Report for: Cabinet - 10 November 2026

Item number: 11

Title: Regulation 19 consultation on Proposed Submission version of Haringey Local Plan 2028-2043 and submission to Secretary of State

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

Lead Officers: Rob Krzyszowski, Director of Built Environment & Highways
Bryce Tudball, Head of Spatial Planning

Ward(s) affected: All

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 The Local Plan is the Council's principal statutory planning document for the borough which:

- Planning applications are determined in accordance with (unless material considerations indicate otherwise);
- Sets out a positive spatial strategy for managing growth, development and land use;
- Reflects and supports the Council's broader corporate strategies and policies; and
- Facilitates early and meaningful community engagement in the planning process.

1.2 The Council has prepared a new Haringey Local Plan to replace the existing suite of Local Plan documents adopted in July 2017. Preparation of a new Local Plan is necessary to ensure that Haringey has an up-to-date planning framework that:

- Provides a sound document for determining planning applications;
- Aligns with the latest Council corporate vision, strategies, policies and aspirations; and
- Complies with legal and policy requirements for maintaining up-to-date Local Plans.

1.3 The Proposed Submission Haringey Local Plan has been prepared following extensive evidence gathering, engagement and consultation over several years, including the New Local Plan First Steps Engagement and consultation on the Draft Local Plan.

1.4 Before the Council adopts the New Local Plan it much be published for a further consultation and submitted to the Secretary of State for the Ministry of Housing,

Communities and Local Government (MHCLG) for independent examination to ensure the plan is sound in accordance with the requirements of national planning policy.

2 Cabinet Member Introduction

2.1 The Local Plan is the Council's most important planning document, setting the long-term vision for how we can deliver new affordable homes, tackle inequality, access to nature and wildlife, respond to the climate emergency and support our local economy to benefit all our communities.

2.2 The last Local Plan was adopted in 2017, over the last decade the borough has changed significantly. Residents have waited too long for a clear vision for Haringey that reflects the priorities of local people today.

2.3 We need a plan that recognises the crisis the affordability in housing, the scale and extent of climate action and adaptation needed to address the climate emergency, and the lack of good jobs and opportunities for our young people.

2.4 We have engaged extensively with residents, communities and stakeholders on the local plan over five years since the First Steps Engagement in 2020. In 2025 close to 10,000 residents had their voices heard through the Draft Local Plan consultation. I would like to extend my thanks to those residents who took part in the consultation over the last 5 years, without your input the Proposed Submission Local Plan would not be as reflective of the views and needs of Haringey as it is today.

2.5 As a new administration, we have sought to strengthen this plan – recognising the importance of nature to our residents, responding to the strength of feeling around some of our most treasured community assets and delivering inclusive new developments that maximise the provision of housing that local people can afford. Amongst our key changes this administration has:

- Rowan's Bowling Alley: Removed the allocation for Rowan's Bowling Alley because we believe new developments should work with communities, not be done to them. Residents have made it clear that Rowan's is more than just bowling, karaoke, late night dancefloor and arcade; it is a much-loved community asset, and an important part of what Finsbury Park should be. This decision demonstrates our commitment to listening to local people and protecting the social infrastructure that makes our neighbourhoods thrive
- Pinkham Way: We are protecting Pinkham Way as open space for nature. This is an affirmation that our natural commons should be preserved and enhanced for future generations. After decades in which wildlife has

flourished on the site, it is right that its primary purpose should be biodiversity recovery, public enjoyment of nature and ecological stewardship. In the face of the climate and nature emergencies, protecting places like Pinkham Way is not a luxury but a necessity.

- Biodiversity targets: Increased biodiversity targets on new developments. There can be no social and economic justice without climate justice – people need high-quality affordable housing with access to nature to create sustainable, liveable neighbourhoods resilient in the face of climate breakdown.

2.6 Under central Government requirements, this local plan must be submitted as soon as possible, which is why we are bringing this plan forward now. Rather than waiting years to develop a revised plan, this administration accepts that any further delay would not be in the interest of Haringey's residents.

2.7 This Local Plan is just that: a plan. Going forward, we want to continue to work together, with our residents as this plan is brought to life. We want to put power back into the hands of people because we believe the power to drive long lasting change lies in our communities.

3 Recommendations

3.1 That Cabinet:

1) Notes the comments and informal recommendations of Strategic Planning Committee in relation to the Proposed Submission Local Plan and associated documents

2) Approve the updated Haringey Local Development Scheme (Appendix A) for publication with immediate effect (10 November 2026)

3) Note the consultation responses received during the Regulation 18 Draft Local Plan consultation and the Council's response to those comments (Appendix B).

