban settings may need to be checked for contamination and quality. Any site must be made safe for its existing use. Management and maintenance arrangements must be in place and consideration given to whether on-going management of the growing areas by a caretaker or external contractor will be required.

Policy G8: Watercourses

- A. Proposals adjacent to watercourses or over culverted watercourses must contribute to the restoration and enhancement of the borough's Blue Ribbon Network, including Pymmes Brook, Moselle Brook, Stonebridge Brook, the River Lee and its tributaries. To achieve this, development will be required to:
- (1) Avoid the net loss or covering of watercourses
 - (2) Avoid adversely affecting natural functioning of watercourses
 - (3) Avoid the deterioration of water quality of watercourses
 - (4) Incorporate suitable setbacks to provide an adequate undeveloped buffer zone around watercourses, typically 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as otherwise agreed by the Council and the Environment Agency
 - (5) Maximise opportunities to reduce fluvial flood risk and strengthen climate resilience
 - (6) Where appropriate, secure ecological and biodiversity enhancements to open sections of watercourses
 - (7) Robustly investigate opportunities to re-open culverted sections of watercourses supported by site-specific assessments of technical potential and financial viability and in consultation with key stakeholders such as the Environment Agency and Haringey Rivers Forum
 - (8) Where appropriate, restore culverted sections of watercourses to improve water quality, provide natural urban cooling, improve the amenity of waterways and reduce flood risk, in line with the London River Action Plan
 - (9) Where appropriate, be supported by evidence to demonstrate how watercourse infrastructure will adequately function for the lifetime of the development, and if necessary, make provision for repairs, improvements or replacements.
 - (10) Demonstrate how the objectives of the Thames River Basin Management Plan and London River Restoration Action Plan have been taken into account.

Supporting text

- 24.77 The term watercourse applies to both main rivers and ordinary watercourses. Main rivers are all watercourses shown on the statutory main river maps held by the Environment Agency and the Department of Environment, Food and Rural Affairs. Ordinary watercourses are all other watercourses.
- 24.78 Watercourses in Haringey form part of the network of rivers and streams within the London basin. They are an important resource that offer amenity, support biodiversity and play a critical role in sustainable flood management (such as by reducing the speed of water run-off and providing capacity for flood storage).
- 24.79 New development needs to be set back from watercourses and flood defences in order to provide an appropriate buffer zone to ensure the natural functioning of

watercourses. Buffer zones offer many benefits including for flood resilience and biodiversity. Adequate space is also needed to allow for access and maintenance of flood defences. Buffer zones should be left free of any permanent structures and carefully integrated with new developments so as to maximise their amenity value.

- 24.80 Haringey lies in the Lower Lee River catchment and the River Lee has historically suffered from poor water quality. Further, the River Lee, Pymmes Brook and Moselle Brook are currently classified as having ‘moderate’ ecological status and steps are needed to enable them to reach ‘good’ status.
- 24.81 The improvement of waterbodies to ‘good’ ecological status or potential, and not allowing any deterioration in the status of waterbodies, are key requirements of the Water Framework Directive. This policy is set in the context of the Directive and will ensure that new development supports its objectives.
- 24.82 Many watercourses have been significantly altered from their original state thus compromising these key functions. This is owing to a legacy of urban development in which watercourses were redirected away from sites or piped into culverted sections below ground. The Council aims to stop this practice of culverting and reverse such unsustainable alterations by requiring proposals for site redevelopment to fully exploit opportunities to restore and enhance the natural functioning of watercourses (a practice often referred to as ‘deculverting’, or ‘daylighting’). This approach aligns with the Blue Ribbon Network objectives of the London Plan and with Environmental Agency advice. The Council will extend these policy principles to all watercourses in Haringey.
- 24.83 Sites with existing culverts will be expected to robustly investigate opportunities to re-open culverted sections of watercourses supported by site-specific assessments of technical potential and financial viability and in consultation with key stakeholders such as the Environment Agency and Haringey Rivers Forum. Where the implementation of measures to restore sections of the watercourse is not considered possible, clear and robust justification must be provided. There are opportunities for deculverting in various parts of the borough, in particular the Moselle Brook and Stonebridge Brook which are both heavily modified waterbodies and largely in culvert.
- 24.84 The Thames Basin River Management Plan aims to prevent the deterioration and improve the quality of London’s waterways. The plan’s objectives and actions for watercourses in Haringey should be considered for all new proposals where relevant. In addition, the River Restoration Action Plan sets out details on local opportunities to restore sections of the River Lee. It is updated regularly and applicants should refer to the Action Plan accordingly.

25. Housing

Introduction

- 25.01 The Council considers that the right to a home is a fundamental human right. A good quality, secure home allows people to put down roots in a community. It gives children a safe place to play and learn. Good housing contributes to good health, both physical and mental. It helps with access to local jobs. And well-designed homes create pleasant, secure neighbourhoods that allow residents to belong and thrive.
- 25.02 The Council wants everyone in Haringey, whatever their circumstances, to have a safe, stable, and genuinely affordable home. It is recognised that this far from being the case at present and that significant work is needed to address this. There is a housing crisis in Haringey as there is across London, and the UK and tackling it will be a major challenge.
- 25.03 The Council's Housing Strategy 2024-2029 contains four strategic objectives to help address identified housing challenges, the first of which is delivering the new homes Haringey needs.
- 25.04 As part of delivering sustainable development, the National Planning Policy Framework requires Local Plans to meet the development needs of their area for new homes. In London, the need for new homes is assessed on a capital wide basis by the Mayor of London and then minimum housing targets are apportioned to boroughs via the London Plan based upon potential future housing capacity (e.g. availability of sites). The London Plan 2021 sets Haringey a ten year housing target of 15,920 homes which equates to 1,592 homes per year.
- 25.05 Through the Council's New Local Plan, we aim to ensure that this target is met and where possible exceeded. To support this, the Council will deliver at least 3,000 of those homes ourselves as Council homes – nearly 20% of the overall target. We have an ambitious home-building programme that is delivering the first new council homes in a generation, with as many as possible built on existing council-owned land. This is an important priority for our borough, as for many of those in the greatest need, a council home offers their only real chance to put down roots in Haringey.
- 25.06 To meet our community's diverse needs, we need many new homes but we also need to ensure that these are good quality, healthy and comfortable, and that as many as possible are genuinely affordable for our communities.
- 25.07 This Draft Local Plan contains policies to ensure that:
- the housing requirement for Haringey is clearly established over the plan period

- a sufficient amount and variety of land can come forward to meet the need for new homes, including small and medium sized sites
- an appropriate mix of housing is provided for the local community, with the size, type and tenure of housing need clearly reflected, including providing for genuinely affordable homes to meet identified local needs
- the needs of groups with specific housing requirements are addressed

Policy H1: Meeting Housing Needs

- A. The Council will work positively with stakeholders and partners to make full use of Haringey's capacity for housing and will seek to significantly increase the supply of new homes in the borough to meet evidenced local housing needs.

- B. The Council will meet the minimum housing target for Haringey set in the London Plan 2021 by delivering at least 15,920 homes (net) over the period 2027 to 2036. This will be achieved through:
 - (1) optimising potential housing delivery on all suitable and available brownfield sites
 - (2) realisation of the borough-wide spatial strategy set out in Policy SS1
 - (3) development of allocated residential and mixed-use sites as set out on the Policies Map
 - (4) encouraging development on appropriate windfall sites
 - (5) supporting the delivery of well-designed new homes on small sites
 - (6) resisting proposals for the development of alternative uses on allocated residential and mixed-use sites unless it can be demonstrated that there is an overriding public benefit
 - (7) maintaining a five year housing land supply with appropriate buffer

- C. The focus of delivery will be on providing the right mix of homes to meet the diverse needs of Haringey's communities. This will be achieved through:
 - (1) ensuring that all homes and residential accommodation are of a high-quality design that promotes health and wellbeing consistent with Policy D11.
 - (2) maximising the delivery of new affordable homes which are genuinely affordable to most people in housing need, including essential local workers, in accordance with Policy H2.
 - (3) delivery of an appropriate mix of housing sizes and types, with priority for homes suitable for families, in accordance with Policy H3
 - (4) supporting Build to Rent development, consistent with Policy H4
 - (5) supporting proposals for new homes on small sites in accordance with Policy H5
 - (6) supporting proposals for self-build, custom-build and community-led housing in accordance with Policy H6
 - (7) encouraging housing proposals for older and vulnerable people which meet an identified local need in accordance with Policy H7
 - (8) supporting self-contained residential homes over other forms of residential uses. Self-contained residential homes (use class C3) are the priority need in Haringey and, in accordance with policies H8 and H9, proposals for large-scale purpose-built shared living and purpose-built student accommodation will only be permitted in limited circumstances.
 - (9) supporting proposals for gypsy and traveller accommodation in accordance with Policy H10

- D. To ensure the borough's existing stock of homes continues to meet the needs of Haringey's communities, the Council:
- (1) resist proposals which involve a net loss of self-contained homes in accordance with Policy H11
 - (2) restrict the conversion of existing family sized homes to smaller units or to houses in multiple occupation in accordance with Policy H12
 - (3) resist proposals for the change of residential accommodation to short-term lets
 - (4) otherwise resist proposals involving the loss of accommodation that meets an identified housing need

25.08 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Significantly boosting the supply of new homes in the borough with a focus on providing as many genuinely affordable homes as possible will contribute to reducing housing inequalities in the borough which have a clear link to systemic inequality

A HEALTHY & SAFE PLACE

Supports an increase in the supply of good-quality, healthy and comfortable homes for residents and communities, including for those in greatest need as part of the Council's ambitious home-building programme that is delivering the first new council homes in a generation

A SUSTAINABLE & RESILIENT PLACE

Supports a more sustainable built environment with employment buildings that are modern, energy efficient and fit for future needs and requirements

25.09 Haringey faces a significant and growing housing challenge, driven by population growth and affordability pressures. The Haringey Housing Strategy 2024–2029 sets out a clear vision for ensuring that everyone in the borough has access to a safe, stable, and genuinely affordable home. This Local Plan policy supports that vision by setting out a comprehensive policy framework to meet housing needs through increased supply, improved quality, and a better match between housing types and community needs.

25.10 The borough's population is projected to grow substantially in the future. To meet this demand, the Council is committed to delivering the minimum housing target of 15,920 homes over the period 2027-2036. The Housing Strategy recognises the acute shortage of affordable and family-sized homes and commits to supporting the

delivery of 1,592 new homes per year, including 3,000 new council homes by 2031. This policy supports that ambition by promoting development on brownfield land, allocated sites, and appropriate windfall and small sites, while resisting the loss of residential capacity.

25.11 The Housing Strategy identifies a critical need for a diverse mix of homes, including:

- Larger family homes.
- Supported and specialist housing for older people, disabled residents, and those with complex needs.
- Genuinely affordable homes, with a strong preference for social rent and London Living Rent

25.12 This policy ensures that new development reflects these priorities, supporting a balanced housing market that meets the needs of all residents, including essential workers, families, and vulnerable groups.

25.13 The Housing Strategy emphasises the importance of high-quality, sustainable homes that promote health and wellbeing. All new homes should meet or exceed the Mayor of London's Housing Design Standards, be net-zero carbon, and incorporate inclusive design principles. The Council's own housing delivery programme is leading by example, with all new council homes designed to Passivhaus or equivalent standards, and 20% of new homes being wheelchair adaptable.

25.14 With around 14,000 households on the housing register and more than 2,600 in temporary accommodation, it is vital that the borough's existing housing stock is protected and used efficiently. The Housing Strategy highlights the need to prevent the loss of self-contained homes, resist conversions that reduce family housing, and tackle the misuse of homes as short-term lets. This policy supports those aims by ensuring that existing homes continue to meet the needs of Haringey's diverse communities.

Policy H2: Genuinely Affordable Housing`

- A. The Council will aim to secure 50% of all new homes over the plan period as genuinely affordable consistent with the Mayor's of London's strategic target in the London Plan. To achieve this the Council will:
 - (1) deliver its extensive Council Housing Delivery Programme
 - (2) work actively with Registered Providers of Social Housing to facilitate their delivery of affordable housing
 - (3) maximise the delivery of genuinely affordable housing in all private housing developments, subject to viability, including in Build for Sale, Build for Rent, other developments comprising self-contained units with Use Class C3, purpose-built student accommodation and large-scale purpose-build shared living.
- B. Proposals for 10 or more self-contained homes (gross) will be required to deliver a minimum of 40% affordable housing on-site, except on types of land for which the London Plan sets a higher target (e.g. public sector land and industrial land).
- C. Off-site affordable housing or payments in-lieu will only be acceptable in truly exceptional circumstances where the Council is satisfied that this form of provision would secure a better outcome in meeting the borough's housing need.
- D. The Council will require an affordable housing tenure split of 70% low cost rent housing and 30% intermediate housing.
- E. Low cost rent is defined as homes rented based on social rent levels, including Social Rent and London Affordable Rent. To ensure new affordable homes are genuinely affordable to most people in affordable housing need, the majority of intermediate homes should be homes for rent at London Living Rent levels. Other intermediate affordable housing tenures will be permitted where it can be demonstrated that these are genuinely affordable. Affordable housing tenures which are not considered to be genuinely affordable will be resisted and not be counted towards the level of affordable housing provision on individual schemes. Where developments propose more than 50% affordable housing, some flexibility may be considered in the tenure mix provided the proposed tenures are demonstrated to be genuinely affordable.
- F. The percentage of affordable housing on a scheme should be measured in habitable rooms to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes to ensure compliance with the Council's preferred size mix set out in Policy HX.

- G. Proposals that meet or exceed the targets specified in part B and D of this Policy will not be required to provide viability evidence and will follow the Fast Track Route as set out in the London Plan. Only those proposals that cannot meet the relevant targets will be required to undertake the Viability Tested Route as set out in the London Plan including submitting site-specific viability information to the Council for its review. For schemes which undertake the Viability Tested Route, the targets set out in Parts B or D must remain the starting point. Site-specific viability assessments will be tested rigorously and the maximum viable amount of affordable housing must be delivered. Such proposals will be subject to detailed review mechanisms throughout the period up to full completion of the development, including a late stage review mechanism.
- H. Proposals for 5 to 9 self-contained homes (gross) will be required to provide a financial contribution to fund the development of affordable housing off-site.
- I. Where development sites are split, or separate proposals are brought forward on neighbouring or nearby sites which are physically or functionally linked, affordable housing requirements will be assessed on the total number of net housing units proposed across all related sites.
- J. Affordable housing requirements are not limited to use class C3 and will be sought from alternative housing products consistent with other policies in this plan.
- K. For proposals which trigger affordable housing requirements in Haringey (either on-site or through financial contributions), exceptional reasons will be required to justify application of the Vacant Building Credit and all of the following criteria must be met:
 - (1) All buildings within the site boundary must be vacant at the time the application is submitted and it should be demonstrated that the buildings have been vacant for 3 years or more
 - (2) There are no extant or recently expired permissions on the site, for any proposed use class.
 - (3) It is clearly demonstrated that the site would otherwise not come forward for any form of redevelopment and the building has not been made vacant for the sole purpose of redevelopment. This should be evidenced by provision of marketing evidence for a continuous period of 24 months (up to the point of submission of an application). Evidence should also be provided setting out any site specific issues which form a barrier to the redevelopment of the site.
- L. Development involving the provision of affordable housing will be required to ensure affordable housing is equivalent in siting, appearance and layout to the rest of the development and provides equivalent access to amenity and

play space. Proposals will be required to demonstrate that the integration of different tenures has been considered from the outset of the design process.

Supporting Text

25.15 As set out in the Haringey Housing Strategy, the Council wants everyone in Haringey, whatever their circumstances, to have a safe, stable, and genuinely affordable home.

25.16 The Council's Strategic Housing Market Assessment (SHMA) (2021) set out that the annualised need for affordable housing in Haringey significantly exceeds the Council's annual housing target of 1592 homes a year therefore even if all new homes delivered in the borough in the next 15 years were affordable homes there would still be a growing shortfall of affordable housing to meet need. The SHMA further identifies that over 80% of affordable housing need is for social rented homes. As such, it is the case that many affordable housing tenures are not genuinely affordable for our residents and communities. It is therefore critical that the Local Plan maximises the supply of genuinely affordable housing through the planning system with a focus on the affordable tenures which are most affordable. The Council is already having a major impact with the delivery of its ambitious council house building programme but private developments must also continue to meaningfully contribute to the delivery of genuinely affordable housing to meet need and ensure the borough continues to have mixed and balanced communities.

25.17 There are many types of affordable housing product which fall within the definition of affordable housing in the NPPF. The Council's preferred affordable housing tenures are:

- homes based on social rent levels, including Social Rent and London Affordable Rent
- London Living Rent

25.18 Definitions of preferred affordable housing tenures

Tenure	Category of Affordable Housing	Definition
Social Rent	Low-cost rent	Social Rent homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF. Social Rent is sometimes also known as Formula Rent, Target Rent, or Council Rent.

London Affordable Rent	Low-cost rent	London Affordable Rent (LAR) was introduced by the Mayor of London in 2016 for new affordable homes in London and is set at the Social Rent Cap increased every year by one percentage point more than inflation. LAR is for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator's Rent Standard Guidance. The rent levels are capped at benchmark levels published by the GLA and are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF.
London Living Rent	Intermediate	London Living Rent (LLR) offers Londoners on average incomes a lower rent, enabling them to save for a deposit. LLR is an intermediate affordable housing product with low rents that vary by ward across London. Where funded by the GLA, LLR will be a Rent to Buy product, with sub-market rents on time-limited tenancies, which will help households on average income levels to save for a deposit. As London Living Rent can be a step to homeownership, it can be considered as an affordable homeownership product

- 25.19 Other affordable housing products may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy definition of genuinely affordable housing and are considered by Haringey to be genuinely affordable. For the avoidance of doubt, homes set at 80% of the local market rent are not considered to be a low-cost rent home in Haringey.
- 25.20 The Haringey Housing Strategy commits the Council to preparing an Intermediate Housing Policy. Once adopted, applications should have regard to this in terms of proposed intermediate housing.
- 25.21 Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £67,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. Further information on the income caps and how they are applied can be found in the London Plan Annual Monitoring Reports.
- 25.22 For homes to be considered affordable, annual housing costs, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income, based on the household income limits set out above.

25.23 For proposals of 10 or more self-contained homes (gross), affordable housing should be provided on-site to help deliver mixed and inclusive communities. Affordable housing will only be accepted as an off-site contribution in exceptional circumstances where it can be robustly demonstrated high-quality affordable housing cannot be delivered on-site or

25.24 where an off-site contribution would:

- a) secure a higher level of affordable housing on an alternative site;
- b) better address priority needs, especially for affordable family housing; or
- c) secure a more mixed and inclusive community than an on-site contribution.

25.25 Justifiable cases where high-quality affordable housing cannot be delivered on-site could include where:

- no Registered Provider is identified and the Council is not willing to take the units on itself;
- the size of the site is too small; or
- practicalities of design and management mean this on-site delivery is not possible.

25.26 Cash in lieu contributions will be accepted in even more limited circumstances where off-site options have been explored but are not acceptable and where accepting a cash in lieu contribution will not be detrimental to the delivery of mixed and inclusive communities.

25.27 In each case, the approach must result in additional affordable homes, meaning the funding should not be used for affordable units that would otherwise have been delivered on-site. It should also take account of the fact that all sites are expected to deliver at least the threshold level of affordable housing and any cash in lieu or off-site contribution should deliver units in addition to this.

25.28 To avoid incentivising off-site provision or in lieu contributions, agreements for this may not provide any financial benefit to the applicant relative to on-site provision and should include review mechanisms in line with the Viability Tested Route.

25.29 In instances where it is accepted that off-site provision is appropriate, the onus will be upon the developer to find and acquire a more suitable site that would not otherwise be expected to come forward for affordable housing, within the vicinity of the originating development.

25.30 Where the Council agrees a cash in lieu of provision contribution may be suitable, the financial contribution sought will be in accordance with the Mayor of London's Affordable Housing and Viability Supplementary Planning Guidance. This states that all developments not meeting the affordable housing threshold should be assessed for financial viability through the assessment of an appropriate financial appraisal, with early and late-stage viability reviews applied where appropriate. It states that all

schemes which propose cash in lieu payments are required to provide a detailed viability assessment as part of the justification. The SPG states “The starting point for determining in-lieu contributions should be the maximum reasonable amount of affordable housing that could be provided on-site as assessed through the Viability Tested Route. The value of the in-lieu contribution should be based on the difference in Gross Development Value arising the affordable units are changed to market units within the appraisal. This is to ensure that where the on-site component of market housing is increased as a result of the affordable contribution being provided as a cash in-lieu payment, this does not result in a higher assumed profit level for the market homes within the assessment which would have the effect of reducing the affordable housing contribution”.

- 25.31 For proposals for 5 to 9 self-contained homes (gross), developers will be required to provide a financial contribution to fund the development of affordable housing off-site.
- 25.32 All proposals requiring provision for affordable housing or a linked financial contribution should have regard to the Mayor of London’s Affordable Housing and Viability Supplementary Planning Guidance and Development Viability London Plan Guidance.
- 25.33 This Draft Local Plan is informed by a preliminary viability assessment. A detailed Whole Plan Viability Assessment will be carried out in support of the next iteration of this Plan (Regulation 19). At the same time, a formula will be proposed for the contribution in lieu for schemes of 5-9 units.

Policy H3: Housing Mix

- A. The Council will support proposals which offer a range of housing sizes and types to meet local need, with priority for homes suitable for families.
- B. All proposals for conventional homes (including conversions and extensions) are expected to provide a mix of home sizes as set out below:

Housing Size Mix requirements				
Tenure	Studio/bedsit	1 Bed	2 bed	3+ bed
Social rent	None	Lower % than 2 bed	Higher % than 1 bed	At least 30%
Intermediate rent e.g. London Living Rent	None	Lower % than 2 bed	Higher % than 1 bed	At least 30%
Intermediate affordable home ownership e.g. shared ownership	None	Higher % than 2 bed	Lower % than 1 bed	None
Market	None	Lower % than 2 bed	Higher % than 1 bed	At least 30%

- C. The Council will consider variations to the size mix if this can be justified based on the tenures and type of homes proposed, site location, area characteristics, the objective of optimising housing potential, design constraints, scheme viability and for intermediate affordable home ownership the ability of potential occupiers to afford the homes proposed.
- D. Concentrations of one-bedroom units, either overall and as part of constituent market and affordable elements of a proposal, will not be acceptable.
- E. Studio and bedsit units will only be permitted where:
- (1) these would constitute a very small proportion of the housing mix of a development proposal, both overall and/or in any constituent market or affordable elements
 - (2) the delivery of larger homes is not possible; and
 - (3) provision of studios/bedsits would result in a high-quality homes in accordance with relevant design policies.

Supporting Text

25.34 Delivering the right mix of housing is essential to meeting the diverse needs of Haringey's residents, supporting inclusive communities, and addressing housing inequalities. Policy H3 sets out the Council's approach to ensuring that new housing

developments provide a balanced mix of unit sizes and tenures, with a particular emphasis on family-sized homes and genuinely affordable housing.

- 25.35 This approach is supported by the London Plan (2021), which under Policy H10 (Housing Size Mix) requires boroughs to ensure that new housing developments provide a range of unit sizes informed by local evidence of need. The NPPF also requires local planning authorities to plan for the needs of different groups in the community, including families with children, older people, and people with disabilities (paragraph 63).
- 25.36 The Council supports proposals that provide a range of housing sizes and types to reflect the borough's demographic profile and housing needs. The Haringey SHMA (2021) and Housing Strategy (2024–2029) both highlight a significant shortfall in larger family homes, particularly affordable homes. Overcrowding is a persistent issue, with 23% of Council tenant households living in homes smaller than their basic needs, and 35% of households in Bands A and B on the housing register requiring three or more bedrooms.
- 25.37 The Housing Strategy commits to prioritising the delivery of larger homes to address this need, particularly for social rent and London Living Rent tenures. Policy H3 reflects this priority by requiring that at least 30% of homes in each tenure category are three-bedroom or larger.
- 25.38 The required housing size mix is informed by the SHMA and Housing Strategy and is designed to ensure that new developments contribute to a balanced housing stock. The mix varies by tenure to reflect differences in affordability, demand, and household composition:
- For social rent and intermediate rent (e.g. London Living Rent), the emphasis is on two- and three-bedroom homes, with a minimum of 30% of homes being family-sized (3+ bedrooms).
 - For intermediate home ownership (e.g. shared ownership), the focus is on smaller units, reflecting affordability constraints and the limited number of households in need who can afford larger shared ownership homes.
 - For market housing, a similar emphasis on two- and three-bedroom homes is required, with at least 30% of homes being family-sized to support mixed and inclusive communities.

This approach aligns with London Plan Policy H10 and has been drawn up to reflect local evidence of need, and the role of different unit sizes in freeing up family housing.

- 25.39 While the Council expects developments to broadly comply with the required housing mix, flexibility will be applied where justified. Factors such as site constraints, design considerations, scheme viability, and the specific tenure mix proposed may warrant a variation. For example, higher proportions of smaller units may be appropriate in

town centre locations or where intermediate home ownership is proposed, provided the overall mix remains balanced and contributes to meeting local needs.

25.40 To support mixed and sustainable communities, the Council will resist proposals that result in an over-concentration of one-bedroom units, either overall or within specific tenure components. This is particularly important in areas already characterised by high densities of small units or where there is a known shortfall of family housing.

25.41 Studio and bedsit units will only be permitted in exceptional circumstances, where:

- They form a very small proportion of the overall mix;
- Larger homes cannot be delivered due to site constraints; and
- The units meet high design standards, including space, light, and amenity, in accordance with London Plan Policy D6 and the design policies in this plan.

25.42 The SHMA and Housing Strategy both indicate that the need for studio units is limited, and that priority should be given to homes that can accommodate a range of household types and support long-term occupation.

Policy H4: Build to Rent

- A. The Council will support standalone Build to Rent developments or Build to Rent blocks within large mixed tenure schemes where these meet the definition in the London Plan and comply with Parts B to D of this policy.
- B. Proposals for Build to Rent will be required to provide affordable housing on-site in accordance with the London Plan subject to the following additional requirements
 - (1) Where a development proposal involving Build to Rent has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide social rented and intermediate rented homes to be managed independently by a registered provider of affordable housing. To follow the Fast Track Route, the council will seek 70% of the overall requirement for the development as social rented homes within this separate core and/or block. The 30% intermediate affordable housing requirement will normally be accepted as discount market rent accommodation within the Build to Rent element of the scheme at London Living Rent levels. If the low cost rented accommodation to be managed by a registered provider in the separate core and/or block equates to less than 70 per cent of the overall affordable housing requirement for the development, the proposal must follow the Viability Tested route. In these circumstances, the council will seek from the applicant the optimum affordable housing offer for the development as a whole.
 - (2) Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design terms to include a separate residential core and/or block in the development proposal, the Council will accept the full affordable housing requirement for the scheme as discount market rent units managed alongside the market rent units, in accordance with the requirements of London Plan policy. To follow the Fast Track Route, the council will seek 30 per cent of the affordable provision at rents equivalent to London Living Rent level, with the remainder at a range of genuinely affordable rents to meet priority housing need in Haringey. If these requirements are not met, the scheme must follow the Viability Tested Route.
 - (3) The package of discounted units below market rent will be secured through a section 106 legal agreement.
- C. The minimum covenant period for all Build to Rent proposals in Haringey will be 25 years, which will be secured through a section 106 legal agreement. In accordance with the London Plan, a clawback mechanism will apply in the event of units being sold out of the Build to Rent sector.
- D. A management plan that commits to high standards in the ongoing management of Build to Rent properties and premises must be provided and secured through a section 106 agreement.

