

Schedule of Alterations to the Strategic Policies

Regulation 22(1)(c)(v) Statement of Consultation (Pre Submission)

1. Introduction

- 1.1 Pre-Submission consultation on the Schedule of Alterations to the Strategic Policies took place between 8th January and 4th March 2016. **Consultation was undertaken in accordance with the Council's** Statement of Community Involvement (2011) and in line with regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations require the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken on the Schedule of Alterations to the Strategic Policies at the Pre-Submission stage, a summary of the main issues raised in response to that consultation, and to detail the Council's response to comments made.

2. Summary of consultation undertaken on the Pre-Submission Schedule of Alterations to the Strategic Policies

- 2.1 On 23rd November 2015, **Haringey's Full Council endorsed the Pre-Submission** Schedule of Alterations to the Strategic Policies and resolved to publish the document for consultation for a period of eight weeks and, following consultation, submission to the Secretary of State for independent examination in public (see [here](#))
- 2.3 Formal notification of the Pre-Submission publication of the Schedule of Alterations to the Strategic Policies was given on 8th January 2016, and representations were invited for an eight week period ending 4th March 2016. Representations were also invited on the Sustainability Appraisal of the Schedule of Alterations to the Strategic Policies during this period.
- 2.4 A formal notice setting out the proposals matters and representations procedure was placed in the 'Haringey Independent' newspaper on both January 8th 2016 and January 15th 2016 (see **Appendix A**). In addition, on 8th January, a total of 1,582 notifications (see **Appendix B**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all appropriate general consultation bodies. Additionally 8,484 properties within Site Allocation boundaries were notified. Addresses outside Site Allocation boundaries were not notified directly, but site notices were placed outside sites. Enclosed with the letter was the Statement of the Representations Procedure (see **Appendix D**). **Those emailed were also provided with the web link to the documents on the Council's** Local Plan web pages. All specific consultation bodies (see **Appendix E**) were also notified on 8th January 2016. Unless otherwise requested by the consultation body, enclosed with the notification was a hard copy of the Pre- Submission Schedule of Alterations to the Strategic Policies and the Proposals Map, the Statement of the Representations Procedure, and the Sustainability Appraisal Report. In accordance with Regulation

21 of the Town and Country Planning (Local Planning) (England) Regulations 2012, a separate letter was also sent to the Mayor of London requesting his opinion on the conformity of the DPD with the London Plan 2015 (see **Appendix F**).

2.5 Hard copies of the Pre-Submission Schedule of Alterations to the Strategic Policies and the Proposals Map, the Sustainability Appraisal Report, the Statement of the Representations Procedure and the response form (see **Appendix G**) were made available at the Haringey Civic Centre, the Planning Reception at River Park House, and at all public libraries across the Borough. Additional copies of the Pre-Submission Schedule of Alterations to the Strategic Policies were also made available at the libraries for short term loan. The documents **were also made available to view and download from the LDF web pages of the Council’s website**. The response form was made available on the Council’s website for downloading or could be completed and submitted online. **Council’s Facebook and Twitter were also used to advertise the consultation and the dates of the drop-in events held during the consultation period:**

Library	Drop In Date and Time
St Anns’s	Monday 18 th January 4 – 7pm
Highgate	Tuesday 19 th January 2 – 5pm
Wood Green	Thursday 21 st January 11am – 2pm
Alexandra Park	Tuesday 26 th January 1- 4pm
Coombes Croft	Wednesday 27 th January 3 – 6pm
Muswell Hill	Thursday 28 th January 4 – 7pm
Stroud Green	Thursday 4 th February 3 – 6pm
Hornsey	Tuesday 2 nd February 3 – 6pm
Wood Green	Thursday 25 th February 4 – 7pm
Tottenham town hall	Tues 9th Feb - 6. 30-8. 30pm
639 High Road Tottenham	Monday 15th Feb - 6. 30-8. 30pm
Ferry Lane Primary school	Tues 16th Feb - 6. 30-8. 30pm
Northumberland Park Residents Association	Wed 2 nd March
Dowsett Estates RA	26 th January

2.6 A week prior to the close of consultation a reminder e-mail was sent out to those on the LDF consultation database to remind online consultees of the closing date for making their comments.

3. Duty to Cooperate

- 3.1 Section 110 of the Localism Act inserts section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed.
- 3.2 The other persons prescribed are those identified in regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:
- (a) the Environment Agency;
 - (b) the Historic Buildings and Monuments Commission for England (known as Historic England);
 - (c) Natural England;
 - (d) the Mayor of London;
 - (e) the Civil Aviation Authority;
 - (f) the Homes and Communities Agency;
 - (g) each CCG;
 - (h) the Office of Rail Regulation;
 - (i) Transport for London;
 - (j) each Integrated Transport Authority;
 - (k) each highway authority and
 - (l) the Marine Management Organisation.
- 3.3 The duty imposed to co-operate requires each person, including a local planning authority, to:
- (a) engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
 - (b) have regard to activities of the persons or bodies (above) so far as they are relevant to activities within subsection (3).
- 3.4 The relevant activities listed under subsection (3) comprises the preparation of development plan documents/local development documents, and activities which prepare the way for and which support the preparation of development plan documents, so far as relating to a strategic matter.
- 3.5 The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Local Plan, including the Schedule of Alterations to the Strategic Policies and the Proposals Map, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out below.

Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How we Cooperated	Outcomes
<p>Neighbouring authorities (see map 1)</p>	<p>Letters sent inviting representations on the DPD at both stages of preparation and responses received. (See Consultation Statements)</p> <p>Planning Officer meetings with:</p> <ul style="list-style-type: none"> • Camden: 19 September 2014, 15 June 2015, 13 May 2014, 26 February 2016 • Barnet: 22 September 2014 • Islington: 19 September 2014 • Waltham Forest: 25 September 2014 • Hackney: 8 October 2014, 6 April 2016 <p>ALBPO Meetings</p> <ul style="list-style-type: none"> • 24 November 2015 • 22 October 2015 • 31 March 2015 • 28 November 2013 • 6 February 2013 	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements</p> <p>Cross boundary issues identified included:</p> <p>Enfield/Barnet: Pinkham Way (partly in Barnet ownership) and potential Opportunity Area at New Southgate, with outcome seeking to keep future options open for wider comprehensive development – TfL also engaged in such discussions. More recently, preparation of joint statement on the importance of this spur of the Crossrail 2 project remaining in the initial funding bid to Treasury.</p> <p>Hackney – South Tottenham Residential Extensions SPD and the potential to prepare a joint SPD at point of next review. Agreement to work on the issue/ concept of warehouse living and access to and through the Harringay Warehouse District.</p> <p>Enfield – relationship between Meridian Water's development and North Tottenham – agreement over sharing of infrastructure requirements and joint provision cross boundary to avoid duplication.</p> <p>Camden – joint response to the Highgate Neighbourhood Plan ensuring consistency of view from the two LPAs</p> <p>Waltham Forest, Enfield & Hackney: Work on the jointly produced (with GLA) Upper Lee Valley</p>

		<p>Opportunity Area Framework (OAPF) and OAPF District Infrastructure Funding Strategy</p> <p>Updates given by respective Borough's on Local Plan progress at All London Borough Planning Officer Group and any cross boundary issues raised. Meetings last held in March - April and are scheduled for every quarter.</p> <p>Hackney & Islington: Joint progression of the Finsbury Park Town Centre SPD.</p>
Environment Agency	<p>Letters inviting representations on the Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Meetings at Council offices:</p> <ul style="list-style-type: none"> • 1 April 2014, 7 July 2014 	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Key area of discussion was regarding sequential testing of proposed development sites in Tottenham. EA provide flood mapping for the Borough. Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>
Historic England	<p>Letters inviting representations on Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Written communications between the Council and Historic England</p> <p>Early engagement in seeking view of Historic England on the heritage policies sent before formal consultation.</p> <p>Meetings at Council offices</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Advice on Heritage and Conservation policies given. Heritage policies amended in light of specialist advice. Funding from HE to assist in preparing up to date CAAMs for the six Conservation Areas in Tottenham with focus on ensuring heritage conservation and the regeneration proposals are better integrated. Further HE funding for completion of the Noel Park CAAM, which is part in and adjoins the Wood Green AAP area.</p> <p>Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>

Natural England	Letters inviting representations on all Development Plan Documents and responses received. Engagement on SA	Details of representations received and the Council's actions as a result are detailed in the Consultation Statements. Comments received and taken on board on the SA scoping and, in later iterations, the assessment of effects on natural habitats. Assistance with Habitats Regulations Assessment ensuring compliance with relevant EU Directives.
Greater London Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Meetings with Haringey assigned Officer from the GLA to discuss strategic fit of emerging policies GLA Housing Study meetings and work Liaison with specialist officers for policy development regarding affordable housing and sustainability in light of changes to Lifetime Homes etc and London Plan alterations GLA represented on governance boards for the Tottenham housing zone's and the Wood Green AAP . Current engagement on Crossrail 2 spur serving Wood Green. Submitted responses to the Further Alterations to the London Plan consultation.	Details of representations received and the Council's actions as a result are detailed in the Consultation Statements. Officer advice on policy development to ensure there are no conflicts with the strategic London Plan – especially release of industrial land, affordable housing provision and meeting strategic housing requirements. Participation in the London wide SHLAA and SHMA evidence base studies – most recently the call for sites. Agreement to methodology for surveys on Town Centre Health Checks to take place mid-2016. Discussions held, advice, and funding agreed for tall buildings policy work, including the acquisition of 3D model and zmapping. GLA input into brief and commitment to further involvement on subsequent Tall Buildings and Views SPD. Housing Zone confirmed for Tottenham and ongoing work regarding implementation of development schemes in accordance with agreed DCS and High Road West masterplans – including GLA assistance on procurement process for delivery vehicle.
Civil Aviation Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received are provided in the Consultation Statement. No major issues raised. Further engagement likely to be required on the Tall Buildings and Views SPD, which sets upper

		parameters for tall buildings within growth areas.
Haringey Clinical Commissioning Group (CCG)	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Infrastructure Delivery meetings and correspondence.	Details of representations received and the Council's actions as a result are detailed above. Consulted on evidence base documents, and provided information to inform future service delivery, including 'deep dive' for North Tottenham, Tottenham Hale, Green Lanes and Wood Green areas , resulting in floorspace figures for new provision for CCG to take forward to capital bid stage. Continued engagement on healthcare requirements/priorities being reflected in local plan policies, including those that address obesity and mental health.
Homes and Communities Agency	Letters inviting representations on all Development Plan Documents	Details of representations received are provided in the Consultation Statement. No major issues raised
Highways Agency/ Highways England	Letters inviting representations on all Development Plan Documents and responses received.	Details of representations received are provided in the Consultation Statement. No major issues raised
Transport for London	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Quarterly 1:1 meetings to discuss all transport related matters. Liaison with TfL regarding transport study modelling and findings Infrastructure Delivery. Meetings and correspondence on specific transport projects. Meetings on Crossrail 2 proposals Engagement on DCF for the Upper Lee Valley OAPF.	Details of representations received and the Council's actions as a result are detailed in the Consultation Statement. Agreed the methodology for transport modelling of broad growth assumptions, and the results of the findings of the study, using TFL data. Consulted on evidence base documents, and provided information to inform future infrastructure provision in particular around Tottenham, including the Station overdevelopment, Bus station Improvements, STAR, cycle superhighway, White Hart Lane station improvements, and Crossrail2. Further engagement on Crossrail 2 following Council's proposal for a single station serving Wood Green, extension to New Southgate, and subsequently, Growth Commissions recommendation that spur be delayed.

		Confirmation of population projections and sites informing infrastructure provision across the Lee Valley OAPF area, in recognition of refresh.
Office of Rail Regulation	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received are provided in the Consultation Statement. No major issues raised.

4. Who responded and number of representations received

- 4.1 There were 27 representations received to the Pre-Submission consultation on the Schedule of Alterations to the Strategic Policies. These came from developers and agents (11), local interest groups (2), public bodies (7), and local residents and individuals (7). **Appendix H** provides a full list of the respondents. In total, 70 individual comments were made that were considered and responded to by the Council. These are provided by Respondent order at **Appendix I** and by Alternation order (grouped by relevant chapters in the Strategic Policies DPD) at **Appendix J**.
- 4.2 Alongside the Alterations, a draft of the Proposals Map was also provided and the Council received 4 comments on this draft. The list of respondents to the Proposals Map is provided at **Appendix K**, while the individual comments made and responded to by the Council are set out at **Appendix L**. **It should be noted that the Proposals Map itself is not a Development Plan Document and is therefore not subject to Examination.** However, the Council recognises that the Map illustrates the spatial planning policies of the Local Plan, and therefore it is important to get this correct. We have therefore had regard to the comments received and are proposing changes in response to these as set out in the appendix to the Minor Modifications to the DPDs.

5. Summary of the main issues/comments raised to the Schedule of Alterations to the Strategic Policies Pre-Submission consultation

- 5.1 Regulation 22(1)(c)(v) requires a summary of the main issues raised in representations made to the pre-submission Schedule of Alterations to the Strategic Policies and the Proposals Map. Pursuant to this requirement, the following paragraphs set out the main issues raised in respect of the proposed alterations, grouped by the relevant chapter within the Strategic Policies DPD, and to the Proposals Map.

General

5.2 Officers of the Greater London Authority (GLA) advised that the Mayor of London is content that the Pre-Submission Alterations to the Strategic Policies are in general conformity with the London Plan (2015). A number of specific representations were made by the GLA on matters of clarity and detail and these have been considered and wherever possible addressed as proposed minor modifications, noting **that the GLA's representation was received after the publication closing date** and is therefore included as a late representation.

Alterations to the whole document (Alt 1-2)

5.3 No comments received

Sections 1.1-1.6, Introduction (Alt 3-27)

5.4 Comments received to this section from the development sector, sought to have all references to strategic housing figures expressed as minimums. However, the Council considers that this is already adequately provided for in Policy SP1 which sets out that the Council will "maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802 homes". The Council also notes that the GLA have not sought this in their representation.

5.5 A resident raised concerns with the fact that the need for affordable housing outstrips supply (Alt25), which suggested that the borough-wide target for affordable housing provision should be re-**set to at least the current 50% in SP2. Council's** response is that the strategic borough-wide affordable housing target must reflect current evidence on viability, which only supports a maximum target of 40%. They also raised concerns with the reliance on a small number of large house builders, and therein a lack of alternative ways of delivering new housing. The Council considers that the Plan promote delivery of housing from a wide range of suitable sources, including small and medium sized development, conversions in appropriate locations and circumstances, self and custom build, and appropriate infills.

Section 2.1, Haringey's Spatial Strategy (Alt 28)

5.6 One representation received that notes the housing supply figure proposed through the allocations and the proposed tenure split for affordable housing, and requests further engagement on this as a cross boundary issue as the neighbouring borough commences a review of their own Local Plan.

Section 3, SP1: Managing Growth (Alt 29-44, 102 and 104)

5.7 There was general support from the development sector for the continued role of Wood Green/Haringey Heartlands as a Growth Area. The main objections were to Alt35, and therein, the expectation that new jobs will be delivered through the reconfiguration of existing employment sites away from industrial and warehousing use to mixed use providing more intensive employment/business use. The comments suggested that it was not appropriate for all existing employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability. In response, the Council reiterated that the presumption is, that as Haringey is an inner London borough with generally good PTAL levels, that more, not

less, intensive employment outcomes will be expected on existing employment sites, especially Regeneration Area sites. This approach is consistent with evidence and the need to meet the Council's employment target.

Section 3, SP2: Housing (Alt 45-65)

5.8 The Alternations to SP2 drew the most comments. The primary issue raised by residents was the reduction in the strategic borough-wide target for affordable housing provision and the alternation to the affordable housing tenure split. It was considered that these alterations meant that the Plan failed to meet the full objectively assessed needs for market and affordable housing, especially genuinely affordable housing, which for many low-income Haringey residents is social rented housing. Conversely, the comments received from the development sector supported the reduction in the affordable housing target, with some suggesting this should be reduced to 30% in **Wood Green based on viability. The Council's response is that the strategic** affordable housing target must be set having regard to borough-wide development viability, and that the current up to date evidence base supports a 40% borough-wide target from all sources.

5.9 Representations also queried the alternations for the renewal and improvement of council housing estates, in particular, alternative options for improving the estates, such as refurbishment, and the need to provide details for re-housing those living on these estates. **Council's response is that the estates identified** are those where refurbishment is not financially feasible or there is significant opportunity to achieve an uplift in housing numbers alongside renewal of the existing stock. Overall, only a small portion of estates are proposed for renewal or improvement, **with the vast majority of the remaining estates being refurbished through Haringey's Decent Homes Programme.** With respect to decant and the re-housing offer to be provided to existing tenants and leaseholders, these are matters for Council's Housing Strategy.

5.10 A concern was raised by two respondents that the overall scale of housing growth for the Borough and, in particular, for Tottenham were unsustainable and had significant implications for existing and future social infrastructure. **Council's response is that the scale of development is that required to meet Haringey's housing requirements and the provision of social and physical infrastructure** would need to match the pace of planned growth. The requirements for the infrastructure needed are set out in the Haringey Infrastructure Delivery Plan, which is a live document and subject to regular review and updating.

Section 3, SP3: Provision of land for gypsies and travellers (Alt 66)

5.11 No comments received

Section 4, SP6: Waste and recycling (Alt67-69)

5.12 No comments received

Section 5, SP8: Employment (Alt70-79 and 110)

- 5.13 The representation of Our Tottenham queries the robustness of the Employment Land Review 2015 and opposes Alt71 which decreases the forecast demand for new employment floorspace, and Alt72 which changes the employment designation categorisation applying to **a number of industrial or business estates. The Council's response is that the Employment Land Review was undertaken by a reputable consultancy with a track record of preparing ELRs. The reduction in the projected demand and the re-classification of some of the designations, accords with the findings of this up to date evidence base.**
- 5.14 Other respondents queried the level of protection to be given to non-designated employment site arguing that the approach does not accord with the NPPF to release redundant employment land for other uses. **Council's response is that both designated and non-designated sites are required to contribute to meeting Haringey's jobs need/target.**

Section 8, SP17: Delivering and monitoring the Local Plan: Strategic Policies (Alt80-89)

5.15 No comments received

Appendix 2: Housing trajectory (Alt90)

5.16 No comments received

Appendix 3: Monitoring Targets and Indicators (Alt91-101, 103, 107 and 109)

5.17 No comments received

Alt102 (see Section 3.1, SP1: Managing Growth)

5.18 No comments received

Alt104 (see Section 3.1, SP1: Managing Growth)

5.19 No comments received

Appendix 5: Glossary of Terms (Alt 105 and 106)

5.20 No comments received

Alt110 (see Section 5.1, SP8: Employment)

5.21 A comment received from the GLA requested commentary on the amount of designated employment land to be released. Council note this but do not recognise the need to include this in the Strategic Policy.

Alt 111 (see Section 6.3, SP13: Open Space and Biodiversity)

5.22 No comments received

Proposals Map – NB: This is not a DPD and is not subject to Examination

5.23 Three of the four responses, were almost identical and requested the Council define the exact boundaries of the Parkland Walk which has been the subject of change over many years in ownership and land-use. **Council's response was that it did not have the evidence** needed to alter the extant boundary but that this would be picked up in the Revised Open Spaces Study, which is programmed to commence in 2017. The other response was from the Highgate Society querying the illustration of an archaeological area and SINC site in Highgate. A lack of clarity over the former and the fact the SINC was shown on the map, led the Council to conclude that no amendments were needed.

Consequential Changes

5.24 It should be noted that the proposed minor modifications arising from the representations to other DPDs necessitates consequential changes to certain parts of the Proposals Map. There are also a number of changes that pick up on typographical errors or areas where additional information could provide more clarity or help with orientation.

Appendix A – Notice placed in the local newspaper on both the 8th and 15th January 2016

thetottenhamindependent.co.uk

TO ADVERTISE: 01923 216232
Email: classifiedads@london.newsquest.co.uk

HARINGEY LOCAL PLAN PUBLIC NOTICE
Planning and Compulsory Purchase Act 2004
The Town and Country Planning (Local Planning) (England) Regulations 2012
Publication of a Local Plan (Regulation 19) Haringey's Local Plan documents:
Alterations to Strategic Policies; Development Management DPD
(Pre-submission); Site Allocations DPD (Pre-submission); and
Tottenham Area Action Plan (Pre-submission)

Haringey Council has prepared the proposed submission versions of the above Development Plan Documents (DPDs), which form Haringey's Local Plan to guide planning and development in the borough up to 2026 and beyond. The Strategic Policies (adopted 2013) is subject to a partial review to take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies. The Development Management DPD contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. The Site Allocations DPD identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified needs for housing, jobs, and the delivery of required infrastructure. The Tottenham Area Action Plan sets out relevant policies, proposals and site allocations for future development within the Tottenham area. The DPDs are accompanied by a Sustainability Appraisal, Habitats Assessment and an Equalities Impact Assessment.

Inspection of documents
The Council is inviting representations on the above DPDs and the accompanying documents. They are available for inspection from **Friday 8th January to Friday 4th March 2016**:

- at all Haringey libraries (during normal opening hours);
- at the Civic Centre, Wood Green N22 8LE;
- at the Planning Service, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ; and
- on line at www.haringey.gov.uk/localplan

Representation procedure
The DPDs are being published in order for representations to be made prior to the documents being submitted to the Secretary of State for examination in public. Representations received during this pre-submission consultation will be considered alongside the submitted DPDs by an independent Planning Inspector. The purpose of the examination is to consider whether the DPDs comply with legal requirements and are 'sound' against the test of soundness prescribed by the Government in the National Planning Policy Framework (2012). To be 'sound' the DPDs must be positively prepared, justified, effective and consistent with national planning policy and in general conformity with the London Plan (2015). Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public. All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by 5pm on **Friday 4th March 2016**. Representations may be made by any of the following means:

- the online response form at www.haringey.gov.uk/localplan
- by email at ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further information
For enquiries, email ldf@haringey.gov.uk or contact the Planning Policy Team on 020 8488 1478 or at the above address.
Dated 6th January 2016

January 15, 2016 25

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Dated 6th January 2016

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Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public.

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- by email at: ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further information

For enquiries, email ldf@haringey.gov.uk or contact the Planning Policy Team on 020 8489 1479 or at the above address.
Dated 6th January 2016

Appendix B – Notification Letter sent to all Consultees on the Council’s LDF Consultation Database

Date: 6th January 2016

Contact: Planning Policy Team

Direct dial: 020 8489 1479

Email: ldf@haringey.gov.uk

Dear Sir/Madam,

Haringey Local Plan Pre-Submission Public Consultation 8th January2015- 4th March2016

Haringey Council is now consulting on the final drafts of four Development Plan Documents (DPD), which make up Haringey’s Local Plan. These include:

- Alterations to the Strategic Policies;
- Development Management Policies;
- Site Allocations; and
- Tottenham Area Action Plan

These documents have been prepared in response to the previous consultation in February/March 2015; and earlier consultations on the Development Management Policies in 2013; and the Site Allocations and Tottenham Area Action Plan in 2014. We are now seeking your views on the final drafts of the above plans.

The Strategic Policies (adopted 2013) set out the Council’s **spatial strategy for how Haringey will develop and grow over the period to 2026**. The partial review of the policies take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies.

The Development Management Policies contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. Once adopted, the policies will replace those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified growth needs/targets set out in the Strategic Policies DPD, including those for housing, jobs, and the delivery of required infrastructure. It also establishes specific site requirements against which planning applications will be considered.

The Tottenham Area Action Plan sets out policies, proposals and site allocations for future development within the Tottenham area, based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

A Local Plan Policies Map has also been produced to graphically represent the planning designations and policies contained in the four DPDs.

Following this consultation, the documents along with the consultation responses will be submitted to the Secretary of State for independent examination.

Please find enclosed a Statement of Representations Procedure, which provides details of how you can provide your comments on the documents, all of which are available to view at www.haringey.gov.uk/local-plan ; and in hard copies at all public libraries, Planning Service offices, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ, and the Civic Centre, Wood Green N22 8LE.

Please provide us with your comments via:

- The online response form at <http://haringey.gov.uk/localplan>
- by email at: ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Comments must be received by 5pm on Friday 4th March 2016.

Comments may be made in support of the policy documents, as well as in objection. However, at this stage of the Local Plan's production it is required that your comments focus on the legal compliance and soundness of the documents. Details of what constitutes legal compliance and soundness can be found in the Statement of Representation Procedures attached. In addition, the Sustainability Appraisal and supporting evidence base are available to view and download from the Council's website: www.haringey.gov.uk/localplan.

Next Stages

Following the end of the consultation period, copies of all responses received will be sent to the Planning Inspectorate for consideration alongside the documents, together with a **summary of the key issues, including the Council's responses to the points raised.**

The Council anticipates that the Examination in Public will take place in summer 2016. We will regularly update our website www.haringey.gov.uk/localplan with information about this. If you would like to find out more about the Local Plan you can call the Planning Policy team on 020 8489 1479 or email us at ldf@haringey.gov.uk.

Yours faithfully,

Stephen Kelly

Stephen Kelly, Assistant Director, Planning

Appendix C – List of contacts on the Council’s LDF Consultation Database

Lynne Zilkha	Elizabeth Sutton-Klein	Cllr Mallett Antonia	Cllr Christophides Joanna	Cllr Adamou Gina
Jasper Woodcock	Henriette Stuchtey	Cllr Mann Jennifer	Cllr Connor Pippa	Cllr Adje Charles
Heather Wood	Celeste Menich	Cllr Marshall Denise	Cllr Demirci Ali	Cllr Ahmet Peray
Kitty Wong	Margaret Stoves	Cllr McNamara Stuart	Cllr Diakides Isidoros	Cllr Akwasi-Ayisi Eugene
John Wise	Kevin Stanfield	Cllr McShane Liz	Cllr Doron Natan	Cllr Amin Kaushika
Teresa Wing	Michael Edwards	Cllr Meehan George	Cllr Ejiofor Joseph	Cllr Arthur Jason
Carolyn Whitehead	Evelyn Ryan	Cllr Morris Liz	Cllr Elliott Sarah	Cllr Basu Dhiren
Edward Webb	Tara Ryan	Cllr Morton Peter	Cllr Engert Gail	Cllr Beacham David
Julia Warburton	Nicholas Rusz	Cllr Newton Martin	Cllr Gallagher Tim	Cllr Berryman Patrick
Jonathan Vellapah	Joyce Rosser	Cllr Opoku Felicia	Cllr Goldberg Joe	Cllr Bevan John
Nick Triviais	Jeff Rollings	Cllr Ozbek Ali Gul	Cllr Griffith Eddie	Cllr Blake Barbara
Max Tomlinson	Chris Roberts	Cllr Patterson James	Cllr Gunes Makbule	Cllr Blake Mark
Joey Toller	Lorna Reith	Cllr Peacock Sheila	Cllr Hare Bob	Cllr Bull Clare
Jane Thompson	Barry Rawlings	Cllr Reith Lorna	Cllr Hearn Kirsten	Cllr Bull Gideon
Rachel Tedesco	Kimberley Pyper	Cllr Rice Reg	Cllr Ibrahim Emine	Cllr Carroll Vincent
Alison Taylor-Smith	Annabruna Poli	Cllr Ross Viv	Cllr Jogee Adam	Cllr Carter Clive
Simon Miller	Karl-Dirk Plutz	Cllr Ryan James	Cllr Kober Claire	Cllr Sahota Raj
Richard Perry	Chris McNamara	Gabrielle Kagan	Alexander Elliot Ltd	Cllr Stennett Anne
Andrew Papadopoulos	Louise McNamara	Petal Caddu	Alexandra Mansions Tenants Association	Cllr Strickland Alan
Pavel Pachovský	Peter McNamara	Francois Joubert	Adult Literature Group	Cllr Vanier Bernice
Christopher Owen	Richard Max	Nick Jenkins	African Caribbean Association	Cllr Waters Ann
Stephen Overell	Kim Mason	Tony Hopkins	African Cultural Voluntary Organisation	Cllr Weston Elin
Gerrit Ormel	Colin Marr	Marian Hone	African Women's Welfare Group	David Lammy MP
Christian Ogilvie-Browne	Jason MacKay	Elaine & Ben Holgado	Africans & Descendants Counselling Services Ltd	Lynne Featherstone MP
Juliet Oerton	Stephen Lubell	Susie Holden	Age UK	A Anva Ltd

Carol Norton	John Long	Michael Herbert	Agudas Israel	A P T Consulting
Joseph Nicholas	Alison Lister	Frances Heigham	AH Architects	A S Z Partners Ltd
Ollie. Natelson	Barry and Louise Lewis	Claudia Hawkins	Air Transport Users Council	A. E. Butler & Partners
Jill Naeem	Rebecca Lellis Ferreira	Lauritz Hansen-Bay	Aitch Group	A.C.H. Turkish Speaking Pensioners Club
Eleni Murphy	Ethan Lazell	Paul Hancock	AJ Architects	Abbeyfield (North London) Society
Dave Morris	Charlie Kronick	Laura and Marcus Graham	Alan Cox Associates	Abbeyfield Society
Said Moridi	Heather Kinnersley	Marcos Godinho	Albany & Culross Close Residents Association	ACHE (Action for Crouch End & Hornsey Environment)
Faye Morgan	Angie Kikkides	Joe Friedman	Avenue Mews Tenants Association	Alexandra Palace Action Group
Mary Mitchell	Hannah French	Tinu Cornish	Aztech Architecture Ltd	Alexandra Palace Residents Association
Elaine Graham	Paul Brown	Lucia Brusati	Bahai Community	
Sean Fewlass	Stephen Brice	Tim Brierley	Bangladesh Muslim Organisation	Alexandra Park/Grove Lodge Meadow Allotments
Carla Ferrarello	Jill Bowden	Arthur Leigh	Bangladeshi Cultural Society	Alexandra Primary School
Pasco Fearon	Tim Blake	Beatrice Hyams	Bangladeshi Women's Association	Alexandra Residents Association
Cindy Evans	Anna Blackburn	Valerie Rose Berry	Baptist Church	Alexandra Tenants Association Group
Sue Ettinger	Matthias Bauss	Bill Temple-Pediani	Barnet, Enfield and Haringey Health Authority	Allenson House Medical Centre
Chris Elser	Frances Basham	Laura Forrest-Hay	Bashkal & Associates	Ally Pally Allotment Society
Kieron Edwards	Miles Attenborough	Sarah Lane	Bedford Road Tenants Association	Al-Rasheed Dauda Architect
Johnny Dixon	James Athanassiou	Elizabeth Gray	Belcher Hall Associates	Altaras Architecture

Angharad Davies	Ruth Antoniadis	Nicola Venning	Bell Residents Association	Anatolitis Associates
Felipe Da Rocha	Paulette Amadi	Panos Nicolaidis	Belmont Infant & Junior School	Ancient Monuments Society
Ruth Cowan	Linda Alliston	Poppy Rose	Bethel United Church of Jesus Christ	Andrew Kellock Architects
Stephen Cook	Andreas Adamides	Christopher Chadwick	Bhagwati Sai Culture & Social Centre	Andrew Mulroy Architects Ltd
Kenneth Connelly	Leila Sifri	Barry James	Bibles Christian's Assembly	Anglo Asian Women's Association
Anastasia Christofis	Eliza Kaczynska-Nay	Bob Maltz	Bicknell Associates Chartered Architects	Apcar Smith Planning
David Burrowes MP	Cynthia Jenkins	Flavio Poli	ASRA (GLHA)	Arbours Association
Paul Bumstead	Robert Franks	Selina & Dan Egerton	Aspire Design & Survey Ltd	Architectural Heritage Fund
Reuben Payne	Elizabeth Barnett	Broadwater Farm Community Health Centre	Blitzgold Ltd	Architectyourhome-Highgate
Hannah Redler Hawes	Angela Rossi Carter	Broadwater Farm Residents Association	Born Again Evangelistic	Archi-Tone Ltd
John Murray	Tony Baker	Broadwater Residents Association	Bostall Architecture Services	Archway Road Residents Association
Christine King	Gordon Forbes	Brown & Co (Surveyors) Ltd	Bounds Green & District Residents Association	Archway Road Tenants Association
Jon Brooks	Huub Nieuwstadt	Bruce Castle Village Residents Association	Bounds Green Group Practice	Archway Road Tenants Association
Chris Warburton	Bill Nottage	Brunswick Park Health Centre	Bounds Green Health Centre	ARHAG Housing Association
David Lichtenstein	Frederick Limbaya	Buckingham Lodge Residents Association	Bounds Green Infant & Junior School	Arnold Road Residents Association
Nick Oparvar	Feolezico Calboli	Building Design Consultants	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Arnos Grove Medical Centre
Ruth Ortiz	Sue Penny	CA (UK) Ltd	Bowes Park Community Association	Arta Architectural
Ursula Riniker	J N Douglas	CAAC Highgate	Bowes Park Community	Ashdown Court Residents

