

It is therefore incorrect to state that performance at these schools is at or above the national average, reflecting significant improvements in recent years.

Suggested changes and revised wording:

The paragraph should be changed to state that for the three schools in question, two are significantly below the England average, and the third is above in one dimension (Level 4) but below in another dimension (Level 5). All three schools had declining results between 2008 and 2009, and in one of the schools performance was lower in 2009 than in 2006.

An alternative would be to remove all the text concerning the schools. The policy regarding school education in Northumberland Park may need to be revisited.

32 Issue/topic: Seven Sisters Corridor

Page Number: 72

Paragraph Number: 3.1.35

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph has no meaning as currently written.

Suggested changes and revised wording:

Delete the paragraph.

10/23/31
493.

33 Issue/topic: Aspirations for the (Seven Sisters) Area

Page Number: 74

Paragraph Number: Bullet 3 – landmarks and legibility

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

10/25/14
4/24/13-1

Reasons for Not Compliant or Unsound:

This bullet point seems directed towards Wards Corner, a site whose proposed development is contentious. The point is unsound because there has been massive opposition to it. No justification is given for rejecting the wishes of the local community

Policy must recognise sites that are in a Conservation Area and of historic significance to the entire High Road. New development must be appropriate in that context, and serve to strengthen the local community.

Legibility is not an issue because of the number of existing buildings of good quality on the High Road.

Suggested changes and revised wording:

Revised text for Bullet 3:

“The development of opportunity sites will match the quality of the best buildings in the Conservation Area, which gives the area its legibility.”

34 Issue/topic: Aspirations for the (Seven Sisters) Area

Page Number: 74

Paragraph Number: Bullet 8 – Apex House

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Apex House is a relatively new development, undertaken by the Local Authority itself, and designed purposely as a “Landmark Building” and “Gateway” to Seven Sisters.

The quality of the architecture is debatable but it would be wasteful and unsustainable to demolish it.

Suggested changes and revised wording:

Delete Bullet 8 – Apex House

35 Issue/topic: Areas of limited change

Page Number: 75

Paragraph Number: 3.1.41

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

NO
NOT Justified

10/2624/25/3.1

Reasons for Not Compliant or Unsound:

Haringey as a whole is residential in character. Conservation Areas and heritage exists in both the east and west of the Borough – there are 10 CAs in the west and 17 CAs in the centre and east of the Borough (UDP 2006, Schedule 12).

Promotion of high quality places and conservation of heritage should take place wherever it occurs all over the Borough.

The obligation of development to respect the character of the surrounding areas should apply to all of the Borough and not just to the west of the Borough or ‘areas of limited change’

Suggested changes and revised wording:

Revisions for 3.1.42:

Delete “particularly in the west of the borough” and example areas Crouch End etc.

New text:

“Significant areas of these are designated as CAs, of which there are 24 in the Borough, and will have development over the next 15 years.”

36 **Issue/topic:** SP1 Indicators of delivery

Page Number:

77

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

NOT Effective

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The table of indicators for the success of SP1 does not include any indicator for new jobs generations, and in particular, no indicator for non-retail new jobs generation. Policies aimed at managing growth must have indicators and measures on increased employment.

Suggested changes and revised wording:

Add an indicator for net new jobs generation.

37 Issue/topic: SP1 Indicators of delivery

Page Number: 77

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Handwritten: 31.4/27/0.1

Reasons for Not Compliant or Unsound:

The table of indicators for the success of SP1 does not include any indicator or assessment for how well the character of the various development areas has been protected. In particular an assessment is needed of how the Conservation Areas and Heritage in and adjacent to the Areas of Change have been protected and enhanced after development.

Suggested changes and revised wording:

Add an indicator or assessment of how well character and heritage has been protected and enhanced after development.

38 Issue/topic: Housing

Page Number: 79

Paragraph Number:

Policy Number: SP2

Objective Number: Bullet 1 – density levels

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

SP2 Bullet 1 states that new development will meet the density levels set out in the Density Matrix in the London Plan (Table 3A.2).

The density matrix defines the context of an area for density purposes as either central, urban or suburban. Much of Haringey is suburban (Haringey Core Strategy paragraph 6.1.15, page 141) but some areas are not.

The Inspector for the UDP 2006 Public Enquiry on the application of the London Plan Matrix recommended in his report (paragraph 4.186) that: “The Central, Urban and Suburban areas of Haringey should be defined” and “identified in a reasoned justification and shown clearly on an accompanying map”.

The Central, Urban and Suburban area contexts have not been defined in Haringey, no justification has been offered for them, and they are not shown clearly on a map.

Suggested changes and revised wording:

The Inspector’s report UDP 2006 should be followed: The main area contexts of Haringey should be identified, justified and shown clearly on a map.

39 Issue/topic: Conversions

Page Number: 83
Paragraph Number: 3.2.13
Policy Number:
Objective Number:

10/23, 4/29/02

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph 3.2.13 states that the Council will resist conversions in a limited set of circumstances. The Haringey Housing SPD 2008 and UDP 2006 explicitly goes further in resisting conversions. The Housing SPD in particular:

“9.3 The Council has identified areas of the borough which already have a high number of converted properties. Further conversions and HMOs will be resisted for the reasons set out in paragraph 9.1. “

and

“9.4 In addition, the Council will normally resist applications for conversions and HMOs in streets where conversions and/or HMOs already equal 20% of the properties.”

The Core Strategy offers no justification for not including these points or equivalent text in the paragraph. These points are from a very recent planning document, thoroughly consulted upon, carried out to the latest LDF format, and adopted by the Council.

In addition, conversions have a negative impact on the area as a whole, not least because of issues of inadequate and intermittent maintenance, and transience of the population. Excessive conversions also reduce the supply/ access to three/ four bedroom houses, the type of property most needed in the borough.

Suggested changes and revised wording:

Add equivalent text to Housing SPD 2008 paras 9.3 and 9.4 into this paragraph.

40 Issue/topic: Family Housing

Page Number: 83

Paragraph Number: 3.2.16

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

HOUSE EXTENSIONS IN SOUTH TOTTENHAM SPD.

~~10332~~ 4/3/22 ↑

INTERIM GUIDANCE FOR DM. GOING TO CABINET IN OCTOBER.

NO
NOT Justified

Reasons for Not Compliant or Unsound:

The first sentence of this paragraph identifies "particular communities" that have special housing requirements.

Planning standards should be the same for the whole Borough. The idea that "particular communities" should be favoured over others, or have planning policies tailored to their benefit over others is divisive and discriminatory. What does have the Council have in mind here ?

The second sentence refers to a shortfall in suitable accommodation. Does this shortfall also refer to the first sentence or is it a separate point ? There is clearly a social housing need for people inadequately housed in the Borough.

If the first sentence is not connected to the second sentence then the implication is that there will be special development control policies for certain private developers, which is inappropriate.

Suggested changes and revised wording:

Revised text for 3.2.16:

"There is an acute need for suitable accommodation for families in the Borough, which are on the Council list. Responding to this shortfall is a priority for the Council."

41 **Issue/topic:** Affordable Housing

Page Number: 83

Paragraph Number: 3.2.17

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Core Strategy does not indicate a target for affordable housing, either in aggregate or by size of dwelling. It is not possible for the likely effectiveness of the proposed policies to be assessed without such estimates of what is achievable. The London Plan Policy 3A.9 requires DPDs to have such targets. This omission cannot be justified.

Suggested changes and revised wording:

The Core Strategy to give indicative targets for affordable housing by size of dwelling as a result of the proposed policies.

10834
4/31/22

42 **Issue/topic:** Affordable Housing

Page Number: 84

Paragraph Number: 3.1.20

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Council anticipates applying the 50% affordable housing to a 5 dwelling threshold. Apart from the practical issue of 50% of 5 being 2.5, and what can be done with half a unit, there are issues concerning the practicality of the economics for private developers. It is not clear that the land value is sufficient to support 50% affordable housing at such a low dwelling threshold.

A side effect of this policy may be to choke off the redevelopment of small sites. This would perpetuate gaps in the streetscape and lead to inappropriate short term uses, such as car washes. The end result may lead to housing blight, an intensification of deprivation and serve to lower land values further.

The London Plan policy for 50% affordable housing has a nominal threshold of 10 dwellings (Policy 3A.11). The Council has not provided any economic modelling or other justification in support of its contention that land values in Haringey can support a 5 dwelling threshold.

Given the importance of this issue, and the possibility of unfortunate side effects, and the lack of supporting justification as to its economic viability, the 5 dwelling threshold should be regarded as unsound and unjustified.

Suggested changes and revised wording:

Council to provide economic data to show that land values in Haringey can support a 5 dwelling threshold, or revert to the existing 10 dwelling threshold.

43 Issue/topic: Affordable Housing

Page Number: 84

Paragraph Number: 3.2.23

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph allows developers to social engineer their sites by placing their affordable housing obligation in a separate location to the market units. This undermines policies geared at creating mixed communities, and undermines the Council's own Community Strategy.

The Council offers no justification for this policy, and it is unclear what is trying to be achieved. It can only benefit the narrow interests of the developer and not the community as a whole.

It should also be noted that this paragraph directly contradicts the Core Strategy policy in para 3.2.25.

Suggested changes and revised wording:

Delete paragraph 3.2.23

10 2364/33/22

44 Issue/topic: Affordable Housing

Page Number: 85

Paragraph Number: 3.2.24

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph asserts that the Council recognises the need to 'change the character of housing provision' for older people.

It is not clear what this means. To build more care homes? To build fewer care homes?

Suggested changes and revised wording:

Paragraph to be expanded to explain what is meant, so that it can be commented upon.

