



Haringey Council

Agenda item:

[No.]

Report Title. Haringey's Local Development Framework: Proposed Submission Core Strategy – results of public consultation carried out between 10th May and 21st June 2010.

Report of Niall Bolger Director of Urban Environment

Signed :

MARC DUFFIN @ 29/9/10

Contact Officer : Ciara Whelehan, Team Leader Planning Policy, x5516

Wards(s) affected: ALL

Report for: Key Decision

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

- 1.1. The Council is currently in the final stages of producing its Core Strategy, a spatial planning document setting out the Council's strategic vision for the borough up to 2026.
- 1.2. This report is asking members to consider and approve the suggested minor amendments to Haringey's Proposed Submission Core Strategy as set out in Appendix 1;
- 1.3. To consider and approve a revision to the affordable housing policy, part of Strategic Policy (SP) 2 Housing to go out to public consultation for four weeks, as set out in Appendix 2a;
- 1.4. To consider and approve changes to the employment land designations to go out

to public consultation for four weeks, as set out in Appendix 2b.

- 1.5. Following this four week public consultation the Core Strategy will be reported to Full Council in January 2011 seeking approval for it, and other supporting documentation, to be submitted to the Secretary of State for Independent Examination by the Planning Inspectorate.

2. Introduction by Cabinet Member

- 2.1 The Council is currently in the final stages of producing its Core Strategy, a spatial planning document setting out the Council's strategic vision for the borough up to 2026. The Core Strategy sets out the key policies that will help deliver the vision and related objectives of Haringey's Sustainable Community Strategy (SCS).
- 2.2 This report is asking Cabinet to approve the suggested minor amendments to the Core Strategy, following the final statutory public consultation which took place between the 10th May and the 21st June 2010. In addition, it's asking Cabinet members to consider and approve a revised Affordable Housing policy and changes to employment land designations to go out on a further four week public consultation. This additional consultation is necessary to ensure the Core Strategy is found sound before the Council can submit it to the Secretary of State to be examined by a Planning Inspector.
- 2.3 A LDF cross party Members Advisory Group was established to advise and steer the direction and progress of the Core Strategy and other documents within the LDF. The Group is chaired by the Lead Member for Planning and Regeneration.

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

- 3.1. The Core Strategy needs to take into account other strategies and plans that influence the future development of the borough. The Core Strategy must be prepared in accordance with procedures set out in PPS12 'Local Spatial Planning' and it must be in alignment with the priorities identified in Haringey's Sustainable Community Strategy (SCS).
- 3.2 The Core Strategy will seek to contribute to achieving the vision in the SCS which is:

"a place for diverse communities that people are proud to belong to"
- 3.3 The other strategies relevant to the Core Strategy include:
 - Haringey's Housing Strategy (July 2009);
 - The Local Implementation Plan (LIP) (May 2007);
 - Haringey's Regeneration Strategy (January 2008);

- “Changing Lives” Haringey’s Children and Young people’s Plan 2006-09;
- Haringey’s Greenest Borough Strategy (July 2008);
- Safer Communities Strategy 2008-22; and
- Well - Being Strategic Framework (2007).

4. Recommendations

- 4.1. To approve the suggested minor amendments to Haringey’s Proposed Submission Core Strategy, as set out in Appendix 1;
- 4.2. To approve a revision to the Affordable Housing policy, part of SP2 Housing, and changes to employment land designations to go out on a further four week public consultation, as set out in Appendices 2a and 2b;
- 4.3. That Cabinet give delegated power to the Lead Member for Planning and Regeneration and the Director of Urban Environment to approve subsequent changes to SP2 Housing, the employment land designations and any other minor amendments; and
- 4.4. That Cabinet recommend to Full Council that Haringey’s Core Strategy, a schedule of suggested minor amendments, a revised SP2 Housing, changes to the employment land designations (incorporating changes from the final four week consultation) and other supporting documents are submitted to the Secretary of State to be examined by an Independent Planning Inspector.

