

Agenda item:

[No.]

CABINET

26 January 2010

Report Title. LB Haringey comments on the draft replacement London Plan (LP), the draft London Economic Development (EDS) Strategy and the draft Mayor's Transport Strategy(MTS)

Report of Niall Bolger

Signed :

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Wards(s) affected: All

Report for: Key

1. Purpose of the report (That is, the decision required)

- 1.1 The Mayor published three major draft policy documents for consultation in October and is seeking views from the Boroughs, public agencies and all stakeholders. These are
- **Draft replacement London Plan (LP)**
 - **Draft Economic Development Strategy (EDS)**
 - **Mayor's Draft Transport Strategy (MTS)**
- 1.2 Following the publication of these strategies, the London Development Agency's (LDA) draft Investment Strategy was published in December. This sets out the broad investment priorities for 2010-2013 with the intention of supporting the delivery of outcomes identified in the replacement London Plan, draft MTS and draft EDS.
- 1.3 This report sets out the Council's response to all draft strategies. The response to the LDA's Investment Strategy is incorporated into the responses to the draft replacement London Plan, draft MTS and draft EDS.
- 1.4 The proposed Borough's key comments are set out in the main body of the report at Section 7. In Appendices 1-4, summaries of the 3 Plans/Strategies are set out along with both proposed general and key comments.

2. Introduction by Cabinet Member (if necessary)

- 2.1 The London Plan is the Spatial Strategy to guide growth and development in the region. The current plan was adopted in 2008. There are now a new set of draft proposals for a replacement plan to provide a strategic framework for the development of London between 2011-2031. The proposed new Plan will need to be respected by the developing Haringey Local Development Framework (2011-26) and will have more strength than the current London Plan in terms of local planning decisions.
- 2.2 The Mayor also published two other draft strategies for consultation; the economic development strategy and the transport strategy, both of which aim to support the new vision and objectives set out in the draft replacement London Plan.
- 2.3 Whilst the Council supports the Mayor's attempt to update and integrate these three strategies, there are a number of areas where the Council has considerable concerns. These are discussed in the report.

3. State link(s) with Council Plan Priorities and actions and /or other Strategies:

- 3.1 The London Plan forms part of Haringey's statutory development plan. The Haringey's Local Development Framework will need to reflect regional policies which have implications for a number of policy areas including housing provision, use of industrial land, quality of built environment, and safer communities, vitality of town centres, transport policies and economic regeneration.

4. Recommendations

- 4.1 It is recommended that Members endorse the proposed comments in Section 7 of this report and in Appendices 1-3, and that these are submitted to the Mayor of London as The Council's formal comments on the draft replacement London Plan, Economic Development Strategy and the Mayor's Transport Strategy.

5. Reason for recommendation(s)

- 5.1. The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework to guide the growth and development in London between 2011-2031. The local planning decisions and the future preparation of the spatial planning policy documents by the Council will have to comply with the London Plan when it is adopted. EDS and MTS have implications for future growth and investment in Haringey. It is therefore important for the Council to consider and comment on these three documents. Summaries of draft strategies and the Council's key comments are listed below in Section 7. In Appendices 1-3, summaries of the 3 Plans/Strategies are set out along with both proposed general and key comments.

6. Other options considered

- 6.1. The draft London Plan is produced as part of statutory process. The report sets out the Council's support, objections and comments on the draft replacement London Plan proposals. There are no alternative options considered.

7. Summary

Background

- 7.1 The Mayor published three major draft policy documents for consultation in October:
- **Draft replacement London Plan (LP)**
 - **Draft Economic Development Strategy (EDS)**
 - **Mayor's Draft Transport Strategy (MTS)**
- 7.2 Below is a summary of these three draft documents. The proposed Borough's key comments are also set out in this section. In Appendices 1-4, summaries of the 3 Plans/Strategies are set out along with both proposed general and key comments.
- 7.3 **Draft Replacement London Plan** : The key challenges set out in the draft London are as follows:
- A growing population, (9m by 2031), mainly forming smaller households
 - An ever diverse population
 - Continued economic growth but open to the global market and dependent on skill upgrades and business innovation
 - Persistent poverty and disadvantage
 - Critical need to address climate change both in terms of mitigation and adaptation
 - Careful and efficient management and use of resources available to London – since there will be less over the first half of the plan period
 - Strong neighbourhood and citizen desire for improved quality of life and safety
 - Perceived tension between the demands of growth and the conditions for a good quality of life, and a concern about the loss of things that have made living in London and its neighbourhoods a distinctive experience.

- 7.4 LP predicts that London is expected to grow by 14% with 600,000 additional households, 750,000 new jobs and 3 million additional journeys per day by 2031. The aim of the draft Plan is to ensure that growth contributes positively to the quality of life in London and takes place within current boundaries without encroaching on the Green Belt or open spaces, or having adverse impact on the natural environment and natural resources. The growth is expected to lead to demand for 40,000 more hotel rooms, 1.3 – 2.2 m2 of comparison goods floorspace, 2.25 m2 of office space in central London alone and 33,000 more homes per annum across London. Securing the Legacy of 2021 is the highest regeneration priority for the London Plan period.
- 7.5 The draft Economic Development Strategy (EDS), entitled ‘Rising to the Challenge’, follows on from the EDS proposals published in May 2009 (which the Council responded to), and seeks to position London as the premier global city, but with the highest standards of quality of life. The strategy has five key aspirational objectives that focus on:-
- cementing London’s competitiveness as a leading centre for international business,
 - managing climate change in the transition to a low carbon economy,
 - ensuring that all Londoner’s have the skills now and in the future to take advantage of new employment and enterprise opportunities,
 - business development, and
 - area regeneration.
- 7.6 **Draft London Transport Strategy:** The Mayor’s Transport Strategy (MTS) predicts that by 2031, there will be additional 3 million journeys per day. A key challenge for the MTS is to accommodate this additional demand for travel as well as address overcrowding on public transport and traffic congestion. The draft MTS contains six key goals:
- support economic development and population growth
 - enhance the quality of life for Londoners
 - improve the safety and security of all Londoners
 - improve transport opportunities for all Londoners
 - reduce transport’s contribution to climate change and improve its resilience
 - support delivery of the London 2012 Olympic and Paralympic Games and its legacy
- 7.7 **General Comments**
- London Plan does not properly address the “urban challenge” that the City is facing |**
- 7.7.1 Overall, Mayor’s three draft strategies do not set out a strong, clear and deliverable vision for London. It is not clear what the key “urban challenge” is for London over the next 20 years.
- Tackling poverty, deprived areas and climate change should be the challenge and priority:**
- 7.7.2 LBH sees tackling ongoing deprivation and poverty and climate change as key challenges for London for this plan period. LP and associated strategies do not put enough priority on dealing with poverty and disadvantage.
- 7.7.3 We propose as the key challenge” dealing with persistent poverty and deprived areas to ensure equality of opportunity and growth at a time of serious concern about climate

change and economic instability - and the limits of growth. There is a need for London to have a diverse economy so it can future-proof its community and its role in the UK economy...”