4/34/22.
10 3/37

45 Issue/topic: Climate Change in Haringey

Page Number: 92

Paragraph Number: 4.1.5

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph asserts that minimising car parking reduces the number of car journeys. This policy has been in effect long enough (5 to 10 years) for the impact of this measure to be assessed.

Maximum residential car parking standards do have negative effects. Residents in car free or car reduced developments often still have a car, they simply park it in a non-CPZ street, or they are given a CPZ permit to park in a CPZ street. Car parking pressure and stress in residential streets is thus increased with absolutely no reduction in car travel.

The fact is, car journeys and traffic trips are rising inexorably throughout the Borough and this needs to be addressed by other policy. It is appropriate for the Council to undertake research so as to justify continuing with car free and care reduced developments and to justify continuing to create disbenefits for other residents. If the policy does not work, it should be abandoned.

Suggested changes and revised wording:

Revise policy further to research.

10/339. 4/35/4.1.

46 Issue/topic: Climate Change in Haringey

Page Number: 92

Paragraph Number: 4.1.7

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Council does not discuss how pointless redevelopment can be controlled. The largest carbon burden occurs in the erection of a building and use of new materials. The Council's pro-growth agenda does not include an assessment of whether a building can be recycled and re-used rather than the site being redeveloped.

The use of "we" in the last sentence is ambiguous. If it refers to the Council, it is acceptable, if it refers to residents it is (a) objectionable and (b) beyond the Council's powers.

Suggested changes and revised wording:

Revised text: change "we do" to "it does"

10
~~3454~~ / 36 / 4.1

47 Issue/topic: Climate Change in Haringey

Page Number: 93

Paragraph Number: 4.1.8

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Given that most energy is consumed in heating houses, and given the nature of the majority of Haringey's housing stock, it is not credible that a 40% reduction in CO2 emission from 2005 by 2020 is possible.

The following reference indicates the limits to improving the energy efficiency of older houses. Sustainable Energy Without the Hot Air, David JC MacKay, 2008, available free online at www.withouthotair.com

Addressing climate change requires realism. The Council should start here and put forward realistic carbon reduction targets, targets without the hot air shall we say.

Suggested changes and revised wording:

Council to put forward deliverable carbon reduction targets.

10/346 4/37/4.1

48 Issue/topic: Decentralised energy

Page Number: 94

Paragraph Number: 4.1.15

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

It is not clear that local CHP schemes are the best way to heat buildings and generate electricity using natural gas (cf Sustainable Energy Without the Hot Air, page 151, David JC MacKay, 2008, available free online at www.withouthotair.com) The issue is complex, and the Council should be wary of enshrining suboptimal solutions in policy.

Suggested changes and revised wording:

10
30/4.1

49 Issue/topic: Existing Housing Stock

Page Number: 97

Paragraph Number: 4.1.23

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text claims that much of the housing today will be in use in 2026. This is incorrect. Practically all the housing standing today will be in use in 2026.

Suggested changes and revised wording:

Revised text: "Practically all the housing standing today will be in use in 2026"

10/348 4/34/24.1

50 Issue/topic: Indicators for policies 4,5,6

Page Number: 104

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title: Indicators to monitor delivery

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

An obvious monitoring target should be the number of tonnes of CO2 saved or CO2 consumption foregone by these policies.

Suggested changes and revised wording:

A target for the number of tonnes of CO2 saved or CO2 consumption foregone should be added.

10 3/19 4/40/4.3

51 Issue/topic: Public transport

Page Number: 108

Paragraph Number: 4.4.8

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The key objectives in this paragraph make no mention of reducing traffic volumes, limiting Heavy Goods Vehicles in residential streets, controlling traffic speeding and limiting traffic noise and vibration.

These traffic issues are one of the most consistent and major issues facing residents.

The problem is exacerbated by planning decisions for retail sites that do not recognise the issue of proper access routes for resupplying the outlets in these retail sites. The end result is Heavy Goods Vehicles plying our residential streets at all hours of the day and night, and gradually shaking our houses to bits.

Small improvements such as the surfacing of roads with quiet surface treatments would lessen the effects of noise and vibration.

The Borough could do much in terms of land use policies to address this issue, but chooses to do little.

Suggested changes and revised wording:

Additional text:

“Limiting Heavy Goods Vehicles usage in local streets and minimising the impacts of traffic noise and vibration”

52 Issue/topic: Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The relationship of the housing policy SP2 does not cohere with the employment objectives, and policy SP8 would therefore be ineffective. The need is to increase employment yet this policy focussed solely on "employment land", here interpreted as "industrial". The only "safeguarded" sites are "industrial sites". The policy and reasoning set forward in page 120 neglects entirely

- a) support of home working
- b) creation of Hubs e.g. the Hub at Kings Cross
- c) encouragement to firms to relocate in Haringey to benefit from a workforce which has to commute to find employment

The policy is lacking in ambition for the borough. The evidence base is lacking; para 5.1.14 states 61,000 jobs (2006) but this figure excludes the self-employed. To not take account of the self-employed is a significant flaw for obvious reasons. It is from that group that new businesses are likely to be founded and grow. The authority does not even have a raw statistic in the plan. How can regeneration be supported if the likely source of initiatives is not understood or related to?

Suggested changes and revised wording:

Revise the policy to take into account the self-employed and home workers and to support initiatives to enable the employment base to be extended and expanded.

53 Issue/topic: Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 1 – Protect B uses ...

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This policy is inadequate: all employment land should be protected. This policy gives the impression that only "B" uses are protected. Any employment land/use which goes out of employment to housing will never revert – there is a ratchet effect. Given the overriding need to create a sustainable future, Haringey must cease to be a dormitory suburb for commuters and the possibility of working closer to home or at home should be made possible.

Suggested changes and revised wording:

Revise text to state that all employment land will be protected.

10 892 (42)
4/42/5.1

54 Issue/topic: Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 2 – Support local employment and regeneration aims

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The LA can hardly support regeneration aims if it has no up to date knowledge of the skills based in the borough and how many people are self-employed and in which sectors. There is no evidence cited to support otherwise. Working for sustainable regeneration must involve matching skills/ potential new jobs/ land/ premises and relating these to a travel strategy to reduce or eliminate radial or cross London commuting. Technology makes much possible now. The Authority should seek to support initiatives which bring the objectives together.

Suggested changes and revised wording:

Additional text: "The Council will develop the evidence base to enable support to be given to all sectors of the local economy and local employment extended".

55 Issue/topic: Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 4 – Support SME

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This policy is only meaningful if all land or use currently designated “employment” is strongly protected. The range of SME is huge and their activity ranges from industrial through all sectors to professional services. The types of provision cannot therefore be readily predicted; by their nature the enterprises spring from entrepreneurship in private and voluntary sectors. The upward effect on land values should sites be seen as vulnerable to housing takeover, therefore has to be counteracted by strong policy in favour of employment. If affordable land is not available the possibility of new enterprises being established is much reduced; new enterprises are very sensitive to premises costs, especially in a context of a difficult borrowing environment.

The argument that this could lead to sites being vacant is not a good argument. For a start the borough is heavily developed and should a site need to be dormant for a period there are often alternative short-term uses which meet needs. For example, near Kings Cross there is a site with “gardens in skips” and the cheese grater site was temporarily landscaped. Some sites could be used for educational projects to link with the training objectives in this policy. The bottom line is that we need all the land that we can find to be safeguarded for employment.

Suggested changes and revised wording:

Additional text: “A supply of land will be ensured for SME by not permitting any land in employment uses to go out of employment use, including to housing use”.

(40)
10 3912
4/42/5 1

56 Issue/topic: Employment

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 5 – Diverse north London economy ...

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The lack of ambition for Haringey in this policy is insulting. It seems as if Haringey is to play a support role by shifting stuff – “distribution and logistics”. The irony is that this kind of business is at present quite muscular even in the retail context. Should Haringey settle for the industrial equivalent of “passing the parcel”?

Suggested changes and revised wording:

Additional text: “The LA will pursue a diverse north London and London economy which over time will reflect the range of skills developed by the population. This will entail keeping under review the opportunities for encouraging new and diverse enterprises and not limiting the employment base to manufacturing and the industries traditionally associated with much of the east of the borough; those industries have gone and will not return. The LA will also encourage home working where this is appropriate”.

(42)
 15/09/2
 4/42/5.1

57 Issue/topic: Strategic Industrial Locations

Page Number: 113

Paragraph Number:

Policy Number: SP8

Objective Number: Bullet 1 and 2 – Tottenham Hale and Part of Central Leaside

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

These lands should be safeguarded but the possibility of sectors becoming “higher grade” employment use should be the ambition.

Suggested changes and revised wording:

Additional text: “The Council will safeguard these lands as employment sites especially suited to but not exclusively as industrial locations”.

10 39/2 (42)
46.42/51

58 Issue/topic: Locally Significant Industrial Sites

Page Number: 113
Paragraph Number:
Policy Number: SP8
Objective Number: All bullet points

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

- Is or Is Not Effective:

NOT Effective

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

All the sites should be fully safeguarded with the ambition that over time full and if possible higher grade employment uses be established.

Suggested changes and revised wording:

To the end of the text add "Only employment uses will be permitted."

(42)
ID 392
4/42/5.1

59 Issue/topic: Local Employment Areas

Page Number: 114

Paragraph Number: 5.1.4

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

For the reasons set out in comments to page 113, all employment land in Haringey should be safeguarded. There should be no release of such land unless there are the most exceptional circumstances to require the policy to be deliberately set aside.