5. Reason for recommendation(s)

- 5.1. Following public consultation on the Proposed Submission Core Strategy a number of minor amendments have been suggested. Before these changes are submitted to the Secretary of State they need to be approved by Cabinet. Cabinet approval is also required to carry out a further four week public consultation on the revised Housing policy and changes to employment land designations.
- 5.2. The main body of the Core Strategy sets out the Council’s approach to key strategic spatial planning issues for the future development and regeneration of the borough.
- 5.3. Once adopted, the Core Strategy will replace the Unitary Development Plan and will be the primary Development Plan Document in Haringey’s Local Development Framework.

6. Other options considered

- 6.1. The Core Strategy is a statutory spatial planning document that the Council is

required to prepare under the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Therefore, no other options have been considered.

7. Summary

- 7.1. The Core Strategy is the new spatial plan for Haringey 2011- 2026 and is the primary spatial planning policy document in Haringey's Local Development Framework. The Strategy sets out the Council's vision and key policies for the future development of the borough up to 2026.
- 7.2 The Core Strategy builds on the Regional Plan (the London Plan prepared by the Mayor of London) and seeks to support the Haringey Strategic Partnership in delivering the Sustainable Community Strategy. The Core Strategy is a corporate document that sets out where growth and change will happen in the borough over the coming 15 years and, where possible, identifies the infrastructure needed to support this growth (see Appendix 3). The document also includes a set of 17 key planning policies for a number of borough-wide priorities including; provision of affordable housing, economic prosperity, conservation and heritage, high quality urban design, climate change and provision of open and children's play space.
- 7.3 The Council has consulted extensively at each stage of developing the Core Strategy and has already taken into account a comprehensive evidence base and earlier representations. This is in line with the adopted Statement of Community Involvement.

Background

- 7.4 The Council adopted its Unitary Development Plan in July 2006. The Planning and Compulsory Purchase Act 2004 requires the Council to replace its existing Unitary Development Plan (UDP) with a new Local Development Framework (LDF). The scope of the new planning documents is set out in planning legislation and supporting advice (most significantly PPS12 'Local Spatial Planning'). The status of these documents varies in terms of their legal weight in determining planning applications. Development Plan Documents (DPDs) carry the most weight as these are subject to examination by the Secretary of State. The Core Strategy is the lead document in the LDF as it sets out the overall spatial vision for the borough (see figure below).