Supporting Text

- 25.44 Build to Rent is a distinct form of housing development that contributes to housing supply, supports housing choice, and meets the needs of a growing segment of London's population. Build to Rent schemes are purpose-built, professionally managed, and typically offer longer tenancies, on-site amenities, and a consistent rental product. The London Plan 2021 (Policy H11) formally recognises Build to Rent as a distinct asset class and sets out specific policy requirements to support its delivery while ensuring affordability and quality standards are met.
- 25.45 National Planning Practice Guidance (PPG) also provides a framework for Build to Rent, defining it as housing designed for rent rather than sale, typically offering longer tenancy agreements and managed by institutional investors or specialist operators
- 25.46 The Council supports Build to Rent development as part of a diverse and balanced housing market. Build to Rent can help accelerate housing delivery, particularly on large or complex sites, and provide high-quality rental accommodation with professional management.
- 25.47 Proposals must meet the definition of Build to Rent as set out in the London Plan, including having a single ownership and management structure, offering tenancies for at least three years, providing on-site management and being subject to a covenant for accommodation to remain in the rental sector for a minimum period.
- 25.48 Build to Rent schemes may come forward as standalone developments or as part of larger mixed-tenure schemes, where they can contribute to housing mix and delivery. In accordance with London Plan Policy H11, Build to Rent schemes must provide affordable housing on-site, with a minimum of 35% (by habitable room) to qualify for the Fast Track Route. The Council applies additional local requirements to ensure that affordable housing within Build to Rent schemes meets local needs and is appropriately managed:

i. Separate Core Provision for Social Rent:

Where feasible, schemes with multiple cores or blocks should deliver the majority of affordable housing (70%) as social rented homes in a separate core or block, managed by a Registered Provider. The remaining 30% may be provided as Discount Market Rent (DMR) units at London Living Rent levels within the Build to Rent element. This approach ensures that social rented homes are delivered at scale and managed by experienced providers.

ii. Integrated Affordable Housing Where Separate Core Not Feasible:

Where a separate core is not feasible, the Council will accept all affordable housing as DMR units within the Build to Rent scheme. To qualify for the Fast Track Route, 30% of these units must be at London Living Rent levels, with the remainder at a

range of genuinely affordable rents to meet local needs. This ensures affordability is maintained even where integration is necessary.

iii. Legal Agreements:

All affordable housing will be secured through Section 106 agreements, including rent levels, eligibility criteria, and long-term affordability. This approach aligns with the London Plan's emphasis on affordability and flexibility in Build to Rent delivery, while ensuring that schemes contribute meaningfully to meeting Haringey's housing needs

- 25.49 To ensure that Build to Rent schemes remain in the rental sector and deliver long-term benefits, the Council will require a minimum covenant period of 25 years, secured through a Section 106 agreement. This exceeds the London Plan's minimum of 15 years and reflects the borough's need for long-term, stable rental housing. In line with London Plan Policy H11, a clawback mechanism will apply if units are sold out of the Build to Rent sector before the end of the covenant period. This ensures that any loss of affordable housing is mitigated through financial contributions or replacement provision.
- 25.50 High-quality management is a defining feature of Build to Rent. To ensure that Build to Rent schemes maintain high standards of service and contribute positively to neighbourhoods over the long term, the Council will require a management plan to be submitted and secured through a Section 106 agreement. This should include:
- On-site management arrangements;
 - Maintenance and repairs protocols;
 - Tenant engagement and complaints procedures;
 - Lettings and affordability commitments.

Policy H5: Small Sites and Smaller Housing Development

- A. As a component of the borough's overall housing target, the Council will meet the small sites minimum housing target for Haringey set in the London Plan 2021 by delivering at least 2,600 homes (net) over the period 2027 to 2036 on sites of less than 0.25 hectares.
- B. Development of new homes and intensification of existing housing will be particularly supported on appropriate small sites with good public transport accessibility (PTAL 3-6) and/or are within 800 metres of a tube, rail station or the boundary of an identified town centre.
- C. Proposals for additional housing within street frontages and on street corners in existing residential areas will only be supported where they are sensitively integrated into the street frontage, including by respecting the proportions and spaces of and between existing buildings.
- D. Proposals should be carefully and creatively designed and innovative design solutions should be used to ensure harm is avoided to the amenity of surrounding properties and uses, especially in terms of outlook, privacy, daylight and sunlight.
- E. Proposals for additional housing on private residential gardens will not normally be permitted and loss of garden land will only be considered acceptable where the proposal is for comprehensive redevelopment of a number of whole land plots where adequate gardens from the donor properties are secured.

Supporting Text

25.51 Small sites play a vital role in delivering new homes across London and are a key component of Haringey's Housing Strategy. The London Plan 2021 recognises that small sites (defined as those below 0.25 hectares) are a significant and underused source of housing capacity. Policy H2 of the London Plan sets a borough-wide minimum target for small site delivery, with Haringey expected to deliver at least 2,600 net additional homes on small sites over a ten year period.

25.52 This policy supports the borough's contribution to meeting London's housing needs, diversifying housing supply, and encouraging high-quality, context-sensitive intensification.

25.53 will be achieved through a combination of:

- Windfall development;
- Intensification of existing residential areas;
- Redevelopment of underused land and infill opportunities;
- Site allocations and placemaking focus area policy support.

25.54 The Council will support innovative approaches to unlocking small sites, including modular construction, community-led housing, and design-led intensification.

25.55 Consistent with London Plan Policy H2(B)(2), the Council will particularly support small site development in locations with:

- Good public transport accessibility (PTAL 3–6); and/or
- Proximity (within 800 metres) to a rail or tube station or the boundary of a designated town centre.

25.56 These locations are considered suitable for sustainable growth and can accommodate higher densities without reliance on private car use. The Council will also consider the cumulative impact of small site development in these areas to ensure infrastructure and services can support growth.

25.57 The redevelopment or intensification of street frontages and corner plots can make a valuable contribution to housing supply. However, such proposals must be sensitively integrated into the existing urban fabric. Proposals should:

- Respect the rhythm, scale, and proportions of neighbouring buildings;
- Maintain or enhance the character of the street;
- Avoid overdevelopment or visual dominance.

25.58 This approach aligns with the London Plan’s design-led principles (Policy D3) and the Mayor’s Small Sites Design Code guidance, which encourages context-sensitive intensification and should be utilised in designing proposals.

25.59 High-quality design is essential to ensure that small site development contributes positively to neighbourhoods. Proposals must comply with the design-led approach in Policy D2 and deliver high quality housing in accordance with Policy D11. The Haringey Characterisation Study should be utilised to establish the appropriate character and density of development and be consistent with any adopted design guides and/or codes where these apply. Proposals must also:

- Be carefully and creatively designed to respond to site constraints;
- Avoid harm to the amenity of neighbouring properties, particularly in terms of daylight, sunlight, privacy, and outlook;
- Demonstrate compliance with relevant design standards, including the London Plan’s Housing Design Standards.

25.60 Innovative design solutions, including split-level layouts, dual-aspect units, and green infrastructure, are encouraged to optimise site potential while maintaining liveability.

25.61 The London Plan and national policy discourage inappropriate development on private residential gardens, recognising their value for biodiversity, character, flood prevention and amenity. In line with this, the Council will resist piecemeal development of garden land. Proposals involving the loss of garden space will only be considered acceptable where:

- They form part of a comprehensive redevelopment of multiple plots;
- They deliver high-quality, well-integrated housing;
- They retain or enhance green infrastructure and biodiversity.

25.62 This approach ensures that intensification does not come at the expense of local character or environmental quality, and retains sufficient useable garden space to meet the needs of the donor properties.

25.63 Where schemes are for 5 units or more (gross), affordable housing will be required in accordance with Policy H2.

Policy H6: Self-build, Custom-build and Community-led Housing

- A. The Council will support proposals for self-build, custom-build homes and community-led housing, subject to compliance with relevant policies.
- B. Large developments of 0.25ha or more should seek to make provision for serviced plots of land for self/custom build housing, subject to identified need for self-build or custom housebuilding as identified on the Haringey self-build and custom housebuilding register and having regard to the characteristics and constraints of the site and area.

Supporting Text

- 25.64 Self-build, custom-build, and community-led housing offer important opportunities to diversify housing supply and promote innovation in design and construction. These forms of housing are recognised in national policy as a means to increase consumer choice and support sustainable, inclusive development.
- 25.65 In accordance with the Self-build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) the Council maintains a register of individuals and associations seeking to acquire serviced plots for self- or custom-build housing. There is currently minimal demand on Haringey's Register.
- 25.66 Proposals will be supported where they comply with relevant planning policies, including those relating to design, sustainability, and site suitability.
- 25.67 To ensure a pipeline of opportunities for self- and custom-build housing, the Council expects larger development sites (0.25 hectares or more) to consider the inclusion of serviced plots, subject to:
- The level of demand evidenced by the Council's self-build and custom housebuilding register;
 - The characteristics and constraints of the site;
 - The need to balance delivery of other policy priorities, including the efficient use of land, affordable housing and infrastructure.
- 25.68
- 25.69 This approach aligns with national planning guidance, which encourages authorities to consider policies that require a proportion of plots on larger sites to be made available for self- and custom-build housing.

Policy H7: Housing Older People and Vulnerable People

- A. The Council will aim to facilitate the provision of housing for older people and vulnerable people to meet the needs of the borough's communities. The Council encourages specialist housing types that allow people to live as independently as possible and specialist housing options at a range of costs to accommodate the different financial circumstances of residents, in line with evidenced local need.

- B. Proposals for housing aimed at meeting the specific needs of older people and vulnerable people will be supported provided that all of the following criteria are met:
 - (1) There is a demonstrable need in Haringey for the type of accommodation proposed, having regard to London Plan benchmarking or to the evidence set out in the Council's most up-to-date Strategic Housing Market Assessment, where this is relevant, and the Council's commissioning and housing strategies
 - (2) The use is suitable for the site considering the surrounding neighbourhood, potential for development of other priority land uses and its contribution to mixed and balanced communities
 - (3) The scheme provides a good level of accessibility to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers
 - (4) The scheme is of a high-quality and meets relevant best practice guidance for the form of accommodation proposed
 - (5) It is demonstrated that proposed accommodation has considered needs of the intended occupiers and the type of facilities proposed, the level of independence promoted and the amount of management, supervision, support and/or care proposed is appropriate for the intended occupiers.
 - (6) The location, internal and external design of the buildings, and their accessibility helps facilitate independence and social integration.
 - (7) The impact of the proposed development would not be detrimental to the amenity of the local area or to local services including not resulting in a harmful over-concentration of supported and specialist accommodation within the locality
 - (8) There are arrangements in place for appropriate long-term management of
 - (9) the housing
 - (10) Provision is made for affordable housing in accordance with Policy H2.

- C. Existing accommodation for older and vulnerable people will be protected. The Council will resist proposals which involve the loss of floorspace of accommodation for older people and vulnerable people unless:
 - (1) Adequate replacement on-site accommodation, including affordable housing, will be provided for the particular need group that results in

improved standards and quality of accommodation and meets the criteria in Part A of this policy.

- (2) It can be robustly demonstrated that there that the accommodation is no longer needed for the particular group or other relevant groups in need and it can be demonstrated that the existing accommodation is unsatisfactory for modern standards and/or not fit for purpose for its current use or other related types of accommodation.

Sheltered housing, specialist older person accommodation and extra-care

- D. Sheltered housing, specialist older person accommodation and extra care accommodation will be classed as a C3 use where the accommodation comprises self-contained homes. Such accommodation will be required to provide affordable housing in accordance with Policy H2. Alternative affordable tenures will be considered where it is demonstrated that the accommodation proposed is genuinely affordable to older people in the borough and suitable to their needs.
- E. Proposals for sheltered, specialist older person and extra care accommodation must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
 - (1) homes and rooms meet or exceed minimum space standards and addresses other requirements for private internal space
 - (2) there is appropriate privacy of internal spaces in the building for relevant groups, namely residents and any staff accommodation/rooms
 - (3) appropriate bathrooms, kitchen/laundry facilities and appropriate rooms for activities/therapy/community use are provided
 - (4) appropriate wheelchair accessibility
 - (5) good quality guest and/or staff accommodation (where appropriate) is provided in line with minimum space standards, with sufficient storage space and facilities for visitors and staff;
 - (6) servicing access and a safe drop off point is within 50m of the main entrance

Care home and nursing home accommodation

- F. Proposals for care home and nursing home accommodation must demonstrate that the following design issues have been considered and addressed to ensure the accommodation is suitable for the intended occupiers:
 - (1) there is appropriate privacy of internal spaces in the building for relevant groups, namely residents and staff
 - (2) 100% of all habitable rooms are wheelchair accessible;
 - (3) accommodation is provided in line with relevant design guidance and best practice standards;

- (4) servicing access and a safe drop off point is provided within 50m of the main entrance. This must be appropriate for ambulance/mini bus drop-off; and
- (5) provision of accessible communal outdoor space for use by residents, staff and visitors of a good quality and which is designed to ensure a good level of amenity.

Supporting Text

- 25.70 Haringey's population is experiencing increasing demand for housing that meets the needs of older people and vulnerable groups. The Council recognises the importance of enabling residents to live independently, safely, and with dignity in homes that are accessible, affordable, and integrated into the wider community.
- 25.71 The Haringey Strategic Housing Market Assessment (SHMA) (2021) identifies a need for approximately 2,962 additional specialist older person housing units by 2037, including sheltered and extra-care accommodation. This is consistent with the London Plan (Policy H13), which sets a strategic benchmark of 110 units per annum for Haringey. The SHMA also highlights that over half of household growth to 2037 will be from households headed by someone aged 65 or over. This underlines the importance of planning for a diverse range of housing options that are accessible and affordable, in line with the NPPF (paragraphs 61 and 63).
- 25.72 To ensure that new housing for older and vulnerable people meets local needs and contributes positively to communities, proposals must satisfy the policy criteria to ensure that the increasing population of older people is met in a suitable way. Sites should be appropriate for the proposed use, taking into account surrounding land uses, the potential for mixed and balanced communities, and be well-located in relation to public transport, shops, health services, and community facilities, ensuring residents can access essential services independently.
- 25.73 All schemes must meet best practice design standards for the relevant accommodation type. This includes compliance with Building Regulations M4(2) and M4(3), as required by London Plan Policy D7 and proposals must demonstrate that the level of care, support, and facilities is tailored to the needs of the intended occupiers, whether independent living or higher levels of support are required. The design and layout should support social interaction, independence, and integration with the wider community, in line with NPPF paragraph 96 and London Plan Policy GG1.
- 25.74 Applicants must demonstrate that robust management arrangements are in place to ensure the long-term sustainability and quality of the accommodation.
- 25.75 The SHMA identifies a current shortfall in specialist housing, particularly for affordable rented extra-care and dementia care units. The Council will therefore resist the loss of existing accommodation unless it is clearly demonstrated that the accommodation

is no longer needed or is not fit for purpose, and that suitable replacement provision is made.

25.76 Where accommodation comprises self-contained units, it will be treated as C3 use and subject to affordable housing requirements. The Council will consider alternative affordable tenures where it can be demonstrated that these are genuinely affordable and suitable for older people in Haringey.

25.77 Design considerations must include:

- Compliance with minimum space standards
- Privacy for residents and staff
- Provision of appropriate communal and support facilities
- Wheelchair accessibility (M4(3))
- Guest and staff accommodation
- Safe and convenient servicing and drop-off access

25.78 Care and nursing homes must be designed to meet the specific needs of residents, including:

- Full wheelchair accessibility
- High-quality communal outdoor space
- Privacy and dignity for residents
- Safe and accessible servicing and drop-off areas

25.79 The SHMA identifies a growing need for care accommodation, particularly for those aged 85+, whose population is projected to increase by nearly 2,000 by 2037.

Policy H8: Large-scale Purpose-built Shared Living

- A. Proposals for large-scale purpose-built shared living must not compromise the supply of land for conventional self-contained homes (use class C3) and will only be supported where a site allocation provides for such uses as an ancillary component of a larger mixed tenure development. Development proposals will otherwise be resisted.

- B. Proposals for large-scale purpose-built shared living must meet the criteria for such development in the London Plan and in addition:
 - (1) demonstrate the use contributes to a mixed and inclusive neighbourhood and would not result in an over-concentration of single-person accommodation in the local area
 - (2) provide a high-quality living environment in line with the relevant policy requirements set out in Policy D11 and London Plan guidance
 - (3) contain good-sized rooms with adequate daylight, sunlight, aspect and functional living space and layout, but are not designed as self-contained homes or capable of being used as self-contained homes
 - (4) provide high-quality and well-integrated communal facilities and services sufficient to meet the requirements of the intended number of residents including providing convenient access to a communal
 - (5) kitchen, access to both internal and outside communal amenity space
 - (6) provide at least 10% of rooms which are wheelchair accessible or readily adaptable for occupation by wheelchair users as well as suitable access for wheelchair users throughout all communal facilities, circulation areas and accessible bed spaces
 - (7) demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood
 - (8) provide a contribution towards the provision of conventional affordable housing in the borough in accordance with the London Plan.

- C. Proposals should provide communal workspace and promote use of this by the surrounding local community to promote integration with the local area.

- D. The conversion of student or visitor accommodation to large-scale purpose-built shared living will be supported where it meets the criteria above, and there it is proven there is no longer a current or future need for the student or visitor accommodation.

Supporting Text

- 25.80 The policy ensures that large scale purpose built living developments (LSPBSL) are only brought forward in appropriate locations, meet high standards of design and management, and do not compromise the delivery of conventional housing, particularly affordable homes.
- 25.81 The Haringey Housing Strategy 2024–2029 identifies a pressing need for genuinely affordable, self-contained homes, particularly for families and vulnerable groups. It explicitly states that there is no identified need for additional co-living accommodation in the borough and that such schemes should not be brought forward where they would displace conventional housing.
- 25.82 This approach is consistent with London Plan Policy H16, which states that LSPBSL should only be supported where:
- It does not compromise the supply of self-contained housing (Use Class C3).
 - It contributes to a mixed and inclusive neighbourhood.
 - It meets specific design, management, and affordability criteria.
- 25.83 The London Plan Guidance (LPG) on LSPBSL (2024) provides further detail on how to apply Policy H16 and sets out clear benchmarks for assessing the quality, location, and integration of such schemes, and will be applied to proposals in Haringey in conjunction with this policy.
- 25.84 To protect land for conventional housing, this policy restricts LSPBSL to sites where it is explicitly supported by a site allocation as part of a mixed-tenure development. This ensures that the borough's limited land supply is used efficiently and in line with local housing priorities, and on sites that are large enough to deliver genuinely mixed and balanced communities, by providing for a large range of tenures including LSPBSL which cannot be achieved on smaller, standalone sites.
- 25.85 The Council will resist LSPBSL where it would undermine the delivery of affordable housing or lead to an overconcentration of single-person accommodation
- 25.86 The policy requires that LSPBSL schemes:
- Provide good-sized private rooms with adequate daylight, aspect, and layout, but are not designed to be self-contained homes.
 - Include high-quality communal facilities, such as kitchens, lounges, and outdoor amenity space, in line with LPG benchmarks.
 - Deliver inclusive design, with at least 10% of rooms wheelchair accessible or adaptable, and full accessibility across communal areas.
- 25.87 These requirements reflect the LPG's emphasis on ensuring that LSPBSL schemes are fit for purpose, meet the needs of residents, and are safe, inclusive, and well-integrated into their neighbourhoods

- 25.88 The policy requires a comprehensive management plan to demonstrate how the scheme will be operated and maintained over its lifetime. This is essential to ensure:
- A high standard of living for residents.
 - Minimal impact on neighbouring properties.
 - Effective control of noise, waste, and communal space use.
- 25.89 The LPG highlights the importance of long-term management in ensuring that LSPBSL schemes remain high-quality and do not negatively affect surrounding communities
- 25.90 In line with London Plan Policy H16, the policy requires that LSPBSL schemes make a financial contribution toward affordable housing elsewhere in the borough. This ensures that such developments contribute to meeting local housing needs, even if they do not provide affordable units on-site.
- 25.91 Schemes that incorporate affordable workspace can help improve the attractiveness of this form of accommodation and supports a diverse mix of uses and users. It also aligns with the London Plan Guidance on LSPBSL, which encourages developments to contribute to mixed and inclusive neighbourhoods. It can also provide services that benefit residents directly—such as cafés, studios, or co-working spaces. In dense urban areas such as Haringey, combining residential and employment uses makes efficient use of land, especially where ground floor units may not be suitable for residential use due to noise, access, or privacy concerns.
- 25.92 The policy supports the conversion of obsolete student or visitor accommodation to LSPBSL where there is no longer a need for the original use and where the new use meets all relevant criteria. This promotes the efficient reuse of existing buildings while ensuring that new uses are appropriate and well-managed.

Policy H9: Purpose-built Student Accommodation

- A. Proposals for new purpose-built student accommodation housing must not compromise the supply of land for conventional self-contained homes (use class C3) and will only be supported where a site allocation provides for such uses as a component of a larger mixed tenure development and it is demonstrated the accommodation will contribute to meeting an identified strategic need, giving priority to local need. Development proposals will otherwise be resisted.
- B. In addition, proposals for new purpose-built student accommodation must meet all the following criteria:
 - (1) demonstrate the use contributes to a mixed and inclusive neighbourhood and would not result in an over-concentration of single-person accommodation in the local area
 - (2) be secured via nomination agreement for sole occupation of students from one or more specific educational institution based in Haringey or within London
 - (3) locate student accommodation in separate buildings from other residential uses in the development
 - (4) contain good-sized rooms with adequate daylight, sunlight, aspect functional living space and layout
 - (5) provide high-quality and well-integrated communal facilities and services sufficient to meet the requirements of the intended number of residents including providing convenient access to communal cooking facilities and both internal and outside communal amenity space
 - (6) provide at least 10% of student rooms which are wheelchair accessible or readily adaptable for occupation by wheelchair users as well as suitable access for wheelchair users throughout all communal facilities, circulation areas and accessible bed spaces
 - (7) be accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood
 - (8) provide affordable student accommodation in line with the London Plan.
- C. The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets housing requirements identified in this plan.

Supporting Text

- 25.94 The Haringey Housing Strategy 2024–2029 identifies no current need for additional purpose-built student accommodation in the borough and prioritises the delivery of conventional housing, particularly genuinely affordable homes for families. The

Strategy states that purpose-build student accommodation should not be brought forward where it would displace opportunities for conventional housing, especially in areas of high housing need. Haringey faces a severe housing shortage, with around 14,000 households on the housing register and more than 2,600 in temporary accommodation. The Housing Strategy prioritises the delivery of:

- Family-sized homes.
- Supported housing for vulnerable groups.
- Genuinely affordable homes for rent.

25.95 Purpose-build student accommodation, while important in some boroughs with large student populations, is not currently a strategic priority in Haringey. The policy therefore ensures that:

- Purpose-build student accommodation is only permitted where it meets a clearly evidenced need.
- It does not displace opportunities for conventional housing.
- It contributes to the borough's wider housing, design, and sustainability objectives.

25.96 This approach is consistent with London Plan Policy H15, which requires boroughs to plan for purpose-build student accommodation only where there is demonstrable local or strategic need, and where it would not compromise the delivery of conventional housing. The London Plan Guidance (LPG) on PBSA (2024) further clarifies that PBSA should:

- Be located in well-connected, well-served areas with good access to public transport and local services.
- Avoid over-concentration in any one area to support mixed and inclusive neighbourhoods.
- Be integrated into the surrounding community, with high-quality design and public realm.
- Include a proportion of affordable student accommodation, secured through nominations agreements with higher education institutions

25.97 Proposals should accord with the principles in this policy and the standards set out in the London Plan Guidance (LPG) on purpose-build student accommodation (2024).

25.98 The policy requires that purpose-build student accommodation PBSA schemes:

- Are of high design quality, respecting local character and amenity.
- Provide appropriate internal and external amenity space, including communal areas and cycle storage.
- Are inclusive and accessible, with a proportion of rooms meeting wheelchair standards.
 - Are supported by a management plan to ensure long-term quality and minimise impacts on neighbours.

25.99 These requirements reflect the London Plan Guidance on purpose-build student accommodation, which emphasises the importance of place-making, wellbeing, and integration with the wider community.

Policy H10: Gypsy and Traveller Accommodation

- A. The Council will safeguard the two existing permanent gypsy and traveller sites in borough as identified on the Policies Map and set out below and will not permit their redevelopment unless they are replaced by equivalent or improved accommodation in suitable locations within Haringey:
 - (1) Wallman Road, N22 (6 pitches)
 - (2) Clyde Road, N15 (4 pitches)
- B. The Council will seek to meet identified of at least 33 gypsy and traveller pitches over the period to 2032. To achieve this, it will:
 - (1) Deliver new permanent gypsy and traveller sites on council owned land
 - (2) Continue to cooperate actively with other public sector bodies and private landowners to identify further land suitable for gypsy and traveller accommodation and to facilitate necessary provision
 - (3) Support proposals for gypsy and traveller accommodation on windfall sites, subject to compliance with Part C of this Policy.
- C. Proposals for new sites and/or pitches will be supported provided that they meet all of the following criteria:
 - (1) they meet a demonstrable accommodation need supported by relevant evidence
 - (2) the site does not have any relevant pre-existing policy designations that restrict the use of the site such as being designated as Metropolitan Open Land or being at high risk from flooding
 - (3) the site is not allocated for other uses e.g. employment
 - (4) the site is suitable for residential development and occupation
 - (5) the site has, or will have, a supply of essential services, such as mains gas and electricity, water, sewerage and drainage and waste disposal.
 - (6) the site is easily accessible from the public highway and provides safe and suitable access for the type of vehicles that could reasonably be expected to use the site
 - (7) the site has good access to public transport, services and facilities, in particular schools and health services
 - (8) the layout of the site, associated facilities and landscaping, including pitches, hard-standings, amenity blocks, parking and turning areas, amenity and play spaces and boundary and landscaping treatments, are well planned to ensure the amenity of site residents and adjoining occupiers and facilitate the proper integration of the site within the surrounding environment and communities
 - (9) the development does not cause detriment to the natural environment including harm to/the loss of designated Metropolitan Open Land, Sites of Importance to Nature Conservation, woodland and watercourses

- (10) the development and the proposed use would not harm neighbours' living conditions and would be compatible with surrounding uses, including as a result of potential disturbance from vehicular movements and on-site activities
- (11) development is respectful of and sensitive to the local character.

Supporting Text

25.100 This policy sets out the Council's approach to meeting the accommodation needs of Gypsy, Roma, and Traveller (GRT) communities in Haringey. It reflects the Council's commitment to inclusion, equality, and the right to a safe, secure home for all residents, as articulated in the Haringey Housing Strategy 2024–2029.

25.101 The Housing Strategy recognises that GRT communities face systemic discrimination, social exclusion, and acute housing need, including overcrowding and insecure living conditions. It commits to increasing the number of pitches available to the local Gypsy, Roma, and Traveller community over the next five years, in partnership with those communities.