Suggested changes and revised wording:

Omit the last sentence and include "No loss of floorspace for employment use will be permitted and all applications for employment use must demonstrate that no net loss of jobs will result from the development. Mixed use where permitted should be dominated by employment uses and housing should not be the objective of the development".

*12-2010
4/6 - d43/p.1*

60 Issue/topic: Local Employment Areas

Page Number: 114

Paragraph Number: 5.1.5

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- | | |
|----------------------------|---------------|
| - Is or Is Not Justified: | NO |
| - Is or Is Not Effective: | NOT Justified |
| - Is or Is Not Consistent: | NOT Effective |

Reasons for Not Compliant or Unsound:

This is incoherent and overlooks the flexible possibility of employment use made possible by the GDO, especially the provision which enables working from home and the use of a dwelling as a place for up to six people to work from. The Council in their policy should make provision and indeed encourage such permitted development to strengthen the local economy and effect a much more efficient use of the land which avoids the negatives of commuting/ pollution, and has positive benefit of more eyes and ears to provide passive security within residential areas.

Suggested changes and revised wording:

Additional text: "The Council recognises and supports the flexible possibilities of employment use made possible by the GDO especially in the provision which enables working from home and the use of a dwelling as a place for up to six people to work from".

10 4/4/5.1
F18.

61 Issue/topic: Strategic Industrial Locations

Page Number: 114

Paragraph Number: 5.1.8

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The limitation to B uses is not coherent. The incorporation of other employment uses in this land just may be advantageous to the 5000+ new Enfield residents. Are they all going to be so ambitious as to want to be a warehouse worker? The range of jobs/ employment possibilities within the borough must be seen in a wider context than is displayed in this paragraph.

Suggested changes and revised wording:

Revise text to state that all employment land will be protected to encourage a wide range of employment uses.

10. A20 4/48/51

62 Issue/topic: Strategic Industrial Locations

Page Number: 115

Paragraph Number: 5.1.9

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

NOT Effective

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph entrenches a logic of “release” of employment land that is no longer coherent, if it ever was. Haringey has gone through a period of industrial decline and the land in the east of the borough, once so used, is underused at present. However, the “release” of this land, inevitably to housing, would entrench all the areas problems, not mitigate them. There is in this plan a feeling of desperation which derives from the housing target. One must observe that the creation of new housing (private or publically funded) depends much upon the overall economic circumstances. If the only land that is attractive to develop at a time of financial restraint is “cheap” land then “industrial land” will be put under undue pressure. Especially if any decontamination and infrastructure is publically funded, this argument for “release” does not make sense.

Suggested changes and revised wording:

Remove the references to “release” of land in employment uses and include as follows: “The currently inefficiently used land (814 hectares former industrial uses) should be retained for development over time based around employment uses. This land is all close to areas of high unemployment. The land will not be permitted to be developed by housing-led schemes as this will entrench the existing problems. If need be the land should be temporarily landscaped to render it more attractive for short-term uses and be gradually developed. The LA will welcome such proposals.”

63 Issue/topic: Local Employment Areas

Page Number: 115

Paragraph Number: 5.1.12

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

For the reasons set out in comments to pages 113/114, all the land should be protected as employment use land. Mixed use, which means housing led development, should not be an option for any of these sites. Of all the mixed use development recently carried out the employment generating part of the mixed use is a few jobs in retail and some public sector relocation of jobs e.g. a local neighbourhood police station at Lordship Lane/ Great Cambridge Road junction. There is no other kind of use generated to date. The local authority should provide an audit of the outcome of mixed use development to date including the vacancy rate.

Suggested changes and revised wording:

Omit the word "residential" from the first sentence. Include: "Experience of "mixed use" to date has not been good. The schemes so far approved and built have contributed very few jobs when housing-led. For this reason housing-led schemes will not be encouraged".

W. 425 4/47/15.1

64 Issue/topic: Local Employment Areas

Page Number: 115

Paragraph Number: 5.1.13

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This para refers to DMP19 which itself refers to a review (2009) of the 2004 Employment Study. The review recommends that all employment land, whether designated or not, should be protected. This supports the proposal made in this submission.

Suggested changes and revised wording:

Include: "The 2009 Review of the 2004 Employment Study concluded that all (designated or not) employment land should be protected and this is the Authority's policy so that over time the uses within the borough are better in balance and sustainable".

65 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 117

Paragraph Number: 5.1.14

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The job figure of 61,000 (2006) excludes self-employment. Does this really mean self-employed or does it mean home workers? The self-employed figure and home worker figures should be determined so that policy can be better developed.

Suggested changes and revised wording:

The text should be revised to specify and be clear as to what categories of work are included in the 61,000 figure.

18/28 4/49/5.1

66 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 117
Paragraph Number: 5.1.16
Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The London Plan (2008) growth figure (2006-2026) is 300,000 additional jobs. The growth figure for Haringey is not provided – it is needed to base policy for land allocation. The Council needs to provide an up to date Haringey figure based on research and policy projection in order that the policy may be properly examined.

Suggested changes and revised wording:

The growth figure for Haringey should be provided and the source of the data should be identified.

4/8/5-1
W

67 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 117
Paragraph Number: 5.1.18
Policy Number: SP8
Objective Number:

Handwritten notes:
A circle with a diagonal slash through it, followed by the text "4/5/5-1".

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Full retention of all employment land is supported by the authority's own study with which AGRA concurs. The last part of this paragraph is therefore not supported i.e. no "flexibility" with respect to other than employment based uses should be allowed.

Suggested changes and revised wording:

The last sentence of this paragraph should be removed.

68 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 117

Paragraph Number: 5.1.19

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This para states that much of 137,000 m2 (1.4 million square feet) of B1, including light industrial, could be accommodated in the Wood Green Metropolitan Town Centre or District Town Centres. This is no justification for this statement. Access problems to the WGTC are already notorious and the cause of much distress to adjacent residents and those living on the streets used for access. This is inconsistent with policies to achieve an improved environment with respect to air pollution, noise, traffic reduction, and ease of congestion.

The last sentence on page 117 is not in context – it cannot be used to support the WGTC and Town Centres programme.

Suggested changes and revised wording:

Omit the reference to WGTC and the District Town Centres and include: “It is noted that employment land identified in the study is not within Town Centres and this presents challenges. Further research is needed as to how these challenges can be brought together into a sustainable policy for light industrial and retail in the borough. Sustainable retail policy may entail revision of the objectives that retail policy is to pursue, for example by ensuring that local needs are met first by the retail provision”.

69 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 118

Paragraph Number: 5.1.20

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Local Authority in a recent planning decision (Train Depot in Haringey) went against this policy. We approve of 5.1.20 and would support the LA in carrying out such a policy rather than renegeing from it. In the case of the Hornsey site, the LA took the decision on the basis that the railway (employment generating) development would be seen from a derelict site which they hope to develop with housing. This kind of decision is inconsistent with the policy positions set out in the LDF.

Suggested changes and revised wording:

Additional text: "The Council places non retail employment generation as a high priority which is to be properly balanced with other competing needs."

10 432.4/3/5.1

70 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 118

Paragraph Number: 5.1.21

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This para is one of the few which gives evidence that there is demand for office space in the borough. There seems to be no policy development from this e.g. that employment land which is suitable for such use will be identified and positively promoted for the use if need be, by flexibility in change of use class, perhaps from industrial. The increase of business use is to be greatly encouraged.

Suggested changes and revised wording:

Additional text: "The Local Authority will take every opportunity to expand the provision of land and identify suitable premises for these uses and support such developments wherever possible".

(Handwritten mark)

*10-482
4/54/5-1*

71 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 118

Paragraph Number: 5.1.22

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- | | |
|----------------------------|---------------|
| - Is or Is Not Justified: | NO |
| - Is or Is Not Effective: | NOT Justified |
| - Is or Is Not Consistent: | NOT Effective |

Reasons for Not Compliant or Unsound:

This para, at least in part, contradicts the para 5.1.21. Para 5.1.22 cites studies which pre-date this Authority's development of its policy known as "Areas of Change". Para 5.1.22 makes no attempt to redress the balance of commuting which is inconsistent with other policy.

This para 5.1.22 is also unhelpful in that it confuses land associated with large scale uses (e.g. warehousing) with uses by SME users. There is a need for clarity; it is by no means clear what 5.1.22 means. The issues need to be clarified and addressed separately.

Suggested changes and revised wording:

Amend the text so that the meaning is clear and can be properly considered.

The Council needs clear policies that addresses the shortage of good quality space for small businesses as described in 5.1.21 and policies that might address the opportunities for large scale uses as described in 5.1.22.

Handwritten notes:
10 483-
4 5 15.1

72 Issue/topic: Protection and Enhancement of Existing Employment Sites

Page Number: 119

Paragraph Number: 5.1.24

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This is so general that it has no relevance to speak of. Is there any action to flow from the Outer London Commission's findings? If there is it would be helpful to have it in the plan. If not then the reference is unhelpful.

Suggested changes and revised wording:

Add text to identify actions to flow from the Outer London Commission's findings. If there are no identifiable actions, then the text should be deleted.

10. ~~485~~ 4/86/5.1

73 Issue/topic: Higher Density Uses on Existing Sites

Page Number: 119

Paragraph Number: 5.1.25

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The meaning of "higher density" is not at all clear. Density is a term used of housing and there is no definition given which would apply to this para. Does the para mean that more employment (i.e. numbers of jobs) will be encouraged; or that larger buildings (height and mass) will be favourably considered; or that more employment uses on individual sites will be positively encouraged; or is it all three? Or is it none of these three but something else entirely?

Suggested changes and revised wording:

Amend the text to provide a definition of "higher density" applicable to this paragraph so that the meaning is clear and can be properly considered.

