Report for: Regulatory Committee January 8 2018

Item number:

Title: Wood Green Area Action Plan and Strategic Regeneration

**Framework** 

Report

authorised by: Lyn Garner, Director, Regeneration, Planning & Development

Lead Officer: Emma Williamson/ Matthew Patterson

Ward(s) affected: Noel Park, Woodside, Harringay, West Green, Alexandra,

**Bounds Green** 

Report for Key/

Non Key Decision: Key

#### 1. Describe the issue under consideration

- 1.1 Haringey has been developing its Investment Framework for Wood Green since 2014, in consultation with residents, businesses and landowners. The Investment Framework refers to suite of documents and strategies which provide a framework for the social, economic and physical regeneration of the area.
- 1.2 The Strategic Regeneration Framework, the subject of this report, sets out the overarching vision and objectives for Wood Green and will underpin current and future documents.
- 1.3 The Area Action Plan sets out the planning policy framework for Wood Green, creating a positive, statutory basis for determining planning applications. This report should be read in conjunction with the Wood Green Area Action Plan Report, elsewhere on the agenda.
- 1.4 The Wood Green Area Action Plan (AAP) is a key planning document required to help govern and shape the future regeneration of the Wood Green (including Haringey Heartlands) area. The Council undertook consultation on a 'preferred option' draft of the AAP in February 2017. This sought to explore the opportunities to tackle existing issues and to build on the area's strengths, including its capacity to accommodate further employment, housing and retail growth, associated with the prospect of Crossrail 2 serving the Metropolitan town centre.
- 1.5 With uncertainty over the funding and delivery of Crossrail 2, it is appropriate that the AAP is revised, such that the growth and development proposed within



the AAP is not contingent or predicated upon the future provision of Crossrail 2. However, even in the absence of this significant transport enhancement, it remains that there is much development interest in sites in and around Wood Green, that the High Street is in need of rejuvenation, and existing issues around traffic and access prevail. The AAP therefore remains essential in articulating our shared future vision for the area as a whole, coordinating improvements and development, and providing clarity around the contribution individual sites will make.

- 1.6 This paper sets out the response to consultation on the previous 'preferred option' AAP consultation, how these have informed the revised draft AAP, and the key changes between the current and the previous version. It seeks Cabinet approval to publish the revised 'preferred option' draft for a further round of consultation (Regulation 18) prior to confirming the final draft of the AAP (Regulation 19) to take forward for independent examination.
- 1.7 Officers are also developing a Development Infrastructure and Investment Funding Study and Delivery Plan which will set out projects and priorities for the short, medium and long term.

#### 2. Recommendations

- 1. That Regulatory Committee notes the findings of the February 2017 'preferred option' consultation on the Wood Green Area Action Plan ("AAP"), as set out in the consultation report at Appendix A.
- 2. That Regulatory Committee notes the key changes between the previous and the revised 'preferred option' versions of the AAP, as set out at paragraphs 6.6 and 6.7.
- 3. That Regulatory notes the revised "preferred option" Wood Green AAP, as set out in Appendix B, for publication for public consultation and puts forward its comments for consideration at Cabinet.
- 4. That Regulatory committee notes the proposal to revoke the now out of date Haringey Heartlands Development Framework (2005).
- 5. That Regulatory Committee notes the proposal to adopt the Wood Green Strategic Regeneration Framework (Appendix A), to be published in March 2018 and puts forward its comments for consideration at Cabinet.

