

**UNITARY DEVELOPMENT PLAN  
REPRESENTATIONS ON UDP PROPOSED MODIFICATIONS  
STATEMENT OF DECISIONS AND REASONS**

**PART ONE: STRATEGIC POLICIES**

<b>MOD REF.</b>	<b>ID NO.</b>	<b>REP NO.</b>	<b>UDP POLICY / PARAGRAPH</b>	<b>CONTACT NAME / ORGANISATION</b>	<b>SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE</b>	<b>COUNCIL'S RESPONSE AND REASONS</b>
181	0161	217	Area objectives: Map 2	Avenue Gardens Residents Association	<p>The modification increases the difficulty in interpreting the Area Objectives. The Inspector's recommendation has not been followed to supply an explanation in the reasoned justification as to how the different objectives apply in the overlapping boundaries.</p> <p><u>Suggested change</u> Seeks the restoration of the area designations to Map 2 drawn with no overlapping boundaries or seeks the restoration of the area designations to Map 2 as originally drawn but with the explanation in the reasoned justification as recommended by the Inspector.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> Map 2 has been modified to remove the overlapping area boundaries and to add cross-references to the section on area objectives and policies where the areas are defined.</p> <p>To assist, a map of wards in the borough was added.</p> <p>Reinstating the area boundaries to Map 2 would serve no purpose and would cause confusion.</p> <p>No change to modified Map 2.</p>
7	0242	222	G2a	Mr. Mario Petrou	<p>G2a should incorporate the terms inclusive and access.</p> <p><u>Suggested change</u> G2a to read:</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Inspector recommended that the</p>

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					<p>"Development should be inclusive and of high quality design and contribute to the accessibility and character of the local environment in order to enhance the overall quality, sustainability, attractiveness and amenity of the built environment.</p>	<p>Council to provide a strategic design policy [1.76]. The Council agreed.</p> <p>The policy contains the word "sustainable" which would mean that, by its very nature, it would have to be inclusive and would be taken into account in the mandatory design and access statements for future planning applications as well as the Council's Sustainability Checklist.</p> <p>No change.</p>
10	0478	227	EMP Objective 6	Ofer Acoo, Green N8	<p>The deleted words 'good quality' should be replaced with the word 'suitable'. It may be useful if the wording suggested by the Inspector in modification reference 53 is included in paragraph 3.8, objective 6.</p> <p><u>Suggested change</u>            Reword employment objective 6 to read: "Ensure that a plan – monitor - manage approach is adopted for <u>suitable good quality</u> land and employment premises, and the creation of new ones is assisted where appropriate, <u>providing they do not</u> :</p> <p><u>a) harm the appearance and character of the street scene; or</u></p> <p><u>(b) harm the amenities of local residents."</u></p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The words "good quality" have been removed as all land and premises have a high value in employment terms.</p> <p>Government policy in PPS1, paragraph 23 (Sustainable Economic Development) advises that economic development benefits should be balanced alongside any adverse local impacts. This will be a material consideration when determining planning applications.</p> <p>In any case, criteria are inappropriate for an objective. The two issues of impact on character of the area and residential amenity are addressed by criteria in Policy</p>

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						UD2 'General Principles'.  No change.
11	0242	231	G2	Mr. Mario Petrou	<p>Policy doesn't explain when DPDs will provide updated housing figures.</p> <p><u>Suggested change</u> Policy should explain how the community can get involved in the new planning process, what a DPD is and how and when new housing figures will be arrived at.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> Development Plan Documents must include a Core Strategy, Area Action Plans and any other document which includes a site allocation policy. The UDP is not the appropriate document to set out the timetable or purpose of these documents. The Council's Local Development Scheme sets out a description and timetable for a Core Strategy and a Statement of Community Strategy. The latter sets out how the community can get involved in the new planning process and the preparation of these documents.</p> <p>No further change.</p>
181	0348	238	Area objectives: Map 2	Haringey Federation of Residents Associations	<p>The modification increases the difficulty in interpreting the Area Objectives. The Inspector's recommendation has not been followed to supply an explanation in the reasoned justification as to how the different objectives apply in the overlapping boundaries.</p> <p><u>Suggested change</u> Seeks the restoration of the area designations to Map 2 drawn with no</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> Map 2 has been modified to remove the overlapping area boundaries and to add cross-references to the section on area objectives and policies where the areas are defined.</p> <p>To assist, a map of wards in the borough</p>

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					overlapping boundaries or seeks the restoration of the area designations to Map 2 as originally drawn but with the explanation in the reasoned justification as recommended by the Inspector.	<p>was added.</p> <p>Reinstating the area boundaries to Map 2 would serve no purpose and would cause confusion.</p> <p>No change to modified Map 2.</p>
11	0226	271	G2	Greater London Authority	Support modification to Policy G2	<p>Support noted.</p> <p>No change</p>
11	0195	272	G2	Government Office for London	Maintain objection to this policy. The policy would be met by reinserting the London Plan figure with reference in the supporting text to the recent Housing Capacity Study, the emerging London Plan figure and the fact that the Council will be replacing the UDP review with a Core Strategy DPD.	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Inspector recommends in paragraph 1.82 of his report that "The plan should be modified by the Council deciding what the appropriate housing provision target figure for Haringey should be, and include this figure in [Policy] G2, replacing the meaningless London wide annual target. In doing this, the Council should refer to the new development plan system and how and when the new DPDs would provide a more recent and accurate housing provision figure for Haringey. An alternative approach would be to include the recent Haringey housing target of 6,800 additional homes between 2007/8 and 2016/17 given in the draft Alterations to the London Plan, with the status of such a figure clearly explained. The approach adopted is for the Council to decide in consultation with the GLA. What is urgently</p>

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						<p>required is a borough housing target figure to guide the Council, the Government, the GLA, developers and residents when decisions on housing development are considered.”</p> <p>The Council supports the draft altered housing target for Haringey, which it considers is based on a realistic assessment of capacity. It considers that the current London Plan target is unrealistic and has questioned the methodology used in a housing capacity study published in 2000 on which the target was based.</p> <p>The Council considers that reverting to the current target would be unhelpful and unnecessary. It would not provide a realistic target based on an up-to-date assessment of housing capacity in the borough. As such it would not provide a figure to guide the Council, the Government, the GLA, developers and residents as requested by the Inspector.</p> <p>GLA support the modification to Policy G2 and in the inclusion of the draft revised housing target for Haringey (ref: 0226/271). The GLA advise that the draft altered target supersedes the current London Plan target.</p> <p>The status of the draft altered housing target for Haringey is clarified under Section</p>

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						<p>21A of the Town and Country Planning Act 1990 where the Council are making the permitted assumption that the published proposed alterations to the London Plan have become operative under Section 337(9) of the Greater London Authority Act 1999.</p> <p>Taking the above into consideration, Policy G2 should remain unchanged.</p> <p>However, there is the need to clarify in paragraph 3.7 to status of the draft altered target and the history of the emerging target. Therefore, alter paragraph 3.7 to read:</p> <p>“The London Plan was adopted in 2004. It included borough housing targets based on the London Housing Capacity Study published in 2000. Haringey’s housing target in the London Plan is 19,370 between 1997 and 2016. Since the London Plan was adopted, a London Housing Capacity Study was carried out. This capacity study, published in July 2004, has shown that the borough’s housing potential capacity to be significantly lower than the current London Plan target. The draft altered target for Haringey of 6,800 dwellings between 2007/8 and 2016/17 is based on 2004 housing capacity study and is accepted by the Council and the Greater London</p>

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						Authority as an accurate and realistic assessment of housing potential in the borough. The emerging target forms part of the draft alterations to the London Plan and will be adopted in 2007. Pursuant to Section 21A of the Town and Country Planning Act 1990, the Council make the permitted assumption that the published proposed housing alteration for Haringey has become operative under Section 337(9) of the Greater London Authority Act 1999. Therefore, the draft altered housing target will be used to guide decisions on housing developments in the borough."
1	0226	296	2a.1-2a.4	Greater London Authority/London Development Agency	Paragraph 2a.4 should read: "Councils are required in formulating their policies, to be in general conformity with the London Plan..."	<p><b>Decision</b> Accepted.</p> <p><b>Reason</b> Paragraph 2a.4 states that UDP policies need to have regard to the London Plan.</p> <p>However, a minor change is required to paragraph 2a.4 for clarification to read:</p> <p>Councils are required in formulating their policies <u>to be in general conformity with the London Plan and to have regard to national planning guidance</u> <del>any regional and strategic planning guidance and to current national policies.</del></p>

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10	0226	297	Objective 6	Greater London Authority/London Development Agency	Support the removal of "good quality" from Objective 6.	Support noted. No change

