

Executive Meeting**On 20 December 2005****Report Title:** Draft Alterations to the London Plan**Forward Plan Reference Number:** 2005/090**Report of:** Anne Fisher, Director Environmental Services**Wards(s) affected:** All**Report for:** Key Decision**1. Purpose**

- 1.1 To consider and agree the Council's response to the draft Alterations.

2. Introduction by Executive Member

- 2.1 The Executive Committee is asked to agree the Council's response to draft alterations to the London Plan, the deadline for the submission of this response being 20th January 2006. These alterations seek to revise the Housing Targets set for London and as a consequence for Haringey; set six new Waste policies for London; and adopt a London-wide policy for Minerals. The Council's response only seeks to deal with the first two as the third, on minerals, does not affect Haringey. Our response fully welcomes the revision of the Housing Targets as being more realistic with Haringey's target now being set for 6,800 new homes over the period 2006/7 to 2016/17 or 680 homes per annum. We further welcome the scope given to retain surplus employment land for projected economic growth. The response to the new Waste polices is more critical not least in identifying possible new waste facilities in the Borough

3. Recommendation

- 3.1 That the responses to the draft alterations to the London Plan as set out in Appendix 1 be agreed and submitted to the Mayor of London.

Report Authorised by: Anne Fisher, Director Environmental Services**Contact Officer:** Malcolm Souch, Team Leader Planning Policy (extension 5590)

4. Executive Summary

- 4.1 The draft alterations to the London Plan comprise new borough housing targets and altered and new policies for waste and minerals. A sustainability appraisal report accompanies the draft alterations. The alterations have been published for public consultation and the closing date for comments is 20 January 2006.
- 4.2 The London Plan forms part of Haringey's statutory development plan. Haringey's Unitary Development Plan is required to be in general conformity with the London Plan. The UDP and the subsequent Local Development Framework will need to reflect a new housing target and make provision for waste management facilities.

5. Reasons for any change in policy or for new policy development

- 5.1 The draft alterations to the London Plan have been prepared by the Mayor of London for public consultation under the provisions of s341 of the Greater London Authority Act.

6. Local Government (Access to Information) Act 1985

- 6.1 The following documents were used in the preparation of this report:-
- Draft Alterations to the London Plan (Spatial Development Strategy for Greater London). Housing Provision Targets, Waste and Minerals (October 2005).
 - London Plan - Spatial development Strategy for Greater London (February 2004)
 - 2004 London Housing Capacity Study, Major of London (July 2005)
 - Recycling and Recovery Facilities – Site Investigation in London, prepared by Land Use Consultants and SLR Consulting Ltd for the Greater London Authority (July 2005)

7. Background

- 7.1 The London Plan was published in February 2004. When the Plan was published, the Mayor of London made a commitment to undertake research on housing capacity and waste recycling and treatment and to bring forward alterations to update policies on housing provision, waste and minerals.

8. Description

8.1 Housing Provision Targets

- 8.1.1 The London Plan included housing provision targets based on the London Housing Capacity Study published in 2000. However, it was recognised that the London wide target of 23,000 additional homes would not meet projected household and population growth or reduce the backlog of existing unmet housing need. As a result, a new housing capacity study was carried out to identify capacity towards an output of 30,000 new homes each year.

- 8.1.2 A new housing capacity study was published in July this year. It was carried out with the co-operation of all London boroughs and the City Corporation. Haringey

was represented on the officer steering group.

- 8.1.3 The Council considers that the current London Plan target for Haringey of 19,370 dwellings for the period 1997-2016 (970 dwellings per year) is unrealistic and it has welcomed the new capacity study. The new housing targets are based on this capacity study.
- 8.1.4 Initial consultation on the housing provision targets in July 2005 indicated a target for Haringey of 7,200 dwellings for the period 2007/08-2016/17. Since this consultation, further data from has been made available on vacant dwellings, which has refined this element of housing capacity.
- 8.1.5 The alterations now identify capacity for 310,900 homes over the ten-year and a figure for Haringey of 6,800 dwellings or 680 dwellings per year. The new housing target represents a significant reduction in the annual dwelling requirement, and although still challenging is based on a more realistic assessment of capacity. In 2004, 834 dwellings were completed in the Borough.
- 8.1.6 The housing targets come into effect from April 2007 and will be used for the basis of monitoring up to 2016/7. This figure will be reviewed by 2011 and periodically thereafter. As part of its Annual Monitoring Report, Haringey is required to demonstrate a housing output trajectory for achieving the annual target over the 10 year plan period.
- 8.1.7 The London Plan Policies 3A.1 and 3A.2 have been altered to reflect the results of the London Housing Capacity Study and to reflect the Planning and Compulsory Purchase Act 2004. Three important alterations have been made to Policy 3A.2 and the supporting text:-
- To acknowledge that whilst boroughs may wish to change the use of surplus employment to residential or mixed use development, they may also want to protect land supply for projected employment growth and required waste facilities.
 - Intensification of housing provision through development at higher densities should be consistent with the principles of sustainable residential quality and thereby have regard to setting and character of an area, public transport accessibility and housing type.
 - To recognise that the delivery of the housing targets is dependent on adequate funding for transport infrastructure, social infrastructure and affordable housing. Consequently the housing targets will be reviewed on a five yearly basis.