#### 4 Reasons for decision



- 4.1 Wood Green has a number of strategic brownfield and regeneration sites and prime town centre redevelopment sites, offering significant potential for new jobs and homes, a better choice of retail and leisure and better east west connectivity.
- 4.2 Since 2014 officers have been developing an Investment Framework for Wood Green comprising several strategic and delivery documents. The intention is that the Strategic Regeneration Framework (SRF) sets the direction for the regeneration of Wood Green with a clear vision and objectives, aligning goals and strategies for physical change with those for wider social and economic improvements.
- 4.3 Major landowners are already developing proposals for sites in Wood Green, including Clarendon Square (the former gas works site) which already has planning permission for over 1,000 homes, and Planning Applications have now been received for three sites in Heartlands area totalling 2,000 homes (including a new Planning Application for Clarendon Square for 1,600 homes). Haringey is in Pre Application for a further four sites in the growth area.
- 4.4 By adopting the plan Cabinet are endorsing the overarching ambition for the regeneration of Wood Green. This will ensure a clear set of priorities which can be communicated to stakeholders and partners. The SRF will be used to communicate the vision and priorities with residents, businesses, landowners/ developers and statutory partners. The SRF is also an essential tool for fund raising and lobbying.
- 4.5 The AAP is required to provide the planning framework needed to clearly articulate how the Council intends to regenerate Wood Green, ensuring public and private development and investment decisions are coordinated and deliver the strategic objectives sought.
- 4.6 Once adopted, the AAP will:
  - Revitalise the town centre and surrounding area through the provision of development providing 4,000 new jobs and 6,400 new homes;
  - Safeguard Wood Green's Metropolitan town centre status, by enabling an expansion of town centre floorspace and uses, particularly for comparison retail, expanded and enhanced leisure, and the creation of an improved evening economy;
  - Enhance Haringey's economy through new floorspace for office and creative industries;
  - Enable a range of urban realm improvements including the creation of a new town square to provide the central focus of community life in Wood Green;
  - Optimise the use of Council-owned land to provide a catalyst for wider regeneration and to facilitate comprehensive development;



- Secure enhanced east-west and north-south connections through the centre, making it more accessible and pedestrian friendly;
- Co-ordinate new infrastructure in the regenerated town centre, to support the area's increasing population;
- Establish a set of Wood Green specific planning policies to ensure the right type of development comes forwards in the right locations to achieve the community's aspirations for the future of Wood Green.
- 4.7 It was anticipated that Government would make a positive announcement about supporting Crossrail 2 in the last year. Unfortunately, neither the 2017 Conservative manifesto or successive budget statements have provided any certainty that Crossrail 2 will be funded. As a result, it is not possible or appropriate for the AAP to rely on the increased transport capacity that Crossrail 2 would provide that in turn would allow for increased development densities.
- 4.8 Since the growth assumptions (both the amount and mix of development proposed) in the previous 'preferred option' draft were predicated on the provision of Crossrail 2 serving the Wood Green area, it is not possible to progress to a Pre-submission (Regulation 19) version of the AAP without further consulting the community on the consequences for the Plan of not relying upon this strategic transport improvement. To do so would risk the AAP being found 'unsound' at the examination in public stage, resulting in reputational harm and significant delay and additional costs in bring forward this much needed planning framework. For these reasons, a further 'preferred option' round of consultation is necessary.
- 4.9 Wood Green has a number of strategic brownfield and regeneration sites and prime town centre redevelopment sites, offering significant potential for new jobs and homes, a better choice of retail and leisure and better east west connectivity.

#### 5 Alternative options considered

- As set out in Section 4 above, it is not possible to progress straight to a Presubmission (Regulation 19) version of the Wood Green AAP based on the 2017 'preferred option' draft for the reasons outlined. This option is therefore dismissed.
- 5.2 An alternative option is to rely on the existing Local Plan to manage growth and change in Wood Green, in preference to preparing an AAP for the area. This option would see implementation of the proposals already set out in the Site Allocations DPD, which allocates the majority of development sites proposed in the AAP, making provision for 4,300 net additional homes. However, these site allocations in themselves do not provide the overarching framework needed to



secure coordinated improvements and regeneration benefits across the wider Wood Green area. In this respect, initial consultation on the Wood Green AAP - the 2016 Issues & Options consultation - elicited significant public support for a high level of intervention and significant growth where this would secure a rejuvenated High Street, with a better shopping offer and improved pedestrian connections, more housing, including affordable homes, and greater local job opportunities. Given development in accordance with the existing site allocations are unlikely to deliver the community's aspirations for the future of Wood Green, this option is not preferred.

5.3 The vision and objectives for Wood Green have evolved since 2014 as the programme has progressed. The previous draft of the AAP (January 2017 Regulation 18) contained a vision and objectives relating to spatial regeneration policies, though much of the response to the consultation related to the existing communities who would be directly impacted by the proposals.