3.2 That Cabinet recommend to Full Council that it:

4) Approves the Proposed Submission Haringey Local Plan (Appendix C) and Policies Map (Appendix D) for publication for a minimum six-week period of public consultation pursuant to Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

5) Approves the Integrated Impact Assessment and supporting consultation documents for publication alongside the Proposed Submission Local Plan.

6) Delegates authority to the Director of Built Environment & Highways to make any minor, non-material amendments to the Proposed Submission Local

Plan and supporting documents prior to publication including the Integrated Impact Assessment (IIA) in consultation with the Cabinet Member for Housing to the extent that any changes to the versions approved by Cabinet are not material changes and which could include changes to the text, layout and design of the Draft Local Plan consultation document and supporting documents and changes needed to clarify information or correct errors in the same.

7) Delegates authority to the Director of Built Environment & Highways, in consultation with the Cabinet Member for Housing, to make any minor amendments necessary to the Proposed Submission Haringey Local Plan and supporting documents following consultation and prior to submission, provided such amendments do not materially alter the strategy, policies or site allocations contained within the Plan.

8) Following the period of public consultation, authorises officers to proceed under Regulation 22 to submit the Proposed Submission Haringey Local Plan and associated documents to the Secretary of State for the Ministry of Housing, Communities and Local Government (MHCLG) for independent examination, together with any Regulation 19 representations.

9) Delegates authority to the Director of Built Environment & Highways, in consultation with the Cabinet Member for Housing, to draft and consult on any proposed modifications to the Local Plan arising during the examination process necessary to comply with national legislation, policy or guidance.

10) Notes that following examination, Full Council will decide on the final adoption of the Local Plan under Regulation 26.

4 Reasons for decision

4.1 The Planning and Compulsory Purchase Act 2004 requires local planning authorities to maintain and keep under review an up-to-date Local Plan.

4.2 The current Haringey Local Plan was adopted in 2017. Whilst many elements of the adopted plan remain relevant, significant changes have occurred since adoption including revisions to national planning policy, publication of the London Plan 2021, climate-related policy developments, and changes in local circumstances.

4.3 The Proposed Submission Local Plan provides an updated planning framework which responds to these changes and establishes a clear spatial strategy for managing growth and development across the borough over the plan period.

4.4 Publication of the Regulation 19 Plan is a statutory stage in the preparation of a Local Plan and is required before the Plan can be submitted for independent examination.

4.5 The Proposed Submission Plan has been informed by a robust evidence base, sustainability, health and equalities appraisal process and extensive public

engagement. Officers consider that the Plan has been positively prepared, justified, effective and consistent with national policy and is capable of being found sound at examination.

4.6 Approval of an updated Local Development Scheme will ensure that the Council maintains an up-to-date statutory programme for plan preparation and accurately communicates the revised Local Plan timetable to stakeholders.

5 Alternative options considered

5.1 The alternative options considered are:

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

- This option was rejected. Failure to progress a new Local Plan would leave the Council increasingly reliant on planning policies that were prepared under a different policy context and evidence base. This would reduce the effectiveness of the planning framework, increase risks associated with planning decision-making, and reduce the Council's ability to shape sustainable development and placemaking.

Delay publication of the Regulation 19 Local Plan

- This option was rejected. Delaying publication would postpone examination and adoption of a new Local Plan, mean that the Council is unable to meet the deadline for submission of the new Local Plan to the Secretary of State, and create uncertainty for communities and investors.

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

- This option was rejected. A partial review would not provide the comprehensive planning framework required to respond to changes in policy and local circumstances. A full replacement plan is considered the most appropriate approach.

6 Background information

6.1 The Local Plan is the Council's principal statutory planning document for the borough which:

- Planning applications are determined in accordance with (unless material considerations indicate otherwise);
- Sets out a positive spatial strategy for managing growth, development and land use;
- Reflects and supports the Council's broader corporate strategies and policies; and
- Facilitates early and meaningful community engagement in the planning process.

<u>National policy, guidance and legislation</u>

6.2 The main legislation, policy and guidance relevant to Haringey's new Local Plans which is referenced throughout this report includes:

- National Planning Policy Framework (NPPF) (December 2024) (note: a new NPPF came into force in August 2026 but the Council's Local Plan has been prepared under the 'legacy' planning system and will therefore be examined in relation to the December 2024 NPPF. References in the report are to this version of the NPPF unless otherwise stated).
- National Planning Practice Guidance (PPG): Plan Making (November 2025).
- Planning and Compulsory Purchase Act 2004 ('the Act');
- The Town and Country Planning (Local Planning) (England) Regulations 2012 ('the Regulations');

6.3 The planning system operates on the principle that decisions should be plan-led. Paragraph 15 of the NPPF states:

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

6.4 Paragraph 16 sets out that plans should:

- Contribute to sustainable development;
- Be aspirational yet deliverable;
- Be shaped by early and effective engagement;
- Contain clear and unambiguous policies;
- Be accessible through digital tools;
- Serve a clear purpose and avoid unnecessary duplication.