8.2 Planning for Waste

- 8.2.1 The Mayor of London made a commitment in the London Plan to evaluate the adequacy of London's existing waste management and disposal facilities to meet London's future needs. Currently London recycles half its waste. With population growth, the amount of waste will increase. A national policy aim is that most waste should be treated or disposed of within the region in which it is produced. (regional

self-sufficiency). The new and altered policies also seek to address regional self-sufficiency and reduce London's dependence on landfill and increase rates of recycling and recovery.

8.2.2 The alterations make amendments to the existing London Plan waste policies and propose six new waste policies.

1. Boroughs should protect existing waste sites and facilitate the maximum use of existing waste sites.
2. Boroughs are required ensure that the additional land requirement for recycling and waste treatment can be met through making provision in their development plan documents.
3. Boroughs should identify a range of waste management facilities to manage a capacity of 13.5 million tonnes of municipal and commercial/ industrial waste within London by 2020.
4. Boroughs should identify adequate provision for the scale of waste use identified. The broad locations for these facilities are Strategic Employment Locations, Local Employment Areas, and existing Waste Management Sites.
5. Boroughs should support new construction and demolition waste management facilities in London.
6. The Mayor will work in partnership with the Boroughs, the Environment Agency and industry to provide and maintain direction on the need for hazardous waste management capacity.

8.2.3 In relation to new waste policy 4, a Recycling and Recovery Sites Investigation in London identified certain boroughs as providing the greatest site opportunities for new recycling and waste treatment facilities. Haringey is identified as one of these boroughs. It is noted that this identification is at a strategic level and should be seen in the context of providing sufficient potential capacity to meet a sub-regional requirement. As stated in new policy waste 2, boroughs are required to work together to allocate this sub-regional requirement.

8.2.4 The sites investigation study identified that the majority of site opportunities in the North London sub-region are based in the industrial areas of the Lea Valley. Although new policy 4 and the supporting tables are not clear, it is to be concluded that Haringey is identified as a borough with new site opportunities because it contains a possible broad location for new facilities in the Central Leaside Business Area Strategic Employment Location in North Tottenham.

8.3 Planning for Minerals

8.3.1 A new policy is proposed for minerals in response to national guidance. The provision of aggregates in London can be met from reserves in East and West London. However, a new paragraph notes that there remains some potential for extraction elsewhere in London other than the sub-regions identified, including the Lea Valley. Boroughs with resources identified should consider opportunities in line with the policies in the Plan. There are no aggregate extraction sites or identified reserves in Haringey. New waste policy 5 encourages further recycling of construction and demolition waste.

8.4 Sustainability Appraisal

- 8.4.1 The draft alterations are accompanied by a sustainability appraisal report. The appraisal process identified three policy options for housing growth, three options for waste and two options for minerals. These options were tested against a sustainability appraisal framework comprising the 33 objectives used for the sustainability appraisal of the London Plan. The options were tested at a regional and sub-regional level. However, it is acknowledged that impact of the options will largely occur at a local level through the implementation of UDP/LDF policies.
- 8.4.2 For housing, the three options were derived from the scenario-testing phase of the housing capacity study. The middle option (option 2) of 30,000 homes per annum was found to be the more sustainable option. The appraisal did identify a conflict between all the options for housing growth and the objectives of reducing flood risk, reducing car dependency and reducing household waste.
- 8.4.3 For waste, option 3 (85% self-sufficiency by 2020 and sub-regional distribution of central London's excess waste, including 20% to North London) was identified as the more sustainable option. A more even distribution of waste management facilities in London was found to have overall less negative impacts.
- 8.4.4 For minerals, option 2 (with less aggregates extraction and higher rates of reuse of construction and demolition waste) was found to be the more sustainable option. This option was considered to be more viable given the scarcity of minerals resources within London and high dependence on importing minerals from other regions.

9. Consultation

- 9.1 The Mayor of London is responsible for consultation on the draft alterations to the London Plan. Public consultation of the draft alterations will close on 20 January 2006. An Examination in Public on the alterations is scheduled for June - July 2006. Following the receipt and publication of the Panel Report in November 2006 it is intended that the London Plan Alterations be published in February 2007. The alterations will come into effect from April 2007.