Growth Areas should be prioritised – Upper Lee Valley is critical

7.7.4 The Mayor supports all growth corridors with no specific prioritisation on tackling key areas of deprivation and opportunity for growth and investment. Upper Lee Valley (ULV) corridor is listed one of 30 New Strategic Outer London Development centres with a specific focus on industry. It is an area identified for growth and change. However, the investment into the already affluent growth areas is identified but no firm priority is given to the Upper Lee corridor.

There should be stronger focus on economic development in Outer London

7.7.5 The employment has grown fastest in inner and central parts of London with comparatively lower levels of employment growth in outer London. This new Plan is seen as an opportunity to address the employment generation in Outer London. However, the key focus for growth in all three strategies is still the Inner London and Central zone. None of the strategies offer specific policies or actions to deal with disadvantage and economic stability in Outer London.

London should invest in modern manufacturing and green industries

7.7.6 Despite policies on new and emerging economic sectors, it is clear from the LP and EDS that the overwhelming focus is on central London and the financial and business services sectors to secure London’s economic future. While this was to be expected an opportunity has been missed in the draft strategy to set out in more detail how Outer London can make more of a contribution to economic growth in the capital.

London Plan does not clearly enough argue the case for growth or show how a growing population and sufficient homes can be accommodated in terms of community infrastructure

7.7.7 The London plan supported by its key delivery strategies does not show strategically how population and household growth will be supported in particular with adequate transport, health and educational facilities – and the protection and growth of well located public open space. This strategic framework needs to be in place to give residents businesses and investors confidence that London will grow – but grow with quality services and environment.

7.8 Key Comments on the New draft Replacement London Plan (LP)

7.8.1 The LP does not set out clear vision on how the proposed growth in London integrates with transport and other infrastructure in a way that demonstrates a comprehensive future spatial approach for the capital. The draft Plan is especially weak on delivery, infrastructure requirements and implementation.

Growth Areas should be prioritised

7.8.2 The LP includes two growth areas of national importance – Thames Gateway and

London-Stansted-Cambridge-Peterborough Corridor, of which Haringey is a part – as well as those of importance to the wider south east region – London-Luton-Bedford, Wandsworth-Croydon-Crawley ('Wandle Valley'), and the Thames Valley/'Western Wedge'.

- 7.8.3 There is no prioritisation for investment between these growth areas. LBH suggests that there should be a prioritisation of opportunity areas and areas of intensification based on the criteria of need. The Upper Lee Valley Corridor should be given a priority for investment.

More practical focus on Outer London

- 7.8.4 The focus on Outer London and its role in economic development is welcome. However, the key focus for growth in all three strategies is still the inner London and central zone. There is no prioritisation of town centres in Haringey and no strong orbital transport proposals which is one of the key issues Outer London faces.

Opportunity Areas should also be the focus of improved services and local job creation

- 7.8.5 Policies for Opportunity Areas are very much focussed on "development and transport". There is not sufficient focus on access to services and jobs. More focus on outcomes for people would increase access to jobs for people in Haringey and promote less reliance on in-commuting. This in turn would release capacity for spend for more orbital transport links.

Upper Lee Valley (ULV) should be priority amongst Growth Areas

- 7.8.6 The Upper Lee Valley corridor (ULV) is listed as having a focus as an industrial area but there is no recognition that ULV could be a "green district". We welcome commitment to support new and emerging growth sectors and the emphasis given to the green sector both in LP and the EDS. It is discouraging however to note that ULV, Marsh Lane and Central Leaside area are not recognised for support for a "green industry district".
- 7.8.7 LBH suggest that London Plan should have a strong description about content and spatial vision for ULV Opportunity Area in the same way as there is for Central Activity Zone (CAZ). This lack of emphasis on ULV indicates how centrist the draft LP still is.

ULV Opportunity Area should be extended to include the Tottenham Corridor

- 7.8.8 The Opportunity Area boundary in ULV should be widened west and move to at least the rail line that runs from Liverpool Street to Enfield Town. This will allow the Tottenham Corridor to feature strongly in the Opportunity Area Planning Framework and properly compete for growth funds for the delivery of homes and public realm improvements at the heart of a persistently deprived community. It will also prove to be cost effective in terms of external funding than supporting the creation of new residential communities in the middle of the ULV strategic industrial and employment zone.

Definition of Areas of Intensification

- 7.8.9 We ask the Mayor to review its definition of "Areas of Intensification" to incorporate areas where investment is needed for the regeneration of an area based on intensification in cultural, leisure, heritage and entertainment activities. For instance, we propose Haringey

Heartlands to be extended to include the whole Wood Green town centre and also include areas such as the Alexandra Palace respecting its legal, public open space and cultural purpose.

More emphasis on green industry development

7.8.10 LP and EDS shy away from setting out a strong and diverse economy for the capital whose economic strength is equivalent to an average European country. There must be a strong support for green industry as well a general innovation, and industrial land must be kept for “elbow room” to allow new industry to locate on low value land in a high value city.

More emphasis on the protection of Strategic Industrial Land

7.8.11 This should be supported by increased emphasis on Strategic Industrial Land designation which includes most of Upper Lee Valley with two industrial areas in Haringey (Tottenham Hale area and the north east Tottenham. Loss of industrial land must slow significantly.

Cultural Areas declared for Haringey

7.8.12 There should be support for visitor economy in Haringey, and the north of the Borough should be declared a “cultural area” (Tottenham Hotspurs and Green, Haringey Heartland cultural quarter, Green Lanes and Alexandra Palace).

Concern about Affordable Housing Delivery

7.8.13 The removal of the 50% affordable housing target could be problematic for areas such as Haringey with already high levels of social and intermediate housing as pressure could be exerted to achieve higher housing targets to balance out lower targets in other parts of London. The Mayor needs to set out how, by removing this target, he will ensure an adequate spread of affordable housing across London; this will be crucial in helping to reduce the social polarity that is highlighted in the London Plan. Consideration should be given to including a strategic percentage figure in the London Plan.