			Association	Association
David Baker	David Rennie	CABE	Bracknell Close/Winkfield Road Residents Association	Asian Carers Support Group
Michele Eastmond	Steve Roe	Campbell Court Residents Association	Brendan Woods Architects	Asian Community Centre
Chris Mayled	Katy Andrews	Campsbourne Baptist Church	Bridge House Health Care Centre	Asian Community Group
Jeremy Munday	Sophie Cattell	Campsbourne Centre	Briffa Phillips Architects	Asian Family Group
Nicholas Embling	Capital Architecture Ltd	Campsbourne Infant School	Britannia Hindu Temple Trust	Broadwater Farm Community Centre
Andrew Tiffney	Calvary Church of God in Christ	Chestnut Area Residents Association (CARA)	Client Design Services Ltd	Crawford Partnership
Carolyn Squire	Carr Gomm Society	Chestnut Northside Residents Association	Clyde Area Residents Association	Crouch End open Space (CREOS)
Corporation of London	Carter Surveying Associates	Chestnuts Community Centre	Coldfall Community Centre	CRH Tenants Association
London Borough of Haringey	Caryatid Architects	Chinese Community Centre	Coldfall Primary School	Cromwell Avenue Residents Association
London Borough of Sutton Planning and Transportation	Casa de la Salud Hispano Americana CASAHA	Chomley & Causton Residents Association	Coleraine Park Primary School	Crouch End Dental Practice
London Borough of Redbridge	CASCH	Christ Apostolic Church Kingswell	Collage Arts	Crouch End Health Centre
London Borough of Brent Planning Services	Charlton House Medical Centre	Christ Church	Commerce Road Tenants Association	Crouch End Health Centre
London Borough of Barking & Dagenham	Cherry Tree House Residents	Christchurch West Green	Community Action Sport	Crouch End Traders Association
London Borough of Barnet Planning Department	CASE	Christopher Wickham Associates	Community Church of God	Crouch End URC Church
London Borough of Bexley	Causeway Irish	Church Commissioners	Community Gay & Lesbian Association	Crouch Hall Road Surgery
London Borough of	CB Architects	Church Crescent	Community Response	Crowland Primary School

Croydon		Residents Association	Unit	
London Borough of Enfield	Cemex (UK) Operation Ltd	Crammond Browne Architects	Community Safety Unit	Cube Building Consultancy
London Borough of Hammersmith and Fulham	Central & Cecil	Circle 33 Home Ownership Ltd	Confederation of British Industry	CUE
London Borough of Harrow	Centre for Accessible Environments	Circle 33 Housing Group	Co-op Homes	CUFOS Community Centre
London Borough of Hillingdon	Charisma Baptist Church	Clark Designs Ltd	Coppetts Residents Association	Cypriot Centre
London Borough of Hounslow	Albany & Culross Close Residents Association	Clarke Desai Ltd	Corporation of London	Cypriot Women's League
RB Kensington & Chelsea	Alexandra Mansions Tenants Association	Claudio Novello Architects	Council for British Archaeology	Cyprus Turkey Democratic Association
RB Kingston upon Thames	Alexandra Palace Action Group	Cherry Tree House Residents	Edgcott Grove Residents Association	D R M Associates
London Borough of Lambeth	Alexandra Palace Residents Association	Chestnut Area Residents Association (CARA)	Eldon Road Baptist Church	DASH
London Borough of Lewisham	Alexandra Park/Grove Lodge Meadow Allotments	Chestnut Northside Residents Association	EMJCC Community Side	David Langan Architects
London Borough of Merton	Alexandra Residents Association	Chomley & Causton Residents Association	ENKI Architectural Design	Dental Health Centre
London Borough of Newham	Alexandra Residents Association	Church Crescent Residents Association	Eritrean Community in Haringey	Dental Practice
London Borough of Richmond Upon Thames Policy and Design	Alexandra Tenants Association Group	Clyde Area Residents Association	Ermine House Residents Association	Dental Surgery
London Borough of Tower Hamlets Strategic Planning	Archway Road Residents Association	Commerce Road Tenants Association	Ermine Road Residents Association	Department for Culture Media and Sport
London Borough of Waltham Forest	Campbell Court Residents Association	Coppetts Residents Association	Evering Pentecostal Church	Ecodomus
Westminster City Council Planning and City	Archway Road Tenants Association	CRH Tenants Association	FA Drawing Service	Devonshire Hill Primary School

Development				
London Borough of Havering	Arnold Road Residents Association	Cromwell Avenue Residents Association	Faith Baptist Church	Direct Planning Ltd
London Borough of Wandsworth	Ashdown Court Residents Association	Eastbourne Ward Residents Association	Faith Mosque	Discount Plans Ltd
London Borough of Ealing	Avenue Mews Tenants Association	Edgcott Grove Residents Association	Faith Restoration Ministry	Downhills Infant & Junior School
London Borough of Hackney	Bedford Road Tenants Association	Ermine House Residents Association	Family Health Service Authority	DPA (London) Ltd
City of London	Bell Residents Association	Ermine Road Residents Association	Family/Landmark Housing Association	DPDS Consulting Group
London Borough of Camden	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Ferry Lane Estate Residents Association	Federation of African Peoples Organisation	Duckett Dental Surgery
Department for Transport	Bowes Park Community Association	Fortismere Residents Association	Ferry Lane Estate Residents Association	Earlsmead Primary School
Garden Residents Association	Bowes Park Community Association	Garden Residents Association	Finsbury Park Track & Gym	Eastbourne Ward Residents Association
Grosvenor Road Residents Association	Bracknell Close/Winkfield Road Residents Association	Muswell Colney Residents Association	Friends of Ivatt Way	Ebenezer Foundation Advisory Association
Hale Estate Residents Association	Broadwater Farm Residents Association	Nelson Mandela Residents Association	Friends of Lordship Rec	South Hornsey Residents Association
Harmony Close Residents Association	Broadwater Residents Association	Noel Park North Area Residents Association	Friends of Markfield Recreation Ground	Southwood Lane Residents Association
Hillcrest Tenants & Residents Association	Bruce Castle Village Residents Association	North Grove Residents Association	Friends of Muswell Hill Playing Fields	Springfield Avenue Residents Association
Hillside Road Residents Group	Buckingham Lodge Residents Association	Northumberland Park Tenants & Community Association	Friends of Muswell Hill Playing Fields & Coldfall Wood	Stokley Court Residents Association
Hilltop House Residents Association	Flower Michelin Ltd	Oakdale Resident Association / South Tottenham RA	Friends of Noel Park	Stroud Green Residents Association
Hornsey Lane/Colwick	Forestry Commission	Palace Gates Residents	Friends of Paignton Road	Suffolk Road Residents'

Close Residents Association	England	Association		Association
HTBG Residents Association	Fortismere Residents Association	Palace View Residents Association	Friends of Queen's Wood	Summersby Road Residents Association
Jackson's Lane Residents Association	Fortismere School	Park Lane Close Residents Association	Friends of Railway Fields	The Chine & Cascade Residents Association
James Place/Church Road Residents Association	FOW	Partridge Way Residents Association	Friends of Railway Fields	The Weymarks Residents Association
Kingsley Place Residents Association	Frederick Knight Sports Ground	Plevna Crescent Residents Association	Friends of Stationer's Park	Tiverton Tewkesbury Residents Association
Lancaster Road Residents Association	Freight Transport Association	Remington Road Residents Association	Friends of the Earth (London Region)	Tower Gardens Residents Network
Lomond Close & Brunswick Road RA	Friends of Albert Road Recreation Ground	Resident Association	Friends of Tottenham Cemetery	Turner Avenue Residents Association
Lomond Close Residents Association	Friends of Bowes Park Garden	Resident Association	Friends of Wood Green Common	Veryan Court Residents Association
Love Lane Residents Association	Friends of Bruce Castle	Robert Burns Residents Association	G T Project Management	Wood Green Black Tenants Group
Millicent Fawcett Tenants Association	Friends of Hornsey Church Tower	Seymour Road Residents Association	Gage Limited	Wood Green Central Area Tenants & Community Assoc.
Moselle Close Residents Association	Friends of Brunswick Road Open Space	Sophia House Residents Association	Garden Drive Neighbourhood Watch	Woodridings Court Residents Association
Friends of Chestnut Park	Friends of Cherry Tree Wood	Friends of Crouch End Open Space	Friends of Downhills Park	Woodside Residents Association
Garden Residents Association	Guyana People's Congress	West Green Residents' Association	Haringey Irish Cultural & Community Centre	The Queens Mansions Residents Association
Gf Planning Limited	Habinteg Housing Association	Woodlands Park Residents Association	Haringey Leaseholders Association	Avenue Gardens Residents Association
Gladesmore Community School	Haines Philip Architects	Woodstock Road Residents Association	Haringey Mencap	Beresford Road Residents Association
Gladesmore Girl's & Young Women's Club	Hale Estate Residents Association	Cranley Gardens Residents' Association	Haringey Pakistan Cultural Society	Burghley Road Residents Association

Gladesmore Youth Club	Hamilton Bishop Ltd.	Wood Lane Residents Association	Haringey Phoenix Group	Chestnuts Northsid Residents Assn
Globe Projects Ltd	Hancock Architects	Gardens Residents Association (GRA)	Haringey Police	Chitts Hill Residents Association
Goan Community Centre	Haringey African Organisation	Grovelands, Lemsford & Leabank Residents Assoc.	Haringey Solidarity Group	Glasslyn, Montenotte Tivoli Road Residents Assoc.
Grace Baptist Chapel	Haringey Area Youth Project	Torrington Park Residents Association	Haringey Sports Council	HFRA (Haringey Federation of Residents Association)
Greek Community Care	Haringey Arts Council	Tynemouth Area Residents' Association	Haringey United Church	Morrish Residents Association
Greek Orthodox Church	Haringey Asian Women Aid	Friern Village Residents' Association	Haringey Women's Aid	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
Greek Parents Association	Haringey Autism	The Bounds Green and District Residents Association	Harmony Close Residents Association	Parkside & Malvern Residents Association
Green City Landscapes Ltd	Haringey Breastfeeding Centre	Dowset Road Residents Association.	HART Architecture	Parkside Malvern Residents Association
Greig City Academy	Haringey Community Volunteer	Haselmere Residents Association	Hartleys Projects Ltd	Rookfield Estate Residents Association
Gridline Architecture	Haringey Deaf Group	Haselmere Residents Association	Health and Safety Executive	Sandlings Residents Association
Grosvenor Road Residents Association	Haringey Faith Forum	Haringey Federation of Residents Associations	High Cross Church	The Alexandra Residents Association
Groundwork London	Haringey Ghanaian Community	Palace Gates Residents' Association	High Cross United Reformed Church	Warner Estate Residents Association
Gus Alexander Architects	Haringey Group London	Haringey Living Streets/	Highgate Group Practice	West Green Residents'

	Wildlife Trust	Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth		Association
Highgate Library Action Group	Crouch End Forum	Alexandra Palace Charitable Trust	Home Craft Consultant	HTBG Residents Association
Highgate Newton Community Centre	Fountayne Residents Association	Al-Hijra Somali Community Association	Homebase Ltd	IBI Design Associates
Highgate Primary School	Office of Government Commerce	Alliance Planning	Homebound Social & Luncheon Group	Industrial Dwellings Society
Highgate United Synagogue	Cornerstone Trading	Angolan Community Association	Homes & Community Agency	Innisfree Housing Association
Highgate Wood School	Barratt Development PLC	Arriva London	Hornsey Dental Practice	Irish Community Centre
Highpoint Dental Surgery	Inland Waterways Association	Asian Action Group	Hornsey Housing Trust	Irish in Britain Representation Group
Highway Youth Club	LB Greenwich	Asian Women's Association	Hornsey Housing Trust	Islamic Community Centre
Hill Homes	Metropolitan Development Service	Avenue Gardens Residents Association	Hornsey Lane & Colwick Close RA	Islamic Community Centre Women's Group
Hillcrest Tenants & Residents Association	London TravelWatch	Avenue Gardens Residents Association	Hornsey Lane Association	JA Architecture
Hillside Road Residents Group	St. Peter in Chains RC Infant School	Barnard Hill Association	Hornsey Lane/Colwick Close Residents Association	Jack Cruickshank Architects
Hilltop House Residents Association	Aarogya Medical Centre	Barton Willmore	Hornsey Moravian Church	Jacksons Lane Community Centre
Hollickwood Park Campaign	London Ambulance Service	Barton Willmore	Hornsey Mosque	Jackson's Lane Residents Association
Holly Park Clinic	3 Valleys	Bellway Homes	Hornsey Police Station	James Place/Church Road Residents Association
Holmes Design Ltd	African Caribbean Leadership Council	Beresford Road Residents Association	Hornsey School for Girls	Jason Read Pugh
Holmesdale Road &	Alexandra Palace & Park	Black & Ethnic Minority	Hornsey YMCA	Jesus for the Word

Orchard Road Neighbourhood Watch	CAAC	Carers Support Service		Community Project
Holy Innocents	Christian Action (Enfield) Housing Association	BME Community Services - Selby Centre	Housing 21	Jewish Orthodox Association
Holy Trinity Church	City Planning Group	BPTW	HPN Ltd	John Grooms Housing Association
British Waterways	Civil Engineers Ltd	John L Sims Surveyor	The Old Surgery	LB Harrow
Canal River Trust Head Office	Cluttons LLP	John Perrin & Co	Ethiopian Community Centre	LB Havering
Bruce Grove Primary School	College of Haringey, Enfield and North East London	JS Surveying And Design	Euroart Studios	LB Kensington & Chelsea
Burghley Road Residents Association	Colney Hatch Management Company Ltd.	Julian Cowie Architects	Family Mosaic	LB Lambeth
Buying Solutions	Connexions	Kings Avenue Dental Practice	Fields in Trust	LB Merton
CARA Irish Housing Association	Council of Asian People (Haringey)	Kingsley Place Residents Association	First Plus Planning	LB Newham
CB RE	Crossover Group	Kurdish Advice Centre	FirstPlan	LB Richmond Upon Thames
CGMS Consulting	Cypriot Elderly & Disabled Group	Kurdish Community Centre	Friends of Priory Park	LB Sutton
CGMS Consulting	Department for Business, Innovation and Skills	Kurdish Housing Association	Friends of Priory Park	LB Tower Hamlets
CGMS Consulting	Alexandra Park School	Kush Housing Association	Muswell Hill and Hornsey Friends of the Earth	LB Wandsworth
CgMS Ltd	Department of Environment Food and Rural Affairs	L & P Consultants	Friends of the Earth Tottenham & Wood Green	Lea Valley Primary School
CGMS Ltd	Derek Horne & Associates	Ladybur Housing Co-operativr	Friends, Families and Travellers and Traveller Law Reform Project	League of Jewish Women
Chestnuts Northsid	Dialogue Communicating	Lancaster Road Residents	Fusion Online Limited	LETEC

Residents Assn	Planning	Association		
Chettle Court Ranger Youth (FC)	DP9 Planning Consultants	LB Barking & Dagenham	Genesis Housing Group	Level Ltd
Cheverim Youth Organisation	Drivers Jonas Deloitte	LB Brent	Glasslyn, Montenotte Tivoli Road Residents Assoc.	Liberty Church
Chitts Hill Residents Association	LB Hammersmith & Fulham	LB Croydon	GLC-RAG	Lidl UK
Alderton Associates	Greek Cypriot Women's Organisation	LB Ealing	Grace Organisations - Elderly Care Centre	Lipton Plant Architects
GreenN8 Community Group	Livingstone Youth & Parent Support Centre	Hornsey Historical Society	Lord Morrison Community Centre	Living World Temple
Gt. Lakes Initiative & Support Project	Lomond Close & Brunswick Road RA	Hornsey Vale Community Association	Lordship Lane Infant School	Metropolitan Housing Trust
Haringey Chinese Centre	Lomond Close Residents Association	London First	Lordship Lane Junior School	Metropolitan Police
Haringey Cycling Campaign	London Ambulance Service	Jala - Johnathan A Law and Associates	Loren Design Ltd	Metropolitan Police
Haringey Fire Service	London Basement Company Ltd	Jamait-Al-Nissa	Love Lane Residents Association	Methodist Church
Haringey Peace Alliance	London Bat Group	Joint CAAC	M C Dentistry	Ministry of Justice
Haringey Play Association	London City Airport	Jones Lang LaSalle Planning	Manor House Dental Practice	Morrish Residents Association
Haringey Racial Equality Council	London Forum of Amenity & Civic Societies	King Sturge Llp	Marianne Davys Architects Ltd	Mount Anvil plc
Haringey Somali Community & Cultural Association	London Historic Parks & Gardens Trust	Knight Frank	Mario Pilla Architects	Mulalley and Company Ltd
Haringey Womens Forum	London Housing Federation	Ladder Community Safety Partnership	Markfield Project	Nathaniel Lichfields and Partners
HAVCO	London Islamic Cultural Society	Lambert Smith Hampton	MD Designs	National Federation of Gypsy Liaison Groups
Her Majesty's Court Service	London Islamic Cultural Society	LB Bexley	Metropolitan Development Consultancy	AMEC for National Grid

HFRA (Haringey Federation of Residents Association)	London Port Health Authority	LB Redbridge	Metropolitan Home Ownership	National Market Traders' Federation
Home Builders Federation - London	London Walking Forum	Lee Valley Estates	Metropolitan Police	New Testament Church of God
Home Office	London Waste Ltd	Lee valley Park Authority	Metropolitan Police Service	NHS London Healthy Urban Development Unit
Home-Start Haringey	London Wildlife Trust	London Continental Railway	Middle Lane Methodist Church	Noel Park CAAC
Hornsey CAAC	London Windows Direct Ltd	Dron & Wright	Middlesex Area Probation Service	Tottenham CAAC
Millicent Fawcett Tenants Association	North London Business	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park	Millennium Neighbourhood Watch & Residents Association	Rapleys
Millyard 7th day Baptist Church	North London Chamber of Commerce	Muswell Hill & Highgate Pensioners Action Group	New Stroud Green Health Centre	Redrow Homes (Eastern) Ltd
Ministry of Praise	North London Partnership Consortium	Muswell Hill Police Station	Newton Architecture	Restoration Community Project
Missionaries of Africa	North London Waste Authority	Muswell Hill Synagogue	NHS London	Rookfield Estate Residents Association
MJW	North London Waste Authority	Muswell Hill Youth Project	Nightingale Primary School	RPS Planning
Moravian Church	North Middlesex Hospital	N London Cultural Diversity Group	Noel Park Infant & Junior School	Sandlings Residents Association
More Space	Caldotec Ltd	N.A.G.	Noel Park North Area Residents Association	Savills
Morris House Dental Surgery	Campsbourne School	National Romany Rights Association	Noel Park Over 55's Club	Savills Planning
Morris House Surgery	Parkside & Malvern Residents Association	Neelkamal Asian Cultural Centre	North Grove Residents Association	St. James Church

Moselle Close Residents Association	Parkside Malvern Residents Association	Neil Wilson Architects	North Harringay Infant & Junior School	Selby Trust
Mountview Arts Centre	Peacock & Smith for WM Morrison Supermarkets plc	Nelson Mandela Residents Association	North London West Indian Association	Shian Housing Association Ltd
Mt. Olivet Baptist Church	Peacock and Smith	New Deal for Communities	Northumberland Park Community School	Haringey Trades Council
Murray Graham Architecture Ltd	PEEC Family Centre	New Image Design	Northumberland Park Tenants & Community Association	Woodstock Road Residents Association
Murray Mackeson Associates	Planning Perspectives	New River Action Group	Northumberland Park Women's & Childrens Centre	Workspace Group
Muswell Colney Residents Association	Pollard Thomas & Edwards Architects	New River Sports Centre	npower	YMCA
Muswell Hill & Fortis Green Association	PTEA	New Space	Oakdale Resident Association / South Tottenham RA	Cabinda Community Association
Muswell Hill & Highgate Handicapped Pensioners Club	Okpanam Women's Association	Patrick Hickey Design	Tottenham CAAC	Veolia Water Partnership
St. Mary's Church	Oromo Community in Haringey	Paul Archer Design	Tottenham Civic Society + Tottenham CAAC	London Parks and Gardens Trust
Stapleton Hall Ltd	Osel Architecture	Paul Buxton Associates	Transport For London	Pinkham Way Alliance
Stewart Ross Association/Dev Plan	Outline Building Limited	Peabody Design Group	Tree Trust for Haringey	Thames Water
Stock Woolstencroft	P R P Architects	Peabody Trust	Triangle Community Centre	Freehold Community Association
Stonewall	P. E. Ottery	Peabody Trust	Turley Associates	Natural England Consultation Service
Sustrans	P.D. Associates	People's Christian Fellowship	Campaign to Protect Rural England (CPRE)	Office of the Green MEPs,
Tan Dental Practice	Palace Gardens Association	Perfect Fit Kitchen & Interiors Ltd	Turnaround Publisher Services	Member of Parliament for Chipping Barnet

Tetlow King Planning	Palace Gates Residents Association	Peter Brades Architects	Pathmeads	One Housing Group
Thames Water Utilities Ltd	Palace View Residents Association	Phoenix Group	Unite Group PLC	Hyde Housing
Thames Water Wastewater Services	Park Lane Close Residents Association	Plevna Crescent Residents Association	Veolia Environmental Services (UK) Plc	Protect Bruce Castle Area (PBCA)
The Alexandra Residents Association	Park Road Dental Practice	Police & Community Working Group	Wards Corner Community Coalition	Pyramid Counselling Services
Haringey Council	Park Road Pool	Port of London Authority	Wards Corner Community Development Group	Quorum Associates
The Mulberry Primary School	Park View Academy	Post Office	Warner Estate Residents Association	Randall Shaw Billingham
The Planning Inspectorate	My Dental Care	Post Office Counters Ltd	Haringey Citizen's Advice Bureau	Redemption Church of God
The Ramblers	Park Vue Dental Practice	Powergen plc	West Green Residents' Association	Remington Road Residents Association
The Theatres Trust	Parsons Brinckerhoff Ltd	Pride of Ferry Lane	Woodlands Park Residents Association	Rennie & Partners
<u>Sustrans</u>	Partridge Way Residents Association	Propel Projects	Sierra Leone Family Welfare Association	Rhodes Avenue Primary School
Tiverton Primary School	Mobile Operators Association	Planning Potential	Sigma Design Build UK	Richard S McCarthy Architect
Viridian Housing	Milmead Industrial Management Ltd.	Shire Consulting	Simon Bocking Building Services	Rie Nijo Architecture
Tamil Community Housing Association Ltd	Martineau	Sunlight Lofts Ltd	Simon Levy Associates	Risley Avenue Infant & Junior School
London & Quadrant	Royal Society for the Protection of Birds	Haringey Allotments Forum	Society for the Protection of Ancient Buildings (SPAB)	Robert Burns Residents Association
Muswell Hill CAAC	Rutland House Surgery	Montagu Evans	Solon Housing Co-operative Housing Services	Robert Harrison Property
Lee Valley Regional Park Authority	Saheli Asian Girls & Young Womens Group	Newlon Housing Trust	Somali Community Group	Rolfe Judd Planning Ltd

LB Southwark	Sakumoh Dance Group	Karin Housing Association	Somali Welfare Association	Royal Mail Property Holdings
British Waterways Board (London Office)	Sanctuary Housing Association	CG Architects	Somerset Gardens Family Health Care	Springfield Avenue Residents Association
Friends of Parkland Walk	Sanctuary Youth Club	Tottenham Police Station	Sophia House Residents Association	St, Paul's and All Hallows CE Junior School
Friends of Woodside Park	Save Britain's Heritage	Methodist Homes	South Harringay Infant School	St. Andrews Vicarage
The Highgate Society	Save the Environment of Park & Palace (STEPP)	Network Housing	South Harringay Junior School	St. Ann's Primary School
Circle Houing Group	Savills Plc	Innisfree HA	South Hornsey Residents Association	St. Anns Church
Highgate CAAC	Scenario Architecture	Arhag HA	Southwood Lane Residents Association	St. Benet Fink
Lien Viet Housing Association	Schamroth + Harriss Architects	Lee Valley Estates	Spenser Associates	St. Cuthbert's Church
Islington and Shoreditch HA	Servite Houses	Logic Homes Ltd	Sport England London Region	St. Francis de Sales RC Infant & Junior School
Apna Ghar Housing Association	Seven Sisters Infant & Junior School	North London Business	Sporting & Education Solution	St. Gildas' RC Junior School
Carr-Gomm	Seventh Day Adventist Church	North London Sub-Region	St. Paul's Church	St. Ignatuis RC Primary School
Circle 33 Housing Trust	Seymour Road Residents Association	Notting Hill Housing Association	St. Peter Le Poer	St. James CE Primary School
Community HT (One HG)	SGI Sokagakkia	Nottinghill Housing Group	St. Thomas More School	St. James Dental Surgery
Grainger PLC	Sierra Leone Community Empowerment Project	Origin Housing	St. Vincent Social & Economic Association	St. John the Baptist Greek Church
Guinness Trust	Space Design Consultants Ltd	Origin Housing	Stagecoach - SELKENT	St. John Vianney Church
Habinteg Housing Association Ltd	Stokley Court Residents Association	Origin Housing Group	Stamford Hill Primary School	St. John's
Hornsey Housing Trust	Stroud Green Baptist Church	Pocket	Stationers Community Centre	St. Marks Methodist Church
Housing 21	Stroud Green Housing	Pocket	Staunton Group Practice	St. Mary Community

	Co-operative			Centre
Teachers Housing Association	Stroud Green Residents Association	Pocket Living	Stephen Donald Architects	St. Mary's CE Infant School
The Abbeyfield Society	STS Structural Engineering	Sahil HA	LB Bromley	St. Mary's CE Junior School
Pinkham Way Alliance	Stuart Crescent Health Centre	Sahil Housing	St. Martin of Porres RC Primary School	St. Mary's Greek Orthodox Cathedral
Muswell Hill Sustainability Group	Stuart Henley & Partners	Sanctuary Group	Turkish Cypriot Community Association	St. Mary's RC Infant & Junior School
S. Mary's Vicarage	Studio 11 Design Ltd	Sanctuary Housing	Iceni Projects Limited	St. Michael's CE Primary School
Networked Neighbourhoods	Studio 136 Architects	Shian Housing Association	Mind In Haringey	St. Paul the Apostle
Cranley Gardens Residents' Association	Suffolk Road Residents' Association	Southgate Churches & Wood Green	Pellings Llp	St. Paul's
The Hawthorns RA and Neighbourhood Watch	Summersby Road Residents Association	St Mungo	Oliver Burston Architects	St. Paul's and All Hallows CE Infant School
Haringey Forum for Older People	Sunshine Garden Centre	Tetherdown Primary School	Highgate URC Church	The Clock Tower Practice
Woodside High School	Sure Youth Foundation Project	Thames Gateway London Partnership	Earlham Primary School	The Gainsborough Clinic
LB Lewisham	Symon Smith & Partners	The Alexandra Surgery	John Rowe-Parr Architects	The Georgian Group
Barker Parry Town Planning Ltd	T.B.F.H.A	The Bowes Road Dental Practice	The Garden History Society	The Green CE Primary School
Lancasterian Primary School	Tasou Associates	The Chine & Cascade Residents Association	Westminster City Council	The Gypsy Council
Exposure Organisation	Temple of Refuge	The Christchurch Hall Surgery	Wood Lane Residents Association	8 Stuart Crescent Health Centre,
Open Door	Templeton Associates	Spur Road Surgery	Gardens Residents Association (GRA)	The John Loughborough School
Muswell Hill Primary School	The Willow Primary School	The Tree Council	Royal Borough of Kingston upon Thames	The North London Gay & Lesbian Association
Family Mediation Service	Millennium Dental	The Tree Trust for	St. John the Baptist Greek	The Surgery

	Practice	Haringey	Church	
Sovereign Group Ltd	St. Paul's Catholic Primary School	The United Reformed Church	Grovelands, Lemsford & Leabank Residents Assoc.	Myddleton Road Surgery
St. Francis de Sales	Rokesly Junior School	The Victorian Society	Tottenham Traders Association	St John's Road Surgery
Leads Design Partnership	Tynemouth Area Residents' Association	The Weymarks Residents Association	Tottenham Trust	Dowset Road Residents Association.
St. Aidan's VC Primary School	Papa Architects Ltd	Affinity Water Limited	Tottenham Women's Aid	Bridge Renewal Trust
Keeping it Simple Training (KIS) Ltd	Friern Village Residents' Association	Tibbalds TM2	Tower Gardens CAAC	Winbourne Martin French (chartered surveyors).
Home Group	Enfield, Haringey and Barnet Samaritans	Tiverton Tewkesbury Residents Association	Tower Gardens Residents Network	Muswell Hill & Fortis Green CAAC
The Parish of Wood Green	Dixon Searle LLP	Tomlinson Tree Surgeons	Town & Country Planning Limited	Transition Crouch End
Ferry Lane Primary School	Mario Pilla Architects Ltd	Tottenham & Wood Green Pensioners Group	Trafalgar Christian Centre	Hornsey Historical Society member.
St. John Vianney School	LB Merton	Tottenham Baptist Church	Transco	MHFGA
Action for Kids Charitable Trust	LB Merton	Tottenham Community Sports Centre	Trinity at Bowes Methodist Church	CgMs Consulting
Muswell Hill Centre	The Bounds Green and District Residents Association	Tottenham Green Sports Centre	Turkish Cypriot Counselling Group	London borough of Enfield
Coleridge Primary School	Rapleys LLP	Tottenham Green Taskforce	Turkish Cypriot Elderly Group	London Borough of Enfield
Stroud Green Primary School	Savills,	Tottenham Irish Women's Group	Turkish Cypriot Forum	Collins & Coward
Barnet, Enfield and Haringey Mental Health Trust	Mario Pilla Architects Ltd	Tottenham Peoples Initiative	Turkish Cypriot Peace Movement in Britain	Hornsey Historical Society member
Our Lady of Muswell Hill Primary School	Planning Bureau - McCarthy and Stone	Tottenham Police Station	Turkish Cypriot Women's Project	A2 Dominion Group
Torrington Park Residents	Turnpike Lane Citizens	Warham Road	Turkish Parents	The Highgate Society

Association	Advice Bureau	Neighbourhood Watch	Association	
Mayor's Office for Policing and Crime	Twentieth Century Society	Charalambous Architectural Consultant	Turkish Youth Association	Urban Vision Partnership Limited Regulatory Services
Haringey Young Carers Project	TWG FoE/FoE London	Welbourne Primary School	Turner Avenue Residents Association	Planware Ltd
We Love Myddleton Road	Tynemouth Medical Practice	West Green Neighbourhood Watch	TfL London Rail	Wood Green Central Area Tenants & Community Assoc.
Architectural Heritage Fund	Uganda Welfare Association	West Green Primary School	LOROL	Wood Green Community Link
Smith Jenkins Town Planning Consultants	Umfreville Road Neighbourhood Watch	West Green Regeneration Group	Metroline	Wood Green Dental Practice
Level Ltd	Unit One Architects	Westbury Dental Practice	Abellio	Wood Green Police Station
SSA Planning Ltd	United Apostolic Faith Church	Westbury Medical Centre	Go Ahead	Wood Green Regeneration
London Gypsy and Traveller Unit	Universal Church of the Kingdom of God	Weston Park Primary School	Greater Anglia	The Archdeacon of Hampstead
Met Police – Safer Transport Team - Haringey	Urban Futures London Ltd	White Young Green Planning	Haselmere Residents Association	Wood Green Youth Club
First Capital Connect	Urban Homes Ltd	Whitehall Community Centre	Haringey Disability First Consortium	Woodberry Down Baptist Church
DSO Edmonton London Ambulance Service	Van Rooyen Design	Willoughby Road Methodist Church	London Travel Watch - Chair of Consumer Affairs	Woodlands Park Infant & Junior School
London Ambulance Service	Veryan Court Residents Association	Wilson & Bell	London Travel Watch	Woodridings Court Residents Association
Arriva	Victim Support Haringey	Winkfield Road Community Centre	Haringey Cycling Campaign	Woodside Residents Association
Metroline	Visit London	Wise thoughts - gaywise	Age UK	Xeva Design Concepts
Transport for London	Vivendi Architects LLP	Women & Medical Practice	Mobility Forum/ Age Concern Haringey	Yabsley Stevens Architects
W. A. Shersby	Voluntary Action Haringey	Wood Green Area Youth	Haringey Disability First	Young Lesbian Group

		Project	Consortium (Access & Transport sub-group)	
Haringey Federation of Residents Associations	Amec Foster Wheeler on behalf of National Grid	Wood Green Black Tenants Group	Fairview	Youth One Stop Shop
Palace Gates Residents' Association	Berkeley Homes (North East London) Ltd	The Queens Mansions Residents Association	Fountayne Residents Association	Youth Theatre Project
Highgate Neighbourhood Forum	Boyer Planning London	Ladder Community Safety Partnership	DP9 Planning Consultants	Zatkhon Construction Co. Ltd.
Sustainable Haringey/ Muswell Hill and Fortis Green Association	Living Under One Sun	Department for Education	Chartered Landscape Architect	NHS Property Services Ltd
Sustainable Haringey Transport Group	Hackney Community Transport Group	Chris Thomas Ltd	Fairview New Homes	HAVCO
Barking-Gospel Oak line users group	London at BT Group and Chair, Haringey Business Board	Haringey NHS	Crouch End Forum	Whittington Hospital Trust
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	Haringey Teaching Primary Care Trust			

Appendix D – Statement of Representation Procedure

Statement of Representations Procedure for the Haringey Local Plan:
Alterations to the Local Plan Strategic Policies Proposed Submission (Regulation 19)
Development Management DPD Proposed Submission (Regulation 19)
Site Allocations DPD Proposed Submission (Regulation 19)
Tottenham AAP Proposed Submission (Regulation 19)

As part of the local Plan, Haringey Council plans to submit four Local Development Documents (Alterations to the Local Plan: Strategic Policies DPD, the Development Management DPD, the Site Allocations DPD, and the Tottenham Area Action Plan) to the Secretary of State for Communities and Local Government. The submission documents are being published for representations.