## AREAS OF CHANGE

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20	0491	207	AC1a	Drivers Jonas for National Grid Property Holdings Ltd.	<p>50% affordable housing target cannot always be met on large sites as it may not be financially viable. Other section 106 benefits may be required by the Council, e.g. training and skills programmes.</p> <p><u>Suggested change</u> Policy AC1a to be revised to read as follows: "Supports the London Plan designation as an intensification area, suitable for a business park, potentially achieving 1,500 new jobs and a minimum 1,000 new homes and other uses, which will include a proportion of affordable housing to meet the overall borough target of 50%, and other uses. The actual proportion of affordable housing negotiated on a specific planning application will depend on the site characteristics and the scale and nature of any wider planning benefits that the Council may wish to achieve in</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The proposed modification to criterion a) of Policy AC1 was made in accordance with the Inspector's recommendation [1.35]. The suggested change is already addressed in Policy HSG4 Affordable Housing which states that the proportion of affordable housing negotiated will depend on the location, scheme details and site characteristics. Furthermore, supporting paragraph 4.17c also refers to individual site costs, the availability of public subsidy and other planning requirements in relation to negotiations on affordable housing.</p> <p>Therefore the suggested change is unnecessary.</p> <p>The words "and other uses" has been</p>



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					association with the development".	duplicated in Policy AC1(a) Delete the first "and other uses" from the sentence.
12	0226	267	AC2(e)	Greater London Authority	Although the Council has modified Policy G5 "Strategic Transport Links" to delete the Victoria Line extension, the reference to the Victoria Line extension remains in criterion e) of Policy AC2 "Tottenham International". The reference should be deleted to overcome this inconsistency.	<p><b>Decision</b> Accepted.</p> <p><b>Reason</b> For consistency, a non-material change is proposed for criterion e) of Policy AC2. Therefore, the criterion reads: <del>Achieves an extension of the Victoria Line to Northumberland Park</del> and better rail links along the Lea Valley and through to Stratford.</p> <p>Note: the Council has not accepted the deletion of the Victoria Line extension from the supporting paragraph (7.5m) to Policy M1.</p>
22	0195	298	AC2(a)	Greater London Authority/London Development Agency	Is it possible to update the projections for new homes and jobs to reflect the SRDF. The greater Tottenham Hale International area number of homes is estimated to be 10,000.	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> This is an matter for the Tottenham Hale Masterplan, which will be subject to public consultation and a sustainability appraisal.</p> <p>No further change.</p>

## DEVELOPMENT AND URBAN DESIGN

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32	0161	208	UD3/2.13	Avenue Gardens Residents Association	<p>The Council has not formulated any policy to protect local views. Locally important views have not been identified.</p> <p>The Council has not stated when locally important views will be identified. Grouping identification of local reviews to a review of Conservation Areas is not sufficient. The schedule of local views in the 1998 UDP should be revised and included in the emerging UDP.</p> <p><u>Suggested change</u> New text to paragraph 2.13 to read as follows: "The Council will seek to protect and enhance local views, vistas, panoramas, and views of landmarks. Views to be protected will be identified in consultation with local residents and amenity groups. An initial schedule of local views and landmarks to be protected is included here in a Table (include 1998 UDP Table 9 Schedule of Local Views). Views will be evaluated according to their interests as panoramas, vistas, landmarks, townscapes or special historic interest. Additional views may be identified through the Plan review process, or in Planning Briefs or as SPG".</p> <p>In addition, include new text at the end of</p>	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The Inspector recommended (para 2.121) that the Plan should be modified in paragraph 2.13 by an explanation as to what action the Council intends to take to identify locally important views. The Council agreed with this recommendation and has added a sentence to paragraph 2.13. The additional underlined text below is required clarify that the review will be subject to consultation.</p> <p>"Locally important views will be identified as part of a review of Conservation Areas <u>which will be subject to public consultation.</u> A list of local views will be included in a future Development Plan Document."</p> <p>The list of locally important views in the 1998 adopted plan needs to be reviewed. Therefore, it is not appropriate to include this list.</p> <p>As a result the change to paragraph 12.16 cannot be introduced.</p> <p>No further change.</p>

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					paragraph 12.16 to read: "Examples of routine monitoring and updating of the plan, include for example, updating the table of important local views, an activity that has continued in Haringey since the introduction of the 1998 UDP".	
	0161	219	UD7,8 & 9	Avenue Gardens Residents Association	The deletion of UD7, 8 & 9 must be an error.  <u>Suggested change:</u> AGRA seeks the reinstatement of policies UD7, 8 & 9.	<b>Decision</b> Not accepted.  <b>Reason</b> These policies have been moved to the Movement Chapter.  No change.
41	0346	223	UD12	Helen Steel	Object to the removal of "where, for example, internally illuminated fascia or projecting box signs will not be acceptable". Inclusion of these words do not conflict with PPG19 or with PPG24.  <u>Suggested change</u> In para 2.35 re-instate the words "where, for example, internally illuminated fascia or projecting box signs will not be acceptable"  Add introductory paragraph to UD12: "The Council recognises that advertising hoardings, particularly large billboards, result in a loss of amenity to some extent. This is unacceptable in residential areas and for this reason there will be a	<b>Decision</b> Not accepted.  <b>Reason</b> This Inspector considered this objection and related evidence at the Inquiry and recommended (in paragraph 2.223) the deletion of the sentence in UD12 relating to internally illuminated fascia. The Council agreed with this recommendation.  The Inspector notes in paragraph 2.216 of his report that there is no support for a presumption against new advertisements in PPG19.  It is not considered appropriate to add the word obstruction to paragraph 2.35 as PPG

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					<p>presumption against advertising hoardings in predominantly residential areas. Large poster hoardings will not be permitted outside commercial and industrial estates.”</p> <p>Para 2.35c should be amended to state ‘being sited so as not to cause a hazard <u>or</u> obstruction to pedestrians or road users’.</p>	<p>19 (paragraph 15) states that planning authorities must consider whether a hazard is being created by advertisements when considering impacts on public safety.</p> <p>No change.</p>
32	0242	230	2.13	Mr. Mario Petrou	<p>Incorporating a list of views within a future DPD is not sufficient.</p> <p><u>Suggested change</u> A new schedule of local views should be produced before adoption.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Inspector recommended (paragraph 2.121) that the Plan should be modified in paragraph 2.13 by an explanation as to what action the Council intends to take to identify locally important views. The Council accepted this recommendation and added a sentence to paragraph 2.13.</p> <p>No change.</p>
	0348	239	UD7,8 & 9	Haringey Federation of Residents Associations	<p>The deletion of UD7, 8 &amp; 9 must be an error.</p> <p><u>Suggested change:</u> AGRA seeks the reinstatement of policies UD7, 8 &amp; 9.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> These policies have been moved to the Movement Chapter.</p> <p>No change.</p>
40	0226	265	UD11	Greater London Authority	The amended policy is broadly consistent with the London Plan. It is unclear how	<b>Decision</b> Accepted.

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					<p>clause e) will be applied and as there is no explanation of its intention it may create an onerous presumption against tall buildings which are located near to but have no adverse impact on Green Belt or MOL.</p> <p><u>Suggested Change</u> The policy would therefore benefit from the adoption of supporting text to clarify clause (e), which is consistent with Planning Policy Guidance 2 (PPG2). For example,</p> <p>“The visual amenities of the Green Belt / MOL should not be injured by proposals for development within or conspicuous from the Green Belt / MOL which, although they would not prejudice the purposes of including land in Green Belts/MOL, might be visually detrimental by reason of their siting, materials or design.”</p>	<p><b>Reason</b> The suggested wording is taken from paragraph 3.15 of PPG2. The Plan would benefit from some supporting text to clarify UD11(e). Therefore add the following paragraph as paragraph 2.35:-</p> <p><u>Tall buildings which would be conspicuous from the historic environment, Green belt or MOL locations should not injure the visual amenities of those locations by reason of the siting, materials or design of the tall buildings proposed.</u></p>
39	0226	268	UD10a	Greater London Authority / London Development Agency	<p>The proposed modification to delete UD10a is objected to. This policy should be retained and to be fully consistent with the London Plan, it should be expanded to seek the following:</p> <ul style="list-style-type: none"> <li>• Addressing barriers to work through provision of or contributions towards the cost of childcare and improvements to public transport</li> <li>• Creation of jobs and the provision of education and training for local</li> </ul>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Inspector recommended, in paragraph 2.204 of his report that Policy UD10A be deleted as it is not a land use planning policy. The Council accepted this and as further recommended by the Inspector (paragraph 5.2) placed two of the paragraphs from the supporting text in to UD10A into the introduction to the</p>

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					people <ul style="list-style-type: none"> <li>• Provision of affordable work space</li> <li>• Provision of business space for small and medium enterprises to provide a balanced mix of business and job opportunities.</li> </ul>	Employment chapter. See also representation ref: 0226/2100.  No change.
225	0195	274	UD6	Government Office for London	Support modification to definition of large development and to commitment to review SPG8a.	Support noted. No change
185	0195	283	Table 2.1A	Government Office for London	Support modification to Table 2.1A	Support noted. No change
39	0195	284	UD10a	Government Office for London	Objection withdrawn	Noted.
33	0195	289	2.21	Government Office for London	Support modification to paragraph 2.21.	Support noted. No change
38	0226	299	Table 2.1 & 2.30	Greater London Authority/London Development Agency	Support modification to paragraph 2.30	Support noted. No change
78	0226	2100	2.31b-2.31d	Greater London Authority/London Development Agency	Support the modification to move paragraphs 2.31c and 2.31d to the Employment Chapter.	Support noted.

## ENVIRONMENT

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51	0478	226	ENV5	Ofer Acoo Green N8	The text largely relates to instances where new sensitive development i.e. housing	<b>Decision</b> Partially accepted.