Concern about Housing Supply

7.8.14 The draft Plan sets new housing targets for Haringey as 820 units per year between 2011-2021. This is based on a London-wide study of Strategic Housing Land Availability Assessment Study. We understand that Haringey figures include sites already identified in the UDP.

7.8.15 However, we are concerned that the draft London Plan does not provide sufficient information on how this growth will be supported by necessary social, physical and green infrastructure, and Council would like more clarity and discussion with the GLA on this particular issue.

Concern about Traveller Policy

7.8.16 We note that Haringey is required to provide 25 additional pitches for Gypsies and Travellers. We query the methodology for these figures. It is not clear why Haringey is allocated more additional pitches than some of our neighbouring boroughs. A clarification is needed for figures quoted in the draft Plan and we look forward to a more equal

distribution of sites across the subregion.

Minimising carbon dioxide emissions

7.8.17 The justification text for the Renewal Energy Policy refers to the presumption that all major development proposals will seek to reduce CO2 emission by at least 20 percent through the use of onsite renewable energy generation wherever feasible. We feel that the text is more appropriate for the policy rather than the justification text.

7.8.18 We support in principle that where, exceptionally, carbon reductions cannot be met on site any shortfall may be provided off-site or through in lieu cash payments, and the principle that funds can be pooled to meet carbon reduction emissions where on-site reduction cannot be fully met through borough-based carbon saving projects.

Concern about Community Infrastructure provision for Growth

7.8.19 LP lacks enough evidence to show how community infrastructure will support the predicted growth. This assessment appears to be largely left to the boroughs. Whilst Haringey supports Mayor's new emphasis on "strong neighbourhoods", failure to show how growth can be accommodated in terms of infrastructure is very disappointing.

Concern about transport over crowding and congestion

7.8.20 LP and Transport strategy does not address infrastructure implications of the population and household growth. The draft Plan should set out how specific measures will be promoted and delivered to support this growth and also support policies on road congestion and climate change. This is especially important in the light of information set out in the Mayor's draft Transport strategy for overcrowding in tube and rail connections.

Lack of orbital transport in Haringey

7.8.21 It should be recognised there are very few strong orbital transport projects in any of three strategies, and the rail improvements will do more for commuters than Haringey residents and businesses.

Concern about split of responsibility between local and strategic action

7.8.22 Lack of a clearer framework for the capital's future direction and development, coupled with a significantly high number of "loose" policy issues left to boroughs to determine at local level will have implications for increased workload for local councils during the next review of Core Strategies. On the other hand, in a number of cases the Planning Decisions section contains material that is of an inappropriate level of detail for a strategic plan (e.g. policies 5.9 Overheating and Cooling, 7.6 Architecture).

7.9 Key Comments on the draft Economic Development Strategy (EDS)

Proposed London economy is too narrowly focused

7.9.1 The key focus of the EDS appears to be a London as a world city whose economic success is mainly based on finance, business opportunity and hospitality.

Need for focus on “good business” as an aim – not just any business

- 7.9.2 EDS focuses too much on developing a good climate for business development and not enough on developing “good businesses” and businesses with good business skills. Good business is about firms which are more socially and environmentally aware.

EDS should focus more on deprived communities and neighbourhoods

- 7.9.3 EDS has the same flaw as the new draft LP and MTS. It has too many priorities. The document should be more focussed on improving economic development ability of deprived communities and neighbourhoods. The role of the London Development Agency (LDA) should not be reduced to just an enterprise agency. There are others such as the London First to play that role. The LDA should also focus on need and creating opportunities for a more to meet that need.

7.10 Key Comments on the Mayor’s draft Transport Strategy (MTS)

LP and MTS should be more “polycentric” – still too focused on central London and support for commuting

- 7.10.1 MTS shows that congestion will be the same or worse by the end of the strategy period/LP period. This is not a sustainable outcome. The strategy does not set out sufficient measures to reduce commuting
- 7.10.2 All three strategies are based on prediction that most of employment growth will be in Inner London, Central Activity Zone and along Cross-Rail route. This is an area which is already supported for growth and amelioration of disadvantage. This pattern of growth will reinforce the existing radial travel patterns and transport links, which are already overcrowded. The reinforcement of existing radial travel patterns will not reduce the need to travel or lead to shorter journeys being made and it will make it even more difficult in the future to change the dominance of radial patterns.
- 7.10.3 A polycentric approach to growth around London metropolitan town centres and interchanges with investment in orbital routes should be considered as this can promote less local travel by car.

Critical Haringey strategic transport projects must be delivered

- 7.10.4 Haringey Council welcomes the publication of the MTS at the same time as the draft London Plan and EDS to allow a comprehensive view of emerging policies and the work on integrating planning and transport policy. The MTS provides details of possible public transport expansion such as 4 tracking of West Anglia lines. However, this is not committed.
- 7.10.5 The investment in the Gyratory is committed and this project must be delivered. We emphasise the importance of works at Tottenham Gyratory to facilitate regeneration and sustainable growth in this part of London.
- 7.10.6 We welcome the opportunity to work with TfL on progressing some of the infrastructure proposals such as a review of the Hackney-Chelsea Line.

More support for transport interchanges

7.10.7 The need for investment applies to the improvement in interchanges and stations. Seven Sisters/South Tottenham, Finsbury Park and Tottenham Hale are identified as priority strategic interchanges although Wood Green as a key bus/tube interchange is not identified as such.

More support for travel demand management and changing travel behaviour

7.10.8 There should be more demand management. Otherwise congestion will not be addressed and carbon emissions will continue to grow. There is a need for more specific measures identified for more restrictions on destination car parking; more congestion charge pilots; restricting single occupancy trips; promotion of cycling, walking, school and work place travel plans. Smoothing traffic flow is supported but only if number of car trips is reduced.

7.10.9 More support is needed for transport behavioural change in outer London.

7.10.10 Measures for improving and managing congestion for North Circular should be smoothing traffic flow and improvement measures should not lead to road capacity being increased. Priority for public transport improvements must support internal London movement and not commuting.