Handwritten notes:
A.A. 10/88
D.A. 10/88
4/57/51

74 Issue/topic: Green Industries and Small and Medium Enterprises

Page Number: 119

Paragraph Number: 5.1.26

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

50/51
del
del
del
del

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The reference to "surplus industrial land" should be deleted for the reasons previously given. There should be no release except under the most exceptional circumstances. Note that the Community Infrastructure Study March 2010 (Table 3.2, page 18) suggests that the population of Haringey is 280,000.

Suggested changes and revised wording:

Delete the reference to release of "surplus industrial land".

75 Issue/topic: Key evidence and references

Page Number: 120
Paragraph Number: List of references

Policy Number: SP8

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The list of evidence is remarkable in that there are no studies cited which enquire about the number of self-employed and home workers. Nor have there been any studies undertaken of how and where the borough's residents might prefer to be employed. The evidence base misses out the people who live in the borough. Residents are not recognised as "stakeholders"; that term does not appear.

The Local Authority should undertake, if not already to hand, research to securely establish the real employment pattern and types of employment engaged in by borough residents. The views of residents should be established by a professionally conducted survey so that those views can be taken into policy making; a mechanism needs to be established which allows the residents, as stakeholders, to input to that policy formulation, just as other interests have had this opportunity.

Suggested changes and revised wording:

Evidence on the number of self-employed and home workers in Haringey should be provided. Revise text to state that the views of residents will be established, and a mechanism set up which allows residents to input to policy formulation.

4/59/51

12/4/08
WANTING FOR
EMBRACE TO
COME BACK
TO ME...

76 Issue/topic: Improving skills and training to support access to jobs and community cohesion and inclusion

Page Number: 121

Paragraph Number:

Policy Number: SP9

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The policy sets objectives of increasing and diversifying job opportunities for the local population – all to be encouraged. This cannot be done if the land which could be so used goes out of employment use. Most employees travel out, and if the percentage travelling out is not going to increase, and unemployment to rise, there is a need for employment in the borough. If jobs were in the borough, the jobs would be filled; therefore the emphasis in this plan as a whole needs to be employment. This SPD policy is supported; other policy should be made to align with it.

The policy objectives of housing and employment are not coherent. There is in the plan a fairly detailed housing strategy which is based on housing expansion, when in fact the population of the borough is massively underestimated in the plan; the Community Infrastructure Study March 2010 (Table 3.2, page 18) suggests that the population of Haringey is 280,000. It could be argued on the basis of doctor registrations that full housing expansion up to 2026 has already been more than achieved and that the challenge is quality rather than quantity. If we put this against employment policy we see that employment policy is not at all well developed; indeed the release policy puts employment at risk, and this would lead to a greater percentage of those living in the borough either working outside the borough or being unemployed. The result will be greater stress on transport, less long-term sustainability, and more social exclusion. This must be addressed to prevent the borough becoming a dormitory in the west and a permanently under-employed, poorly provided for east.

Suggested changes and revised wording:

Revise text to state that all employment land will be protected by not permitting any land in employment uses to go out of employment use, including to housing use”.

77 Issue/topic: Supporting Local Employment Training Schemes and Enterprise Development

Page Number: 121

Paragraph Number: 5.2.2

Policy Number: SP9

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:

- Is or Is Not Effective:

- Is or Is Not Consistent:

NOT Effective

Reasons for Not Compliant or Unsound:

The comparative unemployment rate given for the borough as a whole does not identify within the plan those wards with the highest unemployment. A ward by ward breakdown is needed so that policy can be better defined.

Suggested changes and revised wording:

A breakdown of unemployment rates ward by ward should be provided and the source of the data should be identified.

4/11/5.2
10/11/5.2

78 Issue/topic: Town Centres

Page Number: 125

Paragraph Number: Distribution of retail across Haringey

Policy Number: SP10

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This policy proposes a huge increase of retail floorspace of 13,800m² (145,000 square feet). WGTC and the 5 District Town Centres are said to be able to accommodate this. Policy on p117 (5.1.19) proposed an additional 1.4 million square feet of B1 for the same locations. It is not demonstrated where/ how the additional retail and B1 floorspace can be arranged without massive detriment to the area as a whole.

WGTC has over recent years ceased to be a balanced useful shopping centre and has become dominated by clothing chains and "poor quality" uses (there are eight betting shops on the west side of the High Road between Turnpike Lane and Wood Green). The WGTC uses and its recent direction might suit the interests of the clothing chains but the way in which the WGTC relates to and supports the diverse local population is not good. Policy needs to be refined so that diversity and range of shopping and other uses is brought about; the landlord/agent interest should not be allowed to determine WGTC.

Suggested changes and revised wording:

Omit this policy in its entirety. Include: "The Council will review the benefits which the current retail distribution bring to the borough, taking all interests into account and not just those of the landowners and retail chains, so that longer-term sustainability can be considered and balanced shopping facilities for the community evolve. The Council recognises that the retail offer in WGTC is poor

and new policy will seek to improve, diversify and provide a better range of services for the borough residents”.

79 Issue/topic: Protecting and enhancing Haringey's Town Centres

Page Number: 125
Paragraph Number: Para 3 – Development proposals ...
Policy Number: SP10
Objective Number:
Key Diagram Number/Title:

7/12/15
7/25/15
7/25/15

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The "Night Time economy" should not be further encouraged; the effects have been negative. With seven day shopping, the area never gets a break – there is constant noise and bustle in and all around WGTC. Night time quiet is vital for health; in the summer especially night-time uses are very problematic – windows open for ventilation admit the direct noise (the activity) and the indirect noise (traffic, deliveries etc).

Suggested changes and revised wording:

The reference to night time economy in Wood Green should be omitted and the existing night time use carefully controlled and not extended. Night time uses should have a time-limited permission when granted.

80 Issue/topic: Distribution of Retail Growth

Page Number: 126

Paragraph Number: 5.3.10

Policy Number: SP10

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

NOT Effective

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The thrust of PPS4 is understood and supported but the ambitions to enable intensification of existing locations must be in place. In the case of WGTC, essentially a traditional 19th century linear High Street with poor access, there is a limit on how it can be sustainably developed so that it remains in balance with the area. As it stands, the impact of WGTC on its residential hinterlands is immensely negative – a visit on foot to the back sides (east and west) of the WGTC is recommended.

The conditions do not exist for compatible effective massive growth. The “growth” which has been seen in recent years has been of questionable benefit, to say the least, to the local population. A survey of the High Road of twenty years ago, or even ten years ago, would reveal a place of greater diversity and interest than now. There were no one arm bandit machines, there were practically no bookmakers, and there were fewer take-aways. There were shops which catered for a wider range of customers’ needs than now.

Policy is needed to redress the qualitative decline, and the interests of landlords (high rents) should not be allowed to squeeze out useful service providers.

Suggested changes and revised wording:

Additional text: “Expansion of existing retail centres will have to be justified by reference to the diversification of the retail services which the development can bring and to be consistent with the improvement of adjacent, adjoining and

hinterland residential areas, for example by well managed and appropriate safe delivery arrangements. The visual degradation associated with existing development is unacceptable and will not be repeated”.

81 Issue/topic: Ensuring a Range of Shops and Other Appropriate Town Centre Uses

Page Number: 128

Paragraph Number: 5.3.13

Policy Number: SP10

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The logic of this para is upside down. Car ownership should not be seen as a way for the local population to avoid using local facilities! This para is entirely the wrong way round; the needs of the entire spectrum of the population need to be addressed. People will shop locally if their needs are reasonably met. The policy here colludes with car-use and is inconsistent with plan policy to reduce car use. If goods and services are in reasonable distance, people can choose to walk to them, be they car owners or otherwise.

Shopping facilities provided within the borough should contribute to sustainability enabling residents to access the full range of goods and quality of goods that they can reasonably expect in a major city. The policy of the Authority should therefore seek such diversity and range so that such needs are met and will not permit monocultural retail deserts (as WGTC is becoming). To achieve this objective the Authority should prevent some uses to dominate others. There is a problem when a High Street has very high rents adjacent to charity shops. The deficiencies in retail will be attempted to be addressed in applying policy.

Suggested changes and revised wording:

Additional text: "The policy of the Authority will be to seek diversity and range of shopping facilities provided within the borough so that residents can access the full range of goods and quality of goods that they can reasonably expect in a major city. To achieve this objective the Authority will prevent some uses to dominate others".

82 Issue/topic: Ensuring a Range of Shops and Other Appropriate Town Centre Uses

Page Number: 128

Paragraph Number: 5.3.14

Policy Number: SP10

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph confuses Inner London and Outer London statistics for car ownership. This paragraph is therefore meaningless and needs revision.

Suggested changes and revised wording:

Amend the text to provide separate and distinct statistics for Inner London and Outer London car ownership so that the meaning is clear and can be properly considered.

~~SP10~~ 4/66/5.3

83 Issue/topic: Ensuring a Range of Shops and Other Appropriate Town Centre Uses

Page Number: 128

Paragraph Number: 5.3.15

Policy Number: SP10

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph confuses Haringey statistics with national statistics – an Outer London comparison may be useful as a benchmark. If not available the paragraph should be deleted.

Suggested changes and revised wording:

Amend the text to provide separate and distinct statistics for Haringey and comparators so that the meaning is clear and can be properly considered. If the data is not available then the paragraph should be deleted.

4/62/5.3
6/19

4/ 68/5.2

84 Issue/topic: Sustainable Community

Page Number: 138

Paragraph Number:

~~650~~

Policy Number: SP11 - Design

Objective Number: Bullet 3 – Solutions to reduce crime...

