

**GREATER LONDON AUTHORITY**  
Development, Enterprise and Environment

**Stephen Kelly**  
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Haringey Council  
River Park House  
225 High Road  
Wood Green  
London N22 8HQ

**Our ref:** LDF14/LDD09, LDD10,  
LDD14 & LDD15/CG01  
**Date:** 4 March 2016

For the attention of Matthew Paterson (Local Plan consultation response)

Dear Mr Kelly,

**Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012**

**Re: Consultation on Alterations to the Strategic Policies DPD and preferred options draft: Development Management Policies DPD, Tottenham Area Action Plan and Site Allocations DPD**

Thank you for consulting the Mayor of London on the Regulation 19 stage of Haringey Council's Alterations to Strategic Policies, Development Management Policies DPD, Tottenham AAP and Site Allocations DPD (Proposed Submission Development Plan Documents). As you are aware, all Development Plan Documents (DPDs) have to be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has delegated authority to me to respond and his representations are set out below. Representations from Transport for London are attached in Appendix 1.

On 27 March 2015, my officers provided comments (reference LDF14/LDD15/LDD09/10/14/15/EK01) on the Haringey's Regulation 18 stage of these draft DPDs. Since those representations were made, Haringey has engaged in further discussion with the GLA, and the Council has responded positively to matters raised.

Having now considered the Proposed Submission Development Plan Documents against the London Plan, and also in the context of the parallel consultation by Enfield Council on its New Local Plan for Enfield, it is my opinion that **the Proposed Submission Development Plan Documents are in general conformity with the London Plan**. Notwithstanding this, a number of specific representations are provided below (and in the accompanying appendices) to emphasise the Mayor's position, and/or to help clarify or improve policy.

## **Alterations to the Strategic Policies DPD**

### **Housing**

The Mayor welcomes the commitment set out in Haringey's proposed policy SP2: Housing to meeting and exceeding the borough's minimum housing supply target of 1,502, as set out in Table 3.1 of the London Plan 2015, and in doing so meet its objectively assessed housing need of 1,345 per annum and contribute to wider strategic need in line with London Plan policy 3.3. Haringey has identified capacity for 22,000 homes over the plan period, excluding windfall sites. As set out in London Plan policy 3.3, Haringey is reminded that the 1,502 homes per annum is a minimum housing supply figure and Haringey should continue to look to identify additional housing capacity in the locations outlined in London Plan policy 3.3E to meet local and strategic need. Delivery of housing in the east of the borough will be supported through the designated Housing Zone, without compromising strategically important employment land. In this regard, the Mayor welcomes the additional text to paragraph 3.1.8 which notes the housing contribution that can be made in 'Areas of Limited Change'.

### Housing standards

References to space standards should refer to those set out in the Mayor's emerging Minor Alterations to the London Plan (MALP) which are due to be published shortly. The MALP adopts the Government's Technical Housing Standards - nationally described space standards. The MALP also adopts the Optional technical standards for access M4(2) - Accessible and adaptable dwellings and M4(3) - Wheelchair user dwellings. The Lifetime Homes Standards and local access standards are no longer applicable.

### **Employment designations**

As suggested in the Mayor's previous letter, the listing of all the employment related site allocations, including those allocated as Employment Land and Regeneration Areas, as well as LSIS and Strategic Industrial Locations is welcome and provides clarity on the proposed changes in significance of these sites.

Also as previously suggested, the Council should detail what the total quantum of industrial land release will be and how this will bear upon the borough's indicative industrial land release benchmark in the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG), having regard to other planned and actual release over the period 2011-2031. In addition, it would be useful to provide some commentary on how the planning designations to protect employment site interact with the designation of the Housing Zone.

## **Draft Development Management Policies DPD**

### **Locally Significant Views and Vistas and Building Heights**

There appears to be significant overlap between the locally significant views and the locations identified as being suitable for tall buildings. The document states that a Tall Buildings and Views Supplementary Planning Document will be produced. However, to ensure a robust approach, the borough should consider providing more detail in policy DM5 and DM6 as to what the views are aiming to preserve. Further detail should also be provided in the Wood Green Area Action Plan (AAP).

### **Housing Mix**

The Mayor welcomes Haringey's acknowledgement of the important role the private rented sector can play in providing housing choice. However, proposed policy DM11 should recognise, as the London Plan does, the distinct economics of covenanted private rented developments and this should be taken into account when undertaking viability assessments of covenanted schemes. Building on the draft interim version, the Mayor's Housing SPG will be published in March and will provide further guidance on the working of covenants and clawback mechanisms for private rented developments.