25.102 The National Planning Policy Framework (NPPF) and the accompanying Planning Policy for Traveller Sites (PPTS) require local authorities to assess and plan for the accommodation needs of Gypsies and Travellers. The NPPF defines Traveller sites as a form of residential development and requires that they be considered fairly and equally alongside other housing needs.

25.103 The NPPF also requires that local plans:

- Identify a supply of deliverable sites to meet the identified need for Traveller accommodation.
- Ensure that sites are sustainable, with access to local services and infrastructure.
- Protect the best interests of children and promote peaceful and integrated co-existence between the site and the local community.

25.104 Policy H14 of the London Plan 2021 commits the Greater London Authority (GLA) to delivering a pan-London Gypsy and Traveller Accommodation Needs Assessment (GTANA) to provide a consistent and up-to-date evidence base to inform borough-level planning and ensure that the needs of GRT communities are addressed across London. The pan-London GTANA, due to be published later in 2025, indicates a need in Haringey for 33 additional pitches to 2032.

25.105 The above policy seeks to:

- Safeguard existing authorised sites in the borough
- Support the delivery of new pitches including on council-owned land
- Ensure that new provision is well-designed, safe, and appropriately located.

- 25.106 This policy is underpinned by the Council's broader commitment to tackling inequality and promoting inclusive communities. The Housing Strategy explicitly recognises the disproportionate barriers faced by GRT communities in accessing housing and services. By planning positively for their accommodation needs, the Council aims to reduce inequality, promote social inclusion, and uphold the rights of all residents.
- 25.107 Consistent with the above commitment, the Council is taking the lead on delivery of new permanent gypsy and traveller pitches as part of its council housebuilding programme.
- 25.108 The site assessment criteria for windfall are designed to ensure that proposals for Gypsy and Traveller accommodation in Haringey are evidence-based, sustainable, inclusive, and compatible with their surroundings. They reflect national and regional planning policy, as well as local strategic priorities.
- 25.109 The PPTS (Policy E) makes clear that Traveller sites in the Green Belt or other protected areas (such as Metropolitan Open Land) are generally inappropriate unless very special circumstances can be demonstrated. Similarly, the NPPF requires that development in areas at high risk of flooding must be avoided unless it can be demonstrated to be safe and sustainable.
- 25.110 To ensure efficient land use and avoid undermining strategic employment or infrastructure objectives, sites allocated for other uses (e.g. employment land) should not be used for Traveller accommodation unless there is clear justification and no conflict with wider planning priorities.
- 25.111 Traveller sites are a form of residential development and must meet the same basic standards of habitability, safety, and amenity as other forms of housing. This includes considerations such as noise, air quality, and proximity to incompatible land uses.
- 25.112 The PPTS (Policy H) requires that sites should be sustainable economically, socially, and environmentally. This includes access to essential services such as water, electricity, waste disposal, and drainage. The Haringey Housing Strategy also emphasises the importance of ensuring that all homes, including Traveller accommodation, are safe, healthy, and well-serviced. Sites must be accessible from the public highway and capable of accommodating the types of vehicles typically used by Traveller households. This is essential for safety, emergency access, and integration with the wider transport network. The PPTS also highlights the importance of locating sites in areas with good access to local services, particularly schools and healthcare. This supports the social inclusion of Traveller families and ensures that children can attend school regularly and residents can access healthcare and employment opportunities.

- 25.113 Well-planned site layouts are essential for the health, safety, and wellbeing of residents. The layout should include adequate space for pitches, amenity blocks, play areas, and landscaping. The Haringey Housing Strategy commits to ensuring that all new housing, including Traveller accommodation, is well-designed and integrated into the surrounding community to promote inclusion and reduce stigma.
- 25.114 Traveller sites must not cause harm to designated natural assets such as Sites of Importance for Nature Conservation (SINCs), woodland, or watercourses. This aligns with the NPPF's overarching environmental objectives and Haringey's commitment to biodiversity net gain and climate resilience.
- 25.115 Traveller sites should be designed to respect the character and appearance of their surroundings. This includes appropriate boundary treatments, landscaping, and materials. The Haringey Housing Strategy supports inclusive, place-based approaches that celebrate and enhance local identity.

Policy H11: Loss of Existing Housing

- A. Proposals involving the loss of existing self-contained homes will only be permitted where homes lost are replaced with new self-contained homes at existing or higher densities with at least the equivalent level of overall floorspace and no loss in family-sized homes or where one of the following criteria is met:
- (1) the land or buildings are no longer suitable for residential use and it is considered inappropriate to re-provide homes
 - (2) the proposal will enable sub-standard units to be enlarged to meet minimum residential space and amenity standards
 - (3) the proposal is for an essential community use or infrastructure for which there is demonstrable need, and it can only be provided by the loss of existing residential floorspace
 - (4) the proposal involves combining no more than two non-family-sized dwellings in order to create a family-sized dwelling and the total floorspace of the new dwelling created will be less than or equal to 125 square metres. Conversion of two or more units into a single dwelling is considered material and would require planning permission.
- B. Proposals that involve the loss or demolition of existing affordable housing, including estate renewal, will be assessed in accordance with London Plan Policy H8. Demolition of affordable housing will not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace, with an emphasis on achieving an uplift in provision wherever possible. It is expected that any schemes which come forward are delivered in accordance with the principles and commitments to tenants and leaseholders in the Council's Housing Strategy.

Supporting Text

25.116 This policy seeks to safeguard Haringey's existing housing stock, particularly self-contained and affordable homes. It aligns with the strategic objectives of the Haringey Housing Strategy 2024–2029, especially the commitments to prevent homelessness, reduce overcrowding, and ensure that housing remains genuinely affordable and accessible to all.

25.117 To address this, the policy:

- Resists the loss of self-contained homes unless they are replaced at equal or higher density and with no net loss of family-sized units.
- Supports the consolidation of substandard units into larger, higher-quality homes where this results in improved living conditions and aligns with space standards.
- Allows for the conversion of smaller units into family-sized homes, helping to rebalance the housing stock in favour of larger dwellings.

- 25.118 This approach is consistent with London Plan Policy H9 (Ensuring the best use of stock), which encourages boroughs to resist the net loss of housing, particularly where it would reduce the availability of homes for families.
- 25.119 The Housing Strategy commits to delivering 3,000 new council homes by 2031 and prioritises genuinely affordable housing, particularly for social rent. However, it also recognises that the loss of existing affordable homes through redevelopment or estate renewal can undermine these efforts if not carefully managed.
- 25.120 In line with London Plan Policy H8 (Loss of existing housing and estate redevelopment), this policy:
- 25.121 Requires that any loss of affordable housing is replaced on a like-for-like basis in terms of floorspace, tenure, and affordability.
- 25.122 Emphasises the importance of achieving an uplift in affordable housing provision wherever possible.
- 25.123 Reinforces the Council's commitment to its own Housing Strategy principles, including tenants' rights, co-production, and a right of return for residents affected by estate renewal.
- 25.124 This ensures that renewal schemes do not displace existing communities or reduce the overall supply of affordable homes, and that they are delivered in a way that is equitable, transparent, and accountable.

Policy H12: Residential Conversions, Houses in Multiple Occupation, and Hostels

Residential conversions

- A. To maintain a supply of family homes, the conversion of a house into a larger number of self-contained units will only be permitted where the following criteria are satisfied:
 - (1) The gross original internal floor space of the existing dwelling is greater than 125 square metres
 - (2) At least one family-sized home is provided with direct access to a dedicated rear garden
 - (3) The total number of new homes resulting from the conversion is optimised in line with the housing size mix priorities in Policy H3
 - (4) The housing mix does not contain any studio/bedsit units or more than a single bedroom unit.
- B. Proposals must be high-quality, comply with relevant space and amenity standards and design policies, including policy D11, and in addition should:
 - (1) Provide only self-contained homes
 - (2) Ensure adequate access is provided to each home
 - (3) Deliver an appropriate layout that is practical and fit for purpose and protects the amenity of occupiers and neighbours, including the relationship of rooms on different floors within the scheme, and the position of entrances, extensions and fire escapes
 - (4) Ensure design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retains a single door to the front elevation of the property in residential areas
 - (5) Be supported by a car parking survey which demonstrates that there is residual car parking supply to meet the need created by the proposal

Houses in Multiple Occupation

- C. Proposals for the conversion of homes to Houses in Multiple Occupation (HMOs), including to small Houses in Multiple Occupation (3-6 unrelated people) where planning permission is required (such as within the areas covered by the Article 4 Direction), will only be permitted where:
 - (1) The gross original internal floor space of the existing dwelling is greater than 125 square metres; and
 - (2) Fewer than 5% of dwellings in the ward have a property licence as a House in Multiple Occupation; and
 - (3) Fewer than 10% of dwellings on the street have a property licence as a House in Multiple Occupation

- (4) There are acceptable levels of public transport accessibility (PTAL 3 or higher), and access to shops and services appropriate to the needs of the intended occupiers
- D. Subject to compliance with Part A of this policy, HMOs will be supported provided that all of the following criteria are met:
 - (1) The proposal provides a good standard of accommodation and is in accordance with the Council's House in Multiple Occupation Standards including relevant space standards
 - (2) The clear design intent is for the property to be used as an HMO rather than as bedsits or flats (e.g. there are no cooking and washing facilities in bedrooms)
 - (3) Suitable provision is provided for storage and collection of waste in accordance with Policy D12
 - (4) It is demonstrated through the submission of a management plan that the development will be managed and maintained over its lifetime so as to not to give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood or the neighbourhood's character including with respect to refuse provision, cycle parking and car parking
- E. The Council will resist the loss of good quality licensed HMOs except where these are proposed to be returned into use as a family-sized home.

Hostels for specific at risk groups

- F. Proposals for the conversion of homes into use class C3(b) accommodation for specific at risk groups must be supported by a management plan approved by the Care Quality Commission and provide adequate communal facilities including kitchen, living room and an office which can be used as a private meeting room.

Supporting Text

25.125 This policy seeks to ensure that the borough's housing stock continues to meet the needs of Haringey's diverse and growing population by managing the quality, type, and distribution of residential conversions, Houses in Multiple Occupation (HMOs), and hostels. It aligns with the strategic objectives of the Haringey Housing Strategy 2024–2029, particularly in relation to improving housing quality, protecting family housing, and ensuring that all homes are safe, decent, and well-managed.

25.126 The conversion of single-family homes into multiple smaller units can contribute to housing supply but must be carefully managed to avoid the loss of much-needed family-sized accommodation. The Housing Strategy identifies a chronic shortage of larger homes, with 35% of households on the housing register needing three-bedroom homes and 12% needing four or more bedrooms. Only one-

third of council homes have three or more bedrooms, and overcrowding is a significant issue.

25.127 To address this, the policy:

- Requires a minimum floor area of 125 sqm to ensure that conversions are only permitted where the original dwelling is large enough to accommodate multiple high-quality units.
- Mandates the retention of at least one family-sized unit (3 bedrooms+) with access to a private garden, supporting the Housing Strategy's emphasis on family-friendly housing and healthy living environments.
- Prohibits studio flats and limits one-bedroom units to avoid poor-quality, cramped accommodation that does not meet the borough's housing needs.

25.128 This approach is consistent with London Plan Policy H9 (Ensuring the best use of stock), which encourages boroughs to resist the loss of housing that is in short supply, particularly family-sized homes.

25.129 HMOs play an important role in providing low-cost housing, particularly for younger people and those on lower incomes. However, the Housing Strategy highlights that over 25% of private rented homes in Haringey are in poor condition, and HMOs, especially those poorly managed, pose greater risks to health and safety.

25.130 To address these risks and avoid overconcentration, the policy:

- Sets thresholds for HMO saturation at the ward and street level, in line with the Housing Strategy's commitment to balanced communities and neighbourhood cohesion.
- Requires a minimum floor area of 125 sqm to ensure adequate space and living conditions.
- Aligns with the Council's Article 4 Direction, which removes permitted development rights for small HMOs in parts of the borough, particularly in the east where concentrations are highest.
- Requires compliance with the Council's HMO Standards and submission of a management plan to ensure long-term quality and minimise impacts on neighbours.

25.131 This is supported by London Plan Policy H11 (Purpose-built shared living), which emphasises the need for high-quality, well-managed shared accommodation and the avoidance of overconcentration.

25.132 The Housing Strategy identifies the need for supported housing for vulnerable groups, including people experiencing homelessness, those with mental health needs, and young adults with SEND. It also commits to co-producing supported housing with residents and ensuring that it is safe, inclusive, and well-managed.

25.133 This policy supports the provision of hostels for specific groups at risk provided that they are of a satisfactory standard having regard to the intended occupiers. It does this by:

25.134 Requiring hostels to provide adequate communal facilities and a management plan approved by the Care Quality Commission.

- Ensuring that such accommodation is designed to meet the specific needs of at-risk groups, in line with the Housing Strategy's emphasis on co-production, safeguarding, and quality of life.

25.135 This aligns with London Plan Policy H12 (Supported and specialised housing), which supports the delivery of high-quality supported accommodation that meets identified local needs.

26. Social Infrastructure

Introduction

- 26.01 The Council's Haringey 2035 vision is that the borough is a place where we can all belong and thrive where:
- all our residents have the opportunity to thrive and enjoy the best possible version of their life
 - the quality of life in every part of the borough is comparable to our cleanest, greenest and safest neighbourhood
 - at a time of insecurity and change, Haringey is a place where people can put down roots and feel they really belong
- 26.02 Key to the delivery of this is the provision of high-quality and accessible social infrastructure comprising the range of services and facilities required to meet needs of our residents and communities. This includes schools, health provision, libraries, community halls, recreation and sports facilities, places of worship, youth centres, play spaces and public toilets.
- 26.03 Social infrastructure provides many benefits whether supporting health and wellbeing, facilitating social integration or helping instil a sense of community identity, place and pride. This is why our New Local Plan sets out a Placemaking Priority for a borough where our social infrastructure supports us to *Live Well*. In turn, this will help deliver on the social objective of the planning system - one of 3 objectives for the planning system outlined in paragraph 8 of the NPPF.
- 26.04 Haringey is fortunate to have a wide array of excellent social infrastructure from the purpose-built Welbourne Health Centre in Tottenham to the Rising Green Youth Hub in Wood Green and the wonderfully preserved Grade II Listed Hornsey Library. However, not all our social infrastructure is in the right location, in good condition, or capable of responding to the changing needs and aspirations of our growing communities and the challenges posed by the economy and a changing climate. In this context it is vital that a strategic approach is taken to the future provision of infrastructure in the borough. The Draft Local Plan policies which follow set out how land use and development will protect and invest in our social infrastructure, helping deliver new and improved provision that is better connected and able to serve our residents, particularly the most vulnerable.

Policy S1: Living Well

- A. The Council will plan strategically to deliver an integrated and efficient social infrastructure network which optimises the benefits of such infrastructure for residents and communities and helps them to live well, including via locality-based approaches.
- B. The Council will work together with its delivery partners, local communities, and stakeholders to identify social infrastructure needs over the plan period and ensure these are met. This will be achieved through:
 - (1) safeguarding and enhancing existing social infrastructure and the timely delivery of new and replacement high-quality social infrastructure in appropriate locations in accordance with Policy S2.
 - (2) securing delivery of new and enhanced social infrastructure from new development where this is required within site allocations or otherwise securing contributions from new development towards new and improved social infrastructure where this is necessary to mitigate the impact of the development
- C. To help ensure Haringey is a borough which meets the needs of people of all ages, abilities and backgrounds, development must provide play spaces in accordance with Policy S3 and support improved public toilet provision in accordance with Policy S4.

26.05 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Increases opportunities for everyone to access the services and facilities they need to enjoy a good quality of life

A HEALTHY & SAFE PLACE

Plays a vital role in improving personal health and wellbeing both through direct service provision and fostering environments that encourage physical activity and mental resilience

A SUSTAINABLE & RESILIENT PLACE

Creates opportunities for people to meet, interact and build relationships supporting social integration and strengthening community ties

Supporting Text

26.06 The Council will take a strategic approach to the development of Haringey's social infrastructure network to help ensure that existing assets are used more effectively

and that future provision delivers the greatest possible benefit for our residents and communities.

- 26.07 There is strong demand for new and improved social infrastructure in Haringey but it is also recognised that existing facilities are not always fit-for-purpose or fully utilised. This may be due to factors such as inappropriate location, limited accessibility, or issues with the quality of spaces and the limited range of uses they are designed to accommodate. There are also challenges associated with the costs of ongoing management and maintenance of social infrastructure.
- 26.08 A locality-based approach to social infrastructure provision, particularly through the co-location of services from different providers, enables more integrated, efficient, and responsive service delivery. By bringing together council, NHS, and voluntary sector services within neighbourhood hubs, this model provides opportunities for early intervention, reducing duplication, and fostering stronger collaboration across agencies.
- 26.09 Locating services within communities makes them more visible and accessible, helping to build trust and relationships with residents. It also allows for better use of public assets, with fewer but higher-quality buildings that are tailored to local needs. This approach strengthens community resilience, supports multidisciplinary working, and ensures that services are designed and delivered in partnership with the people they serve.
- 26.10 Planning for social infrastructure can be complex involving a diverse range of facility types, service needs, and stakeholders. A common barrier to addressing these needs through the development process is a lack of clarity around what those needs are. The Council will work collaboratively with partners, communities, and stakeholders to build a clearer understanding of local social infrastructure needs and to ensure that these are met including through the delivery of new and replacement high-quality social infrastructure in appropriate locations.
- 26.11 Development should contribute positively towards meeting such needs. This policy therefore sets out as a starting point that existing social infrastructure should be safeguarded from development. In addition, to mitigate the impact of new development, development should either provide new and enhanced social infrastructure or contribute financially towards this. The Council will secure the delivery of new and enhanced social infrastructure on identified site allocations, major development sites, and sites with existing social infrastructure. Planning obligations will be used to secure provision whether in-kind or via financial contributions,
- 26.12 When planning to address local needs and mitigate the impact of development, applicants should consider the existing network of social infrastructure in the local area and how it is used. This should extend beyond the quantum of space available, but include the quality of that space, its accessibility, flexibility, and management of

the space. Engagement with local communities and stakeholders will be crucial in understanding place-specific needs.

- 26.13 Applicants should also explore opportunities to complement or co-locate with existing clusters of social and cultural infrastructure, particularly in town centres and designated cultural quarters, to strengthen place-based provision and community access. The level of detail expected in undertaking this work should be proportionate to the scale of the development and its impact on social infrastructure.
- 26.14 Haringey seeks to be a borough which meets the needs of people of all ages, abilities and background. In this regard this chapter includes specific policies on play space and public toilets.

Policy S2: Social Infrastructure

- A. The Council will support proposals for new social infrastructure where these are appropriately located and of a high-quality design and are shaped by residents, community organisations and stakeholders to reflect local aspirations and ensure shared ownership and sustainable outcomes.
- B. New social infrastructure should be located:
 - (1) in accessible areas where people of all ages and abilities can safely reach them. Special consideration must be given to ensure that individuals with disabilities can access these spaces easily and independently.
 - (2) to complement the wider network of facilities, with opportunities taken to consolidate and co-locate services, address gaps in existing and future provision, and complement the development of town centres and cultural quarters.
 - (3) to be integrated as a prominent and visible element of the urban environment, reinforcing the role of social infrastructure in everyday community life and enhancing its accessibility and identity.
- C. Social infrastructure should be designed to:
 - (1) provide welcoming, safe and accessible spaces for all, regardless of age, ability or background, that foster social interaction, community cohesion and a sense of belonging.
 - (2) include multi-functional spaces that can accommodate a range of activities and adapt over time to meet changing cultural and community needs, where appropriate for the intended use.
 - (3) be climate resilient, incorporating sustainable design principles and supporting environmental stewardship and community resilience to future challenges.
 - (4) provide free, publicly accessible toilets (including Changing Places toilets, where appropriate), baby change, Wi-Fi and drinking water facilities, where practical
 - (5) be durable, easy to maintain and have long-term management in mind, supported by realistic plans for ongoing operation and care.
- D. Proposals for social infrastructure facilities will, where appropriate, be:
 - (1) secured for the specific intended use/s of the facility; and
 - (2) subject to a Community Use Agreement with the Council
- E. Replacement facilities will be supported where replacement facilities are:
 - (1) of an equivalent or better quality than the facilities which are being replaced
 - (2) in an accessible location having regard to Part B of this policy
 - (3) still accessible to their existing users

(4) provided in a timely manner to ensure that the needs of the neighbourhood and wider community will continue to be met.

- F. Proposals for new and replacement facilities should have regard to relevant design guidance and standards for such facilities when demonstrating that the provision is suitable for its intended uses and users.
- G. Existing social infrastructure will be safeguarded and proposals involving the loss (whole or part) of social infrastructure will only be permitted where:
 - i. there is no current or future need for the existing uses or an alternative social infrastructure use as demonstrated through robust evidence including active marketing for a minimum continuous two-year period;
 - ii. the social infrastructure is a meanwhile use; or
 - iii. the development is necessary as part of an agreed programme of public service transformation that supports locality-based provision, aiming to achieve or sustain service improvements and related investment in social infrastructure that will benefit the neighbourhood and wider community.
- H. Where the previous use of a site was social infrastructure, redevelopment of the site will be expected to re-provide social infrastructure, unless it meets the criteria in Part G of this policy.
- I. In exceptional circumstances, where the tests in Part G of this policy are not met and it is demonstrated to the satisfaction of the council that it would not be feasible and/or effective to include replacement facilities in the proposed development, a payment in lieu may be accepted.
- J. Where it has been demonstrated satisfactorily that there is no reasonable prospect of a social infrastructure use on a site, in town centres or designated Cultural Quarters the Council's preferred alternative use will be cultural facilities.

Supporting Text

- 26.15 As Haringey's population continues to grow, it is essential that new social infrastructure is provided and that this is appropriately located, well-designed, and effectively managed to meet the evolving needs of residents. Future provision must be responsive to existing and projected local needs and integrated into the fabric of neighbourhoods to support inclusive and resilient communities.
- 26.16 When planning for social infrastructure provision, applicants should have regard to the Haringey Infrastructure Delivery Plan, placemaking aspirations set out in the relevant neighbourhood chapters, engagement with local communities and stakeholders and relevant plans, and strategies and needs assessments from social infrastructure providers.
- 26.17 The Council will seek opportunities to improve access to facilities through Community Use Agreements, enabling shared use by the wider community and extending hours

of community access where appropriate. These agreements will also address the ongoing revenue costs associated with operating the facility, helping to ensure its long-term sustainability. Applicants will be expected to demonstrate how the future of the facility will be secured, including through partnerships and management arrangements that support locality-based provision and maximise community benefit.

- 26.18 Where replacement social infrastructure is provided, it should be demonstrated that the replacement provision is equivalent to or better than the existing provision. New provision should not usually result in a net loss of floorspace of community uses, however flexibility may be applied where it would improve and not compromise the provision of facilities and delivery of services and/or is part of a wider strategy to secure more efficient locality-based provision that will sustain service delivery and benefit the neighbourhood and wider community.
- 26.19 Social infrastructure will be protected unless there is strong justification for its loss or provision of replacement facilities. Where there is a loss of a facility, other social infrastructure uses should be actively sought before alternative uses are considered. This includes sites where the previous use was social infrastructure and are now vacant or have been demolished.
- 26.20 Proposals will be required to provide robust evidence to demonstrate there is no current or future need for the existing uses or appropriate alternative social infrastructure. An active marketing campaign for community or cultural uses should be designed to attract social infrastructure providers that will address local need. Applicants should work with the Council and social infrastructure partners to ensure that relevant providers are reached through the marketing campaign. The marketing campaign should be conducted continuously for a minimum period of 2 years and offer rent or sale prices that align with the reasonable local market value for the relevant social infrastructure.
- 26.21 Evidence of a marketing campaign is not required where it can be demonstrated that redevelopment of the social infrastructure is required to support the viability of replacement provision or the wider public service transformation plan.
- 26.22 Where appropriate, the Council will seek confirmation in writing from the relevant social infrastructure provider that the proposed loss is consistent with the agreed strategy for delivery of that service in Haringey.
- 26.23 Payment in lieu of replacement facilities will only be considered in exceptional circumstances. Applicants will need to justify why in-kind provision would not be feasible and/or effective. Payments in lieu will be calculated on a case-by-case basis, depending on the nature of the facility lost, the impact of the development and local context and need.

Policy S3: Play Space

- A. The Council seeks to ensure that all children and young people in the borough have safe access to good quality, well-designed, secure and stimulating play and informal recreation. To help achieve this:
 - (1) New development must provide at least 10sqm of play space per child based upon expected child yield indicated by the GLA Population Yield calculator.
 - (2) Provision of play space in new development should accord with the benchmark standards and guidance in the GLA's Play and Informal Recreation SPG or any subsequent adopted London Plan Guidance. In areas identified as deficient in public play provision, major developments should exceed the minimum standards to address local need and improve spatial equity.
 - (3) Provision of play space should be considered from the very start of the design process with play for all ages of children and young people considered and opportunities maximised to embed 'playable' spaces into the landscape and public realm.
- B. Play spaces should be located in appropriate and accessible locations and:
 - (1) prioritise locations adjacent to residential and community uses that enable informal surveillance and foster a sense of ownership.
 - (2) avoid sites that are isolated, severed by major roads, or affected by poor air quality, noise, or other environmental hazards.
 - (3) support the co-location of children's amenities (e.g. play, early years, schools) to create compact, walkable neighbourhoods.
 - (4) ensure doorstep play opportunities are provided, particularly in higher-density developments, to support independent mobility and social interaction.
 - (5) be located at ground floor level wherever possible.
- C. Play spaces must be designed to respond to the local context, demographic needs, and inclusive design principles, including:
 - (1) ensuring full accessibility for disabled children, parents, and carers, in line with inclusive design standards as well as considering the needs of neurodiverse children.
 - (2) engaging children, families, and local communities early in the design process to ensure spaces reflect their needs and aspirations, particularly groups of children who are under-represented in the use of play spaces.
 - (3) integrating play into the wider public realm, creating multifunctional, intergenerational spaces that support informal recreation, social interaction, and biodiversity.
 - (4) incorporating natural elements such as trees, planting, and water features to enhance sensory play, shade, and environmental quality.
 - (5) providing ample wayfinding signage so it is easy for children to identify where nearby play spaces are.

(6) not being segregated by housing tenure.

- D. All play spaces must be supported by a clear management and maintenance plan, including detail on funding mechanisms, responsibilities, and community involvement.
- E. Existing play and informal recreation facilities will be safeguarded. Proposals that result in the loss of such spaces will only be supported where replacement provision of equal or greater size, quality, and functionality is delivered either on-site or within the surrounding neighbourhood. Replacement spaces must be well-connected, publicly accessible without restriction, and designed to meet the needs of both existing and future users.