Title of Documents

Alterations to the Local Plan Strategic Policies: Pre-Submission Consultation

Development Management DPD: Pre-Submission Consultation

Site Allocations DPD: Pre-Submission Consultation

Tottenham AAP: Pre-Submission Consultation

Subject Matter

The Strategic Policies were adopted in 2013 and **sets out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026**. A partial review is proposed to take account of new growth requirements for the Borough as set out in the London Plan (2015) as well as the findings of updated evidence base studies. A schedule of proposed changes is subject to public consultation and comment. The Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development across the borough. Once adopted, the policies will supersede those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations DPD **allocates 'proposal sites' for development where opportunities have been identified, and identifies new or revised designations to which planning policies will apply** (including shopping frontages and reclassification of industrial designated land), outside of the Tottenham AAP area. Once adopted, the proposal sites and designations will appear on the Haringey policies map, replacing that which accompanies the Haringey Unitary Development Plan (2006).

The Tottenham Area Action Plan proposes a comprehensive set of policies, proposals and site allocations for future development within the Tottenham area based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

Area Covered

The draft Tottenham Area Action Plan area comprises the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of the Bruce Grove, St. Ann's and Seven Sisters.

The Strategic Policies (Partial Review) and Development Management Policies apply to the entire Borough, while the draft Site Allocations DPD applies to that part of the Borough outside of the draft Tottenham AAP boundary.

Period within which representations must be made

Representations must be made between **8th January and received no later than 5pm Friday 4th March 2016.**

Where have the documents been made available, and the places and times at which they can be inspected:

The four DPDs and supporting documentation are available for inspection at the following locations:

- Council's website www.haringey.gov.uk/localplan
- Haringey Civic Centre, Wood Green High Rd, N22 8LE
- Level 6 River Park House, Wood Green, N22 8HQ
- At all of Haringey's libraries (see details below)

Address	Opening Times	Address	Opening Times
Alexandra Park Library Alexandra Park Road, N22 7UJ	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	Coombes Croft Library Tottenham High Road, N17 8AG	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
Highgate Library Shepherds Hill, Highgate, N6 5QT	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	Hornsey Library Haringey Park, Hornsey N8 9JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm
Marcus Garvey Library 1 Philip Lane, Tottenham Green N15 4JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	Muswell Hill Library Queens Avenue, Muswell Hill N10 3PE	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
St Ann's Library Cissbury Road, Tottenham N15 5PU	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	Stroud Green and Harringay Library Quernmore Road N4 4QR	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
Wood Green Library High Road, Wood Green N22 6XD	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm		

Making a representation

The Council welcomes comments on the four DPDs. At this stage of the plan-making process, it is important that representations are made in the format included on the representations response form. These are available alongside consultation documents both online and in hard copy form.

Representations can be made via:

- the online response form at <http://haringey.gov.uk/localplan>
- by email at ldf@haringey.gov.uk
- by post to Local Plan Consultation, Level 6, River Park house, Wood Green, N22 8HQ

Please note that all responses received will be made publically available.

Comments must be received by 5pm on Friday 4th March.

For any further enquiries, please email ldf@haringey.gov.uk or contact the Local Plan Team on 020 8489 1479

Appendix E – List of Specific Consultation Bodies

Greater London Authority
English Heritage
The Coal Authority
Environment Agency
The Historic Buildings & Monuments Commission for England
Natural England
London Midland
Harrow Primary Care Trust
Defence Infrastructure Organisation
British Gas PLC Group
EDF Energy
Thames Water Utilities Ltd
Thames Water Property
Veolia Water Central
Homes and Communities Agency - London
Planning Inspectorate
Communities and Local Government
Entec on behalf of National Grid

Appendix F – Letter to the Mayor of London

Mayor of London

City Hall

The Queen's Walk

London

SE1 2AA

Date: **11th January 2016**

Contact : Planning Policy Team

Direct dial: 020 8489 1479

Email: ldf@haringey.gov.uk

Dear Mayor,

Haringey Local Plan Regulation 19 Pre-Submission Public Consultation 8th January 2016 - 4th March 2016

As you are aware, Haringey Council has recently published four Local Plan documents for pre-submission consultation in accordance with Regulation 19(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The four Development Plan Documents are the:

- Alterations to the Strategic Policies 2011 - 2026;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

Copies of these are enclosed.

Pre-submission consultation on the DPDs will run for eight weeks from **Friday, 8th January** to **Friday, 4th March 2016**.

I write to you pursuant to section 24(4)(a) of the Planning and Compulsory Purchase Act (2004) and Regulation 21(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 to seek your opinion as to the conformity of the pre-submission Development Plan Documents with the London Plan.

In accordance with the statutory requirements, I would be grateful to receive your opinion no later than Friday 4th March 2016.

Yours sincerely,

Matthew Patterson

Matthew Patterson, Head of Strategic Planning

cc. Graham Clements, Greater London Authority

Appendix G – Response Form

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation

The council is publishing four Development Plan Documents for consultation. These are the:

- Alterations to the Strategic Policies (DPD) (adopted 2013)
- Draft Tottenham Area Action Plan: Preferred Option
- Draft Development Management Policies (DPD): Preferred Option
- Draft Site Allocations (DPD): Preferred Option

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the word compatible version of this form which is available for downloading from the Council's website www.haringey.gov.uk/localplan.

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they **should only relate to the "tests of soundness"** (see DPDs appendices and the guidance note on our website for more information on the "tests of soundness").

Complete the form overleaf and return to:

Local Plan team
Level 6, River Park
House,
Wood Green
London
N22 8HQ

Or by email to:

ldf@haringey.gov.uk

Or on-line:

www.haringey.gov.uk/localplan

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4th March 2016**.

Next Steps

In the summer of 2016 the Planning Inspector will hold an “Examination in Public” to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

For further information please visit www.haringey.gov.uk/localplan or email ldf@haringey.gov.uk

Ref: (for official use only)	Local Plan Publication Stage Response Form	
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Name of the DPD to which this representation relates:

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:

Part A – Personal Details

Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

1. Personal Details ¹	2. Agent's Details
Title	
First Name	
Last Name	
Job Title (where relevant)	
Organisation (where relevant)	
Address Line 1	
Address Line 2	
Address Line 3	
Post Code	
Telephone Number	
Email address	

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
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4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
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4.(3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>
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Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.
If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and

*supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.
After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.*

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature Date:

Appendix H – Respondents to the Pre-Submission Schedule of Alterations to the Strategic Policies DPD Consultation

ID	Respondent	Wishes to Attend Hearings	ID	Respondent	Wishes to Attend Hearings
1	Quod obo Muse Developments and the Canal and River Trust	Yes	15	GL Hearn Limited obo Capital and Regional Plc	Yes
2	Quod on behalf of St William	Yes	16	Colliers on behalf of Diamond Build	Not stated
3	Iceni Projects on behalf of Berkeley Homes (North East London Limited)	Yes	17	North London Waste Authority	No
4	Quod on behalf of THFC	Yes	18	Janet Shapiro	Not stated
5	Fairview New Homes Ltd	No	19	Canal and River Trust	Not stated
6	Highgate Neighbourhood Forum	Yes	20	Our Tottenham	Yes
7	Zena Brabazon	Yes	21	Magnus Dahlstrand	Yes
8	Maria Jennings	Yes	22	Environment Agency	No
9	Anne Gray	Yes	23	CPRE London	Not stated
10	Lynne Zilkha	Not stated	24	London Borough of Hackney	Not stated
11	Home Builders Federation	Yes	25	Greater London Authority	Not Stated
12	Rapleys on behalf of LaSalle Investment Management	Yes	26	Transport for London	Not Stated
13	DP9 on behalf of KA Investments	Not stated	27	Historic England	Not Stated
14	Marco Consolaro	No			

Appendix I – Individual Comments received to the Pre-Submission Schedule of Alterations to the Strategic Policies DPD Consultation – Respondent Order

Respondent 1: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RSP1	Alt6 1.2.16	No response given	No response given	Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing need for more homes in London. This will ensure the effectiveness of the plan meaning that it can be properly monitored against strategic targets. Please refer to the accompanying cover letter (part (c) bullet 1).	Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing need for more homes in London. This will ensure the effectiveness of the plan meaning that it can be properly monitored against strategic targets. Please refer to the accompanying cover letter (part (c)).	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802 homes. The Council does not consider that the suggested change to the introductory text adds any clarity to the Plan. No change
1	RSP2	Alt9 1.3.11	No response given	No response given	Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete "to be") . Please refer to the accompanying cover letter (part (c) bullet 2).	Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete "to be") .	It is agreed that "to be" as well as "proposed" should be deleted from this sentence.
1	RSP3	Alt35 3.1.16	No	No response given	Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing employment sites to provide more	Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing	It is considered that adding the text requested weakens the policy, rather than adding flexibility. The

				<p>intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability:</p> <p>“...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth in the retail and leisure provision, and through increased community facilities...”</p> <p>Proposed Quod Alteration</p> <p>This is particularly the case because Chapter 5 confirms the site as being located within the Regeneration Area being the most flexible of employment categories that can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses. We also note that Policy SP8 is proposed to be amended to specifically include the Hale Wharf site in the Regeneration Area category, which is welcomed.</p> <p>Without those proposed changes,</p>	<p>employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability:</p> <p>“...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth in the retail and leisure provision, and through increased community facilities...”</p> <p>Proposed Quod Alteration</p> <p>Without those proposed changes, the plan is not sufficiently flexible as it not always appropriate for mixed use schemes to provide more intensive employment/business uses.</p>	<p>presumption is, that as Haringey is an inner London borough with generally good PTAL levels, that more, not less, intensive employment outcomes will be expected on existing employment sites, especially Regeneration Area sites. This approach is consistent with evidence and the need to meet the Council’s employment target.</p> <p>No change</p>
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					<p>the plan is not sufficiently flexible as it not always appropriate for mixed use schemes to provide more intensive employment/business uses</p> <p>Please refer to the accompanying cover letter (part (c) bullet 3).</p>		
1	RSP4	Para 3.1.18	No	No response given	<p>This paragraph seeks the requirement of a pedestrian green link at the Hale Wharf Site. However, the Planning Obligations SPD confirms that open space and public realm infrastructure will be funded through CIL. It is therefore inappropriate for this supporting paragraph to continue to require that such connections be included as part of detailed scheme proposals for Hale Wharf.</p> <p>This paragraph therefore is not the most appropriate strategy when considered against reasonable alternatives, failing this soundness test.</p> <p>Please refer to the accompanying cover letter (part (c) bullet 4).</p>	The paragraph should be amended and the requirement to incorporate one element of the east-west pedestrian green link removed.	<p>The paragraph questioned doesn't mention funding for the east-west pedestrian link. In any regard, it is considered to be a key piece of place-making infrastructure in the Tottenham Hale Area and a site specific requirement for Hale Wharf to make redevelopment of the site appropriate in planning terms.</p> <p>No change</p>
1	RSP5	Alt54 3.2.4	No response given	No response given	<p>Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target. Please refer to the accompanying cover letter (part (c) bullet 5).</p>	Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target.	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing

						This will ensure the effectiveness of the plan meaning that it can be properly monitored against strategic targets.	requirement of 19,802 homes. The Council does not consider that the suggested change within text adds any clarity to the Plan. No change
1	RSP6	Alt61 3.2.22	No response given	No response given	Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “subject to viability” inserted at the start of the paragraph. Please refer to the accompanying cover letter (part (c) bullet 6).	Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “subject to viability” inserted at the start of the paragraph.	The suggested addition adds nothing to the Plan. Policy DM13 of the Development Management Policies DPD sets out the more detailed considerations for affordable housing provision, including development viability. No change
1	RSP7	Whole plan	No response given	No response given	Muse Developments and CRT generally support the alterations being proposed to Strategic Policies and make the following comments:		Noted.
1	RSP8	Alt6	No response given	No response given	Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing need for more homes in London	As per response form	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802

							homes. The Council does not consider that the suggested change to the introductory text adds any clarity to the Plan. No change
1	RSP9	Alt9	No response given	No response given	Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete “to be”);	As per response form	It is agreed that “to be” as well as “proposed” should be deleted from this sentence.
1	RSP10	Alt35	No	No response given	Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability: “...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth in the retail and leisure provision, and through increased community facilities...”	As per response form	It is considered that adding the text requested weakens the policy, rather than adding flexibility. The presumption is, that as Haringey is an inner London borough with generally good PTAL levels, that more, not less, intensive employment outcomes will be expected on existing employment sites, especially Regeneration Area sites. This approach is consistent with evidence and the need to meet the Council’s employment target.

					<p>Proposed Quod alteration</p> <p>This is particularly the case because Chapter 5 confirms the site as being located within the Regeneration Area being the most flexible of employment categories that can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses. We also note that Policy SP8 is proposed to be amended to specifically include the Hale Wharf site in the Regeneration Area category, which is welcomed.</p>		No change
1	RSP11	Para 3.1.18	No	No response given	<p>Paragraph 3.1.18 of the adopted Strategic Policies (March 2013) identifies the Hale Wharf site within the Tottenham Hale Growth Area and states:</p> <p>“A mini-masterplan is being devised to underpin a comprehensive, residential-led development for the entire Hale Waterside site, which could provide a significant number of new homes as well as commercial uses. This plan will take account of the Regional Park Authority’s objectives, as Hale Wharf is within the Lee Valley Regional Park. A proposed pedestrian footbridge across the River Lee will form an integral part</p>	As per response form.	<p>The paragraph questioned doesn’t mention funding for the east-west pedestrian link. In any regard, it is considered to be a key piece of place-making infrastructure in the Tottenham Hale Area and a site specific requirement for Hale Wharf to make redevelopment of the site appropriate in planning terms.</p> <p>No change</p>

				<p>of the scheme, and one element of the east-west pedestrian ‘green link’”.</p> <p>Whilst Muse and CRT are supportive of the general approach to improving pedestrian links within the ‘green link’, the inclusion of a number of bridges as part of a scheme should be informed by detailed development proposals and scheme viability.</p> <p>Since the adoption of the Strategic Policies in March 2013, LB Haringey published the Planning Obligations Supplementary Planning Document (SPD) (October 2014) that set out the relationship between planning obligations and the Community Infrastructure Levy (CIL) (LB Haringey adopted its CIL Charging Schedule in July 2014). This confirms that Open Space and Public Realm Infrastructure requirements, such as public open space/public parks, including improvements to existing facilities will be funded through CIL.</p> <p>Any development proposals for the site are likely to improve east/west connections in any event. It is inappropriate therefore for the supporting text to continue to</p>		
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					<p>require that such connections be included as part of detailed scheme proposals for Hale Wharf.</p> <p>The paragraph should therefore be amended and the requirement to incorporate one element of the east-west pedestrian green link be removed. It is more appropriate that such proposals form part of detailed application proposals, the consideration of which can take into account site constraints, other development plan policies and scheme viability at the appropriate time.</p>		
1	RSP12	Alt54	No response given	No response given	Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target.	As per response form	<p>Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802 homes. The Council does not consider that the suggested change within text adds any clarity to the Plan.</p> <p>No change</p>
1	RSP13	Alt61	No response given	No response given	Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “subject to viability” inserted at the start of the	As per response form	The suggested addition adds nothing to the Plan. Policy DM13 of the Development

					paragraph.		Management Policies DPD sets out the more detailed considerations for affordable housing provision, including development viability. No change
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Respondent 2: Quod on behalf of St William

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RSP14	Alt6 Chapter 1 Introduction	Yes	Yes	<p>We recognise that the release of 2011 Census data, which set out higher than previously projected population growth figures for London, has resulted in the Mayor of London adopting Further Alterations to the London Plan (FALP).</p> <p>This has significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. This increase requires a review of housing delivery in the borough, and a clear need to maximise development opportunities in appropriate locations.</p>	None stated	Noted.
2	RSP15	Alt30 SP1	Not stated	Not stated	We welcome the continued role of Haringey Heartlands and Wood Green as a Growth Area and the requirement to maximise site opportunities in these locations. We support the inclusion of Clarendon Gas Works within this Growth Area.	None stated	Noted.

2	RSP16	Alt32 SP1 Table 2	Not stated	Not stated	We note that Haringey Heartlands and Wood Green Metropolitan Centre are identified for housing delivery of 4,595 homes up to 2025 (previously the target was 1,720). The Wood Green AAP Issues and Options Document (2016) Option Four (The favoured option of the Council) promotes a minimum of 6,000 new homes for a comparatively similar area (albeit the boundary areas are different). We consider that it would be prudent for the strategic housing targets to correlate to the Wood Green favoured option.	As per response form	The 6,000 home target relates to the Wood Green AAP, which is still at its earliest stage of preparation, and is still subject to more testing, including provision for a CR2 station serving the area, and will be subsequent to the Local Plan, replacing the current site allocations once adopted. It is therefore not appropriate to amend the figure in the Strategic Plan, at this stage to reflect an option in the draft Wood Green AAP. No change.
2	RSP17	Alt49 & Alt50 SP2	Not stated	Not stated	We note that the policy reduces a borough wide affordable housing requirement from 50% to 40% due to the Haringey Development Appraisals & Viability Testing January 2015, and would maintain that this borough wide target is tested through viability modelling for each application site. We note that the affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing is now proposed in line with the London Plan.	Not stated	Noted. Policy DM13 of the Development Management Policies DPD sets out the more detailed considerations for affordable housing provision on individual development sites, including development viability. No change
2	RSP18	Alt56 SP2 Para 3.2.7	Not stated	Not stated	Now includes reference to the Haringey Urban Characterisation Study (2014). The evidence base for the Local Plan refers to a	As per response form	The UCS is an evidence document which supports Local Plan preparation. A

					2015 document. The Study provides useful urban design analysis, but will ultimately be superseded, in part, by the Wood Green AAP, and therefore we question the appropriateness of the reference. The 2015 document is also out of date in terms of its reference to Clarendon Gas Works.		correction is required to the Alt56 to change the date of the Haringey Urban Characterisation Study to read 2015.
2	RSP19	Alt73 SP8	Not stated	Not stated	We note that Wood Green Local Employment Area is a Regeneration Area which is the most flexible of the categories as it can include mixed use development such as small scale “walk to” retail, community and residential uses. This is supported.	Not stated	Noted.
2	RSP20	SP8 Para 5.1.18 Alt77	Not stated	Not stated	We note that the London Plan (2015) sets out revised employment projections for Haringey. The London Plan forecasts 12,000 additional jobs in the Borough over the period 2011 – 2026. Over the period 2011 – 2036, it forecasts an additional 22,000 jobs in Haringey. This represents a 29.5% increase in jobs. St William aims to meet sustainable economic needs where it develops and considers Clarendon Gas Works a site where it can assist Haringey Council in contributing to its London Plan objectives.	Not stated	Noted.

Respondent 3: Icen Projects Ltd on behalf of Berkeley Homes (North East London Limited)

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RSP21	Alt30 - Policy SP1	Not stated	Not stated	Berkeley Homes welcomes the amendments to Policy SP1 which seek to ensure the Council meet and exceed its strategic housing requirement of 19,802 homes over the	Not stated	Noted.

					plan period, achieved in part through the promotion of Tottenham as a key growth area but with recognition that development may also occur in other areas of the Borough.		
3	RSP22	Alt 47-50 and 52 - Policy SP2	Not stated	Not stated	<p>Berkeley Homes supports the reduction in the affordable housing target to 40% based on habitable rooms in accordance with the evidence of the Borough's latest viability assessment (Haringey Development Appraisals & Viability Testing, January 2015). It is critical to ensure that the provision of affordable housing does not harm the continual delivery of needed homes.</p> <p>Berkeley Homes also support the proposed housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing in line with the London Plan and consistent with the Strategic Housing Market Assessment (SHMA) findings to deliver more balanced communities and to ensure scheme viability.</p> <p>The proposed amendments to Policy SP2 (8) which states the preferred affordable housing mix, in terms of unit size and types of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing needs at the time of any application is also supported.</p>	Not stated	Noted.

3	RSP23	Alt 56 - paragraph 3.27	No	Not stated	It is considered that this policy is not consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density, (which is simply a mathematical calculation) but of the quality of the proposed development overall and the place it will create in its context.	An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space. Policy SP2 should be amended to reflect this.	The policy is in line with London Plan policy. Policy DM11 in the Development Management Policies provides further amplification, including that alongside SP2 the optimum housing potential of a site is to be determined through a rigorous design-led approach. No change
3	RSP24	Alt 70, 71 and 73 – Policy SP8	Not stated	Not stated	This policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites. Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with our emphasis added) “Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest further decline in industrial and warehousing employment which is expected to result in some surplus employment	As per response form	The quantum of space available in the borough has fed into the Employment Land Study, which has in turn informed the policy position in the Plan. It is considered that this is appropriate in delivering an evidenced Local Plan. The policies included in this plan enable an appropriate approach to managing urban renewal on industrial sites in appropriate locations. No change

					<p>land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to contribute to Haringey’s housing and regeneration objectives. At the same time, it will be important that fit-for-purpose, well occupied B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities.”</p> <p>“The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community. At the same time, there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough’s housing and regeneration pressures.”</p> <p>The release of an employment site for an alternative use can lead to the regeneration of an area through the introduction of new investment. The potential for a site to be released from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.</p>		
3	RSP25	Alt 76 -	Not	Not stated	The proposed Alterations 70, 71 and	Draft paragraph 5.1.14	Local Employment

		paragraph 5.1.14	stated		73 discussed above would seem to be in conflict with the Councils proposed amendment to paragraph 5.1.14 which seeks a more proactive and positive approach to planning for economic development.	says that ‘it will be important for a flexible approach to economic development to be taken on Local Employment Areas by not placing significant restrictions on carefully managing the type of employment use that is permitted on allocated sites’. This would imply some flexibility for none employment uses to be accommodated in defined employment areas and it is suggested that the same flexibility be applied to other non-designated employment sites as a minimum.	Area: Regeneration Area designations are the sites suitable for a mix of employment and non-employment uses. The employment offers/use of these sites is still a principle consideration. No change
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Respondent 4: Quod on behalf of THFC

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
4	RSP26	Para 3.1.35	Yes	Yes	THFC continue to support the promotion of development in the North Tottenham Growth Area (which includes Northumberland Park, the redevelopment of THFC Stadium and High Road West). THFC also support the identification in supporting paragraph 3.1.8	“ Provision of appropriate retail and leisure uses to deliver the premier leisure destination in London;”	This paragraph was not subject to alterations, and therefore the suggested changes are out of scope.

					<p>that Areas of Limited Change can make an important contribution towards the overall local development needs of the Borough, especially given the minimum number of new dwellings that Table 2 identifies are expected to come forward in Areas of Limited Change (4,260 units).</p> <p>10. Supporting paragraph 3.1.34 describes the Football Club as Haringey’s most significant visitor attraction. Supporting paragraphs 3.1.35 and 3.1.36 describe the Council’s aspirations for the redevelopment of THFC stadium and how further details will be set out in an Area Action Plan. Further comments on the Tottenham Area Action Plan (AAP) are set out below. Under the ‘Spatial Vision for Tottenham’, the AAP describes the THFC Stadium and the area as the “premier leisure destination” in London. THFC are wholly supportive of this objective, however in order to aid the effectiveness of both policy SP1 and the AAP Vision, the aspirations under paragraph 3.1.35 of the Strategic Policies document should be amended as follows (deleted text struck through, proposed text in red):</p>		<p>However, It is important that the term appropriate is retained, to respect the network of centres within the borough.</p> <p>The aspiration to deliver the premier leisure destination is shared however, and is set out in the Tottenham AAP.</p> <p>No change</p>
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Respondent 5: Fairview New Homes Ltd

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
5	RSP27	SP1: Definition of	Yes	Yes	The Council are proposing the site forms part of the designated Wood Green Growth Area which will be further	Not stated	Noted.

		Growth Area Alt30			<p>established through the emerging Wood Green Area Action Plan (the Issues and Options of which is currently out for consultation and our formal representations are detailed later in this text).</p> <p>The orange shaded area is the designated Growth Area. This designation of the site is supported by Fairview and represents the exceptional opportunity that exists to deliver a high quality residential-led mixed use development that will provide new homes on a previously developed, underutilised brownfield site in a highly accessible and sustainable location.</p>		
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Respondent 6: Highgate Neighbourhood Forum

ID	Rep ID	Alt	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RSP28	Alt 64 Section 3.2 para 3.2.29	No	No	<p>Highgate Neighbourhood Forum consider the alterations to SP2 suggested at Alt64 (Haringey's Housing Estate Renewal) to be unlawful and unsound. The reasons for this are summarised as:</p> <ul style="list-style-type: none"> - The policy is unlawful because it has not been prepared in accordance with the LPA's statement of Community Involvement. - The Policy is not justified because it has not been prepared with the participation of the local community and others having a stake in the area. <p>The Policy has not been prepared in accordance with Haringey's Statement of Community Involvement Alt 64 has been completely rewritten following the 'preferred options' consultation (Jan 2015), ostensibly in</p>	The new policy, which replaces 'improving the quality of existing social housing' with 'increasing housing provision' as the driver for estate regeneration/renewal should be removed. Policy wording should make it clear that demolition and reprovision of	The 2015 consultation document included "The building of higher density mixed tenure developments, which increase the quality and range of the affordable

				<p>response to representations made during the consultation. In effect this is a completely new policy paragraph, which abandons the principle of estate regeneration and replaces it with ‘estate renewal’.</p> <p>The previous version the policy expressed that ‘<i>the driver for estate renewal is to improve the quality of the existing social housing stock</i>’ (my emphasis). The new version is instead motivated by the need to ‘meet housing need’, ‘provide greater housing choice’ and ‘cross-subsidise the costs of modernising the existing housing stock’.</p> <p>This is the first time that stakeholders and the local community have been consulted on the inclusion of a policy that allows councils to ‘renew’ housing estates, even if the estates/housing units themselves are not in need of renewal or regeneration. It is the first time that a policy has included the idea of ‘cross subsidy’ and the capitalisation of council-owned assets.</p> <p>The policy alteration also proposes to include a new paragraph (in effect a new strategic policy) to justify the use of council owned land for ‘infill development’. This policy does not include a commitment to build new social or even ‘affordable’ housing on these council owned sites, but simply includes a provision for <i>low cost home ownership</i>. <i>This term is not defined in the plan and its use is misleading and confusing.</i></p> <p>We consider that this proposed alteration does not take into account the views of respondents to the previous consultation and seeks to introduce a new strategic policy, which has not been subject to the full (‘preferred options’) consultation. We therefore consider this</p>	<p>social housing and social housing estates will only take place when there is an overriding need for the estate/and or housing to be regenerated or renewed.</p> <p>If the council wishes to include this new policy of estate renewal in the Strategic Policies DPD, the policy should first be subject to a full consultation in accordance with the SCI.</p> <p>The new policy paragraph introducing the idea of infill on council owned land should be deleted. This is a new policy of ‘infill’, does not belong in estate regeneration or</p>	<p>housing options for local people...” This is in response to the issues of replacing affordable housing being financially difficult. Infill is one option in the delivery of these much needed new affordable homes.</p> <p>As such this is not considered to be a new policy, rather a clarification of the initially proposed position.</p> <p>No change</p>
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					<p>alteration to be counter to the SCI and therefore to be unlawful and the document legally incompliant.</p> <p>The Policy has not been prepared with the participation of the local community and others having a stake in the area.</p> <p>For the reasons detailed above we also consider the document to be unsound, in that Alt 64 of the strategic policies has not been prepared with the participation of the local community.</p>	<p>renewal and has not been consulted upon in accordance with the SCI.</p>	
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Respondent 7: Zena Brabazon

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
7	RSP29	Para 3.2.18	no	No response given	<p>States that the Council “aims to ensure an adequate mix of dwellings is provided” but there is no detail as to how this will be achieved, especially with regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered. (See Tottenham AAP) Given the extensive need in Haringey for social housing for families how can this approach be described as a ‘strategy which seeks to meet objectively assessed requirements?’ The Council says responding to family housing need is ‘a priority for the Council’, so the question is, will this plan address this in making</p>	Not specifically stated	<p>This paragraph was not subject to alterations, and therefore the suggested changes are out of scope.</p> <p>However, the Local Plan, in addition to proposing new housing, also seeks to protect existing family housing, as well as providing a mix of units, including family units. Further detail is set out within the policies of the Development Management Policies DPD.</p> <p>No change.</p>

					provision of family housing for people living here?		
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Respondent 8: Maria Jennings

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RSP30	SP2 Alt50	No	No	<p>Haringey Council's policy intention is to reduce the level of affordable housing on large sites to 60% instead of the current policy of 70% affordable rented.</p> <p>Having reviewed Haringey Council's Evidence Base documents on housing I cannot find any evidence to support this policy change, which would be to the detriment of those in greatest housing need.</p> <p>The key parts for Affordable Housing of the National Planning Policy Framework (NPPF) are:</p> <ol style="list-style-type: none"> 1. Para 47(1) "local planning authorities should use their evidence base to ensure that the Local Plan meets the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing in the housing market area, .." 2. Para 50(1) " plan for a mix of housing based on ...market trends and the <i>needs of different groups</i> in the community.." 3. The NPPF states that affordable housing is "provided to eligible households whose needs are <i>not met by the market</i>". 4. Affordable Rent is housing let to "households who <i>are eligible</i> for social rented housing." 5. Affordable Rent is subject to rent controls 	<p>I respectfully suggest that the adopted Haringey Local Plan Housing Policies for Affordable Housing should stand and the proposed policy to reduce the provision of Affordable Housing should be rejected.</p> <p>With clear evidence of a high need for Affordable Housing, including over 3,000 families in homeless temporary accommodation, and over 1,000 families shipped to temporary accommodation in places as far afield as Liverpool and Birmingham, this proposal for a reduction is not credible. I invite the Inspector to ask</p>	<p>During the preparation of the Local Plan, a viability study was commissioned which indicated that achieving 50% affordable housing across the borough on deliverable sites was not viable.</p> <p>The Council is undertaking a range of methods to boost the production of affordable housing, and the Local Plan support these by enabling planning consent to be granted to projects which will deliver new affordable homes. This includes a range of</p>