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Strategy is to be congratulated in requiring that all development shall: "incorporate solutions to reduce crime...". It would be helpful if the Strategy stated what it is actually recommending and to address the issue of why we still have crime after years of 'designing out crime' policies.

Crime is not the whole story for the urban environment. This strategy needs some scepticism on the crime question and to include additional measures that improve the attractiveness and value of the urban environment.

Suggested changes and revised wording:

Some explanation of the performance of designing out crime policies to date is required, an analysis of why they have or have not worked, and the articulation of clear policy well grounded in the evidence base is needed.

85 Issue/topic: Tall buildings

Page Number: 139

Paragraph Number:

Policy Number: SP11 – Design (Tall Buildings)

Objective Number: Bullet 4 – adopted masterplans

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Bullet 4 posits an “adopted masterplan framework” to be in place under which tall buildings will be assessed. The Core Strategy should state what these masterplans are, to which areas and sites they refer, when they will be produced and where they sit in the LDF set of documents.

Without clarity in the Council’s thinking the Core Strategy makes the entire Borough a potential location for tall buildings. It is not possible to consider the adequacies or otherwise of the Core Strategy policies with this uncertainty.

Suggested changes and revised wording:

The policy should state here or elsewhere the locations the Core Strategy has in mind for tall buildings.

(12)
4/16/8/5-3

86 Issue/topic: Tall buildings

Page Number: 139

Paragraph Number:

Policy Number: SP11 – Design (Tall Buildings)

Objective Number: Bullet 5 – CABE guidance

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Inspector's report on the UDP 2006 required (para 2.214) that applications for tall buildings should be assessed against criteria that would include:

“(a) high design quality, (b) acceptable relationship to surroundings, (c) appropriate site size and setting, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL”

The Inspector required these criteria to be included after a thorough and careful consideration of the issues, and in particular of the impact tall buildings in the Areas of Change would have on Metropolitan Open Land.

The Council accepted the Inspector's recommendations in their entirety in UDP 2006 policy UD9. The Council has not justified why they have removed UD9 bullets (d) and (e) from the list of criteria in SP11.

Suggested changes and revised wording:

Include the UDP 2006 policy UD9 criteria, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL in the SP11 criteria for tall buildings.

(66)
K/68/5.3
~~60~~

87 Issue/topic: Tall Buildings

Page Number: 141

Paragraph Number: 6.1.17

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text asserts that tall buildings will be considered outside of the two areas, Haringey Heartlands/Wood Green and Tottenham Hale. This is a departure from UDP 2006 that has not been justified by the Council.

There should be a presumption against tall buildings in Haringey. The character of the Borough would be quickly eroded. Tall buildings impose too much on nearby residents and this Borough is residential. This single fact makes the Borough unsuitable for tall buildings.

Does the Council have in mind locations for tall buildings outside the two Areas of Change? The Council's thinking should be made public in the Core Strategy so that the adequacy of the policies can be properly assessed.

Suggested changes and revised wording:

Delete the last sentence of paragraph 6.1.17

6/16/17
K/S

88 Issue/topic: Tall Buildings

Page Number: 141

Paragraph Number: 6.1.17

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Inspector's report on the UDP 2006 required (para 2.214) that applications for tall buildings should be assessed against criteria that would include:

“(a) high design quality, (b) acceptable relationship to surroundings, (c) appropriate site size and setting, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL”

The Inspector required these criteria to be included after a thorough and careful consideration of the issues, and in particular of the impact tall buildings in the Areas of Change would have on Metropolitan Open Land.

The Inspector explicitly considered the effect that tall buildings in the Heartlands/Wood Green Area for Intensification would have on the Alexandra Palace MOL, going on to state (para 2.207) that:

“There is little doubt that inappropriately designed tall buildings in Haringey Heartlands could have an adverse visual impact on local views from both Alexandra Park and the surrounding residential area. There would thus be a requirement for any tall building in this location to be subject to very close scrutiny by qualified professionals”

(6a)
6.1.17
4/6.1.17

The Council accepted the Inspector's recommendations in their entirety in UDP 2006 policy UD9.

The Council has not justified why they have removed UD9 bullets (d) and (e) from the list of assessment criteria in paragraph 6.1.17.

Further, the Core Strategy must make it clear that all the criteria apply to applications for tall buildings both outside and inside the Haringey Heartlands/Wood Green and Tottenham Hale areas. As it stands the text is ambiguous on this point.

Suggested changes and revised wording:

- (1) Include the UDP 2006 policy UD9 criteria, (d) wind turbulence and overshadowing and (e) impact on historic environment, Green Belt and MOL in the assessment criteria for tall buildings.
- (2) Make it clear that the assessment criteria apply to all tall buildings wherever they are proposed
- (3) Delete the reference to tall buildings outside the Haringey Heartlands/Wood Green and Tottenham Hale areas, or if not:
- (4) Provide site specific information as to where the Council may be willing to consider applications for tall buildings.

89 Issue/topic: Conservation

Page Number: 142
Paragraph Number:
Policy Number: SP12 - Conservation
Objective Number: SP12 – Bullet 6 – strategic view

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

An additional bullet is required in SP12 to protect local views of importance. The Core Strategy recognises their importance in paragraphs 6.2.16, 6.2.17 and 6.2.18.

Important local views have disappeared in recent years as a result of development, for example, the view of Alexandra Palace from Wood Green Common and the Wood Green Common Conservation Area.

The Inspector's Report into the UDP 2006 chided the Council for dropping the list of locally important views present in the 1998 UDP (para 2.113), and encouraged the Council to act quickly to include a new schedule of these views into the UDP 2006 (para 2.121).

The Inspector forcefully made the point (paras 2.126 and 2.113) that the issues of the identification and protection of these views was too important to be left to lower level guidance (SPGs in this case).

Five years after the UDP Inquiry, Haringey still does not have a list of views of local importance. The Borough has gone backward since 1998. In view of the Council's lack of effectiveness and commitment to the issue, a bullet directly addressing views of local importance in SP12 is clearly justified.

70
~~658~~
4/70/6.2

Suggested changes and revised wording:

An additional bullet is required in SP12 to protect local views of importance and a statement to the effect that any applications for substantial development will be expected to assess views and impact until such time as the Council has a list of local views published. (A timetable for providing such a list should be established). This will give security to all parties in the process.

90 Issue/topic: Haringey's Heritage

Page Number: 143

Paragraph Number: 6.2.5

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): YES
- Is or Is Not Justified: IS Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

71
~~63A~~
4/7/16.2

Reasons for Not Compliant or Unsound:

AGRA welcomes the apology by the Council that post-war development in the Borough not always been of the highest quality design or sensitive to its setting. It is unfortunate that the post-war period continues up to the present day.

Leaving aside the issue of accountability for past errors, which are of course a sunk cost, it does raise the issue of the effectiveness and quality of the governance of the Planning Committee and the Planning Department.

While the Core Strategy may not be the appropriate place to discuss this issue, we sincerely hope that someone, somewhere is doing precisely this.

Suggested changes and revised wording:

91 Issue/topic: Strategic and Local Views

Page Number: 147

Paragraph Number: 6.2.18

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph asserts that Local Views will be identified in a forthcoming Conservation SPD.

Important local views have disappeared in recent years as a result of development, for example, the view of Alexandra Palace from Wood Green Common and the Wood Green Common Conservation Area.

The Inspector's Report into to the UDP 2006 chided the Council for dropping the list of locally important views present in the 1998 UDP (para 2.113), and encouraged the Council to act quickly to include a new schedule of these views into the UDP 2006 (para 2.121).

The Inspector forcefully made the point (paras 2.126 and 2.113) that the issues of the identification and protection of these views was too important to be left to lower level guidance (SPGs in this case).

Five years after the UDP Inquiry, Haringey still does not have a list of views of local importance. The Borough has gone backward since 1998.

The Inspector was of the view that a list of identified Local Views was too important to be inserted into an SPG. Similarly, such a list is too important to be left to an SPD. The list should be in the Development Management Policies document: this is the appropriate place for criteria or factors for decision against Plan policies.

4/72/6.2
SPG

The production of the List of Local Views is now, after 5 years, a matter of urgency. The Council should undertake to meet a very near term deadline for the production of this list (as suggested by the Inspector UDP 2006).

Suggested changes and revised wording:

Revised text:

“The List of Local Views will be appended to the Development Management Policies, in time for Public Examination by the Inspector in October 2010.”

92 Issue/topic: Open Space and Diversity

Page Number: 150

Paragraph Number:

Policy Number: SP13 – Open Space and Diversity

Objective Number: Developers – Bullet 1 – play space elsewhere

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The sense of this bullet is that Developers may substitute S106 agreements for their obligation (Housing SPD 2008, para 8.9, 8.10, 8.13) to provide play space within the developments they hope to build.

This cannot be wise.

The bullet should make clear that it does not apply to Private and Community Amenity Space as specified in the Housing SPD 2008, para 8.9, 8.10.

Suggested changes and revised wording:

Modify this bullet to make clear it does not apply to Private and Community Amenity Space obligations as specified in the Housing SPD 2008, para 8.9, 8.10, and that the required play space cannot be traded for other benefits via S106.

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Handwritten: 73 and a signature

93 Issue/topic: Protecting our open spaces

Page Number: 150

Paragraph Number: 6.3.3

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph asserts that development on the Borough's designated open space will be permitted, provided it is small scale. Additional safeguards are required of the development as per UDP 2006 OS3:

- It does not detract from the site's open nature and character
- It positively contributes to the setting and quality of the open space

Suggested changes and revised wording:

Add the following criteria to the paragraph:

- It does not detract from the site's open nature and character
- It positively contributes to the setting and quality of the open space

~~10~~ 4/74/6-3

94 Issue/topic: Protecting our open spaces

Page Number: 150

Paragraph Number: 6.3.3

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph only discusses designated open spaces. There are open spaces which are not designated and which require protection from development. The UDP2006 policy OS10 "Other Open Space" provides an admirable template for the Core Strategy to follow in adding policy, text and bullets on this point.