## 6 Background information

## Comments received to the 2017 Preferred Option AAP

- 6.1 The previous preferred option (Regulation 18) version of the Wood Green AAP was published for public consultation between January and March 2017. Over the course of the 10-week consultation period, Public Voice (specialist consultation consultants) and the Council:
  - Held 11 exhibitions of the plans in public places around Wood Green;
  - Ran 9 workshops with different sections of the community to discuss the plans in more detail;
  - Knocked on the doors of all homes that were proposed to be allocated for redevelopment in the proposed AAP (and so would be affected by the proposals), and spoke directly to 180 residents and left information with all of these;
  - Set up a consultation website where people could read about the plans and leave comments;
  - Advertised the consultation on posters along the High Road, through emails to relevant contacts, on social media and in local press;
  - Sent newsletters to over 18,000 addresses in Wood Green to notify them about the consultation;
  - Sent notification letters to local residents, businesses and interest groups, including over 800 people who took part in the previous round of consultation in 2016 and to all organisations and individuals (c.1,500) on the Local Plan consultation database:
  - Held 14 1:1 meetings with local businesses, residents, interest groups and statutory agencies;
  - Advertised the consultation on the Council's website;



- Made copies of the AAP available to view in all local libraries, at the Civic Centre, the Planning Office, and online; and
- Placed an advert in the Haringey Independent
- 6.2 We listened to the views of people who live in and around Wood Green, people who go there to do their shopping, people who work or run businesses there, and people who visit for other reasons. We also heard from local landowners, and local and national statutory bodies. Over 1,000 people and organisations provided feedback on the plans for Wood Green, and more than 6,500 people viewed the consultation material online or at an event or public exhibition of the plans.
- 6.3 The following provides a summary of the comments received. Appendix A provides the full consultation report, which includes all the comments received and the Council's draft response to these. This will be finalised and published alongside consultation on the revised draft AAP, so that respondents can understand how the Council has considered their comments and, where appropriate, how these have been addressed in the revised draft.
- 6.4 The topics that attracted the highest number of comments during the consultation were:
  - The impact of traffic on Wightman Road and the Harringay Ladder –
     93 comments
  - Opposition to demolishing the Victorian terraced homes on Caxton,
     Mayes, and Coburg Roads 54 comments
  - The need for a new swimming pool and leisure centre in Wood Green
     38 comments (plus two separate petitions with a combined 1,402 signatures)
  - The desire to see a better choice of shops, cafes and restaurants in the town centre 37 comments
  - Concerns about the level of new affordable housing that would be built as part of the regeneration 36 comments
- 6.5 The most commented upon Site Allocations were:
- WGSA9 Wood Green Town Centre West (107 comments) a large number of people objected to proposals to demolish Victorian homes on Caxton, Coburg and Mayes Roads, while others expressed concerns about how the rights of affected social housing tenants living above the Mall would be guaranteed
- WGSA10 The Mall (East) (52 comments) similar concerns were expressed
  about the rights of residents currently living above the Mall, if this were to be
  demolished, and where the current Market Hall traders would be relocated to.
  Several people made suggestions for refurbishing the Mall, and there was a desire
  to see at least one cinema remain in the centre of Wood Green
- WGSA25 Hornsey Filter Beds (40 comments) many people objected to building housing on this site, which is designated as Metropolitan Open Land (similar to green belt), with some people feeling it should be preserved for wildlife



- WGSA8 Wood Green Library (31 comments) some people objected to plans
  to demolish the library, instead arguing for it to be refurbished or extended, while
  others wanted to see a replacement library built either on the same site or in an
  equally accessible location
- WGSA12 Bury Road Car Park (24 comments) similar concerns were expressed about the rights of social housing residents living in the flats above the car park, though there was also some support for demolishing it to make better use of the space

# Key changes between the previous and revised 'Preferred Option' versions

6.6 The main difference between the previous 2017 'Preferred Option' AAP and the revised version, is the fact that the site development capacities have no regard to the potential for the provision of Crossrail 2 serving Wood Green. This has implications for both amount and mix of development planned for on each of the strategic sites and, cumulatively, for Wood Green as a whole. The latter is summarised in the table below, whilst the changes to the individual development sites is set out in the table at Appendix B.