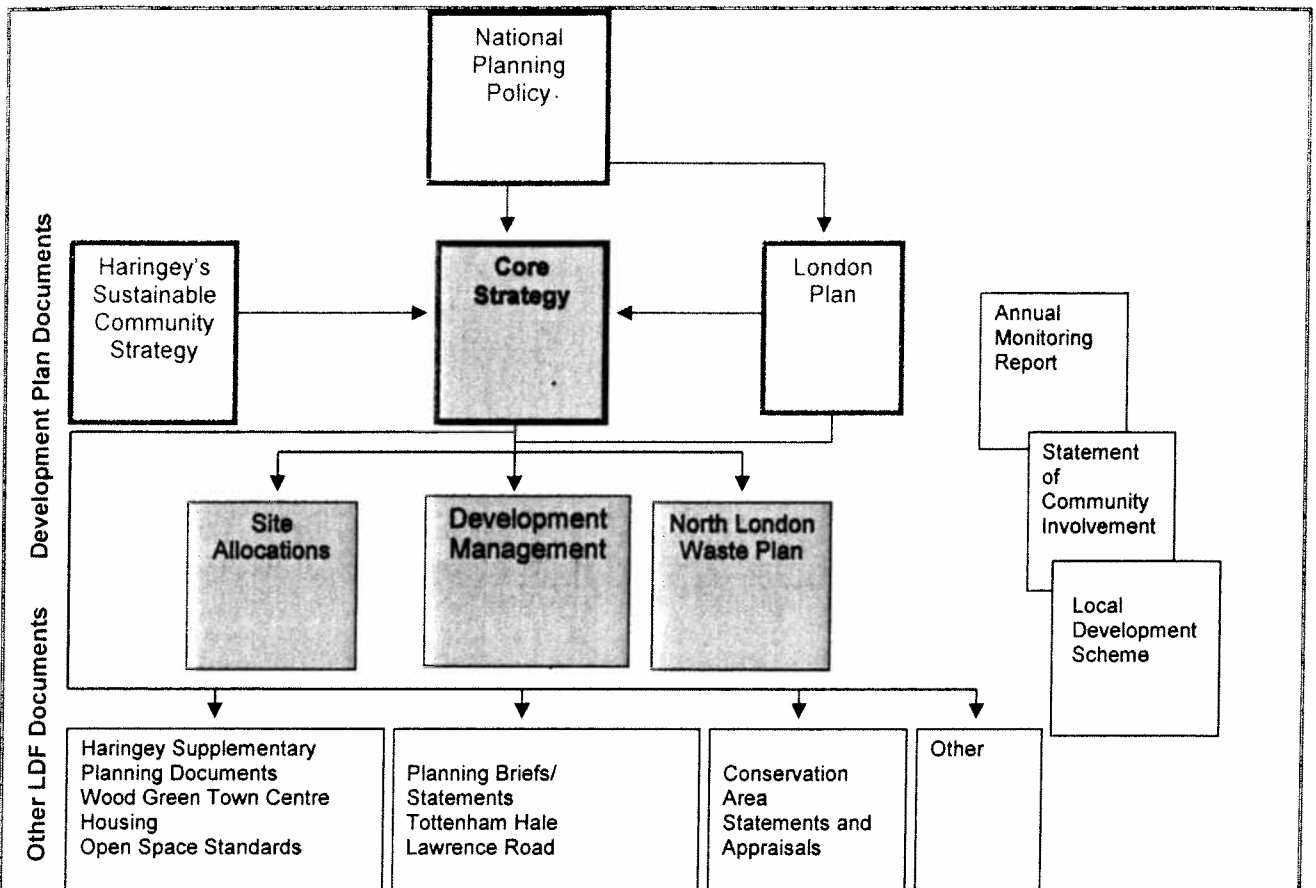


Figure 1: Haringey's Local Development Framework

- 7.5 The Core Strategy will go beyond traditional land use planning and the Unitary Development Plan (UDP) and considers other plans and strategies that influence the use of land and the way that places around us look and work. It will cover the physical aspects of location and land use but also address other factors that make places attractive, sustainable and successful, such as social and economic matters.
- 7.6 The Core Strategy is supported by a Sustainability Appraisal (SA) and an Equalities Impact Assessment (EqIA). These assessments seek to ensure that the principles of sustainable development and equalities are embedded into the Core Strategy. Both documents have been updated to reflect the consultation changes; however, these changes have had no major impact on the sustainability or equalities objectives.
- 7.7 The Core Strategy is also supported by a Community Infrastructure Plan which refers not only to private sector and Council investment and initiatives, but also to planned investment from other service providers, which will help deliver the objectives of the Core Strategy.
- 7.8 The Core Strategy, Sustainable Community Strategy and Local Area Agreement (LAA) documents need to be closely aligned to deliver the Council's strategic objectives. The table below gives examples of how the Core Strategy and planning

policy can achieve the Council's outcomes:

Outcomes	Planning Contribution in 2026
Health & Wellbeing	<ul style="list-style-type: none"> parks, recreation and sports provision, transport, walking and cycling, air quality, access to goods and services, strong economies and access to employment
Combating Climate Change	<ul style="list-style-type: none"> transport, walking and cycling, energy supply, recycling, housing design and renewal, bio-diversity, access to goods and services, minerals and waste, flood risk
Safer Communities	<ul style="list-style-type: none"> licensing decisions, design, landscaping, recreational and sports provision, transport
Vibrant and Sustainable Neighbourhoods	<ul style="list-style-type: none"> housing, strong economies and access to employment, social and community infrastructure, transport, walking and cycling, service co-location, safe and green environments, school provision and design
Social Inclusion	<ul style="list-style-type: none"> equal access to goods and services, transport, strong economies and access to employment, housing quality and housing provision, affordable energy, involving communities in plan making
Economic Development	<ul style="list-style-type: none"> availability of employment sites and access, transport, social and environmental infrastructure, housing – location, accessibility, levels and type of tenure, access to goods and services, energy provision

