

Comments on the Draft Further Alterations to the London Plan

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<b>PREAMBLE AND INTRODUCTION</b>		
The process for agreeing the further alterations to the plan	The further alterations follow a Statement of Intent which was published in December 2005.	<p>Qualified support. The Statement of Intent set out the policy areas of the London Plan that were to be reviewed. However, there are policy areas which are important to Haringey and identified in the North London Sub-Regional Development Framework which have not been addressed or have been given limited attention. These include:</p> <ul style="list-style-type: none"> <li>• Spatial and land use implications of employment growth projections particularly in London's suburbs</li> <li>• Guidance on the outer London office market and the role of mixed use development</li> <li>• Review and changes to Strategic Industrial Locations</li> <li>• Retail capacity and provision</li> <li>• Review of the town centre network</li> <li>• Education needs</li> <li>• A London wide study of gypsy and traveller accommodation to inform borough targets (to be completed by June 2007). Consultants have now been selected to advise on the Accommodation Need Assessment at Borough, Sub-Regional and London wide levels.</li> </ul>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>The Council notes the list of proposed London Plan Supplementary Guidance in Annex 6. The Mayor is urged to progress this guidance and to indicate a timetable for the revision of the Sub-Regional Development Frameworks.</p> <p>Whilst the early alterations on housing supply, waste and minerals have been included in the further alterations, it is not clear whether the Examination in Public Panel's recommendations on the early alterations have been addressed fully in the further alterations. This should be clarified.</p>
Objective 1	Alterations to key policy directions to give emphasis to climate change, to the Central Activities Zone as a focus for development and to improving suburban areas.	Support the emphasis given to climate change and suburbs. However, it is unclear how an improved economic base will be delivered and how access to employment opportunities across London will be improved.
Objective 2	Alterations to key policy directions to address health inequalities, to ensure that housing mix policies meet the needs of larger households and improve the provision of playspace and facilities for children and young people.	<p>Qualified support. The additional policy direction to ensure that housing mix policies meet the needs of larger households appears not to have been taken forward in Policy 3A.4. The focus on unit volume of housing supply gives insufficient attention to the type and mix of housing provision, particularly the need for affordable family-sized housing. Following meetings between the Leader of the Council and the Mayor of London, the Council seeks reassurance that the issue of family housing is to be given greater emphasis.</p> <p>It is noted that the Greater London Authority Bill requires the Mayor's housing strategy to include a statement of strategic housing investment priorities setting out the amount, type and location of new</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		affordable housing.
Objective 3	Alterations to key policy directions to focus economic growth in the Central Activities Zone, build on the opportunities provided by the 2012 Olympics and Paralympic games and enhance the business environment across London and secure an attractive and safe public realm.	Qualified support. The concentration of economic growth in central London may not be conducive to a polycentric approach which supports growth and investment in outer London.
Objective 4	Alterations to key policy directions to improve the provision of social infrastructure and related services and ensure the legacy of the 2012 Olympic and Paralympic games increases access to facilities from deprived areas.	Qualified support. The North London Sub Regional Development Framework did not provide further detailed information on social, transport and utility infrastructure requirements and the new London Plan policy on the spatial strategy for development (policy 2A.1i) does not fully address the impact of growth on infrastructure and the relationship between the level and pace of development and infrastructure needs and capacity.
Objective 5	Alterations to key policy directions to secure the early completion of Crossrail, strengthen measures to reduce carbon dioxide emissions and the negative impacts of transport on air quality and increase safety and security on the transport system.	Support.
Objective 6	Alterations to the objective and key policy directions to make London an exemplary world city in mitigating and adapting to climate change and achieve design which is safe and sustainable and to protect and increase biodiversity.	Support.
<b>CHAPTER 1 POSITIONING LONDON</b>		
New Policy 1.1 London in its global, European and UK context	New policy to place London in its global, European and UK context and to ensure that all strategic agencies support London's development as the main world city and major gateway to Europe and	Support.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	the UK.	
<p>New Policy 1.2 London and the wider metropolitan region</p> <p>New Policy 1.3 Growth Areas</p>	<p>New policies to coordinate approaches to strategic issues in London and the wider metropolitan region (including the East of England and South East regions) and linkages and capacity in the London-Cambridge-Stansted-Peterborough Growth Area.</p>	<p>Support. The Council will look to the Mayor, the LDA and TfL to coordinate approaches to strategic issues in North London and the East of England region and linkages and capacity in the London-Cambridge-Stansted-Peterborough Growth Area, and more specifically the Upper Lea Valley Opportunity Area.</p> <p>The collaboration between LDA, EEDA and SEEDA on strategic issues identified in paragraph 6.50i is noted.</p>
Paragraph 1.18	<p>The Mayor will also work with regional partners to explore how Londoners can help redress labour market constraints in nearby parts of the wider South East</p>	Support.
Paragraph 1.19	<p>The mitigation of and adaptation to climate change will require co-ordination of policies across the wider metropolitan area</p>	Support.
Paragraph 1.26	<p>TfL has started to reverse a trend of a lack of investment in public transport with a major programme of transport investment already underway and substantial strategic and more local proposals for the future.</p>	Support. Inaccurate cross reference to paragraph 3.160i.
<p>Paragraphs 1.42 – 1.46 Future economic and employment change</p> <p>Table 5A.1 Indicative sub-regional population, households and employment growth 2006 – 2026</p> <p>Table 6A.1 Indicative average</p>	<p>The net growth in jobs in London 2006-2026 is projected as 847,000.</p> <p>A major driver for jobs growth is people-oriented services. Between 1983 and 2003 these industries created 190,000 jobs in London. Projections indicate that there services will create an additional 333,000 jobs between 2006 and 2026.</p>	<p>Qualified support. The proposed foundation of economic growth is uneven. Tables 5A.1 and 6A.1 forecast job growth in the proposed sub-regions. In the case of North London this masks wide borough variations in overall job growth, office based job growth and demand for office floorspace. 80.6% of the net job growth in the North London sub region will be in the boroughs of Westminster, Camden and Islington.</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<p>annual phasing of growth in jobs and homes.</p>		<p>The new employment forecasts 'Borough employment projections to 2026: Working Paper 18 (GLA Economics October 2006)' improve Haringey's employment prospects.</p> <p>Jobs in Haringey are projected to increase by 13,000 between 2006 and 2026 (a 17.1% net growth). This represents an increase from the 'static' job forecast for 2006-2016. The difference is attributed to a change in methodology with the use of a 'triangulation' method.</p> <p>The employment future of Haringey is a key policy issue. The employment forecasts and implications require further scrutiny and discussion, particularly with sub-regional partners. Further work is underway to address the interrelationships between employment growth, housing growth and transport infrastructure and the implications for employment areas, town centres and Opportunity Areas.</p> <p>Table 6A.1 phases the growth of jobs into three phases. Whilst the longer term prospects (2017-2026) for North London have improved this does raise concerns whether new transport infrastructure will be in place to support the job growth.</p> <p>The Council welcomes the recognition of the job opportunities that are generated by housing growth. As paragraph 2.20ii states it is estimated that, on average, for every extra 1,000 new residents, 230 new local jobs are created, with particular potential</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>for growth in the retail and leisure sectors as well as local business services. It is also noted that the environmental goods and services sector is forecast to double by 2010.</p> <p>A key will be to understand the spatial and land use implications of the employment projections in outer London and to match the job growth to the local labour supply. As such the Council supports the alteration to Policy 3B.6 which will keep under review the spatial implications of the emergence of new sectors of strategic importance and the promotion of innovation and knowledge transfer.</p>
<b>CHAPTER 2 THE BROAD DEVELOPMENT STRATEGY</b>		
Policy 2A.1 Sustainability criteria	Altered policy emphasising the impact of development on London's natural resources, environmental and cultural assets and the health of local people and upon the objective to adapting to and mitigating the effect of climate change.	Support.
Policy 2A.1i The spatial strategy for development	<p>New overarching spatial policy which refers to other policies of the plan.</p> <ul style="list-style-type: none"> <li>• Improving London's accessibility through the co-ordination of transport and development with an emphasis on improvement to public transport and reducing traffic congestion (Chapter 3C).</li> </ul>	<p>Qualified support. The new policy setting out a more comprehensive spatial strategy is welcomed. However, there are issues relating to its implementation.</p> <p>In responding to the draft North London Sub-Regional Development Framework (SRDF), the Council requested that the final SRDF should provide more detail on proposals for essential social, transport and utility infrastructure and the relationship between housing growth and that infrastructure requirements should be fully addressed in the London Plan review. The new</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>spatial strategy policy does not fully address the impact of growth on infrastructure and the relationship between the level and pace of development and infrastructure needs and capacity. The altered Plan states that, as a broad rule, there is sufficient land to accommodate projected growth. However, there is no analysis to support this assumption.</p> <p>The further alterations include an updated table (Table 6A.1) showing indicative phasing of growth in jobs and homes by sub-region up to 2026 and a new table (Table 6A.2) showing indicative phasing of public transport capacity increases by sub-region up to and beyond 2022. Unfortunately there is little analysis of the relationship between the two tables. The preparation of the further alterations has been informed by a parallel scenario development and policy testing exercise. The scenario testing exercise has not fully addressed the impacts of growth on social, transport or utility infrastructure.</p>
Policy 2A.1ii London's Sub Regions	<p>New policy proposing a new sub regional structure (see Chapter 5)</p> <p>Revised Sub Regional Development Frameworks will seek to integrate a broad range of strategic implementation issues.</p>	See response to Chapter 5.
Policy 2A.1iii The Central Activities Zone	New policy which strengthens the strategic role of the Central Activities Zone (CAZ) and proposes a planning framework for the CAZ.	Support
Policy 2A.2 Opportunity Areas	Altered policy to focus on good design, including public realm, open space and where appropriate	Support. There is no mention in Policy 2A.2 of measures to mitigate and adapt to climate change