Supporting Text

- 26.24 Access to safe, inclusive, and high-quality play spaces is a key priority for the Council, reflected in the Haringey Vision's 'call to action' to support children and young people's experiences and skills. Over 20% of Haringey's population is under 18 and many of the borough's youngest communities are located in areas expected to undergo significant change over the plan period.
- 26.25 To ensure development supports the play needs of children and young people, the Council will protect and enhance existing play space and maximise opportunities to deliver additional play space, particularly in communities with the greatest needs.
- 26.26 On-site play provision is expected in line with the London Plan. Off-site provision will only be acceptable where on site provision is not possible due to site-based constraints and where off-site provision of that element of play space continues to meet the needs of the development and benefit the wider community. This is more appropriate for older children and is only acceptable provided facilities are within a safe walking distance of 400 metres measured by actual routes rather than straight-line distance.
- 26.27 Where there are deficiencies in access to public play space, major developments will be expected to exceed minimum standards to help address the need. Where minimum standards cannot be exceeded this may be achieved by delivering part of the formal play space requirements within the public realm. Deficiencies will be considered across different age groups to ensure inclusive and equitable provision.
- 26.28 The location of formal play spaces should be considered from the earliest stages of the design and planning process, as part of a holistic public realm strategy. Play should be embedded throughout the development, not confined to isolated zones, ensuring that children encounter opportunities for play and social interaction as part of their everyday movement through the neighbourhood.
- 26.29 Play spaces must be easily and safely accessible, with clear sightlines and informal surveillance from surrounding homes and community uses to foster a sense of safety

and ownership. Care should be taken to avoid locating play areas near sources of poor air quality as children are especially vulnerable to the health impacts of pollution.

- 26.30 Play spaces must be designed to reflect the local context and the diverse needs of children and families. This includes ensuring full accessibility for disabled children, parents, and carers, and considering the sensory and spatial needs of neurodiverse children. Inclusive design should be embedded from the outset, avoiding segregation by tenure and ensuring all residents can access shared spaces equally.
- 26.31 Early engagement with children, families, and community groups is essential to ensure play spaces reflect lived experiences and aspirations, particularly those of children who are under-represented in the use of public space. Girls often feel less welcome in public play spaces due to design biases that favour competitive or physically dominant activities. To ensure play spaces are inclusive and equitable, it is essential to consider how girls use and experience space differently. This includes designing for social interaction, creative expression, and safety.
- 26.32 Play should be integrated into the wider public realm, creating multifunctional, intergenerational environments that support informal recreation, social interaction, and biodiversity.
- 26.33 Without ongoing care, even well-designed spaces can quickly fall into disrepair, limiting their use and undermining their value to the community. Maintenance plans should set out, at a high-level, long-term responsibilities, funding arrangements, and mechanisms for regular upkeep, including cleaning, repairs, and replacement of equipment and planting.
- 26.34 Community involvement in stewardship of these spaces, such as through resident groups, schools, or local organisations, can help foster a sense of ownership and ensure that spaces are responsive to changing needs. This is particularly important in high-density areas, where play spaces may serve a wide range of users and require active oversight to remain welcoming and accessible.

Policy S4: Public Toilets

- A. Large scale developments that are open to the public and large areas of public realm should provide and secure the future management of public toilets in accordance with London Plan Policy S6.
- B. Major developments in areas of deficiencies should provide or contribute to the delivery of public toilets.
- C. All public toilets must be supported by a clear management and maintenance plan, including funding mechanisms and responsibilities.

Supporting Text

- 26.35 Public toilets are essential infrastructure that supports health, dignity, and inclusion. Their absence can restrict mobility, increase social isolation, and disproportionately affect older people, disabled people, families with young children, and those with long-term health conditions. In Haringey, many residents report avoiding public spaces due to a lack of accessible toilets, a phenomenon known as the “loo leash.” This has direct implications for physical and mental health, economic participation, and community wellbeing.
- 26.36 Provision of public toilets should be integrated into large-scale developments and public realm schemes, particularly in areas identified as having poor access, known as “loo deserts”. Facilities must be clean, safe, and accessible to all users, including gender-neutral and Changing Places toilets. In parks and high streets, where footfall is high and needs are diverse, toilet provision should be treated as a core component of the social infrastructure network.
- 26.37 To ensure long-term viability, all public toilets must be supported by a clear management and maintenance plan, with defined responsibilities and adequate funding. The Council is working with the local community to produce a borough-wide public toilet strategy which should guide provision, with mapping of existing facilities, identification of gaps, and coordination across departments.

27. Employment and Industry

Introduction

- 27.01 The National Planning Policy Framework states that one of the three overarching objectives of the planning system is an economic one - to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure.
- 27.02 The Council's economic vision for Haringey is set out in Opportunity Haringey, our Inclusive Economy Framework, which seeks to create a fairer and greener local economy that builds on local creativity to harness Haringey's strengths.
- 27.03 The Council wants a more inclusive and resilient economy with a broad range of employment opportunities across a variety of sectors with good pay and conditions and where our businesses can grow and thrive and make a meaningful contribution to Haringey's communities. A good economy provides good work; promotes fairness and equality; supports business and enterprise resilience; contributes to environmental sustainability; and promotes positive health and wellbeing. We are committed to a community wealth building approach which builds the prosperity of local people and businesses as opportunity travels through the local economy and supports and enriches Haringey's residents and communities – economically, through employment, and socially - with an emphasis on those who are struggling.
- 27.04 The National Planning Policy Framework is clear that planning policies should help create the conditions in which businesses can invest, expand and adapt. Our New Local Plan is intended to provide a long-term planning framework to support the development of Haringey's economy and to aid in the delivery of employment intensification on key sites.
- 27.05 This Draft Local Plan contains policies to ensure that:
- there is sufficient land available to meet the demands of various types of employment in the future including office, industrial, logistics, warehousing and other related types of employment floorspace
 - employment premises are delivered that are fit for changing work styles such as flexible, hybrid and co-working space
 - affordable employment space is delivered to meet identified local needs
 - improvements are secured to the local environment of our industrial and other employment areas
 - development contributes to increased employment, skills development, apprenticeships, and other education and training opportunities for the borough's residents.

27.06 Employment uses, for the purposes of the Local Plan, are as set out below and

- Class B2 – general industrial (buildings used for any industrial process)
- Class B8 – storage and distribution (all types of storage e.g. warehouses or outside storage as well as distribution use).
- Specific subclasses of Class E - Commercial, Business and Service as follows
 - (g)(i) office,
 - (g)(ii) research and development
 - (g)(iii) any industrial process which can be carried out in any residential area without detriment to the amenity of that area.

27.07 Employment uses may also include certain sui generis uses (uses falling outside a specific use class) such as secondary materials, waste management and aggregates, utilities infrastructure, and wholesale markets, as detailed in Policy E4 part a of the London Plan.

The Haringey Context

27.08 Haringey is home to around 12,900 businesses that employ around 71,000 people. The Haringey Employment Land Study (2022) identified that the borough has 465,544 sqm of employment floorspace in the B use classes with approximately 990 separate office premises.

27.09 Haringey's land and premises for industry, logistics and services is proposed to be categorised into four categories:

- 1) **Strategic Industrial Locations (SIL)** – these are London's main reservoir of land for industrial, logistics and related uses. SILs are given strategic protection in the London Plan because they are critical to the effective functioning of London's economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.
- 2) **Locally Significant Industrial Sites (LSIS)** – these areas are locations that have particular local importance for industrial and related functions
- 3) **Local Employment Areas (LEA)** – these areas are predominantly employment areas, however also including a proportion of other uses (many of which are not strictly employment uses but nevertheless provide employment opportunities and contribute to the local economy).
- 4) **Non-designated Employment Sites** – the borough also has a range of non-designated employment sites which contain typically smaller and more isolated employment uses but nonetheless make an important contribution to the Haringey economy

- 27.10 The main employment nodes in Haringey are to the east and centre of the borough, where nearly all the Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas are located.
- 27.11 Offices constitute 15% of overall employment floorspace in the borough. In terms of existing offices, Estates Gazette data shows that 80% of the marketed office stock is second hand grade-B, which may limit the options and flexibility offered to potential businesses looking to invest in the borough.
- 27.12 Around 94% of businesses in the borough are micro-businesses employing up to ten people, which is a higher proportion than seen across Inner London and Outer London (88% and 93% respectively). This underlines the importance of catering to the needs of smaller businesses both now and in the future.
- 27.13 The local economy is highly diverse and characterised by a range of different types of economic activity. As with many Outer London boroughs, foundational sectors such as Retail, Health, Education and Accommodation & Food dominate the employment mix. Industrial sectors also play an important role, notably Wholesale, Manufacturing and Transport & Storage.
- 27.14 Higher-value and higher-wage office-based sectors, such as Professional, Scientific & Technical Activities, Information & Communication and Finance & Insurance, employ fewer people and do not play such a big role in Haringey.
- 27.15 The borough does, however, have important growing and/or specialised sectors that present opportunities for its future. These include Property, Wholesale and Arts, Entertainment & Recreation. Haringey also has some niche specialisms that are not captured in broad sector data - these include Fashion Manufacturing, Film, TV, Radio & Photography, Food Manufacturing and Music & Performing Arts.
- 27.16 Looking beyond the data, Haringey has a long tradition in highly skilled manufacturing and played an integral role in London's world-famous rag trade. This local specialism continues to the present day as demonstrated by Fashion Enter's Fashion Studio, the Florentia Clothing Village, Gina's factory, the Fashion Technology Academy and Albion Knitting Co located in the Harringay Warehouse Living District. The borough also has unique specialisms across the spectrum of creative production, from music production to crafts and making. There is a GLA designated Creative Enterprise Zone in South Tottenham which celebrates and builds on the borough's rich manufacturing and maker heritage, focussing primarily on supporting fashion, furniture and small-scale manufacturing industries.
- 27.17 Haringey has a relatively strong labour market with low levels of unemployment, but high rates of in work poverty; a combination of high cost of living and low/stagnant income/wages means an increase in the number of households with at least one adult in employment experiencing poverty.

- 27.18 Many residents are underemployed, in employment below their skill level. There is also a lack of good jobs. Recent trends include insecure zero-hour contracts, rise of the 'gig economy' and poor wages, 29% of employees in the borough are paid below the London Living Wage. A hollowing out of the London labour market has resulted in a significant fall in mid-skilled jobs, meaning residents have limited opportunities for progression.
- 27.19 There is a need to address unequal access to work. In London, Haringey has the fourth highest proportion of residents lacking key employment skills (8.7%). There are issues with residents and school leavers not being equipped with the high-level skills required by the labour market. Our high proportion of residents with no skills and those in low skilled jobs are most at risk of automation.
- 27.20 There is a marked disparity in employment and skills across the borough, following a similar pattern to overall levels of deprivation. There is a concentration of employment deprived areas to the east of the borough, whereas areas to the south west of the borough are amongst the least employment deprived in England. The prosperity of the west does however mask pockets of significant deprivation in otherwise high-income wards.
- 27.21 There are significantly more development opportunities in the east of the borough and so capturing opportunities through new development to address the employment and skills gap in this area is important.

Policy EI1: Inclusive and Resilient Economy

- A. The Council will work positively with stakeholders to create a fairer and greener local economy that builds on local creativity, and enables job creation, secures inward investment, creates better employment destinations and provides opportunities for residents to develop new skills.

- B. To meet the strategic demand for employment uses including 82,000sqm of net additional industrial and logistics floorspace and 12,000 sqm of net additional office floorspace the Council will safeguard Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Local Employment Areas (LEA) as set out on the Policies Map and support proposals for:
 - (1) the intensification of employment floorspace in designated employment areas
 - (2) an uplift in office floorspace within designated Metropolitan and District centres, particularly in Wood Green and Tottenham Hale
 - (3) the delivery of local scale light industrial and workspace uses in the borough's designated centres and identified high streets where this provides suitable environments for Small and Medium Sized Enterprises, particularly in the creative industries, and does not conflict with relevant Town Centre policies.

- C. To help build a more inclusive and resilient economy, proposals should:
 - (1) protect and enhance designated employment areas to ensure they continue to provide valuable space for businesses and jobs
 - (2) support an increase in the quantity of good jobs available to the borough's residents as well as education, skills and employment training opportunities
 - (3) deliver intensified and modernised employment floorspace including exploring delivery of multi-story industrial units
 - (4) facilitate the regeneration of underutilised sites, prioritising an uplift in employment floorspace and jobs
 - (5) promote flexible use of high-quality space for a range of different employment generating uses and, where appropriate, in accordance with the Haringey Workspace Design Guide
 - (6) provide affordable employment space in accordance with Policy EI4
 - (7) support carbon reduction through refurbishment and retrofit of existing employment floorspace and inclusion of renewable energy installations
 - (8) promote the development of green industries and jobs

27.22 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Maximises opportunities to secure investment in our communities and to increase the supply of good jobs for residents

A HEALTHY & SAFE PLACE

Supports the improvement of the local environment, particularly the enhancement of the borough's employment areas to make them more welcoming, hospitable and inclusive

A SUSTAINABLE & RESILIENT PLACE

Supporting a more sustainable built environment with employment buildings that are modern, energy efficient and fit for future needs and requirements

Supporting Text

- 27.23 This strategic policy aims to foster a resilient, inclusive, and sustainable economy in Haringey, reflecting the Council's commitment to creating a fairer and greener local economy. Haringey's unique cultural and creative industries are key economic assets. By focusing on these strengths, the policy aims to create a vibrant local economy that leverages the borough's existing creative talents to drive job creation and economic growth.
- 27.24 This policy designates and safeguards Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and Local Employment Areas (LEA) to ensure that Haringey has a stable supply of employment land and that there is land available to support the long-term growth of industrial businesses and related services in the borough.
- 27.25 Intensifying the use of the designated employment areas supports the clustering of related functions, enhancing efficiency and productivity. It also helps ensure the optimal use of land by accommodating more businesses and jobs within the same footprint. Protecting these sites from non-industrial uses preserves their role in supporting local economic activities and providing employment opportunities. Modernising employment sites will help meet contemporary business needs, supporting a range of industries from traditional manufacturing to innovative tech startups.

- 27.26** The provision of 82,000sqm of net industrial and logistics space as projected for in the Haringey Employment Land Study 2022 is essential for supporting Haringey's economic activities, particularly in sectors such as manufacturing, distribution, and storage. Meeting this need will help foster economic resilience and job creation.
- 27.27 The borough's employment areas contain a range of placemaking opportunities and in many cases these are in need of enhancement to provide a high-quality and inclusive local environment. Proposals will be required to respond positively to place-based visions and to secure wider benefits for local communities where appropriate.
- 27.28 Similarly the need for an additional 12,000 sqm of net additional office floorspace is critical for accommodating the growth of businesses, particularly in the knowledge economy and professional services sectors. Expanding office floorspace in key areas will attract new businesses and support existing ones, contributing to the borough's overall economic vitality. This is especially so in Wood Green and Tottenham Hale which are strategically important for office development due to their excellent transport links and existing business ecosystems. Focusing office development here and in other District Centres will create vibrant business districts that drive economic growth. Supporting office development in town centres leverages existing infrastructure and amenities, fostering synergies between commercial, retail, and residential uses. This holistic approach creates dynamic, multifunctional urban spaces that attract investment and talent.
- 27.29 Affordable employment space, workspaces and incubator hubs are essential for nurturing small and medium-sized enterprises (SMEs) and startups, which are critical drivers of innovation and economic diversification.
- 27.30 Encouraging businesses to adopt sustainable building practices aligns with Haringey's goal of becoming a net zero carbon borough by 2041. This approach not only mitigates environmental impact but also enhances the long-term viability and resilience of employment sites, particularly having regard to upcoming changes to leasing of commercial properties which requires an energy performance rating of at least B to be achieved. Therefore, support for the redevelopment or refurbishment of these types of units that fail to meet this threshold is important. Similarly, developing renewable energy projects and other green industries will position Haringey as a leader in the green economy, creating jobs and attracting investment in sustainable technologies and is identified as one target sector to grow in the Haringey Workspace Study 2022.
- 27.31 Adequate infrastructure, including transport, digital connectivity, and utilities, is crucial for the growth and development of businesses. Ensuring timely delivery of these services supports the operational needs of businesses and enhances their competitiveness and as such should be investigated and supported to coincide with the delivery of new floorspace. The Council's Infrastructure Delivery Plan 2024 outlines the requirements and strategy for new infrastructure across the borough.

- 27.32 Adhering to high-quality design standards ensures that new developments are attractive, functional, and contribute positively to the urban landscape. This approach promotes a professional and appealing environment for businesses and employees alike and can help secure better access by foot and cycle.
- 27.33 Providing residents with access to high-quality jobs and training opportunities is fundamental for economic inclusion. By fostering local talent and ensuring pathways to employment, the policy helps build a skilled and adaptable workforce.
- 27.34 The changing dynamics of retail present opportunities to repurpose vacant spaces for light industrial and creative uses. This adaptive reuse can rejuvenate high streets and support diverse economic activities.
- 27.35 Repurposing ground floors for employment uses where town centre retail is not viable supports the growth of SMEs and creative industries. This policy addresses the changing dynamics of high streets, providing affordable and flexible workspaces that are essential for innovation and economic diversity.

Policy EI2: Designated Employment Land

- A. Within designated employment areas, proposals for the intensification, renewal and modernisation of employment land and floorspace will be supported where the development is for B2 (general industrial), B8 (storage or distribution), E(g) (ii) Research and Development E(g) (iii) industrial processes, ancillary E(g) (i) office and appropriate sui generis uses and the proposal:
- (1) delivers an uplift in floorspace and jobs potential on the site, and has explored opportunities for further intensification with neighbouring land parcels where appropriate
 - (2) makes a demonstrable improvement in the use of the site for employment purposes, having regard to the density of jobs to be accommodated on-site and the proposal's contribution to the achievement of economic objectives and outcomes set out in Policy EI1;
 - (3) is designed to allow for future flexibility of use including subdivision and/or amalgamation to provide for a range of business types and sizes, including small businesses unless this would compromise a secured use for the floorspace;
 - (4) makes adequate provision of space for on-site servicing and waiting goods vehicles;
 - (5) improves and enhances the quality of the environment of the site and wider business area including public realm, access by foot and cycle, wayfinding and delivers any relevant placemaking focus area objectives; and
 - (6) ensures appropriate action is taken in relation to any existing businesses on the site including engaging with them at an early stage, seeking to retain them on site where desired and possible, implementing effective transitional arrangements and providing support for any businesses that cannot be incorporated to relocate off site.
- B. Proposals for more intensive, noisy, dust generating or heavier industrial processes should prioritise sites in Strategic Industrial Locations which are not adjacent to existing residential areas.
- C. Small scale food and drink and leisure uses which meet the day-to-day needs of workers and do not adversely affect the industrial status or operation of an employment area will be supported.
- D. Proposals for drinking establishments including brewery tap rooms, nightclubs and venues for live music / culture will be supported where they do not adversely affect the industrial status or operation of the employment area, and safe pedestrian access and improved public realm is secured.
- E. Proposals which result in a net loss of light and general industrial, storage and distribution, research and development and related sui generis floorspace on any designated employment land will be refused.

- F. Proposals for uses not specified above and excluding all forms of residential will only be permitted where the following can be demonstrated:
 - (1) The proposal is necessary to facilitate meeting the needs of an existing industry or business on site; or
 - (2) The proposal is a use which supports the continued functioning of the employment land as a predominantly industrial and business area.
- G. Proposals for residential development on Strategic Industrial Locations will be refused. Proposals for residential development on Locally Significant Industrial Sites and Local Employment Areas will be refused except where a site is designated as existing warehouse living or where a site allocation specifically identifies an opportunity for co-location as part of a masterplanned and co-ordinated approach consistent with Policy E7 of the London Plan.
- H. Proposals within or adjacent to designated employment land should not compromise the integrity or effectiveness of these locations in accommodating industrial type activities and their ability to operate on a 24-hour basis.

Supporting Text

- 27.36 The policy sets out the types of uses and development that the Council will support in designated employment areas to meet the borough's identified economic needs.
- 27.37 The borough's stock of designated employment land comprising Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS), and Local Employment Areas (LEAs) is integral to the area's economy. The policy therefore promotes and protects employment land for industrial-type activities as well as storage and distribution and research and development. Where ancillary in scale and function, offices uses are also supported to allow for a diverse range of businesses. However, these must be compatible with the industrial function of employment land, and not compromise the ability of businesses to carry out intensive, industrial activities.
- 27.38 Given the significant demand for employment land within the borough, the introduction of non-employment uses, including residential is typically not appropriate within these areas, as it will undermine the strategy for meeting employment needs including through employment intensification. Protecting these sites from non-industrial uses preserves their role in supporting local economic activities and providing employment opportunities and focusing them as the locations for employment related investment will enhance the borough's economic resilience, attract investment, and create a diverse range of employment opportunities for residents. The Council considers that residential uses are generally incompatible in employment areas due to the types of uses that operate in these locations and the

high risk they obstruct the successful operation of an employment area. The only exception to this is within designated Warehouse Living areas where existing residential uses are established or on sites immediately adjacent where site allocations provide for new residential alongside an uplift in employment floorspace and are considered appropriate having regard to the already established change in character and use.

- 27.39 The borough does not have significant areas of brownfield land suitable for new employment floorspace designations. Existing employment areas will therefore need to accommodate intensified uses. Intensifying the use of these areas supports the clustering of related functions, enhancing efficiency and productivity. It also helps ensure the optimal use of land by accommodate more businesses and jobs within the same footprint.
- 27.40 Development proposals which seek to intensify industrial and logistics uses will be supported in principle. The Haringey Employment Land Study (2022) identified that the North Tottenham SILs have the most potential to provide intensified space and reduce the need to rely on new land to meet economic needs. This is because they contain typically larger sites which offer the most scope for accommodating intensive formats. The Council encourages developers to work with it to formulate schemes which can deliver substantial increases in floorspace, especially where site wide masterplanning may be required.
- 27.41 All intensification proposals should actively explore scope for vertical extension and maximise the employment development potential of sites. Proposals must align with the London Plan and associated guidance, such as the Mayor of London's Industrial intensification and co-location through plan-led and masterplan approaches practice note, noting that intensification and co-location with residential is only appropriate in LSIS and LEAs where allocated in a site allocation or where it is also a designated Warehouse Living Area. The Site Allocations within this Regulation 18 Preferred Option Local Plan that are identified for potential co-location within LSIS and LEA designations are subject to further detailed studies and Masterplanning by the Council, and any final land suitable for co-location will be confirmed in the submission Local Plan. The Mayor of London's Intensification Primer can helpfully signpost promoters to the types of intensified formats that the Council, in applying London Plan Policy E7, would expect promoters to explore.
- 27.42 A range of uses not falling within a specific use class (known as sui generis uses) which are also appropriate in SIL, LSIS and LEAs including hiring, selling and/or displaying motor vehicles, scrap yards, or a yard for the storage/distribution of minerals and/or the breaking of motor vehicles, and retail warehouse clubs. Where amenity impacts can be managed such as through noise and odour controls for adjacent occupiers, SIL is the most appropriate location for uses that may produce higher levels of noise, odour, or are for heavier industrial purposes including waste management. Policies on waste management are contained within the North London Waste Plan.

- 27.43 Drinking establishments, nightclubs and venues for live music and cultural events will also be considered appropriate in SIL, LSIS and LEAs where amenity impacts are deemed acceptable (including noise affecting adjacent sensitive receptors such as homes and schools) and where such uses do not impact on the proper functioning of the employment land, and safe and secure access for pedestrians can be secured. This reflects the growing trend of certain types of employment floorspace becoming multi-functional such as breweries with ancillary tap rooms, studios having performance spaces, and creative workspaces incorporating cafes or galleries which can aid the successful operation of the industries operating there.
- 27.44 The Council's Workspace Study (2022) provides guidance on how best to intensify space setting out what type of intensified formats may be suitable in the Haringey context and where intensification may be most viable and deliverable.
- 27.45 Proposals to improve environmental quality and make employment areas more attractive and competitive to businesses are strongly supported. Proposals should take opportunities to incorporate better greening and active travel to create thriving business hubs. Proposals should explore improved links to blue and green networks, and use biophilic design principles (such as planting, trees and green roofs) to link employment areas into wider networks.
- 27.46 Improved amenities for workers, including places for employees to eat and drink and nursery/creche facilities, as well as active travel infrastructure, should also form part of redevelopment proposals and will be supported.

Policy EI3 Non-Designated Employment Sites

- A. On non-designated employment sites proposals for the redevelopment of employment floorspace will be supported where:
 - (1) high-quality employment floorspace of equivalent or greater quantum is secured, including as part of a mixed-use development
 - (2) the proposal is informed by engagement with existing businesses to seek to retain them on site where desired by the business
 - (3) redevelopment will not compromise the function, access, servicing or operation of any remaining or neighbouring employment uses.
- B. Affordable employment space will be required in accordance with Policy EI4
- C. Proposals that result in a net loss of employment floorspace will be refused unless accompanied with evidence that demonstrates:
 - (1) there is no current or future market demand for the site as evidenced through a period of at least 12 months of active marketing for employment uses at realistic market rates
 - (2) efforts have been made to accommodate employment floorspace as part of any redevelopment scheme and that provision of replacement employment space has been maximised
 - (3) there is a positive strategy in place to support the relocation of existing businesses where these cannot be accommodated within the redeveloped site.

Supporting Text

- 27.47 Non designated employment sites are usually smaller areas with a single or a small cluster of employment premises. These sites accommodate a variety of small and medium sized businesses including many, such as garages, small industrial/workspace units and motor repair, that residents value in their local communities, close to where they live. However, not all non-designated employment sites are ideally located and many are in need of renewal.
- 27.48 This approach to non-designated employment sites is designed to ensure the borough can adapt to changing economic circumstances while safeguarding our employment base. This policy provides a flexible framework that encourages redevelopment while protecting essential employment functions. By requiring that redevelopment projects include an equivalent or greater amount of employment floorspace, the policy ensures that we maintain our capacity to support business activities and employment opportunities. This approach balances the need for new development with the preservation of economic capacity. Mixed-use developments that include employment floorspace can also enhance a place's vibrancy and sustainability, creating spaces where people can live, work, and play.

- 27.49 Engaging with existing businesses during the redevelopment process ensures that their needs and preferences are considered. This can help retain businesses on-site, preserving jobs and local economic activity. By prioritising the desires of current businesses, the policy fosters a business-friendly environment that supports continuity and stability.
- 27.50 Ensuring a continued supply of affordable workspace is crucial for supporting SMEs and start-ups as well as securing alternative premises for businesses that may have to vacate, who were reliant on cheaper, lower quality, lower density premises and would no longer be able to afford to remain in the area at market rates for new build premises. Additionally requiring a strategy for relocating businesses that cannot be accommodated in the redevelopment ensures that these businesses are not left without viable alternatives. This provision helps minimise disruption and supports the local economy by retaining businesses within the borough.
- 27.51 Proposals resulting in a net loss of employment floorspace will only be considered if there is clear evidence of a lack of demand. A minimum of 12 months of pro-active professional marketing in relevant publications and with suitable marketing material demonstrating best efforts including use of commercial agents have been made, and at realistic market rates and terms (based on an analysis of similar employment floorspace rates, terms and conditions being achieved locally) to ensure that redevelopment with a loss is only justified by market conditions.
- 27.52 Ensuring that redevelopment does not compromise the operation of remaining or neighbouring employment uses is critical for maintaining the functionality and efficiency of employment sites. This protection safeguards the operational integrity of businesses that rely on these sites.
- 27.53 It is also important that efforts to include employment space in redevelopment schemes maximise the amount that is delivered, even if there is a net loss to ensure that every opportunity is taken to maintain or increase the borough's employment capacity, even as sites are redeveloped for other uses, in light of the known significant demand for employment floorspace from the Haringey Employment Land Study 2022.
- 27.54 Applicants will be required to submit a viability assessment that clearly demonstrates that the proposed scheme maximises the development of employment uses and delivers the required affordable employment space component.