7.9 The process of developing the Core Strategy is lengthy, and we are now at its final stage. The key stages undertaken to date included:

- Issues and Options consultation – February/March 2008;
- Preferred Options consultation – May/June 2009; and
- Final statutory six week consultation on Proposed Submission – May/June 2010.

The Council has sought to resolve as many policy differences as it can through this consultation process.

7.10 The timescales for the remaining stages in the Core Strategy preparation are as follows:

- Further consultation on latest set of changes to SP2 Housing and employment land designations – October/November 2010;
- Report to Full Council – January 2011;

- Submission to Secretary of State – January/February 2011;
- Independent Examination – March 2011;
- Receive Inspector's Report – September 2011; and
- Adoption – September/October 2011.

Changes to the Core Strategy

7.11 The Council published the Local Development Framework Core Strategy Proposed Submission in May 2010 to seek formal representations on the legal requirements and soundness of the document prior to submission to the Secretary of State for an Examination in Public by an Independent Planning Inspector. 63 formal representations were received from statutory consultees, resident and community groups and individuals, totalling over 700 separate comments. Our analysis of the formal representations received during the consultation shows that the responses fall into two broad categories: minor amendments and fundamental policy changes.

a) Minor amendments requiring a clarification of our policy intent, a correction or improved referencing

A number of minor amendments to the Core Strategy have been proposed. Members are asked to approve these suggested minor changes, as set out in Appendix 1. It is important to note that these amendments simply clarify the Council's policy intent, correct typographical errors, improve referencing or update supporting evidence. None of these amendments significantly affect the policy direction or soundness of the Core Strategy.

A substantial number of representations were received from community and residents' groups in relation to a number of issues including:

- Conservation and improved referencing to PPS5;
- Sustainability/climate change;
- The location of tall buildings;
- Stronger reference to sequential test and flooding;
- The provision of social and community infrastructure;
- Improved referencing to new legislation, e.g. draft Replacement London Plan;

As a result of the above we have made minor policy changes or changes to the supporting text to reflect the representations received. In addition we have made other minor changes which relate to:

- Clarification of policy wording to improve policy intent;
- Typographical errors; and
- General corrections as noticed internally.

b) Fundamental points that seek a change in policy

Representations that made fundamental points about our policy direction, soundness or new evidence base which has been issued following consultation will need to be re-consulted on before the Core Strategy can be submitted to the Secretary of State, to ensure that the document is sound.

In this instance, the affordable housing element of SP2 needs to be revised in light of the findings from the Council's Affordable Housing Viability Study. Members are asked to look at this new policy and approve it so it can go out to a further four week public consultation. Changes to employment land designations are also relevant here.

Affordable Housing

The Core Strategy has been drafted to provide robust, locally distinctive policies for Haringey that do not repeat regional or national guidance. The affordable housing policy within the Proposed Submission Core Strategy stated that schemes of five or more units should provide 50% affordable housing on site. However, the Council's Affordable Housing Viability Study (which was issued after the consultation) recommends that the policy threshold is maintained at ten units.

It is necessary to have an affordable housing policy in the Council's emerging Core Strategy that is viable and achievable. Revising the housing policy to reflect the Council's Affordable Housing Viability Study is essential so that the Core Strategy can be submitted to the Secretary of State for examination and found sound.

Please see Appendix 2a for more detail on this change.