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
Policy 2A.5 Town Centres	<p>tall buildings.</p> <p>Altered policy to enhancing and diversify the role of town centres and consolidate their strengths.</p>	<p>and reference is delegated to paragraph 2.8</p> <p>Qualified support. The Council welcomes the alteration to Policy 2A.5 for DPDs to promote town centre sites for retail development, but this could extend to all town centre uses and health uses. This is acknowledged in Policy 3D.2.</p> <p>The third bullet 'reducing delivery, servicing and road use conflict' would benefit from clarification.</p>
Policy 2A.6 The suburbs: supporting sustainable communities	<p>A new policy which promotes local economies, focuses development in town centres at higher densities, improves local services and facilities, maintains and improves the features of London's suburbs, such as open space and encourages a low carbon emission approach across London's suburbs.</p>	<p>Qualified support. The detailed policy on London's suburbs is supported. However, crucial to its implementation is the interrelationship between housing and population growth and employment growth in outer London. The main conclusion from the housing targets and employment forecasts is that Haringey will not be able provide sufficient employment opportunities for its growing population and will have to increasingly rely on other parts of London and beyond to provide job opportunities for its residents. This is likely to increase levels of commuting on a transport network which is already overcrowded and congested.</p> <p>Paragraph 2.18i does recognise that London's suburbs are hugely varied in character and have different priorities and issues. As such the new policy provides the framework for further work and discussion on policy issues which affect Haringey.</p> <p>Notwithstanding paragraph 2.22, it would be helpful if the further alterations defined precisely what is meant by the term 'suburbs' and how this relates to the suburban setting in Table 3A.2 Density Matrix.</p>



Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>The 2<sup>nd</sup> bullet should be split into two bullet points.</p> <p>Although the 5<sup>th</sup> bullet point is unaltered, the issue of intensification of land around town centres raises concerns regarding the relationship between linear town centres and adjoining lower density residential areas.</p> <p>The policy should include references to quality design and crime, safety and security.</p>
Paragraph 2.23ii	Reference is made in to the Mayor's new Regional Housing Strategy	The Greater London Authority Bill requires the Mayor to publish a London Housing Strategy, including a statement of housing investment priorities setting out in outline the amount, type and location of new affordable housing. Local housing strategies should be in general conformity with the Mayor's strategy and the Housing Corporation will be required to have regard to the strategy in carrying out its functions.
Policy 2A.7 Strategic Industrial Locations	Altered policy to rename Strategic Employment Locations as Strategic Industrial Locations and prepare frameworks to manage London's stock of industrial land.	See response to Policy 3B.5
<b>CHAPTER 3 LIVING IN LONDON</b>		
Paragraph 3.8	This Plan assumes that the existing backlog in housing need should be met over a ten year period. The GLA Housing Requirements Study estimated that the net housing requirement arising from household population change and historic unmet need was 353,500 homes over 10 years or 35,400 additional homes a year.	Housing and population growth across London needs to be supported by investment in social infrastructure. There needs to be a proper mechanism in place to ensure the phasing of such investment. Both the early and further alterations recognise this. However there is no detail on how the Mayor proposes to support the coordination of

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		the delivery of the required infrastructure.
<p>Policy 3A.2i Maximising the potential of sites</p> <p>Table 3A.2</p>	<p>Altered policy stating that boroughs should develop residential and commercial density policies and adopt the residential density ranges set out in Table 3A.2 and which are compatible with sustainable residential quality.</p> <p>Revised Density Matrix table to give density ranges (by units per hectare) for different average dwelling sizes.</p>	<p>Support. Haringey's adopted UDP refers to the London Plan density ranges. The altered Table 3A.2 relates dwelling mix to density and should encourage a better mix of dwelling unit sizes including larger units. The Council questions whether in practice there will be Suburban locations with PTALs 4-6 or Central locations with PTALs 0-1. The Council would welcome guidance on how to apply the matrix.</p>
Paragraph 3.15v	Alteration to definitions of location setting used in the matrix to take account of accessibility to town centres.	<p>Support. The location setting definitions take account of walking distance to a town centre. This clearly identifies that parts of Haringey are suburban in character (ie. beyond 10 minutes walking distance of a district centre or main arterial route). However, more work needs to be done to define suburban character. The Council notes that paragraph 2.18i states that suburbs are hugely varied in character. For example, the definition of suburban could include relatively low density terraced housing.</p>
Paragraph 3.15vi	New paragraph explaining how the density of schemes can be at the higher or lower end of the appropriate density range depending on public transport connectivity and capacity.	Support
Paragraph 3.16	Paragraph updated to reflect the 2004 London Housing Capacity Study. It is estimated that about 13,500 dwellings could be brought back into use between 2007/8 and 2016/17. This target of 1,350 a year is incorporated in the new housing provision targets set out in table 3A.1 above.	The new empty property figure for Haringey is supported.
Policy 3A.4 Housing Choice	Deletion of students, older people, families with children and people willing to share	A new key policy objective to ensure that housing mix policies meet the needs of larger households

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	accommodation.	<p>has not been taken forward in policy.</p> <p>The Council notes the publication of the London Assembly report 'Size Matters: The need for more family homes in London' (June 2006). The report found that there were three issues that hamper boroughs and RSLs in building larger homes – funding, suitability and the method used to calculate the amount of affordable housing per development. The Mayor's SPG on housing addresses the latter point where the proportion of affordable housing could be calculated in terms of habitable rooms or floorspace. There is clearly a tension between achieving housing targets at higher densities and the provision of family housing. Family sized housing has more specific requirements than smaller units because of the presence of children.</p> <p>The Council notes the publication of draft SPG on Providing for Children and Young People's Play and Informal Recreation (October 2006). The draft SPG notes the issue of density of development and provision of adequate on-site play provision. The issue of funding is crucial to the provision of affordable family housing and it is noted that the proposed power for the Mayor to allocate the affordable housing part of the Regional Housing Pot should assist. The Housing Corporation has addressed this issue by assessing applications and distributing grants on a per person and per unit basis, thus increasing funding for larger homes.</p>
New Policy 3A.4i Quality of new	New policy which refers to the design and	Support new policy and the shift in emphasis from

<b>Reference (Policy / paragraph)</b>	<b>Summary of draft alteration</b>	<b>Council's response</b>
housing provision	construction policies in Chapter 4A, the density requirements in Policy 3A.2A and the provision of play and informal recreation provision for children and young people.	unit volume of housing supply to quality of new housing provision. However, the policy should given an explicit statement on the importance of good quality design.
Policy 3A.5 Large Residential Developments	Requirement for boroughs to prepare planning frameworks for all large residential sites of 5 hectares or more, or that are capable of accommodating more than 200 dwellings.	Support. However, the requirement to provide planning frameworks for all large residential schemes (200 units on over 5 hectares) goes beyond the recommendation in the Panel Report on the Early Alterations (Recommendation H5) which refers to strategic applications of 500 units or 10 hectares.
Paragraph 3.25i	New paragraph refers to large residential developments offering economies of scale to achieve particularly high environmental standards and very low carbon emissions. The scale of development is likely to make decentralised energy feasible.	Support.
Paragraph 3.29	Paragraph now states that many key workers will not be able to afford market housing, and some will not be able to afford intermediate housing either and will therefore require social housing.	Support. There have been examples of poor take up of intermediate schemes in Haringey which reflects the affordability of such accommodation and the specific requirements of some key workers. Setting sub targets for different priority groups is appropriate and helpful.
Paragraph 3.33	Within the new housing figure for London (35,400) the need for affordable housing is estimated at 23,000 a year.	Note the high level of affordable housing need. In Haringey affordable housing need exceeds housing capacity in the borough and as such the Council must prioritise towards those in greatest need.
Policy 3A.7 Affordable Housing Targets	Altered policy to reflect different sources of affordable housing supply including affordable housing schemes funded independently of planning contributions from private development.	Support.
Paragraph 3.44i	Altered paragraph to add an exception for off-site provision of affordable housing where more units	Support. Helpful sentences to increase the overall provision of affordable housing and create more