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					<p>schools etc. is proposed <b>near</b> a sources of noise pollution. But it gives very little guidance on how to determine cases where a new noise source will be introduced into an area which is an existing sensitive development like housing and schools etc.</p> <p>Development with Potential New Noise Source (New Noise Sensitive Development). The lack of appropriate guidance on this matter can potentially create a vacuum, which can be exploited particularly by large developers, who are looking to operate in DEAs bordering dense residential areas.</p> <p><u>Suggested change</u> Reword policy ENV5M to read: "The Council will ensure that new noise sensitive development is located away from existing, or planned sources of noise pollution. Potentially noisy developments should only be located in areas where ambient noise levels are already high (and or) - <u>be 10db under existing ambient noise levels, measured in the nearest receptor point to the proposed site.</u> (As set out in the London plan and ppg24) <del>and</del> <u>Same criteria will apply</u> where measures are proposed to mitigate its impact.</p>	<p><b>Reason</b> Policy ENV5M ensures that potentially noisy development is located in areas where ambient levels are already high and where measures are proposed to mitigate its impact.</p> <p>Although paragraph 3.14a refers to separating new noise sensitive development from major noise sources, it does not address new noisy development proposals in existing noise sensitive areas.</p> <p>Therefore, a minor change to paragraph 3.14a is appropriate to read:</p> <p>Noise pollution has a major effect on amenity and health and therefore the quality of life in general. Its effect can be minimised by separating new noise sensitive development from major noise sources, <u>by separating new noisy development from existing noise sensitive development</u> and by taking measures to reduce any impact. The Council will support new technologies and encourage sensitive design and construction, for example by positioning buildings and landscaping as noise barriers. Noise sensitive development includes housing, schools and hospitals.</p> <p>Paragraph 4 of Annex 1 of PPG24 states</p>

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					<p><b>3.14a</b> Noise pollution has a major effect on amenity and health and therefore the quality of life in general. Its effect can be minimized by separating new noise sensitive development from major noise sources, <u>and equally separating new noisy development from existing noise sensitive development, (like housing)</u> In such cases <u>the impact should be assessed and measures taken to reduce any impact.</u> The Council will support new technologies and encourage sensitive design and construction, for example by positioning buildings and landscaping as noise barriers. Noise sensitive development includes housing, schools and hospitals.</p> <p><b>3.14b</b> In assessing planning applications the Council will have regard to PPG24 'Planning and Noise' and the noise levels set out in Annex 1. Where new noise sensitive development is proposed in areas already the reasons given in the Inspector's Report, paragraph 16.3.</p> <p>Alternatively separate the 2 type of cases into 2 separate paragraphs:</p> <p><b><u>3.14c When introducing new noise source into an existing noise sensitive area:</u></b></p> <p><u>Its effect can be minimized by separating</u></p>	<p>"That the Noise Exposure Categories For Dwellings procedure is only applicable where consideration is being given to introducing residential development into an area with an existing noise source, rather than the reverse situation where new noise sources are to be introduced into an existing residential area." Paragraph 3 advises that the impact of industrial noise should be assessed on an individual basis.</p> <p>Paragraph 5 states that where new industrial or commercial development is proposed near a residential area the effect of the new noise source on the surrounding area will have to be assessed, for example by an Environmental Assessment.</p> <p>Paragraph 19 of Annex 3 states that the likelihood of complaints about noise from industrial development can be assessed. It refers to BS 4142 which states that a 10dB difference from background levels (L<sub>90</sub>) is likely to give rise to complaints.</p> <p>Paragraph 4E.11 of the Mayor of London's Ambient Noise Strategy states that "Industrial noise control has had two main goals - avoiding exceeding desirable absolute noise levels, such as set out in guidelines produced for the World Health Organisation, PPG24 and BS 8233; and avoiding noise which is considered likely to</p>



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					<p><u>new noisy development from existing noise sensitive development, (like housing)</u></p> <p><u>Potentially noisy developments should only be located in areas where ambient noise levels are already high (and or) - be 10db under existing ambient noise levels, as measured in the nearest receptor point to the proposed site. (As set out in the London plan and ppg24) and Same criteria will apply where measures are proposed to mitigate its impact.</u></p> <p>In cases where separation is not applicable, the impact of noise should be measured by assessing the predicted noise levels; along side an assessment of existing ambient noise levels</p>	<p>give cause for complaint, as set out in BS 4142. However, there is also the question of preventing a gradual upward creep in background noise levels. Avoiding creep could require new sources to be 10 dB below the background [level] ... though judgement needs to be exercised in relation to local circumstances.”</p> <p>Therefore, both PPG24 and the Mayor’s Ambient Noise Strategy advise that the impact of new noise sources, including industrial development, should be addressed on an individual basis. Sustainable development requires a pragmatic approach to be taken in the local context including the prevention of a gradual upward creep in background noise levels.</p> <p>Therefore, a minor change to paragraph 3.14b is appropriate to read:</p> <p><u>In assessing planning applications the Council will have regard to PPG24 ‘Planning and Noise’ and the noise levels set in (Annex 1), and the Mayor of London’s Ambient Noise Strategy and the prevention of a gradual upward creep in background noise levels. Potentially noisy developments should only be located in areas where ambient noise levels are already high. In cases where separation is not possible, the impact of noisy</u></p>

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						<u>development on ambient noise levels should be assessed, for example by an Environmental Assessment, the application of Best Available Techniques and relevant technology and design guidance.</u> Where new noise-sensitive development is proposed in areas already exposed to high ambient noise levels, the Council may require the submission of an acoustic report to comply with PPG24. Mitigation measures will be secured by planning conditions or planning obligations <u>where appropriate.</u> <u>The issue of measures to control noise from restaurants, cafes, drinking establishments and hot food takeaways is addressed in Policy TCR5.</u>
47	0196	258	ENV1R / paragraph 3.6e	The Environment Agency	Support modification to paragraph 3.6e.	Support noted. No change
48	0196	259	ENV2A	The Environment Agency	Support modification to Policy ENV2A	Support noted. No change
50	0226	269	ENV5M	Greater London Authority	Support new Policy ENV5M 'Noise Pollution'	Support noted. No change
	0195	275	ENV8R	Government Office for London	Support modification to Policy ENV8R	Support noted. No change
49	0195	285	ENV2B	Government Office for London	Support modification to Policy ENV2B	Support noted. No change
53	0195	286	ENV5A	Government Office for London	Support modification to Policy ENV5A	Support noted. No change
52	0478	261	ENV5 / paragraph 3.17	Ofer Acoo, Green N8	Object to the sentence 'if planted densely enough, can help towards the mitigation of potential noise nuisance'. The sentence is	<b>Decision</b> Not accepted.

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					<p>too vague and open to interpretation.</p> <p><u>Suggested change</u>            Reword last sentence of paragraph 3.17 to read:            "Tree planting is of some benefit to air quality. <del>and if planted densely enough, can help towards the mitigation of potential noise nuisance.</del></p>	<p><b>Reason</b>            Paragraph 13 of PPG24 refers to "screening by natural barriers" as a measure to mitigate the impact of noise.</p> <p>No change</p>

## HOUSING

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73	0149	203	HSG8	Muswell Hill Conservation Area Advisory Committee	<p>As there is no detailed evidence to say there are no suburban areas in Haringey, there is no justification for departing from the Inspector's recommendation.</p> <p><u>Suggested change</u>            The Inspector's recommendation should be accepted in full.</p>	<p><b>Decision</b>            Partially accepted.</p> <p><b>Reason</b>            The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined</p>

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						<p>in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) a <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition. According to the London Plan, the borough</u></p>

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						<p>is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where</u></p>

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						<u>development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u>
65	0161	209	HSG1/4.6	Avenue Gardens Residents Association	Modified paragraph 4.6 does not explain how the dwelling numbers were calculated for the sites in Schedule 1 and Table 4.1.	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> Modified paragraph 4.6 states that the housing figures were derived from the 2004 London Housing Capacity Study which were then included in Schedule 1 of the plan. As stated in the plan, the figures are indicative and have been updated since the study to reflect planning permissions and development briefs.</p> <p>No change.</p>
71	0161	210	HSG7	Avenue Gardens Residents Association	AGRA objects to the Council's assertion that criteria (b) is unnecessary. The character and appearance of an area is different from the amenity of nearby residents. This is already evident in the plan under policy CLT4 where 'amenity of nearby residents' has a separate status from 'protecting the character of an area'.	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The proposed criteria b) is not necessary as residential amenity is addressed as a general principle for all development in Policy UD2.</p> <p>No change.</p>
73	0161	211	HSG8	Avenue Gardens Residents	The Council does not identify the Central, Urban and Suburban setting areas, as	<p><b>Decision</b> Partially accepted.</p>