Changes to employment land

The Council has identified a hierarchy of employment land, where certain types of employment uses should be concentrated. These employment areas vary in age, quality and size of buildings, access and the nature of the businesses within them. The Core Strategy has identified the following three categories:

- **Strategic Industrial Land (SIL)** – London Plan designation that has the greatest protection to retain B class uses (business, general industrial and storage or distribution);
- **Locally Significant Industrial Sites (LSIS)** – strong industrial protection, B1, B2 & B8 uses, designated by the Local Planning Authority, has the same level of protection as SIL;
- **Local Employment Areas (LEA)** – also designated by the Local Planning Authority, and have been subdivided into two groups:

1. **Employment Land** – designation to support other employment uses that complement B uses, such as leisure, day nurseries, creative and

cultural industries;

2. **Regeneration Area** - designation to support regeneration and mixed use redevelopment including retail, community and residential uses.

A number of representations were received during consultation seeking clarification on some of the above designations. It is important that we consider the designations above to provide a positive strategic policy for safeguarding employment land, in order to meet our future requirements and to provide locally based employment across the borough up to 2026. The initial review (please see Appendix 2b) is set out in a table and identifies sites that could have their current designations adjusted to adapt to the changing environment around them as well as to acknowledge the uses already there. The process will also identify the sites that require stronger protection to ensure there are sufficient sites to accommodate 'B' class uses.

As well as ensuring there is sufficient land for 'B' class uses, the Council is charged with providing land for other uses which help to create a sustainable community, including leisure, education and social infrastructure. Changes to more flexible designations would release land for some of these uses.

- 7.12 Please note that it will be a matter for the Inspector conducting the Examination in Public to consider our proposed changes, both minor and fundamental. Officers are still meeting with consultees to try to resolve a lot of their objections prior to submission of the Core Strategy.

The Scope of the Independent Examination

- 7.13 Following approval by the Full Council, the Core Strategy will be submitted to the Secretary of State. This begins the examination process. The Planning Inspector will start from the assumption that the plan is sound and is not in need of any fundamental alteration. The Council has carried out its own self assessment of soundness and legal compliance. This will be submitted to the Secretary of State before Examination.
- 7.14 The plan making process is set up to encourage all parties to resolve as many issues as possible prior to the Examination – the Examination is not regarded as the place for people to raise issues for the first time, rather it is where unresolved issues can receive final consideration. The Inspector's expectation will be that early opportunities to be involved should have been taken and the Inspector will consider how the Council has responded to the points made and how we have arrived at the policy positions in the draft. It will be up to the Inspector to determine who will be allowed to appear in person at the Examination hearings.
- 7.15 Although in practice there is some variation across Inspectors, the assumption is that the Inspector will not make any substantial changes to the submitted draft. If a party has made a relevant challenge to the draft, and the Council cannot

reasonably defend its position, the Inspector may either recommend a change, ask the Council to withdraw the Core Strategy from the examination process or find the Strategy to be unsound.

8. Chief Financial Officer Comments

- 8.1. The cost of the consultation process and resulting amendments to the Core Strategy will be met within existing budgets.
- 8.2. An adopted Core Strategy should provide financial benefit to the Council both in terms of providing a firm footing for Section 106 agreements and in encouraging the delivery of Affordable Housing which should help reduce the burden on the Temporary Accommodation budget.

9. Head of Legal Services Comments

- 9.1. The Council is required under the Planning and Compulsory Purchase Act 2004 to prepare a Core Strategy as part of its Local Development Framework (LDF). The Core Strategy will replace the strategic policies and objectives of the saved Unitary Development Plan. The Core Strategy will take forward the priorities of Haringey's Sustainable Community Strategy and other plans to identify a vision for Haringey as a place to live, work and visit.
- 9.2. The process to be followed in preparing the Core Strategy is set out in the Town and Country (Local Development) (England) Regulations 2004. This includes complying with the consultation requirements set out in the regulations, but, it is noted that the Council must also comply with the Council's adopted Statement of Community Involvement. The Council is required to consider any representations made prior to the submission of the documents to the Secretary of State, and the submission must include a statement about how any representations have been taken into account.
- 9.3. Members are reminded that in exercising its functions the Council must have due regard to its obligations under equalities legislation including the obligations under section 71 of the Race Relations Act 1976. This section requires that in carrying out the Council's functions due regard must be had, firstly to the need to eliminate unlawful racial discrimination, and secondly to the need to promote equality of opportunity and good race relations between persons of different racial groups. As such members should note the contents of the Equalities Impact Assessment attached to this report.