Policy EI4: Affordable Employment Space

- A. Proposals comprising over 1,000 sq. m. gross internal area of Office Class E(g)(i), Research and Development Class E(g)(ii), Industrial Processes E(g)(iii), and General Industrial B2 space (individually or combined) must, subject to viability, provide:
 - (1) for Class E(g)(i) space, at least 10% of the gross internal area as affordable employment space.
 - (2) For Class E(g)(ii), E(g)(iii) or Class B2 space, at least 20% of the gross internal area as affordable employment space.
- B. Average fees payable by end users in affordable workspace should not be more than 60% of 'Open Market Rates' for Office Class E(g)(i) and should be a target of 20% but no more than 40% of 'Open Market Rates' for Class E(g)(ii), E(g)(iii) and B2 of comparable spaces available with similar terms and conditions in the local area. Service charges should be kept to a minimum so that the space can be as affordable as possible to end users.
- C. Affordable employment space should be provided on the development for the maximum period viable, with a minimum of 25 years sought for Office Class E(g)(i), Research and Development Class E(g)(ii), Industrial Processes E(g)(iii), or General Industrial Class B2.
- D. Affordable employment space should be delivered on-site wherever possible. It should be of the same use class as the development that triggers the requirement. The Council may accept other use classes of affordable employment space where the need for the use is noted in the Haringey Affordable Workspace Study 2022 and there is a robust justification for that use as an alternative. The provision may be a part of the demise of a larger flexible workspace, or within its own demise.
- E. Affordable employment space provision should be marketed in the first instance to local businesses with a trading address in Haringey or adjacent boroughs for at least 6 months prior to tenancy/membership at the workspace.
- F. The Council will require evidence the affordable employment space provision will be satisfactorily managed whether by the developer or a dedicated workspace provider. If the workspace provider is not the developer, the developer should secure a lease or management agreement (such as a revenue share agreement) with the workspace provider that will enable the provider to deliver the workspace in a viable way. Furthermore, the rental rate from the developer to the workspace provider should be sufficiently low, such as peppercorn, to enable the workspace provider to viably facilitate the use of the affordable workspace by end users.

- G. The developer should fit out the affordable employment space to Category A or B in accordance with the Haringey Workspace Study 2022 and it should be made available for occupation by the workspace provider alongside occupation of any other commercial space
- H. The Council will accept payments in lieu for off-site provision of affordable employment space only in the following circumstances:
 - (1) Where the site is not within an area designated as employment land
 - (2) Where the on-site affordable employment space would be smaller than 150 sqm
 - (3) Where it can be demonstrated that on-site provision is not feasible and viable and off-site provision would result in an improved outcome for the supply of affordable employment workspace.
- I. The Council's affordable employment space payment in lieu calculator must be used to calculate any payment.
- J. Viability modelling for developments with affordable workspace should assume peppercorn or a low rent to workspace providers.
- K. Affordable workspace should have suitable hours of use for its use, which might be 24 hours a day use for certain end users.

Supporting Text

- 27.55 Affordable employment space (commonly referred to as affordable workspace) generally refers to multi-occupied office, light-industrial and industrial buildings, often managed by a "workspace provider". They typically divide properties into smaller units for small businesses, with flexible tenures and accessible price points, alongside nurturing of their tenant (or "member") community, facilitating of social value and provision of business support.
- 27.56 In recent years the cost of hiring workspace has increased substantially across London. This has largely been driven by long-term losses of employment land and an increasing mismatch between supply and demand. Until recently Haringey has continued to have a reasonable choice of cheaper workspace by virtue of many buildings being older/aging and commanding lower rents than newer/purpose-built space. However, as the number of employment sites in the borough being redeveloped increases, lower-cost workspace is being steadily replaced with more expensive workspace albeit of a higher-quality and more flexible and fit-for-purpose. This new workspace is often too costly for many of the borough's businesses and there is a growing risk these leave the borough or cease trading as a result.
- 27.57 Workspace has many benefits for the borough helping support a thriving, resilient and inclusive economy, generating jobs, career and skills opportunities for residents, and placemaking. The policy recognises this and therefore seeks to expand it to support, grow, and attract business activity, and provide affordable workspace for businesses.

Affordable workspace can be helpful for many types of businesses including non-profits who may be displaced by redevelopment, and be unable to afford to relocate into newer premises or businesses that provide a cultural or social contribution but are unable to afford workspace on the open market. Affordable workspace can be particularly essential for those moving from working at home in start-up businesses ahead of taking on an office on the open market.

27.58 London Plan Policy E3 supports the provision of affordable workspace. This policy aligns with the London Plan and seeks affordable employment space in a Haringey context. The policy directs landowners and developers to include specific forms of employment space that meet the needs of priority sectors (identified in the Haringey Workspace Study 2022). Affordable employment space should broadly be office (Class E(g)(i)), light industrial (Class E(g)(ii), E(g)(iii)) or industrial space (Class B2). It can be used as a flexible workspace with multiple organisations, or for smaller affordable workspace as a conventionally leased space to a single or a small number of organisations. The policy prioritises integrated and well-designed workspace in mixed use buildings or as standalone buildings.

27.59 The policy defines affordable employment space as space where average fees payable by end users are:

- no more than 60% of ‘Open Market Rates’ for Class E(g)(i) Offices; and
- no more than 20% of ‘Open Market Rates’ for Class E(g)(ii) Research and Development, E(g)(iii) Industrial Processes and B2 general industrial of comparable spaces available with similar terms and conditions in the local area.

27.60 Average fees are taken as either:

1. Net Rent (Rent excluding service charge, utilities, business rates); or
2. an all inclusive membership with monthly fee per person

27.61 ‘Open Market Rates’ are the open market rental rate exclusive of service charge, utilities and business rates (net rent), or open market all inclusive-fees rate (gross rent). Rates should be established when a workspace provider commences operation. To support the financial sustainability of affordable workspace it will be acceptable for fees payable by the end users to be upward only provided this is annually tracked to the Retail Price Index (RPI).

27.62 End user focus should be clearly defined for affordable workspace, with accompanied end user selection and support activities. End user focus could include: 1. specific sectors that have social value such as charities, voluntary and community organisations or social enterprises; 2. specific sectors that have cultural value such as creative and artists’ workspace, rehearsal and performance space and makerspace; 3. disadvantaged groups starting up in any sector; 4. supporting educational outcomes through connections to schools, colleges or higher education

where the use aligns with the affordable workspace planning use class; and, 5. supporting start-up and early stage businesses or regeneration.

27.63 In all cases, it's recognised that all end users have the potential to demonstrate wider social value via employment and skills, and this should be supported and enabled by the workspace provider of the affordable workspace.

27.64 In general, sectors targeted for affordable employment space should be guided by the Haringey Workspace Study 2022's recommendations by sector and area. The affordable workspace 'typology' should be fit for purpose for the sector focus as set out in the table below, with definitions and design considerations set out in the Haringey Workspace Study 2022:

Sector	Affordable workspace 'typology'						
	Co-working / serviced office	Managed workspace	Incubators/ accelerators	Creative studios	Maker facilities	Flexible kitchens	Flexible labs.
Film, TV and photography	x	x	x	x			
Food production and manufacturing						x	
Professional, scientific and technical activities	x	x	x				x
Fashion manufacturing				x	x		
Music, performance and visual art	x	x	x	x	x		
Tech and digital production	x	x	x	x	x		

- 27.65 The affordable employment space should be managed by a 'workspace provider' who can demonstrate their intention and means to deliver the affordable workspace and can be the developer or a workspace provider. The Haringey Affordable Workspace Provider Network is a list of workspace providers published on the Council's website who are seeking to expand or move to the borough and operate workspace including workspace with affordable workspace planning obligations. Developers who want to add a workspace provider to the list should approach the Council.
- 27.66 Reasonable consideration should be made to eligible end users being able to secure small business rates relief. This may involve supporting them to demonstrate sufficient control and permanency for this purpose.
- 27.67 Deposits from end users should be minimal, and no more than 2-months of fees. Flexible tenure should be provided to end users such as one to three months rolling breaks after a reasonable initial period. Consideration should be made to ensuring size of private offices and studios are not larger than reasonably required by target end users, again to ensure the space is as affordable as possible.
- 27.68 If the workspace provider is not the developer, the length of the lease or management agreement should be sufficiently long with sufficient rights of tenure to ensure any investment by the workspace provider can be recouped and to maximise outcomes. If a lease exists between the developer and a workspace provider, the lease period should be for at least 10 years from the commencement of operation of the affordable workspace upon it being available for occupation. In circumstances where a lease or management agreement comes to an end during the obligation period, the developer should extend or renew the lease or management agreement or find an alternative provider until at least the obligation period has passed.

- 27.69 Affordable workspace should be marketed and made attractive and accessible to residents and local businesses. If the workspace provider is not the developer, marketing of the affordable workspace should be undertaken with best endeavours to make the opportunity as attractive as possible to the workspace provider. This might include offering other space at the development for the workspace provider to manage in addition to the workspace.
- 27.70 If the workspace provider is not the developer, developers should find, select and involve a workspace provider in the affordable workspace proposal early in the planning process, and ideally prior to submitting the development's planning application.
- 27.71 Regarding circumstances where a developer wishes to demonstrate that it is not feasible to have affordable workspace on their site due to lack of market demand, the developer would be required to show they have used best efforts to generate interest from workspace providers and/or businesses that would directly let the affordable workspace from the developer. This would include (but not be limited to) contacting a range of workspace providers in and outside of the borough, and the commercial terms being as appealing as possible and as per the policy requirements.
- 27.72 The affordable workspace should be designed, fitted out and located within the development to be attractive and fit for purpose for target sector/s and in accordance with the Haringey Workspace Design Guide 2023), end users, and the affordable workspace 'typology'. This includes (but is not limited to) generous floor to ceiling heights, good natural light, minimal supporting columns, minimal plumbing/servicing intrusion, a visible and attractive entrance, and flexibility for adaptation.
- 27.73 The affordable workspace should ideally be located in a single area on the site to provide a critical mass of dedicated space that can be efficiently managed and provide clustering benefits for end-users, although spreading the affordable workspace across the site would be allowed if rationale is provided to the Council's satisfaction.
- 27.74 Shell and core includes the structure, cladding, base plant, completed common areas (receptions, lobbies, lifts, stairwells, toilets) and external works. Category A fit out includes elements such as raised floors, suspended ceilings or equivalent, basic mechanical and electrical services (air condition, lighting, controls), basic fire detection / protection systems, general decoration to perimeter walls. Category B fit out includes elements such as installation of partitions, carpeting, finishes and branding, kitchen facilities, breakout and reception areas, office furniture, IT and audio equipment, specialised lighting, branding, meeting room and cellular office units.
- 27.75 An Operation Management Plan should be agreed between the developer, workspace provider and the Council at the time of executing a Section 106 agreement. This would detail all operational elements including management, business support, social

value activities, community benefits and how the end users could create wider social value via creating employment and skills opportunities.

- 27.76 The workspace provider should provide annual updates to the Council on activity and affordability, to monitor the benefits of the scheme and inform future business support.
- 27.77 In Local Employment Areas where robust viability evidence is provided to show that affordable employment space and affordable housing cannot both be fully delivered, the delivery of affordable workspace will be given precedence.

Policy EI5: Employment, Skills Development, and Local Business Growth

Threshold

- A. Major residential and commercial developments and developments which result in a net loss of existing employment floorspace will be required to deliver employment, training, apprenticeships, work experience and business growth opportunities.
- B. Applicants for such development will be required to commit to an Employment, Skills and Business Plan (ESBP) agreement with the Council to require that:
 - (1) a minimum of 20% of all jobs created during the development's construction phase and for the first two years of the end use phase of the development are made available to local residents via the Council's jobs portals and that these jobs are for a minimum of 26 weeks and paid at London Living Wage (as set by the Living Wage Foundation) or above. In relation to the above, the developer should
 - a provide a minimum 5% supported employment opportunities for priority groups.
 - b provide minimum of 20% skills development and training opportunities to support unemployed local residents transition into good work.
 - c provide a minimum of 1 new apprenticeship or NVQ at a minimum of level 2 qualifications per every £3 million of construction value or the equivalent number if a shared apprenticeship model is offered. The developer will be expected to support training and release arrangements until completion of an apprenticeship standard qualification, pay apprentices at the London Living Wage or above and pay a £1,700 support fee per apprentice to the Council
 - d where the development involves construction contracts in excess of £5 million, seek construction tenders from local Haringey suppliers for at least 10% of the total value of contracts.
 - (2) They partner with the Council, educational providers and/or local organisations to create, deliver, support, and sponsor programmes, which actively (and innovatively) promote the variety of career options and opportunities available across the development, construction, end use phase and within the wider built environment sector.
- C. In addition to the obligations above, major development proposals will be required to make financial contributions to help support initiatives to enable residents who experience barriers into employment and/or with low levels of skills; and priority groups, access newly created opportunities arising from the developments within Haringey. The approach to calculating these financial contributions is set out in the Council's employment and skills calculator.

- D. ESBP delivery will be monitored to check compliance. Once development has commenced, the developers will be required to submit monitoring reports to the Council every 3 months in relation to the implementation of their ESBP.
- E. A Section 106 agreement will set out the detailed arrangements for the timing of payments of planning obligations relating to employment, skills training, and business growth. Completed planning agreements will also provide for a monitoring fee linked to the overall package of obligations.
- F. If the Council determines that the ESBP has not been delivered, or there are obligations which for exceptional circumstances cannot be met, then the Council will require an offset charge to be paid in accordance with the Haringey Employment and Skills calculation methodology.

Supporting Text

- 27.78 Promoting 'Good Work' at the London Living Wage rate with opportunities for progression is one of the key priorities for the Council. This is outlined in Opportunity Haringey, the Council's Inclusive Economy Framework, and the Council seeks to use its full range of powers, including via planning, to support this objective. Policy E11 of the London Plan sets out that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate.
- 27.79 Creating and promoting employment, skills training and enterprise opportunities for local people ensures that local investment delivers economic benefits for residents. Focusing employment support and training on those most disadvantaged in the job market is key to addressing inequalities in the borough, maximising social value, and promoting an inclusive economy.
- 27.80 Haringey is experiencing a disproportionately high rise in unemployment, and Tottenham has the highest rise in the number of people claiming Universal Credit for unemployment. Amongst this borough wide impact, our young people are experiencing the worst of the economic fallout from the economic shocks of recent years.
- 27.81 Figures for our young people who are Not in Education, Employment or Training (NEET) have been substantially improved over the last year with targeted work by Early Help services. However, we still have a larger proportion whose activity is unknown suggesting larger proportions who are NEET than accounted for in the wider population. Haringey has a larger proportion of Asian and Black/Black British/Mixed Race 16–17-year-olds who are NEET compared to the London average.

27.82 Amongst these young people, there are numerous inequalities related to employment outcomes, all which risk being widened as a result of economic pressures.

- Men in all youth age groups, across all wards in Haringey, have experienced the highest employment fall and are overrepresented in unemployment benefit claims.
- Only 4.3% of young people with a learning disability are in paid employment.
- Care leavers are overrepresented in those most economically impacted and in Haringey over half are children from minority ethnic communities.

27.83 The Council will use its planning powers to require economic and employment benefits for local residents and businesses. We aim to support a local inclusive economy where businesses thrive and where development creates quality employment and skills opportunities for local residents.

27.84 Developments in Haringey offer significant opportunities across both traditional and modern construction methods. The sector offers opportunity for career progression and upskilling across a wide range of construction and built environment roles. The Council seeks to support residents into such jobs ensuring that good quality job opportunities and career paths are available to them. Achieving targets for local employment and training will be supported by a focus on apprenticeships, and backed by employment support and brokerage through Haringey Works, training and employer engagement. This will also include supporting residents to set up their own business as a route to employment.

27.85 All major developments will be required to produce a site-specific Employment Skills and Business Plan (ESBP) which must be approved by the Council three months prior to commencement of development and should include details of how performance is to be monitored and reported. The ESBP should be produced by both the developer and their main contractor working together and agree to deliver the commitments secured and be in accordance with Opportunity Haringey.

27.86 Developers are encouraged to contact the Council's Inclusive Economy Service at the pre-application stage to discuss the development of the ESBP. Developers are also expected to meet with the job brokerage service, Haringey Works, prior to commencement to discuss employment and skills training needs, highlighting any shortages.

27.87 Funding to deliver activities agreed in the ESBP will be the responsibility of the developer and/ or their main contractor.

27.88 The ESBP should as a minimum include the following:

- Description of development and estimated duration of the development
- Method statement setting out detail of proposed employment, skills, and business growth initiatives and how this will be delivered,

- Provide a named contact(s) within the organisation who will be responsible for implementing the provisions within the ESBP, including how they will ensure (sub)contractor compliance, engage with the Council, and key local organisation partners to meet the commitments
- Forecast of the estimated FTE workforce, number and types of vacancies, timescale and the monthly target breakdown of opportunities that will be created for local residents across the full life cycle of the development including the construction phase and end-use phases. This can be done with a project labour and local opportunities histogram for each phase of the development
- Procurement schedule and a list of work packages being offered to competitive tender for the developer and all sub-contractors, including timeframes, values of packages and framework requirements,
- Construction programmes
- Any supporting documents such as corporate social responsibility and social value policies.

27.89 The above will enable the Council to prepare residents for upcoming opportunities for the full life cycle of the development phases.

27.90 It is expected that the developer (and the main contractor) will work positively and proactively with the Council's Inclusive Economy Service or its nominated agent and use all reasonable endeavours to achieve the 20% sustainable local labour requirement. The ESBP should address in detail how this and the other policy requirements are to be delivered.

27.91 One new apprenticeship should be provided for every £3 million of the construction value (to be verified through viability assessments where submitted in support of an application).

27.92 The Council will work closely with the developer/main contractor to promote higher level apprenticeships, above level 3. For every 5 apprenticeships, 1 must be above level 3, and opportunities should be explored within green skills or digital technology related work. Developers/main contractors should source apprentices from Haringey Works.

27.93 Of the 20% sustainable local labour requirements, 5% must be supported employment opportunities (paid internship and or industrial placement) lasting a minimum of 26 weeks, for priority groups, as determined by the Council. Developers should source interns/industrial placements via the Council's Inclusive Economy Service.

27.94 Of the 20% sustainable local labour requirements, developers/main contractors are required to deliver 20% skills training for Haringey priority groups that will provide them with the competencies, experience, and qualifications to access the jobs that are being created by the development and consisting of work placement and guaranteed interviews for suitably qualified residents in relation to planned vacancies.

These skills training opportunities must be earmarked for priority groups and nominated by the Council (or another agency as agreed by the Council).

- 27.95 To support developers/main contractors to meet the ESBP obligations, we require the opportunities associated with the development (including construction and the end use phases) to be advertised to the Council's employment brokerage services (Haringey Works) and any other local partners nominated by the Council. These will ensure that all jobs, apprenticeships, training opportunities and work-related activities earmarked for local residents are communicated to all local employment routes and partner agencies across the borough. Further guidance and the Council's Employment and Skills Calculator can be found at www.haringey.gov.uk/newlocalplan

Policy EI6: Contaminated Land

- A. Development proposals that aim to remediate and bring contaminated sites into beneficial use will be supported.
- B. Development proposals must thoroughly address any risks associated with land contamination, including potential hazards to human health, public safety, and the environment, ensuring the safety of the development. Where land has potential to be contaminated, or if a sensitive use is proposed, the following steps will be required:
 - (3) Preliminary Risk Assessment (Phase 1 Study): Applicants must submit a Preliminary Risk Assessment (Phase 1 Study) to identify and evaluate the level and risks of contamination on the site and adjacent land.
 - (4) Site Intrusive Investigation (Phase 2 Study): Where necessary, a Site Intrusive Investigation (Phase 2 Study) must be conducted to provide a detailed assessment of contamination and risks to all receptors.
 - (5) Risk Management and Remediation Strategy: A site-specific Risk Management and Remediation Strategy, appropriate to the individual circumstances, must be prepared to address any identified contamination risks effectively.
 - (6) Verification Plan and Closure Report: Prior to occupation of the development, applicants must submit a Verification Plan and Closure Report to demonstrate that the remediation measures have been successfully implemented and the site is safe.
- C. Development proposals involving the storage or use of hazardous substances or the redevelopment of a site in the vicinity of a hazardous installation will only be permitted if it can be demonstrated that appropriate safeguards are in place to prevent any unacceptable risks to human health, public safety, and the environment.
- D. Planning conditions may be imposed to ensure that remedial measures are implemented and the development is deemed safe before occupation.

Supporting Text

Contaminated Land Statutory Guidance (CLSG) (2012) provides detailed information on the legislative framework for contaminated land in England to which this policy aligns by emphasising the need for risk assessments, remediation strategies, and verification plans. Additionally, the Environment Agency's Land Contamination Risk Management (LCRM) (2020) provides guidance on assessing and managing land contamination risks and this policy incorporates the key principles outlined in the LCRM, including the importance of risk assessments and site-specific remediation strategies.

The policy aligns with the NPPFs emphasis on addressing contamination risks, implementing appropriate safeguards, and utilising planning conditions to ensure safe development. This policy also supports and aligns with the Council's Contaminated Land Strategy, which outlines our approach to dealing with contaminated land.

The Draft Local Plan has had regard to relevant directives and regulations relating to the control of major accident hazards involving dangerous substances.

Waste Capacity

Policies to manage new waste facilities and safeguarded waste sites are contained within the North London Waste Plan. Policies to manage waste and storage requirements from residential and commercial development are contained in Design policy D12.

28. Town Centres, High Streets and Shops

Introduction

28.01 Town centres and high streets are the heart of our communities. They create a unique sense of identity and character for Haringey and contribute to all of the Placemaking Priorities of this Draft Local Plan including by:

- Providing a home for creativity and culture, whether at spectacular venues such as Hornsey Town Hall, or via the world-class Turkish food offer centred around Green Lanes and Wood Green
- Providing vibrant and inspiring places to live such as the transformed Tottenham Hale District Centre
- Accommodating social infrastructure such as Rising Green Youth Hub in Wood Green and acting as a hub for social and civic life
- Providing a range of employment spaces and employment opportunities to deliver an inclusive economy
- Enabling our communities to access the services and facilities they require to live healthy and happy

28.02 Town centres and high streets are fundamental to supporting the 15-minute city concept where everyone can access their daily needs within a 15-minute journey without the need for public/private transport. They also provide enormous opportunity for the delivery of new development which through a high-quality placemaking approach has the potential to enhance and celebrate our unique environments, histories, cultures, communities, and identities.

28.03 The NPPF and London Plan both require local planning authorities to plan positively for town centres to create sustainable and vibrant communities including the provision of adequate retail and other town centre uses that serve the needs of the community. The importance of protecting and enhancing existing town centres and promoting their vitality and viability is highlighted.

28.04 The NPPF prioritises town centre locations for retail and other main town centre uses such as offices, leisure, and community facilities. It also requires the Council to plan for a range of transport modes, including walking, cycling, and public transport, to support sustainable access to town centres.

28.05 Existing policy emphasises the importance of integrating new development into the existing fabric of town centres and promoting the creation of safe and attractive public spaces. Given the changing nature of how we live and how we shop, such as the growth of online shopping, it is important that town centres are able to adapt and change to meet local needs.

- 28.06 In recent years, significant changes have taken place to the Planning Use Classes Order. In 2020 the Government introduced a new Class E: 'Commercial, service and business class' which combined the former Use Classes A1-A3 (shops, cafes, restaurants and financial services), B1 (business), parts of D1 (health, crèches and nurseries) and parts of D2 (indoor sports and recreation) into the one new Use Class. Premises falling within Class E can change to any other use within Class E without the need for planning permission which means that the Council has lost a significant degree of control over changes of use in town centres and other places where such uses can commonly be found,
- 28.07 Haringey's existing Local Plan was adopted in 2017, and as is evident today, retailing and town centres are changing in response to recent trends and future forecasts for shopping habits, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet.
- 28.08 It is therefore necessary for the New Local Plan to assess the future demand and capacity for both comparison (clothes, electronics, mobile phones, accessories) and convenience (food, drink) goods retailing and plan proactively to accommodate that demand and manage the transition of surplus retail units to ensure our town centres continue to function and remain destinations of value to residents and businesses.
- 28.09 The Council also wants to ensure that everyone has shops, employment, social/community infrastructure that can be easily accessed within their local neighbourhood area or within a short journey. The Local Plan is being developed to help deliver the ambitions of Opportunity Haringey, the Council's Inclusive Economy Framework, notably the following Themes and Actions:

Theme 2 Investment	<ul style="list-style-type: none"> • Bring new investment to the borough • Develop the Visitor Economy
Theme 4 High Streets and Industrial Estates	<ul style="list-style-type: none"> • Encourage entrepreneurship through our vibrant local markets • Promote the vibrancy of our town centres, high streets and industrial estates
Theme 5 Works Places and Spaces	<ul style="list-style-type: none"> • Promote quality workspace provision • Encourage the delivery of additional workspace across the borough

The Haringey Context

28.10 Haringey has a hierarchy of designated town centres within the borough which play a diversity of roles and functions. They are categorised as follows:

- **Metropolitan Centres:** town centres with a focus on higher order comparison goods retailing (more expensive items not required so frequently which people are usually prepared to travel further to get such as furniture and electronic goods), with higher density employment opportunities, leisure and residential developments. Wood Green is the only Metropolitan Centre within Haringey.
- **District Centres:** town centres with a focus on a range of functions, particularly convenience, leisure, local employment and workspace. There are currently six District Centres in Haringey, and one which partly lies within Haringey and partly in other boroughs (Finsbury Park). This plan proposes a new District Centre in North Tottenham which will replace the current North Tottenham Local Shopping Centre and reflect proposed growth of town centres uses including leisure and cultural uses.
- **Local Shopping Centres:** these provide for the day-to-day needs of people living and working nearby. There are currently 38 of these centres in Haringey which is planned to reduce to 37 with the upgrade of North Tottenham Local Shopping Centre to a District Centre.

28.11 Haringey also has a range of undesignated high streets which are typically smaller than local shopping centres but also provide for needs of residents.

28.12 Haringey's town centres and high streets are generally performing well. There is strong demand for retail space in Haringey, reflected in the low vacancy rates across the borough and rising rental values. This goes against trends seen in lots of other locations where high streets have struggled against the rise of online shopping.

28.13 Town centres and high streets will continue to play an important role in supporting new commercial and residential development in the future. However, there are concerns within some town centres regarding safety, connectivity and cleanliness. A high proportion of all crime in Haringey takes place in its town centres. This largely consists of antisocial behaviour, shoplifting and theft.

28.14 As part of the development of the London Plan, the GLA undertook a review of the role and function of town centres across London. This highlighted that there was 'high' potential for commercial growth in the future, particularly highlighting opportunities at Tottenham Hale. The Council has also commissioned evidence on the need for future retail and leisure uses across the borough (Retail Needs and Town Centre Uses Study 2022), and the findings highlight a modest need for additional floorspace.

Policy TC1: Vibrant Town Centres and High Streets

- A. Haringey's Town Centre Network and identified high streets falling outside it, will be supported to meet the current and future needs of residents, workers and visitors.