6.5 The NPPF sets out the "tests of soundness" which Local Plans must pass at the independent examination stage. Plans are sound if they are (paragraph 36):

- Positively prepared – i.e. seeking to meet objectively assessed needs including for housing;
- Justified – i.e. taking into account reasonable alternatives and based on proportionate evidence;
- Effective – i.e. deliverable and based on effective joint working on cross-boundary strategic matters; and
- Consistent with national policy – i.e. in accordance with the NPPF.

6.6 Further national guidance on Local Plans is provided in the national PPG on Plan Making which was last updated on 27 November 2025. It provides detailed guidance on:

- Community engagement;
- Evidence base requirements;
- Sustainability appraisal;
- Duty to cooperate;
- Digital accessibility;
- Implementation and monitoring.

6.7 Under the Planning and Compulsory Purchase Act 2004:

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

6.8 Local Plans must be reviewed at least every five years (Regulation 10A of the 2012 Regulations). The NPPF states that:
"Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. (paragraph 34)*"*

<u>London Plan & regional policy</u>

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

6.10 The current London Plan was adopted in 2021. It sets Haringey's current housing target and establishes a strategic policy framework shaping:

- where development goes
- how dense it should be
- how much affordable housing is required
- industrial land protection
- climate and net-zero standards
- transport and parking requirements
- town centre strategy
- design quality and environmental expectations.

6.11 Since early 2025 the Mayor of London has started preparing a new London Plan. The timescales for this are set out below:

- **May 2025** – Towards a New London Plan document published for public consultation
- **July to October 2026** – Draft London Plan published for consultation
- **2027** – Examination
- **Early 2028** – Adoption

6.12 The Draft London Plan was published for consultation from July to October 2026. It looks ahead to 2050 and sets out the Mayor of London's strategy for how London should grow and develop. It includes policies on housing, jobs, transport, the environment and public spaces. Of note for Haringey, the plan:

- sets the borough an annual housing target of 1891 homes (an increase of 20% on the current target)
- sets the Council a target to provide 33 gypsy and traveller pitches
- contains a substantially revised affordable housing approach which would reduce the affordable housing threshold on privately-owned land in the borough from 35% to 25% for schemes of 36 homes or more and from 35% to 20% for schemes of 10 to 35 homes

- earmarks South Tottenham Employment Area for industrial land release to accommodate residential-led development

6.13 At the current time, the Draft London Plan is a consultation draft and it is the London Plan 2021 which Haringey's new Local Plan must be in general conformity with. The Draft London Plan is expected to generate a very large consultation response and it is expected that there are highly likely to be substantive changes ahead of its eventual adoption.

Existing Haringey Local Plan (2017)

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

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

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

- **North London Waste Plan (NLWP)** – adopted 2022;
- **Highgate Neighbourhood Plan** – adopted 2017; and
- **The London Plan** – adopted 2021, to be replaced by the new London Plan in 2028.

New Haringey Local Plan

6.16 The four existing Haringey Local Plan documents will be completely replaced by the New Haringey Local Plan in a single document. It is proposed that the New Local Plan will have a 15-year timeframe, starting from adoption in 2028 and covering the period to 2043.

6.17 As the London Plan is part of the borough's statutory Development Plan, the New Local Plan does not need to duplicate policies in the London Plan which the Council is satisfied accords with its own objectives and aspirations.

6.18 However, many policies do require a locally-specific Haringey variation to ensure the borough's policies are compatible with the Council's wider corporate strategies and policies. These locally-specific policies require a robust local evidence base to justify a Haringey-specific approach, and these supporting evidence base documents will be published alongside the Proposed Submission Local Plan for consultation.

Plan-making process

6.19 Under the 2012 Local Plan Regulations, the preparation of a Local Plan begins with evidence gathering and engagement with stakeholders to identify key

planning issues and reasonable alternatives. This is followed by a Regulation 18 consultation, where the local planning authority seeks views on emerging options, strategies, site allocations and draft policies. At this stage, the plan is still being developed and consultees can substantively shape and influence its content. The Council has carried out two Regulation 18 consultations on the new Local Plan (one in in 2020/21 and one in 2025).

6.20 The authority then prepares a Proposed Submission Local Plan and publishes it for consultation under Regulation 19. This is the version of the plan that the authority intends to submit for examination and ultimately wishes to adopt. Representations at this stage are expected to focus on whether the plan is legally compliant, sound and supported by appropriate evidence, rather than on alternative options. This report seeks approval for this consultation to commence.

6.21 Following Regulation 19 consultation, the Local Plan, supporting evidence and representations are submitted to the Secretary of State for independent examination. A Planning Inspector then examines the plan to determine whether it meets legal requirements and is sound. Where necessary to comply with national regulations, policy or guidance, modifications may be proposed by the Council to help ensure it is sound before the Inspector issues a final report.