				<p>that require a rent of <i>no more than</i> 80% of local market rent.</p> <p>It is most important to note that the NPPF is clear that there must be a difference between market housing and affordable rented housing.</p> <p>Haringey Council’s original Housing Planning Policies were adopted before the current NPPF. The proposed Housing Planning Policies do not conform to the NPPF, despite the requirement to do so. Haringey Council has failed to objectively assess needs for Affordable Housing, and it has failed to assess the needs of families and disabled people in particular, as is required. As a consequence of having failed to assess the need for Affordable Housing</p> <p>Haringey Council has failed to ensure that its Local Plan meets the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing.</p> <p>Haringey Council’s evidence base documents demonstrate that land is available and that affordable housing is economically viable on <i>all</i> sites generating positive residual values (all housing development costs having been taken into account) of up to £14m.</p> <p>Haringey Council’s evidence base documents that consider the need for affordable housing are:</p> <ul style="list-style-type: none"> - LBH Strategic Housing Market Assessment May 2014 produced by commercial property valuers GVA Grimley Ltd. 	<p>Haringey Council to produce Housing Policies for households whose needs are <i>not</i> met by the market and to produce a Local Plan which meets the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing.</p>	<p>infill developments, and private-led developments as well as housing estate renewal projects.</p> <p>The change to 60% affordable rent from 70% will improve viability on sites, and help to underpin delivery of renewal projects, thereby delivering new affordable homes. It is also consistent with the Further Alterations to the London Plan.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement of Community Involvement.</p>
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				<p>- Haringey Council Housing Needs Assessment June 2007 produced by Fordham Research Ltd.</p> <p>Unfortunately, neither document is robust and credible for different reasons, which are set out below.</p> <p>Haringey Council Housing Needs Assessment June 2007 produced by Fordham Research Ltd.</p> <p>- This report though dated June 2007 on the front cover is detailed as 2005 in the left hand page header and it was clearly written in 2005. It seems that whoever decided to change the front cover failed to change the date in the left hand header inside the document which states 2005.</p> <p>- This report does provide a detailed and <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing and it considers the <i>needs of different groups</i> but only for 2005 and it does so using different guidance that was current at the time.</p> <p>- Figure 10.1 (page 85) states that Haringey is a borough with a very high need for new Affordable Housing, considerably greater than for inner London as a whole and almost twice as high for outer London as a whole. This was clearly justifying the target for 70% of affordable housing to be for rent. Given Haringey's context of low levels of provision of Affordable Housing together with very high housing costs and very low incomes a very</p>		No change
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				<p>high need for new Affordable Housing was to be fully expected. Given the real increases in housing costs and decline in real median incomes it is only to be expected that the need for Affordable Housing in Haringey has increased in the last 10 years.</p> <ul style="list-style-type: none"> - As the information in this report is well over 10 years old it cannot be robust or credible, and it certainly forms no basis for justifying a reduction in the provision of new rented Affordable Housing from 70% to 60%. <p>LBH Strategic Housing Market Assessment May 2014 produced by commercial property valuers GVA Grimley Ltd.</p> <ul style="list-style-type: none"> - This report relies very heavily on census data from 2011 and it fails to consider the current guidance on Housing and Economic Development Needs Assessments in a number of respects. The Planning Practice guidance on methodology for assessing housing need requires that overcrowding and homelessness be considered as a key market signals, (the guidance signposts to government held homelessness statistics prepared by local authorities in quarterly P1E returns) but GVA simply assume homelessness as part of the housing waiting list. - Some tables are referenced GVA but there is no indication of the source of the data. At least one table is referenced Haringey Housing Needs Survey 2013 but no trace of any such survey can be found. - Unfortunately this report does not provide a <i>full</i>, objectively assessed needs for <i>market</i> 		
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					<p><i>and affordable</i> housing and it fails to consider the <i>needs of different groups</i> despite the availability of clear and concise guidance. The NPPF which has been in place since 2012, well before the report was written, is clear that a Local Plan shall meet the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing.</p> <ul style="list-style-type: none"> - The current Planning Practice guidance has also been in place well before the report was published but does not seem to have been followed. - The housing market area has been incorrectly drawn, with Waltham Forest excluded from the housing market despite being the third most important place for net outward migration (figure 5). - The report in several places seems to fail to follow logic. Figure 41 fails to present CACI median incomes but confirms that CACI lower quartiles incomes are below £20,000 for over three quarters of households in the borough. Table 38 sets out buying a home on the open market is affordable to 60% of households with an income of between £20,000 and £25,000 paying a yearly mortgage of £21,864. This is clearly not coherent and even those households with an income of £25,000 would be left with a disposable income after housing costs of only £60 per week. - The report appears to have several confusions about Welfare Reform and benefit caps. There is reference to a Housing Benefit cap of £500 per week for families on low incomes for families to rent privately. This is 	
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					<p>incorrect and there is a Housing Benefit to the level of the 30th percentile of local market rents, and an Overall Benefits Cap for families taking into account all their benefits (including Housing Benefit) of £500 which is being reduced shortly as part of the government changes to welfare policy.</p> <ul style="list-style-type: none"> - The report conflates the need for affordable housing with affordable rent. Table 40 which purports to examine affordability is indicative of the confusion as affordable rent is shown to be unaffordable to 75% of households whilst buying a home on the open market is unaffordable to only 65% of households. Table 48 appears to do the same suggesting that buying a home on the open market is far more affordable than affordable rent. - Table 62 assumes that there are 1,597 vacant social/ affordable dwellings that can be brought back into use and that there are no dwellings to be demolished. Given the very small affordable housing stock in Haringey such a high vacant property rate figure must be questioned. Similarly Haringey Council has been publicising its plans to demolish large amounts of its council housing for some time so the figure, which is given as zero cannot be correct. <p>The evidence base used by Haringey provides an indication of a high level of need for affordable housing. This is consistent with Office for National Statistics data and the very accessible data about Haringey on the London Poverty Profile website which shows that</p>	
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				<p>lower quartiles rents in Haringey are £1.257 for a two bedroom property and that such rents would demand 74% of lower quartile incomes.</p> <p>London's poverty profile (hyperlink edited for formatting reasons – see full response for address)</p> <p>The GVA report does demonstrate without doubt that Affordable Rent at 80% of market (mean and median) rents are not affordable to “households whose needs are <i>not</i> met by the market”. The Housing Policies within the Haringey Local Plan do not meet the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing, especially so in respect of the need for affordable housing. Simply calling a product affordable does not mean that it is affordable and the NPPF is clear that a Local Plan must address the needs of those whose housing needs cannot be met by the market. In those areas where there is little difference between social rents and market rents, e.g. North East, North West and Yorkshire & Humber, affordable rents of 80% market rent make sense, however that is clearly is not the case in areas where market rents are high, as they are inevitably unaffordable.</p> <p>My evidence invites the Inspector to reject the proposed changes to the Housing Policies in the Haringey Local Plan because they reduce the provision of Affordable Housing and those policies do not conform to the current NPPF. My evidence also invites the Inspector to</p>		
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					<p>reject the proposed changes to the Housing Policies as they are not in conformity with the London Plan policies for family housing or housing for people with disabilities.</p> <p>The Inspector may wish to note that Haringey Council's consultation process makes it far more difficult to make a comment than very many other LPAs</p>		
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Respondent 9: Anne Gray

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RSP31	Paras 1.3.1 1.4.10 1.52.1 3.2	No	Not stated	<p>I believe that the plan is unsound on grounds of :-</p> <p>1) it is not the most appropriate strategy when considered against the alternatives</p> <p>2) therefore it is not effective</p> <p>I have issues about:-</p> <p>a) the low amount of</p>	<p>a) The low amount of affordable housing</p> <p>Under SP2, the target should be re-set at least 50%, given that the strategic housing market assessment says that 58% of the local population cannot afford a rent as high as 80% of market levels and given the plan's own admission in para 1.3.1 that 59% of total net additional homes need to be 'affordable'. Otherwise a lot of current residents will have to move further away from central London, with consequent difficulties for their employment and a higher demand on transport facilities as their jobs will not necessarily move with them.</p> <p>b) The excessive reliance on a small number of powerful large private developers to get housing built</p> <p>The plan needs to be considered alongside the Council's adopted policy of working with Spurs as a major player, and its adopted proposal to set up a</p>	<p>The maximum amount viable across the borough is 40% as demonstrated through the Viability Study which informs the Plan.</p> <p>It is not considered that the Local Plan discriminates against small developers, housing co-ops, refurbishment or infill developments. All of these methods will</p>

				<p>affordable housing, the target should be re-set at least 50%</p> <p>b) the excessive reliance on a small number of powerful large private developers to get housing built,</p> <p>c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes</p> <p>d) the absence of attention to energy saving and local power generation</p>	<p>single joint venture company with 50% developer equity (and control) to which many sites in Wood Green and Northumberland Park will be transferred. This gives enormous bargaining power to these two private interests. Spurs have already negotiated away much of their s.106 contribution to the redevelopment of the football ground area and have been given planning permission for two huge towers with no ‘affordable’ housing. There are huge risks attached to dependence on the market destiny of a handful of companies.</p> <p>The Council should be seeking to sub-divide sites to facilitate development proposals from smaller builders and from community led organisations (such as housing coops, community land trusts, or development trusts). It has 15 years to facilitate the development of the latter category, of which at least 3 already exist in Haringey.</p> <p>I am agnostic as to where would be the best place in the ‘strategic policies’ document to say this, but something is needed along the lines of:-</p> <p>‘ The Council will seek to diversify its array of development partners by encouraging community led development organisations such as housing coops and non-profit trusts to come forward, request sites and discuss proposals, and where appropriate will help them with formulation of proposals and searches for sources of finance pre-planning-application. It will also encourage smaller London-based building companies to put forward proposals for just part of a site defined in the Site Allocation Documents where this is likely to produce value for money and speedy use of the available land.</p>	<p>contribute to providing the affordable housing that the borough needs and specific policies encouraging these forms of development are provided for in the Development Management Policies DPD (see Policies DM14 & DM16).</p> <p>While the Council is beginning to create its own development capacity, it is recognised that this will not be sufficient to meet the needs identified. It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough’s needs are</p>
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					<p>The Council will not tolerate land being left undeveloped for more than xx months (xx = 10?) following the grant of planning permission. Once a s.106 contribution has been agreed, planning permission may be revoked if this agreement is not adhered to and appropriate funds must be placed in an escrow account before building regulations approval can be finalised.</p> <p>The Council may require as a condition of planning permission that units should not be offered for sale 'off plan' except to RSLs or organisations offering to 'sell on' for shared ownership'.</p> <p>This last provision is to avoid off-plan sales which favour cash buyers, often foreign companies, at the expense of local owner occupiers. It would mean facilitating a 'bridging loan' arrangement by shared ownership providers so that someone who cannot get a mortgage until the building is completed can obtain a shared ownership deal to start off with and then buy out the rented share as soon as s/he can obtain a mortgage, maybe within months.</p> <p>Following the example of Islington Council, steps need to be taken against the 'buy to leave' practice. Therefore somewhere the policies should say something like:-</p> <p>'New homes should be occupied by a resident within 3 months of completion, otherwise the Council reserves the right, as a condition of planning permission, to nominate a suitable occupant or to require letting to a registered social landlord. Evidence of genuine</p>	<p>delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>Requiring sites to be sold in a certain way, or to be built a certain time after permission, is not within the scope of the Local Plan. The Planning Obligations SPD does provide a clawback mechanism that enables sites which have taken a number of years to be delivered to be reassessed for affordable housing proportions when the sales values become known.</p> <p>Refurbishment is</p>
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					<p>residential occupancy, such as the name and workplace of the occupant, and records of use of electricity and water, may be required in cases of doubt.'</p> <p>Also in question should be use of new homes for 'air b and b' type lettings. Where permission is granted for a residential development, it should be considered a breach of that permission if hotel-type use, with more than say 8 different occupants in a year in the same dwelling, is subsequently discovered.</p> <p>c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes</p> <p>The plan is focussed on meeting the new homes target by building on large sites, often to excessive height especially around Tottenham Hale. Spontaneous action to expand the existing housing stock upwards or sideways is neglected unless it is envisaged in a brief mention of 'windfall sites' in para. 3.2. But expanding and making better use of existing buildings has considerable potential, for example by:-</p> <p>1) reducing the void rate of the housing stock. In particular this could be done by reducing turnover of private tenants. Typically private landlords are now letting for as little as 6 months at a time. When they do so the property may well be left empty for a week between lettings, so that extending the length of tenancy from 6 to 12 months would reduce the average void % of a number of private-rental dwellings at any one time from 1/26 to 1/52, that is from approximately 4% to approximately 2%. The Council should set up a low-profit municipal lettings agency to offer 12 month</p>	<p>being carried out on a range of housing sites across the borough.</p> <p>The turnover of private rented properties is outside the scope of the Plan. The bringing forward of space above shops is already supported through the Plan. The Government has already relaxed Permitted Development rights for rear extensions. The Council wishes to ensure through its planning policies that these do not negatively impact upon neighbours' amenity. There are policies governing the creation of new decentralised energy networks in the DMDPD.</p>
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					<p>tenancies, setting a model and a competitive force in the market which would reduce the void rate and improve tenants' security. This could be included as an additional strategic policy, worded something like:-</p> <p>'The Council will seek to reduce the turnover in private lettings by working with landlords to achieve longer tenancies and thus reducing the proportion of properties empty at any one time due to tenant changeover, possibly by acting as intermediary between tenants and landlords to offer tenancies of 12 months or more '.</p> <p>2) encouraging owners and business tenants to make better use of flats above shops, which are often merely used for storage and in poor repair. For example, a policy could be:-</p> <p>'The Council will conduct surveys every 2-3 years of town centre and minor shopping parades to identify unused or under-used accommodation above shops and offices which could be brought or returned into residential use. It will work with owners to effect such re-use, through project-managing re-use, helping to identify contractors and suitable finance, finding tenants, and guaranteeing rents where appropriate. In some instances such premises could be made available to homeless families. '</p> <p>3) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. Owners could be encouraged by offering council tax concessions (no re-banding of the enlarged building for x years, or extension of the</p>	No change
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					<p>single-occupancy council tax concession for 1 or 2 years for a lone-dwelling owner who creates one or two habitable rooms for persons living with them as relatives or as lodgers in a family environment. This is not to encourage HMOs but rather for families to accommodate a young person who might otherwise have to move away (but often cannot now afford to) or to take in an aged parent, or a student or young migrant worker as a lodger. Many first floor flats (for example in my own street, Sirdar Road, N22) could be enlarged to accommodate a family with children, rather than just a couple, by addition of an attic conversion room.</p> <p>Following the lead of Zac Goldsmith's recent statement (http://www.standard.co.uk/news/mayor/zac-goldsmith-add-two-storeys-on-public-buildings-to-help-solve-london-housing-crisis-a3189821.html), a large number of small sites for additional dwellings could be obtained by:-</p> <ul style="list-style-type: none"> - building an extra floor or two on top of single storey shops or other commercial premises - building over small car parks so that parking remains underneath residential buildings but is not the only use of the site - adding extra floors to public buildings - adding extra wings to existing blocks of flats, especially in the more spacious west of the borough and on medium-rise council estates some of which have ample land space around the blocks. Wherever there is a blank wall or a staircase at the end of a 	
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					<p>building, such additions might be possible.</p> <p>The plan could say:-</p> <p>‘The Council will undertake a survey of potential small sites for housing development consisting of addition of extra floors or wings to existing buildings, whether commercial or residential, or building on stilts over car parks, with a target of xx (=100 per year ?) units to be built in these ways across the borough, and encourage existing owners or community-led development organisations to make use of the sites identified with a view to providing social rented accommodation</p> <p>Further potential for freeing up accommodation for people who really want to live in Haringey could be obtained by offering older people who want to move out of London, especially owner occupiers who are under-occupying 3 or 4 bedroom homes, logistic help to move. I have written a further paper on this topic which can be supplied if it is of interest.</p> <p>d) the absence of attention to energy saving and local power generation:-</p> <p>The strategic policies are surprisingly silent on these issues, particularly given Haringey’s recent attention to a ‘green borough’ strategy.</p> <p>They should include something along the lines of:</p> <p>‘All developments over xx units should be expected to make a contribution to reducing carbon emissions and averting fuel poverty, by such features as: solar panels, recycling of grey water or rainwater, thermally effective</p>	
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						district heating systems, lighting in stairs and passages controlled by movement sensors.	
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Respondent 10: Lynne Zilkha

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RSP32	Alt 53 Para 3.2.29	Not stated	Not stated	Haringey Housing Estate Renewal - there should be added a provision which will adopt a policy of providing equivalent property for leaseholders who are displaced in the estate or the area and to offer independently assessed market rates for the leases. Anything less would be unfair and unlawful.	Not specifically stated	The provisions for affected tenants and leaseholders on housing estate renewal sites in not an issue controlled by the Local Plan's policies. This is however set out in the Council's Housing Strategy and follows Housing Act requirements. No change
10	RSP33	Alt 22 Para 1.3.62	Not stated	Not stated	"Council is exploring opportunities to create a Cultural Area at Alexandra Palace to link up with the existing Cultural Quarter at Wood Green" This isn't strictly correct as Alexandra Palace has a long standing tradition as a leading music, entertainment and leisure use from inception to this day.	Not specifically stated	The Council stands by its aspiration to optimise the offer at Alexandra Palace. No change

Respondent 11: Home Builders Federation

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
11	RSP34	Para 3.2.13	Not stated	Not stated	In paragraph 3.2.13 the council refers to the Lifetimes Homes Standard. The Lifetime Homes Standard is now defunct as a standard. It is no longer one the Government recognises following its housing standard review.	Not specifically stated	This paragraph is not proposed for amendment in the Local Plan, and as such is not the subject matter of the Examination. The Government is clear that extant policies can remain. Nevertheless, the London Plan

					<p>The council should update this policy and section of the local plan to reflect the new London Plan which includes the minor alterations of the London Plan in the minor alterations to the London Plan the Mayor has stimulated that 90% of new homes provided should be built to the Part M 4 (2) adaptable and accessible homes standard and 10% should be built to Part M 4 (3) which is the wheelchair accessible homes standard. Lastly, the 10% for Part M4 (3) should only be applied to the affordable housing element.</p> <p>The Council should amend its plan accordingly to reflect the new minor alterations to the London Plan.</p> <p>The Council should also be aware of the minor alterations to the London Plan and its recognition that the ability to build homes for the wheelchair home standard i.e. part M for 3 does represent a challenging term of liability therefore the Council should apply the policy flexibly and keep it under review in case it has an advert effect on mobility.</p>		<p>alterations have picked this matter up and its new London Plan policies supersede those of the Local Plan.</p> <p>No change</p>
11	RSP35	Para 3.2.14	No	Not stated	Paragraph 3.2.14 is unjustified and the Council cannot seek a more aspirational target of 20% wheelchair acceptable homes. If it wanted to	Not specifically stated	This paragraph is not proposed for amendment in the Local Plan, and as such is not the subject matter of the Examination. The Government is

					have a target of 20% wheelchair acceptable home it would need to undertake the necessary evidence gathering and liability assessment to demonstrate that is viable and is required.		clear that extant policies can remain.
11	RSP36	Para 3.2.19 Alt59	No	Not stated	<p>We note paragraph 3.2.19 of the draft local plan. This specifies a strategic tenure split of 60% affordable rent including social rent and 40% intermediate. Firstly, a tenure split of 60% affordable rent including social rent is ambiguous. The council will need to reflect the outcomes of its local plan viability study and what has been assumed in the modelling for affordable rent and social rent since these are not the same thing. Social rented dwellings will tend to be more expensive to provide because it is a tenure that requires a higher level of subsidy because the rental income is weaker.</p> <p>Secondly, it is also unclear what the applicant is expected to provide in terms of the rented element of the tenure. The local plan should not be ambiguous about this. It should provide clarity to enable applicants to be able to advance applications with a clear knowledge of what is expected by the local plan. Equally, the decision-taker should know from the local plan how s/he is to</p>	Not specifically stated	<p>It is not clear how this is ambiguous. The policy accords with the London Plan, and is further amplified by Policy DM13 of the Development Management Policies DPD.</p> <p>No change</p>

					<p>determine application. This part of the local plan is ambiguous and contrary to national policy on the need for clarity in local plans. . The local plan will need to be amended to clarify how many homes are to be provided as affordable rent and how many as social rent.</p> <p>The Council should also take into account the forthcoming requirement of the housing and planning bill. This will include starter homes within the definition of affordable housing the Council should amend the plan to make it clear that starter homes can be provided as a form of affordable housing.</p>		
11	RSP37	Para 3.2.9			<p>Paragraph 3.2.9 refers to Building for Life. This design guide has been replaced by Building for Life 12. The local plan should be amended to reflect this. BfL12 cannot be applied proscriptively by the Council. It is a voluntary scheme.</p>	Not specifically stated	<p>This paragraph is not proposed for amendment in the Local Plan, and as such is not the subject matter of the Examination. The Government is clear that extant policies can remain.</p>

Respondent 12: Rapleys on behalf of LaSalle Investment Management

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	RSP38	1.3.45 (Alt ref: 17)	No	Not stated	<p>The proposed alteration states that the London Plan designates Haringey Heartland/Wood Green as an Area of Intensification with potential to deliver approximately 2,000 new jobs and 1,000</p>	<p>We request that the reference to the number of jobs and new homes are amended as follows:</p>	<p>The Council does not consider that this adds any clarity to the Plan, especially as the alterations to SP1 (Table</p>

					<p>new homes as part of a mixed use development. The capacity identified in the proposed alteration is not in line with the London Plan’s approach i.e. an <u>indicative capacity</u> of 2,000 jobs, and a <u>minimum of</u> 1,000 new homes.</p> <p>We therefore <i>object</i> to the proposed alterations, as they are not consistent with the 2015 London Plan to secure an increased capacity to meet and <i>exceed</i> the housing target through redevelopment in Haringey Heartland/Wood Green.</p>	<p>“...with potential to deliver approximately <i>an indicative capacity of</i> 2000 new jobs and a <i>minimum of</i> 1,000 new homes as part of mixed use development”</p>	<p>2) clearly set out that within the Haringey Heartlands/Wood Green area the Local Plan seeks to deliver 4,595 homes. Further, across the Local Plan, provision is made to meet and exceed the Borough’s strategic housing requirement.</p> <p>No change</p>
12	RSP39	Strategic Objective 2 (Alt ref: 27)	No	Not stated	<p>Strategic Objective 2 (Alt 27) – It is noted that the revised housing requirement is calculated on the basis of the requirements from 2011-2014 based on the previous Local Plan annual target of 802, and from 2015-2026 based on the adopted 2015 London Plan annual target of 1,502. Whilst we do not necessarily object to the housing target being calculated, it is not consistent with the London Plan’s requirement to identify the objectively assessed housing needs to seek to <i>exceed</i> the London Plan target.</p> <p>In this regard, the London Plan Policy 3.3 requires that Boroughs should seek to achieve and <i>exceed</i> the minimum annual housing target as part of the Local Plan preparation. Furthermore, it requires</p>	<p>and consider that strategic objective for housing needs should expressly state that it will seek to meet and <i>exceed</i> the London Plan target in line with the amendments to Policy SP2 (ref: Alt30).</p>	<p>The Council does not consider that this adds any clarity to the relevant Policy SP2 which states ‘meet and exceed’.</p> <p>No change</p>

					Boroughs to draw on the housing benchmarks in developing their Local Plan housing targets, augmented where possible with extra housing capacity and to seek to enable additional development capacity, particularly brownfield housing capacity, through, inter alia, intensification areas and mixed use redevelopment. We therefore <i>object</i> to the proposed alterations.		
12	RSP40	Table 2 (Alt ref: 32)	No	Not stated	<p>Figure 1 and Table 2 (ref: Alt 31 and Alt 32) – Whilst we support the principle of identifying a broad distribution for housing in each of the Growth Area, we are concerned that the table and figure do not correspond. More specifically, Figure 1 does not provide a boundary of Haringey Heartlands and Wood Green Metropolitan Town Centre, while Table 2 identifies broad housing distribution for each area. In order to allow for flexibility in the emerging Site Allocations DPD and the AAP to refine the housing distribution, we consider that the housing distribution should be amalgamated.</p> <p>We <i>support</i> the amendment made to Table 2 to include the wording ‘<i>minimum</i>’ in respect of the broad housing distribution in response to our previous representations, as this would be consistent with the requirement to exceed the London Plan’s housing requirements.</p>	Not specifically stated	<p>Table 2 corresponds with the sites identified in the Site Allocations and Tottenham AAP.</p> <p>No change</p>

					It is not clear how the capacity and distribution of new housing has been identified, as there is no evidence base document available. We request a further opportunity to comment on Table 2 once evidence base for this table is made available.		
12	RSP41	3.1.11 (Alt ref: 33)	No	Not stated	<p>The proposed alteration states that the London Plan designates Haringey Heartland/Wood Green as an Area of Intensification with potential to deliver approximately 2,000 new jobs and 1,000 new homes as part of a mixed use development. The capacity identified in the proposed alteration is not in line with the London Plan’s approach i.e. <u>an indicative capacity</u> of 2,000 jobs, and <u>a minimum of</u> 1,000 new homes.</p> <p>We therefore <i>object</i> to the proposed alterations, as they are not consistent with the 2015 London Plan to secure an increased capacity to meet and <i>exceed</i> the housing target through redevelopment in Haringey Heartland/Wood Green.</p>	<p>We request that the reference to the number of jobs and new homes are amended as follows:</p> <p>“...with potential to deliver approximately <i>an indicative capacity of</i> 2000 new jobs and a <i>minimum of</i> 1,000 new homes as part of mixed use development”</p>	<p>The Council does not consider that this adds any clarity to the Plan, especially as the alterations to SP1 (Table 2) clearly set out that within the Haringey Heartlands/Wood Green area the Local Plan seeks to deliver 4,595 homes. Further, across the Local Plan, provision is made to meet and exceed the Borough’s strategic housing requirement.</p> <p>No change</p>
12	RSP42	SP2 (2) (Alt ref: 48)	Yes	Not stated	<p>We <i>support</i> the Council’s amendment to replace “complies” with “is designed having regard to” in respect of Criterion 2 on the use of the housing design and space standards set out in the Mayor’s Housing SPG (2012) and the London Plan, and the play space standards set</p>	Not stated	Noted.

					out in the Mayor's Play and Informal Recreation SPG (2012).		
12	RSP43	SP2 (5) (Alt ref: 49)	No	Not stated	We note that Criteria 5 and 6 have amended the affordable housing requirement, based on the viability assessment. The Council's evidence on viability assessment shows that the mixed use development on a site within Haringey Heartland/Wood Green is unviable if it were to provide 30% affordable housing provision. We consider that a lower percentage should be set for development in Haringey Heartland/Wood Green, on the basis of the Council's viability evidence, to ensure viability and deliverability of the sites allocated for redevelopment/regeneration.	We therefore <i>object</i> to setting the borough-wide affordable housing target, and for Haringey Heartland/Wood Green the target should be lower than 30%.	Affordable housing will be determined on a site by site basis, having regard to viability of schemes. It is considered that overall, a 40% affordable housing target, on a habitable rooms basis, across the borough is deliverable. No change

Respondent 13: DP9 on behalf of KA Investments (Safestore Ltd)

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RSP44	SP2	Not stated	Not stated	KA Investments supports the increased targets for new homes in Haringey set out in amended Strategic Policy SP2. KA Investment's notes that amended Policy SP2 seeks to reduce the level of affordable housing sought in schemes of 10 or more units, from 50% to 40% and alters the desired tenure split from 70% affordable rent / 30% intermediate rent to 60% affordable rent / 40% intermediate rent. KA Investments supports these proposed amendments as they reflect the tenure split advocated in the London Plan and further ensure that the delivery of affordable housing will not harm the overall delivery of housing.	Not stated	Noted.

Respondent 14: Marco Consolaro

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
14	RSP45	SP4	No	No response given	The green link as a "very distinctive sign" of the redevelopment which needs to be in a straight line and have a bridge over the railroad must be an idea that came up at the pub. Let's use those money for something more concrete and let's improve the access to the Lea Valley at the north side of Down Lane Park which is a place we are scared to go in the evening instead!!!	Forget the Green Link and make many green links using Down Lane Park as the natural bridge between the High Road and Lea Valley. Improve all the communication links between the park and the High Road especially the entrance to the Lea Valley Park from Park View Road	The Council supports improving both links. No change

Respondent 15: GL Hearn Limited obo Capital and Regional Plc

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	RSP46	SP 8 Alt70	No	No response given	Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.	Having regard to the above, we consider that the reference to ' ...and other non-designated employment sites' in the first paragraph of the policy should be deleted.	Ultimately it will be important that both designated and non-designated sites contribute to meeting Haringey's jobs need/target . Removing this aspiration is harmful to achieving the jobs target for the Borough. It is noted that The

				<p>Policy SP8 has been altered in the pre submission draft from that in the preferred options version to extend protection under the terms of the policy to 'other non-designated employment sites' as well as Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas. We object to the extension of the policy in this way. The same level of protection should not apply to all employment sites within the Borough.</p> <p>Under the heading building a strong, competitive economy, paragraph 21 of the National Planning Policy Framework (NPPF) indicates that investment in business should not be overburdened by the combined requirements of policy expectations. It is noted that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Paragraph 22 notes that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purposes and that alternative use of land and buildings should be treated on their merits having regard to market signals and the relative need for different land uses.</p> <p>In our view, the focus of the policy should be on the most important employment sites as set out within the existing policy with a more flexible approach allowed for non-designated employment sites having regard to market</p>		<p>Mall, while containing some employment floorspace, is predominantly retail, with residential above, and as such the effect of SP8 on this site will be limited.</p> <p>No change</p>
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					<p>signals and relative need for different land uses. It appears that the inclusion of other non-designated employment sites has been added to the policy as a 'catch all', since there is no expansion within the remainder of the policy or supporting text as to the Council's approach to other non-designated sites.</p> <p>We therefore consider that the addition of the text is unsound by reason of being unjustified and contrary to national planning policy guidance.</p>		
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Respondent 16: Colliers on behalf of Diamond Build PLC

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	RSP47	SP8 Alt110	Yes	Not stated	<p>Our client is encouraged by draft Policy SP8's recognition that Local Employment Areas require a more flexible approach to the uses within them, due to the characteristics of individual sites and their surrounding area. In particular, there is a clear identified need to provide the most flexibility to defined Regeneration Areas. This is to ensure that a key objective of the Local Plan, urban renewal, is achieved. The inclusion of "Tottenham Hale, (Part SIL/RA), N17" as one of the defined Local Employment Areas, classified as a Regeneration Area, is supported. It is considered justified, effective and consistent with national policy.</p>	Not stated	Noted.

