



**Haringey Council**

<b>Report for:</b>	<b>CABINET</b>	<b>Item Number:</b>	
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<b>Title:</b>	<b>Haringey's Local Plan - Site Allocations Development Plan Document (DPD)</b>
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<b>Report Authorised by:</b>	<b>Lyn Garner, Director, Place &amp; Sustainability</b>
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<b>Lead Officer:</b>	<b>Gavin Ball, Planning and Transport Policy x5132</b>
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<b>Ward(s) affected: All</b>	<b>Report for Key/Non Key Decisions: Key</b>
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**1. Describe the issue under consideration**

1.1 This report introduces Site Allocations Development Plan Document. The Cabinet report seeks Members' approval for public consultation on the document in January–February 2014.

**2 Cabinet Member introduction**

2.1 The Local Plan: Strategic Policies document was adopted by Council in March 2013. This document sets out the strategic vision and objectives that the Council will seek to achieve through its planning decisions in the forthcoming years.

2.2 In order to deliver the objectives of the Local Plan to deliver new homes, jobs, economic growth and improve social infrastructure, significant sites will need to be developed across the borough.

2.3 This report introduces the Site Allocations DPD, which in turn introduces the key development sites which will accommodate the majority of development in the borough over the next 20 years. In order to deliver the improvements that Haringey residents aspire to, the Council must have the appropriate powers necessary through the statutory planning system.



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2.4 The Site Allocations approach will help to build consensus in the community and with our various stakeholders and is a fair and objective legal basis for balancing competing priorities and promoting positive actions.

2.5 Haringey remains a listening Council, and in order to challenge the soundness of the evidence base within our DPD, the document will go through a public examination led by a planning inspector.

### **3 Recommendations**

3.1 This report recommends Cabinet

- Approve the draft Site Allocations Development Plan for public consultation (Regulation 18 consultation on the “subject matter”) as set out in Appendix A.
- Authorise the Lead Member in consultation with the Director of Place and Sustainability to amend Appendix A documents to improve presentation and content of the proposed “subject matter” to aid public engagement.

### **4 Alternative options considered**

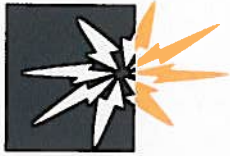
4.1 The Site Allocations DPD is a key component of the Local Plan portfolio of Local Development Documents. It helps provide detail for potential development sites and deliver the key objectives of the Council’s adopted Local Plan Strategic Policies.

4.2 The alternative is to not prepare a Site Allocations DPD, and to rely instead on the London Plan and Local Plan Strategic Policies to provide the basis for making planning decisions on the development of sites brought forward by the market. In some cases, site development briefs or other non statutory guidance could be prepared for sites of particular interest. There would be no formal statutory basis for engaging stakeholders, and opportunities to combine infrastructure and development synergies will not be exploited.

4.3 Without the Site Allocations DPD, the Council’s ability to bring forward a co-ordinated planned development of significant sites in the borough to deliver the Council’s strategic policies and priorities for development including housing supply, employment, social, physical and environmental infrastructure will be weakened. Statutory planning through DPDs is necessary for a sound framework for planning applications decisions and land assembly.

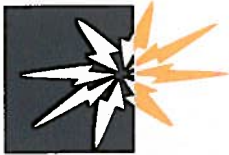
4.4 The statutory planning process is founded on evidence, consensus building through consultation, plan appraisal and independent examination. These processes are prescribed under the Planning and Compulsory Purchase Act 2004 and the Local Planning Regulations 2012.

### **5 Background information**



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- 5.1 The Site Allocations consultation draft identifies a set of sites the Council may seek to allocate to deliver the scale of growth and development set out in our Local Plan: Strategic Policies, and once adopted will form part of Haringey's statutory Local Plan. The role of this document is to establish the principle that a suitable form of development can be located on a particular site following relevant assessments, public consultations and statutory processes.
- 5.2 The draft Site Allocations DPD identifies land required over the period up to 2035 and beyond to deliver the scale of growth and development set out in Haringey's Local Plan: Strategic Policies adopted in March 2013 and the London Plan 2011.
- 5.3 It aims to ensure that the key sites in the borough are allocated for their optimum use to support sustainable growth, jobs, key infrastructure, and design and environmental quality objectives set out in the national, regional and local planning framework.
- 5.4 It also includes sites which are currently designated as employment land and raises the potential for change in the use of some of borough's employment land over the next 20 years. Where this is proposed, it is recognised that an Employment Land Study will be required to identify the inputs.
- 5.5 The Site Allocations DPD will:
- Identify the key sites in growth areas and areas of change in the planning framework for accommodating growth in the borough;
  - Plan for key sites to accommodate the majority of growth identified in the Local Plan: Strategic Policies and London Plan (2012);
  - Identify barriers and constraints to development on these sites and potential methods of overcoming them;
  - Where necessary, identify opportunities for interventions which may be required to secure the desired future of the site, or enhance the outcome on the site;
  - Engage the public with regards to potential future development in their local area;
  - Gather consultation responses from a wide range of stakeholders into the future proposed uses for a number of key sites in the borough;
  - Identifying opportunities for infrastructure and land use to be delivered in parallel;
  - Increase certainty and clarity for developers on key sites;
  - Introduce key design concepts to be considered when deciding planning
- 5.6 Once adopted, the document will guide planning decisions and will replace the Specific Site Schedules in the Unitary Development Plan. The allocation of a site does not necessarily mean that it will be developed straight away, although one of the intentions is to allocate sites which have the potential to enable suitable development to take place without undue delay.