6.22 If the Inspector finds the plan sound, or sound subject to modifications, the council may formally adopt it. Once adopted, the Local Plan forms part of the statutory development plan and becomes the primary basis for determining planning applications in the area.

Timetable

6.23 The Act requires Local Plans to “be prepared in accordance with the Local Development Scheme” (LDS) (S19(1)). The Local Development Scheme is a Council’s public project plan for preparing and updating planning policy documents, particularly its Local Plan. It sets out which planning documents will be produced and the timetable for preparing the

6.24 The Council’s current Local Development Scheme was approved in March 2025. At that time, it anticipated a programme for progression of the new Local Plan that has subsequently been affected by further consultation activity, preparation of evidence, policy development, programme refinement and a change in administration.

6.25 As a result, the timetable set out in the March 2025 LDS is no longer fully aligned with the current programme.

6.26 An updated November 2026 Local Development Scheme is therefore attached at Appendix A. The revised LDS is set out in Table 1 below

- Regulation 19 publication
- Receipt of representations
- Submission to the Secretary of State
- Examination including consultation on any modifications necessary

- Receipt of Inspector's Report
- Adoption

Table 1: November 2026 LDS

Document	Regulation	Date in LDS
New Local Plan First Steps Engagement consultation	Regulation 18	November 2020 to February 2021
Draft Local Plan consultation	Regulation 18	October to December 2025
Proposed Submission Local Plan consultation	Regulation 19	December 2026 to January 2027
Submission & Examination	Regulation 22-25	March 2027 to September 2027
Adoption	Regulation 26	March 2028

6.27 Approval of the updated LDS will ensure that stakeholders, communities and statutory consultees have access to an up-to-date and realistic timetable for Local Plan preparation.

New Local Plan First Steps Engagement Regulation 18 consultation (2020/21)

6.28 Consultation on the New Local Plan First Steps Engagement document was launched on 16 November 2020 and closed on 1 February 2021. Over 10,000 comments were received from over 1,500 individuals and organisations.

6.29 The Planning Service won both regional and national awards for the consultation which was described by the Royal Town Planning Institute as an "imaginative, innovative, inclusive industry-leading approach to planning consultation."

6.30 The feedback received together with key feedback received from other Council consultations, including the Housing Strategy, Opportunity Haringey, Shaping Tottenham, Shaping Wood Green and the Parks and Greenspaces Strategy, informed the development of the Haringey Draft Local Plan.

Draft Local Plan Regulation 18 consultation

6.31 Consultation on the Draft Local Plan represented the principal Regulation 18 stage of plan preparation. The consultation, which took place from 10 October 2025 to 19 December 2025, was supported by a comprehensive programme of engagement activity. Engagement included:

- Public exhibitions;
- Community drop-in events;
- Workshops;
- Online consultation;
- Youth engagement;
- Stakeholder roundtables;
- Community organisation partnerships; and

- Targeted engagement with seldom-heard groups.

6.32 The level of engagement was as follows:

- consultation reached over 250,000 people
- digital campaign reached 140,000 people
- consultation website received over 50,000 visitors
- 9,706 responses from individuals and organisations

6.33 A report has been prepared of the consultation response and the Council's response (Appendix B). Consultation feedback demonstrated broad support for many of the plan's strategic objectives, particularly those relating to climate resilience, green infrastructure, active travel and environmental protection.

6.34 Respondents also raised important issues relating to housing delivery, affordable housing, town centres, employment land, infrastructure provision and site allocations.

6.35 Concerns around the plan most related to neighbourhood placemaking proposals. The most significant site-specific opposition related to the proposed allocation of Rowans Bowling Alley in Finsbury Park, which attracted substantial public interest following a London-wide media campaign. Circa 7,000 consultation responses were submitted in respect to this site comprising around 70% of the total consultation response.

6.36 Feedback from the consultation has directly informed the Proposed Submission Local Plan including revisions to policies, proposals and supporting text.

<u>Proposed Submission Local Plan (2026)</u>

6.37 The Proposed Submission Local Plan (Appendix C) and associated Policies Map (Appendix D) has been prepared for publication for a minimum six-week period of public consultation pursuant to Regulation 19 of the Regulations and for subsequent submission to the Secretary of State for the Ministry of Housing, Communities & Local Government for independent examination, together with any Regulation 19 representations, pursuant to Regulation 22 of the Regulations.

6.38 The plan has been developed through extensive engagement with the community, infrastructure providers, stakeholders, internal departments, and a Cross-Party Member Working group. The plan is supported by robust evidence and environmental appraisals and is in accordance with national policy requirements.