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				Association	<p>defined by the London Plan on an accompanying map.</p> <p>The Council does not explain why the lower ranges in the London Plan for suburban areas do not apply in Haringey.</p> <p>The Council is not observing the London Plan definitions in its considerations of the different character settings for Haringey. The Council are also making incorrect use of the character map set out in the 2004 London Housing Capacity Study.</p> <p>The site setting definitions used in the 2004 London Housing Capacity Study are not those of the London Plan and are not consistent with it. The map does not accurately set out the Central and Urban settings in Haringey.</p> <p>Modified paragraphs 4.27a and 4.27b do not state how the design and height of buildings will be controlled.</p> <p>Criteria b) to e) have not been endorsed by the Inspector. The Council has failed to adequately respond to the Inspector's objections to HSG8.</p> <p><u>Suggested change</u> HSG8 to read: "Density for new residential development</p>	<p><b>Reason</b> The GLA's representation to the UDP Modifications states that Haringey should define their own density zones. The character map in the 2004 London Housing Capacity Study is not Mayoral approved guidance and does not give a clear indication of the appropriate density for different parts of the borough.</p> <p>The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table</p>

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					<p>shall be in the following ranges:</p> <ul style="list-style-type: none"> <li>a) mostly flats in the Central areas 650-1100hrh;</li> <li>b) terraced houses and flats in the Urban area 200-450hrh;</li> <li>c) flats in the Urban areas 450-700hrh;</li> <li>d) detached and linked houses in the Suburban area 150-200hrh.</li> </ul> <p>The Central, Urban and Suburban areas of Haringey are identified and shown clearly on an accompanying map.</p> <p>All new development will be carefully designed and compatible with the appearance and character of the surrounding area and its buildings, and should be well related to public transport and public service provision".</p> <p>The character settings, as set out in the London Plan, should be identified in the reasoned justification and shown clearly on an accompanying map.</p>	<p>4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) a <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u> <del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix</p>



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						<p>which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0161	212	HSG8	Avenue Gardens Residents Association	The London Plan does not state that Haringey is predominately Urban. There are extensive areas of suburban setting in the borough, paragraph 4.27c is incorrect	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b></p>

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					<p>in asserting that Haringey only contains urban and central settings.</p> <p>The Council is not observing the London Plan definitions in its considerations of the different character settings for Haringey. The Council are also making incorrect use of the character map set out in the 2004 London Housing Capacity Study.</p> <p>The site setting definitions used in the 2004 London Housing Capacity Study are not those of the London Plan and are not consistent with it. The map does not accurately set out the Central and Urban settings in Haringey.</p> <p>The character settings, as set out in the London Plan, should be identified in the reasoned justification and shown clearly on an accompanying map.</p> <p><u>Suggested change</u> Revised paragraph 4.27c to read: “New development should be compatible with the existing pattern of development and character of an area. According to the London Plan, the borough consists of site settings shown in the accompanying map. Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL).”</p>	<p>The GLA's representation to the UDP Modifications states that Haringey should define their own density zones. The character map in the 2004 London Housing Capacity Study is not Mayoral approved guidance and does not give a clear indication of the appropriate density for different parts of the borough.</p> <p>The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p>

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					<p>Council to provide an accompanying map setting out the different site settings as set out in the London Plan.</p>	<p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) an <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u></p> <p><del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p>

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						<p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0242	219	HSG8	Mr. Mario Petrou	<p>The proposed policy fails to justify high density figures as stated in paragraph 4.185 of the Inspector's Report.</p> <p><u>Suggested change</u> Explain the London Plan's justification for</p>	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The modified HSG8 does properly reflect the London Plan as recommended by the</p>

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					<p>imposing higher density figures on Haringey and lower ranges on other boroughs such as Kingston, Richmond.</p>	<p>Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) a <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible</p>

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						<p>with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u> According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average</u></p>

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						<p><u>habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0242	220	HSG8	Mr. Mario Petrou	<p>The new density ranges in HSG8 will change Haringey's character. The figures are more than 3 times the previous figures in the 1998 UDP.</p> <p><u>Suggested change</u> Explain how the density jump from the 1998 UDP evolved. Policy HSG2 of the 1998 UDP should be used.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> Policy HSG8 has been drafted to reflect national policy guidance, to conform to the London Plan and to reflect local circumstances. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>This approach will ensure the appropriate density on a site-by-site basis. The density ranges in adopted Policy HSG2.2 do not</p>

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						reflect national policy guidance, or the London Plan, and would not ensure best use of land in the borough or fulfil regeneration objectives.  Therefore, no change.
73	0242	221	HSG8	Mr. Mario Petrou	HSG8 modifications do not reflect the Inspector's recommendation set out in paragraph 4.186. Suburban setting is not explained.  <u>Suggested change</u> Show the full ranges and types in the policy.	<b>Decision</b> Partially accepted.  <b>Reason</b> The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.  The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.



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						<p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) an <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u></p> <p><del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p>

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						<p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0343	260	HSG8	Bob Maltz	The Council does not identify the Central, Urban and Suburban setting areas, as defined by the London Plan on an accompanying map.	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The GLA's representation to the UDP</p>

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					<p>The Council does not explain why the lower ranges in the London Plan for suburban areas do not apply in Haringey.</p> <p>The Council is not observing the London Plan definitions in its considerations of the different character settings for Haringey. The Council are also making incorrect use of the character map set out in the 2004 London Housing Capacity Study.</p> <p>The site setting definitions used in the 2004 London Housing Capacity Study are not those of the London Plan and are not consistent with it. The map does not accurately set out the Central and Urban settings in Haringey.</p> <p>Modified paragraphs 4.27a and 4.27b do not state how the design and height of buildings will be controlled.</p> <p>Criteria b) to e) have not been endorsed by the Inspector. The Council has failed to adequately respond to the Inspector's objections to HSG8.</p> <p><u>Suggested change</u> HSG8 to read: "Density for new residential development shall be in the following ranges: e) mostly flats in the Central areas 650-1100hrh;</p>	<p>Modifications states that Haringey should define their own density zones. The character map in the 2004 London Housing Capacity Study is not Mayoral approved guidance and does not give a clear indication of the appropriate density for different parts of the borough.</p> <p>The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map,</p>

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					<p>f) terraced houses and flats in the Urban area 200-450hrh;  g) flats in the Urban areas 450-700hrh;  h) detached and linked houses in the Suburban area 150-200hrh.</p> <p>The Central, Urban and Suburban areas of Haringey are identified and shown clearly on an accompanying map.</p> <p>All new development will be carefully designed and compatible with the appearance and character of the surrounding area and its buildings, and should be well related to public transport and public service provision".</p> <p>The character settings, as set out in the London Plan, should be identified in the reasoned justification and shown clearly on an accompanying map.</p>	<p>minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) an <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u> <del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address</p>

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						<p>the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
178	0346	225	HSG4 & Glossary	Helen Steel	Object to the deletion of the words "The affordable housing should achieve weekly outgoing levels appreciably below the minimum cost of market housing and should be available in perpetuity for those in housing need", and to the definitions added. The form of words set out which	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The modified definition of affordable housing is in line with the London Plan. The definition is concise and adds clarity.</p>

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					<p>replace the above sentence do not adequately address the issue of affordability and the need for secure housing. The definitions added do not clarify matters and instead make the 'affordability' issue more vague and unspecific.</p> <p><u>Suggested change</u>            Modify the wording to read:            "Housing which is attainable to buy/rent for those people's whose incomes are insufficient to allow them to afford to buy / rent locally on the open market. Rents / prices for affordable housing should be set at levels appreciably below the minimum cost of market housing and should be available in perpetuity for those in housing need."</p> <p>Social Housing:            "Housing provided by an organisation such as a local authority or housing association which allocates accommodation on the basis of need. Such dwellings will normally be for rent at an affordable level or shared ownership. Other types of housing which qualify as social housing include subsidised low-cost home ownership where a public body, such as a local authority, retains a permanent interest as a landowner, hence ensuring that dwellings continue to meet pressing</p>	<p>No further change</p>

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					housing needs in the future".	
73	0242	229	HSG8	Mr. Mario Petrou	<p>Higher density ranges not acceptable. There are suburban areas in Haringey, therefore, lower density ranges would be expected.</p> <p><u>Suggested change</u> Change the plan's density ranges to correspond to the 1998 UDP.</p>	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p>

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						<p>a) a <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u> <del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing</p>



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						<p>type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0348	233	HSG8	Haringey Federation of Residents Associations	<p>The Council does not identify the Central, Urban and Suburban setting areas, as defined by the London Plan on an accompanying map.</p> <p>The Council does not explain why the lower ranges in the London Plan for suburban areas do not apply in Haringey.</p> <p>The Council is not observing the London</p>	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The GLA's representation to the UDP Modifications states that Haringey should define their own density zones. The character map in the 2004 London Housing Capacity Study is not Mayoral approved guidance and does not give a clear</p>

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					<p>Plan definitions in its considerations of the different character settings for Haringey. The Council are also making incorrect use of the character map set out in the 2004 London Housing Capacity Study.</p> <p>The site setting definitions used in the 2004 London Housing Capacity Study are not those of the London Plan and are not consistent with it. The map does not accurately set out the Central and Urban settings in Haringey.</p> <p>Modified paragraphs 4.27a and 4.27b do not state how the design and height of buildings will be controlled.</p> <p>Criteria b) to e) have not been endorsed by the Inspector. The Council has failed to adequately respond to the Inspector's objections to HSG8.</p> <p><u>Suggested change</u> HSG8 to read: "Density for new residential development shall be in the following ranges:</p> <ul style="list-style-type: none"> <li>a) mostly flats in the Central areas 650-1100hrh;</li> <li>b) terraced housed and flats in the Urban area 200-450hrh;</li> <li>c) flats in the Urban areas 450-700hrh;</li> <li>d) detached and linked houses in the</li> </ul>	<p>indication of the appropriate density for different parts of the borough.</p> <p>The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) a <u>central</u> area with good public</p>