5.7 The DPD will take around 2 years to prepare to reach the Adoption stage where a planning document has full weight for the determination of planning applications. The due process includes second stage ("Regulation 19", Proposed Submission) public consultation in summer/autumn 2014, leading to Submission for Examination in Public in 2015. See the flow chart in Appendix 1.

#### **Approach taken in the Site Allocation DPD**

5.8 The document is broken down by chapters relating to the themes identified in SP1 of the Local Plan: Strategic Policies DPD. Each chapter will be introduced with an overarching map showing the context of the key sites for that area. This will be similar to a key diagram in the Strategic Policies DPD. There will also be an opportunity here for discussion of the overall objectives for each area. The objectives being discussed will be a mixture of thematic and geographical, and will set the scene before each site is addressed individually.

5.9 The chapter heading are:

- Tottenham Hale Growth Area;
- Haringey Heartlands Growth Area;
- Wood Green Area of Change;
- North Tottenham/ Northumberland Park Area of Change;
- Tottenham High Rd Area of Change (including Tottenham Green and Seven Sisters);
- Highgate, Hornsey, Crouch End & Muswell Hill;
- South of the borough.

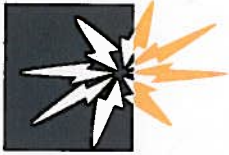
5.10 The Tottenham Area Action Plans which are being proposed elsewhere on this agenda will provide further context for decisions in relation to the individual sites in the Tottenham area identified in the Site Allocations DPD.

5.11 For each identified site the Site Allocation DPD sets out a profile including

- Maps;
- Site details: size, PTAL, source of nomination;
- The site allocation (the site's future use);
- Indicative development capacities;
- Existing policy designations;
- Design principles;
- Description of the surrounding area;

5.12 The sites have been identified through various documents, consultation, and base studies and internal officers' discussions. The sites came from variety of sources including

- GLA Strategic Housing Land Availability Assessment workshops (officer level assessments to inform London-wide housing supply);
- Haringey's "Call for Sites", existing planning permissions and pre-application meetings, and Crossrail 2 locations;



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- Existing Site Specific Proposals in the 2006 UDP.

5.13 The Site Allocations DPD also aims to identify locations where council owned property, land and houses/estates can be accessed for optimum use and improvements or where capacity exists to increase stock and mixture of use.

5.14 Some sites will have detailed information and clear development options. However, not all sites will have this level of details as their potential development is at an early stage and will rely on further information from baseline studies.

5.15 The document also offers scope for a comparison of existing and future planned infrastructure and the allocated sites, to explore the synergies that exist between them. These links will be made in the implementation considerations section of each site profile.

5.16 A latest draft version of the document is provided as Appendix 1.

**Key Implications**

5.17 The document includes sites currently designated as Employment sites and considers options and potential for alternative and complementary uses. The document does not recommend the reallocation of any designated employment allocations at this stage but it raises the potential for loss and change for some employment sites in Haringey over the next 20 years and beyond. This will be subject to an Employment Land Study which will identify the potential, and potential effects of redesignating employment land.

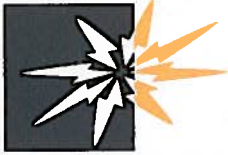
**Next Steps**

5.18 Below is a timetable designed to set out the progress of this document as part of the overall drafting of the Site Allocations DPD.

<b>Task</b>	<b>Completion Date</b>
CAB meeting	24 <sup>th</sup> Oct
Cabinet approval to consult	28 <sup>th</sup> Nov 2013
Consultation Period for Draft Document	January-Feb 2014
Analysis of consultation outcomes, complete evidence studies, and prepare the "Proposed Submission" draft DPD	Feb-May 2014
Seek Cabinet /Council agreement for "Proposed Submission" consultation	October 2014
Consultation on Proposed Submission DPD	October/November 2014
Submission to Planning Inspectorate	March 2015
Examination In Public (estimated)	June 2015
Adoption	December 2015

**Public Consultation**

5.19 The public consultation on the proposals is scheduled for January- February 2014. This will be a statutory 6-week consultation, and will meet all of the requirements of the relevant national regulations. It will follow the principles set out in the adopted Statement of Community Involvement, and will include the following:



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- Advert in local papers on consultation;
- Press Release, Haringey People article and information on Council's website
- Information in Public Libraries
- E-mail notification and Drop-in session for all councillors including ward councillors and the LDF Members Working Group.
- Letters to all those on our consultation database which include local community groups and residents, infrastructure providers, developers, statutory bodies, and neighbouring boroughs
- Offer to community groups and stakeholders to have meetings to discuss the proposals
- Attendance and/or exhibitions and presentations to Area Forums