6.39 The plan is a single (all in one) Local Plan that sets a comprehensive, bold, and forward-looking placemaking framework and priorities for development and land use in the borough, contains neighbourhood strategies to manage growth, contains detailed policies to manage development, and site allocations to manage development on key sites. Upon adoption, the plan will replace the 2017 Haringey Local Plan Development Plan Documents listed in paragraph 6.14.

6.40 Table 2 below gives an overview of the key sections of the Proposed Submission Local Plan

Table 2: Proposed Submission Local Plan – Overview

Chapter 3: Strategic Context and Opportunity	Sets out our strengths, challenges and opportunities.
Chapter 4: Spatial Vision & Placemaking	Sets out the big spatial vision for Haringey
Chapter 5. Placemaking Framework	Sets out the Haringey Placemaking Framework to achieve the Council's spatial vision and an overarching placemaking policy to guide development and change in the borough in the future
Chapter 6: Spatial Strategy	Contains a strategy for land use and development in different parts of the borough to best achieve our vision through placemaking. This includes identifying focus areas, where there are greatest opportunities for us to work together to enhance and transform places for the better.
Part 2: Neighbourhoods Chapters 7 to 17	Contains visions, objectives, policies, and guidance for eleven identified neighbourhoods, as well as key sites with opportunities for enhancement or transformation (referred to as Site Allocations)
Part 3: Borough-wide Policies Chapters 18 to 29	Contains detailed policies on a range of thematic topics, such as housing, transport, and heritage.

6.41 The Proposed Submission Local Plan repeats key themes throughout including:

- A Culturally Rich Borough; Embracing and supporting the heritage, creativity, and character of our diverse communities and environments to deliver places that are distinctively Haringey, and where everyone feels a sense of pride and belonging.
- A Greener, Cleaner, Safer Borough; A leader in addressing the climate emergency and ecological crises, while being good stewards of place, and ensuring everyone feels safe
- Homes for the Future; Delivering the high-quality and resilient homes we need for the future to ensure that everyone has access to a safe, stable, and affordable home, regardless of their circumstances
- Supporting us to Live Well; Delivering the infrastructure our people need to live healthy and happy lives and make a difference in their communities

- An Inclusive Economy; Supporting our local economies and high streets, and maximising employment and training opportunities
- Connecting to Opportunities; Improving active travel, public transport, and digital infrastructure so that people can easily and safely access the services and opportunities they need to reach their potential

6.42 Key changes to the Proposed Submission Local Plan versus the Draft Local Plan include:

- General changes to take account of consultation responses, new and updated evidence, and new, updated and emerging national and regional policy
- Increase of housing target from 15,920 homes over 10 years to 21,535 homes over 12 years which includes meeting backlog of delivery over period 2021/2 to 2025/6
- Increase of Biodiversity Net Gain (BNG) requirement to 20% on schemes that are subject to statutory BNG
- Greater protection for ecological corridors and focus on enhancing connectivity
- Removal of Rowans Bowling Alley and Summerland Gardens car park site allocations
- Removal of employment land designation for Pinkham Way and inclusion of new open space designation for site
- Amendment of key site allocations including Hornsey Filter Beds, Tottenham Green Leisure Centre/Marcus Garvey, Tiverton/Stamford Hill schools, Wards Corner, Broadwater Farm and Wood Green Central
- Greater support for co-operative/community-led housing
- Inclusion of new policy relating to data centres
- Inclusion of new policy relating to temporary accommodation

6.43 Regulation 19 requires that before submitting a local plan to the Secretary of State the Council must:

a) make a copy of each of the proposed submission documents and a statement of the representations procedure available in accordance with Regulation 35; and

b) ensure that a statement of the representations procedure and a statement of the fact that the proposed submission documents are available for inspection and of the places and times at which they can be inspected, is sent to each of the general consultation bodies and each of the specific consultation bodies invited to make representations under regulation 18(1).

6.44 The purpose of Regulation 19 is to provide stakeholders with an opportunity to make formal representations on the Proposed Submission Local Plan before the Council submits it for independent examination. Representations should focus on whether the plan is legally compliant and sound, including whether it is positively prepared, justified, effective and consistent with national policy. The consultation is not a "blank sheet" consultation seeking general comments and is not intended to revisit earlier plan-making options but to assist the Inspector in determining whether the plan can be adopted.

6.45 Consultation of the Proposed Submission Local Plan must be carried out in accordance with the Regulations and the Council's Statement of Community Involvement (SCI).

6.46 The Council's Statement of Community Involvement sets out the aim that consultation will be:

- Effective
- Transparent
- Proportional
- Inclusive
- Accountable
- Coherent

6.47 Regulation 35 of the Regulations also provides that Local Plan documents should be made available for at least 6 weeks. The SCI also commits to publishing all Local Plan documents for at least 6 weeks

6.48 All responses received during the Regulation 19 consultation are in effect made to the Inspector and will be passed on to the appointed Planning Inspector for their consideration once the Local Plan is submitted for examination.