### **Special needs housing**

It is noted that the council will have regard to the London Plan's monitoring benchmarks for the provision of specialist housing for older people, this is welcomed. However, as stated in the Mayor's previous letter, the 2015 London Plan is clear that boroughs should identify and address the need for specialist older person's accommodation, including through targets and performance indicators. In addition, para 3.50C states that Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites. It is suggested that Policy DM15 and supporting text should be updated to address this. Opportunities for identifying suitable locations for older people housing could be progressed through Haringey's emerging Area Action Plans.

### **Energy and carbon dioxide emissions**

The Mayor welcomes the changes to the draft document, in line with his previous comments on this matter. With regards to the Mayor's carbon dioxide targets, as set out in policy 5.2 of the London Plan, further guidance on the definition of 'zero carbon' homes will be provided in the Housing SPG in March. Guidance on zero carbon development will also be provided in the revised Energy Planning - GLA Guidance on preparing energy assessments document. In support of policy 5.2 of the London Plan, the Mayor would encourage Haringey to set out an approach to carbon off-setting and establishing a ring-fenced fund in line with his Sustainable Design and Construction (SD&C) SPG.

### **Overheating and cooling**

The changes to this section are welcome. There is an opportunity to note the importance of providing 'cool' refuges within the public realm. Such an approach could link in with Haringey's proposed approach to open space and the green grid, especially where paragraph 4.15 notes the projected population increase, much of which is likely to be housed in flats with limited access to a garden.

### **Air Quality**

The Mayor welcomes Haringey's approach to environmental protection. The section on air quality should note the London Plan's 'air quality neutral' approach set out in London Plan policy 7.14 and the SD&C SPG. The Mayor's revised 'The Control of Dust and Emissions from Construction and Demolition' was published in 2014 and is available on the Mayor's web-site.

### **Flood Risk, Surface Drainage Systems and Critical Drainage Areas**

These three policies should be more closely linked with regards to the potential impacts and mitigation measures. Whilst Sustainable Drainage Systems are important across the borough, they are critical up catchment from the Critical Drainage Areas. In Critical Drainage Areas it is important that development does not displace potential flood water onto nearby sites. The impacts of flooding in Critical Drainage Areas may be as great as in Flood Zones 2 and 3a.

## **Employment**

The Mayor welcomes the locally specific approach to Haringey's proposed employment policies that seek to reinvigorate and intensify areas of employment, where required, in order for Haringey to provide sufficient floorspace to meet its employment projections set out in Table 1.1 of the London Plan. This objective should also be reflected in paragraph 7.35 so that not only housing potential is noted, but also an intensified employment offer, where appropriate. The Mayor also welcomes the sequential approach to the redevelopment of non-designated employment land to provide similarly lower value land uses such as community infrastructure.

## **Town centres and Retail**

The Mayor supports Haringey's aim to ensure vibrant high streets by managing the overconcentration of betting shops. He also supports the approach to limiting hot food take-away in order to address public health issues.

## **Tottenham Area Action Plan**

The Mayor strongly supports the thrust of the Area Action Plan (AAP) in terms of its vision and strategic objectives for Tottenham, and welcomes the progression of this plan since February 2015. The target to deliver 10,000 new homes across the AAP area over the plan period represents 67% of Haringey's London Plan housing target up to 2025. This level of ambition reflects Tottenham's status as one of the Mayor's Housing Zones, and is supported in line with London Plan Policy 3.3 and the objectives of the Upper Lee Valley Opportunity Area Planning Framework (OAPF). Moreover, having regard to the proposed housing numbers coming forward within strategic schemes in the area, the Mayor is satisfied that the AAP target is realistic and deliverable.

Further to comments made previously by the GLA, the Haringey Employment Land Study (2015) makes an important contribution to the Local Plan evidence base. For Tottenham, the Council has taken an approach to employment land management which carefully considers employment land characteristics and regenerative potential. In this regard the AAP appropriately safeguards Strategic Industrial Land, whilst proposing a number of changes to locally designated employment areas - with the intention of nurturing and retaining a diverse local employment base in Tottenham for the long-term, as well as supporting strategic objectives for regeneration through pragmatic revisions to the allocation of selected employment sites - where these are well placed to contribute towards urban renewal in accordance with the London Plan and Upper Lee Valley OAPF.