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

10.1 n/a

11. Equalities & Community Cohesion Comments

11.1 An Equalities Impact Assessment (EqIA) has been undertaken on the draft Core Strategy and this has been updated to take account of the changes recommended in this report. A copy of the EqIA is attached to this report (Appendix 4). This assessment ensures information on the key equality issues is provided throughout the development of the planning policy document. This is also in line with Haringey's approach to equal opportunities.

11.2 In relation to the 17 Core Strategy policies the EqIA largely concluded that the policies would have a positive impact on all equality strands, however some adverse impacts were identified. It is not considered possible to make changes to overcome these impacts at the policy level, however where equalities issues are identified on a particular application for planning permission there will need to be an assessment of the impacts by the officer or Committee at that stage.

12. Consultation

12.1 The Core Strategy has been subject to extensive consultation during 2008, 2009 and 2010. All stages of public consultation were extensively publicised with newspaper adverts, posters, summary leaflets, workshops and focus group discussions. The responses received from these consultations have contributed to the production of the next stage of the Core Strategy document.

12.2 The Council intends to consult on a further set of changes to the Core Strategy; a revised Housing policy and employment land designations. Following Cabinet approval, this consultation is anticipated to take place in mid October.

13. Service Financial Comments

13.1 The cost of the consultation process and resulting amendments to the Core Strategy will be met within the existing service budget for 2010/2011.

14. Use of appendices

14.1 There are number of documents attached as appendices to this report:

1. Suggested minor amendments;
- 2a. Revised SP2 Housing (part of);
- 2b. Changes to employment land designations;
3. Core Strategy Key Diagram;
4. Equalities Impact Assessment of the Core Strategy; and
5. Differences between the UDP & LDF.

Background papers (available online or on request)

1. Core Strategy Proposed Submission;
2. Sustainability Appraisal of the Core Strategy;
3. Self assessment of soundness; and
4. Self assessment of legal compliance.

15. Local Government (Access to Information) Act 1985

- 15.1. The London Plan, 2008
- 15.2. Haringey Unitary Development Plan, 2006
- 15.3. Haringey Core Strategy Preferred Options "A New Plan for Haringey 2011-2026", 2009
- 15.4. Haringey Proposed Submission Core Strategy, 2010
- 15.5. Haringey's Local Development Scheme, 2010.

Appendix 2a – revised SP2 Housing (part of)

SP2 Housing of the Proposed Submission Core Strategy covers all aspect of housing, from design standards, housing supply and affordable housing. Following updated evidence within the Council's Affordable Housing Viability Study, it is proposed to amend the affordable housing element of SP2 and re-consult on it for a period of four weeks. Suggested wording below:

Secure high quality affordable housing

Affordable housing shall be achieved by:

- Requiring sites capable of delivering ten or more units to meet a borough wide affordable housing target of 50% based on habitable rooms;
- Delivering an affordable housing tenure split of 70% social housing and 30% intermediate housing;
- Ensuring no net loss of existing affordable housing floorspace in development; and
- Ensuring affordable housing units are designed to a high quality and are fully integrated within schemes.

Schemes below the ten unit threshold will be required to provide 20% affordable housing on site, based on habitable rooms, or provide financial contributions towards affordable housing provision.

The preferred affordable housing mix, in terms of unit size and type of dwellings, on individual schemes will be determined through negotiation, scheme viability assessments and driven by up to date assessments of local housing need, as set out in the Housing SPD.