- B. To enhance and sustain the role of Haringey's town centres and high streets as the heart of our communities and neighbourhoods, proposals should:
 - (1) direct main town centre uses within the defined boundaries of town centres in accordance with the National Planning Policy Framework 'Town Centre first' approach.
 - (2) contribute to a diverse range of uses to meet local needs, responding to the town centre hierarchy, and local character and strengths. This includes providing any identified necessary physical and social infrastructure.
 - (3) be of an appropriate scale and form having regard to the size, role and function of the centre and its catchment
 - (4) enable sustainable and safe access to local spaces, services, and activities by walking, wheeling, cycling and public transport, reducing private vehicle dominance.
 - (5) create, enhance, and positively manage spaces to provide a welcoming, inclusive, barrier-free, and safe environment for all our communities.
 - (6) create healthy places by curating and managing activities and spaces to support healthy activities and social integration, avoid overconcentration of activities with negative impacts, and foster a strong local identity and sense of community.
 - (7) enhance and celebrate culture and the local historic environment where relevant.
 - (8) provide active frontages and attractive shopfronts and appropriate signage (See policy D5).
 - (9) optimise the use of the public realm, sensitive lighting, and digital interaction.
 - (10) optimise the use and adaptability of town centre spaces; providing flexibility for meanwhile, nested, and ancillary uses, where appropriate, and being proactive in using vacant and under-used spaces.
 - (11) consider the potential for cultural and community space within developments.
 - (12) optimise the potential for residential and commercial uses above ground floor level through mixed-used development.
 - (13) contribute to enhanced green infrastructure.
 - (14) leverage the connectivity and critical mass offered by town centres to support sustainable servicing, deliveries, and the circular economy.

- C. For Major developments within town centre and edge of centre locations, the Placemaking Strategy required by Policy PM1 should set out how the proposal

supports Part B of this Policy as well as any published or emerging town centre strategies.

28.15 This policy contributes to the Haringey Placemaking objectives as follows:

A FAIR PLACE

Maximises opportunities to secure investment in our communities including new homes and employment uses to meet local need

Helps ensure sustainable and safe access to local spaces, services, and activities

Contributes to welcoming, inclusive, barrier-free, environments for all our communities

A HEALTHY & SAFE PLACE

Creates healthier and safer places to support healthy activities and social integration and avoid overconcentration of uses with negative impacts

A SUSTAINABLE & RESILIENT PLACE

Protects the vitality and viability of our town centres and high streets

Supports sustainable patterns of development which minimise need to travel and make best use of existing and planned infrastructure

Supporting Text

28.16 In a context where the Council has less planning power than ever before to control the exact mix of uses in the borough's town centres and on our high streets, it is considered that the best response to secure their continuing vibrancy and vitality is a strategic one. Accordingly, this Draft Local Plan contains a strategic policy to guide future development and change and ensure that investors in our town centres are clear what the Council and its communities desire to see be delivered. It is crucial that proposals respond to the unique characteristics of Haringey's places and related local opportunities. The Council has therefore developed specific place-based visions for the borough's town centres and high streets. These can be found in the neighbourhood sections of this plan and provide clear guidelines for future development and change that proposals will be required to respond positively to.

28.17 To ensure our centres remain attractive and commercially successful, it is important that they contain a diverse range of uses which meet need and provide choice. Therefore the existing mix of uses within a town centre will be considered when determining whether a proposal satisfies this policy requirement.

28.18 When considering whether a development is of an appropriate scale, consideration will be given to factors such as the size and amount of town centre floorspace being provided and where this is appropriate when considering the size, role and function

of the centre and its catchment in relation to the Town Centre Network set out in Annex 1 of the London Plan and Schedule 10 of this Plan.

- 28.19 Redevelopment provides an opportunity to improve the surrounding public realm, and also secure accessible places. This is crucial in ensuring all public spaces are inclusive and safe. Additionally, where redevelopment can help improve or encourage journeys by public transport, walking or cycling, these will be supported, given all of Haringey's town centres are considered to have good to excellent Public Transport Accessibility Levels, taking into account their likely catchments.
- 28.20 Active frontage uses in a town centre are those that bring activity to the street frontage through a flow of people entering and leaving the premises at ground floor level and a glazed façade through which activity can be seen from the street. This natural surveillance also has potential to discourage crime and antisocial behaviour. All Class E and Class F uses and appropriate sui generis uses such as beauty salons or nail bars, launderettes, nightclubs, cinemas, bingo halls, concert halls, dance halls, live music venues, public houses, wine bars and drinking establishments, hot food takeaways and theatres at ground floor will be expected to be designed to provide an active frontage. Mini-cab and private hire vehicle offices are considered appropriate sui generis uses within town centres.
- 28.21 The development of a high-quality environment is key to the safety, popularity and economic and social success of each centre and therefore the Draft Local Plan seeks to encourage and, where appropriate, require specific planning and design treatments to help achieve this.

Policy TC2: Town Centres First

- A. The Council will seek to meet the following town centre use floorspace needs to 2033 within designated centres in the Haringey Town Centre Network:
 - (1) Convenience goods retail 3,300 sqm gross
 - (2) Food/beverage uses 3,300 sqm gross
 - (3) Commercial leisure, entertainment and culture 5,000 sqm
- B. Main town centre uses must be directed to designated centres in the Town Centre Network first in accordance with the Sequential Test. Proposals must be of a scale and form appropriate to the size, role and function of the centre and its catchment. Accordingly, larger scale main town centre uses should be directed to Metropolitan or District Centres first as part of a hierarchical site selection process.
- C. If no sites can be found within designated centres in the Town Centre Network, or are not likely to become available, then appropriate edge-of-centre locations should be explored next.
- D. Development proposing a main town centre use in out-of-centre locations will be refused unless:
 - (1) provision has been made for these uses within a site allocation; or
 - (2) it is located on a high street identified by the Council in Schedule 10 and is proportionate in scale to the existing uses on the high street; or
 - (3) in the case of cultural uses, it is located within a designated Cultural Quarter; or
 - (4) it is clearly demonstrated that no suitable town or edge-of-centre sites are available or are expected to become available within a 12-month period.
- E. Where retail or leisure uses over 400 sqm gross (combined and including such uses within mixed-use development) are proposed either edge of centre or out of centre, and there is no site allocation for an equivalent quantum of such uses, then such proposals must be supported by a Retail and/or Leisure Impact Assessment.
- F. The Impact Assessment must demonstrate that:
 - (1) There is an identified need and market demand for the amount and type of floorspace proposed; and
 - (2) The proposal, either by itself or in combination with other existing, committed or planned development, will not adversely impact on the vitality and viability of Haringey's Town Centre Network.
 - (3) Proposals for new major Use Class E(a) retail development have prioritised Wood Green Metropolitan Centre in the site selection process before considering other appropriate locations, including District Centres.

Supporting Text

- 28.22 This policy seeks to enhance the role and function of the borough's Town Centre Network, and to ensure that the scale of development is appropriate to the size and function of the centre and its catchment. The Haringey Retail and Town Centre Needs Study (2022) confirms that the network of main and local centres should continue to be protected and enhanced to ensure appropriate accessibility to important facilities for all sections of the community and to ensure sustainable shopping patterns. Wood Green is the largest and dominant town centre in the borough, consistent with its designation as a Metropolitan Centre in the London Plan. The retail and food beverage floorspace capacity projections up to 2033 suggest nearly half of the projected growth should be provided in the northwest of the Borough, which will primarily be Wood Green.
- 28.23 London Plan Policy SD7 indicates development plans should define detailed boundaries for town centres. Designated town, district and local centre boundaries should be tightly drawn to assist in controlling the appropriate scale and nature of development. The relatively low floorspace capacity projections, the number of vacant shop units and assessment of potential development opportunity sites in centres suggest there is no need to extend the borough's centre boundaries to accommodate future growth other than minor amendments to incorporate units not currently captured in commercial or leisure uses. The floorspace projections suggest a short-term over-supply of retail floorspace and imply the contraction of some centre boundaries could be considered. However, longer term projections to 2033 and 2038 suggests significant contraction would not be appropriate. The boundaries of each centre on the Draft Local Plan Proposals Map reflect this recommendation.
- 28.24 The NPPF minimum threshold of 2,500 sqm gross for impact assessments is inappropriate for Haringey because this scale of development would exceed the overall long-term retail/food beverage/leisure projections for all zones in the Borough. A 400 sqm threshold is more locally appropriate, as recommended by the Haringey Retail and Town Centre Needs Study 2022 and this threshold should apply to retail and leisure uses combined, and combined floorspace across different phases of development.
- 28.25 The continued identification of town centre boundaries is important when applying the sequential approach which is a screening approach to ensure developers look at any available sites in nearby town centres first. Its purpose is to direct retail and other town centre uses to sustainable locations and determine whether a retail impact assessment is required. The NPPF continues to indicate that the first preference for retail and other town centre uses should be the Primary Shopping Areas for retail uses and the town centre boundary for other town centre uses. Town centres are therefore expected to be the focus for retail, leisure and other main town centre uses. All main town centre uses located outside or on the edge of designated Metropolitan, District and Local Centres or on undesignated high streets will be subject to the sequential test in accordance with the NPPF. The continued classification of centres as part of a

hierarchy is important to help direct new town centre development to the appropriate area.

- 28.26 The area of search for sequential sites (i.e. relevant centres) will depend on the scale, nature and location of the proposed town centre uses and the catchment area they are likely to serve and should be considered on a case-by-case basis.

Policy TC3: Town Centre Uses

- A. Proposals for main town centre uses (as defined in the National Planning Policy Framework) will be supported by the Council within designated centres in the Haringey Town Centre Network and on high streets identified by the Council provided that they are proportionate to the size and function of the centre or high street, help meet a local or borough-wide need or otherwise contribute to an inclusive economy and environment, and they contribute to the vitality and vibrancy of the location.
- B. Proposals for main town centre uses must provide a well-designed active frontage consistent with Policy D5. Proposals for additional main town centre uses above ground floor level are encouraged and will be supported where this does not lead to the loss of existing residential units.
- C. To support and enhance town centre vitality and viability, Primary Shopping Areas are identified within Haringey's Metropolitan and District Centres. New or replacement Class E(a) retail uses should be directed to Primary Shopping Areas within Haringey's Metropolitan and District Centres. Development proposals within a Primary Shopping Area should support the retail function of the Primary Shopping Area and not compromise clustering and/or concentration of retail use.
- D. Where necessary and justified, the council will use conditions and/or planning obligations to limit uses to Classes E (a) retail uses (b) food and drink (c) professional services within Primary Shopping Areas. Where development is conditioned to this effect, development proposals seeking a change to another appropriate main town centre use falling outside these sub-classes, including full flexibility for Class E commercial, business and service uses, must demonstrate that there is no reasonable prospect of the unit being used for continued retail use. This must be evidenced by a robust and recent marketing exercise covering a minimum continuous period of 12-months at a reasonable market value for rent or sale to the local area.
- E. Where a proposal includes a mix of commercial and residential uses, adequate, safe access arrangements must be provided for all building occupiers including separate secured access for the residential element that does not negatively impact upon the street frontage.
- F. Proposals affecting an existing commercial unit must ensure any ancillary floorspace that is integral to business operations and viability of the unit is not compromised or lost. The conversion or change of use of the upper floors, storage and yard facilities of existing commercial units will not be permitted where this would compromise the viability or future use of the remaining unit.
- G. Within designated centres in the Town Centre Network and on identified high streets, the loss of units in Commercial, Business and Service Uses (Class E) will be resisted except where:

- (1) The unit has been actively and independently marketed for the full range of Class E uses for at least 12 months and evidence is provided to show there is no realistic prospect of a continued Class E use;
- (2) In the case of retail, food and beverage or leisure uses over 400sqm gross, a retail and/or leisure Impact Assessment is provided which demonstrates that the loss of the floorspace will not impact on the vitality and viability of the centre or on the function of the centre within the network,
- (3) The development provides an alternative main town centre use, with well-designed active frontage that is in keeping with local character and consistent with policy D5.

H. Within designated centres in the Town Centre Network and on identified high streets, proposals for residential uses at ground floor level will be refused. For the purposes of permitted development, these locations comprise key shopping areas.

I. Within designated centres in the Town Centre Network and on undesignated high streets, proposals for meanwhile main town centre uses within vacant units will be supported.

Supporting Text

28.27 This policy aims to secure the vitality and viability of Haringey's Town Centre Network by accommodating local needs and managing wider trends as recommended by the Haringey Retail and Town Centre Uses Study (2022) and in line with the National Planning Policy Framework and the London Plan.

28.28 As a starting point the policy aims to maintain and enhance the retail and service function of the borough's centres and high streets. This includes the broad offer provided by Haringey's larger town centres as well as the more local offer of smaller centres, parades and high streets some of which fall outside the Town Centre Hierarchy. Having local retail uses such as newsagents, chemists, grocers, and bakers within walking distance of home is important, particularly for those with limited mobility, lower income groups and the elderly, and these local centres and dispersed local shops provide a valuable service in meeting the day-to-day needs of communities. They also contribute to the character and identity of local areas and are often a historic part of the borough's identity. The loss of ground floor active frontages, particularly where this results in a break in the continuity of frontages, can undermine the vitality and viability of a centre or parade and will be resisted.

28.29 The policy also seeks to accommodate an increasing range of uses within the Town Centre Network, including community space, leisure facilities and housing, to help improve the sustainability and adaptability of Haringey's town centres in the long term. However, this is balanced against the need to focus Commercial, Business and Services (Class E) within Primary Shopping Areas, and retain their core retail and

leisure functions, as recommended by the Retail and Town Centre Needs Study (2022).

- 28.30 Given flexibilities provided by the Use Class E, it is likely that most applications resulting in loss of retail or leisure floorspace will be towards non-Class E uses, or through partial re-provision/retention as part of redevelopment. Where this is the case, applicants should demonstrate through an Impact Assessment that the loss of ground floor retail (Class E (a)) or leisure (Class E (b)) frontage within the defined Primary Shopping Areas is justified. The assessment should follow the criteria of national planning policy guidance to identify any impact of the loss on the vitality and viability of the centre and its current and aspirational role in the network (as identified in this Draft Local Plan and through the Retail and Town Centre Needs Study 2022). Impact will be balanced against the potential benefits of the proposed new use.
- 28.31 Alongside the shift to multi-channel sales in retail markets, there is a growing demand for commercial leisure and cultural offers. These trends primarily highlight the importance of having a diverse experience to attract visitors to the high street and to extend the time they spend there through a range of retail and leisure attractions, as well as improvements in accessibility, inclusivity and perception of safety. Property owners and business along high streets are also responding to market trends by transforming bricks and mortar shops into multi-use spaces, and there is generally less need for large scale retail floorspace. This policy seeks to support this trend whilst still protecting primary shopping areas in Metropolitan and District Centres
- 28.32 A further factor affecting town centres is the flexibility offered by the recent changes to use class legislation and permitted development rights. This means many changes of use are now outside of planning control and will need to be monitored. However, the policy continues to protect the vitality and viability of town centres by protecting against the loss of yard space or other ancillary floorspace where this would lead to the continued commercial operation being adversely affected.
- 28.33 Evolving retail and leisure trends, wider regeneration and land intensification forms a key part of the challenge in servicing existing and new communities. Vacancies and blank frontages, particularly when clustered together, can have a negative impact on the perception of place (including safety), reduce footfall, and long term may lead to antisocial behaviour along these frontages. The policy therefore supports meanwhile uses to help manage longer term uncertainties in the market and secure the vitality of viability of both existing and future centres.
- 28.34 The policy also promotes the improved quality and activation of the public realm as a key part in expanding the offer of centres, as well as making best use of refurbishment and redevelopment opportunities to deliver an enhanced town centre offer as well as increased footfall through new residential development.
- 28.35 The introduction of residential uses within the ground floor frontage of town centres and high streets can have significant negative impacts through the introduction of

blank, inactive frontages, and cumulatively can degrade the appeal and attractiveness of the centre and its overall viability. Additionally given their frontage often interfaces with busy pavements, the resulting residential units will not enjoy adequate levels of amenity and can further be problematic for town centre uses which may generate noise, queues or operate at unsocial hours particularly for night time uses or where being serviced. As a consequence, residential uses are only supported above ground floor level. For the purposes of Part MA of Schedule 2 Part 3 of the General Permitted Development Order 2015, designated Town Centres and identified High Streets are considered key shopping areas in Haringey and change of use from commercial to residential is deemed undesirable due to the impact on sustainability of those shopping areas.

- 28.36 Where a proposal seeks the loss of an active frontage or retail unit, evidence of active and appropriate marketing over a continuous period of at least one year will be required to support any claim that there is no demand for retail space or other appropriate active frontage use. This should include evidence that premises have been marketed at an independently assessed market value price by an agent that specialises in commercial land sales.

Policy TC4: Redevelopment in Town Centres

- A. Redevelopment of existing sites within designated centres in the Town Centre Network and on identified high streets, including the reconfiguration or expansion of floorspace, will be supported where the proposal enhances and optimises placemaking, having particular regard to:
- (1) the opportunity to deliver new mixed-use development including through comprehensive redevelopment of multiple sites where appropriate;
 - (2) the potential to reuse and reconfigure existing space, or to provide new floorspace above or below commercial units;
 - (3) the need for high-quality design with well-designed active frontage at ground floor, animated public realm or that which can be activated via events or markets, and for appropriate signage and frontages to add vibrancy and a sense of place to the street scene;
 - (4) the need to contribute to healthy and safe environments such as by maximising public realm and open space improvements in the vicinity of the development, including through new public squares, civic spaces and access routes where appropriate;
 - (5) the need for proposed commercial units to be commercially viable and capable of flexibly accommodating a range of appropriate town centre uses;
 - (6) the need to protect the supply of smaller retail units for the benefit of small businesses;
 - (7) the need to deliver, or contribute to, any identified necessary physical and social infrastructure to support the centre's growth and increase opportunities for local business and residents.

Supporting Text

- 28.37 Making the best use of brownfield sites, particularly those within highly accessible locations is a key requirement of the NPPF and the London Plan. The Council therefore supports proposals that make the best use of limited sites within town centres to achieve this goal, and to ensure that the benefits of redevelopment are maximised. Residential uses can be appropriate in town centres but are only supported above ground floor level.
- 28.38 It is also essential that any redevelopment or change of use helps to improve the overall amenity and sense of place of an area to help ensure the vitality of a centre. This includes providing appropriate active frontages, securing enhancements to the public realm, and where identified, contributing to the provision of new public space, through routes, and necessary social infrastructure.

Policy TC5: Town Centre Activation

- A. Proposals to activate the public realm in town centres and on high streets will be supported where these contribute to the vitality and vibrancy of the location, assist in delivering the Council's Inclusive Economy Framework, Opportunity Haringey, and any related strategies, and do not give rise to unacceptable harm on the local environment or people who occupy it, including on residents, businesses and other town centre users.
- B. Permanent new markets or flexible use or event spaces will be supported within the Town Centre Network and on identified high streets where the proposal would not cause unacceptable harm to the amenity of adjoining residential property or operations of existing businesses and:
 - (1) the building and/or space is well designed and contributes to the quality activation of the public realm.
 - (2) there is a demonstrated market demand, which for proposed permanent markets could include temporary use testing of the concept.
 - (3) there are no adverse amenity and transport impacts.
 - (4) there are no adverse impacts on local safety or perception of safety
- C. The use of outdoor areas such as garden areas, rooftops, forecourts and parklets in association with food and beverage uses will be supported where the proposal would not cause unacceptable harm to the amenity of adjoining residential property, operations of highways and existing businesses, or other town centre users
- D. The Council will safeguard existing markets. Proposals affecting land used for existing markets will only be supported where:
 - (1) they re-provide market pitches and improve the associated public realm and trading environment;
 - (2) the number of pitches will not be reduced; and
 - (3) existing traders can take up replacement pitches on equivalent terms.

Supporting Text

Markets are an established component of some of Haringey's town centres, offering unique and different products to conventional retailing stores. They also add to the vibrancy of the borough, and provide space for small, often local independent traders who otherwise could not afford to operate. Therefore, it is important to safeguard existing markets and encourage new markets where there is an identified demand.

The increase in food and beverage uses within town centres and on high streets has helped ensure their vibrancy and vitality. The Council will work proactively with

businesses to enable the creative use of the public realm to enhance the offer of established businesses, however this should not give rise to unacceptable harm to the local environment or people that occupy it including impacts on highways and pedestrian safety, the overall amenity of an area and the continuing operation of neighbouring businesses.

Where possible, such facilities should integrate with the public realm of the surrounding area. It is expected proposals will be integral and functionally related to the business and they should generally be comprised solely of moveable furniture. Temporary furniture is important as it allows flexibility of the space to be converted back to public use. Having regard to Policy D3, boundary treatments, enclosures, screening shelters etc will be resisted where they impact negatively on accessibility by virtue of reducing openness or creating clutter. Consideration of smoking areas or shelters will be necessary and may require planning permission. The Council may consider limiting the hours of use through planning conditions.

Policy TC6: Healthy Town Centres

Hot food takeaways

- A. Proposals for a hot food takeaway will only be supported where:
 - (1) It is located within Haringey's Town Centre Network or on an identified high street
 - (2) It is not located within 400m of a school entrance in accordance with London Plan Policy E9
 - (3) It would not result in more than two hot food takeaway units being located immediately opposite or adjacent to each other, by maintaining a separation between them of at least two non-hot food takeaway units
 - (4) It would not cause harm to the character and amenity of the area.
 - (5) a commitment is made to operate the hot food takeaway in compliance with the Healthier Catering Commitment within six months of opening.
- B. Details must be provided setting out what measures will be taken to reduce litter associated with such uses and conditions may be imposed to manage this.
- C. Applications for food and drink uses where home delivery of food is proposed must include a Delivery and Servicing Plan to demonstrate adequate provision providing details of the scale of operation, delivery collection points, locations for parking of delivery vehicles/bikes and hours of operation, and provision of waiting and/or comfort facilities for associated delivery drivers.

Gambling, pawnbrokers and pay day loan shops

- D. Proposals for gambling premises, pawnbrokers, and pay day loan shops, will only be supported where it can be demonstrated that:
 - (1) it is not in prominent corner location or in the proximity of addiction or recovery centres and
 - (2) there are no existing uses of the same type within 200m radius of the property, and it would not result in the amount of those uses exceeding 1.5% of the total commercial units in the centre or on the high street; and
 - (3) it would not cause harm to the character and amenity of the area
 - (4) =
- E. Where proposals are acceptable having regard to part D of this policy, conditions will be attached (where relevant) to:
 - (1) require the display of information about local credit unions, debt advice services and/or gambling addiction services;
 - (2) require the operator to sign up to, and operate in compliance with, any scheme(s) which promote community safety and/or other good practice; and

- (3) require the display of information about any applicable interest rates, fees and charges.

Shisha

- F. Shisha smoking is an identifiable land use and is considered by the Council to be a sui generis use. Where shisha smoking is not ancillary to the main use of a premises and a material change of use is identified, planning permission will be required.
- G. Any proposals for a shisha use must demonstrate that there would be no adverse impact on residential amenity arising from noise, odour and fumes.
- H. Any alterations to a premises to facilitate shisha smoking such as opened up frontages, canopies, structures should be in keeping with the character of the area and provide an active frontage.

Supporting Text

- 28.39 The over concentration of certain uses can have harmful impacts on the vitality of town centres and high streets, the amenity of residents and communities, and the health and well-being of the local population.
- 28.40 London Plan Policy E9 requires boroughs to manage the concentration of hot food takeaways. This policy requires that hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. These restrictions are necessary due to the adverse impacts on health and wellbeing, and vitality and viability of centres that these uses can cause.
- 28.41 The Healthier Catering Commitment for London is a scheme run by the London Boroughs with support from the Mayor of London and the Association of Environmental Health Managers. The scheme recognises a commitment to reducing levels of saturated fat, salt and sugar in the food sold from their premises, and to provide smaller portions on request.
- 28.42 Applications for hot food takeaways must be accompanied with sufficient information to assess the potential impacts arising from the proposed use including managing litter and any associated anti-social behaviour. To ensure there is no unacceptable impact from litter on the amenity of the area conditions may be imposed to require installation of litter bins, commitments to undertake litter picking and advisory signage. This approach is supported through National Planning Policy Guidance on Healthy and Safe Communities.

- 28.43 Compared with other boroughs in London and across the country, Haringey has a high number of gambling premises. Gambling premises require a gambling premise licence and include betting premises (e.g. betting shops), adult gaming centres, betting track premises, family entertainment centres and bingo premises. Such premises can have a variety of adverse impacts on communities including worsening mental health (particularly with incidences of problem gambling) and exacerbating incidences of anti-social behaviour and crime. There is an identified clustering of gambling premises in certain areas of Haringey including in deprived areas of the borough. The Council therefore seeks to prevent the further over-concentration of these via a threshold-based policy. Pawnbrokers and pay day loan shops are linked to gambling addiction and the Council therefore seeks to prevent an overconcentration of such uses for the same reasons.
- 28.44 Shisha smoking is subject to the ban on smoking in public places in the UK alongside all other smoking. The grant of planning permission alone does not imply compliance with the Health Act 2006 (the Act which introduced the strict regulations around smoking). A Shisha business setting up must also satisfy laws around smoking, health and safety and trading standards.
- 28.45 Properly licensed and located, shisha lounges can provide a good place to meet and relax. However, concerns have been expressed about the impact of noise and anti-social behaviour from some shisha bars, especially in residential areas.
- 28.46 Planning permission may also be required for structures which facilitate shisha smoking such as canopies, awnings, heaters affixed to walls and timber structures to enable tables and chairs to be placed on them.
- 28.47 These healthy town centre restrictions are part of a wider comprehensive approach to tackle the causes of ill health, in co-operation with other Council departments including Public Health. The restrictions, including the percentage, distance or the quantum, may be updated in future through supporting documents.

Policy TC7: Delivery Orientated Premises

Dark kitchens

- A. Proposals for new or intensified 'dark kitchens' and 'dark shops' will only be supported in designated employment areas and on identified high streets. Proposals should meet the following quality criteria:
- (1) Where outside of a designated employment location, maintain a high quality active shopfront; and
 - (2) Provide accessible, safe facilities for drivers/couriers, including sheltered waiting space, toilets and secure cycle parking; and
 - (3) Be supported by a Delivery and Servicing Plan to demonstrate adequate provision providing details of the scale of operation, delivery collection points, locations for parking of delivery vehicles/bikes and hours of operation.

Micro-fulfilment centres

- B. Proposals for new or intensified 'micro-fulfilment centres' should be directed in order of priority to:
- (1) Designated employment areas;
 - (2) Identified High Streets;
 - (3) Areas within designated centres which are not designated as a Primary Shopping Area
- C. Proposals should meet the following quality criteria:
- (1) Where in a designated centre or identified high street, maintain a high quality active shopfront and offer click and collect facilities.
 - (2) When located in a designated centre or identified high street, should secure capacity for partnership servicing arrangements with other retail and leisure businesses in that locality.
 - (3) Provide accessible, safe facilities for drivers/couriers, including sheltered waiting space, toilets and secure cycle parking.
 - (4) Be supported by a Delivery and Servicing Plan to demonstrate adequate provision providing details of the scale of operation, delivery collection points, locations for parking of delivery vehicles/bikes and hours of operation.