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					<p>Suburban area 150-200hrh. The Central, Urban and Suburban areas of Haringey are identified and shown clearly on an accompanying map.</p> <p>All new development will be carefully designed and compatible with the appearance and character of the surrounding area and its buildings, and should be well related to public transport and public service provision".</p> <p>The character settings, as set out in the London Plan, should be identified in the reasoned justification and shown clearly on an accompanying map.</p>	<p>transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u> <del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p>

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						<p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0348	234	HSG8	Haringey Federation of Residents Associations	<p>The London Plan does not state that Haringey is predominately Urban. There are extensive areas of suburban setting in the borough, paragraph 4.27c is incorrect in asserting that Haringey only contains urban and central settings.</p> <p>The Council is not observing the London Plan definitions in its considerations of the different character settings for Haringey. The Council are also making incorrect use of the character map set out in the 2004</p>	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The GLA's representation to the UDP Modifications states that Haringey should define their own density zones. The character map in the 2004 London Housing Capacity Study is not Mayoral approved guidance and does not give a clear indication of the appropriate density for different parts of the borough.</p>

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					<p>London Housing Capacity Study.</p> <p>The site setting definitions used in the 2004 London Housing Capacity Study are not those of the London Plan and are not consistent with it. The map does not accurately set out the Central and Urban settings in Haringey.</p> <p>The character settings, as set out in the London Plan, should be identified in the reasoned justification and shown clearly on an accompanying map.</p> <p><u>Suggested change</u>  Revised paragraph 4.27c to read:  “New development should be compatible with the existing pattern of development and character of an area. According to the London Plan, the borough consists of site settings shown in the accompanying map. Appropriate density ranges are related to location, setting in terms of existing building form and massing, and the index of public transport accessibility (PTAL).”</p> <p>Council to provide an accompanying map setting out the different site settings as set out in the London Plan.</p>	<p>The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700 hrha does conform to the London Plan. With regard to ‘suburban’ site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of ‘suburban’. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) a <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately</p>

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						<p>comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first characteristic in the site setting definition.</u></p> <p><del>According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting'. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</del></p> <p>Site setting is only one factor which determines housing density. Other factors include public transport accessibility, housing mix and car parking provision. Table 4B.1 of the London Plan is a matrix which includes all these factors.</p> <p>Insert new paragraph (as 4.27d) to address the relationship (as set out in Table 4B.1 of the London Plan) between public transport accessibility, car parking provision, housing type in determining density.</p> <p><u>The Housing Needs Assessment required under the Housing Act 2004 will guide the</u></p>

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						<p><u>appropriate housing mix for planning purposes. Table 4B.1 in the London Plan includes both parking provision and average habitable rooms per dwelling in its density ranges. In the case of car free developments in locations where car parking is controlled and there is high PTAL rating, density may be appropriate at the higher end of the range if the development proposal comprises of predominately one and two-bedroomed flats and is appropriately related to the setting of existing building form and massing. Where development has car parking and amenity space on site and includes a proportion of the higher average habitable rooms per dwelling the density will need to be adjusted.</u></p>
73	0338	245	HSG8	Liberal Democrats	<p>Object to the Council's statement that there are no Suburban areas in Haringey. The UDP should explain that large proportions of the borough are suburban and that lower housing figures apply.</p> <p><u>Suggested change</u> The character settings of the borough should be mapped.</p>	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The modified HSG8 does properly reflect the London Plan as recommended by the Inspector. The Council has chosen not to repeat the habitable rooms and dwellings per hectare matrix and density ranges in the London Plan, but to include a general policy range and move to a more design-led site specific approach to density.</p> <p>The general density range of 200 – 700</p>

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						<p>hrha does conform to the London Plan. With regard to 'suburban' site setting as defined in paragraph 4.47 of the London Plan, the Council has not identified which areas of the borough would fall under the definition of 'suburban'. However, given the nature of development in the borough and the fact that the Council requires 2/3rds of new housing to be 1 and 2 bed units, new development in a suburban site setting is likely to be predominately of terraced houses and flats. Therefore, applying Table 4B.1, a minimum of 200 hrha is appropriate.</p> <p>However, due to the absence of a map, minor changes is required to criterion a) and paragraph 4.27c to clarify how character will be applied.</p> <p>a) a <u>central</u> area with good public transport accessibility (PTAL levels 4-6, see Map A.1) and predominately comprises flats;</p> <p>New development should be compatible with the existing pattern of development and character of an area. <u>Paragraph 4.47 refers to appropriate density ranges being related to location, setting in terms of existing building form and massing and PTAL index, and then also defines Site Setting with existing very dense, dense and lower density development being the first</u></p>



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						<p>characteristic in the site setting definition. According to the London Plan, the borough is characterised as predominately 'Urban', but contains areas of a 'Central setting'. These areas align with areas of good public transport accessibility (PTAL levels 4-6).</p>
70	0226	262	HSG6	Greater London Authority	The proposed restriction on no more than 20% HMOs and/or flats is unnecessary and unjustified.	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The 20% level in criterion c of Policy HSG6 is justified in the supporting text (paragraph 4.23) as necessary to avoid an over intensification of HMOs and/or conversions in a street which would result in an imbalance of housing types and sizes, in particular a loss of family housing and give rise to on-street parking problems and deterioration in the residential environment.</p> <p>The Council will review this policy and carry out further research as part of the Local Development Framework.</p> <p>No change</p>
73	0226	263	HSG8	Greater London Authority	The reference to the London Plan specifying character in the borough is not correct. The character map in the draft Housing Provision SPG is not in the final Housing SPG. Haringey should define their own density zones referring to the criteria in the London Plan.	<p><b>Decision</b> Accepted.</p> <p><b>Reason</b> The character map is not Mayoral approved guidance and it does not give a clear indication of the appropriate density for</p>

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						different parts of the borough. The Council will define the density areas and aim to produce a detailed character map of the borough as part of the Core Strategy.
178	0226	264	HSG4 & Glossary	Greater London Authority	The intermediate housing definition to refer to income range as in the London Plan and Housing SPG, rather than the current reference to 'substantially below market levels'.	<p><b>Decision</b> Accepted.</p> <p><b>Reason</b> Reword intermediate housing definition to read: "Intermediate provision is sub-market housing, where costs, including service charges, are above target rents for social housing, but where costs, including service charges, are affordable by households on incomes of less than £49,000 (as at September 2005). <i>(This figure has been updated from the London Plan and will be reviewed on an annual basis to reflect changes in income house-price ratios).</i></p>
69	0226	270	HSG4	Greater London Authority	Support modification to paragraph 4.17.	Support noted. No change
60 & 61	0195	276	4.1a	Government Office for London	Support modification to paragraphs 4.6 and 4.1b and the inclusion of Table 4.1.	Support noted. No change
60	0195	284	4.1a	Government Office for London	<p>The revised paragraph is incorrect as it says the London Plan has been altered when the Plan is in fact the subject of a draft Alteration.</p> <p><u>Suggested change</u> Reference to status of London Plan</p>	<p><b>Decision</b> Accepted.</p> <p><b>Reason</b> Reword the second sentence of paragraph 4.1a to read as follows: "The draft London Plan Alterations reflects</p>

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					Alterations to be corrected.	the housing capacity and sets a draft target for Haringey of 6,800 dwellings, or 680 per annum over a ten year period 2007/8 – 2016/17”.
66	0195	277	HSG2	Government Office for London	Support modification as change involves an amendment to Schedule 1 to show which sites in DEAs are suitable for housing, modifying clause a) of policy HSG2 to cross reference the revision to both Schedule 1 and the criteria in EMP3R.	Support noted.  No change
68	0195	278	HSG4	Government Office for London	The Council has not addressed the issue of site size threshold. This is important as it provides clarity for developers and is the approach set out in Circular 6/98 (10 units is 0.3 or 0.4ha)  <u>Suggested change</u> Insert a minimum site size threshold in the first sentence of policy HSG4.	<b>Decision</b> Partially accepted.  <b>Reason</b> Paragraph 4.16a states that affordable housing will be required on sites that are capable of accommodating 10 or more units. Whether a site is capable of providing 10 or more units will be determined by site size and appropriate density levels.  Therefore, it is appropriate to mention, as a guide, a minimum site size threshold in this paragraph.  Add new sentence to end of paragraph 4.16a a to read: “As a guide affordable housing should be provided on sites of 0.3ha or more.”
76	0195	279	HSG10	Government Office for London	The wording “presumption against” conflicts with the normal presumption in	<b>Decision</b> Partially accepted.