8. Chief Financial Officer Comments

8.1 There are no direct financial implications for the Council and the cost of preparing this response has been contained within existing budgets. However, the draft plan and the strategies mentioned above have implications for the infrastructure investment in the subregion and in Haringey. These issues are highlighted in relevant policy sections in the Haringey's draft response and as these strategies evolve into more specific proposals and projects that require decisions on funding, reports will be presented to the relevant Committee as necessary.

9. Head of Legal Services Comments

9.1. The London Plan is the overall strategic plan for London setting out an integrated economic, environmental, transport and social framework for the development of London over the next 20-25 years.

9.2. The draft plan sets out a vision, policies and explanatory supporting material (reasoned justification) to guide the growth and development in London between 2011-2031. The local planning decisions and the future preparation of the spatial planning policy documents by the Council will have to comply with the London Plan when it is adopted.

10. Head of Procurement Comments – [Required for Procurement Committee]

11. Equalities & Community Cohesion Comments

- 11.1 The London Plan is the responsibility of the Mayor of London. Equalities and diversity is one the key themes in the draft replacement London Plan. However one of the key concerns of Haringey is that there is not enough priority given to deliver people focussed outcomes. Including tackling deprivation.

12. Consultation

- 12.1 The draft London Plan policies require a corporate response, and council services were invited to make an input to the Haringey's response to the draft London Plan. The following services have provided an input into the development of Haringey's (draft) response to the Replacement London Plan: Economic Regeneration, Leisure, Transport Policy (comments on Mayor's transport strategy). Draft Transport strategy was reported to CAB, and the EDS was reported to CEMB. LDF Members Advisory Group were consulted on the implications of the three draft strategies. This report incorporates and integrates comments received so far on these three strategies.
- 12.2 Consultation on Mayor's strategies ends on 12th January 2010. An interim response to the Mayor of London was submitted by 12th January 2010. Due to the Cabinet cycle, the GLA has agreed to accept Haringey's formal comments at the end of January after the Cabinet decision by 26th January.

13. Service Financial Comments

- 13.1 There are no direct financial implications for the Council. However, the draft plan and the strategies mentioned above have implications for the infrastructure investment in the subregion and in Haringey. These issues are highlighted in relevant policy sections in the Haringey's draft response.

14. Use of appendices /Tables and photographs

- Appendix 1- Key Diagram - Draft Replacement London Plan
- Appendix 2- Comments on the Draft Replacement London Plan (LP)
- Appendix 3- Comments on the Draft Economic Development Strategy (EDS)
- Appendix 4- Comments on the Draft Mayor's Transport Strategy (MTS)

1. Local Government (Access to Information) Act 1985

- 15.1 The following documents were used in the preparation of this report:
- Draft New London Plan (2009)
 - Draft Economic Development Strategy (2009)

- Draft Mayor's Transport strategy (2009)
- LDA Investment Plan (2009)
- Adopted London Plan (2008)

APPENDIX 1- Key Diagram (draft London Plan October 2009)

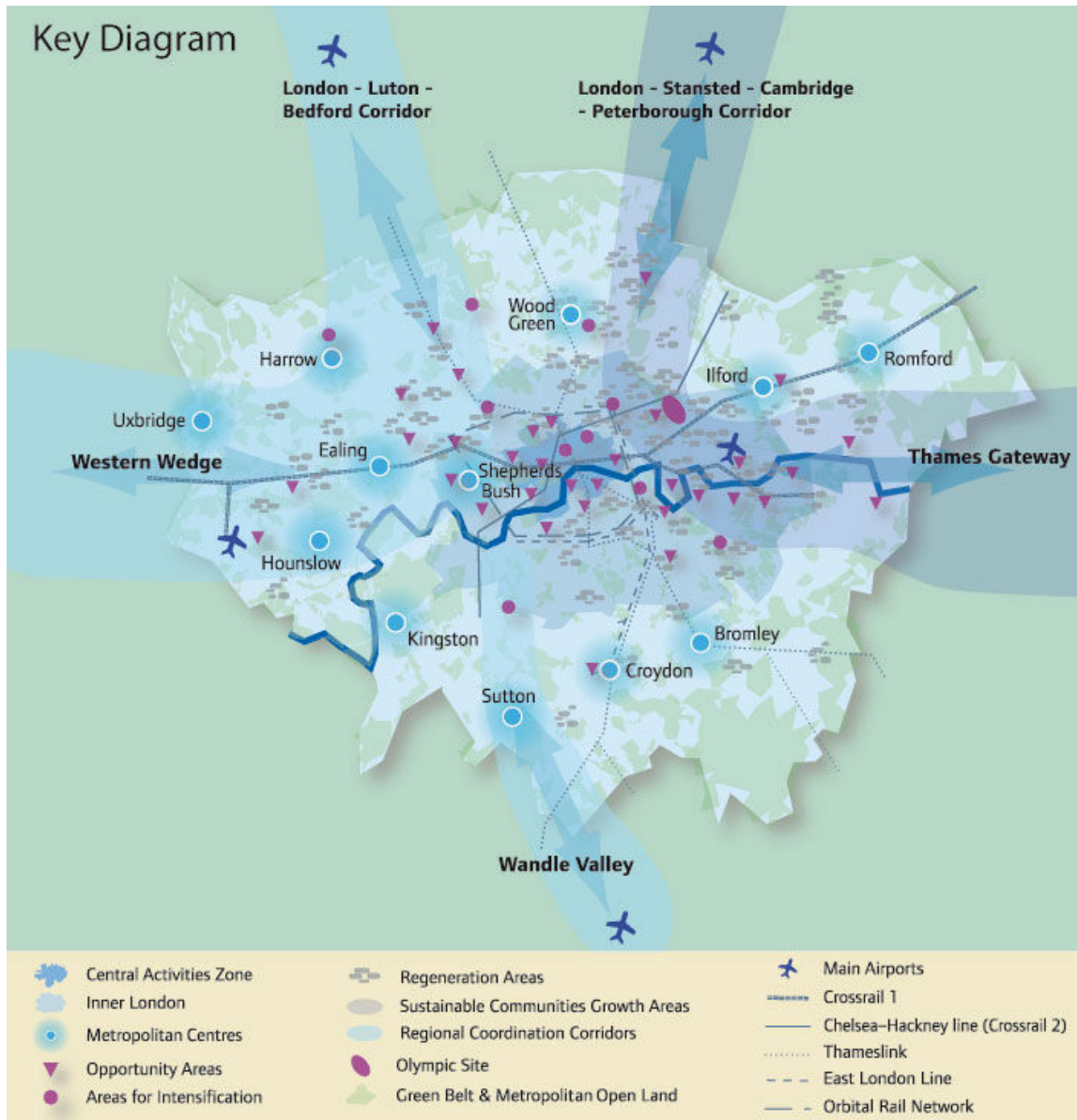


Figure 1: Key Diagram – draft Replacement London Plan)

