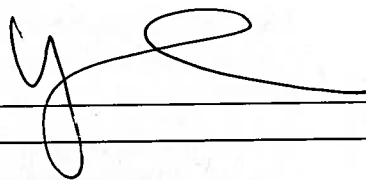




Haringey Council

Report for:	Cabinet Special Meeting 28/11/13	Item Number:	
Title:	Tottenham Area Action Plans 		
Report Authorised by:	Lyn Garner, Director Place and Sustainability		
Lead Officer:	Matthew Randall, Planning and Transport Policy ext 1859		
Ward(s) affected: Northumberland Park, Tottenham Hale, Tottenham Green, Seven Sisters, Bruce Grove, West Green, White Hart Lane	Report for Key Decisions: Key		

1. DESCRIBE THE ISSUE UNDER CONSIDERATION

- 1.1 This report introduces the proposed Area Action Plans (AAP) for Tottenham intended for public consultation in January–February 2014 and seeks Members' approval for the proposed approach to statutory area planning in the area, and the draft *Tottenham Area Action Plans Consultation Document* in Appendix A.

2. CABINET MEMBER INTRODUCTION

- 2.1 Haringey Council believes that Tottenham is an area of hugely under-utilised potential. Good-will currently exists both within national and regional government, and the private sector to help with Tottenham's regeneration. Major projects like the Tottenham Hotspur Football Club Northumberland Park Project already have planning permission.
- 2.2 The council is committed to transform Tottenham into a successful place that people want to live, work and stay. The best way of facilitating,

combining and directing all the elements that help to create a thriving, growing, attractive and successful place, is to ensure a joined up approach to economic and employment growth and investment, new housing developments, transport improvements and improved social infrastructure provision.

- 2.3 It is considered that the most efficient and appropriate mechanism that will deliver this to be a statutory planning document in the form of an Area Action Plan.
- 2.4 In Tottenham, the Area Action Plan (AAP) can help to do this through setting area based planning policy, changing land use designations and establishing the legal basis for the compulsory purchase of land.
- 2.5 This report sets out our commitment to delivering regeneration and transformational change in Tottenham through the statutory planning system.
- 2.6 The AAP approach will help to build consensus in the community and various stakeholders and is a fair and objective legal basis for promoting actions.
- 2.7 Haringey remains a listening Council, and in order to challenge the soundness of the evidence base within the AAP, the document will go through a public examination led by a planning inspector.

3. RECOMMENDATIONS

- 3.1 To approve the proposed statutory area planning approach for Tottenham.
- 3.2 To approve draft Tottenham Area Action Plans attached in Appendix A for public consultation (Regulation 18 Consultation).
- 3.3 To 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 prior to consultation.

4. ALTERNATIVE OPTIONS CONSIDERED

- 4.1 The Tottenham Area Action Plans are key components of Haringey's Local Plan portfolio. They will help deliver the key objectives of the Council's adopted Local Plan Strategic Policies for sustainable growth in the area.
- 4.2 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 Town and Country (Local Planning) (England) Regulations 2012.
- 4.3 The non-statutory planning route which would entail master planning would have to rely on Council land ownership and voluntary negotiations of planning projects with private interests.
- 4.4 As a result the non-statutory planning route was not considered robust enough to deliver the components associated with large scale regeneration aspirations such as complex land assembly projects. For this reason it was

concluded that an Area Action Plan is the appropriate mechanism for assisting delivery of planning projects, and reducing risks of legal challenge. Any master planning work such as that already carried out in the High Road West area would be incorporated into the AAP as evidence commissioned by the Council from independent planning consultants.

5. BACKGROUND INFORMATION

- 5.1 In February 2012 the Cabinet approved the appointment of masterplanners to develop an Investment Framework for Tottenham which would guide future development of the area. Details of this work are now emerging and full consultation with local communities to shape the content of the work is underway and planned to continue until next February. Full details of these proposals are set out in a separate report on this Cabinet agenda entitled Draft Strategic Regeneration Framework for Tottenham. It is timely therefore to also begin consultation through statutory process to ensure that support exists for significant change in the Tottenham area.
- 5.2 Tottenham is the most significant development opportunity in London for the next ten years. The opportunity to make better places for people to live, work and visit has been matched by significant government investment in Tottenham which includes a £500m borrowing guarantee to support housing and transport infrastructure in Tottenham.
- 5.3 The ambition to regenerate Tottenham is also reflected in regional and local planning policy designations. The London Plan indicates Tottenham Hale as a growth point and the wider Tottenham area as an opportunity area in the London Plan. This designation is also reflected in the Upper Lee Valley Opportunity Area Planning Framework which designates Tottenham as a growth area and Haringey's Local Plan which designates Tottenham Hale as a Growth Area and Northumberland Park and the Tottenham High Rd/ Bruce Grove as an Area of Change (including Tottenham Green).
- 5.4 The development of AAPs in the Tottenham area will accord with **Haringey's Local Development Scheme**, a statutory document that provides an index and programme of development plan documents under preparation. An Area Action Plan is considered to be the most appropriate planning mechanism for assessment and delivery of sustainable growth, improving environmental and design quality, jobs and infrastructure in the area.
- 5.5 An AAP helps to create a framework for land assembly and investment which makes place shaping a reality in line with national, regional and local planning priorities. It helps to deliver local aspirations for an area in the form of housing, design, public realm, access, open space, employment, social infrastructure and transport improvements.
- 5.6 The purpose of the consultation document in Appendix A is to announce to the community and relevant stakeholders that we are commencing work on two separate but interrelated AAPs in the Tottenham area. The Regulation 18 document's purpose is to involve the community and stakeholders in shaping and informing these plans which are at the initial stage of

preparation. The document will therefore invite comment on the key issues and challenges facing the area.