## **6 Comments of the Chief Finance Officer and financial implications**

- 6.1 Implementation of the plan will most likely incur additional cost around consultation, evidence studies, publications and Examination in Public, at a future date. The exact costs are not known at this point but based on past experience could be around £100,000. Funding for upto £400,000 additional budget for Planning activity in the Tottenham area which includes this amount and costs related to the AAP report considered elsewhere on this agenda, will be considered as part of the 2014-15 budget-setting process and will need to be agreed by Cabinet before work can commence.
- 6.2 If the costs cannot be contained within the budget agreed for 14-15 then further funding will need to be agreed by cabinet as appropriate before work can proceed.
- 6.3 Development may well generate significant Section 106 or Community Infrastructure Levy payments that can be used to support wider capital investment, however the amounts within this report are indicative only at this point

## **7 Head of Legal Services and legal implications**

- 7.1 The Head of Legal Services has been consulted on the preparation of this report, and makes the following comments.
- 7.2 The National Planning Policy Framework (NPPF) makes clear that the Government's preferred approach is for each local planning authority to prepare a single Local Plan for its area (or a joint document with neighbouring areas).
- 7.3 While additional Local Plans can be produced, for example a separate site allocations document or AAP, there should be a clear justification for doing so.
- 7.4 Appropriate evidence is essential for producing a sound allocations document and the NPPF sets out the types of evidence that may be required. This should be focused tightly on supporting and justifying the particular policies in the allocations document.
- 7.5 The evidence needs to inform what is in the document and shape its development rather than being collected retrospectively. It should also be kept up-to-date.



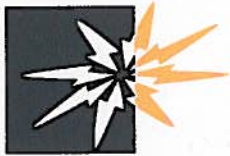
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- 7.6 The Government advises that local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a draft allocations document is published for consultation. This is said to help local communities and other interests consider the issues and engage with the authority at an early stage in developing the allocations document.
- 7.7 The allocations document, when adopted, would form part of the statutory development plan against which any subsequent applications for planning permission within the relevant areas would be tested.
- 7.8 That being the case, there is a formal process set out in the Town and Country Planning (Local Planning) (England) Regulations 2012 to be complied with, the first stage of which is the Regulation 18 consultation with such of the specific consultation bodies as the Council consider may have an interest in the subject of the proposed allocations document, along with such of the general consultation bodies as the Council considers appropriate and such residents or other persons carrying on business in the Council's area from which the Council considers it appropriate to invite representations. This exercise should also be carried out in accordance with the Council's Statement of Community Involvement (updated February 2011).
- 7.9 There is a requirement that the allocations document must be in conformity with the London Plan and in preparing the allocations document, the Council must take into account any representation made to them in response to the Regulation 18 consultations. There is also the statutory duty to co-operate with adjoining authorities set out in the Localism Act 2011.
- 7.10 Thereafter the allocations document must be published for consultation by the Council, together with other "proposed submission documents", before it can be submitted to the Planning Inspectorate for examination. This provides a formal opportunity for the local community and other interests to consider the allocations document, which the Council would like to adopt.

## **8 Equalities and Community Cohesion Comments**

### **These comments are yet to be approved by Equalities Officer**

- 9.1 Strategy and Business Intelligence have been consulted in the preparation of this report and they comment as follows:
- 9.2 Section 149 of the Equality Act 2010 creates a duty on the Council to have due regard to the need to:
- tackle discrimination and victimisation;
  - advance equality of opportunity;
  - foster good relations groups in the community.
- 9.3 This duty applies to all functions of the Council including the subject matter of this report.



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- 9.4 This report addresses a range of complex issues relating to the future of Haringey's communities. The key of the Site Allocations DPD is to help to deliver more employment, better housing, transport improvement, and other social outcomes for residents across the borough.
- 9.4 When delivered, the Site Allocations DPD should enhance the Council's performance of its equality duty. A full equality impact assessment will need to be undertaken to identify if, to what extent and which groups with a protected characteristic are likely to be adversely and disproportionately affected by any of the elements of the emerging AAPs and where such is the case, to consider what mitigation measures to propose.

## **9 Head of Procurement Comments**

- 9.1 The issue under consideration at this time does not have any procurement implications.

## **10 Policy Implication**

- 10.1 Some of the sites in Appendix 1 are Council-owned, and will thus be dependent on the Council deciding that these assets are available and suitable for redevelopment. This will involve ensuring that the Council retains access to the sites that it will need to continue to provide key services in the borough.

## **11 Reasons for Decision**

- 11.1 This document, when complete, will give certainty, further to the Local Plan: Strategic Policies DPD to developers, residents, and stakeholders regarding the scale, use and typology of development expected in key growth areas in the borough. It will also provide a planning basis for carrying out a range of actions to achieve the stated aims of the completed document and the Local Plan: Strategic Policies DPD.
- 11.2 The development of the Site Allocations DPD accords with Haringey's Local Development Scheme which is a document that provides an index and programme of development plan documents under preparation.

## **12 Use of Appendices**

Appendix 1: Draft Site Allocations DPD

## **13 Local Government (Access to Information) Act 1985**