APPENDIX 2 – COMMENTS ON THE DRAFT REPLACEMENT LONDON PLAN (October 2009)

1 Context and Strategy

- 1.1 The general approach of the draft replacement London Plan is supported: to ensure that growth contributes positively to the quality of life in London and takes place within current boundaries without encroaching on the Green Belt or open spaces, or having adverse impact on the natural environment and natural resources.
- 1.2 However, we do not consider that the draft Plan sets out a clear vision and strategy for the future of London. It is especially weak on delivery, infrastructure requirements and implementation. We propose as the key challenge for the Plan as follows”

” Dealing with persistent poverty and deprived areas to ensure equality of opportunity and growth at a time of serious concern about climate change and economic instability - and the limits of growth. There is a need for London to have a diverse economy so it can future-proof its community and its role in the UK economy.”

2 London’s Place

- 2.1 **Policy 2.3 Growth Areas:** The Mayor supports all growth corridors with no specific prioritisation on tackling key areas of deprivation and opportunity for growth and investment. Upper Lee Valley (ULV) corridor is listed one of 30 New Strategic Outer London Development centres with a specific focus on industry. It is an area identified for growth and change. However, the investment into the already affluent growth areas is identified but no firm priority is given to the Upper Lee corridor.
- 2.2 The Upper Lee Valley corridor (ULV) is listed as having a focus as an industrial area but there is no recognition that ULV could be a “green district”. We welcome commitment to support new and emerging growth sectors and the emphasis given to the green sector both in LP and the EDS. It is discouraging however to note that ULV, Marsh Lane and Central Leaside area are not recognised for support for a “green industry district “.
- 2.3 LBH suggest that London Plan should have a strong description about content and spatial vision for ULV Opportunity Area in the same way as there is for Central Activity Zone (CAZ). This lack of emphasis on ULV indicates how centrist the draft LP still is.
- 2.4 **Policy 2.5 Sub-regions:** New boundaries for the sub-regions are set for monitoring purposes and they are flexible to respond joint working arrangements for specific issues. This is welcome. It is important to emphasise that sub-regional working takes place in a flexible way to ensure that sub-regions and boundaries are most suited to a specific issue, and that existing cross-borough arrangements are not jeopardised.
- 2.5 **Policy 2.6 Outer London Vision:** The emphasis on Outer London is welcome. However, it is clear from the draft Plan that the overwhelming focus is on inner London and Central Activity Zone and already affluent growth areas. This is an opportunity missed in setting out in detail how Outer London can make more of a contribution to economic growth in the capital and how opportunities identified by the Outer London Commission can be realised.

- 2.6 **Policy 2.7 Outer London Economy:** Recognition of need for job creation based on its diversity and strengths focus on town centres and quality of life, transport links between town centres and orbital routes is welcome. The draft Plan is seen as an opportunity to address the employment and job issues in Outer London. However, the key focus for growth in all three strategies is still the inner London and central zone. None of the strategies offer specific policies or actions to deal with disadvantage and economic stability in Outer London.
- 2.7 **Policy 2.8 Outer London Transport:** It should be recognised there are very few strong orbital transport projects in any of three strategies, and the rail improvements will do more for commuters than Haringey residents and businesses
- 2.8 **Policy 2.13 Opportunity Areas and Intensification Areas:** We welcomed the continued designations for the Upper Lee Valley including Tottenham Hale as one of the opportunity areas and Haringey Heartlands as an Area of Intensification. They are among 43 such areas identified across London. We suggest that there should be a prioritisation for investment in opportunity areas and areas of intensification based on the criteria of need. The Upper Lee Valley Corridor should be given a priority for investment. The investment into the already affluent growth areas is identified but no firm priority is given to the Upper Lee corridor. One example we would like to highlight is the transport infrastructure, for instance the extension of Victoria line to Northumberland Park and beyond to Enfield.
- 2.9 **OAPF for Upper Lee Valley area:** ULV Opportunity Area should be widened west and move to at least the rail line that runs from Liverpool street to Enfield – this will allow the Tottenham Corridor to feature strongly in the Opportunity Area Framework (OAPF) and properly compete for growth funds for the delivery of homes and public realm improvements at the heart of a persistently deprived community. It will also prove to be cost effective in terms of external funding than supporting the creation of new residential communities in the middle of the ULV employment zone
- 2.10 **Definition of Areas of Intensification (page 254) and Policy 2.13 :** We ask the Mayor to review its definition of “Areas of Intensification” to incorporate areas where investment is needed for the regeneration of an area based on intensification in cultural, leisure, heritage and entertainment activities. For instance, we propose Haringey Heartlands to be extended to include the whole Wood Green town centre and also include areas such as the Alexandra Palace respecting its legal, public open space and cultural purpose.
- 2.11 **Policy 2.15 Town centres:** Emphasis on town centres as key drivers for development capacity and as focus for attractive business and public realm is welcome. However, there is no prioritisation of town centres in Haringey and no strong orbital transport proposals which is one of the key issues Outer London faces.
- 2.12 **Policy 2.16- Strategic Outer London Development Centres-** Upper Lee Valley (ULV) is one of 30 centres New Strategic Outer London Development centres with a specific focus on industry. Haringey welcomes this. However we would like more explicit emphasis in the Plan for the ULV especially for green industries and low carbon technologies.
- 2.13 **Policy 2.17 Strategic Industrial Land:** Haringey welcomes the strengthened Strategic Industrial Land Policy. It is noted that the SIL designations do not include Haringey Heartlands- It covers Tottenham Hale and North East Tottenham. Proposal for a more

flexible approach to car parking for office development in outer London is supported as the current standards are unrealistic.