Respondent 17: North London Waste Authority

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RSP48	Alt110	Not stated	Not stated	The Authority notes that the document uses the term ' <i>Friern</i>	It is recommended that there is a change in the	Noted, this will be amended through a

					<i>Barnet Sewage Works</i> at Alteration 110, paragraph 5.1 when referring to the ' <i>Pinkham Way</i> ' site. ' <i>Pinkham Way</i> ' is the term that is used in the Site Allocations DPD, so there is inconsistency in the names of the same site which is referenced in both the proposed alterations to Strategic Policies and the Site Allocations DPD.	terminology used in the document to replace the reference to ' <i>Friern Barnet Sewage Works</i> ' with reference to ' <i>Pinkham Way</i> ' which is the term that the Site Allocations DPD has adopted. A change would ensure that both documents are consistent.	minor alteration.
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Respondent 18: Janet Shapiro

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
18	RSP49	SP 13	No response given	No response given	Existing rules are not stringent enough to avoid loss of open space.	SP13 should be examined to see how the regulations and council scrutiny can be tightened up.	The response related to matters not subject to alterations and are therefore outside the scope of the consultation. Nevertheless, it is considered SP13 offers significant protection to open space. No change

Respondent 19: Canal and River Trust

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RSP50	Not stated	No response given	No response given	The Trust has no comments to make on this consultation, and are pleased to note the reference to the TCPA's Policy Advice Note: Inland Waterways, in the	Not stated	Noted.

				evidence and references.		
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Respondent 20: Our Tottenham

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
20	RSP 51	SP2 Alt4 7	No	Not stated	<p>We argue that several policies and proposals made in the <i>Alterations</i> do not meet the existing local communities' requirements (from both residents and businesses). On the contrary, they represent an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. This particular affects Tottenham, as a significant amount of foreseen of development is concentrated in this part of the Borough (see our separate response to the Tottenham AAP).</p> <p>Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). The <i>Alterations</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.</p> <p>a) In several ways the <i>Alterations</i> do not fulfill, or they contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING, in particular: 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are</p>	Not specifically stated	<p>Urban Characterisation work undertaken by the Council identifies that the borough is a mix of urban and suburban areas.</p> <p>The Local Plan clearly seeks the maximum amount of affordable housing viable on each site. This will help to</p>

				<p>proud of’.</p> <p>b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment (http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf, p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The <i>Alterations (Para 3.2.18)</i> state that the Council ‘aims to ensure an adequate mix of dwellings is provided’ but there is no detail as to how this will be achieved, especially with regard to social housing for families.</p> <p>The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered (see Tottenham AAP). Given the extensive need in Haringey for social housing for families, how can this approach be described as a ‘strategy which seeks to meet objectively assessed requirements?’ The Council says responding to family housing need is ‘a priority for the Council’, so the question is, will this plan address this in making provision of family housing for people living here?</p> <p>The proposals for the “renewal and improvement” (including demolitions) of the council housing estates listed in SP2 point 10, p. 42, do not include comprehensive detailed options for re-housing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing</p>	<p>meet local affordable housing need.</p> <p>In order to build the homes that will help to meet housing need, densities are required to increase. Thus increasing density is required to meet need, not cover costs. Existing family housing is to be protected from loss through conversions.</p> <p>Replacement affordable housing will be provided on all estate renewal projects involving demolition on a per square metre basis. This</p>
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				<p>need. A large consultation exercise carried out by the Council to gauge people’s priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.</p> <p>There are serious questions which need to be answered regarding the concept of ‘rent’. ‘Affordable’ levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to rent in many buildings (see next section).</p> <p>c) The Council’s Sustainable Community Strategy (2010-2016)³ states ‘We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes’. With Government cuts and caps to benefits affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the <i>Alterations</i> rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-2019 challenges the concept of 80% market rent being a suitable ceiling of ‘affordability’, works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme⁵ focuses on identifying small infill sites within existing council estates and building on them subject to detailed consultation work with local residents. The plan needs to provide enough social housing to meet the needs of Haringey’s housing waiting list within a 5 year</p>		<p>will allow replacement stock to better meet local need.</p> <p>Affordable rent is a national and regional planning policy, and is prioritised through the grant regime by the GLA.</p> <p>The Council is building smaller infill developments as well as looking at more comprehensive redevelopments. Many of these do not require an allocation however.</p> <p>Building more houses, including affordable houses, will have a beneficial impact on the housing waiting list.</p> <p>The Housing Strategy says more on ‘affordable rent’ rent levels.</p>
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				<p>period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and substandard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.</p> <p>In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any further increase in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need at least 16,300 social rented units over 15 years or 1,066 per year. This is more than 100% of the previous building targets for all types of housing before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing needs in other boroughs which are currently less crowded or in 'new town' type developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2.</p> <p>Remarkably, Haringey Council's own Joint Strategic Needs</p>		<p>Viability testing identified that 40% was the maximum viable housing target within the borough.</p>
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				<p>Assessment states that ‘to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required’ (see http://www.haringey.gov.uk/social-care-andhealth/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsnahousing#levelofneedofpopulation). This simply cannot be achieved without overspill to other areas. But it is clear that the <i>Alterations’ target of only 40% of units to be ‘affordable’</i> is absolutely inadequate and there is little clarity that ‘affordable’ would include social rented housing which families in Tottenham on low incomes could afford.</p> <p>In asking if this plan is justified, one of the required criteria is ‘evidence of participation of the local community and others having a stake in the area’. There is not enough evidence of community participation encouraged or promoted by the LPA in this final round of consultation which goes beyond a minimum. Independently of this part of our submission, we presented a more detailed analysis of the consultation process and its shortcomings (see text box below). The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended. This is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs for several weeks. The Council’s borough-wide magazine <i>Haringey People</i> – which goes to households directly – did not include one word or reference to this consultation (see http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-peoplearchive). This would have been the most effective method for directly communicating with residents.</p>		<p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement of Community Involvement.</p>
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				<p>The documents are hard to read on line yet active residents' groups had to ask and press for printed copies in order to meet with their members.</p> <p>The Supreme Court in the Moseley v Haringey Council judgement set out conditions for fair consultation. Amongst the four criteria it states that 'the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.' It is questionable as to whether this condition to allow for 'intelligent consideration and response' has been met with regard to this vital consultation on the Local Plan.</p> <p>We would like to challenge some key assumptions and evidence base used to justify the Alterations to Policy SP2 HOUSING under 3 broad themes: Overall scale of housing growth and implications for existing and future social infrastructure The question of affordability The chosen approach to housing provision and to 'housing estate renewal'</p> <p>1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure</p> <p>a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were adopted in March 2015. The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP. The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the GLA SHLAA - an 83% increase.</p> <p>This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The distribution of targets across London Boroughs</p>		<p>Options are often limited where the Local Plan must be in conformity with the London Plan and national planning policies, and the requirement that policies be justified (i.e. supported by robust evidence) and deliverable.</p> <p>The Local Plan shows how FALP housing targets can be met. As stated, the opportunity to challenge the spatial distribution of London's growth was through the London Plan Alterations. Having been the subject of due process, including an examination in public, and found sound, the</p>
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				<p>displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly context and oppose this massive increase affecting the Borough of Haringey. We made a submission during the public consultation on the Further Alterations to the London Plan in 2014 (here https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf) and presented evidence at the EiP at Session 2b (Housing need and supply) on Wednesday 3 September 2014 to make this argument. It was ignored in the subsequent version of the FALP post-EiP. These figures are unsustainable, unrealistic and unfair. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. In the response by the LB Haringey to the consultation on the Further Alterations to the London Plan (in 2014), Steve Kelly, Assistant Director of Planning, himself noted that this was a 'stretching' target that it would not meet on its own without external GLA funding and support (https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf).</p> <p>b) The plan seeks to fulfill arbitrary targets imposed by the London Plan. The latest revisions to the plan increased the number of housing units to be built by 83% which can only be done by imposing unsuitably tall buildings in North Tottenham, along the Lee and at Broadwater Farm; demolishing structurally viable buildings, some less than 40 years old; destroying communities and destroying the</p>	<p>policies of the London Plan, including the strategic housing requirements allocated to each borough, forms the extant Plan for managing London's growth.</p> <p>Housing targets are not considered to be arbitrary, but statutory.</p>
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				<p>suburban character of neighbourhoods. The London Plan may well be revised when a new Mayor comes into office in May 2016. The need is to bring down these unrealistic targets for building in Haringey, especially in Tottenham, and redistribute building targets across the borough and the city. To meet the currently imposed targets means a form of building on many sites which if presented as an isolated planning application would be regarded by any reasonable precedent of the local planning committee as over-development.</p> <p>c) There are several alternative ways of making a larger number of homes available in the borough as we point out under paragraph 4 below.</p> <p>d) It is clear that a significant part of this new increasing housing target is going to be directed to particular parts of the Borough: the Eastern part - and more specifically Tottenham. The Alterations to the Core Strategy increase the number of homes to be delivered within the wider Upper Lee Valley Opportunity Area, which includes a growth point at Tottenham Hale, from 9,000 homes to 20,100. In the Site Allocation DPD and Tottenham AAP it is stated that half of the strategic housing target (=10,000 homes) imposed on Haringey by the latest Alterations of the London Plan should be located in Tottenham. This is not realistic and potentially highly damaging to the existing residents and businesses. Several wards of Tottenham already have the highest densities in the Borough (see table and map submitted with response). Bruce Grove, Saint Ann's Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate). White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land and valuable housing estates – which means that the</p>		<p>The overall spatial pattern of development is not being changed by the alterations in the Local Plan: Strategic Policies.</p>
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				<p>population density in the residential areas of those North Tottenham wards is high, too.</p> <p>This foreseen housing target is far too high for the existing infrastructure of Tottenham and will place a strain on social infrastructure, in particular health facilities (already seriously deficient, as shown by the recent Healthwatch Report on the deficit of doctors in SE Tottenham) as well as on schools and road capacity. How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in the Site Allocation DPD and Tottenham AAP (see our separate responses on these two documents for more precise evidence on the deficit of social infrastructure in Tottenham, in relation to health, open space and schools).</p> <p>This would also mean either unduly dense and very tall development, conflicting with the historic character of the area, with social sustainability and environmental objectives; or it would mean sacrificing valuable green space, needed employment land, and absolutely necessary social housing on existing estates.</p> <p>a) The assumptions in the <i>Housing Market Assessment</i> about growth rate of house prices and rents are far too low. Values applied to the viability calculations (i.e. how many 'affordable' units developers can reasonably be asked to build whilst leaving them an 'acceptable' profit) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that 'medium value' areas like Wood Green (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010 and now. But they have risen enormously! Average sales prices of residential</p>		<p>It is agreed and acknowledged in the Local Plan that infrastructure needs to grow to meet the needs of a growing population and to deliver sustainable development.</p> <p>The proposed new health facilities are predicated on the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan's housing trajectory.</p> <p>The Local Plan identifies a suitable range of sites to meet the housing need in the borough while safeguarding the borough's employment assets, heritage assets,</p>
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				<p>property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19th 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since as noted in Haringey’s Homelessness Strategy, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data shows Haringey lower quartile rents are £1,257 monthly and lower quartile GROSS earnings are 74% of lower quartile rents.⁷ This means that the conclusion of the <i>Housing Market Assessment</i> that most of the new housing will be ‘unaffordable’ for existing Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.</p> <p>b) There is also considerable ambiguity about what the affordability of ‘rent’ means in the context of the ‘affordable rent’ concept. ‘Affordability’ is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is ‘affordable’ may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.</p> <p>c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann’s</p>	<p>and open space.</p> <p>The setting of affordable rent levels is outside the scope of the Local Plan.</p> <p>The definition of affordable housing, including affordable rent, is that set out in the NPPF</p> <p>As set out in the Planning Obligations SPD, developments are subject to reappraisal on commencement, and phased stages and/or ‘claw back’</p>
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				<p>Hospital, in South Tottenham, the community group which formed the St Ann's Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for (i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.</p> <p>The chosen approach to housing provision and to 'housing estate renewal'</p> <p>a) There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities'. What does this mean? The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has also been demonstrated by research recently</p>		<p>arrangements, to ensure an uplift in values are taken into account in the level of obligations due, including affordable housing.</p> <p>In the example given, the money generated by the development is being used to fund strategic provision of healthcare facilities and services – and therefore helps to address Our Tottenham's concerns over adequate provision of social infrastructure.</p> <p>Private housing form part of Haringey's housing needs and is required to help pay for strategic infrastructure to support new and existing communities as well as to deliver affordable housing.</p>
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				<p>carried out by University College London (the Bartlett School of Planning).</p> <p>b) There is no evidence that the development of ‘mixed’ communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier response submitted in March 2015 (see text box in response) a mass of academic and policy research evidence to show that drawing in higher-income residents to ‘dilute’ council estate populations leads to disruption of community networks, class-segregated living and social tension, rather than greater cohesion. The history of many London estates where this ‘solution’ has been applied testifies to this, and there is extensive academic research which confirms it.</p> <p>c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by <i>Architects for Social Housing</i> citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety¹⁴ and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive. But no objective criterion or argument is given about what constitutes the ‘ideal’ tenure mix, or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-assessment/otherfactors-affecting-health/jsna-housing), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing in London, the central objective of the plan as stated in Housing Policy SP2 can only be achieved</p>		<p>More intensive development is required to meet housing needs.</p> <p>The right to buy makes it almost impossible for the</p>
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				<p>if a high proportion of social housing is maintained. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.</p> <p>d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.</p> <p>e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.</p> <p>f) The rise in private sector rents, induced by the expectation of a 'gentrification' of Tottenham and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting lists there, and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in Haringey so as not to disrupt children's education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be the housing association's responsibility. There will then be a displacement effect on social housing waiting lists elsewhere in London as the</p>	<p>level of social housing to be maintained.</p>
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				<p>housing associations struggle to find homes to re-house people whose homes they have sold for demolition. Is it the most appropriate strategy when considered against the alternatives?</p> <p>No. There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (https://architectsfor-social-housing.wordpress.com/page/2/) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources.</p> <p>According to a report from the Urban Lab and Engineering Exchange at University College London, ‘there is a growing body of research suggesting that extending the lifecycle of buildings by refurbishment is preferable to demolition in terms of improved environmental, social and economic impacts’ 15. See also the <i>Our Tottenham Housing Factsheet: Demolition vs Refurbishment</i> http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-vrefurbishment/.</p> <p>Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see https://www.sovereign.org.uk/about-us/strategic-asset-management/). We would expect to see a similar assessment of whether the Haringey Plan’s proposals for estates such as Northumberland Park or Broadwater Farm represent best value for public money, taking into account also the intangible <i>social</i> costs and benefits of each alternative such as keeping the community together and</p>		<p>The Council objected to the changes to government policy of converting office stock to residential without the need for planning consent. Disregarding for a second the principle that the Local Plan cannot control this change at present, it is considered that when applications of this type come forward, the Local Plan’s policies promote a positive response which will create improved employment and residential uses.</p> <p>There is a great deal of refurbishment of existing publically owned housing stock taking place across the borough.</p>
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				<p>continuity of children's schooling. For one specific group of estates, the 'Orlit' homes in Bounds Green, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment is technically feasible.</p> <p>Much greater attention is needed in the <i>Alterations</i> to the possibility of creating extra low-cost homes and reducing rent levels by:</p> <p>a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops owned by the Council.</p> <p>b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.</p> <p>c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last a year with a week's vacant period in between. This factor alone could 'provide' the equivalent of an extra 700 homes just by reducing the vacancy rate). It could be done through a nonprofit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.</p> <p>d) buying empty and hard-to-sell homes to let to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.</p>		<p>The Local Plan supports bringing the space above shops back into use.</p> <p>The Council has already established a not for profit lettings agency.</p> <p>The creation of longer tenancies and different tenancy types is outside the scope of the Plan, and is an issue that the Housing Strategy will address.</p>
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				<p>e) facilitating self-build and community non-profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has chosen to rely, is presented as 'the only show in town' and used as justification for failures to implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.</p> <p>f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.</p> <p>g) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.</p> <p>h) logistical help for older people who own much larger</p>	<p>The proposition that the Council will not accept alternative forms of housing provision is incorrect. The Council is starting the process of building its own homes, and will treat applications for self-build on their merits.</p> <p>Sites which can intensify assets such as car parks will be treated on their merits.</p> <p>The Council's policy supports suitable extensions to existing houses to create new units. It is important that these are in the right area, where the stock can support this change, and the facilities such as bins can be appropriately provided.</p> <p>Helping people in unsuitably large homes</p>
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				<p>homes than they need (3-5 bedrooms) to let rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.</p> <p>i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.</p> <p>j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting, and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.</p> <p>k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded via the private sector element of the development.</p> <p>If the intention is to have a genuinely ‘mixed community’ which meets the housing needs evidenced in many reports, the Local Plan should include these other options and ideas. Regrettably the phrase ‘mixed community’ appears to be used in the context of the Haringey Local Plan in the way critiqued by some academics ‘who question the evidence base for social mix policies and rhetorics that advance processes of gentrification’ (<i>Mixed Communities; Gentrification by Stealth?</i> Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).</p> <p>We have several concerns regarding the effectiveness of the proposed <i>Alterations</i>.</p> <p>a) The <i>Alterations</i> will result in expulsion of many residents who will be ‘priced out’ of Haringey into neighbouring areas</p>	<p>to “free up” this accommodation is sensible, but not a planning matter.</p> <p>The Council refurbishes much of its housing stock, but the decisions taken on this are outside the scope of the Local Plan.</p> <p>The principle of private development cross subsidising new public housing is supported.</p> <p>The Local Plan seeks to build new homes to meet housing need in the borough. It does not have policies which seek to price local residents out of the borough.</p>
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				<p>or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.</p> <p>b) There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building.</p> <p>Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided.</p> <p>There are fine aspirations about traffic and the infrastructure (para 3.1.19 of the <i>Alterations</i>) but much of this does not relate to real experience. Para 3.1.19 states that 'the £37m Tottenham Hale transport scheme has sought to reduce the impact of traffic on the local area, and increase capacity to cope with future demand. This will enable the regeneration of the area as set out in the Area Action Plan...' The Tottenham</p>		<p>The Infrastructure Delivery Plan sets out how critical infrastructure will grow to meet the needs of Haringey's growing population.</p> <p>Policy DM51 manages how early years provision can be provided, with an emphasis on protecting family housing stock, and ensuring that new facilities are of a good standard.</p>
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				<p>Hale gyratory works are complete, yet the traffic is as gridlocked as ever, and access routes, such as Ferry Lane are extremely congested. How will an additional 5,000 homes, (possibly an additional 10,000 people) be accommodated?</p> <p>c) According to Cabinet papers revealed to the public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on a variety of actors and development partners in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community partners such as coops, community land trusts or social enterprises.</p> <p>Is it deliverable?</p> <p>Many of the <i>Alterations</i> are potentially not deliverable.</p> <p>a) The plan involves serious over-development of many sites as already stated in point 2(d) above.</p> <p>b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.</p> <p>c) The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being 'beaten down' in negotiations on the proportion of 'affordable' units and on infrastructure contributions, as with the Spurs development.</p>		<p>While the Council is beginning to create its own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>It is considered that the plan meets objectively identified housing and employment needs across the borough. The densities shown as required to deliver the Plan are well within the</p>
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				<p>d) The <i>Alterations</i> reinforce the fact that is a one-dimensional plan which relies on private developers and a buoyant housing market to achieve its objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?</p> <p>e) Part of developing alternative approaches would be to examine eventualities which might occur – in other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined zones.</p> <p>f) Haringey’s proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.</p> <p>Is it flexible? The <i>Alterations</i> make the plan inflexible since it is one-dimensional as described above in paragraph d.</p> <p>a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.</p> <p>b) There is nothing in the plan to say what will happen is the</p>	<p>GLA’s density matrix.</p> <p>The pattern of development that has been set out in the Local Plan has been subject to the statutorily required sequential test, and all sites have been included in a borough-wide SFRA. Additionally, upon development, all sites will be required to not increase the risk of flooding on the site, or elsewhere.</p> <p>The establishment of a joint venture housing delivery process is outside the scope of the Plan. Any such process will implement the policies included in the Plan.</p> <p>All viable options for estate renewal will be considered on a site by site basis, having regard to the quality of the existing buildings.</p>
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				<p>envisaged strategy (overall or for specific sites) cannot be achieved. We know from the Council’s latest proposal for a Joint Venture Company approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the market affects one particular private sector partner, the one which will be chosen as 50% owner of the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.</p> <p>c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late ‘noughties’ caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.</p> <p>d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp decline in market values and ‘lettability’ in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in Northumberland Park.</p>	<p>The strategic outcomes sought by the plan are subject to annual monitoring. Where an objective or target is not being met, the actions as set out in the monitoring schedule will be followed, and may include further alterations to the Plan.</p> <p>The level of housing to be delivered and the pace of delivery means large private developers are necessary but the plan encourages housing by small developers and self build to help supply.</p> <p>A requirement of the Local Plan is to demonstrate that the Borough’s strategic needs can be met and</p>
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				<p>Homes being left empty could lead to dereliction and social problems (such as a ‘sink estate’ reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.</p> <p>e) Our over-riding concern is that refurbishment should always be considered as an option alternative to demolition. Will it be able to be monitored? We have concerns that the <i>Alterations</i> cannot all be properly monitored.</p> <p>a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the <i>Alterations</i> says nothing about how much ‘affordable’ housing will be built on each main site. This is also the case in the Site Allocation DPD and in the Tottenham AAP. We would expect that at the least, targets for ‘affordable’ units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area. We also note that it is not clear whether the ‘affordable’ percentage target of 40% is calculated as ‘new build affordable/total new build’ or ‘new build affordable/(total new build minus the number of social rent properties demolished or amalgamated into larger units)’.</p> <p>b) The ‘housing trajectory’ graph (Appendix 1, p. 58 of the <i>Alterations</i>) which states how many units will be built in each year does not say how many will be affordable at each stage. This means that the ‘affordable housing’ proportion of the total cannot be monitored against the target year by year.</p> <p>4. Is the plan consistent with national policy? As stated above, the <i>Alterations</i> fail to demonstrate how they will meet a whole range of London Plan, national and local</p>	<p>delivered. This necessarily means allocating site for redevelopment.</p> <p>All viable options will continue to be considered on a site by site basis for estate renewal.</p> <p>The Plan specifies the number of affordable homes to be delivered over the plan period. On individual sites, optimum provision is based on a number of factors and requires site by site negotiation (See Policy DM13).</p> <p>The Plan is considered to be consistent with the NPPF and the latest</p>
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				<p>targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).</p> <p>The <i>Alterations</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the borough, in Tottenham in particular. The Planning Inspector for the Plan’s predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey’s character is generally suburban.</p> <p>Equalities legislation:</p> <p>The effect of the <i>Alterations</i> would be an unacceptable attempt to enforce a ‘top-down’ social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey’s character. National policy (the Equalities Act) would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact that the plan will ‘dilute’ and drive out the existing residents of Tottenham means that negative impacts will disproportionately affect ethnic minority people. Appendix C to the <i>Consultation on Haringey’s Draft Housing Strategy 2015-2020</i> also demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states: ‘Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east. Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White</p>	<p>version of the London Plan.</p> <p>The Council does not agree that the local plan’s housing plan will disadvantage BME residents. The respondent refers to the EQiA that was carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years, whilst social housing lets over the last two years were</p>
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				<p>buyers are overrepresented in comparison with their representation in the general population of Haringey...</p> <p>The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.'</p> <p>We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory, given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year. Such incomes clearly make so-called Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is the GLA's affordability criteria, see page 53 of <i>Appendix C</i>).</p> <p>We believe that the policy of demolishing council estates therefore breaches the commitment in Haringey Council's Equal Opportunities Policy of April 2012 to the fair provision of services. Paragraph 3.2.2 of Haringey's Local Plan: Strategic Policies 2013-2026 states that: 'The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live.' In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan. It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.</p>	<p>around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has been the subject of extensive consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to its own EQiA as part of the</p>
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					<p>We would also note council plans to house more homeless families outside London (see Haringey Council's <i>Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18</i>). (This was a report made to the Cabinet as part of agenda papers on 16/12/2014). Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing numbers of Haringey's homeless families being forced out of London. This 'social cleansing' aspect, adds to the discriminatory nature of the proposal to demolish social housing. As Appendix C of the <i>Consultation on Haringey' Draft Housing Strategy 2015-2020</i> states 'Black households approach as homeless at a level which is more than twice their representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.' Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory nature of the Council's plan for Northumberland Park and Tottenham as a whole.</p>		<p>Sustainability Appraisal.</p> <p>No change</p>
20	RSP 52	Alt4 9, 61,6 2,63	Not stated	Not stated	We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%.	It should be increased to the maximum possible.	<p>Evidence suggests that 40% affordable housing is the maximum amount possible.</p> <p>No change</p>
20	RSP 53	50 and 59	Not stated	Not stated	We disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, it is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price	We therefore demand that a separate	This response relates to rent levels for affordable rented housing, which is an issue outside the scope of the Local Plan.

					range of low income families in Haringey. A truly affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low-income Haringey residents is social rented . 'Affordable' should not be defined as 80% of a market rent , which is unaffordable to the vast majority of Tottenham residents.	and clear percentage for social rented housing be set in the affordable housing provision target; 70% of that affordable housing target should be social rented housing.	Given the levels of subsidy available for "social rented" housing at the current time, it is not considered to be deliverable to seek this type of housing. The tenure split seeks to maximise the provision of affordable housing. No change
20	RSP 54	53 and 64	Not stated	Not stated	We strongly disagree with the approach embedded in the rewording of Alt53 and Alt64 about housing estate 'renewal and improvement' , for reasons explained at length in the previous section. See also the detailed response and comments we made in relation to housing estate renewal in the Tottenham AAP (in particular in relation to Northumberland Park) and in the Site Allocation DPD. We support Haringey Council's objective as laid out in para. 3.2.2, Policy SP2 HOUSING that 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of' . This key priority can only start to be met by embedding the following principles CLEARLY in the policies on housing estate renewal in the <i>Alterations</i> (Alt53 and Alt64):	No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement	The Local Plan protects affordable housing on a floorspace basis on estate renewal, which is considered the most appropriate method in ensuring housing need is met in full. Regarding consultation, and how developments take place, this will be controlled not by the Local Plan but by the Council's housing

						<p>nt and empowerment of the existing residents as the drivers of all the decision-making related to their homes.</p> <p>Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, communit</p>	<p>investment strategy and the requirements of the Housing Act, including s105.</p> <p>It is important to note that while structurally sound homes should be reconditioned/ redeveloped, it may be appropriate in some instances that structurally sound homes are replaced with a greater number of homes which better meet the borough's housing need.</p> <p>No change</p>
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						<p>y facilities), for the benefit of the current occupants</p> <p>There should be absolutely NO NET LOSS of social housing units and no displacement of existing tenants as part of any plan for an estate. The proposed wording 'reprovide the same amount of social housing on an equivalent floorspace</p>	
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						<p>basis' does not guarantee those principles, and should be rephrased. There should be no demolition of structurally sound homes.</p>	
20	RSP 55	SP8 Alt70	Not stated	Not stated	<p>In March 2015, in our response (no. 818) to the public consultation on the <i>Alterations to Strategic Policies 2011-2016 (version February 2015)</i>, we made detailed comments with regard to the sections and policies which concerned employment land. We challenged the evidence base upon which changes to these were made. We wish to reiterate these comments here and argue that the alterations proposed under policy SP8 are not sound because they are not positively prepared or justified. The alterations are based on the <i>Haringey Employment Land Study</i> update which was released to the public in February 2015 (available here: http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_employment_land_study_-_final_feb_2015_0.pdf). We have identified a range of serious concerns about the <i>Haringey Employment Land Study</i> update which we believe need to be addressed before any Alterations to the Strategic Policies are made, and which seriously challenge its reliability as a source of evidence informing the present <i>Alterations</i>:</p> <ul style="list-style-type: none"> o The study displays a lack of understanding of the 	<p>Not specifically stated</p>	<p>The Employment Land Review is a robust evidence base, prepared in accordance with national guidance and best practice.</p>

				<p>characteristics and strengths of the existing economy, in particular the activities underway within industrial land and high streets. Work from CASS Cities from Mark Brearley, Jane Clossick and their students is insightful here (see their separate submissions in the March 2015 public consultation), as well as the survey of industrial estates (<i>From Around Here</i>) undertaken by Gort Scott architects and funded by Haringey Council and the GLA, here http://www.gortscott.com/media/uploads/639-final-3.pdf.</p> <ul style="list-style-type: none"> o A detailed survey of existing businesses (quantitative and qualitative) should be undertaken (see those undertaken by the LLDC in support of their local plan). Existing businesses, business groups and community groups have not been consulted or included within the stakeholder consultation conducted to inform this study. This makes it invalid and it should be repeated with a wider involvement of relevant local actors rather than just commercial developers and real estate actors, whose measure of success tends to be increases in rent rather than the broader concerns of Haringey Council and local communities. <p>For example, the section on ‘vacant floorspace’ starting on page 34 implies that new workspaces are inherently more attractive than existing (‘second hand’) premises. This is not the case and is indicative of the dominance of a developer/investor rather than business/tenant perspective within the employment land study.</p> <ul style="list-style-type: none"> o Maps should be included. o The study acknowledges that the market for offices in Haringey is weak (as it does not compete with the central London market) while the market for industrial space is generally strong, with particular demand for space for flexible premises for SMEs. Yet the study seems to project a replacement of the strong industrial market with the weak office market, by losing industrial floorspace to higher density office and mixed use developments. This seems very 		<p>A map is included at the rear of the ELR</p> <p>Haringey needs to make more intensive use of its existing employment land for future employment provision. While there may be</p>
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				<p>contrary to the evidence presented and potentially very damaging to Tottenham’s economy.</p> <p>o The study acknowledges strong demand for industrial floorspace, and good occupancy rates on all estates, and yet still ends up recommending the relaxation of the status of some industrial areas to ‘Regeneration Areas’ to facilitate the delivery of the Council’s housing and regeneration aims. The study is not considering how a failure to protect this workspace will impact on the Council’s economic development aims. For instance, there is a lack of awareness about the role of existing workspaces in facilitating a growth in SMEs, green industries and social enterprises, despite these being stated aims of the Council’s 2020 economic development and carbon reduction strategies. The study conveys no sense of the vision for the local economy. The study acknowledges that new commercial floorspace development often results in a net loss of employment floorspace due to the removal of existing floorspace (para 8.10 and paras 5.136-5.138). This finding does not seem to be dealt with at all in the plans policies. The loss of well functioning and valued employment land to make way for contentious major developments that displace existing residents and businesses (e.g. High Road West, Spurs Stadium, Wards Corner) is a major concern and has not been considered at all within the various planning documents. Business displacement should be studied in detail as part of a new economic evidence base for the plan. It is particularly important to address this issue within the Tottenham AAPs.</p> <p>o There is no consideration of:</p> <p>The impact of the relaxation of permitted development rights on the supply of employment space (the study explicitly says this has not been taken into account). As this change is likely to remove a lot of employment land from Haringey, not considering this makes the plan unsound.</p> <p>The impact of the loss of industrial land across London</p>		<p>demand for additional B8 uses, additional B8 use in a Haringey context is considered to be an inefficient use of land. Nevertheless, Haringey does not have land to accommodate new B8 provision. Office demand in the borough is growing as a result of the office to residential permitted development driving firms out from more central London locations. While currently not a recognised office provider, Haringey has all the pre-conditions to grow a strong office market, especially its connectivity to the rest of London and beyond.</p> <p>The permitted development right has not affected Haringey as much as other more central London Boroughs, mainly because Haringey has such a small supply compared with other boroughs and the demand is relatively</p>
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				<p>making the employment land sites in Haringey and particularly Tottenham more attractive. The Tottenham Opportunity Investment Fund is based precisely on this understanding. The plan needs to take this into account also to be sound.</p> <p>How different land uses relate to and rely upon each other. E.g. office / industrial /retail in and around high streets and town centres. There is no consideration of the links between retail and industrial land – the studies are entirely separate.</p> <p>Without prejudice to our broader concerns, we are also concerned that some of the recommendations of the updated <i>Haringey Employment Land Study</i> have not been carried through into policy. New policies should be added to carry through the following recommendations:</p> <ul style="list-style-type: none"> o Para 7.19 says that ‘Any release of surplus employment land should not be to the detriment of successful B2 and B8 businesses... any B2/B8 businesses that are affected by the loss of employment land should be relocated to suitable premises so that viable industrial and warehousing businesses are not adversely affected’ (p.48). This is also explicitly specifically mentioned in relation to High Road West at para 5.57 yet no mention of this commitment is included in the Tottenham AAPs. A policy should be added to set this out, and to commit to properly compensating firms. However, due to pressure on industrial land, it will be hard to find suitable alternative sites within London. o The <i>Haringey Employment Land Study</i> update recommends that guidance is provided on how B-class floorspace should be provided within mixed use schemes. This guidance does not exist elsewhere and should be provided. This is an untested approach and requires guidance. 	<p>stable and comparable to residential in parts of the borough such as Tottenham Hale.</p> <p>It is the role of the Strategic Policies DPD to bring the findings of these different studies together and ensure they result in synergies or potential conflicts are managed.</p> <p>Successful industrial land sites are protected for industrial use in the Plan.</p> <p>The relocation of businesses is desirable but is ultimately a commercial decision of the landowner and/or operator.</p> <p>Work has been undertaken on Workspace Viability to determine the type of new floorspace to be provided. This is taken forward in the Development</p>
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							Management Policies DPD
							No change
20	RSP 56	Alt7 1	Not State d	Not Stated	We strongly disagree with proposed amendment Alt71 which decreases the forecast demand of new industrial workspace (B use classes) from 137,000 sqm to 23,000 sqm (which is even lower than the 32,000 sqm mentioned in the February 2015 version of the <i>Alterations</i>). While the amendment has come from the update of the <i>Haringey Employment Land Study</i> (para. 7.11), we have identified a range of serious concerns about that study (see above). It seems entirely counterproductive to reduce ambition for new employment floorspace at a time when Tottenham's population and economy is projected to grow so rapidly . This proposed amendment should be withdrawn pending a new full review of Tottenham's industrial land .	Not specificall y stated	This is based on the findings of the Employment Land Review and is therefore supported by robust evidence. No change
20	RSP 57	Alt7 2	Not state d	Not stated	We strongly disagree with proposed amendment Alt72, which foresees the proposed downgrading of the employment land status of Crusader Industrial Estate N15; High Road West N17; part of Vale Road/Tewksbury Road N15. The <i>Haringey Employment Land Study</i> describes these sites as well occupied and well performing in its description of individual industrial sites from p. 23 onwards: - Crusader Industrial Estate is the site of Haringey Council's investment in fashion and textiles; both sectors requiring industrial workspace. [Elsewhere, it is mentioned that 'some industrial estates are at risk of being converted to alternative uses. This is evidenced with Crusader Industrial Premises not providing leases of more than 5 years, which indicates that the landowner may have other intentions for the site's future use' (p.18). Retaining this site as employment space will therefore require strong planning policy protection to prevent owners driving out existing uses and preventing investment through the use of short term leases.]	Not specificall y stated	The change to the categorisation of the employment land sites mentioned is based on the findings of the Employment Land Review and is therefore supported by robust evidence. No change

					<p>- High Road West is described as ‘well occupied and is therefore serving the needs of local businesses’ (p. 27).</p> <p>- Vale Road/Tewksbury Road is the site of unplanned warehouse conversion as well as ‘significant swathes of the site are still in active employment use however and should be protected for ongoing employment use’ (p.30).</p> <p>If the protections of these sites are removed, it is likely that their functions will be damaged through housing and mixed use development. There is a strong need for industrial land in London, and these well performing areas should continue to be protected as required by the London Plan. The Council risks its aspirations for regeneration damaging the strengths of its existing local economy – these strengths are acknowledged in regeneration and economic development strategies but not in its planning policies. All of the strengths mentioned in the Opportunity Investment Fund for Tottenham Factsheet (http://www.haringey.gov.uk/sites/haringeygovuk/files/hc_25783_opportunity_investment_fund_v3_web.pdf), for instance, require industrial workspace which the Strategic Policies do not sufficiently protect: ‘artisan bakers, craft breweries, gourmet popcorn manufacturers, royal uniform makers and high end furniture makers’ (Tottenham Opportunity Investment Fund factsheet).</p>		
20	RSP 58	Alt7 7	Not stated	Not stated	<p>Alt77: the proposed amendment to para. 5.1.18 introduces updated jobs targets for Haringey, introduced by the Further Alterations to the London Plan, which forecast 22,000 new jobs between 2011 and 2036, which would give the highest employment growth rate of all London boroughs. Steve Kelly from Haringey Council himself said these growth rates could not be delivered in its response to the consultation on the FALP (https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf). The <i>Haringey Employment Land Study</i> says that this scenario ‘would result in levels of B use class</p>	Not specifically stated	The jobs target is ambitious but all efforts should be made to achieve this target to ensure sustainable communities are delivered through the Plan that includes both an increase in housing as well as employment provision.