Suggested changes and revised wording:

Add text, policy and bullets to address opens spaces which are not designated, following the content of UDP 2006 Policy OS10 "Other Open Space".

C.9/34/7
(34)
2/10
350

95 Issue/topic: Protecting our open spaces

Page Number: 151

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title: Photograph at top of page

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The photograph at the top of page 151 is captioned as "Wood Green Common".

It is not Wood Green Common. It is Avenue Gardens N22.

Reference to this site can be found in the UDP2006 Schedule 10, Significant Local Open Land, site #11.

Suggested changes and revised wording:

Change the caption to the photograph to "Avenue Gardens N22"

10 E/7S /6.2
~~609~~

96 Issue/topic: Open Space deficiency

Page Number: 158

Paragraph Number: 6.3.21

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph states that: "Options for increasing access to Alexandra Palace Park from Haringey Heartlands should be considered". This is a hoary old issue and it appears no progress has been made in its resolution.

The impediment to access from Haringey Heartlands to Alexandra Palace Park is the Railway. Currently, the only crossing from the Heartlands to the Park is via a narrow subway tunnel under the Railway (the Penstock Path).

The only options to "increase access" are to provide additional subway tunnels under the railway, or footbridges over the railway. These are likely to be very expensive items and involve many engineering issues with the Railway. Realistically, they are unlikely to come to pass. Such was the conclusion of the UDP 2006 Inquiry. Continuation of this policy without a clear idea of its solution is simply not justified and not effective policy.

The Core Strategy should amend the paragraph and state precisely what options are feasible, state what it is going to do about bringing them to fruition, and discard those options which are unfeasible. If no option is feasible, then the policy should, regretfully, be dropped.

4/7/06 J
B 060

Suggested changes and revised wording:

The Core Strategy should amend the paragraph and state precisely what options are feasible, state what it is going to do about bringing them to fruition, and discard those options which are unfeasible. If no option is feasible, then the policy should, regretfully, be dropped.

97 Issue/topic: Nature Conservation

Page Number: 158

Paragraph Number: 6.3.23

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph states that Borough contains 60 SINC's. The Haringey Biodiversity Action Plan 2009 also identifies 60 SINC's, and is presumably the source of this statistic.

The UDP 2006 Schedule 11 identifies an additional four sites of Ecological Value that do not appear to be named in the Haringey Biodiversity Action Plan 2009 Appendix 2, Table 36: "List of SINC's".

This may be simply a confusion over names, mistaken identity, failure on assessment of the 4 sites to make the ecological grade, or, more seriously, an oversight in the Biodiversity Plan. (The Biodiversity plan incidentally identifies a further 6 sites that did not appear in the UDP 2006.)

The 4 missing sites present in Schedule 11 of the UDP are:

#43 – Allotments, Middleton Road N22, map reference J5

#45 – Allotments, Rivulet Road N17, map reference M5

#50 – Allotments, Millmead Road N17, map reference S8

#51 – Allotments, Coppetts Road N10, map reference D7

There is a possibility therefore that the Borough contains 64 SINC's.

C.9/E2/B.9
10/11/09

Suggested changes and revised wording:

The status of the 4 missing sites should be checked, and if necessary the number of Borough SINC's updated.

98 Issue/topic: Health and Well-being

Page Number: 163

Paragraph Number:

Policy Number: SP14 – Health and well-being

Objective Number: Bullet 1 – reduce health inequalities

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The bullet asserts that the goal is to reduce health inequalities in the areas with poorest health. It not clear which areas have the poorest health. Paragraph 7.1.6 points out that all areas have specific, but different, health problems. It is not clear that the simple prioritisation of Bullet 1 is the appropriate response to what is a more complex issue.

This bullet should be reconsidered to provide a more nuanced response.

Suggested changes and revised wording:

This bullet 1 should be reconsidered to provide a more nuanced response.

99 Issue/topic: Health and Well-being

Page Number: 163

Paragraph Number:

Policy Number: SP14 – Health and well-being

Objective Number: Bullet 2 – Identify sites

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Bullet 2 proposes prioritising new health infrastructure into Haringey's growth areas. Haringey's growth areas are not the areas with the greatest health inequalities, so this bullet is incompatible with bullets 1 and 4 of the policy which prioritise resources to areas of greatest health inequality. The Community Infrastructure Study March 2010 (Table 3.2 page 18) does not, for example, indicate a shortage of GPs in the Central area where the Haringey Heartlands is located.

The text should identify why Haringey's growth areas should be prioritised over areas of greatest health inequality, and if not justified, delete text "especially within Haringey's growth areas"

Suggested changes and revised wording:

The text should identify why Haringey's growth areas should be prioritised over areas of greatest health inequality, and if not justified, delete text "especially within Haringey's growth areas"

~~063~~ (78)
K/78/7-1

100 Issue/topic: Health and Well-being

Page Number: 163

Paragraph Number:

Policy Number: SP14 – Health and well-being

Objective Number: Bullet 3 – support the provision

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Bullet 3 envisages supporting health facilities through, inter alia, planning contributions. This is unwise. It has become the norm for planning applications for larger developments to come complete with a 'health centre' or other element of 'health' infrastructure attached. These additions are always unknown to the local NHS providers, are unfunded by the local NHS providers, and do not address the service priorities of the local NHS providers.

The purpose of these additions is simply to provide a carrot to encourage grant of the application. Without the prior funding agreement of the local health service providers in advance of the grant of the application, the proposed facilities never come to fruition.

The bullet should start with the text: "With the agreement of the Council, Haringey Strategic Partnership, and health service providers, support the provision of..."

Suggested changes and revised wording:

The bullet should start with the text: "With the agreement of the Council, Haringey Strategic Partnership, and health service providers, support the provision of..."

101 Issue/topic: Health and Well-being

Page Number: 163

Paragraph Number:

Policy Number: SP14 – Health and well-being

Objective Number: Bullet 4 – prioritise poorest health

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The bullet asserts that interventions and resources will be prioritised to areas of the Borough where health inequalities are greatest. It not clear which areas have the poorest health. Paragraph 7.1.6 points out that all areas have specific, but different, health problems. It is not clear that the simple prioritisation of Bullet 4 is the appropriate response to what is a more complex issue. At first sight an emphasis on priority diseases would be more appropriate than an emphasis on geographical areas.

The Community Infrastructure Study March 2010 (Table 3.2 page 18) indicates a large underprovision of GPs in the Southeast area of the Borough which is surely worthy of correction.

A more subtle response to this issue also needs to address whether a lack of health facilities is the cause of health inequalities, and whether extra resources can change health inequalities.

This bullet 4 should be reconsidered to provide a more nuanced response.

Suggested changes and revised wording:

This bullet 4 should be reconsidered to provide a more nuanced response.

668 (78)
4(78/7.1)

102 **Issue/topic:** Delivering health services and facilities

Page Number: 168

Paragraph Number: 7.1.20

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text states that a “greater capacity requirement of practices” is needed in the north east Tottenham area. It is not clear what this means: more practices or an increase in the capability of existing practices.

Suggested changes and revised wording:

Explain the meaning of a “greater capacity requirement of practices”

103 Issue/topic: Delivering health services and facilities

Page Number: 168

Paragraph Number: 7.1.20

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph states that an additional 6-8 GPs will be required by 2016/17 to accommodate population growth.

The Community Infrastructure Study March 2010 shows (Table 3.1, page 18) that based on the GLA PLP High 2007 population figure for 2009 (230,000) Haringey already has an excess of 56 GPs, capable of serving an additional 95,200 population at the HUDU rate (1 GP per 1,700 pop) or an additional 41% of the GLA PLP High 2007 population figure for 2009.

The Community Infrastructure Study March 2010 suggests (Table 3.2, page 18) that based upon the count of patients on GPs lists (indicating a population in Haringey of 280,000, or 22% greater than the GLA figure), Haringey still has an excess of 27 GPs, capable of serving another 46,000 population.

The Core Strategy estimate (para 3.1.2) of population growth in Haringey is of a projected 15% population increase to 260,305 by 2026, or some 30,000 people. This additional population seems to be well within the capacity of the current health infrastructure as indicated by the Community Infrastructure Study.

The assertion of an additional 6-8 GPs by 2016/17 seems therefore unjustified.

Suggested changes and revised wording:

Justify the estimate of an additional 6-8 GPs.

104 Issue/topic: Delivering health services and facilities

Page Number: 168

Paragraph Number: 7.1.21

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

It appears that Government policy is for PolyClinics not to proceed. The Core Strategy policy articulated in the paragraph is now not relevant. New policy is required.

Suggested changes and revised wording:

New policy is required as it appears that Government policy is for PolyClinics not to proceed.

105 Issue/topic: Impact of the built and natural environment

Page Number: 168
Paragraph Number: 7.1.22, 7.1.23
Policy Number:
Objective Number:
Key Diagram Number/Title:

4/8/17.1
683.

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This paragraph does not go far enough in identifying specifically how spatial planning can impact positively on well being.

In particular, in achieving this objective it is essential that streets are created which are understood by people so they feel safe and comfortable in their surroundings.

Urban design should be based on the continuity of the street pattern of the Borough, and if opportunity arises, the natural street pattern should inform the new layout.