10. Summary and Conclusion

- 10.1 The London Plan forms part of Haringey's statutory development plan. Haringey's Unitary Development Plan is required to be in general conformity with the London Plan. The UDP and the subsequent Local Development Framework will need to reflect a new housing target and make provision for waste management facilities. It is therefore important that the Council responds to the draft alterations to the London Plan.

11. Recommendations

- 11.1 That the responses to the draft alterations to the London Plan as set out in

Appendix 1 be agreed and submitted to the Mayor of London.

12. Comments of the Director of Finance

12.1 The Council's response to the draft alterations to the London Plan does not give rise to any immediate financial implications. However, proposals within the London Plan may have financial consequences for the Council, e.g. the North London Waste Development Plan, the financial impact of which have already been considered by Members, and in other relevant areas these will need to be considered as and when specific proposals are developed further.

13. Comments of the Head of Legal Services

13.1 The London Plan is part of the statutory framework guiding development decisions. The revision of the Housing targets to a level of provision which appears to be achievable is to be welcomed from a point of view of legal compliance as well as service provision.

13.2 So far as waste management provision is concerned, the Joint Waste Development Plan Document being prepared by the 7 Boroughs in the North London Waste Authority in their capacity as Local Planning Authorities is the correct procedure. The study of the seven Boroughs will be the subject of all the relevant applicable procedures in the Development Plan Regulations

14. Equalities Implications

14.1 The London Plan is the responsibility of the Mayor of London. The London Plan addresses equalities and diversity.

15. Appendices

15.1 Appendix 1 – Comments on the Draft Alterations to the London Plan

Appendix 1 – Comments on the Draft Alterations to the London Plan

Reference	Draft Alteration	Council's Response
Housing Provision Targets		
Policy 3A1 Increasing London's supply of housing	The alteration includes a new minimum London wide target of 31,090 additional homes per year. The borough targets in Table 3A.1 will be used as the basis of monitoring up to 2016/7 and will be reviewed by 2011.	The Council welcomes the new capacity study and the new housing targets. The alteration to monitor the targets by 2011 accords with a plan monitor manage approach to housing provision and recognises that housing delivery is dependent on market factors and the provision of necessary transport, social and utility infrastructure.
Policy 3A.2 Borough housing targets	The alteration to the policy acknowledges that while boroughs may wish to change the use of surplus employment to residential or mixed-use development, they may also want to protect land supply for projected employment growth and required waste facilities.	The Council welcomes this alteration. It accords with the approach taken in the Council's emerging UDP. With regard to waste facilities, see the response to new waste policy 4.
Policy 3A.2 Borough housing targets	The alteration to the policy acknowledges that housing development at higher densities should be consistent with the principles of sustainable residential quality and thereby have regard to the setting and character of an area, public transport accessibility and housing type.	The Council welcomes this alteration. It accords with approach taken in the Council's emerging UDP. It is worth noting that the 2004 London Housing Capacity Study used the mid-point of the density ranges set out in Table 4B.1 of the London Plan to assess the capacity of potential housing sites. It also assumed changes to public transport accessibility from 2011. Therefore, the Mayor should consider a review of the density ranges in Table 4B.1 as part of the London Plan review to reflect progress towards the housing targets and changes to public transport accessibility.
Table 3A.1 Housing provision: Targets for additional homes 2007/8 to 2016/17	The new housing target for Haringey is 6,800 additional homes for 2007/8 to 2016/17, or 680 homes per annum.	The Council supports the new borough housing target, which it considers is based on a realistic assessment of capacity. However, it acknowledges that an increase in new housing in adjoining

Reference	Draft Alteration	Council's Response
		boroughs will place additional pressure on education, health and transport services in Haringey.
Paragraph 3.14a	The delivery of the housing targets is dependent on adequate funding for transport infrastructure, social infrastructure and affordable housing.	The Council welcomes this paragraph. In responding to the draft North London Sub-Regional Development Framework, the Council expressed its concern that the document lacked visible plans and proposals for essential infrastructure. The final SRDF must provide more detail on this and the relationship between housing growth and infrastructure requirements should be fully addressed in the first London Plan review.
Paragraph 3.14b	Boroughs should monitor their housing target using a housing trajectory.	This paragraph is not required as it duplicates national planning guidance.
Waste		
Policy 4A.2 Spatial policies for waste management	The new bullet point that DPD policies should “require, where feasible, the re-use of surplus waste transfer sites for other waste uses”	This policy will have implications for sites that are temporarily used for waste management. For example, Hornsey High St recycling and re-use centre is identified in the UDP as part of Haringey Heartlands (a major area of change) and will be redeveloped in the future. The policy should not apply to temporary sites.
New paragraphs 4.10a – 4.10d	The new paragraphs reflect national planning policy in PPS10 Planning for Sustainable Waste Management.	The Council supports the addition of references to PPS10.
New waste policy 1: Existing provision – capacity, intensification, re-use and protection	Boroughs should protect existing waste sites and facilitate the maximum use of existing waste sites. If for any reason an existing waste management site is lost to non-waste use, an additional compensatory site provision will be required.	The Council is concerned that this policy may have a negative impact on temporary waste management arrangements. See response above. There needs to be flexibility where temporary arrangements exist and the loss to a non-waste use is planned for.
New waste policy 2: Additional land requirement for recycling and	244ha of land is required between 2005 and 2020 for waste management sites. The policy requires	The Council supports this policy. The words “per annum” should be deleted from the first sentence of