6.49 To ensure residents, business and other local stakeholders have had the opportunity to meaningfully shape policies, site allocations and placemaking in Haringey, and in accordance with the Haringey Deal, the Council conducted two (rather than the statutory minimum of one) broad Regulation 18 consultations for a total of 21 weeks which have heavily informed the Proposed Submission Local Plan.

6.50 Subject to approval, the Regulation 19 consultation will begin shortly after 23 November Full Council.

<u>Evidence Base</u>

6.51 In line with national policy and guidance, the New Local Plan must be informed and supported by a relevant and up-to-date evidence base that is adequate and proportionate. In support of the Proposed Submission Local Plan, officers have commissioned or produced the following evidence base (non-exhaustive):

- Strategic Housing Market Assessment
- Strategic Housing Land Availability Assessment
- Employment Land Review / Need & Availability Study
- Retail & Town Centres Needs Study
- Strategic Flood Risk Assessment (SFRA) Level 1 and Level 2
- Affordable Workspace Study
- Sites of Importance for Nature Conservation Study
- Towards Net Zero Carbon Study
- Archaeological Priority Area Review
- Urban Characterisation and Placemaking Study
- Tall Buildings Study
- Whole Plan Viability Assessment (including Affordable Housing)

- Infrastructure Delivery Plan (IDP).

Integrated Impact Assessment (IIA)

6.52 With regard to sustainability, the Act requires Local Plans to:
- "include policies designed to secure that the development and use of land in the LPA's (Local Planning Authority's) area contribute to the mitigation of, and adaptation to, climate change" (S19(1A));
- "carry out an appraisal of the sustainability of the proposals… [and] prepare a report of the findings of the appraisal" (S19(5)); and
- "exercise the function with the objective of contributing to the achievement of sustainable development" (S39(2)).

6.53 An Integrated Impact Assessment (IIA) has been prepared and updated alongside each iteration of the New Local Plan to ensure the impacts on the following are fully considered, as required by legislation, policy and guidance:

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

6.54 Alongside the Proposed Submission Local Plan, an Integrated Impact Assessment (IIA) Report has been prepared for consultation (Appendix E). This report assesses the likely effect of the Proposed Submission Local Plan together with reasonable alternative spatial strategies and policy approaches.

Submission of Local Plan and Examination

6.55 Following consultation, it is proposed that the Proposed Submission Local Plan be submitted, along with its associated documents, and representations received during Regulation 19 consultation to the Secretary of State, for independent examination.

6.56 Regulation 22 prescribes that the following documents must be submitted along with the plan for examination:
- The sustainability appraisal report (or IIA);
- A submission policies map
- A statement setting out who was invited to make representations on the plan at Regulation 18 consultation stage, how those representations were invited, a summary of the main issues raised; how the representations were taken into account; and the number of representations made under Regulation 20 (in response to consultation at Regulation 19 stage) and a summary of the main issues raised;

- Copies of all representations made under Regulation 20 (in response to consultation at Regulation 19 stage); and
- Such supporting documents which the Council considers are relevant to the preparation of the plan (these will include the evidence base).

6.57 Following submission, an Inspector will be appointed by the Secretary of State who will undertake a rigorous examination of the plan to determine whether the plan to ensure compliance with legal and procedural requirements and to determine its soundness. A plan is considered 'sound' if it meets the criteria in paragraph 6.5.

6.58 An independent programme officer will act as the liaison contact between the Inspector, the Council and those who have made representations during the examination. A dedicated examination webpage will be maintained with all relevant documents and correspondence publicly available.

6.59 Any person making a representation on a Regulation 19 Local Plan can request participation in the examination hearings. The Inspector decides which matters require discussion at hearings and who needs to attend, but those seeking changes to the plan have a right to appear and be heard in relation to matters the Inspector considers should be examined through hearing sessions. Written representations are also taken account of by the Inspector.

6.60 As part of the examination process, the Council can ask the inspector to recommend main modifications to the plan where necessary to make the plan sound and legally compliant. The examination is a rigorous process, and it is highly likely that the Inspector will find that some modifications are required. This is entirely normal and adds to the robustness to the Plan.

6.61 The Inspector will be asked to recommend such modifications as part of the examination of this Local Plan. The Inspector agrees the text of the proposed main modifications with the Council, based in most cases on discussion at the hearing sessions. The Council is then required to undertake sustainability appraisal as necessary and public consultation (minimum six weeks) on the proposed main modifications. The Inspector considers any representations on the main modifications as part of the examination.

6.62 At the end of the examination the Inspector produces a report for the Council setting out recommendation(s) and the reasons for them. The Council must publish this report. The report is not binding on the Council but the Council may not adopt an unsound plan.