Suggested changes and revised wording:

Additional text:

“Spatial planning should emphasise the feeling of safe and comfortable streets based on the continuity of the street pattern of the Borough, and if opportunity arises, the adjacent street pattern should inform new layouts.”

106 Issue/topic: Impact of the built and natural environment

Page Number: 168

Paragraph Number: 7.1.24

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:

- Is or Is Not Effective:

- Is or Is Not Consistent:

NOT Effective

Reasons for Not Compliant or Unsound:

The text on overcrowding and families should point out that conversions of family houses to flats has created the greatest loss of family housing in the Borough, and has thus contributed to the overcrowded condition of family accommodation in Haringey today.

The text should volunteer and support policies on limiting the number of conversions and removal of family accommodation, as per the Housing SPD 2008 Chapter 9, page 27-29, para 9.1 through 9.12.

Suggested changes and revised wording:

The text should volunteer and support policies on limiting the number conversions and removal of family accommodation, as per the Housing SPD 2008 Chapter 9, page 27-29, para 9.1 through 9.12.

107 Issue/topic: Impact of the built and natural environment

Page Number: 169

Paragraph Number: 7.1.27

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

~~107~~ 4/83/7.1

Reasons for Not Compliant or Unsound:

The text asserts that mixed use improves opportunities for employment. No evidence has been produced to support this assertion. The evidence from existing mixed use development in Haringey is that if the employment uses are not empty, then they are taken up by poor uses such as rather tatty betting shops and single niche grocers as the only tenants.

This is hardly constitutes "improved opportunities for employment".

The Core Strategy must take policies to support employment more seriously. Serious employment policy to benefit Haringey must encompass more than retail corner shops. The text of this paragraph is simply window dressing.

Suggested changes and revised wording:

Justify (with Haringey statistics) how mixed use development to date has improved opportunities for employment. Otherwise drop this assertion.

108 Issue/topic: Healthy Eating

Page Number: 171

Paragraph Number: 7.1.32

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph appears to confuse evidence with estimates. The *evidence* stated in the text from GP health records is that obesity is (a) very low overall and (b) highest in the Central area. The *estimates* say that obesity is (a) below London average and well below UK average, and (b) highest in the East area.

The evidence on obesity given here does not necessarily support the fattist tone adopted in the Core Strategy.

Suggested changes and revised wording:

Remove the fattist statements.

109 Issue/topic: Healthy Eating

Page Number: 171

Paragraph Number: 7.1.34

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text reports that the 2006 Haringey Residents Survey found that 40% of the population did not achieve the required level of physical activity (30 minutes of exercise on 3 or more days per week).

The Core Strategy should put forward policies to address this shameful lack of participation by the residents of Haringey to reduce obesity. The Core Strategy should consider more publicity to ensure wider voluntary participation in this exercise regime. Council publications such as Haringey People, and events such as Area Assembly meetings, have wide experience in disseminating exhortatory messages of this kind to the populace.

Suggested changes and revised wording:

The Core Strategy should consider more publicity to ensure wider voluntary participation in the required exercise regime.

2015 4/85 / 7.1

110 Issue/topic: Delivery Indicators SP14

Page Number: 173

Paragraph Number:

Policy Number: Delivery Indicators SP14

Objective Number: Bullet 2

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The bullet introduces the concept of “health inequalities” linked to “vulnerable community groups”. This has been introduced without reference to any vulnerable community groups identified in the text. It is not clear which community groups are to be targeted, or even whether those who live in damp and unhealthy houses, or are “fat” are a “community”.

The text and bullet needs to identify which are the community groups who are vulnerable.

Suggested changes and revised wording:

The text and bullet needs to identify which are the community groups who are vulnerable.

111 Issue/topic: Culture and Leisure

Page Number: 174

Paragraph Number: 7.2.1

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text reports the Haringey population figure to 6 significant figures (228,837). This must be considered to be of spurious accuracy.

The Community Infrastructure Study March 2010 suggests (Table 3.2, page 18) that the population of Haringey is 280,000, or 22% greater than the GLA PLP High 2007 figure of 229,666, based upon the count of patients on GPs lists.

Either the GP patient lists are wrong, and thus not to be used for planning purposes, or the GLA 2007 projection figure is wrong, and thus not to be used for planning purposes.

The text should state that the population of Haringey is probably between 230,000 and 280,000 people as it is almost certainly the case that the GP registrations indicate a more accurately the actual population.

Suggested changes and revised wording:

The text should state: "The population of Haringey is probably between 230,000 and 280,000."

~~707~~ 4/87/7.2

112 Issue/topic: Sustainable Community

Page Number: 174

Paragraph Number:

Policy Number: SCS Priorities

Objective Number: Bullet 1 – better opportunities

Key Diagram Number/Title:

Document is Compliant (Yes or No):


Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Shopping is not a cultural activity. Shopping is the death of culture.

Suggested changes and revised wording:

Delete shopping from this bullet and add something else more germane to a “sustainable community”.

2018/8/19 7.2


113 Issue/topic: Sustainable Community

Page Number: 174

Paragraph Number:

Policy Number: SCS Priorities

Objective Number: Bullet 2 – promote community cohesion

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text of paragraph 7.2.1 carefully differentiates the different communities in Haringey. The Bullet 2 wishes to promote community cohesion. It is not clear what concept of “community” is meant by “community cohesion”: is it the effort to promote cohesion between communities or to promote cohesion within separate communities, or both or something else?

The bullet should make clear what is meant by community cohesion.

Suggested changes and revised wording:

The bullet should make clear what concept of “community” is meant by “community cohesion”.

114 Issue/topic: Sustainable Community

Page Number: 174

Paragraph Number:

Policy Number: SCS Priorities

Objective Number: Bullet 3 – improve facilities

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Bullet 3 is not clear whether supporting facilities and so on is meant to be support across communities or support for individual communities and community groups, as para 7.2.1 indicates. There are clearly financial considerations which flow from this understanding.

Suggested changes and revised wording:

The Bullet 3 must make clear whether supporting facilities and so on is meant to be support across communities or support for individual communities and community groups.

(82)
~~20/08/17~~ 21/08/17.2

115 Issue/topic: Culture and Leisure

Page Number: 175

Paragraph Number:

Policy Number: SP15 – culture and leisure

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The opening text of this Policy makes no mention of dance, music, concerts and other activities. They are worthy of support in this Core Strategy and are not linked to “Cultural Areas”.

The opening text should mention these activities. Delete the word “through” at the end of the first sentence.

Suggested changes and revised wording:

The opening text should mention dance, music, concerts and other activities. Delete the word “through” at the end of the first sentence.

89

~~709~~

4/89/72

116 Issue/topic: Culture and Leisure

Page Number: 175

Paragraph Number:

Policy Number: SP15 – culture and leisure

Objective Number: Bullet 1 – development of following cultural areas

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The “following locations” listed in Bullet 1 have significant cultural resources for which the term “cultural area” is not appropriate.

The term “cultural area” should be dropped because most cultural activity – folk music pubs, churches, church halls, dance groups (children and adult), classes, flower arranging, gardening, cooking, choral societies, schools music, steel drum bands – takes place outside of any “cultural area” in a wide variety of venues.

This entire section indicates an absence of awareness of the range of cultural activities taking place in the Borough. The meaning of culture and leisure in this policy seems mainly concerned with activities housed in the Council’s real estate.

Suggested changes and revised wording:

Drop the term “cultural area”. Articulate meaningful polices to promote cultural activities throughout the borough.

(168)

~~20~~

4/8/17-2

117 Issue/topic: Arts and cultural activities

Page Number: 176
Paragraph Number: 7.2.5
Policy Number:
Objective Number:

~~7/10~~
4/20/22

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The state of repair of Wood Green Central Library is a disgrace, and does not show the Core Strategy's policy of support for Culture and Leisure in a good light.

Suggested changes and revised wording:

Additional text: "The Library infrastructure is highly valued and the Core Strategy will ensure that much needed maintenance of this infrastructure will be carried out"

118 Issue/topic: Cultural Areas

Page Number: 177

Paragraph Number: 7.2.8

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Which vicar wrote this?

Suggested changes and revised wording:

Delete this paragraph

Handwritten: 4/9/17.2

119 Issue/topic: Cultural Areas

Page Number: 177

Paragraph Number: 7.2.9

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text correctly identifies “Cultural Quarters” in the London Plan as the operational unit for the location of a critical mass of cultural activities and related uses.

The term “Cultural Area” is not a defined term. It should be removed in the Core Strategy and replaced with “Cultural Quarter”.

Suggested changes and revised wording:

The term “Cultural Area” is not a defined term. It should be removed in the Core Strategy and replaced with “Cultural Quarter”.

92
~~7.2.9~~
4/92/7.2

120 Issue/topic: Cultural Areas

Page Number: 177

Paragraph Number: 7.2.9

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The text of this paragraph is not about culture and leisure for residents – it is about the economy; viz. “management of the night time economy” and “potential for large scale commercial leisure facilities”.

The Cultural Quarter designation does not justify “very large scale development” against the interests of the residential population. It must be recognised that such facilities can never compete with the facilities of Central London, but can provide good cultural and leisure facilities in the local area; they will always be essentially local in their provision.

Suggested changes and revised wording:

Additional text:

“The Cultural Quarter designation does not justify “very large scale development” against the interests of the residential population. It must be recognised that such facilities can never compete with the facilities of Central London, but can provide good cultural and leisure facilities in the local area.”