In strategic transport terms the AAP addresses various planned connectivity improvements through the area (including Crossrail 2 and capacity enhancements along the West Anglia Main Line), and recognises that these improvements contribute to the potential for future housing and economic growth in Tottenham. The Council is advised that the Mayor is considering potential mechanisms for capitalising on the value uplift from Crossrail 2 - so that this may be harnessed to support the delivery of this infrastructure, and/or other public benefits as appropriate. Moreover, the specific acknowledgement (at AAP area-wide and site specific level) of the need to support the delivery Crossrail 2 (including its land take), as well as the importance of making the most of the development opportunities it offers, is supported. A number of further detailed comments set out within Appendix 1 and 2.

## **Site Allocations DPD**

The Mayor notes that the Council has responded positively to the comments issued at preferred option stage, and the proposed refinements to designation boundaries and opportunity site

allocations are broadly supported in strategic planning terms. A number of further detail comments are set out within Appendix 1 and 3.

## **General matters**

The Council should note that the GLA intends to undertake a refresh of the Upper Lee Valley OAPF. This is particularly timely in the context of Crossrail 2, and is likely to provide an opportunity to identify additional housing capacity within the Opportunity Area. Clearly the role of the OAPF is to provide a strategic framework plan. However, as discussed in Appendix 2, GLA officers seek to ensure that key spatial diagrams coming forward locally in the Upper Lee Valley may be read clearly alongside each other (Appendix 4 illustrates the current situation). Accordingly, the Council is encouraged to engage particularly closely with neighbouring boroughs when working up key diagrams within the Proposed Submission Development Plan Documents. More generally, the GLA looks forward to facilitating further joint engagement between boroughs and other relevant stakeholders as part of the Upper Lee Valley OAPF review process.

If you would like to discuss any of these representations in more detail, please contact Celeste Giusti (020 7983 4811 / celeste.giusti@london.gov.uk) who will be happy to discuss and arrange a meeting.

Yours sincerely,



**Stewart Murray**  
**Assistant Director – Planning**

cc Joanne McCartney, London Assembly Constituency Member  
Nicky Gavron, Chair of London Assembly Planning Committee  
National Planning Casework Unit, DCLG  
Alex Williams, TfL

## Appendix 1: Comments from Transport for London

# Transport for London



**To:** Celeste Giusti

**From:** Tom Matheou

**Our Ref:** 16/0260

**Phone:** 020 3054 3649

**Date:** 29 February 2016

**RE: Haringey Local Plan Pre-Submission Public Consultation Strategic Policies, Development Management DPD, Site Allocation and Tottenham Area Action Plan TfL response**

TfL welcomes the opportunity to work with the Council to deliver aspirations for sustainable growth in the borough and specifically the Tottenham AAP area. .

TfL notes that Haringey Council have taken TfL's previous response to consultation and therefore welcomes the changes/recommendations that have already been taken into account. That said, a number of TfL's initial comments remain outstanding.

### **Alterations to the Strategic Policies (DPD) (adopted 2013)**

3.1.33 for the enhancement of Northumberland Park, the plan could refer to the work between TfL, Haringey and the GLA to develop proposals for White Hart Lane station.

### **Draft Development Management Policies (DPD): Pre-submission**

DM3 Public Realm - Advertisements – Welcome the reference in paragraph 2.16 – although the text should be corrected to "Transport for London Road Network" and the date of the TfL Streetscape Guidance is 2015 not 2009. . TfL has a set criteria of requirements that it imposes on advertisement on the Transport for London Road Network (TLRN), particularly illuminated/electronic signs. This requires a number of conditions to be imposed in order to mitigate any impact on safety/driver distraction, details of these can be provided if required

DM55 Regeneration and Masterplanning– the principle of Policy DM55 is welcomed. Within the context of Crossrail 2 it will be important to provide the necessary flexibility so that currently safeguarded land can, where appropriate change as a result of changing economic circumstances. Notwithstanding this, further flexibility may be required if full benefits from Crossrail 2 are to be realised. For example, the re-provision of existing employment facilities allowing for alternative development which capitalises on Crossrail 2 benefits and supports wider regeneration objectives to take place.

Paragraph 7.35 refers to the positive impact that Crossrail will have on accessibility in the borough. It is unclear whether this relates to Crossrail 2 (which is proposed to directly serve the borough) or

Crossrail (1), which will not. Should this relate to Crossrail 2; this should be made more explicit. The overall emphasis of this text is supported, although reference to maximising the transformative impacts of Crossrail 2 for development and regeneration should be referenced directly within policy DM55.