Supporting Text

- 28.48 Online shopping has increased significantly over the last decade and internet sales share of total retail is now over 25 per cent at the first quarter of 2024⁸, against less than 5 per cent in 2008.
- 28.49 In the case of the food and drinks industry, the increased demand for deliveries from popular restaurants and cafes is leading to more demand for ‘dark kitchens’, where food is prepared on-demand in commercial kitchens with no customer access. Similarly, a significant rise in demand for same-day convenience goods delivery has led to the emergence of ‘dark shops’, where traditional shops are used for distribution purposes instead of being available for walk-in customers.
- 28.50 The Greater London Authority’s research on High Streets: Adaptive Strategies (2020), highlights opportunities to plan for coordinated deliveries to centres through ‘last mile’ delivery/ consolidation centres in order to reduce servicing vehicle numbers, followed by low-emission last mile deliveries (especially cargo-bike delivery). These micro-fulfilment centres may also benefit centres and high streets by hosting local collection points for customers, which in turn may generate further linked trips as with click and collect trends.
- 28.51 Small changes in consumer behaviour could have significant cumulative impacts, particularly on travel patterns, which should be strategically managed. Therefore, this policy seeks to support dark kitchens, dark shops and micro fulfilment centres in areas identified as suitable for employment or along high streets where their impacts on the Town Centre Network can be managed.

⁸ [Internet sales as a percentage of total retail sales \(ratio\) \(%\) - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Policy TC8: Visitor, Evening and Night Time Economy

- A. Evening and night time uses including theatres, show venues, and other venues that predominantly operate during the evening and at night will be supported within the designated Cultural Quarters, Wood Green Metropolitan Centre and the borough's district centres including the new North Tottenham District Centre which has a significant visitor, evening & night time economy related to the Tottenham Stadium. Night time uses will also be supported in existing local shopping parades with good public transport accessibility (PTAL 4 or above). Exceptions to this apply to public houses where they will serve a local area or specific redevelopment.
- B. The Council encourages the combination of evening and night time uses with alternative cultural, town centre or leisure uses that will operate and contribute to vitality and vibrancy during the day. Proposals for evening and night time uses should demonstrate that opportunities to do this have been fully considered and explored.
- C. Proposals for evening and night time uses including breweries, night clubs and cultural venues will be supported within designated Employment Areas where it is demonstrated that the use will:
 - (1) maximise employment opportunities, including being open for business or co-location of operations during the day;
 - (2) not impede the operations of neighbouring businesses;
 - (3) deliver improved public realm including adequate lighting and wayfinding, have secure access and be accessible safely by foot or cycle
- D. Evening and night time uses should contribute to making Haringey one of the safest London boroughs for women and girls and proposals will not be permitted where this would cause unacceptable harm to community safety or the amenity of neighbouring residential areas and subject to London Plan Policy D13 (C) and (D) – Agent of Change
- E. New residential development within the vicinity of existing or proposed evening and night time economy uses must provide mitigation for impacts from existing noise and other nuisance-generating activities or uses on the proposed new residential development in accordance with London Plan Policy D13 (A) and (B) – Agent of Change
- F. Proposals for Hotels, Guest Houses and other forms of visitor accommodation will be supported within the borough's Metropolitan and District Centres outside of designated Primary Shopping Areas. Proposals should:
 - (1) Not result in a net loss of existing housing or a reduction of planned housing as proposed within a Local Plan site allocation

- (2) Meets an identified need as evidenced by market testing
- (3) Provide satisfactory servicing including providing appropriate arrangements for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the accommodation;
- (4) Where appropriate, incorporate ancillary facilities such as restaurants, gyms and conference facilities that create employment opportunities for local residents, are open for public use and provided activated street frontages

G. Losses of visitor accommodation via change of use will be supported where the proposal demonstrates there is no longer a need for the accommodation with reference to occupancy rates within north London, the change of use would deliver conventional homes or another type of housing for which there is an evidenced local need, and the new housing would meet appropriate amenity and space standards.

Supporting Text

- 28.52 The evening economy is an important part of the local economy and particularly in certain areas of the borough, from the varied dining options, cinemas and public houses in Crouch End, to the renowned Green Lanes Turkish dining scene which operates well into the night, and the thriving visitor, evening & night time economy related to the Tottenham Stadium. This brings investment and vitality into local areas, improving job opportunities and income from leisure and tourism, providing opportunities for social interaction, and making town centres safer by increasing activity and passive surveillance.
- 28.53 The London Plan identifies that Wood Green has a night time economy of regional/sub regional importance and Green Lanes, Crouch End and Muswell Hill are of more than local importance. London's night-time cultural activities are one part of a growing night-time economy. Over 700,000 people work in London's night-time economy and this plays an important role in Haringey's economy. However, this can have negative impacts on local residents and the local environment needs to be carefully managed. Night-time activities can result in some places lacking activity and vitality during the day and so the Council supports the diversification and co-location of uses to enable active frontages throughout the day.
- 28.54 Haringey is a borough where violence against women and girls is not tolerated. The evening and night time economy in Haringey has an important role to play in promoting community safety and proposals for evening and night time uses should demonstrate how they will positively impact upon the safety and feeling of safety of women and girls.
- 28.55 The delivery of visitor accommodation must be balanced against need for other forms of development, not least housing. The London Plan (2021) estimates that London will need to build an additional 58,000 bedrooms of serviced accommodation by

2041, increasingly in Town Centres. The study allocates a share of the need to Haringey equating to 1.5 per cent or 879 net rooms between 2019 and 2041. Latest monitoring indicates that a significant number of rooms have already been delivered, with further in the pipeline. The policy therefore requires market demand testing to ensure there is not an over delivery and the protection of land for other uses.

28.56 Policy C2 within the Culture chapter deals with Public Houses.

Schedules of Proposals and Designations

This section includes the following schedules of proposals and designations which affect the use of land in the borough plus a housing trajectory

Proposals and designations are illustrated on the Policies Map which accompanies this plan.

Schedule 1 – List of Policies

This schedule lists all the policies in the Draft Local Plan, sets out whether they are strategic, and sets out which policies in the adopted 2017 Local Plan they are proposed to supersede.

Schedule 2 – Site Allocations

This schedule lists site allocations in the borough.

Schedule 3 – Views

This schedule sets out the defined areas and their limits as included in Policy 4B.15 ‘London View Protection Framework’ of the London Plan, as they affect the strategic view from Alexandra Palace to St Paul’s. It also sets out local views.

Schedule 4 – Conservation Areas

This schedule lists the Conservation Areas in the borough.

Schedule 5 – Historic Parks, Gardens and Landscape

This schedule identifies nationally and locally registered historic parks, gardens and landscapes in the borough.

Schedule 6 – Green Belt and Metropolitan Open Land

This schedule identifies the areas of the borough which are designated as Green Belt and Metropolitan Open Land. These form part of London’s strategic open space network as identified in the London Plan

Schedule 7 – Designated Open Space

This schedule identifies locally important areas of open space in the borough, known as Designated Open Space.

Schedule 8 – Ecologically Valuable Sites

This schedule identifies ecologically valuable sites and corridors in the borough. The schedule identifies a hierarchy of sites: Sites of Metropolitan Importance; Sites of Borough Importance (Grades I and II); Sites of Local Importance; and Green Corridors. The schedule also includes statutory Local Nature Reserves in the Borough.

Schedule 9 – Defined Employment Areas

This schedule lists the Defined Employment Area (DEAs) in the borough. These DEAs are divided into three categories: Strategic Industrial Locations (SILs); Locally Significant Industrial Sites (LSIS); and Local Employment Areas (LEAs).

Schedule 10 – Town Centre Hierarchy and Local Shopping Centres

This schedule identifies the extent of the Town Centres, Local Shopping Centres and identified High Streets.

Schedule 11 – Housing Trajectory

This schedule sets out a housing trajectory for the period covered by the Draft Local Plan.

Schedule 1 – List of Policies

Policy	Strategic Policy	2017 Local Plan Adopted Policy to be Superseded Upon Adoption
PM1: Delivering Placemaking	Yes	SP0: Presumption in favour of sustainable development
SS1: Spatial Strategy	Yes	SP1: Managing Growth
Neighbourhood Policies		
NTN1: North Tottenham	Yes	Tottenham AAP1 – AAP11. Site Allocations: Sites in the East of the Borough
NTN2: North Tottenham Cultural Quarter	No	None
THN1: Tottenham Hale	Yes	Tottenham AAP1 – AAP11.
THN2: Tottenham Hale District Centre	Yes	Tottenham AAP1 – AAP11.
SSN1: Seven Sisters and South Tottenham	Yes	Tottenham AAP1 – AAP11. Site Allocations: Sites in the East of the Borough
SSN2: Tottenham Green Cultural Quarter	No	None
BGN1: Bruce Grove	Yes	Tottenham AAP1 – AAP11.
WGN1: Wood Green	Yes	Site Allocations: Sites in Wood Green Metropolitan Centre
WGN2: Wood Green Metropolitan Centre	No	Site Allocations: Sites in Wood Green Metropolitan Centre
WGN3: Wood Green Cultural Quarter	No	Site Allocations: Sites in Wood Green Metropolitan Centre
GLN1: Green Lanes	Yes	Site Allocations: Sites in the South of the borough
HNN1: Hornsey	Yes	Site Allocations: Sites in the west of the Borough
CEN1: Crouch End	Yes	Site Allocations: Sites in the west of the Borough
SGN1: Stroud Green	Yes	Site Allocations: Sites in the west of the Borough
HGN1: Highgate	Yes	Site Allocations; Highgate Neighbourhood Area
MHN1: Muswell Hill	Yes	Site Allocations: Sites in the west of the Borough
MHN2: Muswell Hill Alexandra Palace Cultural Quarter	No	None
Design		

D1: Haringey Design Principles	Yes	SP11: Design DM1: Delivering High Quality Design
D2: Design-led Approach and delivering Design Quality	Yes	DM1: Delivering High Quality Design
D3: Inclusive Design	No	DM2: Accessible and Safe Environments
D4: Public Realm	No	DM3: Public Realm
D5: Active Street Frontages	No	DM3: Public Realm
D6: Artificial Lighting and Managing Noise Pollution	No	DM23: Environmental Protection
D7: Advertisements and Telecommunications	No	DM3: Public Realm
D8: Masterplans and Site Assembly	No	DM55: Regeneration/Masterplanning
D9: Views	No	DM5: Locally Significant Views and Vistas
D10: Tall and Mid-Rise Buildings	Yes	DM6: Building Heights
D11: High Quality Housing	Yes	DM12: Housing Design and Quality
D12: Waste Storage	No	DM4: Provision and Design of Waste Management Facilities
D13: Residential Extensions	No	DM12: Housing Design and Quality
D14: Basements and Lightwells	No	DM18: Residential Basement Development and Light Wells
D15: Managing Impacts of Construction	No	DM21: Sustainable Design, Layout and Construction
Heritage		
HE1: Built Heritage Conservation Charter	Yes	SP12: Conservation
HE2: Listed Buildings	No	DM9: Management of the Historic Environment
HE3: Registered Parks and Gardens	No	DM9: Management of the Historic Environment
HE4: Conservation Areas	No	DM9: Management of the Historic Environment
HE5: Non-Designated Heritage Assets	No	DM9: Management of the Historic Environment
Culture		
C1: A Culturally Rich Borough	Yes	SP15: Culture and Leisure SP16: Community Facilities
Policy C2: Protecting Cultural Facilities	Yes	SP16: Community Facilities DM50: Public Houses

Policy C3: Meanwhile, Ancillary and Flexible Cultural Uses	No	None
Policy C4: Public Art	No	None
Policy C5: Tottenham Creative Enterprise Zone	No	None
Policy C6: Warehouse Living	Yes	DM39: Warehouse Living
Climate Adaptation and Resilience		
CR1: Climate Adaptation and Resilience	Yes	SP5: Water Management and Flooding DM21: Sustainable Design, Layout and Construction
CR2: Supporting Urban Cooling	No	DM21: Sustainable Design, Layout and Construction
CR3: Minimising Overheating Risk in Buildings	No	DM21: Sustainable Design, Layout and Construction
CR4: Managing and Reducing Flood Risk	No	SP5: Water Management and Flooding DM24: Managing and Reducing Flood Risk DM26: Critical Drainage Areas DM28: Protecting and Enhancing Watercourses and Flood Defences
CR5: Sustainable Drainage	No	DM25: Sustainable Drainage Systems DM27: Protecting and Improving Groundwater Quality and Quantity
CR6: Water Efficiency	No	DM29: On-Site Management of Waste Water and Water Supply
CR7: Subsidence	No	None
CR8: Air Pollution	No	DM23: Environmental Protection
Climate Emergency and Buildings		
CE1: Achieving a Zero Carbon Balance	Yes	SP4: Working Towards a Low Carbon Haringey
CE2: Embodied Carbon and Retrofit	No	DM21: Sustainable Design, Layout and Construction
CE3: Supporting the Circular Economy	No	None
CE4: Energy Efficiency	No	DM21: Sustainable Design, Layout and Construction
CE5: Low and Zero Carbon Heating Infrastructure	No	DM22: Decentralised Energy
CE6: Renewable Energy	No	DM21: Sustainable Design, Layout and Construction
CE7: Assuring Energy Performance	No	None
Sustainable Travel		

T1: Achieving Sustainable Travel	Yes	SP7: Transport DM31: Sustainable Transport
T2: Walking	No	SP7: Transport
T3: Cycling	No	DM35: Cycle Storage in Front Gardens
T4: Public Transport	No	DM36: Mini Cab Offices
T5: Car Parking	No	DM32: Parking DM34: Driveways and Front Gardens
T6: Vehicle Crossovers	No	DM33: Crossovers, Vehicular Access and Adopting Roads
T7: Freight, Deliveries and Servicing	No	DM4: Provision and Design of Waste Management Facilities
Green and Blue Infrastructure		
G1: Green and Blue Infrastructure	Yes	SP13: Open Space and Biodiversity
G2: Green Belt and Metropolitan Open Land	Yes	SP13: Open Space and Biodiversity
G3: Open Space and Recreation	Yes	DM20: Open Space and Green Grid
G4: Urban Greening	No	DM21: Sustainable Design, Layout and Construction
G5: Biodiversity and Biodiversity Net Gain	No	DM19: Nature Conservation
G6: Trees	No	DM1: Delivering High Quality Design
G7: Food Growing	No	SP13: Open Space and Biodiversity
G8: Watercourses	No	DM28: Protecting and Enhancing Watercourses and Flood Defences
Housing		
H1: Meeting Housing Need	Yes	SP2: Housing DM10: Housing Supply
H2: Genuinely Affordable Housing	Yes	SP2: Housing DM13: Affordable Housing
H3: Housing Mix	Yes	DM12: Housing Mix
H4: Build to Rent	No	None
H5: Small Sites and Smaller Housing Developments	No	DM7: Development on Infill, Backland and Garden Land Sites
H6: Self-build, Custom Build and Community Led Housing	No	DM14: Self Build and Custom Build Housing
H7: Housing Older People and Vulnerable People	No	DM15: Specialist Housing
H8: Large-scale Purpose Built Shared Living	No	None
H9: Purpose Built Student Living	No	DM15: Specialist Housing

H10: Gypsy and Traveller Accommodation	No	SP3: Provision of Land for Gypsies and Travellers
H11: Loss of Existing Housing	No	DM10: Housing Supply
H12: Residential Conversions, Houses in Multiple Occupation and Hostels.	No	DM16: Residential Conversions DM17: Houses in Multiple Occupation
Social Infrastructure		
S1: Living Well	Yes	SP14: Health and Wellbeing SP16: Community Facilities DM48: Use of Planning Obligations
S2: Social Infrastructure	No	DM49: Managing the Provision and Quality of Community Infrastructure DM48: Use of Planning Obligations DM51: Provision of Day Nurseries and Child Care Facilities DM54: Facilitating Telecommunications Development
S3: Play Space	No	SP2: Housing DM48: Use of Planning Obligations
S4: Public Toilets	No	DM48: Use of Planning Obligations
Town Centres, High Streets and Shops		
TC1: Vibrant Town Centres and High Streets	Yes	SP10: Town Centres DM41: New Town Centre development
TC2: Town Centres First (Strategic)	Yes	SP10: Town Centres DM41: New Town Centre development DM42: Primary and secondary shopping frontages DM43: Local shopping centres
TC3: Town Centre Uses	No	DM41: New Town Centre development
TC4: Redevelopment in Town Centres	No	DM41: New Town Centre development DM45: Optimising the Use of Town Centre Land and Floorspace
TC5: Town Centre Activation	No	DM43: Local shopping centres DM44: Neighbourhood parades and other non-designated frontages
TC6: Healthy Town Centres	No	DM46: Betting Shops DM47: Hot Food Takeaways
TC7: Delivery Oriented Premises	No	None
TC8: Visitor, Evening and Night Time Economy	No	DM53: Hotels and visitor accommodation
Employment and Industry		
EI1: Inclusive and Resilient Economy	Yes	SP8: Employment
EI2: Designated Employment Land	Yes	SP8: Employment

		DM37: Maximising the use of employment land and floorspace DM38: Local Employment Area – Regeneration Areas
EI3: Non-Designated Employment Sites	No	DM40: Non-Designated Employment Land and Floorspace
E4: Affordable Employment Space	No	DM38: Local Employment Area – Regeneration Areas
EI5: Employment Skills and Enterprise	No	SP9: Improving Skills and Training to Support Access to Jobs and Community Cohesion and Inclusion DM48: Use of Planning Obligations
EI6: Contaminated Land	No	DM23: Environmental Protection

Schedule 2 – Site Allocations

North Tottenham

Allocation Reference	Name	Address	Total Units
NTSA01	High Road West	High Road West, N17	2900
NTSA02	Tottenham Hotspur Stadium	748 High Road	550
NTSA03	Northumberland Park	Northumberland Park Estate Area	1000
NTSA04	Junction of Marigold Road/Garman Road/Marsh		0
NTSA05	North of White Hart Lane	White Hart Lane Terrace	100
NTSA06	Wedge House	White Hart Lane	35
NTSA07	The Selby Centre	Selby Lane	200

Total units = 4,820

Tottenham Hale

Allocation Reference	Name	Address	Total Units
THSA01	Tottenham Hale Retail Park	Broad Lane and Ferry Lane	1500
THSA02	Tottenham Hale Station	Tottenham Hale Rail and Bus Station	150
THSA03	Ashley Link	Land at Ashle Rd	150
THSA04	Berol Yard	Land at Ashle Rd South of Burdock Road	370
THSA05	29-33 The Hale	29-33 The Hale	173
THSA06	Lockkeepers Cottage	Ferry Lane	13
THSA07	Former Garage Site	2 Ferry Lane	80
THSA08	Land to the North of Lebus Street	Lebus Street	0
THSA09	Fountayne Road	1-7 Fountayne Road	0
THSA10	Fountayne Business Centre	Fountayne Business Centre	0
THSA11	Constable Crescent	1-7 Constable Crescent	50

Total units = 2,486

Seven Sisters and South Tottenham

Allocation Reference	Name	Address	Total Units
SSSA01	Ward's Corner	High Road	100
SSSA02	Seven Sisters Station and Westerfield Carpark	Land and Buildings west of Westerfield Rd	50
SSSA03	Tottenham Green Leisure Centre and Library	1 Philip Lane	200
SSSA04	Gourley Triangle	Seven Sisters Road	450
SSSA05	Frederick Messers House	Seven Sisters Road	66
SSSA06	Former Stamford Hill Primary School	Berkley Road	0
SSSA07	Tiverton Primary School	Pulford Road	0
SSSA08	Land in front of 2 - 24 Tiverton Road	2-24 Tiverton Road	17
SSSA09	Seven Sisters & Tewkesbury Rd	341-379 Seven Sisters & 6-46 Tewkesbury Rd	60
SSSA10	Bernards Works	Bernard Works and 19 Bernard Rd	110
SSSA11	30 to 48 Lawrence Road	30 to 48 Lawrence Road	30
SSSA12	Corner of Lawrence Rd/Clyde Road	Lawrence Rd/Clyde Road	0
SSSA13	17 and 23 South Grove	17 and 23 South Grove	0

Total units = 1,083

Bruce Grove

Allocation Reference	Name	Address	Total Units
BGSA01	Bruce Grove Station	Tottenham High Road and Moorefield Road	10
BGSA02	Former Bruce Grove Cinema and Banqueting Su	110-119 Bruce Grove	20
BGSA03	Tottenham Delivery Office	Rear of 5 Bruce Grove	65
BGSA04	Cloud Garden	Land to the rear of 7-8 Bruce Grove	5
BGSA05	545-577 Tottenham High Road	545-577 Tottenham High Road	0
BGSA06	Aldi	570-592 High Rd	100
BGSA07	Stoneleigh Carpark C	302 Stoneliegh Road	20
BGSA08	Stoneleigh Carpark A and B	Stoneleigh Road	30
BGSA09	Rycroft Way Carpark	Rycroft Way	15
BGSA10	Welbourne Road Carpark	Welbourne Road Carpark, High Road	10

BGSA11	The Roundway	58-62 Lordship Lane	20
BGSA12	The Drapers Almshouses	Edmansons Close	0
BGSA13	Broad Water Farm	Broadwater Farm Estate	52
BGSA14	Brookside Green	Brookside Green	0
BGSA15	Rear of 167 The Roundway	Rear of 167	0

Total units = 347

Wood Green

Allocation Reference	Name	Address	Total Units
WGSA01	Wood Green Central	High Road and Station Road	900
WGSA02	Greenridings House	High Road	150
WGSA03	Morrison's Wood Green	High Road	260
WGSA04	Wood Green Library	High Road and Caxton Road	200
WGSA05	Spouters Corner	High Road and Buller Road	145
WGSA06	Mecca Bingo	707-725 Lordship Lane	326
WGSA07	Iceland Wood Green	59 Mayes Road	161
WGSA08	Rear of Hornsey Park Road	157-159 Hornsey Park Road	32
WGSA09	Bittern Place	Coburg Road	180
WGSA10	Mallard and Kingfisher Place	Coburg Road	190
WGSA11	Guillemot Place	Guillemot Place and Mayes Road	160
WGSA12	Chocolate Factory	Clarendon Road	150
WGSA13	L/A to Coronation Sidings	Western Road	180
WGSA14	Quicksilver Place	Western Road	100
WGSA15	Clarendon Square	Clarendon Road, Mayes Road	750
WGSA16	Clarendon Road Gateway	Clarendon Road	130
WGSA17	Clarendon Road South	Clarendon Road	150
WGSA18	Salvation Army	Lymington Avenue	74
WGSA19	16-54 Wood Green High Rd	16 to 54 High Road	105
WGSA20	Land between Westbury & Wymark Avenues	Whymark Avenue and High Road	120
WGSA21	Turnpike Lane Triangle	Westbury Avenue and Langham Road	40
WGSA22	Turnpike Lane Station	Turnpike Lane Station	85
WGSA23	The Mall	High Road	100
WGSA24	143-145 Station Road, Alexandra Palace	143-145 Station Road	26

WGSA25	Land to rear of Bridge Road	Bridge Road	162
WGSA26	LB Civic Centre	High Road	0
WGSA27	Wood Green Timber Yard	289-295 High Road	28

Total units = 4,904

Green Lanes

Allocation Reference	Name	Address	Total Units
GLSA01	St Ann's Hospital	St Anns Road	955
GLSA02	Arena Retail Park	Williamson Road	1300
GLSA03	Arena Design Centre	Ashfield Road	0
GLSA04	Crusader Industrial Estate	Hermitage Road	0
GLSA05	Omega Works	Hermitage Road	0
GLSA06	Vale Rd & Eade Rd	Eade Road and Vale Road	0
GLSA07	Overbury Rd	Eade Road and Vale Road	0
GLSA08	Former Oakdale Arms	Hermitage Road	10
GLSA09	Hermitage Road Shopping Parade	285-293 Hermitage Road	5
GLSA10	Wightman Rd Jewsons	Wightman Road	48

Total units = 2,318

Hornsey

Allocation Reference	Name	Address	Total Units
HYSA01	Hornsey Filter Beds	Newlands Road	100
HYSA02	Wat Tyler House	Boyton Road	15
HYSA03	Hornsey High Street New River	1 Bridge Wharf	10
HYSA04	7 Cross Lane	7 Cross Lane	9
HYSA05	Tottenham Lane YMCA	50 Tottenham lane	25
HYSA06	40-46C Tottenham Lane (Former Post Office)	40-46C Tottenham Lane	20
HYSA07	Hornsey Station Square	3-5c Tottenham Lane	40
HYSA08	Cranford Way LSIS	Cranford Way LSIS	0

Total units = 219

Crouch End

Allocation Reference	Name	Address	Total Units
CESA01	Crouch End Telephone Exchange	Crouch End Telephone Exchange, Crouch End Hil	46
CESA02	138-143 Crouch Hill	138-143 Crouch Hill, Crouch End	10
CESA03	156 Tottenham Lane	156 Tottenham Lane, Crouch End	30
CESA04	93-113 Park Rd	93-113 Park Rd, Crouch End	50
CESA05	Lynton Road depot and 72-96 Park Road	Lynton Road depot and 72-96 Park Road	90
CESA06	Ramsey Court	Ramsey Court Park Road	9

Total units = 235 Units

Stroud Green

Allocation Reference	Name	Address	Total Units
SGSA01	Finsbury Park Bowling Alley	Finsbury Park Bowling Alley, 2-8 Stroud Green	190
SGSA02	18-20 Stroud Green Rd	18-20 Stroud Green Rd, Finsbury Park	114
SGSA03	Rear of 84 - 106 Stroud Green Road	Stroud Green Rd, Finsbury Park	20
SGSA04	Osbourne Grove Nursing Home	Osborne Grove Nursing Home, 16 Upper Tollingt	0
SGSA05	73 Stapleton Hall Road	73 Stapleton Hall Road	6

Total units = 330

Highgate

Allocation Reference	Name	Address	Total Units
HGSA01	Highgate Yards	Townsend Yard, Duke's Head Yard, land rear of	30
HGSA02	Highgate School		0

HGSA03	460-470 Archway Rd	Wellington Sidings, 460-470 Archway Road	130
HGSA04	Wellington Gyratory, Archway Road	Wellington Gyratory, Archway Road	50
HGSA05	Land Adjacent 27 Aylmer Road	Land Adjacent 27 Aylmer Road	70
HGSA06	Former Highgate Rail Station	Highgate station, Archway Road	0
HGSA07	Gonnermann Antiques	408-410 Archway Rd	35
HGSA08	40 Muswell Hill Road Highgate	40 Muswell Hill Road Highgate	45
HGSA09	103-107 North Hill (Mary Fielding Guild)	103-107 North Hill (Mary Fielding Guild)	27
HGSA10	Hillcrest Estate	Hillcrest, off North Hill, Highgate	35
HGSA11	Former Newstead Nursing Home	Former Newstead Nursing Home	11
HGSA12	44-46 Hampstead Lane	44-46 Hampstead Lane	66

Total Units = 499

Muswell Hill

Allocation Reference	Name	Address	Total Units
MHSA01	Summerland Gardens car park	Summerland Gardens Car Park, Muswell Hill	50
MHSA02	107 Avenue Mews	107 Ave Mews, Muswell Hill	5
MHSA03	Muswell Hill Sainsburys	Princes Lane, Muswell Hill	30
MHSA04	Muswell Hill Car Park and 5-7 Fortis Green	105C Muswell Hill Rd, Muswell Hill	15
MHSA05	Former Friern Barnet Sewerage Works	Former Friern Barnet Sewerage Works, Pinkham	0
MHSA06	Alexandra Palace	Alexandra Palace, Alexandra Palace Way	0
MHSA07	Muswell Hill Telephone Exchange	6-8 Grand Ave, Muswell Hill	15
MHSA08	Royal British Legion Hall	Royal British Legion Hall, Muswell Hill Rd, M	20
MHSA09	Farrer Mews	Farrer Mews, London	15
MHSA10	Woodridings Court	Crescent Road	33
MHSA11	1 - 6 Crescent Mews	1 - 6 Crescent Mews	30

Total Units = 213

Schedule 3 – Views

The London Plan includes a policy called the **London View Management Framework (LVMF)**. This framework protects important views across London, including the one from **Alexandra Palace to St Paul's Cathedral**. Specific areas have been mapped out to ensure that new buildings do not interrupt this view.