The two proposed AAP areas are Northumberland Park and South Tottenham. The two indicative boundaries to these areas are shown on the Tottenham AAP area map in the Regulation 18 document.

- 5.7 In order to guide regeneration in the Tottenham area a number of evidence based documents have been completed and are still emerging. These documents will also be a fundamental part of the AAP's approach.
- 5.8 This report and the Regulation 18 document should be read as part of a portfolio of documents whose programmes and objectives are interrelated. The documents include the Draft Site Allocations DPD, the Housing Investment and Estate Renewal Strategy, The High Road West Regeneration Project (Master Plan Option Consultation Feedback and Next Steps) and the Tottenham Strategic Regeneration Framework Update.

6. THE COUNCIL'S APPROACH TO AAP PRODUCTION

- 6.1 At the Regulation 18 AAP stage one approach to meeting the planning consultation regulations is to produce a comprehensive draft of the AAP document. However, for a number of reasons, Haringey Council is justified in producing a more succinct and focused Regulation 18 consultation document that focuses on the key challenges and issues for development in the area.
- 6.2 The reasons supporting this approach are as follows. Firstly, the issues and opportunities in Tottenham are so extensive and complex that a draft Area Action Plan document at this stage would be resource and time intensive and secondly that the emerging and completed Tottenham related evidence base gives us a strong basis for promoting growth and change in the area. The regulations allow us to take this approach.
- 6.3 Following receipt of public representations on the Regulation 18 consultation document, a more detailed document will be produced for the Regulation 19 Pre Submission stage (see timeline below). A flow chart in Appendix A also sets out the key stages, timetable and relationship to other Tottenham consultations.

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

- 6.8 The first consultation will commence in January 2014, to coincide with the consultation on the Draft Site Allocations DPD. This will be a statutory 6-week consultation, and will meet all of the requirements of the relevant national regulations. This will include full and extensive consultation with interest groups and ward councillors.
- 6.9 The council has adopted a document called a Statement of Community Involvement, which sets out the consultation principals for planning documents. As a result AAP consultation will include the following:
- An advert in local papers on consultation;
 - A press release, 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 (around 3000 contacts) 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 Assemblies and Community Liaison Groups

It is important to note the Area Action Plans development will also react and relate to emerging and existing planning documents such as the Tottenham Hale SPD, the Development Management DPD and the Site Allocations DPD. The Sites Allocation DPD is being recommended separately.

7. COMMENTS OF THE CHIEF FINANCE OFFICER AND FINANCIAL IMPLICATIONS

- 7.1 There are financial implications of the AAP process related to staffing costs within Planning Policy to manage the process and the cost of commissioning evidence studies, sustainability appraisal and viability assessments, running consultation and publication of documents. The total cost of delivering the policy documents is estimated to be £400,000 across 2014-15 and 2015-16 and includes cost related to the sites DPD dealt with elsewhere in the agenda. These costs will be considered as part of the 2014-15 budget-setting process and will need to be agreed by Cabinet before work can commence.
- 7.2 If the costs of the AAP process are projected to exceed the allocated budget, further funding will need to be identified before related work can proceed.

8. HEAD OF LEGAL SERVICES AND LEGAL IMPLICATIONS

- 8.1 The Head of Legal services has been consulted on the preparation of this report, and makes the following comments.
- 8.2 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).
- 8.3 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.
- 8.4 Appropriate evidence is essential for producing a sound AAP 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 AAP.
- 8.5 The evidence needs to inform what is in the AAP and shape its development rather than being collected retrospectively. It should also be kept up-to-date.
- 8.6 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 AAP 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 AAP.
- 8.7 The AAPs, 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.
- 8.8 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 AAPs, 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).
- 8.9 There is a requirement that the AAPs must be in conformity with the London Plan and in preparing the AAPs, 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.

- 8.10 Thereafter the AAPs 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 AAP, which the Council would like to adopt.

9. EQUALITIES AND COMMUNITY COHESION COMMENTS

- 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.
- 9.4 This report addresses a range of complex issues relating to the future of Haringey’s communities. The key elements of the AAP Reg 18 document focuses on the east of the borough and should help to deliver more employment better housing, transport improvement and other social outcomes for its residents which as well as having a high level of deprivation, also has a high concentration of black and minority ethnic communities and other groups who possess other of the characteristics identified and protected by sections 4 to 12 of the Equality Act 2010.
- 9.5 When delivered, Area Action Plans 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.

10. HEAD OF PROCUREMENT COMMENTS

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

11. POLICY IMPLICATION

- 11.1 The proposed AAP will be in line with Council’s aspirations for the regeneration of Tottenham which is articulated in the, Haringey’s Local Plan, its Sustainable Community Strategy and A Plan for Tottenham. Using a process defined under Planning Regulations it will communicate the issues, options and decisions required, and build consensus on the way forward.

- 11.2 Where appropriate the approach to consultation will sharpen the areas of choice for an evidence-based debate on the issues. The AAP would also align investment programmes, facilitate land assembly and development through Compulsory Purchase Order where appropriate, and balance programmes delivery of housing, jobs, infrastructure and environmental improvement. The Council's property portfolio may also influence the form of the AAP's spatial strategy.

12. REASONS FOR DECISION

- 12.1 The option discussion articulated under para 4.1 and 4.2 concluded that the most effective way of ensuring the regeneration of Tottenham in accordance with adopted council policy is through Area Action Plan development.

13. USE OF APPENDICES

Appendix A Tottenham Area Action Plans Consultation Document

14. LOCAL GOVERNMENT (ACCESS TO INFORMATION) ACT 1985

- 14.1 There are no exempt elements to the report or Tottenham Area Action Plans Consultation Document.