	Site Allocations DPD	2017 Preferred Option AAP	Revised Preferred Option AAP
Proposal sites	20	25	28
Residential	4,300	7,701	6,409
Employment Floorspace	46,291	101,940	98,265
Town Centre Floorspace	17,217	71,762	57,570
Strategic Infrastructure	CR2 Not confirmed	Crossrail 2	CR2 Not confirmed

- 6.7 In response to the comments received, as well as further evidence base studies; the following changes are proposed to the policies and/or sites within the revised AAP:
  - To exclude the Victorian homes around Caxton and Mayes roads from inclusion within the site allocation for The Mall;
  - Further clarity on the proposed route for the enhanced pedestrian connection between the High Street and Penstock Tunnel;
  - To recognise that proposals to increase and diversify the evening economy will need to manage potential negative impacts;
  - That the current quantity of convenience retail provision within Wood Green should be retained at current levels, as a minimum;
  - To include reference to the Council's recently updated and adopted Estate Renewal, Re-housing and Payments Policy, which strengthens our commitment to tenants and leaseholders on estate renewal sites, and extending the offer to residents on estates which may not be in the Council's ownership, but are affected by regeneration initiatives; and



 To signal further support for further investment, improvements and development within and around Turnpike Lane, beyond that already planned for through the AAP.

#### Not changing in the revised AAP

6.8 With the exception of the overall quantums of development being proposed, the vision and strategic objectives are to remain largely unchanged, as follows:

#### Vision: AAP Area

Wood Green will be north London's most liveable town centre. It will combine outstanding places to shop and socialise with a wide range of creative and prosperous businesses and be an attractive destination and a focus for opportunity and growth.

## **Spatial Objectives: AAP Area**

- 1. A bigger Metropolitan Town Centre with more employment space, delivering 4,000 new jobs;
- 2. A well-connected, lively destination which draws people from Haringey and beyond;
- 3. 6,000+ new homes of varying rents and values in high quality, low carbon neighbourhoods;
- 4. Maximise opportunities for local residents through education, training, skills, employment;
- 5. Celebrate and build on Wood Green's heritage so people are proud of their diverse communities;
- 6. Secure investment in social and community infrastructure, including parks and a new library:
- 7. A place where new businesses will set up, existing ones will grow and people will be proud to live;
- 8. Make Wood Green a destination of choice, with a strong cultural offer both day and night;
- 9. An accessible urban environment with welcoming spaces where people enjoy spending time.
- 6.9 Other aspects of the plan that remain unchanged:
  - The employment-led focus of the plan;
  - The expectation of high density development, including taller and tall buildings, making the most of the excellent transport connectivity, the regional metropolitan town centre designation, and the provision of local services and amenities;
  - The intention to grow and diversify the retail offer, role and function of the town centre, ensuring it continues to attract national retailers and subregional trade, as well as opportunities to retain and support local



- enterprise, and remains flexible and resilient to changing economic and sectoral circumstances:
- The target of 40% of new housing to be affordable homes to be split 60% affordable rented and 40% intermediate, according with the borough-wide target; it should be noted that, in line with the Council's adopted Housing Strategy, that affordable rents will be secured at a maximum of up tp 45% of local market rents for 4 bed units, 55% for 3 bed units, 65% for 2 bed units and 80% for 1 bed units. For intermediate provision the Council's preference is for lower cost shared ownership products to be delivered to households on gross incomes of less than £40K, however recognising the need to provide some opportunities for those on income bands in excess of this threshold.
- The improvements to local connections, in particular by foot, bike and public transport, and the presumption against further car parking with the exception of disabled parking;
- The enhancements to the environment and public realm, including the creation of a new public square away from the traffic and hustle and bustle of the High Street;
- That there is not the opportunity to create large areas of new open space and therefore there is a priority to improve connections to, and the quality & useability of, existing open space assets, including Alexandra Park via the Penstock Tunnel;
- There is unlikely to be dramatic improvements to the accessibility of Wood Green and Turnpike Lane tube stations;
- The intention to redevelop the Civic Centre and Wood Green Library and to relocate the Council's office to a new site to the west of the High Street; and
- To progress with the proposal to develop the Hornsey Filter Beds site, where this secures direct public access between the western end of Penstock Tunnel and Alexandra Park.

#### Relationship with the Wood Green Strategic Regeneration Framework

6.10 Also being reported to January Cabinet is the Strategic Regeneration Framework (SRF) for Wood Green. The intention is that the AAP will provide a statutory land-use basis for determining planning applications, while the SRF will address the AAP's implementation. The latter includes the coordination of marketing and place making initiatives, securing economic outcomes, managing ongoing community engagement and, where necessary, more strategic land and property interventions, such as acquisitions and land assembly. Importantly, the SRF will also set out how the Council intends to manage



requirements for relocations and decanting, as well as construction management, ensuring the town centre continues to function, and residents are not significantly impacted by construction activities. The SRF is included at Appendix C.