Handwritten notes: (26) and 6/92/7.2

121 Issue/topic: Wood Green Cultural Area

Page Number: 177

Paragraph Number: 7.2.10

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The description of the Wood Green Cultural Quarter is incomplete and deficient:

The Cultural Quarter at Wood Green comprises work studios, with a bias towards arts industries. It is also occupied by solicitors, (picture) framers, and others. It seems to be a success in its own terms as a business enterprise supporting a number of jobs, but it is *not* a provider of cultural experiences to the population at large, except for an annual open weekend.

Suggested changes and revised wording:

Insert after second sentence:

“The Cultural Quarter at Wood Green comprises work studios, with a bias towards arts industries. It is also occupied by solicitors, (picture) framers, and others. It seems to be a success in its own terms as a business enterprise supporting a number of jobs, but it is *not* a provider of cultural experiences to the population at large, except for an annual open weekend.”

~~7/13~~

4/19/12

122 Issue/topic: Wood Green Cultural Area

Page Number: 177

Paragraph Number: 7.2.10

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The english in this text is deficient and confusing.

Insert a paragraph break after "Wood Green Action Plan." and before "Over the life..."

Suggested changes and revised wording:

Insert a paragraph break after "Wood Green Action Plan." and before "Over the life..."

7/2

4/19/17.2

123 Issue/topic: Harringay Green Lanes

Page Number: 178

Paragraph Number: 7.2.14

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

NO
NOT Justified

7/15

4/19/17-2

Reasons for Not Compliant or Unsound:

The text introduces Green Lanes District Centre. This serves only to add to the complete mishmash of aims and objectives in this entire chapter of the Core Strategy.

The Core Strategy hopelessly confuses and conflates:

- * cultural matters and the consumption of culture
- * the nature and support for the arts economy and creative businesses (they are different)
- * the development and regeneration of some areas

Suggested changes and revised wording:

The issue of regeneration of areas of the Borough should be dealt with in another section of the LDF.

124 Issue/topic: Tottenham Hotspur Cultural Area

Page Number: 179

Paragraph Number: 7.2.17

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

This topic is surely better discussed in the section "Sport and Recreation"

Suggested changes and revised wording:

This topic is surely better discussed in the section "Sport and Recreation"

Handwritten notes:
D/K
4/95/7.2

125 Issue/topic: Provision of Leisure and Sport Facilities

Page Number: 181

Paragraph Number: 7.2.24

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The discussion of a "district scale model rather than a full service, town centre model..." is not readily understandable. An explanation of what is meant is needed.

It would also be helpful if an explanation were offered as to why the swimming pool in Wood Green was sold off in the relatively recent past, if there is now a need for a pool.

Suggested changes and revised wording:

Redraft so that the meaning is clear

~~7/10~~

4/16/7.2

126 Issue/topic: Community Infrastructure

Page Number: 184

Paragraph Number: 8.1.1

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The section on Community Infrastructure should not be in the chapter 'Delivering and Monitoring the Core Strategy'. The Community Infrastructure is part of the Core Strategy to be delivered and the process of its delivery is the thing that should be monitored.

The current location of the Community Infrastructure policies and objectives gives the strong impression of it being an afterthought, which cannot be the intention.

The Community Infrastructure policies and objectives themselves should be elsewhere in the document. The obvious place is in Chapter 7 ("Healthier People with a Better Quality of Life", after "Culture and Leisure").

Suggested changes and revised wording:

Move the section on Community Infrastructure policies and objectives to Chapter 7.

127 Issue/topic: Community Infrastructure

Page Number: 185

Paragraph Number:

Policy Number: SP16

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO

- Is or Is Not Justified:
- Is or Is Not Effective NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

It is noted that Haringey will work with its partners to ensure appropriate improvement and enhancements of community facilities. The condition of the exterior of Wood Green Central Library to the High Road is a continuing source of shame to the Borough; the condition of the Council buildings and their maintenance is nowhere referred to in this plan. Without repair the facility is endangered and therefore it is relevant to the delivery of the plan objectives.

Suggested changes and revised wording:

Amend text to read that the LA will seek to secure funds to repair and maintain the premises which house their facilities.

~~7/9~~
4/98/8.1

128 Issue/topic: Primary Schools

Page Number: 187

Paragraph Number: 8.1.9

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The paragraph asserts that new primary school provision will be required to meet new housing growth in Haringey Heartlands. The proposed developments in the Heartlands have been very dense, flatted developments, not necessarily appropriate for family accommodation. The last planning application for example, HGY/2009/0503, proposed 1200 units, of which only 16 units had private garden space suitable for families.

It is not clear how many family units will be available in the Haringey Heartlands, and no forecast of the number of children of primary school age to be generated by the Heartlands has been produced. The Heartlands Development Framework 2005 is silent on this matter, and overall the level of extremely high densities proposed would seem to be against a very large proportion of family housing.

The assertion for new primary school provision up to 1500m² seems therefore to be unjustified.

The school which is being considered should be identified in the plan to enable a meaningful response to be made e.g. the proximity of additional space and the implications for the neighbourhood in which it is set.

Suggested changes and revised wording:

A reasoned forecast for the number of new primary school places is required linked to the forecast number of family units to be supplied in the Haringey Heartlands area.

129 Issue/topic: Primary Schools

Page Number: 187

Paragraph Number: 8.1.10

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

No forecast estimate is given for the number of units of family accommodation out of the 434 units to be built in the Tottenham Hotspur redevelopment. Given the type of development – high density flatted development – only a proportion of it can be suitable for family accommodation.

As justification for new school sites in the Northumberland Park area, a reasoned forecast for the number of new primary school places is required linked to the forecast number of family units to be supplied in the Tottenham Hotspur redevelopment.

Suggested changes and revised wording:

A reasoned forecast for the number of new primary school places is required linked to the forecast number of family units to be supplied in the Tottenham Hotspur redevelopment.

130 Issue/topic: Indicators to monitor the delivery of SP16

Page Number: 193
Paragraph Number: Fourth bullet point
Policy Number: SP16
Objective Number:

~~7/22~~ 4/10/18.1

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The number of "multi-purpose community facilities" (MCFs) appears as an indicator. The concept of "MCFs" has not made an appearance in the document. It is not clear what MCFs are and how the quantity of this provision would indicate anything relevant to Community well-being. It is not clear, for example, if a Library, a Youth Club or the Bernie Grant Centre are MCFs.

Suggested changes and revised wording:

The document needs to explain what MCFs are, and why the number of MCFs is relevant to community well-being. If this cannot be done then bullet point 4 should be removed.

131 Issue/topic: Community Infrastructure

Page Number: 196
Paragraph Number: 8.2.5, 8.2.6, 8.2.7
Policy Number:
Objective Number:
Key Diagram Number/Title:

2034/102/8.2

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified:
- Is or Is Not Effective: NOT Effective
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Paragraphs 8.2.5 through 8.2.7 on Community Infrastructure are in the wrong place ("Delivery and Monitoring"). They should be in the section "Community Infrastructure".

Suggested changes and revised wording:

Move Paragraphs 8.2.5 through 8.2.10 on Community Infrastructure to the section "Community Infrastructure", after para 8.1.2

132 Issue/topic: Health Infrastructure

Page Number: 210

Paragraph Number: Health Infrastructure, Project 2

Policy Number: Health Centre, Hornsey Central

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

NO
NOT Justified

4/103/9.2
~~7/24~~

Reasons for Not Compliant or Unsound:

The indicative cost is given as £400 per m2. A more realistic cost of floorspace for this application is £4,000 per m2.

Suggested changes and revised wording:

Update the indicative cost per to £4,000 per m2

133 Issue/topic: Health Infrastructure

Page Number: 210

Paragraph Number: Health Infrastructure, Project 3

Policy Number: Health Centre, serving east of Borough

Objective Number:

Key Diagram Number/Title:



Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The indicative cost is given as £400 per m2. A more realistic cost of floorspace for this application is £4,000 per m2.

Suggested changes and revised wording:

Update the indicative cost per to £4,000 per m2

134 Issue/topic: Primary and Secondary Education

Page Number: 210

Paragraph Number: Primary and Secondary Education, Project 2

Policy Number: Primary school capacity, Tottenham Hale

Objective Number:

(103)

Key Diagram Number/Title:

724

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

NO

- Is or Is Not Justified:

NOT Justified

- Is or Is Not Effective:

- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

It should be noted that a handsome London Board School was demolished at Tottenham Hale a few years ago.

Suggested changes and revised wording:

135 Issue/topic: Primary and Secondary Education

(63)
DA

Page Number: 211

Paragraph Number: Primary and Secondary Education, Project 3

Policy Number: Primary school capacity, Haringey Heartlands

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

The Core Strategy para 8.1.9 describes this facility as a 1500m² facility. The indicative cost is given as up to £6.5m or a floorspace cost of £4,330 per m².

Floorspace for this application is not normally this expensive.

Suggested changes and revised wording:

Update the indicative project cost to represent a more reasonable floorspace cost

136 Issue/topic: Leisure Services

Page Number: 213

Paragraph Number: Leisure Services, Project 3

Policy Number: White Hart Lane, Community Sports Hub

Objective Number:

Key Diagram Number/Title:

~~70A~~ (103)

Document is Compliant (Yes or No):

Document is Sound (Yes or No): NO
- Is or Is Not Justified: NOT Justified
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

What are the deficiencies that require demolition of the existing facilities ?

Suggested changes and revised wording:

137ends.

138 Issue/topic:

Page Number:

Paragraph Number:

Policy Number:

Objective Number:

Key Diagram Number/Title:

Document is Compliant (Yes or No):

Document is Sound (Yes or No):

- Is or Is Not Justified:
- Is or Is Not Effective:
- Is or Is Not Consistent:

Reasons for Not Compliant or Unsound:

Suggested changes and revised wording: