

Haringey Local Plan Soundness Self Assessment Statement



Alterations to the Strategic Policies DPD Development Management Policies DPD Site Allocations DPD Tottenham Area Action Plan DPD

Stage 1: Pre-Production

Key question	Evidence provided
Justified	
Participation	
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>Yes, engagement and consultation with interested parties was carried out throughout the production process.</p> <p>The following reports provide information on who was consulted, how they were invited to engage and comment, the comments received and how these were considered and informed each stage of the DPDs production:</p> <p>DMDPD Issues & Options Consultation Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd</p> <p>Site Allocations Reg 18 (2014) Consultation Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-site-allocations-dpd</p> <p>Tottenham AAP Reg 18 (2014) Consultation Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/tottenham-area-action-plan</p> <p>Alterations to the Strategic Policies Preferred Option Consultation Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-strategic-policies</p> <p>DM Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd</p>

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	<p>Site Allocations Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-site-allocations-dpd</p> <p>Tottenham AAP Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/tottenham-area-action-plan</p> <p>Alterations to the Strategic Policies Pre-Submission Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-strategic-policies</p> <p>DM Policies Pre-Submission Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd</p> <p>Site Allocations Pre-Submission Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-site-allocations-dpd</p> <p>AAP Pre-Submission Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/tottenham-area-action-plan</p>
Research/ fact finding	
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source of the evidence?</p> <p>4. How up to date and convincing is it?</p>	<p>The DPDs are considered to be justified by up-to-date evidence. Reference to the evidence base is made throughout the Pre-Submission DPDs: http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-evidence-base</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>In line with the London Plan, the DPDs assume that there would be continued growth (notably 1,502 houses per year will need to be provided) in the borough arising from London's continued development, and it is not envisaged that any external influences will impact on this. The DPDs are also based on National Planning Policy, and includes some flexibility to deal with changing trends and markets. Continued monitoring of the Strategy through the AMR will ensure that the policies are effective in delivering the Strategic Policies' Spatial Vision and Strategic objectives.</p> <p>Haringey's Evidence Base documents also make certain assumptions, which are justified in their methodologies.</p>

Key question	Evidence provided
Alternatives	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions between competing alternatives is it clear how and why these decisions were made?</p>	<p>The DPDs are led by the priorities and a vision set out in the adopted Strategic Policies 2013. The following Sustainability Appraisals show how they show the different options and alternatives at earlier stages of the DPDs preparation and explains how they were objectively assessed.</p> <p>Alterations to the Strategic Policies http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-strategic-policies</p> <p>DM Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd</p> <p>Site Allocations Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-site-allocations-dpd</p> <p>Tottenham AAP Issues and Options and Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/tottenham-area-action-plan</p> <p>The Sustainability Appraisals undertaken also show the different options and alternatives at earlier stages of the DPDs preparation and explains how they were objectively assessed.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>Yes – the DPDs were based on a Sustainability Scoping Report subject to external verification, which identified key sustainability objectives for the Borough.</p> <p>Alterations to the Strategic Policies http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-strategic-policies</p> <p>DM Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd</p> <p>Site Allocations Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-site-allocations-dpd</p> <p>Tottenham AAP Issues and Options and Preferred Option Report http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/tottenham-area-action-plan</p>

Key question	Evidence provided
	The Sustainability Appraisal also highlights how the policies perform against the sustainability objectives, and this information was used to inform the development of the DPDs
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>Yes. The DPDs expand on the Further Alterations to the London Plan 2015. Where appropriate, references have been made to the London Plan. The consultation reports set out the comments received from the Greater London Authority (GLA). All comments received have been considered in developing the plan to the submission stage. The GLA has issued a statement of conformity with the London Plan for each DPD. This regional context has been translated at the local level to reflect local issues, such as ensuring sufficient development sites are allocated to meet Haringey's growth projections.</p>

Effective	Evidence Provided
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>Haringey's Strategic Policies identify the key issues to be addressed in the Local Plan – as set out from paragraph 1.5.6.</p> <p>These stem from the Sustainable Community Strategy, and have been tested through previous consultations. These DPDs seek to implement the Strategic Policies' vision and objectives, but also, in the case of the Area Action Plan, provide further detail as to the objectives for this particular area of Haringey.</p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>Yes, these are set out in the Duty to Co-operate Statement regarding what has been done to ensure effective cross boundary working.</p> <p>Issues have also been considered through sub regional documents which have informed the preparation of the DPD policies.</p> <p>Key cross boundary projects identified include:</p> <ul style="list-style-type: none"> North London Waste Plan Upper Lee Valley Opportunity Area Highgate Neighbourhood Plan SHLAA Finsbury Park Town Centre SPD <p>Neighbouring Boroughs and organisations have been consulted as part of the DPDs development</p>