6.63 The legislation allows for three possible outcomes to the examination:

1. The Inspector finds that the plan is sound and legally compliant as submitted: in these circumstances the Inspector must recommend that the plan is adopted;
2. The Inspector finds that the plan is unsound and/or legally non-compliant as submitted, but that it is possible to make it sound and legally compliant by making ‘main modifications’ to it. In these circumstances the Inspector must recommend the necessary modifications. The

modifications must relate directly to the reasons why the Inspector has found the plan unsound or legally non-compliant; and,

3. The Inspector finds the plan unsound and/or legally non-compliant as submitted, and that it is not possible to make it sound and legally compliant by making modifications to it.

6.64 Following receipt of a report that finds the plan sound the Council will be able to formally adopt the plan in line with the Inspector's recommendation. Full Council will then be asked to formally adoption the plan.

6.65 Upon adoption, the plan will replace the 2017 Haringey Local Plan Development Plan Documents listed in paragraph 6.14. It will then become the Council's principal statutory planning document alongside the London Plan, North London Waste Plan and Highgate Neighbourhood Plan.

6.66 Upon publication of the Regulation 19 plan, can begin giving it weight in planning decisions in accordance with Policy DM4 of the NPPF 2026. Weight is not automatic but relevant policies in the plan may be given weight according to:

a. The stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

b. The extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

c. The degree of compliance of the relevant policies with the policies for plan-making in the NPPF 2026 (the closer the policies in the emerging plan to the policies, the greater the weight that may be given to them).

6.67 For policies and proposals where the evidence base is robust, policies are consistent with national policy and there are limited unresolved objections the Council may be able to give moderate weight as material consideration to be considered along the statutory development plan.

Duty to Cooperate

6.68 The statutory Duty to Cooperate has been revoked as part of the Government's recent planning reforms and no longer forms a separate legal test for Local Plan examination. However, local planning authorities are still expected to demonstrate effective cross-boundary cooperation on strategic planning matters in accordance with national policy. The Council has engaged constructively and on an ongoing basis with neighbouring authorities, statutory bodies and infrastructure providers throughout plan preparation. This engagement will continue through publication, submission and examination.

Local Plan costs

6.69 The preparation of a Local Plan is a statutory function of the Council and is required by planning legislation. However, unlike some local government functions, there is no dedicated ongoing government funding stream specifically provided to cover the costs of Local Plan preparation. As a result, the

substantial costs associated with evidence gathering, consultation, and examination must generally be met from the Council's existing budgets. It should also be noted that planning application fees cannot be used to fund Local Plan preparation, as fee income is intended to support the development management function, including the processing and determination of planning applications, rather than plan-making activities.

6.70 Since starting work on the New Local Plan in 2020, the Council has incurred costs of circa £400k in preparing a robust and proportionate evidence base to support the plan and £40k on engagement and consultation activities. To minimise costs, the Council has prepared as much evidence in-house as possible, taking account of available staff resource and expertise.

6.71 The Planning Policy Team has been successful in obtaining over £300k MHCLG external grant funding to support elements of the Local Plan process, helping to minimise the financial burden on the Council and its residents. The key grants obtained were £228k of Local Plans Funding in March 2025 and £36k of Legacy Local Plans funding in March 2026.

6.72 The Council will incur further costs consulting on the Proposed Submission Local Plan and in relation to its examination. The likely further cost to the end of 2027/28 is estimated at between £100k and £200k with the principal cost being fees of the appointed Inspector. The exact level of cost will depend upon the length and complexity of the examination and whether any additional work is required by the Inspector. Costs incurred with be met through the existing service budget.

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

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

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

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

- Climate Change Action Plan 2021
- Walking and Cycling Action Plan 2022
- Housing Strategy 2023
- Parks and Greenspaces Strategy 2023

- Opportunity Haringey Inclusive Economy Framework 2023
- Health and Wellbeing Strategy 2023
- Culture Strategy 2024

Carbon and Climate Change

8.1 The Proposed Submission Local Plan seeks to deliver three overarching placemaking objectives, the third of which is: “a Sustainable and Resilient Place, with strong communities, a regenerating natural environment and on target to be net zero carbon by 2041”.

8.2 To help achieve this the plan contains a substantially enhanced approach to reducing carbon and increasing sustainability. This approach is embedded throughout the entire plan which has seeks to deliver a sustainable pattern of development which encourages a shift to sustainable modes of transport.

8.3 The plan is supported by a new strategic policy requiring all development in the borough to achieve a Zero Carbon balance. To deliver this, proposals will be required to minimise embodied carbon emissions in accordance with a new Embodied Carbon Hierarchy, minimise waste by applying new Circular Economy Principles, and achieve net zero operational carbon by following a new Operational Carbon Hierarchy.