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					favour of permission unless there is a reason why it should not be granted. <u>Suggested change</u> Reword policy to say: "Permission will not be granted for conversions in the areas shown, unless a) the proposal complies with (set of criteria) or b) the developer can demonstrate that the proposal would not cause problems (such as car parking, pressure on services)	<b>Reason</b> Reword beginning of policy to read: <u>"Permission will not be granted for conversions in the following areas: .</u>  The modified text in the reasoned justification (paragraph 4.35) deals with issues arising from conversions so no further change is required.
63	0195	288	HSG1(f)	Government Office for London	Support modification as clause (f) of policy has been deleted and a new reference added to the reasoned justification indicating that the Council seeks to ensure that all homes are built to Lifetime Homes standards.	Support noted.  No change

## EMPLOYMENT

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83	0195	280	EMP3R	Government Officer for London	Support modification to Policy EMP3R 'Non Employment Generating Uses'.	Support noted. No change
77	0226	2101	5.6	Greater London Authority/London Development Agency	Support modification to the objective in paragraph 5.6.	Support noted.  No change

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79	0226	2102	5.7, 5.8, 5.12 & 5.19	Greater London Authority/London Development Agency	Support modification to paragraph 5.7	Support noted.  No change
80	0226	2103	5.10	Greater London Authority/London Development Agency	Support modification to paragraph 5.10.	Support noted.  No change
81	0226	2104	5.10	Greater London Authority/London Development Agency	Support modification to paragraph 5.10. However some concern is raised regarding the potential for Haringey Heartlands to provide new homes as well as new jobs.	<b>Decision</b> No change  <b>Reason</b> The issue of new homes and jobs in Haringey Heartlands is a matter for the Haringey Heartlands Masterplan, which will be subject to public consultation and a sustainability appraisal.
82	0226	2105	EMP1	Greater London Authority/London Development Agency	Support modification to Policy EMP1.	Support noted.  No change
83	0226	2106	EMP3R	Greater London Authority/London Development Agency	Support modification to Policy EMP3R.	Support noted.  No change
84	0226	2107	EMP4	Greater London Authority/London Development Agency	Support modification to delete Policy EMP4 and paragraph 5.25a.	Support noted.  No change
85	0226	2108	EMP5c	Greater London Authority/London Development Agency	Support modification to Policy EMP5.	Support noted.  No change

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86	0226	2109	EMP6f	Greater London Authority/London Development Agency	Support modification to Policy EMP6.	Support noted.  No change
87	0226	2110	5.36a	Greater London Authority/London Development Agency	Support modification to paragraph 5.36a.	Support noted.  No change

## TOWN CENTRES AND RETAILING

MOD REF.	ID NO.	REP NO.	UDP POLICY / PARAGRAPH	CONTACT NAME / ORGANISATION	SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE	COUNCIL'S RESPONSE AND REASONS
94	0492	248	TCR1b	Rapleys for Wm Morrison Supermarkets Plc	<p>PPS6 states that impact assessment should only be carried out in developments on edge of centre or out of centre sites, not local centres as stated in TCR1b.</p> <p><u>Suggested change</u> TCR1 should be amended by deleting the requirement to demonstrate no detrimental impact on the vitality and viability of existing centres.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The modification to criterion b) of Policy TCR1 was made in accordance with the Inspector's recommendation [6.57].</p> <p>The justification for this recommendation is given in paragraph 6.53 of the Inspector's report. In addition, paragraph 3.20 of PPS6 requires that where a significant development in a centre would substantially increase the attraction of the centre and could have an impact on other centres, the impact on other centres will also need to be assessed.</p>

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						No change
89	0226	2111	6.5	Greater London Authority/London Development Agency	Support modification to paragraph 6.5.	Support noted.  No change
90	0226	2112	6.5e	Greater London Authority/London Development Agency	Support modification to paragraph 6.5e.	Support noted.  No change
91	0226	2113	6.6b	Greater London Authority/London Development Agency	Support modification to paragraph 6.6b.	Support noted.  No change
92	0226	2114	6.9	Greater London Authority/London Development Agency	Support modification to paragraph 6.9.	Support noted.  No change
93	0226	2115	6.12r	Greater London Authority/London Development Agency	Support modification to paragraph 6.12r. The proposed text could also refer to policy 3D.2 of the London Plan.	<b>Decision</b> Not accepted.  <b>Reason</b> It is not necessary to refer to the London Plan policy. Reference to PPS 6 is sufficient.  No change.
94	0226	2116	TCR1(b)	Greater London Authority/London Development Agency	Support modification to Policy TCR1. Consider amending b) to read "does not harm the vitality and viability of the centre of other centres within the sub region".	<b>Decision</b> Not accepted.  <b>Reason</b> Inserting "within the sub region" into the policy criterion is necessary as "other

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						centres" would include centres in neighbouring boroughs and within the sub-region.  No change.

## MOVEMENT

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12 & 102	0226	267	M1 / paragraph 7.5m	Greater London Authority	Policy M1 should continue to include a reference to WARME, however, the supporting paragraph 7.5m in relation to Policy M1 should delete the reference to the Victoria Line Extension.	<p><b>Decision</b> Partially accepted.</p> <p><b>Reason</b> The reference to WARME in Policy M1 should be reinstated as a non-material change. However, the proposal is now known as the West Anglia Route Development. Therefore, reinstate the criterion to read: "West Anglia Route Development, including additional services and stations between Tottenham Hale and Stratford."</p> <p>The Council has modified Policy M1 by deleting the reference to the Victoria Line extension. However, the Council would still support the proposal should it come forward during the plan period. This statement does not influence any decision taken by</p>



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						<p>Transport for London on the proposal or affect the use of land.</p> <p>No further change.</p> <p>For consistency, a non-material change is required to paragraph 7.5m to delete reference to WARME.</p> <p>Therefore, the fourth sentence of paragraph 7.5m reads: The Council would also support the extension of the Victoria Line to Northumberland Park, <del>West Anglia Route Development (formerly known as WARME)</del>, improvements to the A10/A1010 and improvements to orbital public transport should firm proposals come forward within the Plan period.</p>

## OPEN SPACE

MOD REF.	ID NO.	REP NO.	UDP POLICY / PARAGRAPH	CONTACT NAME / ORGANISATION	SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE	COUNCIL'S RESPONSE AND REASONS
109	0161	213	8.1	Avenue Gardens Residents Association	The sixth sentence in paragraph 8.1 should be explained and not deleted. The Inspector's recommendation for explaining the sentence could be met by the following: "In areas where there is a deficiency in	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The modification to delete the sentence was made in accordance with the Inspector's</p>

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					open space, that is, in areas not within 400m of a Local Park, as specified by the Mayor's Best Practice Guidance: Guide to Preparing Open Space Strategies, the Council will ensure that no open space is lost and, where appropriate, additional provision will be required". This is to be preferred over deletion.	<p>recommendation [8.288]. In paragraph 8.274 of his report, the Inspector states that the sentence is confusing and is unclear in its message. The Council agrees.</p> <p>The Inspector stated at paragraph 8.18 of his report that a policy that states "no loss of open space" is "going too far" and may fetter the preparation of open space standards. The issue of loss of existing open space is addressed by the addition of sentence recommended by the Inspector in paragraph 8.30 of his report.</p> <p>The Council has explained how open space deficiency is defined in response to Inspector's recommendation 8.287.</p> <p>No change.</p>
141	0161	214	OS12c	Avenue Gardens Residents Association	<p>The proposed modification to paragraph 8.44 to justify OS12c does not satisfy the Inspector's objections.</p> <p><u>Suggested change</u> The Council should agree with the Inspector and delete OS12c.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Council proposed a modification to paragraph 8.44 to explain how access to open space might be improved, in accordance with the Inspector's recommendation [8.262].</p> <p>No further change.</p>
138	0346	224	OS11	Helen Steel	The modifications to 8.40a do not adequately summarise the findings of the Haringey Open Space and Sports	<b>Decision</b> Not accepted.

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					<p>Assessment. It does not set out the present shortfall of allotment provision, nor that the 712 plots needed in areas underserved by existing provision is a current need, not a projected need.</p> <p><u>Suggested change</u>            Modify paragraph 8.40a to read:            "The Haringey Open Space and Sports Assessment carried out in 2003 looked at allotment provision in the borough. This identified demand for 425 plots at the time the survey was carried out, and an additional 712 plots from areas underserved by existing provision (such as the central and south-east areas of Haringey). Demographic changes between 2003 and 2016 were expected to lead to demand for a further 444 plots. Some of this demand could be met by a limited number of existing vacant plots following improvements to site management, but overall there is an estimated requirement for up to 1552 additional plots or 31ha of allotment land."</p>	<p><b>Reason</b>            The Open Space and Sports Assessment addresses this issue in considerable detail. It would be impossible to summarise it fully in the UDP. However, it is considered that the sentences in the UDP provide the essence of what is in the Assessment, and the very reference to the Assessment highlights its existence and the document itself can be looked at if further detail is required. The word "existing" provision in reference to the need for an additional 712 plots makes clear that this is a current need and not a projected need, and it is not considered that there is a need to add further explanatory text in relation to this.</p> <p>It is accepted that the paragraph does not provide a figure for the demand for allotments at the time that the Open Space Assessment was carried out (425 on the waiting list at 2003). However, this figure fluctuates over time, even between seasons - there is greater demand in summer - and so that the inclusion of such a figure would not add clarity to the Plan. Furthermore, the allotment review found significant numbers of allotments held by tenants who are not resident in the borough. It is also noted that neighbouring boroughs have vacancies. All these factors would be taken into account when assessing current and projected need.</p>