3 London's People

- 3.1 **Policy 3.3- Increasing Housing Supply and Table 3.1:** The draft Plan sets new housing targets for Haringey as 820 units per year between 2011-2021. This is based on a London-wide study of Strategic Housing Land Availability Assessment Study developed with input from all London boroughs. The Haringey figures include sites already identified in the current UDP. However, we are concerned that the draft London Plan does not provide sufficient information on how this growth will be supported by necessary social, physical and green infrastructure, and Council would like more clarity and discussion with the GLA on this particular issue.
- 3.2 **Policy 3.5 Quality and Design of housing development and table 3.3:** The minimum space standards set out in Mayor's draft Housing Design guide are included in the Plan and new housing is to meet space standards. Haringey is supportive of the proposed standards and welcomes its application to all tenures including private sector housing.
- 3.3 **Policy 3.9 – Gypsy and Travellers sites-** We note the pitches required for the Gypsies and Travellers. Haringey is required to provide 25 additional pitches. We query the methodology for these figures. It is not clear why Haringey is allocated more additional pitches than neighbouring boroughs such as Enfield. A clarification may be needed for figures quoted in the draft Plan and we look forward to a more equal distribution of sites across the sub-region.
- 3.4 **Policy 3.12 Affordable Housing-** Boroughs can decide to set their affordable housing targets in absolute or percentage terms. Haringey's current policy is to continue to seek 50% affordable housing across the borough which is based on Housing Needs study 2007. However, the removal of the 50% housing target could be problematic for areas such as Haringey with already high levels of social and intermediate housing as pressure could be exerted to achieve higher housing targets to balance out lower targets in other parts of London. We question how, by removing this target, the Mayor will ensure an adequate spread of affordable housing across London; this will be crucial in helping to reduce the social polarity that is highlighted in the London Plan. Consideration should be given to including a strategic percentage figure in the London Plan. Consideration should also be given to the likely adverse impact of removing a percentage target figure for London on land prices. Targets can provide clarity to developers and landowners on likely affordable housing contributions, and reduce the likelihood of competitive bidding for scarce sites.

4 London's Economy

- 4.1 **Policy 4.1 Developing London's Economy:** Employment has grown fastest in inner and central parts of London with comparatively lower levels of employment growth in outer London. This Plan is seen as an opportunity to address the employment and job issues in Outer London. However, it is clear from the Plan and the draft Economic

Development Strategy (EDS) that the overwhelming focus is still on central London and the financial and business services sectors to secure London's economic future. While this was to be expected an opportunity has been missed in the draft strategy to set out in more detail how Outer London can make more of a contribution to economic growth in the capital. For example, the EDS strategy highlights sectors such as health and social work, which have significant representation in Outer London. However, continuing with the example of health and social work, no link is made to the emerging personalisation agenda and how the growth of social enterprises can be supported through this.

- 4.2 Also there are also other sectors to consider - a good starting point in the identification process would be the new national Skills Strategy, which highlights the following sectors: life sciences; digital media and technology; advanced manufacturing, engineering and construction; and low carbon technology. It is particularly important to consider a more diverse range of growth sectors to mitigate against a scenario of lower than expected population and employment growth.
- 4.3 **Policy 4.4 - Managing industrial land and premises:** Haringey welcome the rigorous approach promoted by the draft Plan on ensuring there is sufficient stock of land and premises to meet the future needs of different types of industrial and related uses. It is noted that the SIL designations for Haringey Heartlands is removed although local designations still apply. SIL designations cover Upper Lee Valley inc Tottenham Hale and North East Tottenham in Haringey as having a focus as an industrial area but no details as to what this means
- 4.4 **Policy 4.5 and Policy 4.6 –Visitors economy and Arts, Cultural and Entertainment:** We welcome the emphasise on Outer London for new arts, cultural and visitors attraction. There should be support for visitor economy in Haringey and the north of the Borough could be declared a strategic cultural area (Tottenham Hotspurs / Haringey Heartland cultural quarter and Alexandra Palace and Park).
- 4.5 **Policy 4.10 Emerging New sectors:** We welcome commitment to support new and emerging growth sectors and the emphasis given to green sector. However, it is discouraging that the ULV, Marsh Lane and Central Leaside area are not recognised for support for a “green industry district “.

5. London's response to Climate Change

- 5.1 The removal of the current strategic target for new developments is a concern. The justification text refers to the presumption that all major development proposals will seek to reduce CO2 emission by at least 20 percent through the use of onsite renewable energy generation wherever feasible. We feel that the text is more appropriate for the policy rather than the justification text.
- 5.2 We support in principle that where, exceptionally, carbon reductions cannot be met on site any shortfall may be provided off-site or through in lieu cash payments, and the principle that funds can be pooled to meet carbon reduction emissions where on-site reduction cannot be fully met through borough-based carbon saving projects.

6 Transport

- 6.1 While we welcome the general approach to this section for promoting sustainable modes of transport, the draft London Plan does not go much further than the general statements in national planning policy guidance. It is important to state where the priorities are for promoting sustainable travel, with private car given the least priority.
- 6.2 **Table 6.3 – Indicative List of Transport Schemes-** We note the list of transport schemes, which will help to support predicted growth across London and the support given to the Gyratory project. However, there has not been any attempt to link these projects to the wider growth approach of the draft Plan. Transport is a key infrastructure to support predicted growth. The draft Plan should set out how specific measures will be promoted and delivered to support this growth and also support policies on road congestion and climate change. This is especially important in the light of information set out in the Mayor’s draft Transport strategy for overcrowding in tube and rail connections.
- 6.3 **Policy 6.4 – Enhancing Transport Connectivity:** The policy on transport connectivity is supported. However, the importance of improvements to orbital routes should be included especially for outer London boroughs. Outer London town centres and greatly improved urban environment within town centres are key priorities. Wood Green is one of 12 identified town centres in London and MTS diagrammatically shows proposed enhancements from north, south and the west to Wood Green. However, MTS envisages enhancements to be better information and marketing for bus and rail links, improved walking and cycle routes to/from town centres and maximising benefits of existing rail services rather than any specific proposals for improving orbital routes.

7 London’s Living Places and Spaces

- 7.1 Whilst Haringey supports Mayor’s new emphasis on “strong neighbourhoods”, failure to show how growth can be accommodated in terms of infrastructure, provision of open space and quality public realm is very disappointing.