Reference	Draft Alteration	Council's Response
waste treatment facilities	London boroughs to ensure this can be met through making provision in their development plan documents.	paragraph 4.10i.
New waste policy 3: Numbers and types of recycling and waste treatment facilities	Boroughs in their development plan documents should identify a range of waste management facilities to manage a capacity of 13.5 million tonnes municipal and commercial/ industrial waste.	The Council supports the policy. However, it considers that new paragraph 4.10m is unnecessary. Boroughs will need to weigh up the competing demands on land and the proximity principle will be considered when looking at potential waste sites.
New waste policy 4: Broad locations suitable for recycling and waste treatment facilities	<p>Boroughs in their development plan documents should identify adequate provision for the scale of waste use identified. The broad locations for these facilities are:</p> <ul style="list-style-type: none"> • Strategic Employment Locations (Preferred Industrial Locations and Industrial Business Parks), • Local Employment Areas, and • Existing Waste Management Sites. 	<p>The relationship between paragraphs 4.10o and 4.10p, Map 4A.1 and Table 4A7 needs to be clarified, as it is currently unclear and misleading. The Recycling and Recovery Sites Investigation study identifies Haringey as a borough with new site opportunities because it contains a possible broad location for new facilities in the Central Leaside Business Area Strategic Employment Location in North Tottenham. Table 4A7 is incorrect as it attributes the Central Leaside Business Area to Enfield and Waltham Forest.</p> <p>It is important to recognise that the study's appraisal of potential new waste sites only used a limited range of criteria developed in consultation with a small number of consultees. It did not, therefore, represent a detailed siting study. The detailed identification of individual waste sites is a process that will need to be carried out by London boroughs with planning judgement applied at the local level.</p> <p>Therefore, the Council considers it inappropriate for the London Plan to identify specific locations for waste management. As such, paragraph 4.10o,</p>

Reference	Draft Alteration	Council's Response
		Map 4A.1 and Table 4A7 should be deleted. The seven boroughs of the North London Waste Authority are working together to produce a Joint Waste DPD. This process will identify sites for waste management on a sub-regional basis.
New waste policy 5: Construction and demolition waste	Boroughs should support new construction and demolition waste management facilities in London. There is no additional permanent new site provision identified up to 2020. However, the recycling of construction and demolition waste is encouraged at existing sites and aggregate extraction sites. Also, boroughs should ensure, where practicable, that construction and demolition waste is recycled during construction on major development sites using temporary on-site mobile facilities. Developers are required to produce site waste management plans.	The Council supports the policy if it relates solely to existing construction/demolition sites. It would not support household Reuse & Recycling Centres taking non-household construction and demolition wastes. Clarification is required of what is meant by 'existing sites'. Developers should be required in their site waste management plans to address the adverse environmental impacts of the on-site mobile recycling facilities. There will be instances where these mobile facilities are inappropriate because of the impact they would have on surrounding residential areas.
New waste policy 6: Hazardous waste	The Mayor will work in partnership with the Boroughs, the Environment Agency and industry to provide and maintain direction on the need for hazardous waste management capacity.	This is a London wide issue and will need to be considered as part of the Joint Waste DPD.
Minerals		
New minerals policy 1: Land won aggregates	In response to MPG6 guidelines, London is required to make provision for an output of 1 million tonnes (mt) of land won aggregate per annum until 2016. This should be met by an apportionment of: <ul style="list-style-type: none"> • 0.5 mt to East London (LBs Havering and Redbridge) • and 0.5 mt to West London (LBs Ealing, Hillingdon, Hounslow and Richmond-upon- 	This policy does not have a direct impact on Haringey. The policy states that the provision of aggregates in London can be met from reserves in East and West London. The Council supports this policy which reflects the option identified in the sustainability appraisal for less aggregate extraction and higher rates of reuse of construction and demolition waste.

Reference	Draft Alteration	Council's Response
	<p>Thames).</p> <p>A minimum land bank of seven years output should be maintained in London. Boroughs with reserves outside the apportionment areas should consider proposals for extraction in line with policies in the Plan.</p>	