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Our ref: LRP58/Q5300/0/2
Your
ref:

Dear Ciara

19 June 2010

**PLANNING AND COMPULSORY PURCHASE ACT 2004 - TOWN AND COUNTRY
PLANNING (LOCAL DEVELOPMENT) (ENGLAND) REGULATIONS 2004 (AS AMENDED
2008)
LONDON BOROUGH OF HARINGEY**

REGULATION 27 CONSULTATION – CORE STRATEGY PRE-SUBMISSION PLAN

**REGULATION 25 CONSULTATION – DEVELOPMENT MANAGEMENT POLICIES AND
SITE ALLOCATIONS DPDS**

Core strategy

1. I refer to your letter of 10th May 2010 enclosing the above documents and supporting documents, which are on public consultation until the 21st June 2010.
2. Before providing our formal response on the Plan on behalf of the Secretary of State for Communities and Local Government, we feel it is appropriate to note our observation that the layout and content of this published Plan has clearly been the subject of significant work since its earlier stages. In many respects, it follows current best practice on core strategies in terms of layout and the type of content appropriate for core strategy policies. Other than the necessary or desirable revisions set out below, we consider that the document is easy to follow, explains clearly the strategy and its context, and includes the key policy information needed to show how the strategy will be implemented. Core Strategies are intended to be succinct documents that clearly set out a Council's strategy and the policies to achieve it. The Haringey Plan is generally effective in this respect.
3. The Secretary of State's consideration of the Plans, set out below, is based on the Soundness tests set out in PPS12 (para. 4.52). Please note that this letter constitutes our formal publication (pre-submission) stage written representations, unless the examining Inspector considers there to be merit in us participating at the oral examination. Where possible, we suggest how any concerns may be overcome.

Justified

- (a) Is the Plan founded on a robust and credible evidence base;



4. As you know, PPS12 paragraph 4.37 states that evidence gathered should be proportionate, relevant and up-to-date as practicable, having regard to what may have changed since the evidence was collected. It appears from the summary of the evidence base set out in Chapter 1.1.3 and the further policy-specific summaries that this covers the key topic areas, but you should ensure that the various studies contain the most up to date information. This may be particularly relevant with any elements that comprise data that was collected before the recent economic downturn and the updates might suggest revisions to policy. However, in general, we accept that the Plan does take account of the fact that a strategy for 15 years is likely to cover several economic cycles, which may impact upon the timing and delivery of development, such as infrastructure. Therefore, we believe that the changes to economic circumstances are unlikely to render this evidence base unsound.

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5. Also, you should ensure that the evidence base provides an appropriate background to all the policies in the Plan. Additionally, it is important that there are clear links between evidence base and policy. In this respect, we note that throughout the Plan the justification for each policy refers to the relevant background documents. Consequently, it is considered that, provided the evidence base is up to date and accurate, the policies would appear to have a sound basis.

(b) Is it the most appropriate strategy when considered against reasonable alternatives;

6. We note that the framework within which the Core Strategy is based is set out in Chapter 1 and that the links with national policy and the London Plan are clearly set out. In particular, we note the close link between the overall strategy and individual policies of this document and the Haringey Sustainable Community Strategy. This ensures that in meeting the Plan's objectives, the Council should also achieve the strategic outcomes of the SCS set out in Chapter 1.5.3. Overall, we consider that the Core Strategy's proposed approach represents a realistic option, which is likely to provide good opportunities for growth and change across the borough.

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Effective

(a) Is the Plan deliverable;

7. In our view, the proposed submission Core Strategy is generally adequate in communicating Haringey's strategy for delivering both the Strategic Outcomes and the Vision set out in Chapter 1.5. We consider that the policies provide clear information on the scale and location of major growth and the infrastructure needed to deliver it; and this is supported by Appendix 3 (Key Infrastructure Programmes and Projects), which details projects, timescales delivery partners and contingency arrangements for the provision of infrastructure. However, the Plan is not clear on the subsidiary DPDs/AAPs that will be prepared, especially those that will detail the Council's strategy for the key regeneration and growth areas. These should ideally be set out in the Plan as the core strategy provides the hook for those subsidiary DPDs. It would also be helpful if they were indicated on the Key Diagram. At present the only reference appears to be in para. 8.2.11 which mentions that "Area Action Plans will be prepared to provide more detailed guidance on sites", but does mention how many and for what sites. The current LDS only includes one AAP, for Wood Green, so, apart from the suggested revisions to the Core Strategy, the LDS will need to be updated before submission if you intend to do further AAPs.

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(b) Is the Plan flexible;

8. We note that the Plan has identified (policy SP2 and Figure 3.7) the key locations for housing provision and the amount of homes they will deliver such that the overall London Plan target should be met. Other policies identifying the need for land or additional floorspace for uses such as employment or retailing identify a range of locations and policy approaches to either protect existing floorspace or encourage new provision. Therefore, the Plan appears to provide adequate safeguards to ensure that the strategy is delivered over the next 15 years. On this basis, we consider that the Core Strategy is generally flexible in

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terms of its ability to meet its growth targets were there to be delays in development.

9. As regards the delivery of essential infrastructure, the Plan clearly sets out, both in the policies and their supporting text and Appendix 3, the key infrastructure needed to deliver the growth proposed in the Plan and, in particular, the focus on specific locations such as Haringey Heartlands and Tottenham Hale. However, whilst Appendix 3 contains details on contingency planning, it is not clear whether the delay in provision of any of the major infrastructure projects would have an impact on the delivery of the growth proposed in the Plan. It might be helpful if the submission document provided more information on this issue. However, it is acknowledged that many of the distinct growth or regeneration areas will be subject to lower order DPDs or AAPs and it may be that the detail on some infrastructure issues will be dealt with in more detail through those documents.

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(c) Is the Plan able to be monitored;

10. The Core Strategy includes key monitoring indicators at the end of the sections that follow each policy. There is also the separate Monitoring Framework that was not included with the documents sent to us, but we have looked it and note that it provides more detail about the indicators and gives targets (output column). We are not clear whether this freestanding document has formally gone out for consultation: this is important as it would be desirable if a summary of the targets was inserted in the core strategy itself at submission, but that would be difficult if it has not itself been the subject of consultation. The actual targets look generally appropriate and we consider that the document adequately deals with the issue of monitoring subject to the comments above.

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Consistent with National Policy

National Policy Issues

→ 4 week consultation before we submit

11. **Policy SP2:** The list of key evidence documents does not include an affordable housing viability assessment to underpin the affordable housing requirement, unless this is part of the Housing Needs Assessment, in which case it would need to be updated as the current document dates from 2007 and the Inspector is likely to expect up to date data on this issue (PPS3 para.29).

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12 **Waste:** We would draw your attention to the issue of waste: The core strategy is expected to be adopted early in 2011 and the current London Plan apportionment satisfies the requirement in PPS10 to make provision for a 10 year period. However, the Core Strategy covers a 15 year period so it would be helpful to refer to the forthcoming revised apportionment figures that will cover the post 2020 period.

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Development Management Policies and Site Allocations DPDs

13. We have no comments on these documents.

14. I trust that our comments are clear. If there are any matters that you wish to discuss, please let me know.

Yours sincerely

Christopher L. Baker
Planning Division

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