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	are created than through on-site provision. Generally off-site provision should only be considered where a site is identified and delivery is certain.	socially balanced communities.
New policy 3A.8i Affordable housing thresholds  Paragraph 3.46i	New policy to require affordable housing on sites with a capacity to provide 10 or more homes, applying the density guidance in Policy 3A.2i. Boroughs are encouraged to seek a lower threshold through the DPD process where this can be justified in accordance with Government guidance.  Paragraph 3.46i states that capacity should be accessed according to the density matrix (Table 3A.2).	Haringey's adopted UDP contains a 10 unit threshold for affordable housing. The policy is supported and reference to site capacity is helpful to prevent developers circumventing the threshold. Haringey will consider a lower threshold through the LDF process: an approach which is endorsed in the final version of PPS3.
Paragraph 3.54i	New paragraph stating that boroughs should undertake assessments of the need for care homes for older people, children and other client groups requiring care home provision rather than supported accommodation.	Support.
New paragraphs 3.56i & 3.56ii  New Table 3A.3 DCLG Caravan Count	New paragraphs stating that identified gypsy and traveller sites should be appropriate for residential occupation and have access to social facilities. A comprehensive London wide study of gypsy and traveller accommodation needs has been commissioned by the Mayor in partnership with London boroughs. This will be completed by June 2007 and will form the evidence base for borough targets. In the interim, Table 3A.3 sets out information by borough from the most recent DCLG caravan count, in relation to authorised provision and unauthorised provision.	Support. However, the inclusion of Table 3A.3 setting out the DCLG caravan count does not address need.

<b>Reference (Policy / paragraph)</b>	<b>Summary of draft alteration</b>	<b>Council's response</b>
Policy 3A.14 Addressing the needs of London's diverse population	New sentence added to refer to healthcare, community engagement, and the provision of suitable space for Small and Medium-sized Enterprises.	Support.
New paragraphs 3.62i and 3.62ii	New paragraphs referring to how the Mayor will tackle discrimination, exclusion and health inequalities between different communities.	Support.
Paragraph 3.67ii	New paragraph referring to SPG on the use of benchmark standards for children's play and informal recreation in the preparation of play strategies and the provision of suitable facilities.	Support.
Paragraph 3.76	New sentence stating that policies throughout the London Plan will improve community safety and reduce crime. New paragraph also states that there may be a need for additional prison accommodation within London in the future.	Support. It is assumed that additional prison accommodation will be addressed on a sub-regional basis.
Policy 3A.15 Protection and enhancement of social infrastructure and community facilities	Alterations added to policy referring to the provision of social infrastructure and community facilities to meet increased population and to meet existing deficiencies.	Support the alterations to Policy 3A.15 which assist Haringey negotiate planning obligations for the provision of social infrastructure. However, the policy should recognise that for infrastructure that requires revenue expenditure, ie health facilities, a s106 contribution is seen as interim funding before permanent revenue funding is secured.
Policy 3A.16 The voluntary and community sector	Sentence added referring to Statement of Community Involvement.	Support.
Paragraph 3.82	Sentence added to referring to expansion of new models of NHS care.	Support.
Policy 3A.18 Locations for health care	Policies in DPDs should support the provision of additional healthcare within the borough as identified by the strategic health authorities and primary care trusts.	There is a concern that future health needs from population and housing growth have not be addressed as part of the London Plan review. The Council has already expressed its concern in response to the draft North London SRDF that

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		there may not be sufficient land to cater for a necessary increase in the number of health care services in the borough and such services will have to compete with other land uses, such as housing and employment uses.
Policy 3A.19 Medical excellence	Policy updated to refer to the protection of existing health facilities and the promotion of new ones.	Support.
Policy 3A.20 Health impacts	Policy altered to require Health Impact Assessments for major applications.	Support.
Policy 3A.21 Education facilities	<p>Altered policy and paragraphs referring to the need for new education facilities specifically in Areas for Regeneration and to maximising the usage of schools in the evening and at weekends to reduce the need for more alternative land.</p> <p>A sub-regional analysis of demands up to 2016 will be provided in the SRDFs.</p>	Support. It is noted that the revised SRDFs will address future educational needs.
Policy 3A.23 Community strategies	Altered policy refers to additional issues that DPDs should address to integrate community strategies into the development process: - business support, employment training and promoting social inclusion; access to social infrastructure and community facilities; climate change; addressing environmental inequalities; and enhancing safety and security.	Support.
<b>CHAPTER 3B: WORKING IN LONDON</b>		
<p>Paragraphs 3.114 - 3.120 Demand and supply of office accommodation</p> <p>Table 3B.1 Demand for office based jobs and floorspace 2006-</p>	<p>The net overall job growth is forecast to increase by 847,000 jobs between 2006 to 2026. The financial and business services sector is projected to grow by 510,000 jobs.</p> <p>There is still pressure for further growth in the</p>	Table 3B.1 forecasts office based jobs by the proposed sub-regions. In the case of North London this masks wide borough variations in office based employment growth and consequently demand for office floorspace.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
2026	Central Activities Zone. There will continue to be some demand for office based activities elsewhere in London, but to a lesser extent than anticipated in the original London Plan.	<p>Table 3B.1 allocates the 510,000 growth in financial and business services projected for 2006-2026 as a proxy for net office demand. 32% of the growth will be in the north London sub region which translates into a demand for 2.45 million sq.m. of office floorspace. Table 11 of the London Office Policy Review 2006 projects a 6,000 job growth for Haringey in financial and business services from 2006-2026 which translates into a demand for 96,500 sq.m. of office floorspace (Table 14). The stock of office floorspace has decreased in Haringey by 8,000 sq.m. between 2001 and 2005 (Table 19) and there is no office development in the pipeline (Table 17).</p> <p>The report notes that in certain locations, especially the outer North and outer North East boroughs, developers have "given up" on offices, favouring instead either residential or mixed use/retail led renewal schemes. Given the lack of office development in the pipeline and the unattractiveness of the second-hand office market and existing town centre based locations, it is unclear where this demand is to be satisfied.</p>
<p>Policy 3B.2 Office Demand and Supply</p> <p>Paragraph 3.123</p>	<p>Altered policy to enhance the environment and offer of London's office locations and develop strategies to manage long term structural change in the office market beyond the CAZ, focusing on phased consolidation in strategically specified locations.</p> <p>The low rents achieved in parts of the suburban second-hand market also provide little incentive for</p>	<p>Support. The altered policy refers to strategically specified office locations outside central London, without defining where they are. In particular, it is unclear whether Opportunity Areas or Wood Green Metropolitan Centre would fit into this category. The London Office Policy Review concludes that there is no point promoting office development in untried locations.</p>



Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	new investment.	The Council would welcome further research on the outer London office market. It is noted in paragraph 3.124 that SRDFs will provide more local guidance on this matter.
Policy 3B.4 Mixed Use Development	Altered policy referring to strategically specified locations where mixed use development should include office provision.	Support. The altered policy refers to strategically specified office locations outside central London, without defining where they are.
Paragraph 3.124ii	The Mayor will closely monitor implementation of mixed use policy to ensure it meets broader strategic objectives and may provide supplementary planning guidance on implementation of this policy.	Support. The Mayor is encouraged to provide Supplementary Planning Guidance on the implementation of the mixed use development policy.
Policy 3B.5 Strategic Industrial Locations	<p>The Mayor will promote, manage and where necessary protect the varied industrial offer of the Strategic Industrial Locations (SILs), set out in Annex 2 as London's strategic reservoir of industrial capacity. Boroughs should develop policies and criteria to manage Locally Significant and other smaller industrial sites.</p> <p>One criteria is the need for strategic and local provision for waste management, transport facilities, logistics and wholesale markets within London and the wide city region.</p>	It is disappointing that the Strategic Employment Locations were not reviewed as part of the alterations to the London Plan. This is needed in response to early alterations on housing supply and waste planning which refer to surplus employment land as a source of additional housing and for waste management facilities. The designation of Strategic Employment Locations is inconsistent with the designation of Tottenham Hale as an Opportunity Area and Haringey Heartlands as an Area for Intensification as it does not reflect residential led mixed use regeneration in these areas. Also other locally significant industrial sites may benefit from strategic protection.
Paragraph 3.127i	Additional paragraph requiring that surplus industrial land should be used for appropriately located other activities. The choice of land for release should take account of relative environmental quality so that new uses do not compromise nearby industrial operations and vice versa.	Support

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
Policy 3B.6 Supporting innovation	Working with strategic partners, the spatial implications of the emergence of new sectors of strategic importance and the promotion of innovation and knowledge transfer will be kept under review.	Support. See response to paragraphs 1.42 – 1.46 'Future economic and employment change'.
Policy 3B.8 Promotion of e-London	Support for the LDA's e-Business Strategy which will coordinate pan London e-initiatives.	Support
Policy 3B.10 Tourism industry	Development of the tourism strategy to identify and encourage sustainable tourism provision and maximise opportunities arising from the Olympic and Paralympic games.	Support
Policy 3B.11 Environmental industries	Support for Green Industries: the Mayor's commitment to managing 85 per cent of London's waste within its boundaries using sustainable processes including re-cycling and to mitigating and abating the effects of climate change, for example through support for CCHP and renewable fuels (see Chapter 4A) will provide a major impetus to this sector.	Support. The North London Joint Waste DPD will consider options for managing all the types of waste that will be generated across the seven North London boroughs and will identify and safeguard sites for managing and recycling that waste using a mix of different technologies.
Policy 3B.12 Improving employment opportunities for Londoners	<p>Altered policy on improving employment opportunities for Londoners with emphasis on access to affordable and accessible childcare and on improving skills.</p> <p>Reference to increasing the productivity of London's businesses by tailoring supply side skills to employer led demand through the Regional Skills Partnership, the London Skills Commission and Sub Regional Economic Development Implementation Plans.</p>	Support

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<b>CHAPTER 3C CONNECTING LONDON</b>		
Policy 3C.1 Integrating transport and development	Altered policy to emphasise walking and cycling and encouraging integration of major transport infrastructure with improvements to public realm. The cumulative impacts of development on transport requirements should be taken into account.	Support.
Policy 3C.2 Matching development to transport capacity	Altered policy to encourage boroughs to explore development in areas where there is appropriate transport accessibility and capacity and to facilitate opportunities to integrate major transport proposals with development.	The increased emphasis on integrating transport capacity with spatial development is supported. Reference is made to 'appropriate phasing' until known capacity requirements can be met. This will give borough LDDs will place a critical role in relating key development opportunities to 'appropriate' levels of transport accessibility and capacity, and to integrating development around improving interchanges.
Policy 3C.3 Sustainable transport in London	Altered policy to encourage shifts to more sustainable modes and appropriate demand management and measures that promote use of low carbon technologies.	Support.
Paragraph 3.163	The Mayor supports the use of car clubs and car free or virtually car free development where appropriate, taking account the need for disabled parking.	Support.
Paragraph 3.168i	In exceptional cases, opportunities should also be taken for releasing transport land which will not be required for transport purposes.	Support.
Paragraph 3.169	To meet growing demand for longer distance business related travel improvements should be made through the Lee Valley to Stansted Airport, including increasing capacity to Stansted.	Encouraging longer-distance commuter train services should not be at the expense of local services.
Policy 3C.9 Increasing the	The target for a 50% increase in public transport	The identified transport schemes in Haringey are

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<p>capacity, quality and integration of public transport to meet London's needs</p> <p>Paragraph 3.181i</p> <p>Table 3C.1 Indicative phasing and status of major transport schemes</p> <p>Table 6A.2 Phasing of public transport capacity increases</p>	<p>capacity is rolled forward to 2026.</p> <p>The proposed transport schemes are described in Table 3C.1 the estimated capacity of these schemes is phased in Table 6A.2</p>	<p>supported. Enhancements to the capacity of the West Anglia rail corridor is a key requirement to unlock the growth potential in the Upper Lee Valley and the London-Stansted-Cambridge-Peterborough growth area, in particular the development at Tottenham Hale. However, completion of longer term enhancements to the West Anglia Railway are phased post 2022 and this presents a risk to the regeneration of the Opportunity Area, the growth area and Tottenham Hale.</p> <p>The Transport for London Investment Programme 2005/6 to 2009/10 makes no commitment to schemes post 2010 so the extent and pace of transport capacity enhancements is unclear, as is ability to meet the 50% increase in public transport capacity by 2026.</p>
<p>Policy 3C.9i Public transport security</p>	<p>New policy on improved public transport security and safety measures.</p>	<p>Support.</p>
<p>Paragraph 3.182i</p>	<p>New paragraph referring to the requirement for major transport improvements to support the London 2012 Olympics and Paralympics and regeneration of the Lower Lea Valley.</p>	<p>The further alterations should fully recognise the importance of direct rail linkage along the Lee Valley line between Tottenham Hale and Stratford and direct services from Seven Sisters to Stratford to support sustainable access to Stratford and the Olympics site and for the Olympics legacy.</p>
<p>Paragraph 3.183i</p>	<p>New paragraph stating that investments in bus services, and in cycling and walking facilities will be a key part of improving accessibility in both inner and outer London.</p>	<p>Support. Further improvements could improve east-west movement in Haringey.</p>
<p>Policy 3C.11 New cross-London links within an enhanced London National Rail network</p>	<p>Altered policy to refer to the creation of an orbital railway by linking and enhancing the East, West and North London lines, including electrification of the Gospel Oak to Barking line (Orbirail)</p>	<p>Support</p>

<b>Reference (Policy / paragraph)</b>	<b>Summary of draft alteration</b>	<b>Council's response</b>
Policy 3C.12 Improved Underground and DLR services	Altered policy referring to specific upgrades of Underground lines, including the Victoria and Piccadilly Line upgrades by 2013/2014.	Support
Policy 3C.13 Enhanced bus priority, tram and busway transit schemes	Altered policy to improve journey times through the implementation of priority schemes to assist buses and new tram and busway transit schemes.	Support
Paragraph 3.197	Recognition that local road improvements will sometimes be required, particularly in areas of substantial regeneration or development activity.	Support. Reference should also be made to the need to manage the capacity of highway networks in the light of the housing growth. Worsening congestion is a particular worry especially in the North Circular corridor.
Policy 3C.20 Improving conditions for walking	Altered policy to ensure DPD policies provide for audits of existing pedestrian infrastructure, plan for suitable crossing facilities around and near new developments and plan for improving the safety and security of the pedestrian environment.	Support
Paragraph 3.218	Altered paragraph identifies the need for a number of small rail freight facilities within the urban area.	The Council notes that the Land for Transport SPG does not deal with specific sites and TfL has decided that further planning guidance is needed.
<b>CHAPTER 3D ENJOYING LONDON</b>		
Policy 3D.1 Supporting Town Centres	Altered policy to encourage forms of development which reduce carbon dioxide emissions, enhance the competitiveness and quality of centres, develop a sense of place and identity for sustainable communities, encourage net additions to town centre capacity role and undertake regular integrated strategic and local consumer need and capacity assessments.	Support. It is noted that a recent report on London Retailing (GLA Economics, October 2006) identifies trends which are significant for the retail function of town centres. It would be helpful if the Mayor sets out how he intends to alter operational practice and consumer behaviour (2nd bullet) and the competitiveness of town centres (4 <sup>th</sup> bullet).
Paragraph 3.226	Altered paragraph which recognises and supports various types of specialisation in the London town centre network.	Support the recognition of specialisation which is important for Haringey's District Centres which reflect the social and ethnic composition of the surrounding area. The Council assumes that the

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		coordination of strategically functional specialisations will be addressed through the sub regional development frameworks.
3D.2 Town Centre Development	<p>Altered policy requiring DPD policies to assess the need and capacity for additional retail, leisure, commercial and other town centre development in an integrated manner.</p> <p>New 3<sup>rd</sup> bullet to encourage additional comparison goods capacity in larger town centres and convenience capacity in smaller centres of an appropriate scale in order to encourage a sustainable pattern of retail provision.</p> <p>New 5<sup>th</sup> bullet to manage existing out or edge of centre retail and other service provision in line with the sequential approach seeking to reduce car dependency and traffic generation and to improve public transport access to promote more sustainable forms of development. Paragraph 3.230i refers to Brent Cross as falling into this category.</p>	Support. The role of outer London town and local centres is crucial to the future sustainability of London's suburbs. The emphasis on enhancing town and local centres is welcomed. The Mayor is urged to undertake further work on London's strategic town centre network, the role of local shopping centres in outer London and the benefits of diversifying 'out of centre' locations and improving their public transport accessibility.
Policy 3D.3 Maintaining and Improving Retail Facilities	Altered policy to prevent the loss of street and farmers' markets.	Support.
Paragraph 3.236 New Map 3D.2	Altered paragraph and new map identifying the strategic clusters of night time activities in and around central London and in some town centres.	Support identification of strategic clusters of night time activity (Map 3D.2 and Table A1.1) including Wood Green, Muswell Hill, Crouch End and Green Lanes Town Centres as having specialized provision of more than local importance. The best practice guidance on the night time economy is welcomed.
New Policy 3D.4i Casinos	New policy to ensure that the development of 'small' and 'large' casinos take account of the wider	Support