	process.
16. Does the development plan document contain clear objectives?	The DPDs seek to achieve the objectives of the adopted Strategic Policies. The Area Action Plan has a number of other objectives for the spatial management of growth in the Area. These objectives link in with the boroughs Spatial Vision set out in the Strategic Policies.
17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere? 18. Is there a direct relationship between the identified issues and the objectives?	The Objectives in each DPD stem from the Spatial Vision set out in the Core Strategy, which conform to the Vision and objectives of Haringey's Sustainable Community Strategy. The aims and objectives in each DPD are specific to the nature of the policies and allocations in each DPD and relate to the main issues facing the Borough, as set out in paragraph 1.4 of the AAP and Chapter 1 of the Site Allocations DPD, Development Management policies DPD, And Tottenham AAP.
19. Is it clear how the policies will meet the objectives? 20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?	The policies are informed by the objectives, and contain monitoring proposals which show how they will be achieved. The objectives stem from the vision, which itself stems from the SCS vision. There are no identified gaps with regards to the objectives.
21. Are there realistic timescales related to the objectives?	The objectives and aims of the DPDs have been developed to help contribute to the delivery of the Core Strategies polices. Each policy contains monitoring proposals to help aid in their delivery.
22. Are the policies internally consistent?	Yes, the policies are detailed development management policies, and so are quite focused in their nature. The Sustainability Appraisals have tested all the policies in the documents and has not identified any inconsistencies.
23. Does the development plan document contain material which: <ul style="list-style-type: none"> • is already in another plan • should be logically be in a different plan • should not be in a plan at all? 	The DPDs do not contain material already in another plan, should be in a different plan or should not be in a plan at all. The DPDs help implement the more spatial policies contained in the Core Strategy. The GLA has confirmed the DPDs are consistent with the London Plan, and so no unnecessary duplication of policies is contained in the documents. Detailed site allocations and policies relating to waste which are best dealt with sub regionally are the subject of a separate joint DPD. The LDS sets out the scope and content of these Development Plan Documents. It sets out the indicative scope and content for each DPD and they have been prepared with this in mind.
24. Does the development plan document explain how its key policy objectives will be achieved?	The policies, justifying text and Monitoring Targets clearly identify how the key objectives will be achieved.
25. If there are development	Yes, the Development Management Policies, as set out in Chapter 1 help to implement the Borough's

<p>management policies, are they supportive of the strategy and objectives?</p>	<p>spatial strategy as set out in the Strategic Policies.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been identified?</p>	<p>Yes. An Infrastructure Delivery Plan and CIL Charging Schedule exist to help implement the Plan. The Infrastructure Delivery Plan sets out the physical, social and other infrastructure requirements that are needed to deliver the levels of growth outlined in the documents.</p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>The Delivery mechanisms are set out in Chapter 6 of the AAP, Appendix B of the DM Policies DPD and within the accompanying text for each Site Allocation. Some specific Infrastructure requirements are also detailed where relevant in the DPDs.</p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>Yes, The Infrastructure Delivery Plan sets out the physical, social and other infrastructure requirements that are needed to deliver the levels of growth outlined in the documents. This forms part of the Evidence Base for the DPDs.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document? 30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>Yes, this is outlined in Relevant DMDPD Policies, through identification of ownership patterns on Site Allocations and Chapter 6 of the Tottenham AAP, and specifies the mechanisms for delivery. This is taken further by the Infrastructure Delivery Plan (IDP) as it sets out what infrastructure is considered essential to deliver the DPDs. Delivery organizations and possible sources of funding have been identified. The IDP was prepared with involvement and participation with the key delivery organisations. These organisations have also commented upon the DPDs through various stages of its production, and no significant objections have been received.</p>
<p>31. Does the development plan document reflect the concept of spatial planning? 32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from</p>	<p>Yes, policies in the AAP, DMDPD, and Site Allocations cater for a certain geographical area of the Borough with similar characteristics. The plan has also been prepared in accordance with national planning guidance on spatial planning including ensuring it reflects other plans and policies of delivery partners and organisations. The Development Management Policies are more detailed and specific, but clearly have a spatial nature where relevant, including sequential approaches to managing employment land and retail space. The overarching strategy of the AAP highlights the amount of growth and development the DPD will accommodate, and identifies the key sites for this, alongside the Site Allocations DPD for the rest of the</p>

<p>a variety of organisations that influence the nature of places and how they function?</p>	<p>Borough. All DPDs policies reference other guidance on strategies where relevant in the reasoned justifications.</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>Yes, national and regional policy changes are outside the Council's control, and the DPDs must be consistent with them. Therefore through the detailed monitoring arrangements, the plan can be assessed to take account of matters imposed by circumstances.</p>
<p>Flexible</p>	
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>The DPDs recognise that unforeseen circumstances may impact on growth and delivery. This will be monitored through the Council's AMR. The DPDs policies have also been designed to give flexibility, for example DM Policy 1, seeks to take a flexible design-based approach to determining planning consents. As suggested above, the document employs a plan, monitor and manage approach with the role of the AMR key to aiding in this process. The Infrastructure Delivery Plan which forms part of the evidence base for this strategy is classed as a live document, and will be updated as necessary.</p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<p>The DPDs recognise that unforeseen circumstances may impact on growth and delivery. This will be monitored through the Council's AMR. The London plan requires Haringey to deliver 1,502 homes per year to 2026. The GLA's Strategic Housing Land Availability Assessment to which Haringey contributed shows that Haringey has enough capacity to deliver these homes. This is monitored through the Authority Monitoring Report, and if delivery is failing, this will lead to a review of the policy approach.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<p>The AMR will monitor delivery against key monitoring targets contained in the DPDs relevant to each policy and will recommend necessary actions. Similarly, if monitoring proves that the policy is ineffective this will lead to a review of the policy.</p>
<p>Monitoring</p>	
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<p>Yes. There is an adopted monitoring framework in the Strategic Policies DPD.</p>
<p>38. Is it clear how these are to be measured and are these linked to the production of the annual</p>	<p>Yes, they are set in each DPD and relate to the policy objectives and will be used in future AMRs. Many of the indicators are present in current AMRs.</p>

monitoring report?	
39. Are suitable targets and indicators present (by when, how and by whom)?	Yes, indicators and targets are set out for each policy, to be monitored in the AMR.

National policy	
40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy? 41. If yes, is there a local justification?	No, the Council considers that the plan is consistent with the NPPF. The GLA has issued a statement of conformity with the London Plan.
42. Does the development plan document contain policies that do not add anything to existing national guidance? 43. If so, why have they been included?	No. National and regional policy is only referenced to provide context for policies.