8 Implementation

- 8.1 It is crucial for the regional plan to demonstrate how the proposed policies will be implemented and delivered (PPS 11 requirement). The Plan should have demonstrated how the Mayor will be using the resources at his disposal and through his agencies and others such as Homes and Communities Agency to support the delivery of Plan’s policies.
- 8.2 The draft Plan supported by its key delivery strategies does not show strategically how population and household growth will be supported in particular with adequate transport, health and educational facilities – and the protection and growth of well located public open space. This strategic framework needs to be in place to give residents businesses and investors confidence that London will grow – but grow with quality services and environments.
- 8.3 The Plan lacks enough evidence to show how community infrastructure will support the predicted growth. This assessment appears to be largely left to the boroughs.
- 8.4 We note the list of transport schemes, which will help to support predicted growth across London and the support given to the Gyratory project. However, there has not been any attempt to link these projects to the wider growth approach of the draft Plan. Transport is

a key infrastructure to support predicted growth. The draft Plan should set out how specific measures will be promoted and delivered to support this growth and also support policies on road congestion and climate change. This is especially important in the light of information set out in the Mayor's draft Transport strategy for overcrowding in tube and rail connections.

APPENDIX 3 - COMMENTS ON THE DRAFT ECONOMIC DEVELOPMENT STRATEGY (EDS) October 2009

General points

1. Overall, the EDS alongside the revised London Plan and draft Transport Strategy does not set out a strong, clear and deliverable vision for London. It is not clear what the key "urban challenge" is for London over the next 20 years.
2. We see tackling ongoing deprivation and poverty and climate change as key challenges for London for this plan period. The EDS and associated strategies do not put enough priority on dealing with poverty and disadvantage. In our view the EDS has the same flaw as the new draft LP and MTS: it has too many priorities. The document should be more focussed on improving economic development ability of deprived communities and neighbourhoods.
3. We propose as the key challenge: "dealing with persistent poverty and deprived areas to ensure equality of opportunity and growth at a time of serious concern about climate change, economic instability and the limits of growth. There is a need for London to have a diverse economy so it can future-proof its community and its role in the UK economy..."
4. While the draft EDS is a strategic document that provides more aspirational policy objectives (relative to the London Plan and Transport Strategy) the implementation plan that will accompany the final version of the EDS and Investment Strategy need to have more detailed actions around delivering these objectives.
5. We have concerns that the links between the three draft strategies (London Plan, Transport Strategy and EDS) do not set out clearly how proposed growth in London will be integrated in a way that demonstrates a comprehensive future spatial, transport and social approach for the capital.
6. The proposals in the draft EDS are underpinned by the belief that London's economy will remain resilient to the effects of the recession and there will be robust growth in population and employment up to 2031. However, there is no analysis of what the implications will be if population and employment growth is not as robust as expected. This presents a major gap in the draft EDS that we feel will need to be addressed in the final version.
7. It is clear from the draft EDS that the overwhelming focus is on central London and the financial and business services sectors to secure London's economic future. While this was to be expected an opportunity has been missed in the draft EDS and Investment Strategy to set out in more detail how outer London can make more of a contribution to economic growth in the capital, an ambition that is articulated in the draft EDS. It will also be particularly important to consider a more diverse range of growth sectors to mitigate against a scenario of lower than expected population and employment growth.

Objective 1: To promote London as a city that excels as a world capital of business

8. This objective seeks to sustain London's leading place in the global economy by better co-ordinating its marketing and promotion and exercising its global strengths to the full.

Key implications

9. The major risk is that work to sustain London global competitiveness will not focus on the whole of London and just the central area of the capital.

Key comments

10. While we welcome the commitment to improve economic performance in outer London more details are needed on how the Mayor will help to deliver this.

Objective 2: to ensure that London has the most competitive business environment in the world

11. This objective seeks to strengthen London's economic productivity and competitiveness, through fostering innovation, supporting business, removing barriers to effective business, and by addressing weaknesses which inhibit investment. A core aim will be to improve the quality of life in London.

Key implications

12. Investment for supporting SMEs needs to focus on access to finance and in the provision of high quality and affordable business incubation and move-on space. This investment needs to be distributed across Outer London to even out provision and make business support 'local to the businesses that need it'

Key comments

13. The draft EDS focuses too much on developing a good climate for business development and not enough on developing good businesses that have good business skills.

Objective 3: to drive London's transition to a low carbon economy and to maximise the economic opportunities this will create.

14. This objective supports efforts to make the transition to a low carbon economy and in so doing adapt to, and mitigate the effects of climate change, essential if London is to remain competitive on the global stage and continue to be a place where people wish to live, work and invest. It also aims to ensure London is well placed to exploit the economic opportunities represented by the transition to a low carbon economy.

Key implications

15. The significant focus on a low carbon economy is to be welcomed and presents opportunities for the borough. Indeed, the Council has been proactive in this area illustrated by the successful application for the borough to be one of up to 10 low carbon zones in London.

Key comments

16. Additional investment will be needed to achieve this aspiration - especially for retrofitting existing properties and decentralised energy networks. This also needs to be linked to supporting employment and training opportunities to disadvantaged Londoners.

Objective 4: to give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers.

17. This objective supports efforts to address weaknesses in educational attainment, low skills and poor access to and retention of work, seeking to improve opportunities particularly for those most in poverty and in need, and to provide the quality of workforce essential for London's globally competitive economy.

Key implications

18. The Mayor commissions employment and skills interventions, through the LDA (including the North London Pledge, which Haringey Council manages), and the proposals to have a "single outcome focused regional commissioner, accountable to the London Skills and Employment Board" (LSEB) need to be more detailed and considered carefully.

Key comments

19. The lack of engagement from the LSEB with Haringey Council and our programmes, such as the Haringey Guarantee, is a cause of concern.
20. The proposal to have a "single outcome focussed regional commissioner accountable to the LSEB" is potentially significant, and as such needs to be more detailed. If this proposal is taken forward Haringey Council would expect to be a key consultee in its development.

Objective 5: to maximise the benefits to London from investment to support growth and regeneration, and from the 2012 Olympic and Paralympic Games and its legacy.

21. This objective seeks to promote, manage and steer investment in order to assist all sectors of the economy, from the most productive global businesses to the corner shop, in the ways that are most cost-effective and to places that most need it, including outer London.

Key implications

22. While the Mayor's aspirations here are to be supported more details are needed in areas such as: linking the development of Opportunity Areas to tackling deprivation; the benefits from the 2012 Olympics legacy; and the Mayor's support for town centre development.

Key comments

23. As above but also the EDS and LDA's Investment Strategy need to tie into the outcomes of the London Plan – seeking and matching the right investors to the right projects. Borough councils, including Haringey, already work through their Economic Development Functions with developers to realise the potential of good schemes and also to deliver wider economic benefits of those schemes.