9 Statutory comments

Finance

9.1 This report seeks Cabinet approval of the recommendations set out in Sections 3.1 and 3.2 relating to the Council's proposed Haringey Local Plan. The Local Plan is the Council's principal statutory planning document for the borough and sets out the vision, strategic objectives, and planning policies that will guide future development and land use across Haringey. The importance and purpose of the Local Plan are outlined in Section 6.5 of this report.

9.2 The Council's current Local Plan documents were adopted in July 2017. Subject to Cabinet approval and a successful examination process, the new Local Plan will replace the existing adopted Local Plan.

9.3 Preparation of the new Local Plan commenced in 2020. Since then, the Council has incurred expenditure of approximately £440,000 on evidence base studies, consultation activities, and other costs associated with the plan-making and examination process. These costs have been funded through the Spatial Planning service budget and external grants secured from the Ministry of Housing, Communities and Local Government.

9.4 Further expenditure of up to £200,000 is anticipated to support consultation activities and the examination process, including fees payable to the appointed Planning Inspector. These costs will be funded from the service budgets committed for the Local Plan, and external grants from MHCLG. The Proposed Submission Local Plan will provide the strategic framework for delivering the Council's vision for the borough, setting out a comprehensive

placemaking approach to guide future growth and development across Haringey.

9.5 The Plan will contribute to the delivery of all six priorities within the Borough's Vision by establishing a robust planning policy framework to support sustainable development, investment, regeneration, housing delivery, environmental improvements, and the creation of thriving communities.

Legal

9.6 The Director of Legal and Governance has been consulted in the preparation of this report. As the new Local Plan has progressed through the statutory stages of preparation, it has been the subject of a number of previous reports. The most recent was to Cabinet on 16 September 2025 seeking approval to consult on the draft Local Plan in accordance with regulation 18 of the Regulations.

9.7 This report now seeks Cabinet approval of the updated Local Development Scheme and seeks a recommendation from Cabinet to Full Council that the Proposed Submission Haringey Local Plan be approved for public consultation.

9.8 The decision to approve the Local Development Scheme and all Local Development Documents is an Executive decision that can be exercised by Cabinet in accordance with Part 3, Section C of the Constitution. The Constitution reserves the approval of Development Plan Documents, including the Local Plan prior to submission to the Secretary of State, to Full Council (Part 3, Section B of the Constitution).

9.9 The Director of Legal and Governance notes that the recommendations include delegated authority for the Director of Built Environment & Highways, in consultation with the Cabinet Member for Housing, to make minor, non-material amendments to the Proposed Submission Local Plan and supporting documents prior to publication and, following consultation, prior to submission to the Secretary of State, provided such amendments do not materially alter the Plan's strategy, policies or site allocations.

9.10 The statutory requirements and national planning policies/guidance to be followed/have regard to in respect of the preparation and consultation on the draft new Local Plan are set out in detail, in paragraph 6 of this report.

9.11 Cabinet is asked to note the consultation responses received during the Regulation 18 draft Local Plan consultation and the Council's response to those comments. In considering the recommendations, Cabinet should have regard to those representations and the officer assessment of them as set out in Appendix B. The Courts have held that a decision maker must consider consultation responses with 'a receptive mind' and be prepared to change course if persuaded by a response, but is not under a duty to adopt the views of consultees.

Equality

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

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advance equality of opportunity between people who share those protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not.

9.13 An Equality Impact Assessment (EqIA) has been undertaken to assess the likely impacts of the Proposed Submission Local Plan on people with protected characteristics and those experiencing socioeconomic disadvantage. The EqIA concludes that the plan is expected to have predominantly positive impacts across protected groups through the delivery of affordable housing, accessible and adaptable homes, inclusive design, improved access to employment and training opportunities, enhanced community infrastructure, public realm improvements, sustainable transport measures and improved access to green infrastructure and open space. These measures are expected to particularly benefit disabled people, older people, children and young people, women, ethnic minority communities and lower-income households.

10 Use of Appendices

Appendix A; Local Development Scheme November 2026
Appendix B: Draft Local Plan Consultation Report
Appendix C: Proposed Submission Local Plan
Appendix D: Proposed Submission Local Plan Policies Map
Appendix E: Integrated Impact Assessment (IIA) of Proposed Submission Local Plan
Appendix F: Strategic Planning Committee comments (to follow 2 November 2026 Strategic Planning Committee)

11 Background papers

Haringey Local Plan (July 2017):

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

London Plan 2021 (March 2021)

Draft London Plan (July 2026)

Local Development Scheme (March 2025)

Haringey 2035: Our Vision (October 2024)

Haringey Corporate Delivery Plan 2024-2026 (July 2024)

Haringey Statement of Community Involvement (2017)