					employment growth that Haringey has not witnessed in the past two decades and would result in significant additional employment land requirements that would be difficult to provide for given the limited availability of sites and the Borough' housing and regeneration policies' (p. 49). The Study recommends that Haringey therefore does not plan on the basis of the FALP employment projections, but the much lower trend-based projections. This quote also confirms the view that Haringey's – and Tottenham's specifically – supply of industrial land is being sacrificed to deliver its housing and regeneration priorities. This will have severe impacts on the nature and character of Tottenham for years to come, weakening the prospects for sustainable and inclusive development that actually benefits local people and local businesses.		No change
20	RSP 59	Alt7 8	Not stated	Not stated	Proposed amendment Alt 78 (para. 5.1.23) makes reference to a stakeholder consultation done as part of the <i>Haringey Employment Land Study</i> . The study should list who was included in this consultation. We do not believe existing businesses were part of this consultation. Policies in support of workspace for SMEs should not just engage real estate and commercial developers in considering how to deliver new affordable workspace but also engage existing businesses and business groups about what their needs are and how existing low cost workspaces can be retained and supported. Alt 78 should confirm how existing businesses and businesses have been consulted and what the council's policies are in relation to existing low cost workspace.	Not specifically stated	The Employment Land review clearly states that the consultation was undertaken with local agents who have a detailed knowledge of the local employment market and local conditions. Local businesses have been engaged in the Plan-making process through either their requested to be included on the LDF database, through representation by trade bodies, or by direct notification if directly affected by a site

							allocation.
							No change

Respondent 21: Magnus Dahlstrand

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RSP60	NA	No	Yes	The document "non-technical summary of the four sustainability appraisals" mentions the Haringey Warehouse District and issues with it, but the main document "Alterations to Strategic Policies Regulation 19" fails to address actual possible changes in this area, and how it will affect current work/live residents. The document seems to miss out on a clear definition (and therefore the root of my worry; understanding) of the area's currently versatile and multi-faceted use, where a majority of people work (either "remotely" from the area, or elsewhere in London) a "normal" job to fund various projects they invest their spare time in. These are the people and the projects which make the area "creative" (as phrased in the document in question) and with a long-term enabling plan these projects could help grow Haringey into a sustainable and growing economy.	Please provide clearer wording around the definition of the population and use of the "Haringey Warehouse District".	It is considered that the policies in the DMDPD (specifically the Warehouse Living policy) and Site Allocations do a considerable amount to build upon the unique characteristics of the Warehouse District. The term 'Live/Work' is not applicable to the communal living and working arrangements taking place within these estates. The purpose of including a detailed Development Management Policy on Warehouse Living is to try and retain the current arrangement but ensuring this takes place in buildings that are fit for habitation. No change

					I'm all for making the area's properties safe to live in, and I appreciate the concern with which it has been ensured in the last couple of years, and all I want is to ensure future decisions are well-informed with this live/work community in mind - a community which would love to help shape the communal spaces to be more inclusive and green. Living in South Tottenham I understand the need to ensure the future and safety of our communities, and new developments like the ones newly erected along the reservoirs do not contribute to this, providing living opportunities only for those who can afford to buy £450,000+ properties.		
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Respondent 22: Environment Agency

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RSP61	Paragraph 3.1.15	Yes	Yes	We are pleased to note that the strategic policies document states that the Tottenham Hale Growth Area has undergone the Sequential Test. This is key to ensuring development is not located in an area of flood risk when other viable alternatives are available. We are also encouraged that the deculverting of the Moselle Brook is included as an aspiration for the Tottenham Hale regeneration scheme. This is key as culverted watercourses dramatically increase flood risk due to the possibility of	Not stated	Noted.

					blockages restricting flood flows. In addition to this, culverts present major disruption to the riparian corridor, with loss of potentially productive riverside habitat.		
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Respondent 23: Campaign to Protect Rural England London

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
23	RSP62	Alt6, Table 1	Not stated	Not Stated	Alteration 6, in Table 1, appears to remove "continued support for the protection of the green belt, metropolitan open and other green and open spaces". This still remains a key commitment of the Mayor's London Plan and should therefore be retained.	-Doc should retain reference to "continued support for the protection of the green belt, metropolitan open and other green and open spaces".	It quotes the London Plan, and as such doesn't need to repeat the contents of this Plan. Policy SP13 sets out that Green Belt MOL and open space will be protected from inappropriate development. No change

Respondent 24: London Borough of Hackney

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
24	RSP63	Alt28 & Alt49	Not stated	Not Stated	The Council notes that the Haringey Strategic Policies DPD has identified a borough housing supply figure of approximately 22,000 additional homes, which is significantly above the Objectively Assessed Need figure of 13,450 additional homes. It is also noted that the Haringey's affordable housing targets would be reduced from 50% to 40% and the tenure split would be changed from a 70/30 social rent/intermediate to 60/40. The Council considers these to be cross boundary strategic issues and would welcome further discussion with Haringey on these	Not specifically stated	Noted. The Council has identified a suite of sites which meet both our identified housing need in terms of that identified in the SHMA, and the London Plan housing target. No change

					matters particularly in the context of Hackney's Local Plan review which has recently commenced.		
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Respondent 25: Greater London Authority

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RSP64	Alt42 SP2	Not Stated	Not Stated	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	Not Stated	Noted. Regard has been has to London Plan Policy 3.3, with regard to additional capacity, which has resulted in the identification of capacity for 22,000 homes – more than 2,200 above the minimum housing supply target and excluding windfall supply. No change

					housing contribution that can be made in 'Areas of Limited Change'.		
25	RSP65	Housing Standards	Not stated	Not Stated	<p><u>Housing standards</u> 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.</p>	References to space standards should refer to those set out in the Mayor's emerging Minor Alterations to the London Plan (MALP)	<p>Noted. The text refers to the space standards set out in the London Plan – therefore, once the MALP is adopted, the Haringey Local Plan Policy SP2 will continue to be relevant and in conformity.</p> <p>SP2 (5) is also considered consistent with MALP standards for access M4(2) and wheelchair user dwellings M4(3) – although it is recognised that the terminology has changed and this part of the policy could be updated at a later stage to reflect this.</p> <p>No change</p>
25	RSP66	Employment Designations	Not Stated	Not Stated	<p>Employment designations</p> <p>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.</p> <p>Also as previously suggested, the</p>	Not specifically stated	<p>Noted. The only Designated Employment Land to be de-designated is DEA8 N17 Studios 784-788 High Road, in accordance with the Employment Land Review. This is the site of the new Spurs Stadium and therefore the retention of the employment land designation is inconsistent with the recent grant of planning permission for the site.</p>

					<p>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.</p>		<p>In total, the removal of this site from the designated supply results in a loss of 2.1ha from a total of 131.4ha (i.e. 1.6%). This is therefore well within the indicative industrial land release benchmark for Haringey of 24ha between 2011- 2031 within the Mayor's Land for Industry and Transport Supplementary Planning Guidance (SPG). The change of designations from SIL, LSIS or EA to Local Employment Area – Regeneration Area, does not imply a removal of the employment land designation but rather alignment with wider regeneration potential within growth areas such as Tottenham, and Wood Green, or in response to existing circumstances in South Haringey & Green Lanes (Warehouse Living).</p> <p>No change</p>
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Respondent 26: Transport for London

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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26	RSP67	3.1.33	Not Stated	Not Stated	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.	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.	It is considered that this is addressed through Policy NT5 of the Tottenham Area Action Plan. No change
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Respondent 27: Historic England

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
27	RSP68	General	Not stated	Not stated	On a general point is it essential that there is consistency in the treatment of local charter and historic context when considering the delivery of growth in defined areas. The three areas identified of Area of Change, Growth Areas and other areas (i.e. Areas of Limited Change) have different approaches in how they consider the integration and consideration of existing contextual qualities of a place. This includes respecting the historic context. The reference below helps illustrate this point further.	Not specifically stated	Noted.
27	RSP69	Alt30 3.1 Policy SP1: Managing Growth	Not stated	Not stated	We note that the Council will expect development in the Growth Areas to maximise site opportunities, for areas such as North Tottenham and Tottenham Hale. Our concern is that the use of 'maximise' in this context could be contrary to the delivery of balanced sustainable developments in line with national policy	The wording should be amended so that it focuses on <i>optimising</i> site potential rather than maximise	The term 'maximum' in the context of strategic provision, accords with the London Plan, specifically policy 3.3. On individual sites, the Council requires sites to optimise site

					(NPPF) e.g. consideration of environmental characteristics such as the heritage interests that should influence the development of sites. As an alternative, and to reflect both the NPPF and London Plan, the wording should be amended so that it focuses on <i>optimising</i> site potential rather than maximise. This approach would reflect the wording used in the later part of the policy when an explicit reference is made to change respecting the character s its surroundings.		potential based on a rigorous design led approach (See Policies DM1 & DM11 of the Development Management Policies DPD). No change
27	RSP70	Alt53 and Alt64	Not stated	Not stated	It is noted that the Council are bring forward a programme to improve and renew its own housing estates, in order to improving their quality and numbers of homes. Priority is given to estates that are within wider regeneration proposals (Policy SP2 Housing, and paragraph 3.2.29). We would seek assurances that as part of the process of designing and implementing change, that the potential heritage interest of each estate is fully identified, understood, and used (where recognised) in line with the principles of sustainable development. As an aid to ensuring the process of renewal is delivered effectively we would encourage the Council to work collaboratively with Historic England in identifying any potential heritage interest.	Not specifically stated	Agreed. A further paragraph could be added to Alt64 (after the second paragraph) which clarifies that the consideration of potential redevelopment options for individual renewal estates should have regard to the potential heritage interest of the estate (Historic England can assist with identify this) and to existing social and community facilities that support the existing community.

Appendix J – Individual Comments received to the Pre-Submission Schedule of Alterations to the Strategic Policies DPD Consultation – Document Order

Alterations to the whole document (Alt 1-2)

No comments received

Sections 1.1-1.6, Introduction (Alt 3-27)

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RSP1	1.2.16 Alt 6	Not stated	Not stated	Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing need for more homes in London. This will ensure the effectiveness of the plan meaning that it can be properly monitored against strategic targets. Please refer to the accompanying cover letter (part (c) bullet 1).	Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing need for more homes in London. This will ensure the effectiveness of the plan meaning that it can be properly monitored against strategic targets. Please refer to the accompanying cover letter (part (c)).	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802 homes. The Council does not consider that the suggested change to the introductory text adds any clarity to the Plan. No change
1	RSP8	Alt 6	Not stated	Not stated	Alteration 6, Section 1.2, paragraph 1.2.16 should make clear that the housing targets set out in the London Plan are minimum targets, reflecting the pressing	As per response form	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802

					need for more homes in London		homes. The Council does not consider that the suggested change to the introductory text adds any clarity to the Plan. No change
2	RSP14	Alt6	Yes	Yes	<p>We recognise that the release of 2011 Census data, which set out higher than previously projected population growth figures for London, has resulted in the Mayor of London adopting Further Alterations to the London Plan (FALP).</p> <p>This has significantly increased Haringey's strategic housing target from 820 homes per annum to 1,502 homes per annum, effective from April 2015 – an 83% increase. This increase requires a review of housing delivery in the borough, and a clear need to maximise development opportunities in appropriate locations.</p>	None stated	Noted.

23	RSP62	Alt6, Table 1	Not stated	Not Stated	Alteration 6, in Table 1, appears to remove “continued support for the protection of the green belt, metropolitan open and other green and open spaces”. This still remains a key commitment of the Mayor’s London Plan and should therefore be retained.	-Doc should retain reference to “continued support for the protection of the green belt, metropolitan open and other green and open spaces”.	It quotes the London Plan, and as such doesn’t need to repeat the contents of this Plan. Policy SP13 sets out that Green Belt MOL and open space will be protected from inappropriate development. No change
9	RSP31	Alt7 & Alt 25 Paras 1.3.1 1.4.10	No	Not stated	I believe that the plan is unsound on grounds of :- 1) it is not the most appropriate strategy when considered against the alternatives 2) therefore it is not effective I have issues about:- a) the low amount of affordable housing, the target should be re-set at least 50% b) the excessive reliance on a small number of powerful large private developers to get housing built,	a) <u>The low amount of affordable housing</u> Under SP2, the target should be re-set at least 50%, given that the strategic housing market assessment says that 58% of the local population cannot afford a rent as high as 80% of market levels and given the plan’s own admission in para 1.3.1 that 59% of total net additional homes need to be ‘affordable’. Otherwise a lot of current residents will have to move further away from central London, with consequent difficulties for their employment and a higher demand on transport facilities as their jobs will not necessarily move with them. b) <u>The excessive reliance on a small number of powerful large</u>	The maximum amount viable across the borough is 40% as demonstrated through the Viability Study which informs the Plan. It is not considered that the Local Plan discriminates against small developers, housing co-ops, refurbishment or infill developments. All of these methods will contribute to providing the affordable housing that the borough needs and specific policies encouraging these forms of development are provided for in the Development

					<p>c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes</p> <p>d) the absence of attention to energy saving and local power generation</p>	<p><u>private developers to get housing built</u></p> <p>The plan needs to be considered alongside the Council's adopted policy of working with Spurs as a major player, and its adopted proposal to set up a single joint venture company with 50% developer equity (and control) to which many sites in Wood Green and Northumberland Park will be transferred. This gives enormous bargaining power to these two private interests. Spurs have already negotiated away much of their s.106 contribution to the redevelopment of the football ground area and have been given planning permission for two huge towers with no 'affordable' housing. There are huge risks attached to dependence on the market destiny of a handful of companies.</p> <p>The Council should be seeking to sub-divide sites to facilitate development proposals from smaller builders and from community led organisations (such as housing coops, community land trusts, or development trusts). It has 15 years to facilitate the development of the latter category,</p>	<p>Management Policies DPD (see Policies DM14 & DM16).</p> <p>While the Council is beginning to create its own development capacity, it is recognised that this will not be sufficient to meet the needs identified. It is therefore essential that the Council works with the private sector to ensure that the new homes and jobs that meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>Requiring sites to be sold in a certain way, or to be built a certain time after permission, is not within the scope of the Local Plan. The Planning Obligations</p>
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					<p>of which at least 3 already exist in Haringey.</p> <p>I am agnostic as to where would be the best place in the 'strategic policies' document to say this, but something is needed along the lines of:-</p> <p>' The Council will seek to diversify its array of development partners by encouraging community led development organisations such as housing coops and non-profit trusts to come forward, request sites and discuss proposals, and where appropriate will help them with formulation of proposals and searches for sources of finance pre-planning-application. It will also encourage smaller London-based building companies to put forward proposals for just part of a site defined in the Site Allocation Documents where this is likely to produce value for money and speedy use of the available land.</p> <p>The Council will not tolerate land being left undeveloped for more than xx months (xx = 10?) following the grant of planning permission. Once a s.106 contribution has been agreed, planning permission may be</p>	<p>SPD does provide a clawback mechanism that enables sites which have taken a number of years to be delivered to be reassessed for affordable housing proportions when the sales values become known.</p> <p>Refurbishment is being carried out on a range of housing sites across the borough.</p> <p>The turnover of private rented properties is outside the scope of the Plan.</p> <p>The bringing forward of space above shops is already supported through the Plan</p> <p>The Government has already relaxed Permitted Development rights for rear extensions. The Council wishes to ensure through its planning policies that these do not negatively impact</p>
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						<p>revoked if this agreement is not adhered to and appropriate funds must be placed in an escrow account before building regulations approval can be finalised.</p> <p>The Council may require as a condition of planning permission that units should not be offered for sale 'off plan' except to RSLs or organisations offering to 'sell on' for shared ownership'.</p> <p>This last provision is to avoid off-plan sales which favour cash buyers, often foreign companies, at the expense of local owner occupiers. It would mean facilitating a 'bridging loan' arrangement by shared ownership providers so that someone who cannot get a mortgage until the building is completed can obtain a shared ownership deal to start off with and then buy out the rented share as soon as s/he can obtain a mortgage, maybe within months.</p> <p>Following the example of Islington Council, steps need to be taken against the 'buy to leave' practice. Therefore somewhere the policies should say something like:-</p>	<p>upon neighbours' amenity.</p> <p>There are policies governing the creation of new decentralised energy networks in the DMDPD.</p> <p>No change</p>
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						<p>'New homes should be occupied by a resident within 3 months of completion, otherwise the Council reserves the right, as a condition of planning permission, to nominate a suitable occupant or to require letting to a registered social landlord. Evidence of genuine residential occupancy, such as the name and workplace of the occupant, and records of use of electricity and water, may be required in cases of doubt.'</p> <p>Also in question should be use of new homes for 'air b and b' type lettings. Where permission is granted for a residential development, it should be considered a breach of that permission if hotel-type use, with more than say 8 different occupants in a year in the same dwelling, is subsequently discovered.</p> <p>c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes</p> <p>The plan is focussed on meeting the new homes target by building on large sites, often to excessive height especially around</p>	
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						<p>Tottenham Hale. Spontaneous action to expand the existing housing stock upwards or sideways is neglected unless it is envisaged in a brief mention of 'windfall sites' in para. 3.2. But expanding and making better use of existing buildings has considerable potential, for example by:-</p> <p>1) reducing the void rate of the housing stock. In particular this could be done by reducing turnover of private tenants. Typically private landlords are now letting for as little as 6 months at a time. When they do so the property may well be left empty for a week between lettings, so that extending the length of tenancy from 6 to 12 months would reduce the average void % of a number of private-rental dwellings at any one time from 1/26 to 1/52, that is from approximately 4% to approximately 2%. The Council should set up a low-profit municipal lettings agency to offer 12 month tenancies, setting a model and a competitive force in the market which would reduce the void rate and improve tenants' security. This could be included as an additional strategic policy,</p>	
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						<p>worded something like:-</p> <p>'The Council will seek to reduce the turnover in private lettings by working with landlords to achieve longer tenancies and thus reducing the proportion of properties empty at any one time due to tenant changeover, possibly by acting as intermediary between tenants and landlords to offer tenancies of 12 months or more '.</p> <p>2) encouraging owners and business tenants to make better use of flats above shops, which are often merely used for storage and in poor repair. For example, a policy could be:-</p> <p>'The Council will conduct surveys every 2-3 years of town centre and minor shopping parades to identify unused or under-used accommodation above shops and offices which could be brought or returned into residential use. It will work with owners to effect such re-use, through project-managing re-use, helping to identify contractors and suitable finance, finding tenants, and guaranteeing rents where appropriate. In some instances such premises could be made available to homeless</p>	
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						<p>families. ‘</p> <p>3) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. Owners could be encouraged by offering council tax concessions (no re-banding of the enlarged building for x years, or extension of the single-occupancy council tax concession for 1 or 2 years for a lone-dwelling owner who creates one or two habitable rooms for persons living with them as relatives or as lodgers in a family environment. This is not to encourage HMOs but rather for families to accommodate a young person who might otherwise have to move away (but often cannot now afford to) or to take in an aged parent, or a student or young migrant worker as a lodger. Many first floor flats (for example in my own street, Sirdar Road, N22) could be enlarged to accommodate a family with children, rather than just a couple, by addition of an attic conversion room.</p> <p>Following the lead of Zac</p>	
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						<p>Goldsmith's recent statement (http://www.standard.co.uk/news/mayor/zac-goldsmith-add-two-storeys-on-public-buildings-to-help-solve-london-housing-crisis-a3189821.html) , a large number of small sites for additional dwellings could be obtained by:-</p> <ul style="list-style-type: none"> - building an extra floor or two on top of single storey shops or other commercial premises - building over small car parks so that parking remains underneath residential buildings but is not the only use of the site - adding extra floors to public buildings - adding extra wings to existing blocks of flats, especially in the more spacious west of the borough and on medium-rise council estates some of which have ample land space around the blocks. Wherever there is a blank wall or a staircase at the end of a building, such additions might be possible. <p>The plan could say:-</p> <p>'The Council will undertake a</p>	
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						<p>survey of potential small sites for housing development consisting of addition of extra floors or wings to existing buildings, whether commercial or residential, or building on stilts over car parks, with a target of xx (=100 per year ?) units to be built in these ways across the borough, and encourage existing owners or community-led development organisations to make use of the sites identified with a view to providing social rented accommodation</p> <p>Further potential for freeing up accommodation for people who really want to live in Haringey could be obtained by offering older people who want to move out of London, especially owner occupiers who are under-occupying 3 or 4 bedroom homes, logistic help to move. I have written a further paper on this topic which can be supplied if it is of interest.</p> <p>d) <u>the absence of attention to energy saving and local power generation:-</u></p> <p>The strategic policies are surprisingly silent on these issues,</p>	
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						<p>particularly given Haringey's recent attention to a 'green borough' strategy.</p> <p>They should include something along the lines of:</p> <p>'All developments over xx units should be expected to make a contribution to reducing carbon emissions and averting fuel poverty, by such features as: solar panels, recycling of grey water or rainwater, thermally effective district heating systems, lighting in stairs and passages controlled by movement sensors.</p>	
1	RSP2	1.3.11 Alt 9	Not stated	Not stated	<p>Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete "to be"). Please refer to the accompanying cover letter (part (c) bullet 2).</p>	<p>Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete "to be").</p>	<p>It is agreed that "to be" as well as "proposed" should be deleted from this sentence.</p>
1	RSP9	Alt 9	Not stated	Not stated	<p>Alteration 9, Section 1.3, paragraph 1.3.11 should be amended to correct a typographical error in the second line (delete "to be");</p>	<p>As per response form</p>	<p>It is agreed that "to be" as well as "proposed" should be deleted from this sentence.</p>
12	RSP38	Alt 17 1.3.45	No	Not stated	<p>The proposed alteration states that the London</p>	<p>We request that the reference to the number of jobs and new</p>	<p>The Council does not consider that this adds</p>

					<p>Plan designates Haringey Heartland/Wood Green as an Area of Intensification with potential to deliver approximately 2,000 new jobs and 1,000 new homes as part of a mixed use development. The capacity identified in the proposed alteration is not in line with the London Plan’s approach i.e. <u>an indicative capacity</u> of 2,000 jobs, and <u>a minimum of</u> 1,000 new homes.</p> <p>We therefore <i>object</i> to the proposed alterations, as they are not consistent with the 2015 London Plan to secure an increased capacity to meet and <i>exceed</i> the housing target through redevelopment in Haringey Heartland/Wood Green.</p>	<p>homes are amended as follows: “...with potential to deliver approximately <i>an indicative capacity of</i> 2,000 new jobs and a <i>minimum of</i> 1,000 new homes as part of mixed use development”</p>	<p>any clarity to the Plan, especially as the alterations to SP1 (Table 2) clearly set out that within the Haringey Heartlands/Wood Green area the Local Plan seeks to deliver 4,595 homes. Further, across the Local Plan, provision is made to meet and exceed the Borough’s strategic housing requirement.</p> <p>No change</p>
10	RSP33	Alt 22 Para 1.3.62	Not stated	Not stated	<p>“Council is exploring opportunities to <i>create</i> a Cultural Area at Alexandra Palace to link</p>	Not specifically stated	<p>The Council stands by its aspiration to optimise the offer at Alexandra Palace.</p>

					up with the existing Cultural Quarter at Wood Green” This isn’t strictly correct as Alexandra Palace has a long standing tradition as a leading music, entertainment and leisure use from inception to this day.		No change
12	RSP39	Alt27 Strategic Objective 2	No	Not stated	Strategic Objective 2 (Alt 27) – It is noted that the revised housing requirement is calculated on the basis of the requirements from 2011-2014 based on the previous Local Plan annual target of 802, and from 2015-2026 based on the adopted 2015 London Plan annual target of 1,502. Whilst we do not necessarily object to the housing target being calculated, it is not consistent with the London Plan’s requirement to identify the objectively assessed housing needs to seek to <i>exceed</i> the London Plan target. In this regard, the	and consider that strategic objective for housing needs should expressly state that it will seek to meet and <i>exceed</i> the London Plan target in line with the amendments to Policy SP2 (ref: Alt30).	The Council does not consider that this adds any clarity to the relevant Policy SP2 which states ‘meet and exceed’ . No change

					<p>London Plan Policy 3.3 requires that Boroughs should seek to achieve and <i>exceed</i> the minimum annual housing target as part of the Local Plan preparation. Furthermore, it requires Boroughs to draw on the housing benchmarks in developing their Local Plan housing targets, augmented where possible with extra housing capacity and to seek to enable additional development capacity, particularly brownfield housing capacity, through, inter alia, intensification areas and mixed use redevelopment. We therefore <i>object</i> to the proposed alterations,</p>		
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Section 2.1, Haringey’s Spatial Strategy (Alt 28)

24	RSP63	Alt28 & Alt49	Not stated	Not Stated	<p>The Council notes that the Haringey Strategic Policies DPD has identified a borough housing supply figure of approximately 22,000 additional homes, which is significantly above the Objectively Assessed Need figure of 13,450 additional homes. It is also noted that the</p>	Not specifically stated	<p>Noted. The Council has identified a suite of sites which meet both our identified housing need in terms of that identified in the SHMA, and the</p>
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					<p>Haringey's affordable housing targets would be reduced from 50% to 40% and the tenure split would be changed from a 70/30 social rent/intermediate to 60/40.</p> <p>The Council considers these to be cross boundary strategic issues and would welcome further discussion with Haringey on these matters particularly in the context of Hackney's Local Plan review which has recently commenced.</p>		<p>London Plan housing target.</p> <p>No change</p>
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Section 3, SP1: Managing Growth (Alt 29-44, 102 and 104)

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RSP15	Alt30 SP1	Not stated	Not stated	We welcome the continued role of Haringey Heartlands and Wood Green as a Growth Area and the requirement to maximise site opportunities in these locations. We support the inclusion of Clarendon Gas Works within this Growth Area.	None stated	Noted.
3	RSP21	Alt30 Policy SP1	Not stated	Not stated	Berkeley Homes welcomes the amendments to Policy SP1 which seek to ensure the Council meet and exceed its strategic housing requirement of 19,802 homes over the plan period, achieved in part through the promotion of Tottenham as a key growth area but with recognition that development may also occur in other areas of the Borough.	Not stated	Noted.
5	RSP27	Alt30 SP1:	Yes	Yes	The Council are proposing the site forms part of the designated Wood	Not stated	Noted.

		Definition of Growth Area			<p>Green Growth Area which will be further established through the emerging Wood Green Area Action Plan (the Issues and Options of which is currently out for consultation and our formal representations are detailed later in this text).</p> <p>The orange shaded area is the designated Growth Area. This designation of the site is supported by Fairview and represents the exceptional opportunity that exists to deliver a high quality residential-led mixed use development that will provide new homes on a previously developed, underutilised brownfield site in a highly accessible and sustainable location.</p>		
27	RSP69	Alt30 3.1 Policy SP1: Managing Growth	Not stated	Not stated	<p>We note that the Council will expect development in the Growth Areas to maximise site opportunities, for areas such as North Tottenham and Tottenham Hale. Our concern is that the use of 'maximise' in this context could be contrary to the delivery of balanced sustainable developments in line with national policy (NPPF) e.g. consideration of environmental characteristics such as the heritage interests that should influence the development of sites. As an alternative, and to reflect both the NPPF and London Plan, the wording</p>	<p>The wording should be amended so that it focuses on <i>optimising</i> site potential rather than maximise</p>	<p>The term 'maximum' in the context of strategic provision, accords with the London Plan, specifically policy 3.3. On individual sites, the Council requires sites to optimise site potential based on a rigorous design led approach (See Policies DM1 & DM11 of the Development Management Policies DPD).</p>

					should be amended so that it focuses on <i>optimising</i> site potential rather than maximise. This approach would reflect the wording used in the later part of the policy when an explicit reference is made to change respecting the character s its surroundings.		No change
2	RSP16	Alt32 SP1 Table 2	Not stated	Not stated	We note that Haringey Heartlands and Wood Green Metropolitan Centre are identified for housing delivery of 4,595 homes up to 2025 (previously the target was 1,720). The Wood Green AAP Issues and Options Document (2016) Option Four (The favoured option of the Council) promotes a minimum of 6,000 new homes for a comparatively similar area (albeit the boundary areas are different). We consider that it would be prudent for the strategic housing targets to correlate to the Wood Green favoured option.	As per response form	The 6,000 home target relates to the Wood Green AAP, which is still at its earliest stage of preparation, and is still subject to more testing, including provision for a CR2 station serving the area, and will be subsequent to the Local Plan, replacing the current site allocations once adopted. It is therefore not appropriate to amend the figure in the Strategic Plan, at this stage to reflect an option in the draft Wood Green AAP. No change.
12	RSP40	Alt32 Table 2	No	Not stated	Figure 1 and Table 2 (ref: Alt 31 and Alt 32) – Whilst we support the principle of identifying a broad distribution for housing in each of the Growth Area, we are concerned	Not specifically stated	Table 2 corresponds with the sites identified in the Site Allocations and Tottenham AAP.

					<p>that the table and figure do not correspond. More specifically, Figure 1 does not provide a boundary of Haringey Heartlands and Wood Green Metropolitan Town Centre, while Table 2 identifies broad housing distribution for each area. In order to allow for flexibility in the emerging Site Allocations DPD and the AAP to refine the housing distribution, we consider that the housing distribution should be amalgamated.</p> <p>We <i>support</i> the amendment made to Table 2 to include the wording '<i>minimum</i>' in respect of the broad housing distribution in response to our previous representations, as this would be consistent with the requirement to exceed the London Plan's housing requirements.</p> <p>It is not clear how the capacity and distribution of new housing has been identified, as there is no evidence base document available. We request a further opportunity to comment on Table 2 once evidence base for this table is made available.</p>		No change
12	RSP41	Alt33 3.1.11	No	Not stated	The proposed alteration states that the London Plan designates Haringey Heartland/Wood Green as an Area of Intensification with	We request that the reference to the number of jobs and new homes are	The Council does not consider that this adds any clarity to the Plan, especially as the

					<p>potential to deliver approximately 2,000 new jobs and 1,000 new homes as part of a mixed use development. The capacity identified in the proposed alteration is not in line with the London Plan's approach i.e. <u>an indicative capacity</u> of 2,000 jobs, and <u>a minimum of</u> 1,000 new homes.</p> <p>We therefore <i>object</i> to the proposed alterations, as they are not consistent with the 2015 London Plan to secure an increased capacity to meet and <i>exceed</i> the housing target through redevelopment in Haringey Heartland/Wood Green.</p>	<p>amended as follows:</p> <p>potential to deliver approximately <i>an indicative capacity of</i> 2000 new jobs and a <i>minimum of</i> 1,000 new homes as part of mixed use development”</p>	<p>alterations to SP1 (Table 2) clearly set out that within the Haringey Heartlands/Wood Green area the Local Plan seeks to deliver 4,595 homes. Further, across the Local Plan, provision is made to meet and exceed the Borough's strategic housing requirement.</p> <p>No change</p>
22	RSP61	Paragraph 3.1.15	Yes	Yes	<p>We are pleased to note that the strategic policies document states that the Tottenham Hale Growth Area has undergone the Sequential Test. This is key to ensuring development is not located in an area of flood risk when other viable alternatives are available. We are also encouraged that the deculverting of the Moselle Brook is included as an aspiration for the Tottenham Hale regeneration scheme. This is key as culverted watercourses dramatically increase flood risk due to the possibility of blockages restricting flood flows. In</p>	Not stated	Noted.

					addition to this, culverts present major disruption to the riparian corridor, with loss of potentially productive riverside habitat.		
1	RSP3	Alt35 3.1.16	No	Not stated	<p>Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability:</p> <p>“...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth in the retail and leisure provision, and through increased community facilities...” Proposed Quod Alteration</p> <p>This is particularly the case because Chapter 5 confirms the site as being located within the Regeneration Area being the most flexible of employment categories that can include uses appropriate in a mixed use development, such as small</p>	<p>Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability:</p> <p>“...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth in the retail and leisure</p>	<p>It is considered that adding the text requested weakens the policy, rather than adding flexibility. The presumption is, that as Haringey is an inner London borough with generally good PTAL levels, that more, not less, intensive employment outcomes will be expected on existing employment sites, especially Regeneration Area sites. This approach is consistent with evidence and the need to meet the Council’s employment target.</p> <p>No change</p>

					<p>scale “walk-to” retail, community and residential uses. We also note that Policy SP8 is proposed to be amended to specifically include the Hale Wharf site in the Regeneration Area category, which is welcomed.</p> <p>Without those proposed changes, the plan is not sufficiently flexible as it not always appropriate for mixed use schemes to provide more intensive employment/business uses</p> <p>Please refer to the accompanying cover letter (part (c) bullet 3).</p>	<p>provision, and through increased community facilities...”</p> <p>Proposed Quod Alteration</p> <p>Without those proposed changes, the plan is not sufficiently flexible as it not always appropriate for mixed use schemes to provide more intensive employment/business uses.</p>	
1	RSP10	Alt 35	No	Not stated	<p>Alteration 35, paragraph 3.1, paragraph 3.1.16 should be amended as follows because it is not appropriate for all existing employment sites to provide more intensive employment/business uses, particularly mixed use schemes and sites with significant site constraints whilst also taking into account scheme viability:</p> <p><i>“...New jobs will be delivered through the reconfiguration of a number of the existing employment sites away from industrial & warehousing uses to mixed use providing more intensive employment / business uses (where appropriate), through further growth</i></p>	As per response form	It is considered that adding the text requested weakens the policy, rather than adding flexibility. The presumption is, that as Haringey is an inner London borough with generally good PTAL levels, that more, not less, intensive employment outcomes will be expected on existing employment sites, especially Regeneration Area sites. This approach is consistent with evidence and the need

					<p><i>in the retail and leisure provision, and through increased community facilities...” Proposed Quod alteration</i></p> <p>This is particularly the case because Chapter 5 confirms the site as being located within the Regeneration Area being the most flexible of employment categories that can include uses appropriate in a mixed use development, such as small scale “walk-to” retail, community and residential uses. We also note that Policy SP8 is proposed to be amended to specifically include the Hale Wharf site in the Regeneration Area category, which is welcomed.</p>		<p>to meet the Council’s employment target.</p> <p>No change</p>
1	RSP4	Para 3.1.18	No	Not stated	<p>This paragraph seeks the requirement of a pedestrian green link at the Hale Wharf Site. However, the Planning Obligations SPD confirms that open space and public realm infrastructure will be funded through CIL. It is therefore inappropriate for this supporting paragraph to continue to require that such connections be included as part of detailed scheme proposals for Hale Wharf.</p> <p>This paragraph therefore is not the most appropriate strategy when considered against reasonable alternatives, failing this soundness</p>	<p>The paragraph should be amended and the requirement to incorporate one element of the east-west pedestrian green link removed.</p>	<p>The paragraph questioned doesn’t mention funding for the east-west pedestrian link. In any regard, it is considered to be a key piece of place-making infrastructure in the Tottenham Hale Area and a site specific requirement for Hale Wharf to make redevelopment of the site appropriate in planning terms.</p> <p>No change</p>

					test. Please refer to the accompanying cover letter (part (c) bullet 4).		
26	RSP67	3.1.33	Not Stated	Not Stated	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.	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.	It is considered that this is addressed through Policy NT5 of the Tottenham Area Action Plan. No change
4	RSP26	Para 3.1.35	Yes	Yes	THFC continue to support the promotion of development in the North Tottenham Growth Area (which includes Northumberland Park, the redevelopment of THFC Stadium and High Road West). THFC also support the identification in supporting paragraph 3.1.8 that Areas of Limited Change can make an important contribution towards the overall local development needs of the Borough, especially given the minimum number of new dwellings that Table 2 identifies are expected to come forward in Areas of Limited Change (4,260 units). 10. Supporting paragraph 3.1.34 describes the Football Club as Haringey’s most significant visitor attraction . Supporting paragraphs 3.1.35 and 3.1.36 describe the	<i>“Provision of appropriate retail and leisure uses to deliver the premier leisure destination in London;”</i>	This paragraph was not subject to alterations, and therefore the suggested changes are out of scope. However, It is important that the term appropriate is retained, to respect the network of centres within the borough. The aspiration to deliver the premier leisure destination is shared however, and is set out in the Tottenham AAP. No change

					<p>Council's aspirations for the redevelopment of THFC stadium and how further details will be set out in an Area Action Plan. Further comments on the Tottenham Area Action Plan (AAP) are set out below. Under the 'Spatial Vision for Tottenham', the AAP describes the THFC Stadium and the area as the "premier leisure destination" in London. THFC are wholly supportive of this objective, however in order to aid the effectiveness of both policy SP1 and the AAP Vision, the aspirations under paragraph 3.1.35 of the Strategic Policies document should be amended as follows (deleted text struck through, proposed text in red):</p>		
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Section 3, SP2: Housing (Alt 45-65)

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RSP 64	Alt42 SP2	Not Stated	Not Stated	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	Not Stated	Noted. Regard has been has to London Plan Policy 3.3, with regard to additional capacity, which has resulted in the identification of capacity for

					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'.		22,000 homes – more than 2,200 above the minimum housing supply target and excluding windfall supply. No change
20	RSP 51	Alt47 SP2	No	Not stated	We argue that several policies and proposals made in the <i>Alterations</i> do not meet the existing local communities' requirements (from both residents and businesses). On the contrary, they represent an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. This particular affects Tottenham , as a significant amount of foreseen development is concentrated in this part of the Borough (see our separate response to the Tottenham AAP). Additionally, they fail to demonstrate how the revised Strategic Policies will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on). The <i>Alterations</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of	Not specifically stated	Urban Characterisation work undertaken by the Council identifies that the borough is a mix of urban and suburban areas.