Appendix 2b – Changes to Employment Land Designations (draft)

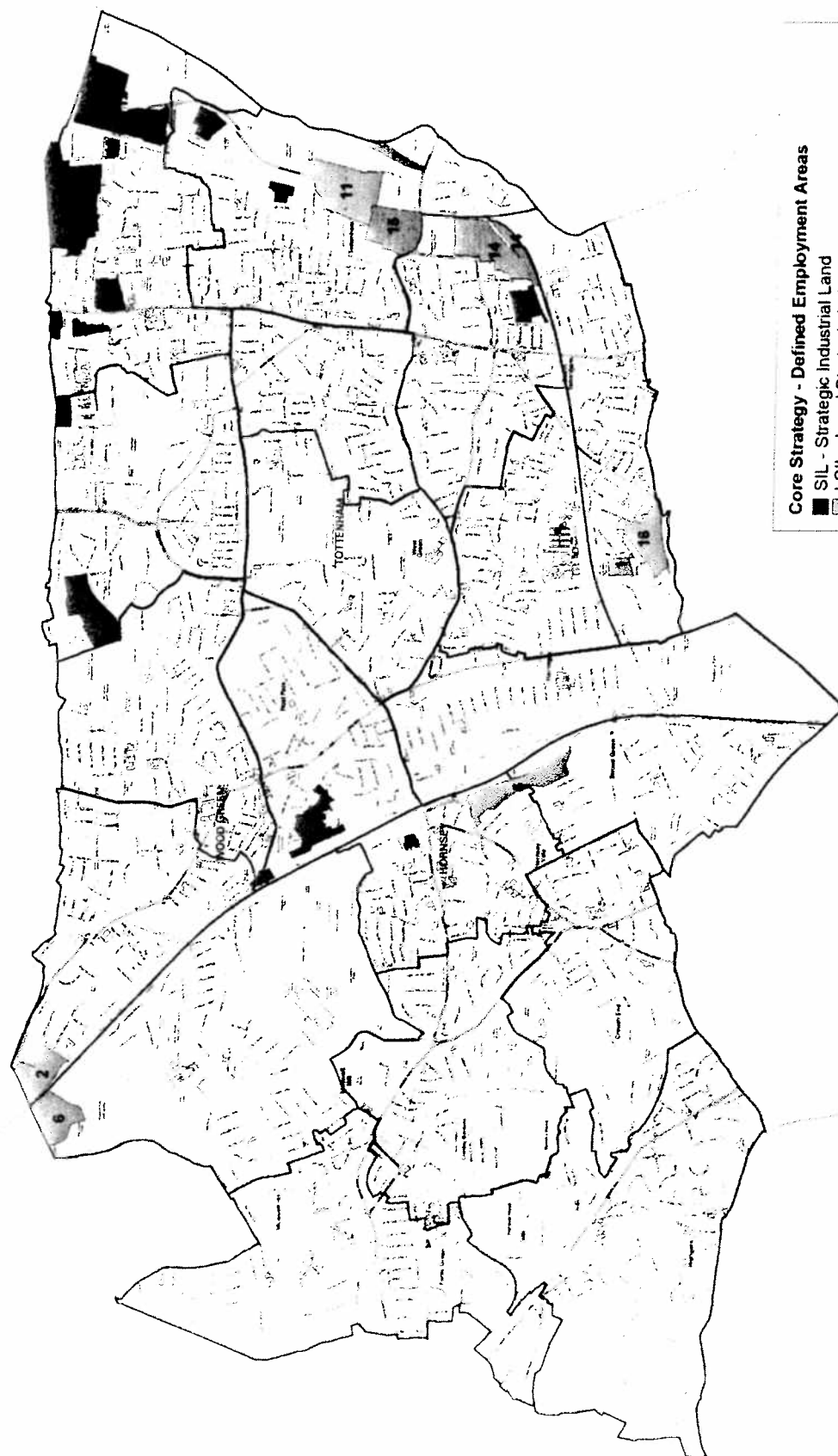
DEFINED EMPLOYMENT AREAS					
UPD NUMBER	NAME	Existing type of DEA	Proposed type of DEA (draft)	AREA (Hectares)	REASON FOR PROPOSED CHANGE
1	Crusader Industrial Estate, N15	IL	LSIL	1.57	No change.
2	Bounds Green Industrial Estate, N11	EL	LSIL	5.52	This change will give greater protection to the site for 'B' class uses.
3	Brantwood Road, N17	IL	SIL	16.93	No change.
4	Campsbourne, N8	RA	LEA - EL	0.55	This change will give greater protection to the site for 'B' class uses and other employment generating uses.
5	Cranford Way, N8	IL	LSIL	7.87	No change
6	Friern Barnet Sewage Works, N10	EL	LSIL	6.2	This re-designation would strengthen role of this site to be used for uses such as recycling centre and waste station, which are 'B' class uses.
7	Hale Wharf, N17	RA	LEA - RA	1.72	No change
8	N17 Studios 784-788 High Road, N17	EL	LEA - EL	2.10	No change subject to planning approval for Spurs redevelopment granted/completion of approved works on site from planning approval which shows the same site is used for employment purposes.
9	High Road West,	IL	LEA - EL	2.58	This change will give greater flexibility for non