There are three parts to the St Paul's Cathedral view designation:

1. Viewing Corridor

- This is the main protected line of sight from Alexandra Palace to St Paul's.
- It starts at the viewing point (identified on the policies map) and widens to **300 metres** at St Paul's.
- The total length of this corridor is **9.2 kilometres**.
- Buildings within this corridor must not block or interfere with the view.

	Easting	Northing	AOD Height
Location and height of the viewpoint at Alexandra Palace	529698.3	190061.1	92.2m
Location and height of the lower drum of St Paul's Cathedral	532054.4	181142.2	52.1m

2. Wider Setting Consultation Area (WSCA)

- This area surrounds the Viewing Corridor.
- It extends to **440 metres wide** at St Paul's.
- Any proposed developments here are reviewed to make sure they don't harm the view.

	Easting	Northing	AOD Height
Location and height of the western limit of the WSCA	529549.7	189916.8	92.4m

3. Background Consultation Area (BCA)

- This zone continues beyond the WSCA.
- It also spans **440 metres** wide and is defined by a line connecting key points.
- Buildings taller than **50 metres above sea level (AOD)** in this area may be reviewed for their impact on the view.

	Easting	Northing
Location of Western limit of BCA (Intersection of Charleston Street and Cotham Street, SE17)	532423	178624
Location of Eastern limit of BCA (Intersection of Old Kent Road and Mason Street, SE17)	533070	178903

Maps and diagrams showing these zones are available in the London View Management Framework Supplementary Planning Guidance (SPG) 2012 and on the Council's Policies Map.

Protecting the Foreground and Middle Ground

The London Plan also protects the **foreground and middle ground** of important views.

- The **foreground** includes the area around Alexandra Palace Park and is clearly marked on the Policies Map.
- The **middle ground** includes land around **Ridge Road and part of the Parkland Walk**, with a buffer zone of **150 metres**.
- New buildings in these areas must be carefully considered to avoid disrupting the view.

Location of Foreground Eastern Limit	Easting	Northing
Alexandra Palace	529714	190075
Extending to	530376	189824

Location of Foreground Western Limit	Easting	Northing
Alexandra Palace	529509	189883
Extending to	529468	189406

Local Views

There are also other important Local Views to and from Alexandra Palace and other notable landmarks in the borough as set out below. The viewing points and maps can be viewed in the Local Views Topic Paper.

Ref	View Name
1	Alexandra Palace - - - > Crouch End Ridge line

2	Alexandra Palace - - - > Highgate Ridge
3	Ferne Park Road at junction of Ridge Road - - - > Alexandra Palace
4	Ridge Road at junction of Denton Road - - - > Alexandra Palace
5	Corner of Seven Sisters Road, Amhurst Park and Eade Road - - - > Alexandra Palace
6	Downhill Park Road - - - - > Alexandra Palace
7	Adams Road - - - > Alexandra Park
8	Lordship Lane at Bruce Castle - - - > Alexandra Palace
9	Bounds Green Road railway bridge - - - > Alexandra Palace
10	Broomfield Park - - - > Alexandra Palace
11	Station Road, New Southgate - - - > Alexandra Palace
12	Alexandra Park Road at junction Curzon Road and Windermere Road - - - > Enfield and Lee Valley
13	Parkland Walk, bridge over St James Lane - - - > Crouch End valley, ridge, and central London landmarks beyond
14	Cranley Gardens - - - > view along street and backdrop to West Green beyond
15	The Bank, Highgate Hill - - - > view south towards Emirates and Central London
16	Archway Road north - - - > Archway Bridge and St Augustine of Canterbury Church
17	Archway Road south - - - > Archway Bridge
18	Bruce Castle Park northern side and along Church Road - - - > White Hart Lane Stadium
19	Tottenham High Road - - - > view north along the road from White Hart Lane Stadium Swell Corner
20	Tottenham High Road - - - > view along road from High Cross Monument to Bruce Grove Station
21	Stamford Hill near South Tottenham Station - - - > St Ignatius' Church
22	Stamford Hill at Ravensdale Road Junction - - - > St Ignatius' Church
23	Ferry Lane Bridge - - - > over River Lea and Lee Valley south

24	Ferry Lane Bridge - - - > over River Lea and Lee Valley north
25	Forest Road, Waltham Forest - - - > Lee Valley north
26	Chalk Bridge over Lee navigation - - - > Lee Valley and Tottenham

Schedule 4 – Conservation Areas

Conservation Area	
CA1	Highgate
CA2	Tottenham High Road Historic Corridor (THRHC)/North Tottenham
CA3	Fortis Green
CA4	Muswell Hill
CA5	Crouch End
CA6	Bruce Castle
CA7	Rookfield
CA8	Tottenham Cemetery
CA9	Tottenham High Road Historic Corridor (THRHC)/Tottenham Green
CA10	Wood Green Common
CA11	Tower Gardens
CA12	Trinity Gardens
CA13	Alexandra Palace & Park
CA14	Hornsey High Street
CA15	Hornsey Water Works & Filter Beds
CA16	Noel Park
CA17	St Anns
CA18	Tottenham High Road Historic Corridor (THRHC)/Scotland Green
CA19	Clyde Circus
CA20	Lordship Lane
CA21	Peabody Cottages
CA22	Tottenham High Road Historic Corridor (THRHC)/Bruce Grove
CA23	Bowes Park
CA24	Campsbourne Cottage Estate
CA25	Hillfield
CA26	Tottenham High Road Historic Corridor (THRHC)/Seven Sisters/Page Green
CA28	Stroud Green
CA29	Vallance Road

Schedule 5 – Historic Parks, Gardens and Landscapes

Name	Address
Alexandra Park	Alexandra Palace Way N22
Finsbury Park	Seven Sisters Road N4
All Hallows Churchyard	Church Lane N17
Avenue Gardens	Park Avenue N22
Bruce Castle Park	Church Lane N17
Chapman's Green	Lordship Lane/Perth Road N22
Crescent Gardens and Memorial Garden	High Road N22
Downhills Park	Downhills Park Road N17
Ducketts Common	Green Lanes N8
Finsbury Gardens	Finsbury Road N22
The Grove	Alexandra Palace Way N22
Grove Lodge Garden	Muswell Hill N10
Highgate Wood	Muswell Hill Road N6
Highpoint	North Hill N6
Lordship Recreation Ground Model Traffic Area	Lordship Lane N17
Nightingale Gardens	Bounds Green Road N22
Page Green Common	High Road N15
Priory Park	Priory Road N8
Queen's Wood	Muswell Hill Road N10
Rectory Gardens	High Street N8
Riversdale Gardens	White Hart Lane N22
St Luke's Hospital	Woodside Avenue N10
St Mary's Churchyard	High Street N8
Seven Sisters Gardens	Seven Sisters Road N15
Southwood Hall Estate	Muswell Hill Road N6
Southwood Hospital	Southwood Lane N6
Southwood House Estate Communal Garden	Southwood Lane N6
Southwood Park	Southwood Lawn Road N6
Tottenham Cemetery	Church Lane N17
Tottenham Green and Tottenham Green East	High Road N15
Tower Gardens	Risley Avenue N17
Trinity Gardens	Trinity Road N22
West Green Memorial Garden	Spur Road N15
White Hart Lane Estate and The Roundway	The Roundway N17
Wood Green Common	Station Road N22
Woodside Park	High Road N22

Schedule 6 – Green Belt and Metropolitan Open Land

Number	Name	Area (Hectares)
Green Belt		
1	Lee Valley Regional Park	55.07
Metropolitan Open Land		
1	Coldfall Wood and Coppetts Road Sports Ground N10	22.50
2	Highgate Golf Course, N6	33.18
3	Parkland Walk (Section from Highgate Underground Station to Finsbury Park), N4	8.83
4	Parkland Walk (Section from Muswell Hill Road to Muswell Hill), N10	2.62
5	Highgate Wood, Queens Wood, Shepherds Hill Allotments and Crouch End Playing Fields, N6	73.00
6	Alexandra Park, N22	88.59
7	Muswell Hill Golf Course, N10	52.09
8	Finsbury Park, N4	45.40
9	New River Sports Ground, White Hart Lane Recreation Ground, N17	30.43
10	Lordship Lane Recreation Ground and Downhills Park, N17	35.16
11	Tottenham Cemetery and Bruce Castle Park, N17	28.85
12	Highgate School Playing Fields, N6	8.70
13	Highgate Station Cutting, N6	1.70
14	Coldfall School and Fortismere School Playing Fields & 79 Creighton Avenue, N10	8.09
15	Former track bed - adjacent Highgate Wood, N6	1.48
16	Former railway land adjacent to Finsbury Park, N4	1.78
17	Highgate School Sports Ground, N6	2.17

Schedule 7 – Designated Open Space

Open Space Name	Type of Space
Weir hall Road Community Open Space	Allotments, Community Gardens and City Farms
Moselle Meadow	Allotments, Community Gardens and City Farms
Southwood House Estate Communal Garden	Allotments, Community Gardens and City Farms
Fortis Green Allotments	Allotments, Community Gardens and City Farms
Tottenham Green	Amenity green space
Durnsford Road Verges	Amenity Green Space
Muswell Hill Methodist Church	Cemeteries and Churchyards
Tottenham Green East	Historic Common
Page Green Common	Historic Common
Priory Common	Historic Common
Avenue/Finsbury/Nightingale/Trinity Gardens/Commerce Road	Historic Common
Cloud Garden	Natural and Semi-natural Urban Greenspace
Railway Fields Local Nature Reserve	Natural and Semi-natural Urban Greenspace
Palace Gates Woodland	Natural and Semi-natural Urban Greenspace
Wood Green Common Barratt Gardens	Natural and Semi-natural Urban Greenspace
Southwood Lane Wood	Natural and Semi-natural Urban Greenspace
Highgate Bowl	Natural and Semi-natural Urban Greenspace
Hale Village Open Space	Parks and Gardens
Hartington Park	Parks and Gardens
Down Lane Park	Parks and Gardens
Paignton Park	Parks and Gardens
Manchester Road Rose Garden	Parks and Gardens
Brunswick Park	Parks and Gardens
Chestnuts Park	Parks and Gardens
Tower Gardens	Parks and Gardens
Stanley Culross Open Space	Parks and Gardens
Ducketts Common	Parks and Gardens
Ducketts Common East Greengate Common	Parks and Gardens
Russell Park (Haringey)	Parks and Gardens
Chapmans Green	Parks and Gardens

Woodside Park and Newham Green	Parks and Gardens
Granville Road Spinney Wood	Parks and Gardens
Stationers Park	Parks and Gardens
Civic Centre Crescent Gardens	Parks and Gardens
Hornsey Churchyard	Parks and Gardens
Avenue Gardens (Haringey)	Parks and Gardens
Finsbury Gardens	Parks and Gardens
Trinity Gardens (Haringey)	Parks and Gardens
Priory Park (Haringey)	Parks and Gardens
Rokesley gardens	Parks and Gardens
The Rectory Gardens	Parks and Gardens
Belmont Recreation Ground	Parks and Gardens
Fairland Park	Parks and Gardens
Mill Mead Road Open Space	Parks and Gardens
Fairland Park	Parks and Gardens
Nightingale Gardens Bowes Park CG	Parks and Gardens
Tunnel Gardens (Wood Green Tunnel)	Parks and Gardens
Clarendon Open Space	Parks and Gardens
Grove Lodge	Parks and Gardens
Somerford Grove Open Space	Parks and Gardens
Springfield Community Park	Parks and Gardens
Tewkesbury Road Open Space	Parks and Gardens
Elizabeth Place games court	Playing Fields
Frederick Knight Sports Centre	Playing Fields
Rowland Hill Recreation Ground	Recreation Ground
New Road Park	Recreation Ground
Scout Park	Recreation Ground
St Aloysius/Channing Playing Fields N8	Recreation Ground
Crouch Hill Reservoir, land above	Semi-natural Urban Greenspace

Schedule 8 – Ecologically Valuable Sites

SITE GRADING

The sites are graded into those of Metropolitan, Borough and Local Importance.

SITES OF METROPOLITAN IMPORTANCE

These are identified largely on intrinsic nature conservation value from a London-wide perspective, although social value may also be taken into consideration. These sites are the highest priority for protection.

SITES OF BOROUGH IMPORTANCE

These are similarly identified, but taking a Borough-wide view, not that of the whole of London. This means that a Borough site in an ecologically-rich area like Haringey may be intrinsically better than one in a less rich area like Hammersmith & Fulham. Despite the potential variation in quality of Borough sites for different boroughs, those that are richly endowed with wildlife sites are likely to contain more Borough sites than ones which are relatively ecologically deficient. Borough sites are further divided into Borough Grade I and Borough Grade II categories; both types are of significant nature conservation value, but Borough I sites are of greater importance.

SITES OF LOCAL IMPORTANCE

Local sites are those which may be of a particular value to nearby residents or schools. In many cases these sites are already used by schools for nature study or are run by management committees mainly composed of local people. Local sites are particularly important in areas deficient in nearby wildlife sites. Areas of deficiency are here defined as those areas of built-up London which are more than a kilometre from an accessible wildlife site of at least Borough importance. If there are sites within such areas which offer at least limited interest for observing wildlife, or which have the potential to develop this interest, these will be chosen as local sites, as long as they have access or there is likelihood that this could be negotiated.

Proposed changes to 2017 Schedule of Sites of Importance for Nature Conservation

In line with the Haringey Sites of Importance for Nature Conservation Review (2024), the following changes are proposed to the borough's schedule of Sites of Importance for Nature Conservation.

Site Ref	Site Name	Extant Designation	Proposal
1	Lea Valley	Metropolitan	No Change
2	New River	Metropolitan	No Change

3	Highgate Wood and Queens Wood	Metropolitan	Split from Parkland Walk
4	Parkland Walk	Metropolitan	Split from Highgate Wood and Queens Wood
5	Coldfall Wood	Borough Grade 1	Upgrade to Metropolitan
6	Railway Fields Local Nature Reserve	Borough Grade 1	No Change
7	Alexandra Park	Borough Grade 1	No Change
8	Former Friern Barnet Sewage Works	Borough Grade 1	No Change
9	Bluebell Wood	Borough Grade 1	Split from Muswell Hill Golf Course and upgrade to Metropolitan
10	Muswell Hill Golf Course	Borough Grade 1	Split from Bluebell Wood and downgrade to Borough Grade 2
11	Crouch End Playing Fields Complex	Borough Grade 1	No Change
12	Scout Park	Borough Grade 1	No Change
13	Wood Green Reservoirs	Borough Grade 1	No Change
14	Tottenham Marshes	Borough Grade 1	No Change
15	Fortis Green Covered Reservoir and Central Foundation Playing Field	Borough Grade 2	Change Boundary. Western Half - retain and split into two SINCS - Fortis Green Covered Reservoir and Central Foundation Playing Field, same Grade 2
16	Fortis Green Community Allotments	Local SINC	Second half of retained SINC no. 15. Split from Fortis Green Covered Reservoir and Central Foundation Playing Fields. Downgraded to Local SINC. Eastern half of original designation to be removed from SINC designation. Reference to St Luke's hospital removed
17	Tottenham Cemetery and All Hallows Church Yard	Borough Grade 2	Split from Bruce Castle Park and Upgrade to Borough Grade 1

18	Bruce Castle Park	Borough Grade 2	Split from Tottenham Cemetery and All Hallows Church Yard and upgrade to Borough Grade 1
19	Palace Gates	Borough Grade 2	No Change
20	Grove Lodge, Muswell Hill	Borough Grade 2	No Change
21	Tunnel Gardens	Borough Grade 2	No Change
22	Highgate Gold Course	Borough Grade 2	No Change
23	Finsbury Park	Borough Grade 2	No Change
24	Tottenham Railsides	Borough Grade 2	No Change
25	Markfield Park	Borough Grade 2	No Change
26	Tottenham Hale to Northumberland Park Railsides	Borough Grade 2	No Change
27	Haringey Stadium Slopes	Borough Grade 2	No Change
28	Stroud Green Railway Banks	Borough Grade 2	No Change
29	Hollickwood Park	Borough Grade 2	No Change
30	Rhodes Avenue Spinney	Local SINC	No Change
31	Albert Road Recreation Ground	Local SINC	No Change
32	Chestnuts Park	Local SINC	Upgrade to Borough Grade 2
33	Lordship Lane Recreation Ground	Local SINC	Upgrade to Borough Grade 2 and extend to the west (western section to be Grade 1)
34	Harrington Site	Local SINC	No Change
35	Southwood Lane Wood	Local SINC	No Change
36	Land behind Fairfield Road	Local SINC	No Change
37	St Ann's Hospital Wood	Local SINC	No Change
38	Downhills Park	Local SINC	Extension to west - No Change in designation

39	St Mary's Churchyard, Hornsey	Local SINC	No Change
40	New River Sports Centre and White Hart Lane Recreation Ground	Local SINC	Split from Woodside Park, No Change in Designation
41	Woodside Park	Local SINC	Split from New River Sports Centre and White Hart Lane Recreation Ground, No change in designation
42	Nightingale Gardens and Avenue Gardens	Local SINC	No Change
43	The Priory Park	Local SINC	No Change
44	Paignton Road Open Space	Local SINC	No Change
45	Land behind Fortismere School	Local SINC	Change Boundary - Remove northern half (Eden Primary School), no change to remainder of site or designation
46	Muswell Hill Playing Fields	Local SINC	No Change
47	Down Lane Recreation Ground	Local SINC	No Change
48	North Bank, Pages Lane	Local SINC	Extend SINC boundary to west and upgrade to Borough Grade 2 SINC
49	Thorold Road Allotments	Local SINC	No Change
50	Chitts Hill Allotments	Local SINC	No Change
51	Devonshire Hill Allotments	Local SINC	No Change
52	Coles Park Allotments	Local SINC	No Change
53	Stockton Road Allotments	Local SINC	No Change
54	Gosspatrick Road Allotments	Local SINC	No Change
55	Courtman Road Allotments	Local SINC	No Change
56	Marsh Lane Allotments	Local SINC	No Change
57	Easthale Allotments	Local SINC	No Change
58	Creighton Avenue Allotments	Local SINC	No Change

59	Alexandra Park Allotments	Local SINC	No Change
60	Yeatman Road Allotments	Local SINC	No Change
61	Shepherds Hill Allotments	Local SINC	No Change
62	Tower Gardens	Local SINC	No Change
63	Granville Road Spinney	Local SINC	No Change
64	Bruce Grove Wood	Local SINC	No Change
65	Shepherds Hill Gardens	Local SINC	No Change
66	Westbury Banks Nature Reserve	No previous designation	Designate as Local SINC
67	Ducketts Common and Green Side Common	No previous designation	Designate as Local SINC
68	Muswell Hill Gold Course Allotments	No previous designation	Designate as Local SINC
69	Weir Hall Road Community Open Space	No previous designation	Designate as Local SINC
70	Springfield Community Park	No previous designation	Designate as Local SINC
71	Armada Green	No previous designation	Designate as Local SINC
72	Brunswick Road Open Space	No previous designation	Designate as Local SINC
73	Stationers Park	No previous designation	Designate as Local SINC

LOCAL NATURE RESERVES

Section 21 of the National Parks and Access to the Countryside Act, 1949, gave local authorities the power to acquire, declare and manage nature reserves. They are areas where the aim is to preserve manage and enhance the nature conservation interest of the selected site and provide the opportunity for study of flora and fauna of special interest. In Haringey these are:

- Railway Fields, N4 L11
- Queens Wood, N6 E10
- Parkland Walk. Cross Borough
- Coldfall Wood C7
- Alexandra Palace Park
- The Paddock (proposed)

Schedule 9 - Defined Employment Areas

DEA	Name of Site/Area	Level of Designation	Designation / Name Change Proposed
DEA 1	Brantwood Road, N17	Strategic Industrial Land	No Change
DEA 2	North East Tottenham, N17	Strategic Industrial Land	No Change
DEA 3	Marsh Lane, N17	Strategic Industrial Land	No Change
DEA 4	Millmead & Lockwood, N17	Strategic Industrial Land	No Change
DEA 5	Lindens/Roseberry Works	Locally Significant Industrial Site	No Change
DEA 6	Vale/Tewkesbury Rd, N4	Locally Significant Industrial Site	No Change
DEA 7	Queen St, N17	Locally Significant Industrial Site	No Change
DEA 8	White Hart Lane, N17	Locally Significant Industrial Site	No Change
DEA 9	Cranford Way, N8	Locally Significant Industrial Site	No Change
DEA 10	South Tottenham, N15	Locally Significant Industrial Site	No Change
DEA 11	Willoughby Lane, N17	Locally Significant Industrial Site	No Change
DEA 12	Rangemoor Road	Locally Significant Industrial Site	No Change
DEA 13	Bounds Green Industrial Estate	Locally Significant Industrial Site	Moved from LEA to LSIS
DEA 14	Pinkham Way	Local Employment Area	No Change
DEA 15	Fountayne Rd, N15	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 16	Bernard Road, Ashley Road, N15	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 17	Constable Crescent, N15	Local Employment Area	Moved to LEA. LEA: Regeneration

			Designation abolished
DEA18	Arena Design Centre, N4	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 19	Crusader Industrial Estate, N4	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 20	Omega Works, N4	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 21	Vale/ Eade Roads, N4	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 22	Eade/Overbury Rd, N4	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished
DEA 23	Wood Green, N22	Local Employment Area	Moved to LEA. LEA: Regeneration Designation abolished

Schedule 10 – Town Centre Hierarchy

The following tables lists the designated town centres in Haringey, their status, and any changes proposed to the boundaries. The policies map shows the full extent of the boundaries and those properties falling within them.

Centre	Designation	Boundary Change Proposed
Wood Green	Metropolitan Centre	Extension to include 13-37 Station Road, N22.
Green Lanes	District Centre	Extension to include 595 to 609 Green Lanes, and 388 - 380 Green Lanes
Crouch End	District Centre	Extension to include 78 Park Road - 120 Park Road. 151-171 Tottenham Lane (proposed to be deleted as a local shopping parade and incorporated within Crouch End District Centre) 71-75 Crouch End Hill
Muswell Hill	District Centre	No changes proposed
Tottenham High Road/Bruce Grove	District Centre	Extension to include 594-614 High Road, 599-579 High Road, 442-400 High Road and 415-465 High Road, 263-265 High Road.
North Tottenham	District Centre	New proposed District Centre
Tottenham Hale	District Centre	Extension to include:
West Green Road / Seven Sisters	District Centre	Extension to include 250 To 290 High Road, 120 - 126a West Green Road, 677-707 Seven Sisters Road.
Finsbury Park (part)	District Centre	No changes proposed
Alexandra Park Road, N10	Local Centre	No changes proposed
Archway Road N6	Local Centre	Extension to include 171-201 Archway Road
Aylmer Parade, N2	Local Centre	No changes proposed
Bounds Green, N11	Local Centre	No changes proposed
Broad Lane, N15	Local Centre	No changes proposed
Commerce Road, N22	Local Centre	No changes proposed
Cranley Parade, N10	Local Centre	No changes proposed
Craven Park Road, N15	Local Centre	No changes proposed

Crescent Road, N22	Local Centre	No changes proposed
Ferne Park Road, N4	Local Centre	No changes proposed
Hornsey High Street, N8	Local Centre	No changes proposed
Lordship Lane East, N17	Local Centre	No changes proposed
Lordship Lane Roundway, N17/ N22	Local Centre	No changes proposed
Lordship Lane West, N22	Local Centre	No changes proposed
Lordship Lane Central	Local Centre	No changes proposed
Midhurst Parade, N10	Local Centre	No changes proposed
Myddleton Road, N22	Local Centre	Extension to include 64-72 Myddleton Rd
Park Lane, N17	Local Centre	No changes proposed
Park Road/Priory Road, N8	Local Centre	No changes proposed
Philip Lane East, N15	Local Centre	No changes proposed
Philip Lane West, N15	Local Centre	No changes proposed
Quernmore Road, N4	Local Centre	No changes proposed
Seven Sisters Road, N1	Local Centre	No changes proposed
Stroud Green Road North, N4	Local Centre	No changes proposed
Stroud Green Road South, N4	Local Centre	No changes proposed
Tottenham Lane, N8 (East)	Local Centre	No changes proposed
Tottenham Lane, N8 (West)	Local Centre	Proposed for amalgamation into Crouch End District Centre
Tottenham High Road North, N17	Local Centre	No changes proposed
Turnpike Lane	Local Centre	No changes proposed
Westbury Avenue, N22	Local Centre	No changes proposed
West Green Road Central, N15	Local Centre	No changes proposed
West Green Road West, N15	Local Centre	No changes proposed
Weston Park, N8	Local Centre	No changes proposed

Wood Green High Road North, N22	Local Centre	No changes proposed
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The following table lists Identified High Streets across the Borough in accordance with Policies TC1 to TC8. They can be viewed on the Policies Map.

High Street Name
South Tottenham High Road
High Road Monument Way West
High Road Monument Way East
High Road Tottenham Stadium South West
Northumberland Park Station
Church Road
High Road Tottenham Stadium South East
Lordship Lane Lords Meade Road
Elizabeth Road Corner
Queens Parade Green lanes
Kings Rd Canning Crescent
Woodside Park Parade
Sidney Road Corner
Sylvan Avenue Corner
Bounds Green Centre South
Colney Hatch Lane West
Priory Road Nightingale Lane
Wightman Road North
Wightman Road South
Fortis Green Cheapside

Schedule 11 – Housing Trajectory

	Local Plan 15 Year Period					
	2024/25	2025/26	2026/27	2027/28-2031/32	2032/33-2036/37	2037/38-2041/42
Year of Trajectory	-2	-1	0	1	6	11
Requirement annualised (Target)	1,592	1,592	1,592	1,592	1,592	1,592
Cumulative Requirement (Target)	1,592	3,184	4,776	12,736	20,696	28,656
Past Completions	1,200					
Projected Completions (Majors)		1,030	1,236	7,075	7642	
Projected Completions (Minor / Windfall)		280	280	1,400	1,400	
Cumulative Completions (delivered & projected)	1,200	1,310	1,516	13,061	20,703	
Completions against annualised target variance	-392	-1,874	-3,260	325	7	

ⁱ <https://www.london.gov.uk/what-we-do/environment/climate-change/climate-adaptation/heat>

ⁱⁱ Interim target matches 2020 targets set by Royal Institute of British Architects (RIBA), “RIBA 2030 Climate Challenge”, June 2019 [Online]. Available: [2030 Climate Challenge \(architecture.com\)](https://www.architecture.com/2030-climate-challenge). This represents a 25% improvement on 2020 baseline values (800 kgCO₂e/sqm for residential and 1000 kgCO₂e/sqm for non-residential development). Baseline data sourced from LETI Carbon Primer is given as embodied carbon of buildings delivered to comply with UK Building Regulations in 2020.

ⁱⁱⁱ Target matches LETI Carbon Primer 2020 target to allow incremental adjustment ahead of 2030 full standard (this represents a 40% reduction over baseline ‘business as usual’ embodied carbon)

^{iv} <https://prdweb.co.uk/london-lets-talk-dirty/>

^v LETI Climate Emergency Design Guide: [Climate Emergency Design Guide | LETI](#)