				<p>Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.</p> <p>a) In several ways the <i>Alterations</i> do not fulfill, or they contradict, some of the objectives laid out in para. 3.2.2, Policy SP2 HOUSING, in particular: 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'.</p> <p>b) The objectively assessed requirements are for building as much genuinely affordable housing as possible, as well as meeting a deficit of green space in the densely populated wards of Tottenham. The Strategic Housing Market Assessment (http://www.haringey.gov.uk/sites/haringeygovuk/files/strategic_housing_market_assessment.pdf, p. 8) shows that 58% of currently resident households could not afford to pay even 80% of market rents in 2010. Since then, there has been rapid growth of both house prices and rents, making that assessment seriously out of date with its assumptions of very low inflation of housing costs in 2010-16. The <i>Alterations</i> (Para 3.2.18) state that the Council 'aims to ensure an adequate mix of dwellings is provided' but there is no detail as to how this will be achieved, especially with regard to social housing for families.</p> <p>The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered (see Tottenham AAP). Given the extensive need in Haringey for social</p>		<p>The Local Plan clearly seeks the maximum amount of affordable housing viable on each site. This will help to meet local affordable housing need.</p> <p>In order to build the homes that will help to meet housing need, densities are required to</p>
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				<p>housing for families, how can this approach be described as a 'strategy which seeks to meet objectively assessed requirements?' The Council says responding to family housing need is 'a priority for the Council', so the question is, will this plan address this in making provision of family housing for people living here?</p> <p>The proposals for the "renewal and improvement" (including demolitions) of the council housing estates listed in SP2 point 10, p. 42, do not include comprehensive detailed options for re-housing families living in, at minimum, like for like accommodation. Neither are there alternative options for improving the estates so people can remain there. This is not objective in any sense. Yet this is the priority group in housing need. A large consultation exercise carried out by the Council to gauge people's priorities showed that the main issue of concern to local people in Tottenham was provision of social housing, and the need to tackle rogue landlords.</p> <p>There are serious questions which need to be answered regarding the concept of 'rent'. 'Affordable' levels (defined as 80% of market rent in the plan and the London Plan) may not be affordable, especially if we add the substantial service charges which both social and private landlords charge in addition to rent in many buildings (see next section).</p> <p>c) The Council's Sustainable Community Strategy (2010-2016)³ states 'We will continue to increase the availability of affordable housing through the optimum use of existing dwellings and by building more affordable homes'. With Government cuts and caps to benefits affecting thousands of local</p>		<p>increase. Thus increasing density is required to meet need, not cover costs. Existing family housing is to be protected from loss through conversions.</p> <p>Replacement affordable housing will be provided on all estate renewal projects involving demolition on a per square metre basis. This will allow replacement stock to better meet local need.</p> <p>Affordable rent is a national and regional planning policy, and is prioritised through the grant regime by the GLA.</p>
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				<p>residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. For people in housing need in Haringey this means social rented housing. Yet, the Council has not produced any alternative option which demonstrates how this might be achieved, even within the current housing and planning environment. Councils such as Islington and Brighton have used different strategies, but the <i>Alterations</i> rely on simply working with developers and the private rented market. The LB Islington Housing Strategy 2014-2019 challenges the concept of 80% market rent being a suitable ceiling of 'affordability', works to curb bad landlords and secure longer more secure tenancies, and seeks to make council homes cheaper to run. In Brighton, the Estate Regeneration programme⁵ focuses on identifying small infill sites within existing council estates and building on them subject to detailed consultation work with local residents. The plan needs to provide enough social housing to meet the needs of Haringey's housing waiting list within a 5 year period, plus enough for population growth. The waiting list had 8,362 people in 2013; since then the lower-priority categories (bands D and E) have been removed from the list. The ostensible reason was because it was unmanageably large, but removal of these two bands also conceals the extent of housing need, and the numbers of people living in private, temporary and substandard, overcrowded and sub-standard accommodation. In this context, the 2013 figure may give a better idea of concealed housing need than the up-to-date one.</p>		<p>The Council is building smaller infill developments as well as looking at more comprehensive redevelopments. Many of these do not require an allocation however.</p> <p>Building more houses, including affordable houses, will</p>
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				<p>In addition, the plan needs to meet the requirements of population growth, assuming that this will follow the trajectory of the last decade minus the portion of that population growth attracted by residential building for sale at Hale Village and the New River development, the major new developments of that period. To accommodate the 2013 waiting list, the absolute minimum number of new social housing units should be around 8,360 plus an additional 1,700 every 3 years to cater for population growth, even before considering any further increase in the proportion of households who cannot afford market rents. In summary, our estimate is that, before considering any change in that proportion, Haringey would need at least 16,300 social rented units over 15 years or 1,066 per year. This is more than 100% of the previous building targets for all types of housing before the London Plan was revised in 2015, showing that without the excessive densification now proposed, Haringey would need to find ways of helping some of its residents to meet their housing needs in other boroughs which are currently less crowded or in ‘new town’ type developments outside London. Even if the new target of over 20,000 homes could be achieved without excessive densification (which we very much doubt), over 75% would need to be genuinely affordable to achieve the central objective of Housing Policy 3.2.</p> <p>Remarkably, Haringey Council’s own Joint Strategic Needs Assessment states that ‘to address both projected newly arising need and the current backlog, an annual programme of over 4,000 additional affordable homes is estimated to be required’ (see http://www.haringey.gov.uk/social-</p>		<p>have a beneficial impact on the housing waiting list.</p> <p>The Housing Strategy says more on ‘affordable rent’ rent levels.</p> <p>Viability testing identified that 40% was the maximum viable housing target within the borough.</p>
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				<p>care-andhealth/health/joint-strategic-needs-assessment/other-factors-affecting-health/jsnhousing#levelofneedofpopulation). This simply cannot be achieved without overspill to other areas. But it is clear that the <i>Alterations</i>’ target of only 40% of units to be ‘affordable’ is absolutely inadequate and there is little clarity that ‘affordable’ would include social rented housing which families in Tottenham on low incomes could afford.</p> <p>In asking if this plan is justified, one of the required criteria is ‘evidence of participation of the local community and others having a stake in the area’.</p> <p>There is not enough evidence of community participation encouraged or promoted by the LPA in this final round of consultation which goes beyond a minimum. Independently of this part of our submission, we presented a more detailed analysis of the consultation process and its shortcomings (see text box below). The Council posted the consultation on its website and offered two hour sessions for people to attend at local libraries, at hours most people could not make, even if they were aware of the sessions. These were not very well publicized, and were very poorly attended. This is not the fault of local people. There were no public meetings to explain these plans even though the consultation runs for several weeks. The Council’s borough-wide magazine <i>Haringey People</i> – which goes to households directly – did not include one word or reference to this consultation (see http://www.haringey.gov.uk/news-and-events/haringey-people/haringey-peoplearchive).</p> <p>This would have been the most effective method for directly communicating with residents.</p>		<p>The consultations undertaken in the preparation of the Plan have been held in accordance with the Town and Country Planning Regulations, and the Council’s Statement of Community Involvement.</p>
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				<p>The documents are hard to read on line yet active residents’ groups had to ask and press for printed copies in order to meet with their members.</p> <p>The Supreme Court in the Moseley v Haringey Council judgement set out conditions for fair consultation. Amongst the four criteria it states that ‘the proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response.’ It is questionable as to whether this condition to allow for ‘intelligent consideration and response’ has been met with regard to this vital consultation on the Local Plan.</p> <p>We would like to challenge some key assumptions and evidence base used to justify the Alterations to Policy SP2 HOUSING under 3 broad themes:</p> <p>Overall scale of housing growth and implications for existing and future social infrastructure The question of affordability The chosen approach to housing provision and to ‘housing estate renewal’</p> <p>1.2.1 Overall scale of housing growth and implications for existing and future social infrastructure</p> <p>a) The Alterations to the Core Strategy have been prompted by the adoption of the Further Alterations to the London Plan (FALP) which were adopted in March 2015. The Haringey Local Plan has to comply with the FALP and thus the proposed alterations reflect the major changes in housing and employment targets which were included in the FALP. The strategic housing target for Haringey was increased from 820 homes per annum to 1,502 homes per annum on the basis of the GLA SHLAA -</p>		<p>Options are often limited where the Local Plan must be in conformity with the London Plan and national planning policies, and the requirement that policies be justified (i.e. supported by robust evidence) and deliverable.</p> <p>The Local Plan shows how FALP housing targets can be met. As stated, the opportunity to challenge the spatial distribution of London’s</p>
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				<p>an 83% increase.</p> <p>This is the single highest increase of any London Borough (the increases ranging from 3% for Greenwich to 83% for Haringey. The distribution of targets across London Boroughs displays a bias towards poorer (and denser) Boroughs, the ones which suffer from highest levels of deprivation. It is highly questionable whether Haringey land and infrastructure have the capacity to accommodate so many extra homes and the London Plan target needs to be challenged, in particular compared to the much lower rates of expansion given to West Central and Outer South-eastern boroughs. We strongly context and oppose this massive increase affecting the Borough of Haringey. We made a submission during the public consultation on the Further Alterations to the London Plan in 2014 (here https://www.london.gov.uk/sites/default/files/302OurTottenhamPlanningPolicyWorkingGroupResponse.pdf) and presented evidence at the EiP at Session 2b (Housing need and supply) on Wednesday 3 September 2014 to make this argument. It was ignored in the subsequent version of the FALP post-EiP. These figures are unsustainable, unrealistic and unfair. The strategic priority given to new, large-scale development in Tottenham in the London Plan and in the Haringey Local Plan consultation documents cannot be realized at the expense of the people already living and working there. In the response by the LB Haringey to the consultation on the Further Alterations to the London Plan (in 2014), Steve Kelly, Assistant Director of Planning, himself noted that this was a 'stretching' target that it would not meet on its own without external GLA funding and support</p>		<p>growth was through the London Plan Alterations. Having been the subject of due process, including an examination in public, and found sound, the policies of the London Plan, including the strategic housing requirements allocated to each borough, forms the extant Plan for managing London's growth.</p>
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				<p>(https://www.london.gov.uk/sites/default/files/027L BHaringeyResponse.pdf).</p> <p>b) The plan seeks to fulfill arbitrary targets imposed by the London Plan. The latest revisions to the plan increased the number of housing units to be built by 83% which can only be done by imposing unsuitably tall buildings in North Tottenham, along the Lee and at Broadwater Farm; demolishing structurally viable buildings, some less than 40 years old; destroying communities and destroying the suburban character of neighbourhoods. The London Plan may well be revised when a new Mayor comes into office in May 2016. The need is to bring down these unrealistic targets for building in Haringey, especially in Tottenham, and redistribute building targets across the borough and the city. To meet the currently imposed targets means a form of building on many sites which if presented as an isolated planning application would be regarded by any reasonable precedent of the local planning committee as over-development.</p> <p>c) There are several alternative ways of making a larger number of homes available in the borough as we point out under paragraph 4 below.</p> <p>d) It is clear that a significant part of this new increasing housing target is going to be directed to particular parts of the Borough: the Eastern part - and more specifically Tottenham. The Alterations to the Core Strategy increase the number of homes to be delivered within the wider Upper Lee Valley Opportunity Area, which includes a growth point at Tottenham Hale, from 9,000 homes to 20,100. In the Site Allocation DPD and Tottenham AAP it is stated that half of the strategic housing target (=10,000 homes) imposed on Haringey by the latest</p>		<p>Housing targets are not considered to be arbitrary, but statutory.</p> <p>The overall spatial pattern of development is not being changed by the alterations in the Local Plan: Strategic Policies.</p>
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				<p>Alterations of the London Plan should be located in Tottenham. This is not realistic and potentially highly damaging to the existing residents and businesses. Several wards of Tottenham already have the highest densities in the Borough (see table and map submitted with response). Bruce Grove, Saint Ann's Seven Sisters and Tottenham Green have densities which range from twice to three times the density of the wards in the Western part of the Borough (such as Highgate).</p> <p>White Hart Lane, Northumberland Park and Tottenham Hale have lower densities than the above mentioned wards, but this is due to the presence of large areas of employment land and valuable housing estates – which means that the population density in the residential areas of those North Tottenham wards is high, too.</p> <p>This foreseen housing target is far too high for the existing infrastructure of Tottenham and will place a strain on social infrastructure, in particular health facilities (already seriously deficient, as shown by the recent Healthwatch Report on the deficit of doctors in SE Tottenham) as well as on schools and road capacity. How and where will social infrastructure be provided to accompany the planned 10,000 new homes is absolutely not demonstrated in the Site Allocation DPD and Tottenham AAP (see our separate responses on these two documents for more precise evidence on the deficit of social infrastructure in Tottenham, in relation to health, open space and schools).</p> <p>This would also mean either unduly dense and very tall development, conflicting with the historic character of the area, with social sustainability and environmental objectives; or it would mean</p>		<p>It is agreed and acknowledged in the Local Plan that infrastructure needs to grow to meet the needs of a growing population to ensure sustainable development.</p> <p>The proposed new health facilities are predicated on</p>
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				<p>sacrificing valuable green space, needed employment land, and absolutely necessary social housing on existing estates.</p> <p>a) The assumptions in the <i>Housing Market Assessment</i> about growth rate of house prices and rents are far too low. Values applied to the viability calculations (i.e. how many ‘affordable’ units developers can reasonably be asked to build whilst leaving them an ‘acceptable’ profit) may be out of date given that many sites are public land whilst sales values for homes to be built in the next few years will be affected by the unexpectedly rapid growth of house prices in 2014-15. For example Table 1, p. 10 states that ‘medium value’ areas like Wood Green (N22) had a price at the base date (Dec 2010) for a 3 bed, 4 person flat of £280k but even 2 bed flats are now over £400k and even in N17 they are typically over £350k. Appendix B 1.2 table 5 has the assumption that house prices (HPI) will hardly rise between 2010 and now. But they have risen enormously! Average sales prices of residential property rose 10.71% over the last 12 months in N17 (compared to 10.28% in N15 and 9.6% in London as a whole) and 46.59% over the last five years (compared to 49.17% in N15 and 40.17% in London as a whole – data from Zoopla web site on Jan. 19th 2016). The rise in house prices and rental values in Tottenham is especially out of line with local incomes, since as noted in Haringey’s Homelessness Strategy, there is a gap of £16,000 between average incomes in the east and west of the borough, and according to the Housing Market Assessment a gap of over £12,000 in the median income. The London Poverty Profile data shows Haringey lower quartile rents are £1,257 monthly</p>		<p>the growth included in the Local Plan, as evidenced in the Infrastructure Delivery Plan.</p> <p>New schools are proposed based on the School Place Planning Report, which also includes development from the Local Plan’s housing trajectory.</p> <p>The Local Plan identifies a suitable range of sites to meet the housing need in the borough while safeguarding the borough’s employment assets, heritage assets, and open space.</p> <p>The setting of affordable rent levels is outside</p>
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				<p>and lower quartile GROSS earnings are 74% of lower quartile rents.⁷ This means that the conclusion of the <i>Housing Market Assessment</i> that most of the new housing will be ‘unaffordable’ for existing Haringey residents is truer now more than ever. This also means that genuinely affordable housing is needed at rents that can be afforded by households on those incomes.</p> <p>b) There is also considerable ambiguity about what the affordability of ‘rent’ means in the context of the ‘affordable rent’ concept. ‘Affordability’ is defined to mean 80% of market rent but the rise in market rents of recent years has been much faster than incomes. Moreover a rent which is ‘affordable’ may not be so if we add service charges, which could be considerable, especially in high rise buildings which need lifts, water pumps and cradle-suspended operations for window cleaning and for external painting.</p> <p>c) The recent growth of rents and house prices also means that many of the viability calculations on particular sites are thrown into question – as sales values rise more than was expected, developers will obtain a windfall gain and should be required to build a larger proportion of genuinely affordable units and/or pay larger s.106 contributions. For example, in the case of the redevelopment of St. Ann’s Hospital, in South Tottenham, the community group which formed the St Ann’s Redevelopment Trust finally got the viability assessments disclosed after planning consent was granted. The independent viability assessment commissioned by Haringey calculated that there could have been more affordable housing on the site than the 14% figure which the Council and developer settled for</p>		<p>the scope of the Local Plan.</p> <p>The definition of affordable housing, including affordable rent, is that set out in the NPPF</p> <p>As set out in the Planning Obligations SPD, developments are subject to reappraisal on commencement, and phased stages and/or ‘claw back’ arrangements, to ensure an uplift in values are taken into</p>
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				<p>(i.e. a further £23m worth of affordable housing). Where developers can make an acceptable level of profit with a higher proportion of affordable homes, the argument for densification falls, and with it the case for the imposition of tall buildings on a suburban landscape, with huge pressure on green space and social infrastructure and attendant risks about the unaffordability of future maintenance charges. This is especially an issue for Northumberland Park.</p> <p>The chosen approach to housing provision and to 'housing estate renewal'</p> <p>a) There is an assumption that bringing in higher-income residents by intensive high-rise development will produce 'mixed communities'. What does this mean? The intended inference is that Tottenham is not a mixed community now. This is a deeply flawed and spurious argument both with regard to Council estates and Tottenham as a whole. Our estates, and Tottenham as a whole, are very mixed communities indeed. The postcodes N17 and N15 are reputed to be the most diverse in Europe, and these of course are the target Tottenham postcodes for this plan. Council estates are mixed – by race, class, culture, socio-economic status and, since the Right to Buy, by housing tenure, with some leaseholders and some private tenants of leaseholders. These estates are not islands – they are in local communities and have rich and extensive social networks as evidenced by the many groups, associations and community organizations. The membership of Our Tottenham evidences this. This has also been demonstrated by research recently carried out by University College London (the Bartlett</p>		<p>account in the level of obligations due, including affordable housing.</p> <p>In the example given, the money generated by the development is being used to fund strategic provision of healthcare facilities and services – and therefore helps to address Our Tottenham's concerns over adequate provision of social infrastructure.</p> <p>Private housing form part of Haringey's housing needs and is required to help pay for strategic infrastructure to</p>
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				<p>School of Planning).</p> <p>b) There is no evidence that the development of 'mixed' communities by densification of existing housing estates and change of use from industrial to residential on council-owned industrial estates will be beneficial to the local community, either in terms of housing or employment. We presented in our earlier response submitted in March 2015 (see text box in response) a mass of academic and policy research evidence to show that drawing in higher-income residents to 'dilute' council estate populations leads to disruption of community networks, class-segregated living and social tension, rather than greater cohesion. The history of many London estates where this 'solution' has been applied testifies to this, and there is extensive academic research which confirms it.</p> <p>c) Community stability, adequate green space and community facilities are the key to low crime and tenant satisfaction. Densification is hostile to these objectives. In this connection we would mention a statement by <i>Architects for Social Housing</i> citing a survey that Broadwater Farm has a very low rate of crime, a very high rate of tenant satisfaction with regard to safety¹⁴ and very low rent arrears. The plan asserts that the proportion of social housing in Tottenham, particularly in North Tottenham, is excessive.</p> <p>But no objective criterion or argument is given about what constitutes the 'ideal' tenure mix, or over what area it should be measured. According to the Haringey Joint Strategic Needs Assessment (Fig. 1 in http://www.haringey.gov.uk/social-care-and-health/health/joint-strategic-needs-</p>		<p>support new and existing communities as well as to deliver affordable housing.</p> <p>More intensive development is required to meet housing needs.</p>
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				<p>assessment/otherfactors-affecting-health/jsna-housing), Haringey as a whole has a proportion of social rented housing very little above the London average. Moreover, given the current crisis about affordability of housing in London, the central objective of the plan as stated in Housing Policy SP2 can only be achieved if a high proportion of social housing is maintained. It should also be noted that estates originally built as council housing are now effectively mixed tenure since a significant proportion of homes have been purchased under the right to buy, there are leaseholders living on estates, and other properties are now let out by private landlords.</p> <p>d) The plan does not deliver its objective of providing for the housing needs of the Haringey population, as stated in point 1 above. Where and how will those people and families displaced by these plans be housed? The plan has no detail on these critical points.</p> <p>e) Nor will it provide jobs for them, since the jobs associated with construction of new housing will be temporary and most local residents do not have the skills to access them; and moreover the plan involves the loss of many cheap, accessible small business premises of the type that Tottenham needs, both industrial and retail.</p> <p>f) The rise in private sector rents, induced by the expectation of a 'gentrification' of Tottenham and the continued grave shortage of social housing, will force many more residents to have to seek homes in neighbouring outer boroughs, for example Enfield, Waltham Forest and Redbridge, as well as beyond the north and eastern boundaries of London. This will put pressure on housing markets and waiting</p>		<p>The right to buy makes it almost impossible for the level of social housing to be maintained.</p>
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				<p>lists there, and on transport infrastructure as they try to commute to jobs in Haringey or in central London and to continue at local schools in Haringey so as not to disrupt children’s education. But there is no guarantee such housing exists. In particular in any site where it is proposed to demolish housing association stock, the price paid by the Council or its development partner(s) to the housing association may not be enough to finance building or acquisition of equivalent units elsewhere to re-house the tenants, who will be the housing association’s responsibility. There will then be a displacement effect on social housing waiting lists elsewhere in London as the housing associations struggle to find homes to re-house people whose homes they have sold for demolition.</p> <p>Is it the most appropriate strategy when considered against the alternatives?</p> <p>No. There is no assessment of the comparative economic and social costs of providing a given number of homes by demolition and rebuilding versus the cost of refurbishing, extending and converting many of the existing ones. Even some office blocks could potentially be converted to housing by stripping out the interior and leaving the basic structure standing. Architects for Social Housing (https://architectsforsocialhousing.wordpress.com/page/2/) have illustrated in the example of Knights Walk in Kennington how refurbishment and extension of existing buildings, for example by building additional storeys, can be much cheaper than rebuilding, as well as far less disruptive to existing residents and less wasteful of environmental resources. According to a report from</p>		<p>The Council objected to the changes to government policy of converting office stock to residential without the need for planning consent. Disregarding for a second the principle that the Local Plan cannot control this change at present, it is considered that when applications of this type come</p>
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				<p>the Urban Lab and Engineering Exchange at University College London, ‘there is a growing body of research suggesting that extending the lifecycle of buildings by refurbishment is preferable to demolition in terms of improved environmental, social and economic impacts’15. See also the <i>Our Tottenham Housing Factsheet: Demolition vs Refurbishment</i> http://ourtottenham.org.uk/our-tottenham-factsheet-housing-demolition-vrefurbishment/.</p> <p>Historically the decision to refurbish or rebuild has been subjected to NPV analysis, along the line for example of the model used by Sovereign Housing Association (see https://www.sovereign.org.uk/aboutus/strategic-asset-management/). We would expect to see a similar assessment of whether the Haringey Plan’s proposals for estates such as Northumberland Park or Broadwater Farm represent best value for public money, taking into account also the intangible <i>social</i> costs and benefits of each alternative such as keeping the community together and continuity of children’s schooling. For one specific group of estates, the ‘Orlit’ homes in Bounds Green, the site DPD argues that refurbishment is technically impractical, but we have spoken to residents who are convinced otherwise and heard of an internal Council report which said refurbishment is technically feasible.</p> <p>Much greater attention is needed in the <i>Alterations</i> to the possibility of creating extra low-cost homes and reducing rent levels by:</p> <p>a) bringing into residential use rooms and flats above shops which are currently empty or used for storage, including in particular the many shops</p>		<p>forward, the Local Plan’s policies promote a positive response which will create improved employment and residential uses.</p> <p>There is a great deal of refurbishment of existing publicly owned housing stock taking place across the borough.</p> <p>The Local Plan supports bringing the</p>
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				<p>owned by the Council.</p> <p>b) control of rents and of the quality of private sector lettings by registration of landlords and by creating competition from a non-profit best-practice lettings agency, which could be run as a municipal enterprise with minimal tenancy setup charges and low commissions to landlords who offer a fair deal.</p> <p>c) inducing private landlords to let for longer tenancies, thus reducing the vacancy rate due to churning of tenants (approximating to almost 5% if flats remain empty for 1 week every 6 months, but only 2.5% if tenancies last a year with a week's vacant period in between. This factor alone could 'provide' the equivalent of an extra 700 homes just by reducing the vacancy rate). It could be done through a nonprofit lettings agency as proposed above. It should be noted that 17% of the households becoming homeless in Haringey become so because of no-fault evictions at the end of short term tenancies, requiring about 100 social rented vacancies per year.</p> <p>d) buying empty and hard-to-sell homes to let to homeless families through a municipal housing company (along the Enfield model) which would buy empty or under-occupied homes and save the huge cost of temporary accommodation for homeless families, thus freeing up more money for refurbishments/new building.</p> <p>e) facilitating self-build and community non-profit developments (by community development trusts or coops) on small and large sites. The Plan fails to, for example, adequately promote Community Land Trusts whose average 3% of surplus margins sought are clearly more appropriate when contrasted with the obscenely inflated and</p>		<p>space above shops back into use.</p> <p>The Council has already established a not for profit lettings agency.</p> <p>The creation of longer tenancies and different tenancy types is outside the scope of the Plan, and is an issue that the Housing Strategy will address.</p> <p>The proposition that the Council will not accept alternative forms of housing provision is incorrect. The</p>
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				<p>unacceptable profit margins being sought by most profit-led property development. Such property development, upon which the current Plan has chosen to rely, is presented as ‘the only show in town’ and used as justification for failures to implement or enforce social infrastructural, affordable housing and s106 obligations. Low-rise building could be done using prefabricated units which are cheaper and quicker to build than conventional construction methods.</p> <p>f) use of space over car parks, so that housing could be built over them with parking only at ground level, and car parking would rarely be the only land use for spaces currently used as car parks. Several hundred homes could be accommodated in this way at sites such as Stoneleigh Road N17 and Summerland Gardens N10.</p> <p>g) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. This could be encouraged in particular areas in partnership with local small builders and selected banks to provide finance for home extensions/attic conversions, and would provide opportunities for solar panels and quality insulation to be incorporated into the works, thus increasing the sustainability of the housing stock. There would be substantial spin-off benefits in terms of job creation, development of refurbishment/repair capacity in the local construction sector, improved community cohesion, lower childcare and elder care costs due to families being able to stay together if they wish.</p> <p>h) logistical help for older people who own much larger homes than they need (3-5 bedrooms) to let</p>		<p>Council is starting the process of building its own homes, and will treat applications for self-build on their merits.</p> <p>Sites which can intensify assets such as car parks will be treated on their merits.</p> <p>The Council’s policy supports suitable extensions to existing houses to create new units. It is important that these are in the right area, where the stock can support this change, and the facilities such as bins can be appropriately provided.</p>
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				<p>rooms or find suitable ways to sell up and move to smaller accommodation, possibly outside London, if they want to.</p> <p>i) enhancements and improvements to more single storey retail sites to make use of any available additional space, where appropriate.</p> <p>j) reduction of refurbishment/maintenance costs for social housing by adopting a different way of doing the works; this might mean re-constituting a direct labour force (with attendant important opportunities for training local youth) and/or offering tenants a cash-back on part of their rent for doing minor repairs that they are competent and willing to do, for example painting, some kitchen fitting, and some repairs to windows, doors, locks, taps, light fittings and floors, garden fences and gates. These are all things which owner-occupiers often do for themselves.</p> <p>k) having clear contract and/or planning conditions with developers that sites developed on public land must include social rented council homes which could be funded via the private sector element of the development.</p> <p>If the intention is to have a genuinely ‘mixed community’ which meets the housing needs evidenced in many reports, the Local Plan should include these other options and ideas.</p> <p>Regrettably the phrase ‘mixed community’ appears to be used in the context of the Haringey Local Plan in the way critiqued by some academics ‘who question the evidence base for social mix policies and rhetorics that advance processes of gentrification’ (<i>Mixed Communities; Gentrification by Stealth?</i> Edited by Gary Bridge, Tim Butler and Loretta Lees, 2012, Bristol: Policy Press).</p>		<p>Helping people in unsuitably large homes to “free up” this accommodation is sensible, but not a planning matter.</p> <p>The Council refurbishes much of its housing stock, but the decisions taken on this are outside the scope of the Local Plan.</p> <p>The principle of private development cross subsidising new public housing is supported.</p> <p>The Local Plan seeks to build new homes to meet housing need in the borough. It does not have policies</p>
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				<p>We have several concerns regarding the effectiveness of the proposed <i>Alterations</i>.</p> <p>a) The <i>Alterations</i> will result in expulsion of many residents who will be ‘priced out’ of Haringey into neighbouring areas or out of London altogether. In the meantime, rising rents brought about by the introduction of higher-value housing and the attendant uplift to the property market for older homes will mean a higher housing benefit bill, increasing arrears and increasing homelessness.</p> <p>b) There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need, nor any assessment of the need for school places. There is no provision for additional community centres despite the loss of the Welbourne Centre, the ambiguity with regard to the Broadwater Farm Community Centre and even the possibility of losing Tottenham Chances if a developer comes forward with a proposal that appears to justify the loss of a listed building. Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. But if there is no specific provision of additional childcare space in the new buildings, either this policy will be unworkable or it will result in an exacerbated shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use. There is a very serious lack of health provision, especially in</p>		<p>which seek to price local residents out of the borough.</p> <p>The Infrastructure Delivery Plan sets out how critical infrastructure will grow to meet the needs of Haringey’s growing population.</p> <p>Policy DM51 manages how early years provision can be provided, with an emphasis on protecting family housing stock, and ensuring that new</p>
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				<p>Tottenham Hale. With a further 5,000 homes proposed, there should be detail about how services will be provided.</p> <p>There are fine aspirations about traffic and the infrastructure (para 3.1.19 of the <i>Alterations</i>) but much of this does not relate to real experience. Para 3.1.19 states that 'the £37m Tottenham Hale transport scheme has sought to reduce the impact of traffic on the local area, and increase capacity to cope with future demand. This will enable the regeneration of the area as set out in the Area Action Plan...' The Tottenham Hale gyratory works are complete, yet the traffic is as gridlocked as ever, and access routes, such as Ferry Lane are extremely congested. How will an additional 5,000 homes, (possibly an additional 10,000 people) be accommodated?</p> <p>c) According to Cabinet papers revealed to the public on 17.11.2015, the Council envisages extensive use of a single private sector partner for development, in a 50/50 jointly owned venture company, but this exposes the Council, our public assets and the community to serious risks. What if the chosen development partner goes bankrupt, or uses its enormous market power to bargain for higher profits and less affordable units? What if the company gets into financial difficulty and reneges on whatever commitments will be made about s.106 contributions, affordability or guarantees of re-housing to existing tenants? It is important that site development should rely on a variety of actors and development partners in order to spread the risks and to avoid any profit-driven party having undue market power. The joint venture arrangement appears to give no opportunity for community</p>		<p>facilities are of a good standard.</p> <p>While the Council is beginning to create its own development capacity, it is recognised that this will not be sufficient to meet the needs identified.</p> <p>It is therefore essential that the Council works with the private sector to ensure that the</p>
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				<p>partners such as coops, community land trusts or social enterprises.</p> <p>Is it deliverable?</p> <p>Many of the <i>Alterations</i> are potentially not deliverable.</p> <p>a) The plan involves serious over-development of many sites as already stated in point 2(d) above.</p> <p>b) Some of the sites which will have very dense development are in flood risk areas, particularly near to Tottenham Hale. The densification of housing will itself increase the flood risk with more land built over and unable to absorb rainwater into gardens and landscaped areas.</p> <p>c) The Council has expressed a preference for a very small number of development partners, which renders the plan vulnerable to being ‘beaten down’ in negotiations on the proportion of ‘affordable’ units and on infrastructure contributions, as with the Spurs development.</p> <p>d) The <i>Alterations</i> reinforce the fact that is a one-dimensional plan which relies on private developers and a buoyant housing market to achieve its objectives. We believe this is short-sighted and irresponsible. There are already concerns, most recently expressed by the Chancellor of the Exchequer, that the economy is weakening. There is no guarantee that a further recession might not happen, especially given the situation with the EU. In our view the Local Authority has a responsibility to develop alternative strategies for Tottenham. If the economy goes into downturn, what commitment would these developers have to Tottenham and its communities?</p> <p>e) Part of developing alternative approaches would be to examine eventualities which might occur – in</p>	<p>new homes and jobs that the meet the borough’s needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough’s residents.</p> <p>It is considered that the plan meets objectively identified housing and employment needs across the borough. The densities shown as required to deliver the Plan are well within the GLA’s density matrix.</p>
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				<p>other words, to carry out a risk assessment. Relying on this plan, should there be an economic collapse, this would leave, in particular, Tottenham blighted, with many communities caught within red-lined zones.</p> <p>f) Haringey's proposal for a joint venture company comprising 50/50 ownership with a private development partner compounds the huge risk of this one-dimensional plan. The plan to transfer two estates to a private company is predicated on this local plan – they go hand in hand. This makes housing and development even more vulnerable to the market and leaves hundreds of tenants and residents exposed. This is discussed further in paragraph 7, section d, below.</p> <p>Is it flexible?</p> <p>The <i>Alterations</i> make the plan inflexible since it is one-dimensional as described above in paragraph d.</p> <p>a) Estates could be refurbished and alternative approaches could include a range of design options whereby additional homes could be created without demolitions. Building upwards or outwards from existing buildings, adding extra storeys or wings, are now well-tested strategies for this.</p> <p>b) There is nothing in the plan to say what will happen is the envisaged strategy (overall or for specific sites) cannot be achieved. We know from the Council's latest proposal for a Joint Venture Company approved by Cabinet in December that the Council plans to transfer to a Joint Venture Company much of its property portfolio including many sites in Wood Green and Northumberland Park which are the subject of specific Site Allocation Documents. Much will then depend on how the</p>		<p>The pattern of development that has been set out in the Local Plan has been subject to the statutorily required sequential test, and all sites have been included in a borough-wide SFRA. Additionally, upon development, all sites will be required to not increase the risk of flooding on the site, or elsewhere.</p> <p>The establishment of a joint venture housing delivery process is outside the scope of the Plan. Any such process will implement the policies included</p>
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				<p>market affects one particular private sector partner, the one which will be chosen as 50% owner of the Joint Venture Company. If this company should get badly into debt, or if it should decide to pull out of the arrangement because better profits are to be made elsewhere, the strategy for these sites could be in jeopardy.</p> <p>c) The Council is planning to rely too much on a single private sector partner, and too much on large private developers altogether. It would be less risky and more flexible to envisage for each site a community partner, such as a co-op, community land trust, or community investment fund drawing on the savings of the wealthier west-of-borough residents by selling them bonds. The Council could facilitate the development of several community partners of this kind. It could also engage small local builders for small parcels of building land or for refurbishment work. This would be more flexible than relying on the Joint Venture Company and would have greater prospects of local job creation. We note that in the case of the Hale Village, the collapse of the housing market in the late 'noughties' caused financial difficulties for the chosen private sector partner and whilst solutions can be found for a single site, this is rather more difficult where the same company is involved in several sites.</p> <p>d) Moreover, there is no flexibility envisaged in the event that publicizing plans which include demolition as an option should lead to a sharp decline in market values and 'lettability' in particular areas, notably Broadwater Farm and the surrounding area in SA62, and in Northumberland Park. Homes being left empty could lead to</p>	<p>in the Plan.</p> <p>All viable options for estate renewal will be considered on a site by site basis, having regard to the quality of the existing buildings.</p> <p>The strategic outcomes sought by the plan are subject to annual monitoring. Where an objective or target is not being met, the actions as set out in the monitoring schedule will be followed, and may include further alterations to the</p>
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				<p>dereliction and social problems (such as a ‘sink estate’ reputation, rubbish dumping and drug dealing), affecting the attractiveness and value of nearby private housing as well as the actual estates marked for demolition.</p> <p>e) Our over-riding concern is that refurbishment should always be considered as an option alternative to demolition.</p> <p>Will it be able to be monitored? We have concerns that the <i>Alterations</i> cannot all be properly monitored.</p> <p>a) The site allocation documents do not specify the number of affordable units envisaged for particular sites. Thus as agreements are reached with developers for particular sites, it will be impossible to say whether meeting targets for total units or affordable units are likely to be met taking into account the remaining sites. Table 2 (Broad distribution of new housing) on p. 35 of the <i>Alterations</i> says nothing about how much ‘affordable’ housing will be built on each main site. This is also the case in the Site Allocation DPD and in the Tottenham AAP.</p> <p>We would expect that at the least, targets for ‘affordable’ units should be supplied for the sites in the upper Lee Valley Housing Opportunity Area. We also note that it is not clear whether the ‘affordable’ percentage target of 40% is calculated as ‘new build affordable/total new build’ or ‘new build affordable/(total new build minus the number of social rent properties demolished or amalgamated into larger units)’.</p> <p>b) The ‘housing trajectory’ graph (Appendix 1, p. 58 of the <i>Alterations</i>) which states how many units will be built in each year does not say how many will be</p>		<p>Plan.</p> <p>The level of housing to be delivered and the pace of delivery means large private developers are necessary but the plan encourages housing by small developers and self build to help supply.</p> <p>A requirement of the Local Plan is to demonstrate that the Boroughs strategic needs can be met and delivered. This necessarily means allocating site for redevelopment.</p> <p>All viable options will continue to be considered on a site by site basis</p>
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				<p>affordable at each stage. This means that the 'affordable housing' proportion of the total cannot be monitored against the target year by year.</p> <p>4. Is the plan consistent with national policy? As stated above, the <i>Alterations</i> fail to demonstrate how they will meet a whole range of London Plan, national and local targets and policies – e.g. for necessary social infrastructure (e.g. health, education, open space, play and recreation, community facilities), for Lifetime Neighbourhoods, for climate change avoidance and mitigation, and so on).</p> <p>The <i>Alterations</i> fail to demonstrate how the Council will fulfil its obligations to protect and enhance local heritage and the character of the borough, in Tottenham in particular. The Planning Inspector for the Plan's predecessor, the Local Development Framework, made it crystal clear after extensive evidence and debate at the LDF Inquiry that Haringey's character is generally suburban.</p> <p>Equalities legislation: The effect of the <i>Alterations</i> would be an unacceptable attempt to enforce a 'top-down' social and physical re-engineering of large parts of Haringey to the detriment of current communities and of Haringey's character. National policy (the Equalities Act) would have regard for equality of opportunity for ethnic minority groups, but because of the strong association between ethnic minority origin and low income, the fact that the plan will 'dilute' and drive out the existing residents of Tottenham means that negative impacts will disproportionately affect ethnic minority people.</p> <p>Appendix C to the <i>Consultation on Haringey's Draft Housing Strategy 2015-2020</i> also</p>		<p>for estate renewal.</p> <p>The Plan specifies the number of affordable homes to be delivered over the plan period. On individual sites, optimum provision is based on a number of factors and requires site by site negotiation.</p> <p>The Plan is considered to be consistent with the NPPF and the latest version of the London Plan.</p> <p>The Council does not agree</p>
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				<p>demonstrates how the policy of knocking down council housing in order to increase home ownership through Shared Ownership would be discriminatory. It states: ‘Incomes in east and central Haringey have reduced between 2010 and 2012/13 whereas they have risen in west Haringey over the same period. Black households are represented more in the east of Haringey than they are in the west of the borough and conversely White households are represented more in the west of the borough, than in the east. Initial data on buyers of shared ownership homes show that Black and ethnic minority buyers are under-represented in new schemes whilst White buyers are overrepresented in comparison with their representation in the general population of Haringey...</p> <p>The above evidence indicates there is a possibility that over time Black residents in Haringey may not benefit from the plans to build more homes in the borough through promoting affordable home ownership in east Haringey. White households may benefit more easily.’</p> <p>We believe that replacing council housing with so-called Affordable Rent properties is also discriminatory, given the concentration of black people in the East of the Borough where household incomes tend to be around £20,000 a year. Such incomes clearly make so-called Affordable Rents of over £800 a month desperately unaffordable. £800 is over 45% of the gross income of the typical household in Northumberland Park and the East of the borough, let alone their net income (which is the GLA’s affordability criteria, see page 53 of <i>Appendix C</i>).</p> <p>We believe that the policy of demolishing council</p>		<p>that the local plan’s housing plan will disadvantage BME residents. The respondent refers to the EQiA that was carried out in relation to the Housing Strategy. The EQiA that was published with the draft Housing Strategy identified a cause of concern in the take up of one particular type of housing, which is Shared Ownership. Shared ownership (part-rent part-buy homes) consisted of around 135 units a year during the last two years, whilst social housing lets</p>
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				<p>estates therefore breaches the commitment in Haringey Council’s Equal Opportunities Policy of April 2012 to the fair provision of services.</p> <p>Paragraph 3.2.2 of Haringey’s Local Plan: Strategic Policies 2013-2026 states that: ‘The Council will seek to ensure that everyone has the opportunity to live in a decent home at a price they can afford and in a community where they want to live.’ In the light of the above it is clear that the Council proposal to demolish Northumberland Park is in breach of the Local Plan. It would only be non-discriminatory if there was a plan to re-provide the same quantity of social, rented housing with permanent secure tenancies and low rents similar to the rents currently charged to council tenants in Northumberland Park. Given that no such plan exists, the inclusion of council housing in Northumberland Park in the site allocations is discriminatory and improvements to existing homes rather than demolition should be substituted.</p> <p>We would also note council plans to house more homeless families outside London (see Haringey Council’s Corporate Plan, Medium Term Financial Strategy 2015/16 to 2017/18). (This was a report made to the Cabinet as part of agenda papers on 16/12/2014). Clearly demolishing social housing without appropriate replacement in areas like Northumberland Park will lead to increasing numbers of Haringey’s homeless families being forced out of London. This ‘social cleansing’ aspect, adds to the discriminatory nature of the proposal to demolish social housing. As Appendix C of the <i>Consultation on Haringey’ Draft Housing Strategy 2015-2020</i> states ‘Black households approach as homeless at a level which is more than twice their</p>		<p>over the last two years were around 600 a year. The findings related to the shared ownership take up, are not directly related to the issue of estate renewal. The Council is taking action to mitigate the imbalance of households who buy into shared ownership schemes, by undertaking further research and monitoring, and by ensuring that its marketing and sales are targeted at local households.</p> <p>The housing policy governing estate renewal, which has been the subject of extensive</p>
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					<p>representation in Haringey's population compared with White households who present in numbers which are around two thirds of their representation in Haringey's general population. This indicates that Black households are particularly affected by homelessness in the borough.' Therefore reducing the amount of social housing will make black households disproportionately likely to be forced to leave the borough and indeed London. This is additional evidence of the discriminatory nature of the Council's plan for Northumberland Park and Tottenham as a whole.</p>		<p>consultation between November 2015 and February 2016, and which is due to report back to Cabinet in July 2016. There will be a separate Equalities Impact Assessment published when that report is presented to Cabinet. The Local Plan has been subject to its own EQiA as part of the Sustainability Appraisal.</p>
3	RSP 22	Alt 47-50 and 52 - Policy SP2	Not stated	Not stated	<p>Berkeley Homes supports the reduction in the affordable housing target to 40% based on habitable rooms in accordance with the evidence of the Borough's latest viability assessment (Haringey Development Appraisals & Viability Testing, January 2015). It is critical to ensure that the provision of affordable housing does not harm the continual delivery of needed homes.</p> <p>Berkeley Homes also support the proposed housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing in line with the London Plan and consistent with the Strategic</p>	Not stated	Noted.