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						No change.
109	0242	228	8.1	Mr. Mario Petrou	<p>Are Open Space Standards wholly dependent on the Haringey Open Space Strategy being completed? Density standards have risen and open space standards haven't been established.</p> <p><u>Suggested change</u> Include open space standards, even in draft form.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The local open space standards will take some time to prepare, and must be the subject of public consultation and participation. It would have been an impracticable task to produce meaningful standards in the period between the public inquiry and the modifications. The Council is committed to providing local open space standards as part of the Local Development Framework. It is intended that the standards could be prepared as part of a Core Strategy, which will commence in September 2006. As such, the standards will be subject to public consultation and a sustainability appraisal.</p> <p>No change</p>
109	0348	235	8.1	Haringey Federation of Residents Associations	<p>HFRA and Haringey Friends of Parks Forum jointly object to the proposal to remove the RDUDP 8.1 sixth sentence text rather than make a simple amendment and take on board the Inspector's concerns.</p> <p><u>Suggested change:</u> Modified text to read: "In areas where there is a deficiency in open space, that is, in areas not within</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The modification to delete the sentence was made in accordance with the Inspector's recommendation [8.288]. In paragraph 8.274 of his report, the Inspector states that the sentence is confusing and is unclear in its message. The Council agrees.</p>

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					<p>400m of a Local Park, as specified by the Mayor's Best Practice Guidance: Guide to Preparing Open Space Strategies, the Council will ensure that no open space is lost and, where appropriate, additional provision will be required".</p> <p>This is to be preferred over deletion.</p>	<p>The Inspector stated at paragraph 8.18 of his report that a policy that states "no loss of open space" is "going too far" and may fetter the preparation of open space standards. The issue of loss of existing open space is addressed by the addition of sentence recommended by the Inspector in paragraph 8.30 of his report.</p> <p>The Council has explained how open space deficiency is defined in response to Inspector's recommendation 8.287.</p> <p>No change.</p>
141	0348	236	OS12c	Haringey Federation of Residents Associations	<p>The proposed modification to paragraph 8.44 to justify OS12c does not satisfy the Inspector's objections.</p> <p><u>Suggested change</u> The Council should agree with the Inspector and delete OS12c.</p> <p>The proposed modification to paragraph 8.44 is withdrawn and that the text of 8.44 reverts to the form in the RDUDP.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Council proposed a modification to paragraph 8.44 to explain how access to open space might be improved, in accordance with the Inspector's recommendation [8.262]. In order to provide clarity a reference to PPG17 Companion Guide, Section 3, Diagram 1 "Decision Making for Redevelopment of an Existing Open Space or Sports/Recreation Facilities" should be made in criterion e) of Policy OS12.</p> <p>Therefore, criterion e) of Policy OS12 should read:</p>

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						<p>that there has been a robust assessment of existing and future needs of the community as outlined in PPG17 Planning for Open Space, Sport and Recreation under Assessments of Needs and Opportunities, and under Chapter 3 of the Companion Guide, Diagram 1, Redevelopment of an Existing Open Space or Sports/ Recreation Facility.</p> <p>No further change.</p>
144	0348	237	OS14	Haringey Federation of Residents Associations	<p>HFRA and Haringey Friends of Park Forum object to the proposed modifications to paragraph 8.49a as failing to identify an appropriate criteria for open space deficiency, as failing to conform to GLA guidelines, failing to explain why the inappropriate criteria was chosen and failing to conform to the Inspector's recommendations.</p> <p><u>Suggested change</u>  Reword paragraph 8.49a to read:  "The Open Space and Sports Assessment included <u>2 accessibility maps at Figure 4.2 entitled "Pedestrian Accessibility – Local Parks" and 4.3 entitled "Accessibility to District, Metropolitan &amp; Regional Parks"</u>. In accordance with the threshold recommended in the Mayor of London's "Best Practice Guide to Preparing Open Space Strategies", open space deficiency areas are derived by considering</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Open Space and Sports Assessment clearly sets out how open space deficiency was calculated for the purposes of the Assessment. The criteria used was further than 280m from any form of public open space (open spaces where access is restricted are excluded). This criteria is based on the LPAC Open Space Planning Report and the (then) Draft GLA Study. Clearly there are other ways in which open space deficiency could have been calculated, but the threshold of 0.25 ha was chosen and it accords with the advice set out in the Mayor's Best Practice Guide to Preparing Open Space Strategies.</p> <p>Therefore, the modification to paragraph 8.49a satisfies the Inspector's</p>

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					<p>pedestrian access to <u>public open spaces of 2ha or above</u> (regional parks, metropolitan parks, district parks and local parks). Open spaces where access is restricted such as private sports grounds and playing fields were excluded from the <u>Atkins</u> survey.</p> <p>Reword paragraph 8.49b to read:            "Those areas of the borough which are deficient in public open space are defined as those which are further than 280m and 400m from any <u>local park</u>."</p>	<p>recommendation [8.287].</p> <p>No change.</p>
114	0011	241	OS1b	Malcolm Judd & Partners for National Grid Company	Supports the addition of new text to the supporting paragraph of policy OS1B.	Support noted. No change
119	0011	242	OS2A	Malcolm Judd & Partners for National Grid Company	Supports the addition of new text to the supporting paragraph of policy OS2A.	Support noted. No change
131	0011	243	OS4	Malcolm Judd & Partners for National Grid Company	Supports the addition of new text to the supporting paragraph of policy OS4.	Support noted. No change
128	0011	244	OS5	Malcolm Judd & Partners for National Grid Company	Supports the addition of new text to the supporting paragraph of policy OS5.	Support noted. No change
141	0338	246	OS12c	Liberal Democrats	This policy may result in the Council being pressurised to accept development on playing fields by improving access to another piece of open space nearby. As	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b></p>

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					development increases, the value of open spaces will increase.	<p>Policy OS12 has very clear criteria for considering applications to develop open space. Paragraph 8.44 provides the justification to the policy and does not suggest a presumption that playing fields can be built on if access to other open space is provided. Its inclusion does not provide a loophole for pressure to be applied to allow development to go ahead. In addition, paragraph 8.44a has been added to the policy to further strengthen it and points out the provisions of policy OS14 which deals with open space deficiency and new development, and points to Map 8.1 where open space deficiency is identified.</p> <p>No further change.</p>
144	0338	247	8.49a	Liberal Democrats	Open Space Standards are fundamental and it is important that there is a time-scale for their inclusion in the development plan.	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Council are committed to providing local open space standards as part of the Local Development Framework. The standards will take some time to prepare, and must be the subject of public consultation and participation. It is intended that the standards could be prepared as part of a Core Strategy, which will commence in September 2006.</p> <p>No change.</p>



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111	0028	253	OS1B	Thames Water	Support proposed modification (paragraph 8.10b) in relation to Green Belt and utility infrastructure.	Support noted. No change
114	0028	254	OS1A	Thames Water	Support proposed modification (paragraph 8.10g) in relation to Metropolitan Open Land and utility infrastructure.	Support noted.
127	0028	255	OS4	Thames Water	Support proposed modification (paragraph 8.16a) in relation to land adjacent to Green Belt, MOL and SLOL and utility infrastructure.	Support noted.
119	0028	256	OS2A	Thames Water	Support proposed modification (paragraph 8.12d) in relation to Significant Local Open Land and utility infrastructure	Support noted.
111	0226	266	OS1B / paragraph 8.10g	Greater London Authority	The Inspector's recommendation is contrary to PPG2 which states that " <i>Green Belt policies in development plans should ensure that any planning applications for inappropriate development would not be in accord with the plan</i> ". Any inappropriate development within Green Belt or MOL should not be approved unless very special circumstances can be demonstrated.	Partially accepted.  The additional paragraph (8.10g) accords with the Inspector's recommendation [8.57].  Paragraph 3.2 of PPG2 states: "Inappropriate development is, by definition, harmful to the Green Belt. It is for the applicant to show why permission should be granted. Very special circumstances to justify inappropriate development will not exist unless the harm by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations. In view of the presumption against inappropriate development, the Secretary of State will attach substantial weight to the harm to the Green Belt when considering any planning application or appeal concerning such development."

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						<p>Paragraph 3.12 of PPG2 states:            “The statutory definition of development includes engineering and other operations, and the making of any material change in the use of land. The carrying out of such operations and the making of material changes in the use of land are inappropriate development unless they maintain openness and do not conflict with the purposes of including land in the Green Belt.”</p> <p>Therefore, a minor change is required to paragraph 8.10g for clarification to refer to PPG2 –</p> <p>When assessing development proposals on MOL, the operational needs of utility companies should be taken into account. In particular cases, the essential need for new infrastructure may override the need to protect the open character of the MOL. <u>Such development may be treated as very special circumstances in accordance with paragraphs 3.2 and 3.12 of PPG2.</u></p> <p>This change is also required to paragraph 8.10b in relation to Green Belt.:</p> <p>When assessing development proposals on Green Belt, the operational needs of utility companies should be taken into account. In</p>

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						particular cases, the essential need for new infrastructure may override the need to protect the open character of the Green Belt. <u>Such development may be treated as very special circumstances in accordance with paragraphs 3.2 and 3.12 of PPG2.</u> Green Belt in the borough is identified on the Proposals Map and in Schedule 9.
113	0195	290	OS1A	GOL	Support the modified policy OS1A as it fully incorporates the Inspector's recommendation.	Support noted. No change
115	0195	291	OS1B	GOL	Support the modified policy OS1B as it fully incorporates the Inspector's recommendation.	Support noted. No change.