APPENDIX 4 – DRAFT MAYOR'S TRANSPORT STRATEGY (MTS) (October 2009)

1. The Mayor's Transport Strategy (MTS) relates to the period up to 2031. The draft MTS contains six key goals:
 - support economic development and population growth
 - enhance the quality of life for Londoners
 - improve the safety and security of all Londoners
 - improve transport opportunities for all Londoners
 - reduce transport's contribution to climate change and improve its resilience
 - support delivery of the London 2012 Olympic and Paralympic Games and its legacy
2. By 2031 there will be additional 3 million journeys per day. A key challenge for the MTS is to accommodate this additional demand for travel as well as address overcrowding on public transport and traffic congestion. The mode share for cycling is predicted to increase from 2% to 5% from 2006 to 2031. Increases in walking and public transport share are also predicted with a 6% fall in private vehicle use.
3. Committed investment in public transport [Crossrail, tube capacity expansion, Thameslink and suburban rail capacity] will increase capacity in the morning peak by 30% from 2006 to 2031. However, even with this investment some areas will continue to be crowded from population and housing growth.
4. The draft strategy includes a target to reduce CO2 emissions by 60% from 1990 by 2025. MTS holds out the prospect of more stringent measures [road pricing and low carbon vehicle incentivisation within the context of growth in employment and population until 2031. Other issues covered are the difficulties of orbital travel, integrating land use and transport planning and dealing with predicted increases in traffic congestion.

Key Comments

1. Haringey Council welcomes the broad perspective of the MTS, in that it covers many topics which are sometimes neglected from transport documents. It particularly welcomes the coverage on accessibility, safety, the importance of the public realm and support to the role of outer London. We also welcome the publication of the MTS at the same time as the London Plan and EDS to allow a comprehensive view of emerging policies and the work on integrating planning and transport policy.
2. The Council welcomes the proposals for infrastructure investment and the efforts that have been made to identify what infrastructure investment is necessary to address the predicted increase in the demand for travel. We note the list of transport schemes which will help to support predicted growth across London.

3. Of particular note for Haringey is the continuing importance of works at Tottenham Gyratory to facilitate regeneration and sustainable growth in this part of London. Also we welcome the opportunity to work with TfL on progressing some of the infrastructure proposals such as a review of the Hackney-Chelsea Line.
4. However, Mayor' all three draft strategies are based on prediction that most of employment growth will be in Inner London, Central Activity Zone and along Cross-Rail route. This is an area which is already supported for growth and amelioration of disadvantage. We are concerned that this will reinforce the existing radial travel patterns and transport links, which are already overcrowded. In addition, this pattern of growth does not seem to reduce the need to travel which should be the underlying principle of the transport strategy.
5. The MTS analysis of demand and investment shows that even with all the proposed infrastructure investment there will still be overcrowding on the road and public transport network, despite there being some medium term improvements. This would seem to indicate that the level and/or the distribution of growth cannot be achieved in a sustainable way. We are aware of the work that has been done in looking at alternative growth distributions and the transport investment needs for these different patterns. However, Haringey's view would be that more and different scenarios need to be tested, with less concentration of growth in inner and central London. The reinforcement of existing radial travel patterns will not reduce the need to travel or lead to shorter journeys being made and it will make it even more difficult in the future to change the dominance of radial patterns.
6. Our other concern with the planned pattern of growth is that this could lead to more journeys over 5km, particularly car journeys. Haringey already experiences severe traffic and environmental problems due to a number of strategic radial routes through the borough and a relatively high percentage of through journeys. The borough can seek to work on changing travel behaviour for shorter journeys, but needs a London-wide approach to tackle these medium and longer journeys. We are not convinced that the existing proposed measures and policies in the draft MTS will help tackle increases in medium and long car journeys and thus the proposed measures and policies on traffic restraint need to be strengthened. The proposed improvements in quality of life, through enhanced environments, improved air quality and reduced noise, as well as reductions in carbon emissions, is unlikely to be achieved in those areas where through traffic increases. A polycentric approach to growth around London metropolitan town centres and interchanges with investment in orbital routes should be considered as this can promote less local travel by car.
7. Transport is a key infrastructure to support predicted growth. The MTS should set out how specific measures will be promoted and delivered to support this growth and also support policies on road congestion and climate change. This is especially important in the light of information set out in the draft strategy for overcrowding in tube and rail connections.
8. We welcome the identification of Wood Green as one of 12 identified town centres in London and this accords with the borough's own plans for regeneration and growth in Haringey. It is a key bus/tube interchange and should also be identified as a priority strategic interchange and would also assist promotion of orbital movements. Seven

Sisters/South Tottenham, Finsbury Park and Tottenham Hale are identified as priority strategic interchanges.

9. MTS forecast growth means that unspecified parts of the overground network which includes Barking – Gospel Oak line could justify longer trains. However, no funding commitment for this with an implication that trains will be overcrowded.
10. We are not convinced that the eradication of road humps will provide a significant reduction in noise and do not support replacing them with other speed reduction alternatives.
11. We welcome the continued support on setting an ambitious target to reduce CO₂ by 60% by 2025. We have also set an ambitious target for carbon reduction and appreciate what a challenge it will be to meet this.
12. More support is needed for transport behavioural change in outer London. Measures for improving and managing congestion for North Circular should be smoothing traffic flow and improvement measures should not lead to road capacity being increased. Priority for public transport improvements must support internal London movement and not commuting.
13. We particularly support the following policies: Support for enhancements to rail and coach services and the strategic road network in London (Policy1), support for connectivity and capacity on radial transport corridors into metropolitan town centres [e.g. Wood Green] (Policy 6), support for improved orbital connectivity in outer London, particularly between adjacent metropolitan town centres where shown to be value for money (Policy 7) support transport improvements within metropolitan town centres for people and freight that help improve connectivity and provide enhanced travel facilities for pedestrians and cyclists (Policy 8), support for development control processes to seek i) all high trip generating developments are located in areas of high public transport accessibility; ii) design and layout of development sites maximise access on foot, cycle and public transport; iii) maximise the opportunities for sustainable freight distribution; iv) planning contributions are sought for transport improvements, support for bringing transport assets to a good state of repair and maintain them in that condition (Policy10), support for reducing the need to travel, appropriate parking standards, smarter travel initiatives (Policy11), support for promotion of healthy travel options such as walking and cycling (Policy17), support for improvements to road safety, accessibility improvements such as streets, bus stops, enhancements to accessibility to jobs in deprived areas (policy 19,21,22).