# Relationship with the Wood Green Development Infrastructure Investment Framework

6.11 This portfolio of work will co-ordinate infrastructure investment and provision over the plan period to 2031 and beyond, including phasing triggers for when new provision is required, liaison with service providers and user groups, and, where necessary, commissioning specific works. The aim is to provide clarity and certainty to landowners, developers, service providers and the community about how places and sites within the Wood Green AAP area will develop, and against which infrastructure investment decisions can be made and development proposals can be assessed.

## **Revoking the Haringey Heartlands Development Framework**

6.12 The Haringey Heartlands Development Framework was adopted by the Council in 2005 as supplementary guidance. It is significantly out of date, with the vast majority of the guidance being superseded by the adoption of the Site Allocations DPD and Development Management Policies DPD in July 2017. To avoid potential for any conflict or confusion over the current policy position of the current Local Plan and the Haringey Heartlands Development Framework, as applicable to site within and outside of the Wood Green AAP area, it is recommended that this supplementary guidance be formally revoked. This will also ensure the proposals within the emerging Wood Green AAP are compared only to the relevant extant policy position set out in the recently adopted Local Plan documents.

#### Consultation

- 6.13 The purpose of the consultation and engagement to take place in January to March 2018 is to help to affected parties and interested bodies understand the key changes set out in the revised 'Preferred Option' AAP and to also support the wider regeneration programme by building and maintaining relationships with stakeholders, promoting an open and accessible process and identifying issues and opportunities which are important to the community but which may sit outside of the spatial planning policy remit.
- 6.14 Specific engagement is planned with developers and institutional investors with interests on larger land parcels. The Council has been working with these parties through pre-application discussions as well as the Wood Green Advisory Board, to ensure the emerging aspirations for Wood Green are clearly understood. However, it is appreciated that the revised 'Preferred Option'



reduces the development potential of most of the strategic sites and alters the development mix, and therefore will require these parties to reaffirm their agreement to the new figures and proposals, as well as to the Investment Framework.

- 6.15 More generally, the outcome of the consultation events will be that communities in Wood Green and Haringey are:
  - well informed about the current regeneration plans for Wood Green
  - well informed about projects which are already in the development pipeline
  - engaged with the statutory consultation process on the Draft AAP
  - given a voice on investment priorities in place-making and infrastructure investment
- 6.16 At the end of the consultation period a meaningful and representative number of stakeholders will have participated in the statutory consultation on the AAP Draft Preferred Option. The council will also have a more developed understanding of community priorities for place-making and social and community infrastructure which will inform decisions on funding and phasing.

#### **Approach**

- 6.17 The revised 'Preferred Option' AAP will be made available on the Council's website and in locations around Wood Green for the six-week consultation period. During this time all stakeholders will be invited to make comments on the option by letter, email or by filling in a feedback form. There will be a series of activities (see 6.23 for details) during this period to allow stakeholders to understand and discuss the proposed AAP policies and also the opportunities and constraints around delivery, funding and phasing.
- 6.18 At the close of the consultation and engagement period all comments will be collated into a report and published on the Council's website. The Council will then consider the consultation findings and this will influence the final Pre-Submission version of the AAP and the final the Investment Framework.

# Before the consultation commences:

Communication setting out what/ why/ where of the proposed consultation and engagement would only commence after a positive decision at Regulatory Committee and Cabinet.

At least 10 days (including two weekends) notice would be given for public events and meetings by:

- Public notices in the local press
- Notification emails/ letters to consultees on the Planning Service database and Wood Green Regeneration database
- Notification letter to directly affected parties (i.e. owners and occupiers of buildings and land with proposed site allocations)
- Site notices for site allocations



	<ul> <li>Notification via Council's online support media such as blogs and social networks</li> <li>Flyer drop to all households and businesses in consultation area</li> <li>Posters in shop windows and community hubs</li> </ul>
During the consultation:	<ul> <li>Plans and supporting information will be published on the Council's website</li> <li>Plans and supporting information will be made available to view in local library and community centres</li> <li>Public road show and drop in sessions at different locations in consultation area</li> <li>Presentations/ discussion at meetings of stakeholders and interested party's forums</li> <li>Walk abouts/ cycle trips – open to all – to discuss specific areas</li> <li>Door to door conversations with directly affected parties (i.e. owners and occupiers of buildings and land with proposed site allocations)</li> <li>A free-phone service will be available</li> </ul>
After the consultation ends:	<ul> <li>A report setting out who was consulted, how they were consulted and a summary of the main issues raised will be published on the council's website within 4 weeks</li> <li>A report setting out how the comments have been taken into account in the revised documents will be published at the same time as the next draft of the document</li> </ul>