## CREATIVE LEISURE AND TOURISM

MOD REF.	ID NO.	REP NO.	UDP POLICY / PARAGRAPH	CONTACT NAME / ORGANISATION	SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE	COUNCIL'S RESPONSE AND REASONS
151	0195	292	CCT1	Government Office for London	Support modification as new paragraph now accords with PPS6 and it states the correct application of the sequential test.	Support noted.

## COMMUNITY WELLBEING

MOD REF.	ID NO.	REP NO.	UDP POLICY / PARAGRAPH	CONTACT NAME / ORGANISATION	SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE	COUNCIL'S RESPONSE AND REASONS
157	0194	240	CW2	CgMs for Metropolitan Police Association	<p>The reference to specific community facilities such as schools and healthcare in paragraph 10.2 is not wholly consistent with criterion b) of policy UD10 in respect of securing section 106 funds.</p> <p><u>Suggested change:</u> Add 'the emergency services' into paragraph 10.2 to read: "Where development increases the demand for community facilities, such as schools, childcare, <u>the emergency services</u>, and healthcare, the Council will seek to ensure that local facilities and services are able to absorb the additional demand and it will negotiate, where appropriate, a Section 106 agreement to secure the provision of additional facilities and services (see Policy UD10)."</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reason</b> The Council modified criterion b) of Policy UD10 to add "emergency services" to a list of impacts that might arise as a result of development for which a planning obligation could be negotiated. Community facilities was already included in the list.</p> <p>Therefore, criterion b) makes it clear that emergency services are different to community facilities. Paragraph 10.1 of the Community Well-Being chapter defines community facilities as schools, higher education facilities, health centres, childcare providers, places of worship and community halls. It does not include emergency services.</p> <p>Therefore, the suggested change is inappropriate and unnecessary.</p> <p>No change.</p>
	0195	273	CW1	GOL	Support the revised deposit change to criterion a) of Policy CW1.	Support noted.

## CONSERVATION

MOD REF.	ID NO.	REP NO.	UDP POLICY / PARAGRAPH	CONTACT NAME / ORGANISATION	SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE	COUNCIL'S RESPONSE AND REASONS
165	0149	200	CSV3b	Muswell Hill Conservation Area Advisory Committee	<p>This policy has no basis in PPG15 or any other conservation legislation. There is no provision for community aspects to be taken into account when considering applications for either demolition or alterations to buildings in Conservation Areas.</p> <p><u>Suggested change</u> First sentence of the paragraph should be deleted and the third sentence added to the preceding paragraph, "The Council will seek to protect buildings within Conservation Areas..."</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reasons</b> PPG15 clearly states in paragraph 4.27 that "...proposals to demolish such buildings should be assessed against the same broad criteria as proposals to demolish listed buildings" (paragraph 3.16-3.19). As such, the criteria applied to listed buildings are also applicable to buildings in conservation areas. This criteria permits demolition or substantially demolition in very exceptional circumstances if efforts to preserve the building's condition and use have failed. The council recognises that it has not made the issue of exceptional circumstances explicit in the wording of the policy. On that basis the policy will be amended to reflect this in accordance with PPG15.</p> <p>Therefore, a minor clarification is required. Amend the second paragraph of Policy CSV3B to read as follows:</p> <p>In some <u>exceptional</u> cases, if substantial community benefit would result from <del>development, total or substantial</del> demolition or <del>alteration</del> of buildings in Conservation Areas <u>the Council may consider this to be acceptable</u>. Each case will be judged</p>

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						<u>individually on its merits and weighed against arguments in favour of a building's preservation.</u> Further information is available in the Conservation and Archaeology SPG2.
162/164	0161	215	CSV2a	Avenue Gardens Residents Association	<p>The proposed CSV2a does not include the recommended change CSV2f as requested by the Inspector.</p> <p><u>Suggested change</u>  Reword CSV2a to read:  "The Council will require that alterations or extensions to listed buildings:</p> <ul style="list-style-type: none"> <li>a) are necessary and are not detrimental to the architectural and historical integrity and detailing of a listed building's interior and exterior;</li> <li>b) relate sensitively to the original building;</li> <li>c) do not adversely affect the setting of a listed building and</li> <li>d) are subject to listed building consent, where the character of the building is affected." </li></ul>	<p><b>Decision</b> Not accepted.</p> <p><b>Reasons</b>  The Inspector recommended in paragraph 11.85 of his report that Policy CSV5 'Applications for Sites in Conservation Areas and Applications Affecting Listed Buildings should be deleted and that its main messages regarding development control administration be introduced into the reasoned justification of policies CSV1A and CSV1B. The Council agreed with the recommendation.</p> <p>In relation to applications affecting listed buildings, the Council modified paragraph 11.9f by adding a sentence to read:</p> <p>"As such, for development affecting the setting of a listed building, an application for listed building consent should provide full information."</p> <p>Therefore, the suggested change (criterion d) is unnecessary and would conflict with the Inspector's recommendation.</p>

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						No change.
162/164	0161	216	CSV2b	Avenue Gardens Residents Association	<p>The proposed modification to CSV2B is not in accordance with Section 16/11/71 of the Planning (Listed Buildings and Conservation Areas) Act 1990.</p> <p>The change to Objective 20, paragraph 3.12b and paragraph 11.3 is not well founded as well as not being considered by the Inspector.</p> <p><u>Suggested change:</u> CSV2b criterion a) should read: "preserve and enhance the character of the Conservation Area".</p> <p>To be consistent, the original 'preserve and enhance' of objective 20, paragraph 3.12b and paragraph 11.3 key objectives, bullet point 2 are restored.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reasons</b> The modification to criterion a) of Policy CSV2b was made in accordance with the Inspector's recommendation [11.56]. As a consequence, Objective 20 and paragraph 11.3 was modified accordingly.</p> <p>Under Section 72 of the Planning (Listed Buildings and Conservations Areas) Act 1990 there is a statutory duty to preserve or enhance the character or appearance of a conservation area. This is supported by case law.</p> <p>No change</p>
201	0318	252	Table 11.1	Hornsey Historical Society	<p>Object to the deletion of Hornsey Gas Works and the boundary wall at the rear of Wood Green Common. No evidence given to the Inspector to refute the assertion that the artefacts were not of importance.</p> <p><u>Suggested change</u> The reinstatement of both these items on Table 11.1.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reasons</b> The modification to Table 11.1 was made in accordance with the Inspector's recommendation [11.31]. The Council agreed with the recommendation.</p> <p>The Inspector considered the objections and evidence in support of deletion in paragraphs 11.28 and 11.29 of his report.</p>

MOD REF.	ID NO.	REP NO.	UDP POLICY / PARAGRAPH	CONTACT NAME / ORGANISATION	SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE	COUNCIL'S RESPONSE AND REASONS
						No change.
201	0493	251	Table 11.1	Alexandra Park & Palace Conservation Area Advisory Committee	<p>Object to the deletion of Hornsey Gas Works. The gasholder's guide-frame should be protected.</p> <p><u>Suggested change</u> The proposed modification to delete Hornsey Gas Works from Table 11.1 should be withdrawn and the existing reference left in place.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reasons</b> The modification to Table 11.1 was made in accordance with the Inspector's recommendation [11.31]. The Council agreed with the recommendation.</p> <p>The Inspector considered the objections and evidence in support of deletion in paragraphs 11.28 and 11.29 of his report.</p> <p>No change.</p>
162	0494	232	CSV1c	Greater London Industrial Archaeological Society (GLIAS)	<p>The Council did not consult GLIAS over the deletion of Hornsey Gasworks from Table 11.1. The guide frame contributes positively to views from the railway and Alexandra Park.</p> <p><u>Suggested change</u> Reinstate as individual site to read: "Hornsey Gasholder No. 1: Of 1892, with very fine early example of Cutler's Patent helically girdered guide frame. It represents a new approach to the technical design of such structures.</p> <p>Change address to Clarendon Road, N8 and Western Road, N22.</p>	<p><b>Decision</b> Not accepted.</p> <p><b>Reasons</b> The modification to Table 11.1 was made in accordance with the Inspector's recommendation [11.31]. The Council agreed with the recommendation.</p> <p>The Inspector considered the objections and evidence in support of deletion in paragraphs 11.28 and 11.29 of his report.</p> <p>No change.</p>
164	0195	281	CSV2	Government Office for London	Support modification to paragraph 11.12	Support noted. No change



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165	0195	282	CSV3	Government Office for London	Support new Policy CSV3A	Support noted. No change
162	0195	293	CSV1C	Government Office for London	Support modification to Policy CSV1C	Support noted. No change

## IMPLEMENTATION MONITORING AND REVIEW

<b>MOD REF.</b>	<b>ID NO.</b>	<b>REP NO.</b>	<b>UDP POLICY / PARAGRAPH</b>	<b>CONTACT NAME / ORGANISATION</b>	<b>SUMMARY OF REPRESENTATION AND SUGGESTED CHANGE</b>	<b>COUNCIL'S RESPONSE AND REASONS</b>
174	0195	294	IMR4	GOL	Support modification to IMR4.	Support noted. No change