DEFINED EMPLOYMENT AREAS					
UPD NUMBER	NAME	Existing type of DEA	Proposed type of DEA (draft)	AREA (Hectares)	REASON FOR PROPOSED CHANGE
	N17				'B' class uses, but these alternative uses must complement the uses within 'B' class.
10	Lindens/Rosebery Works, N17	SEL IL	SIL	1.32	No change
11	Millmead/Ashley Road Extension, N17	SEL RA	SLIL	11.47	Proposed change would greater protect site to be used for 'B' class uses.
12	North East Tottenham, N17	SEL IL	SIL	15.5	No change. Part of Central Leaside.
13	Queen Street, N17	IL	LEA -EL	1.6	This change will give greater flexibility for non 'B' class uses, but these alternative uses must complement the uses within 'B' class.
14	South Tottenham, N17	SEL IL	LEA -RA/EL	9.12	This change will give greater flexibility for non 'B' class uses, but these alternative uses must complement the uses within 'B' class if changed to EL. If the designation is changed to RA, even greater flexibility will occur with uses such as residential and a small element of retail being acceptable.
15	Tottenham Hale	SEL RA	LEA -RA	13.22	No change.
16	Vale Road/Tewkesbury Road, N15	IL	LSIL	6.73	No change
17	White Hart Lane, N17	IL	LEA -EL	8.05	This change will give greater flexibility for non 'B' class uses, but these alternative uses must complement the uses within 'B' class.

DEFINED EMPLOYMENT AREAS					
UPD NUMBER	NAME	Existing type of DEA	Proposed type of DEA (draft)	AREA (Hectares)	REASON FOR PROPOSED CHANGE
18	Willoughby Lane, N17	IL	LEA - RA	1.1	This change would allow non 'B' class uses, including residential and a small element of retail being acceptable within the site. However, this change would conflict with current uses of general industry and offices, according to GLA Study carried out in September. Part of Central Leaside.
19	Wood Green (northern area)	SEL RA	LEA -EL	???	Change would comply with Framework as existing application for southern part of site is predominantly residential. Need to establish exact boundaries and site size, once school site and Phase I development areas are excluded.
20	High Road East, N17	EL	LEA -EL	1.03	No change subject to planning approval for Spurs redevelopment granted/completion of approved works on site from planning approval which shows the same site is used for employment purposes.
21	Marsh Lane, N17	SEL IL	SIL	2.1	No change.
22	Rangemoor Road/Herbert Road, N15	SEL RA	LEA -EL	3.03	Would further strengthen support for and retention of employment uses whilst encouraging complementary uses. As at September 2010, GLA survey identified this DEA as used mainly for warehousing. Site visit on 24/9/10 confirmed DEA is in reasonable condition and dominated by warehouse type buildings and small light industrial units.

Report Template: Formal Bodies

Core Strategy Defined Employment Areas



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