#### **Timeframes**

6.19 As stated above, consultation on the revised AAP is programmed to take place over January through March 2018. Following the conclusion of the consultation, all responses will be analysed and responded to. Where appropriate, changes will be made to the document. The revised 'Pre-Submission' version of the plan will then be consulted on for a period of 6 weeks prior to being submitted to the Planning Inspectorate for Examination in Public. The Pre-Submission consultation and Examination deal primarily with issues of soundness and legality, and is therefore much more formal. Dates for these next steps are:

Meeting/ Milestone	Date	
Regulatory Committee	8 <sup>th</sup> January	
Cabinet Meeting	16 <sup>th</sup> January	
Consultation on revised Preferred Option	Jan-March 2018	
Full Council to approve Proposed	Summer 2018	
Submission version		
Proposed Submission consultation	Summer 2018	
Examination in Public	Autumn 2018	
Adoption	January 2019	

# 7 Contribution to strategic outcomes



- 7.1 Priority 4: Drive Growth from which everyone can benefit. By producing this document, the Council is sending a clear message that Wood Green is ready to receive investment that yields new employment floorspace, securing more, and a wider range of jobs, including in an expanded retail sector. Additionally, by prioritising local access to new jobs through construction schemes, new opportunities will be created for local residents to increase their skills within the construction sector. By planning for growth, the infrastructure requirements of new development will be planned for, and new development will be located and oriented in such a way to optimise delivery and access to new facilities for existing and new residents.
- 7.2 Priority 5: Create homes and communities where people choose to live and are able to thrive. The AAP creates a policy framework for the delivery of 6,400 new homes in the Wood Green area, as well as an enhancement of Wood Green Metropolitan Town Centre, which together will create an enhanced Wood Green in which local residents are proud to live, with excellent access to local services and jobs.

# 8 Statutory Officers comments (Chief Finance Officer (including procurement), Assistant Director of Corporate Governance, Equalities)

#### **Finance and Procurement**

- 8.1 Once adopted, the Wood Green AAP determines how planning applications will be assessed. The Council has a statutory duty to consult on the plan and the cost of this consultation will be met from existing Planning revenue budgets.
- 8.2 The AAP identifies the potential for 6,400 new homes (an increase of 3,400 from existing plans),as well as increased employment floorspace and 4,000 new jobs. These increases from the current assumptions in the Local Plan would lead to increased demand for Council services and increased council tax and business rates revenue. There is also potential income from Community Infrastructure Levy on the new development which will help to fund changes in infrastructure needs.
- 8.3 The Council is also preparing the Wood Green Investment Framework which is the framework to deliver the AAP, co-ordinate other plans, projects and investments in the Wood Green area.
- 8.4 There will be a requirement for the Council to commit resources to the wider regeneration of Wood Green at some point in the future. At this stage it is not possible to be definite about the overall quantum of the investment required as the AAP is to be consulted upon and the results of that are by definition unknown at this stage.



8.5 However, once the consultation has been concluded and a recommendations promulgated, these will be costed and the investment requirement made clear. It will then be for members to decide whether the investment should be made.

#### Legal

- 8.6 The Assistant Director of Corporate Governance has been consulted on the preparation of this report, and makes the following comments:
- 8.7 Regulation 5 of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ("the Regulations") identifies as a local development document any planning document which relates to a part of the area of a local planning authority, identifies that area as an area of significant change or special conservation and contains the authority's policies in relation to that area. Such a document forms part of the local plan in accordance with which planning applications must be determined unless material considerations indicate otherwise. It must, therefore, be adopted in accordance with the procedure set out in the Regulations, comprising statutory pre-submission public consultation, consideration of representations received during the consultation, submission to the Secretary of State, public examination, revision to account for the recommendations from public examination (if necessary), and adoption by full Council.
- 8.8 Section 19(2) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that the local planning authority in preparing a Local Development Document such as an Area Action Plan must have regard to, amongst other considerations, national policies, the London Plan and advice in guidance issued by the Secretary of State and other requirements (if applicable) set out in the Regulations, such as local transport policies. The AAP must be in general conformity with the London Plan.
- 8.9 The National Planning Policy Framework ("NPPF") states that a local planning authority should produce a single local plan for its area and that any additional development plan documents (such as the AAP) should only be used where clearly justified.
- 8.10 The NPPF also states that early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses to be essential, and that each local development document should be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. The local plan should also be based upon and reflect the NPPF's presumption in favour of sustainable development, which should be done by identifying and providing for objectively assessed needs and showing how the presumption will be applied.