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	<p>policies of this plan including those for the location of leisure facilities. The Government has announced that for an initial period only there will be only one "Regional", eight "large" and eight "small" casinos. It names Wembley and Greenwich peninsula as appropriate locations for 'Regional' casinos. The Government may decide to permit a greater number of casinos or lift restrictions on their number altogether over the life of the London Plan. Casinos may form part of larger leisure complexes. They should be located in highly accessible areas with scope for sharing car parking provision being maximised.</p>	
<p>Policy 3D.5 The Olympic and Paralympics Games and Sports facilities.</p>	<p>Altered policy to develop and implement legacies from the new permanent facilities in the Olympic Park which are affordable and accessible for all Londoners.</p>	<p>Support.</p>
<p>Policy 3D.6 Visitors accommodation and facilities.  Paragraph 3.243i</p>	<p>Altered policy with a new hotel bedroom target off 50,000 gross rooms by 2026, an emphasis on the quality and variety of hotel accommodation and the need to bring forward a major international convention centre.</p> <p>Sub regional tourism strategies and development frameworks will provide guidance on more local implementation</p>	<p>Support. The GLA Hotel Demand Study (June 2006) estimates the need for 250 net additional hotel bedrooms in Haringey by 2026. The impact of the London 2012 Olympic and Paralympic Games which create demand for visitor and business tourism and conference facilities. It is expected that the geographical spread of hotels is expected to increase linked to redevelopment around transport hubs, which should be addressed in relation to Opportunity Areas. Direct rail linkage between Tottenham Hale and Stratford is therefore important.</p>
<p>Policy 3D.7 Realising the Value of Open Space</p>	<p>Altered policy to treat open space as an integrated system that provides a "green network" containing many uses and performing a wide range of functions. All developments will be expected to</p>	<p>Support.</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	incorporate appropriate elements of open space that make a positive contribution to the wider network..	
Policy 3D.8 Green Belt	The Mayor will and the boroughs should encourage positive uses for green belt that realise the potential to improve the quality and accessibility of the land while meeting its statutory purpose.	Support so long as there is no conflict between "positive" uses and the national policy presumption against inappropriate development.
Policy 3D.10 Open space provision in DPDs	DPD polices should identify and support Regional and Metropolitan Park opportunities	Support.
Policy 3D.11 Open Space Strategies	Wildlife sites have been added to the areas that boroughs should take audits of.	Support.
New Policy 3D11 Children and Young People's Play and informal recreation strategies.	New policy to ensure that all children have safe access to good quality, well designed, secure and stimulating play and informal recreation provision. Boroughs should produce play and informal recreation strategies to improve access and opportunity for all children. Audits of exiting play spaces must be undertaken as well as assessment of need. Developments that include housing must make provision for play and informal recreation based on the expected child population generated by the scheme and an assessment of future needs.	Support. The Council notes the publication of draft SPG on Providing for Children and Young People's Play and Informal Recreation (October 2006). The draft SPG notes the issue of density of development and provision of adequate on-site play provision. Family sized housing has more specific requirements than smaller units because of the presence of children and there are policy tensions between achieving housing targets at higher densities and the provision of family housing.
Policy 3D.12 Biodiversity and Nature Conservation	DPDs should identify deficiency areas and the opportunities for addressing them. Where development might affect important species, the approach should seek to avoid adverse impact.	Support.
Map 3D.4 Sites of Metropolitan Importance for nature conservation and areas of deficiency in access to nature in London	Protection of biodiversity outside strategic areas will also be necessary, and targets have been identified in table 3D.2 for the re-creation and restoration of priority habitats as advocated by PPS9. The Mayor expects that biodiversity and natural heritage of London is to be enhanced and conserved for the benefit of this and future	Support.



Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	generation, and has produced advice on DPD policies for biodiversity to assist the boroughs in doing this.	
(New) Policy 3D.12i Trees and Woodland	All trees and woodland should be maintained, protected and enhanced in support of the London Tree and Woodland Framework. Ancient woodland should be provided with strong protection.	Support.
(New) Policy 3D.12ii Geological Conservation	Boroughs should accord the highest protection to nationally protected sites (SSSIs), give strong protection in their DPDs to Regionally Important Geological Sites, and identify additional sites which are of value at a local level and accord them a level of protection commensurate with their local significance. Where development would affect an identified geological site, the approach should be to seek to avoid adverse impact on the geological interest or to minimise such impact and seek mitigation of any residual impacts. The Mayor will prepare a methodology that will enable boroughs to identify Locally Important Geological Sites (LIGS).	Support
Policy 3D.13 London's countryside and the urban fringe	Altered policy to ensure that DPD policies support regional and cross-boundary urban fringe management.	Support.
<b>4A CLIMATE CHANGE AND LONDON'S METABOLISM</b>		
Paragraphs 4.1ii – 4.1vi	New paragraphs introducing the issue of climate change and the implications for London. Outlines the Mayors commitment to raising awareness and promoting behavioural change in support of mitigation and adaptation. The Mayor will use all of his powers, resources and influence to work with other agencies to raise awareness and promote behavioural change. The London Plan can strongly	Support.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	influence the way in which new development responds to the need for mitigation and adaptation. Dealing with climate change is an integral and essential part of the development process and not a set of "add ons".	
Paragraph 4.1	Change to the definition of the proximity principle as follows: the 'proximity principle' – which states that waste should be disposed of at the nearest appropriate installation.	Support in principle although it could be beneficial to align it better with the definition in the glossary.
Policy 4A.15 Tackling climate change	Policy on climate change rewritten. The Mayor will and boroughs should in their DPDs require developments to make the fullest contribution to the mitigation of and adaptation to climate change.	Support
New Policy 4A.2ii Mitigating climate change Paragraphs 4.13i – 4.14i	<p>The Mayor will work towards the long-term reduction of carbon dioxide emissions by 60 % by 2050. The Mayor will and boroughs and other agencies should seek to achieve the following minimum reduction targets for London against a 1990 base; these will be monitored and kept under review:</p> <ul style="list-style-type: none"> <li>• 15% by 2010</li> <li>• 20% by 2015</li> <li>• 25% by 2020</li> <li>• 30% by 2025</li> </ul> <p>The targets are feasible with the full commitment and collaboration of all stakeholders, including the Government.</p>	<p>Support. The Council is exploring local targets and carbon reduction scenarios and through this process will identify levels of intervention necessary to achieve these targets at a borough level.</p> <p>It should be fully recognised that these targets are also dependent on measures other than planning policy such as changing behaviour and lifestyles and 'retro-fitting' existing buildings.</p> <p>The Council welcomes the staggered targets and the commitment to monitor and review these targets. It would welcome further research on the contribution of new development in reducing overall carbon dioxide emissions.</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
Policy 4A.2i Sustainable design and construction	<p>Existing policy amended to increase the measures to be considered in order to ensure sustainable design and construction (SDC).</p> <p>The Mayor will and the boroughs should require all applications for major developments to include a statement on the potential implications of the development on sustainable design and construction.</p>	<p>Support. Haringey's UDP contains a policy on sustainable design and construction. Experience from boroughs which already have similar policies indicates that successful implementation of such policies at borough level requires additional skills and resources which may go beyond traditional planning skills.</p> <p>It may also require new ways of working for instance bringing other staff such as energy managers or building control officers to work together with planners to assess sustainability statements.</p> <p>Regarding monitoring of implementation, the Mayor should identify measures to support borough planners to ensure that design features identified in sustainability statements are actually implemented during construction stage.</p> <p>A London-wide network of expertise which offers free support to planners should be explored.</p>
Paragraph 4.4ii	<p>New paragraph on the Mayor's SPG on SDC and the Demolition Protocol developed by London Remade to support recycling and reuse of materials.</p>	<p>Support.</p>
Paragraph 4.52	<p>New sentences relating to living roofs.</p>	<p>Support.</p>
Policy 4A.8 Energy assessment	<p>Additions to the supporting text of this policy regarding the requirement for an assessment of the energy demand for major developments and what these should include.</p>	<p>Support. As with the sustainability statements above, successful implementation of such policies at borough level requires additional skills and resources which may go beyond traditional planning skills. It also requires pulling together skills available elsewhere such as energy</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>managers and building control officers working alongside planners to assess energy statements. A London-wide support network should be encouraged.</p> <p>Regarding monitoring of implementation, Mayor should identify measures to support borough planners to ensure that design features identified in sustainability statements are actually implemented during construction stage.</p>
<p>New Policy 4A.5i Decentralised Energy: Heating, Cooling and Power</p>	<p>The Mayor will and boroughs should in their DPDs require all developments to demonstrate that their heating, cooling and power systems have been selected to minimise CO<sub>2</sub> emissions.</p> <p>Developments should evaluate combined cooling, heat, and power (CCHP) and combined heat and power (CHP) systems and where a new CCHP/CHP system is installed as part of a new development, examine opportunities to extend the scheme beyond the site boundary to adjacent areas.</p> <p>The Mayor will expect all major developments to demonstrate that the proposed heating and cooling systems have been selected in accordance with the following order of preference:</p> <ul style="list-style-type: none"> <li>• connection to existing CCHP/CHP distribution networks;</li> <li>• site-wide CCHP/CHP powered by renewable energy;</li> <li>• gas-fired CCHP/CHP or hydrogen fuel cells,</li> </ul>	<p>Support. Successful implementation of such policies at borough level requires additional skills and resources which may go beyond traditional planning skills. It also requires pulling together skills available elsewhere such as energy managers and building control officers working alongside planners to assess energy statements. A London-wide support network should be encouraged.</p> <p>Regarding monitoring of implementation, Mayor should identify measures to support borough planners to ensure that design features identified in sustainability statements are actually implemented during construction stage.</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	<p>both accompanied by renewables;</p> <ul style="list-style-type: none"> <li>• communal heating and cooling powered by renewable energy;</li> <li>• gas fired communal heating and cooling.</li> </ul>	
Paragraphs 4.23i and 4.23ii	<p>New paragraphs encouraging combined cooling, heat, and power (CCHP) and combined heat and power (CHP) systems. Where possible, the opportunity to link a new development to an existing CCHP/CHP system may be the most resource efficient option, allowing more effective use to be made of heat, power and cooling. If it is not possible to link to an existing system, the provision of CCHP/CHP needs to be considered on a site-wide basis that connects different uses and/or group of buildings. Electrical heating and cooling systems cause significant carbon emissions and the Mayor wishes to discourage these.</p>	<p>Support. Haringey's emerging masterplans for Tottenham Hale and Haringey Heartlands allow opportunities to be further explored.</p>
<p>Policy 4A.7 Renewable Energy</p> <p>Paragraph 4.21</p>	<p>Altered policy to require developments to achieve a reduction in carbon dioxide emissions of 20% from onsite renewable energy generation.</p> <p>Boroughs in their DPDs should identify broad areas where the development of specific renewable energy technologies are appropriate.</p> <p>Supplementary Planning Guidance on Renewable Energy will set out broad guidelines to define locations where stand-alone renewable energy schemes would be appropriate and set criteria both for the assessment of such schemes and for application to individual technologies.</p>	<p>The increase from 10 % to 20 % is supported but requires further clarification on how this target can be achieved. Haringey's UDP contains a policy requiring 10% on-site renewable energy target, where feasible. The Mayor is encouraged to provide design guidance on how the 20% on site renewable energy target is to be achieved.</p> <p>It is noted that the Mayor recognises the possible cost implications of new proposed targets.</p> <p>The Mayor is reminded of paragraph 8 (i) of PPS22 which requires that policies should ensure that requirement to generate on-site renewable energy</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>is only applied to developments where the installation of renewable energy generation equipment is viable given the type of development proposed, its location, and design.</p> <p>It is noted that consideration is being given to addressing the requirement in PPS22 for the London Plan to include a target for renewable energy capacity for 2010 and 2020.</p> <p>The Mayor is urged to explore opportunities for stand-alone renewable energy schemes in Opportunity Areas.</p>
Paragraphs 4.18i, 4.18ii and 4.18iii	New reference to developments referred to the Mayor, The London Renewable Energy Toolkit and The London Energy Partnership who are developing currently a low carbon design toolkit.	Support good practice.
New Table 4A.1i Targets for installed Renewable Energy capacity (up to 2020)	The new table has targets for 2010 and 2020 for a number of renewable energy installations including wind turbines, CHP and solar PV.	It is noted that these are London-wide targets and borough level capacity may differ.
New Policy 4A.5ii Hydrogen Economy and 4.23iii	A new policy outlining how the Mayor will work with the London Hydrogen Partnership, the London Climate Change Agency, boroughs and others to support and encourage the more widespread use of hydrogen as an alternative to fossil fuels.	Support.
New Policy 4A.5iii Adaptation to Climate Change	<p>The Mayor will and other agencies should promote and support the most effective adaptation to climate change, including:</p> <ul style="list-style-type: none"> <li>• minimising overheating and contribution to heat island effects (policy 4A.5iv)</li> <li>• minimising solar gain in summer (policy 4A.5iv)</li> <li>• contributing to reducing flood risk including</li> </ul>	Support.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	applying principles of sustainable urban drainage (policy 4A.5vii)	
New Policy 4A.5iv Overheating, 4.30i and 4.30ii	The Mayor will, and boroughs should strongly encourage development that avoids internal overheating and excessive heat generation and contributes to the prevention of further overheating, especially where the urban heat island is most intense. Developers should demonstrate how development could be made heat resilient in design, construction and operation. The Mayor will work with partners to reduce the heat island effect through energy efficiency and appropriate design.	Support.
Flood defences and flood risk management 4.30iii and 4.30iv	New paragraphs about reducing flood risk and the requirement for flood risk assessments to be carried out for development in high flood risk areas. As London is prone to flooding, the management of flood risk is critical to London's future.	Support. Currently, the Environment Agency require flood risk assessments for development proposals in high flood risk area. It is noted that draft PPS 25 requires boroughs to produce strategic flood risk assessments.  Map 4A.2 on indicative flood risk areas does not appear to have been included in the further alterations.
Policy 4A.5vii Sustainable drainage  Paragraph 4.90	Addition to the existing policy to add a drainage hierarchy and the requirement that Developers should aim to achieve greenfield run off from their site through incorporating rainwater harvesting and sustainable drainage.  New sentence to state that boroughs should encourage the retention of soft landscaping in front gardens and other means of reducing or restraining the amount of hard standing associated with existing homes.	Support.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<p>Policy 4A.11 Water supplies and resources</p> <p>Paragraph 4.25ii</p>	<p>Additions to existing policy so that it relates to water resources as well as supplies. The Mayor will and boroughs should apply a maximum water use target of 40m<sup>3</sup> per bedspace per year for residential development.</p> <p>This should be achievable through using water efficient fixtures and fittings.</p>	<p>Support. Regarding monitoring of implementation, the Mayor should identify measures to support borough planners to ensure that design features identified in sustainability statements are actually implemented during the construction stage.</p>
<p>Paragraph 4.22i</p>	<p>New paragraph to support implementation of the Water Action Framework and an integrated approach to the planning of water, which engages all stakeholders and includes water supply, sewerage and drainage and takes account of the inter-action between them.</p>	<p>Support. Although the Mayor will produce a draft Water Action Framework, the Examination in Public Panel report noted the need for further dialogue between the Mayor and Thames Water and the need for a strategic approach in Policy 4A.11. Further consideration given to addressing water leakage as part of the wider issue of managing water supply.</p>
<p>Paragraphs 4.25, 4.25i and 4.25ii</p>	<p>Amendments to the existing paragraph and two new paragraphs to the supporting text of policy 4A.11 relating to water leakage, the use of potable water and the need to increasingly make use of grey water. The imposition of a water use target for residential development is explained.</p>	<p>Support. However, the Mayor should identify measures to support borough planners to ensure that design features such as internal fittings and white goods are actually implemented during the construction stage.</p>
<p>Policy 4A.13 Water and sewerage infrastructure</p> <p>Paragraphs 4.27 and 4.27i</p>	<p>Reference to the Thames Tideway Strategic Study and notes that the Mayor supports the option that provides a complete solution to this problem from Chiswick to Crossness. Thames Water will also be developing improvements at several of London's key waste water treatment works.</p>	<p>Noted.</p>
<p>Policy 4A.6 Improving air quality</p>	<p>The following addition to the list of bullet points:</p> <ul style="list-style-type: none"> <li>• promoting sustainable construction to reduce emissions from the demolition and construction of buildings (policy 4A.2)</li> </ul>	<p>Support.</p>