### **Draft Site Allocations (DPD): Pre-submission**

B2, B3 and B4 - TfL strongly supports the identification of these sites for development as this will assist with the regeneration of the Bruce Grove area and provide the impetus for transport improvements such as works to the A10 and the upgrade of Bruce Grove rail station

SA8 Station Road Offices - TfL would request that an additional bullet point is included stating: "any development on this site should be aware of the provision of a bus facility on the adjacent site."

SA45 Highgate Magistrates Court and Police Station - TfL would expect to see vehicle and servicing access located off the TLRN.

SA52 Pinkham Way - The Mayor of London has revealed further details to redesign a number of key road networks in the capital in order to unlock growth and make the capital a more attractive place to live and work in line with the Mayor's 2050 Infrastructure Plan and the recommendations of the Roads Task Force. One of these locations is the A406 in New Southgate, where decking or a mini-tunnel over this junction on the North Circular would unlock land for new homes and connect the area around the proposed Crossrail 2 station. TfL welcomes the ongoing discussions with Haringey (as well as Barnet and Enfield) Councils. As such we would suggest including a new bullet in the development guidelines of "TfL is investigating options for decking or a mini tunnel over this part of the North Circular Road as recommended by the Roads Task Force, which if progressed could change the development context for this site."

SA1 Indicative Crossrail 2 Areas - TfL and Crossrail 2 welcomes this overarching designation but note that it could benefit from being minor rewording to read 'Sites required for the construction and operation of Crossrail 2 will be protected as necessary'. The elements of the policy which seek to ensure that the potential of Crossrail 2 is maximised through development is also supported. In relation to specific allocations, Haringey Council should note the following:

- SA7 – the northern part of this site has been identified as being required as a worksite associated with a potential Crossrail 2 station at Wood Green.
- SA14 – as identified in the supporting text, part of this site has been identified as a worksite associated with a potential Crossrail 2 station at Turnpike Lane.
- SA16 – as identified in the supporting text, part of this site has been identified as a worksite associated with a potential Crossrail 2 station at Turnpike Lane.

### **Tottenham Area Action Plan – pre-submission version**

The extensive reference at an area-wide and site specific level to the need to support the development Crossrail 2 and its land take, as well as the need to maximise the opportunities it offers for the development if individual sites, is welcomed.

**London Borough of Haringey – Tottenham AAP (pre-submission stage)**  
**Appendix 2**

Representations from the Greater London Authority

Consultation period: 8 January to 4 March 2016

GLA Ref.	Issue/ Option para./page	London Plan Policy ref.	Representations
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**Tottenham AAP – pre-submission consultation**

**Chapter 1. Purpose and scope of the Tottenham AAP**

1.	Figure 1.4, Tottenham AAP key diagram	General	As discussed at a recent meeting, GLA officers encourage the Council to work up this figure into a simple and legible key diagram which identifies the primary growth areas and spatial objectives of the AAP. The Council is encouraged to engage with Enfield Council as part of this work, with a view to ensuring that key spatial diagrams coming forward locally in this part of the Upper Lee Valley may be read clearly alongside each other.
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**Chapter 4. Area-wide policies**

2.	Figure 4.1: Designated employment areas in Tottenham	Policies 2.17 and 4.4	As discussed at preferred option stage, GLA officers support the Council's revisions to a number of areas of employment land in Tottenham - which are intended to nurture and protect a diverse local employment base as well as support strategic objectives for mixed use regeneration in accordance with the London Plan and Upper Lee Valley OAPF.  Moreover, following recent discussions, GLA officers welcome the Council's confirmation that it intends to correct a clerical omission at Figure 4.1 - ensuring that the diagram properly identifies the Millmead Strategic Industrial Location at Tottenham Hale.
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**London Borough of Haringey – Site Allocations DPD (pre-submission stage)**  
**Appendix 3**

Representations from the Greater London Authority

Consultation period: 8 January to 4 March 2016

GLA Ref.	Issue/ Option para/page	London Plan Policy ref.	Representations
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**Haringey Site Allocations DPD – pre-submission consultation**

**Sites in the west of the borough**

1.	Sites in the west of the borough	Policy 7.17	The removal of the allocation (including residential use) for Hornsey Water Treatment Works (an area of Metropolitan Open Land) is supported. GLA officers nevertheless remain open to discussion on opportunities to improve east-west connections between Wood Green town centre and Alexandra Palace and Park.
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**Sites in the east of the borough**

2.	SA62: Broadwater Farm area	Various, especially policies 3.9, 3.14 and 7.17	Further to GLA representations at preferred option stage, the removal of Lordship Lane recreation ground (an area of Metropolitan Open Land) from this allocation is supported.
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