- 8.11 The NPPF holds that in order for a plan to be considered "sound" so that it may be recommended for adoption it should be:
  - Positively prepared
  - Justified
  - Effective
  - Consistent with national policy
- 8.12 The AAP must be accompanied by a sustainability appraisal incorporating a strategic environmental assessment.
- 8.13 The Council will have to ensure it works proactively with other authorities on any strategic cross boundary issues as per the duty to co-operate.
- 8.14 The consultation must be carried in accordance with the Regulations and the Council's statement of community involvement.

#### **Equalities**

- 8.15 The Council has a Public Sector Equality Duty under the Equality Act (2010) to have due regard to the need to:
  - Eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
  - Advance equality of opportunity between people who share those protected characteristics and those people who do not
  - Foster good relations between people who share those characteristics and people who do not.

The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status applies to the first part of the duty.

- 8.16 The decision to adopt an Area Action Plan (AAP) for Wood Green as planning policy will have a significant impact on both current and future residents of the area outlined. It will enable a series of further decisions to be brought forward on the redevelopment of the existing town centre and surrounding sites in the affected wards. We expect the long term regeneration of Wood Green to be positive overall for all residents and this decision partially enables that to take place. The Wood Green Strategic Regeneration Framework (SRF) outlines this vision for social and economic improvements for residents.
- 8.17 However the regeneration process will impact on residents and businesses living and operating in AAP area, with the potential for inadvertent, negative impacts on some groups. To prevent this we have been proactive in consulting with a wide and diverse range of people and stakeholders on the preferred option Wood Green Area Action Plan. This decision represents the next stage



in that process, incorporating feedback from residents and businesses into a revised version of the preferred option. This process is ensuring that groups who are disproportionately impacted by the eventual decision are identified, necessary changes made, and appropriate mitigating actions put in place, ahead of the final decision on adopting the AAP. The results of this process will be outlined in a full Equalities Impact Assessment (EqIA), developed during this consultation process and finalised before the preferred option for the AAP is taken forward.

- 8.18 The EqIA for the Wood Green SRF outlines the existing inequalities for current residents in the area of the AAP and should inform this decision to further consult on the revised AAP. Both documents will support the Council to address and reduce these existing inequalities should they proceed.
- 8.19 EqIAs for both the overall AAP and specific components of the plans will be carried out alongside this consultation process and delivered before the AAP document is finalised. This will inform the final Cabinet decision on whether to adopt the Wood Green AAP. The EqIAs will primarily focus on the following issues:
  - The relocation of people and businesses should the proposal to redevelop the Mall proceed. An EqIA will identify the groups affected, their views expressed during the consultation process, and outline measures for mitigating any disproportionate or negative impacts.
  - How the overall Area Action Plan is expected to impact on different groups living and working in the Wood Green area, covering physical accessibility and the environment, the sufficiency of community infrastructure, employment opportunities and the housing mix.

#### 9 Appendices

**Appendix A -** Wood Green AAP 2017 Preferred Option consultation report.

**Appendix B -** Wood Green Area Action Plan Preferred Option (2018 Version) draft document

Appendix C - Wood Green SRF

**Appendix D –** Draft Wood Green Three Year Delivery Plan

**Appendix E** – Equality Impact Assessment

#### 10. Local Government (Access to Information) Act 1985

- a. Local Plan: Strategic Policies (2013)
- b. Alterations to the Local Plan: Strategic Policies DPD (Proposed Submission Version, 2016)



- c. Local Plan: Development Management Polices DPD (Proposed Submission version, 2016)
- d. Local Plan: Site Allocations DPD (Proposed Submission version, 2016)
- e. Statement of Community Involvement (2013)

All documents are available at <a href="http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework">http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework</a>