Reference (Policy / paragraph)	Summary of draft alteration	Council's response
Policy 4A.1 Waste strategic policy and targets	<p>The following added to the policy:</p> <ul style="list-style-type: none"> <li>• minimise the amount of energy used in the collection, transfer, movement and management of waste in line with the Mayor's target of reducing carbon emissions</li> <li>• promote generation of renewable energy and renewable hydrogen</li> <li>• minimise transport impacts from collection and transfer and movement of wastes to facilities within and outside London</li> <li>• achieve recycling or composting levels in commercial and industrial waste of 70% by 2020</li> <li>• achieve recycling and re-use levels in construction, excavation and demolition waste of 95 per cent by 2020</li> </ul> <p>Where waste cannot be recycled, the Mayor will encourage the production of energy from waste using new and emerging technologies, especially where it enables the generation of hydrogen.</p> <p>The Mayor will also consider, in preference to incineration, technologies that have the potential to produce renewable hydrogen from waste.</p>	Support. The North London Joint Waste DPD will consider options for managing all the types of waste that will be generated across the seven boroughs and will identify and safeguard sites for managing and recycling that waste using a mix of different technologies.
Policy 4A.2 Spatial policies for waste management	Deleted reference to proximity principle and added that communities should take more responsibility for their own waste and deal with it in one of the nearest appropriate installations.	Support.
Policy 4A.3 Criteria for the selection of sites for waste management and disposal	Addition to the environmental impact criteria to include impact on water resources.	Support.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<p>Policy 4A.21ii Additional land requirement for recycling and waste treatment facilities</p> <p>Table 4A.4 Waste to be managed in London apportioned by borough</p>	<p>Reference to the exercise being undertaken to apportion London's municipal and commercial and industrial waste at borough level. This will be included as a minor alteration as the work is still being undertaken.</p> <p>Table 4A.4 has been published as a minor alteration on 6 December 2006.</p>	<p>The final report detailing the waste apportionment methodology has yet to be made available. As such it is not possible to comment on the borough apportionment figures. One of the key inputs into the model is borough level assessments of employment land. There is a concern regarding the reliability of the desk-top assessments of employment land, particularly as the figures have been produced in advance of a review of Strategic Employment Locations.</p> <p>It has been recognised that there were inaccuracies in the original apportionment figures and that they have been republished. The Council assumes that the extended consultation period will not affect the overall timetable for the further alterations.</p> <p>Once the methodology has been published and been considered, the North London waste planning officers group will prepare a joint response on the apportionment figures.</p>
<p>Policy 4A.29i Land won aggregates</p> <p>Paragraph 4.11b</p>	<p>Sentence added regarding Appropriate Assessment (AA).</p>	<p>Support.</p>
<p>Policy 4A.21iv Broad locations suitable for recycling and waste treatment facilities</p> <p>New Map 4A.1i and New Table 4A.6</p>	<p>Policy, map and table to identify the broad locations suitable for recycling and waste treatment facilities</p>	<p>Object. The North London Joint Waste Development Plan Document will consider options for managing waste that will be generated across the seven boroughs and will identify and safeguard sites for managing and recycling that waste using a mix of different technologies. In advance of this document, it is considered that the identification of Strategic Employment Locations and Local</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>Employment Areas as broad locations for waste facilities is not appropriate.</p> <p>The Examination in Public Panel on the early alterations recommended (W25) that the Map (4A.1i) and Table (4A.6) be deleted.</p>
<b>CHAPTER 4B DESIGNS ON LONDON</b>		
Paragraph 4.35	New sentence to note that sustainable design, construction and demolition practices can also make an important contribution to adaptation and mitigation of further climate change.	Support
<p>Policy 4B.1 Design principles for a compact city</p> <p>Policy 4B.2 Promoting world-class architecture and design</p>	<p>Policies 4B.1 and 2 have been altered to reflect aspects of design including enhancing green networks and the Blue Ribbon Network.</p> <p>The Mayor will promote community involvement and, through the involvement of Design for London and other partners, will promote competitive selection of designers and design-led change in key locations.</p>	<p>Support. Altered Policies 4B.1 and 4B.2 do recognise the importance of impact of design on waterways and altered Policy 4C.28 seeks to maximise the use of canals for the transport of construction materials. However, there is a need for review of the Blue Ribbon Network given as the Water Framework Directive (WFD) 2000/60/EC seeks to integrate the management of water with land use planning, biodiversity, flooding, tourism, leisure, recreation, health and agriculture through River Basin Management Plans (RBMPs) (as referred to in paragraph 4.84i). The Environment Agency has identified London to be a single RBMP area. Reference to such plans in relation to Opportunity Areas and Areas of Intensification which include or adjoin parts of the Blue Ribbon Network.</p>
Paragraph 4.37i	The design of developments should contribute to the adaptation to and mitigation of climate change.	Support
Paragraph 4.49	Special attention should be given to the needs of children and young people. There should also be	Support

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	an appropriate balance between the needs of pedestrians and road users.	
New policy 4.B.4i London's Buildings: Retrofitting	The Mayor will and boroughs should support measures to produce a lower environmental impact from the existing stock of buildings by supporting policies and programmes for refurbishment of buildings which will reduce carbon emissions, increase thermal efficiency, reduce waste and noise impacts, conserve water materials and other resources (see Chapter 4A).	Support
Paragraph 4.49ii	Many of the policies in the London Plan are designed to guide new construction however the retrofitting of the existing building stock could make a significant contribution to achieving the sustainability aims of this plan.	Support
Policy 4B.5 Creating an inclusive environment	The principles of inclusive design should be used in assessing planning applications and in drawing up masterplans and area planning frameworks and design and access statements should be submitted with planning applications.	Support
New Policy 4B.5i Safety, security and fire prevention and protection	The Mayor will and boroughs should seek to create safe, secure and appropriate accessible environments.	Support
Paragraph 4.40i	Developers and boroughs should follow urban design principles that "design out crime" so far as possible in all types of developments.	Support
Paragraph 4.40ii	New development should be compatible with fire safety solutions and for major developments	Support
New Policy 4B.5.ii London's resilience and emergency planning	The Mayor will and boroughs should be aware of the spatial aspect of London's emergency plans.	Support
Paragraph 4.40iii	The Mayor will continue to provide support to coordinate pan-London local authority	Support

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	arrangements for responding to catastrophic incidents	
<b>CHAPTER 4C THE BLUE RIBBON NETWORK</b>		
Paragraph 4.84i	The Water Framework Directive requires all inland and coastal water bodies to reach "good" status by the end of 2015. This is likely to present some major challenges given the state of some of London's rivers.	Support.
Paragraph 4.103	Major new development projects close to navigable waterways should seek to maximise water transport for bulk materials.	Support.
Paragraph 4.131	Appraisals will be used to inform DPDs, AAPs and development control decisions. They also include specific implementation projects for local authorities, the UDC, other public agencies or other organisations in a position to implement river related projects. The strategies should be kept under regular review.	Support
Policy 4C.28 Development adjacent to canals	Altered policy to require all new developments adjacent to canals to, wherever possible, maximise the use of water for the transport of construction materials and for the removal of waste from site. Opportunities should be taken to improve the biodiversity of canals.	Support.
<b>CHAPTER 5 THE SUB-REGIONS, CENTRAL ACTIVITIES ZONE AND GOVERNMENT GROWTH AREAS</b>		
Section 5A, Policy 2A.1ii and Map 5A.1	New Policy 2A.1ii sets out a new sub-regional structure outlined in Map 5A.1 as the basis for sub regional planning and policy delivery. Particularly attention will be given to realizing the opportunities in the South East and North East sub regions. Revised Sub Regional Development Frameworks	The options for a new sub regional structure were considered in a Review of Sub-Regional Boundaries by Addison and Associates for the Greater London Authority in June 2006. The report considers five options.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	<p>will be produced.</p> <p>Paragraph 5.3 states that as with any boundaries, some issues and institutions do not fit exactly within them and the boundaries should be regarded as permeable.</p>	<p>The Addison and Associates report notes that altering the sub regional structure would involve considerable upheaval, change of practice and discontinuity of action, and that there needs to be a strong justification for making such changes.</p> <p>It is recognised that the other options have advantages and disadvantages. Option B would place Haringey in a North East sub region which would align with the Central Activities Zones, London-Stansted-Cambridge-Peterborough Growth Area, but would split rail corridors and some existing sub regional partnerships, such as the north London housing sub region and the North London Waste Authority.</p> <p>It appears that the main advantage of a radial structure (Options C, D and E) is that it links central boroughs, with limited development opportunities with greater opportunities in outer London, particularly in relation to housing and waste disposal. Option C, with a north London sub region, broadly aligns with the north London housing sub region and the North London Waste Authority, but splits the London-Stansted-Cambridge-Peterborough Growth Areas, the Central Activities Zone and main line rail corridors.</p> <p>Options D and E propose four radial sectors and raise similar issues to Option C. Option D includes Haringey within a North East sub region and aligns with the London-Stansted-Cambridge-Peterborough Growth Area and most main line rail</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>corridors. However it does not align with existing sub regional partnerships. Option E is similar to Option C, the only difference being in North London where Waltham Forest is included at the expense of Hackney.</p> <p>The Council considers that the Mayor should provide further justification for the new sub regional structure, in particular ensuring that the boundaries offer a 'best fit' with the growth areas, the Central Activities Zone and existing partnerships, such as the waste authority areas and the housing sub-regions.</p> <p>It is important that a future North London Sub Regional Development Framework identifies the significant borough differences in population growth, employment growth and socio-economic factors.</p>
<p>Section 5B North London Policy 5B.1 The strategic priorities for North London</p> <p>Policy 5B.2 Opportunity Areas in North London</p> <p>Table 5B.1 Opportunity Areas and Areas for Intensification in North London</p> <p>Paragraph 5.53</p>	<p>Policy 5B.1 sets out the strategic priorities for the proposed North London sub region.</p> <p>Policies 5B.2 and 5B.3 and supporting text set the general policy directions for planning frameworks for Opportunity Areas and Areas for Intensification in North London</p> <p>Table 5B.1 sets out indicative employment and housing capacity from 2001 to 2026. Upper Lea Valley Opportunity Area (including Tottenham Hale) covers 3,133 ha and has capacity for 15,000 jobs and 7,000 homes. Haringey Heartlands/Wood Green Area for Intensification has capacity for</p>	<p>It is recognised that the new strategic priorities reflect the composition of the proposed larger North London sub region.</p> <p>Policies 5B.2 and 5B.3 and Table 5B.1 are supported.</p> <p>It is noted that a footnote to the Table 5B.1 indicates that in many areas the transport system would not currently support this level of development and contributions would be required from the development to support this level of growth. Tottenham Hale interchange and gyratory is identified in Table 3C.1 and funding from the</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	<p>1,500 jobs and 1,700 homes.</p> <p>Paragraph 5.53 describes the role of Town Centres in North London. The Town Centres should be considered as opportunities for more intensive development and boroughs should consider how their roles could be consolidated or enhanced to meet retail and other consumer needs and to increase capacity for mixed use development including housing. It is intended that Brent Cross regional shopping centre will evolve into an integrated town centre. Wood Green has the potential to provide sustainable access to higher quality goods and services.</p>	<p>Community Infrastructure Fund has been secured for a new access road for Haringey Heartlands.</p> <p>Paragraph 5.40 – a Tottenham Hale Urban Centre Masterplan has been adopted.</p>
Section 5H Growth areas	Recognition of the Growth Areas of national importance that include parts of London. Policy commits the Mayor to work with partners to develop the linkages and capacity of the Growth areas.	Support.
<b>CHAPTER 6 IMPLEMENTING THE LONDON PLAN</b>		
The Mayor's powers and resources Paragraph 6.9i	Reference to the proposed changes to the powers and responsibilities of the Mayor and Assembly.	The further alterations should refer to the publication of the Greater London Authority Bill.
Policy 6A.3 Promoting Development New bullet point	New bullet point inserted on how the Mayor will through the London Climate Change Agency and the London Energy Partnership, facilitate the development of energy services companies to design, build, finance and operate decentralised energy approaches.	Support.
Policy 6A.5 Planning Obligations Paragraph 6.23	New sentence inserted stating that at the Mayor's request TfL has signed a number of Section 106 agreements, which will provide significant transport improvements.	Support.



Reference (Policy / paragraph)	Summary of draft alteration	Council's response
<p>Policy 6A.8 Phasing of Development and Transport Provision</p> <p>Paragraph 6.32</p>	<p>New sentence inserted regarding phasing and co-ordination of development. "The biggest demand will come from housing, waste facilities and schools. This will be offset by the controlled reduction in industrial land, higher intensity of development and the regular redevelopment that produces available development land".</p>	<p>The new London Plan does not fully address the impact of growth on social, transport and utility infrastructure and the relationship between the pace of development and infrastructure needs and capacity. It is essential that improvements to transport and social infrastructure meet the supply of new housing and job creation.</p> <p>Paragraph 6.32 states that, as a broad rule, there is sufficient land to accommodate projected growth. However, there is no analysis to support this assumption.</p>
<p>Table 6A.1</p>	<p>Table 6A.1 Indicative average annual phasing of growth in jobs and homes.</p>	<p>In its response to the early alterations on housing targets, the Council stated its support for the new borough housing target, which it considers is based on a realistic assessment of capacity. However, it acknowledged that an increase in new housing in adjoining boroughs will place additional pressure on education, health and transport services in Haringey.</p>
<p>Sub-Regional Strategies Paragraph 6.64</p>	<p>The LDA's Sub-regional Economic Development Implementation Plans (SREDIPs) provide a complementary vehicle. Both types of framework for the sub-regions will be revised to take account of the new sub-regional boundaries contained in this plan.</p>	<p>Support. See comments on proposed sub-regional structure.</p>
<p>Paragraph 6.68 Connecting London (bullet point 3)</p>	<p>TfL is producing a rail 2025 strategy and a Freight plan</p>	<p>Support.</p>
<p>Paragraph 6.68 Connecting London (bullet point 5)</p>	<p>TfL is producing guidance on Transport Assessments and travel plans, which contain advice on content, data analysis and examples of best practice.</p>	<p>Support.</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
Table 6B.1	Table 6B.1 London Plan Performance Indicators includes new targets.	Support new targets although some of the information on the matters to be monitored may not be available.
<b>Annex 1 London's strategic town centre network</b>  <b>Annex 2 Strategic Industrial Locations</b>	Minor alterations.	The Mayor is encouraged to carry out comprehensive reviews of London's strategic town centre network and Strategic Industrial Locations.
<b>Annex 4 Parking Standards</b>	<p>Table A4.1 now sets maximum standards for B1 development. Standards for B2 and B8 employment uses should have regard to the B1 standards although a degree of flexibility may be required to reflect different trip generating characteristics.</p> <p>Table A4.2 – Maximum residential parking standards uses bedroom sizes instead of housing type</p> <p>In some PTAL 5/6 locations outside central London, car park-free developments may also be appropriate. In central town centre locations, no additional parking provision should be made for bars, cafes, restaurants</p> <p>It is expected that parking provision for mixed use developments will be significantly lower than national standards in PPG 13 to reflect the higher levels of public transport access within London.</p> <p>Paragraph 21 - The starting point for meeting parking demand for new retail development should be use of the existing public off-street parking</p>	Support. The Mayor is encouraged to provide guidance on mixed use development.

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
	<p>supply.</p> <p>Paragraph 35 - Boroughs should take into account local issues and estimates of local demand for parking for disabled people in setting appropriate standards and should develop a monitoring and enforcement strategy which includes actions that prevent the misuse of spaces.</p>	
<b>Annex 5 Implementation of the Blue Ribbon Network</b>	Annex updated strategic actions for implementing the Blue Ribbon Network.	Support. The Mayor is encouraged to undertake a review of the Blue Ribbon Network policies.
<b>Annex 6 List of current and proposed Supplementary Planning Guidance</b>		Noted.
<b>Annex 10 Housing Provision Statistics</b>	<p>Table A in new Annex 10 contains the disaggregated housing provision targets for 2007/08 to 2016/17 showing the components of supply, ie vacant dwellings.</p> <p>Table B in new Annex 10 identifies indicative capacity ranges for additional homes 2017/18 to 2026/27</p>	<p>Table A is welcomed in response to Examination in Public Panel's recommendation.</p> <p>Table 6A.1 provides indicative annual phasing of growth in homes up to 2026/27 by sub-region. The figures are derived from the 2004 London Housing Capacity Study. Borough figures are shown on the same basis in a new Annex 10. Housing growth for 2017-2026 for Haringey is estimated to be in a range of 630-890 additional homes per annum.</p> <p>The Panel rebuffed the call for radical increases in housing supply but view the targets as minimums for the boroughs to exceed.</p> <p>Although these figures do not constitute targets, they should not be contained with the London Plan as part of the development plan for Haringey in advance of a 2011 London Housing Capacity or any borough housing capacity assessment. Policy</p>

Reference (Policy / paragraph)	Summary of draft alteration	Council's response
		<p>3A.1 refers to housing targets up to 2016/17 which will be reviewed by 2011 and paragraph 3.10 notes that the more traditional sources of housing supply and drying up and new options will have to be explored. As such the borough figures for 2017/18 – 2026/27 are premature. Paragraph 3.14ii refers to a commitment to review targets on a five yearly basis. Such future housing capacity studies should address transport, social and utility infrastructure provision.</p> <p>The Panel Report into the Early Alterations recommended (Recommendation H17) that the further alterations should give clarity as to how the integration of housing target delivery with related infrastructure provision is to be achieved, including the role of Sub Regional Development Frameworks. The report recommended that the further alterations should include a proposal for monitoring target delivery against the provision of associated infrastructure. It does not appear that these recommendations have been included.</p>