					<p>Housing Markey Assessment (SHMA) findings to deliver more balanced communities and to ensure scheme viability.</p> <p>The proposed amendments to Policy SP2 (8) which states the preferred affordable housing mix, in terms of unit size and types of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing needs at the time of any application is also supported.</p>		
13	RSP 44	Alt47 Alt49 & Alt50 SP2	Not stated	Not stated	<p>KA Investments supports the increased targets for new homes in Haringey set out in amended Strategic Policy SP2. KA Investment's notes that amended Policy SP2 seeks to reduce the level of affordable housing sought in schemes of 10 or more units, from 50% to 40% and alters the desired tenure split from 70% affordable rent / 30% intermediate rent to 60% affordable rent / 40% intermediate rent. KA Investments supports these proposed amendments as they reflect the tenure split advocated in the London Plan and further ensure that the delivery of affordable housing will not harm the overall delivery of housing.</p>	Not stated	Noted.
12	RSP 42	Alt48 SP2 (2)	Yes	Not stated	<p>We support the Council's amendment to replace "complies" with "is designed having regard to" in respect of Criterion 2 on the use of the housing design and space standards set out in the Mayor's Housing SPG (2012) and the London Plan, and the play space standards set out in the Mayor's Play and Informal Recreation SPG (2012).</p>		Noted.
25	RSP 65	Alt48 SP2 (2) Housi	Not stated	Not Stated	<p>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</p>	References to space standards should refer to those set out in the Mayor's emerging Minor	Noted. The text refers to the space standards set out in the

		ng Stand ards			<p>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.</p>	Alterations to the London Plan (MALP)	<p>London Plan – therefore, once the MALP is adopted, the Haringey Local Plan Policy SP2 will continue to be relevant and in conformity.</p> <p>SP2 (5) is also considered consistent with MALP standards for access M4(2) and wheelchair user dwellings M4(3) – although it is recognised that the terminology has changed and this part of the policy could be updated at a later stage to reflect this.</p> <p>No change</p>
12	RSP 43	Alt 49 SP2 (5)	No	Not stated	<p>We note that Criteria 5 and 6 have amended the affordable housing requirement, based on the viability assessment. The Council's evidence on viability assessment shows that the mixed use development on a site within Haringey Heartland/Wood Green is unviable if it were to</p>	<p>We therefore <i>object</i> to setting the borough-wide affordable housing target, and for Haringey Heartland/Wood Green the target should be</p>	<p>Affordable housing will be determined on a site by site basis, having regard to</p>

					provide 30% affordable housing provision. We consider that a lower percentage should be set for development in Haringey Heartland/Wood Green, on the basis of the Council's viability evidence , to ensure viability and deliverability of the sites allocated for redevelopment/regeneration.	lower than 30%.	viability of schemes. It is considered that overall, a 40% affordable housing target, on a habitable rooms basis, across the borough is deliverable. No change
9	RSP 31	Alt49	No	Not stated	<p>I believe that the plan is unsound on grounds of :-</p> <p>1) it is not the most appropriate strategy when considered against the alternatives</p> <p>2) therefore it is not effective</p> <p>I have issues about:-</p> <p>a) the low amount of affordable housing, the target should be re-set at least 50%</p> <p>b) the excessive reliance on a small number of powerful large private developers to get housing built,</p> <p>c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes</p> <p>d) the absence of attention to energy saving and local power generation</p>	<p>a) <u>The low amount of affordable housing</u></p> <p>Under SP2, the target should be re-set at least 50%, given that the strategic housing market assessment says that 58% of the local population cannot afford a rent as high as 80% of market levels and given the plan's own admission in para 1.3.1 that 59% of total net additional homes need to be 'affordable'. Otherwise a lot of current residents will have to move further away from central London, with</p>	<p>The maximum amount viable across the borough is 40% as demonstrated through the Viability Study which informs the Plan.</p> <p>It is not considered that the Local Plan discriminates against small developers, housing co-ops, refurbishment or infill developments. All of these methods will</p>

					<p>consequent difficulties for their employment and a higher demand on transport facilities as their jobs will not necessarily move with them.</p> <p>b) <u>The excessive reliance on a small number of powerful large private developers to get housing built</u></p> <p>The plan needs to be considered alongside the Council's adopted policy of working with Spurs as a major player, and its adopted proposal to set up a single joint venture company with 50% developer equity (and control) to which many sites in Wood Green and Northumberland Park will be transferred. This gives enormous bargaining power to these two private interests. Spurs have already negotiated away much of their s.106 contribution to the redevelopment of the</p>	<p>contribute to providing the affordable housing that the borough needs and specific policies encouraging these forms of development are provided for in the Development Management Policies DPD (see Policies DM14 & DM16).</p> <p>While the Council is beginning to create its own development capacity, it is recognised that this will not be sufficient to meet the needs identified. It is therefore essential that the Council works with the private sector to ensure that the</p>
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					<p>football ground area and have been given planning permission for two huge towers with no 'affordable' housing. There are huge risks attached to dependence on the market destiny of a handful of companies.</p> <p>The Council should be seeking to sub-divide sites to facilitate development proposals from smaller builders and from community led organisations (such as housing coops, community land trusts, or development trusts). It has 15 years to facilitate the development of the latter category, of which at least 3 already exist in Haringey.</p> <p>I am agnostic as to where would be the best place in the 'strategic policies' document to say this, but something is needed along the lines of:-</p> <p>' The Council will seek to</p>	<p>new homes and jobs that the meet the borough's needs are delivered. The Local Plan aims to ensure that private development is located in the correct place, well designed, and delivers positive outcomes for the borough's residents.</p> <p>Requiring sites to be sold in a certain way, or to be built a certain time after permission, is not within the scope of the Local Plan. The Planning Obligations SPD does provide a clawback mechanism that enables sites which have taken a number</p>
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					<p>diversify its array of development partners by encouraging community led development organisations such as housing coops and non-profit trusts to come forward, request sites and discuss proposals, and where appropriate will help them with formulation of proposals and searches for sources of finance pre-planning-application. It will also encourage smaller London-based building companies to put forward proposals for just part of a site defined in the Site Allocation Documents where this is likely to produce value for money and speedy use of the available land.</p> <p>The Council will not tolerate land being left undeveloped for more than xx months (xx = 10?) following the grant of planning permission. Once a s.106 contribution has been</p>	<p>of years to be delivered to be reassessed for affordable housing proportions when the sales values become known.</p> <p>Refurbishment is being carried out on a range of housing sites across the borough.</p> <p>The turnover of private rented properties is outside the scope of the Plan.</p> <p>The bringing forward of space above shops is already supported through the Plan</p> <p>The Government has already relaxed Permitted</p>
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					<p>agreed, planning permission may be revoked if this agreement is not adhered to and appropriate funds must be placed in an escrow account before building regulations approval can be finalised.</p> <p>The Council may require as a condition of planning permission that units should not be offered for sale 'off plan' except to RSLs or organisations offering to 'sell on' for shared ownership'.</p> <p>This last provision is to avoid off-plan sales which favour cash buyers, often foreign companies, at the expense of local owner occupiers. It would mean facilitating a 'bridging loan' arrangement by shared ownership providers so that someone who cannot get a mortgage until the building is completed</p>	<p>Development rights for rear extensions. The Council wishes to ensure through its planning policies that these do not negatively impact upon neighbours' amenity.</p> <p>There are policies governing the creation of new decentralised energy networks in the DMDPD.</p> <p>No change</p>
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						<p>can obtain a shared ownership deal to start off with and then buy out the rented share as soon as s/he can obtain a mortgage, maybe within months.</p> <p>Following the example of Islington Council, steps need to be taken against the 'buy to leave' practice. Therefore somewhere the policies should say something like:-</p> <p>'New homes should be occupied by a resident within 3 months of completion, otherwise the Council reserves the right, as a condition of planning permission, to nominate a suitable occupant or to require letting to a registered social landlord. Evidence of genuine residential occupancy, such as the name and workplace of the occupant, and records of use of electricity and water, may be required in cases</p>	
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						<p>of doubt.'</p> <p>Also in question should be use of new homes for 'air b and b' type lettings. Where permission is granted for a residential development, it should be considered a breach of that permission if hotel-type use, with more than say 8 different occupants in a year in the same dwelling, is subsequently discovered.</p> <p>c) the lack of consideration of alternative and flexible ways of delivering new and refurbished homes</p> <p>The plan is focussed on meeting the new homes target by building on large sites, often to excessive height especially around Tottenham Hale. Spontaneous action to expand the existing housing stock upwards or sideways is neglected</p>	
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						<p>unless it is envisaged in a brief mention of 'windfall sites' in para. 3.2. But expanding and making better use of existing buildings has considerable potential, for example by:-</p> <p>1) reducing the void rate of the housing stock. In particular this could be done by reducing turnover of private tenants. Typically private landlords are now letting for as little as 6 months at a time. When they do so the property may well be left empty for a week between lettings, so that extending the length of tenancy from 6 to 12 months would reduce the average void % of a number of private-rental dwellings at any one time from 1/26 to 1/52, that is from approximately 4% to approximately 2%. The Council should set up a low-profit municipal lettings agency to offer 12 month tenancies,</p>	
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						<p>setting a model and a competitive force in the market which would reduce the void rate and improve tenants' security. This could be included as an additional strategic policy, worded something like:-</p> <p>'The Council will seek to reduce the turnover in private lettings by working with landlords to achieve longer tenancies and thus reducing the proportion of properties empty at any one time due to tenant changeover, possibly by acting as intermediary between tenants and landlords to offer tenancies of 12 months or more '.</p> <p>2) encouraging owners and business tenants to make better use of flats above shops, which are often merely used for storage and in poor repair. For example, a policy could be:-</p>	
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						<p>'The Council will conduct surveys every 2-3 years of town centre and minor shopping parades to identify unused or under-used accommodation above shops and offices which could be brought or returned into residential use. It will work with owners to effect such re-use, through project-managing re-use, helping to identify contractors and suitable finance, finding tenants, and guaranteeing rents where appropriate. In some instances such premises could be made available to homeless families. '</p> <p>3) easier planning permission for owner occupiers to build ground floor extensions or full width dormer attic conversions, permitting larger homes for extended families to stay together. Owners could be encouraged by offering council tax</p>	
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						<p>concessions (no re-banding of the enlarged building for x years, or extension of the single-occupancy council tax concession for 1 or 2 years for a lone-dwelling owner who creates one or two habitable rooms for persons living with them as relatives or as lodgers in a family environment. This is not to encourage HMOs but rather for families to accommodate a young person who might otherwise have to move away (but often cannot now afford to) or to take in an aged parent, or a student or young migrant worker as a lodger. Many first floor flats (for example in my own street, Sirdar Road, N22) could be enlarged to accommodate a family with children, rather than just a couple, by addition of an attic conversion room.</p> <p>Following the lead of Zac Goldsmith's recent</p>	
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						<p>statement (http://www.standard.co.uk/news/mayor/zac-goldsmith-add-two-storeys-on-public-buildings-to-help-solve-london-housing-crisis-a3189821.html) , a large number of small sites for additional dwellings could be obtained by: -</p> <ul style="list-style-type: none"> - building an extra floor or two on top of single storey shops or other commercial premises - building over small car parks so that parking remains underneath residential buildings but is not the only use of the site - adding extra floors to public buildings - adding extra wings to existing blocks of flats, especially in the more spacious west of the borough and on medium-rise council estates some of which have ample land space 	
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						<p>around the blocks. Wherever there is a blank wall or a staircase at the end of a building, such additions might be possible.</p> <p>The plan could say:-</p> <p>'The Council will undertake a survey of potential small sites for housing development consisting of addition of extra floors or wings to existing buildings, whether commercial or residential, or building on stilts over car parks, with a target of xx (=100 per year ?) units to be built in these ways across the borough, and encourage existing owners or community-led development organisations to make use of the sites identified with a view to providing social rented accommodation</p> <p>Further potential for freeing up accommodation for</p>	
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						<p>people who really want to live in Haringey could be obtained by offering older people who want to move out of London, especially owner occupiers who are under-occupying 3 or 4 bedroom homes, logistic help to move. I have written a further paper on this topic which can be supplied if it is of interest.</p> <p>d) <u>the absence of attention to energy saving and local power generation:-</u></p> <p>The strategic policies are surprisingly silent on these issues, particularly given Haringey's recent attention to a 'green borough' strategy.</p> <p>They should include something along the lines of:</p> <p>'All developments over xx units should be expected to make a contribution to reducing</p>	
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						carbon emissions and averting fuel poverty, by such features as: solar panels, recycling of grey water or rainwater, thermally effective district heating systems, lighting in stairs and passages controlled by movement sensors.	
20	RSP 52	Alt49, 61,62, 63	Not stated	Not stated	We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%.	It should be increased to the maximum possible.	Evidence suggests that 40% affordable housing is the maximum amount possible. No change
2	RSP 17	Alt49 & Alt50 SP2	Not stated	Not stated	We note that the policy reduces a borough wide affordable housing requirement from 50% to 40% due to the Haringey Development Appraisals & Viability Testing January 2015, and would maintain that this borough wide target is tested through viability modelling for each application site. We note that the affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing is now proposed in line with the London Plan.	Not stated	Noted. Policy DM13 of the Development Management Policies DPD sets out the more detailed considerations for affordable housing provision on individual development sites, including development viability.

							No change
8	RSP 30	Alt50 SP2	No	No	<p>Haringey Council’s policy intention is to reduce the level of affordable housing on large sites to 60% instead of the current policy of 70% affordable rented.</p> <p>Having reviewed Haringey Council’s Evidence Base documents on housing I cannot find any evidence to support this policy change, which would be to the detriment of those in greatest housing need.</p> <p>The key parts for Affordable Housing of the National Planning Policy Framework (NPPF) are:</p> <ol style="list-style-type: none"> 1. Para 47(1) “local planning authorities should use their evidence base to ensure that the Local Plan meets the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing in the housing market area, ..” 2. Para 50(1) “ plan for a mix of housing based on ...market trends and the <i>needs of different groups</i> in the community..” 3. The NPPF states that affordable housing is “provided to eligible households whose needs are <i>not</i> met by the market”. 4. Affordable Rent is housing let to “households who <i>are eligible</i> for social rented housing.” 5. Affordable Rent is subject to rent controls that require a rent of <i>no more than</i> 80% of local market rent. <p>It is most important to note that the NPPF is clear that there must be a difference between market housing and affordable rented housing.</p> <p>Haringey Council’s original Housing Planning Policies were adopted before the current NPPF. The</p>	<p>I respectfully suggest that the adopted Haringey Local Plan Housing Policies for Affordable Housing should stand and the proposed policy to reduce the provision of Affordable Housing should be rejected. With clear evidence of a high need for Affordable Housing, including over 3,000 families in homeless temporary accommodation, and over 1,000 families shipped to temporary accommodation in places as far afield as Liverpool and Birmingham, this proposal for a reduction is not credible. I invite the Inspector to ask Haringey Council to produce Housing Policies for households whose needs are <i>not</i> met by the market and to produce a Local Plan which meets the <i>full</i>, objectively assessed</p>	<p>During the preparation of the Local Plan, a viability study was commissioned which indicated that achieving 50% affordable housing across the borough on deliverable sites was not viable.</p> <p>The Council is undertaking a range of methods to boost the production of affordable housing, and the Local Plan support these by enabling planning consent to be granted to projects which will deliver new affordable homes. This includes a range</p>

				<p>proposed Housing Planning Policies do not conform to the NPPF, despite the requirement to do so. Haringey Council has failed to objectively assess needs for Affordable Housing, and it has failed to assess the needs of families and disabled people in particular, as is required. As a consequence of having failed to assess the need for Affordable Housing</p> <p>Haringey Council has failed to ensure that its Local Plan meets the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing.</p> <p>Haringey Council’s evidence base documents demonstrate that land is available and that affordable housing is economically viable on <i>all</i> sites generating positive residual values (all housing development costs having been taken into account) of up to £14m.</p> <p>Haringey Council’s evidence base documents that consider the need for affordable housing are:</p> <ul style="list-style-type: none"> - LBH Strategic Housing Market Assessment May 2014 produced by commercial property valuers GVA Grimley Ltd. - Haringey Council Housing Needs Assessment June 2007 produced by Fordham Research Ltd. <p>Unfortunately, neither document is robust and credible for different reasons, which are set out below.</p> <p><u>Haringey Council Housing Needs Assessment June 2007 produced by Fordham Research Ltd.</u></p> <ul style="list-style-type: none"> - This report though dated June 2007 on the front 	<p>needs for <i>market and affordable</i> housing.</p>	<p>of infill developments, and private-led developments as well as housing estate renewal projects.</p> <p>The change to 60% affordable rent from 70% will improve viability on sites, and help to underpin delivery of renewal projects, thereby delivering new affordable homes. It is also consistent with the Further Alterations to the London Plan.</p> <p>The consultations undertaken in the preparation of the Plan have been held in accordance with</p>
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				<p>cover is detailed as 2005 in the left hand page header and it was clearly written in 2005. It seems that whoever decided to change the front cover failed to change the date in the left hand header inside the document which states 2005.</p> <ul style="list-style-type: none"> - This report does provide a detailed and <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing and it considers the <i>needs of different groups</i> but only for 2005 and it does so using different guidance that was current at the time. - Figure 10.1 (page 85) states that Haringey is a borough with a very high need for new Affordable Housing, considerably greater than for inner London as a whole and almost twice as high for outer London as a whole. This was clearly justifying the target for 70% of affordable housing to be for rent. Given Haringey's context of low levels of provision of Affordable Housing together with very high housing costs and very low incomes a very high need for new Affordable Housing was to be fully expected. Given the real increases in housing costs and decline in real median incomes it is only to be expected that the need for Affordable Housing in Haringey has increased in the last 10 years. - As the information in this report is well over 10 years old it cannot be robust or credible, and it certainly forms no basis for justifying a reduction in the provision of new rented Affordable Housing from 70% to 60%. <p><u>LBH Strategic Housing Market Assessment May 2014 produced by commercial property valuers GVA Grimley Ltd.</u></p> <ul style="list-style-type: none"> - This report relies very heavily on census data from 		<p>the Town and Country Planning Regulations, and the Council's Statement of Community Involvement.</p> <p>No change</p>
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				<p>2011 and it fails to consider the current guidance on Housing and Economic Development Needs Assessments in a number of respects. The Planning Practice guidance on methodology for assessing housing need requires that overcrowding and homelessness be considered as a key market signals, (the guidance signposts to government held homelessness statistics prepared by local authorities in quarterly P1E returns) but GVA simply assume homelessness as part of the housing waiting list.</p> <ul style="list-style-type: none"> - Some tables are referenced GVA but there is no indication of the source of the data. At least one table is referenced Haringey Housing Needs Survey 2013 but no trace of any such survey can be found. - Unfortunately this report does not provide a <i>full, objectively assessed needs for market and affordable</i> housing and it fails to consider the <i>needs of different groups</i> despite the availability of clear and concise guidance. The NPPF which has been in place since 2012, well before the report was written, is clear that a Local Plan shall meet the <i>full, objectively assessed needs for market and affordable</i> housing. - The current Planning Practice guidance has also been in place well before the report was published but does not seem to have been followed. - The housing market area has been incorrectly drawn, with Waltham Forest excluded from the housing market despite being the third most important place for net outward migration (figure 5). - The report in several places seems to fail to follow logic. Figure 41 fails to present CACI median incomes but confirms that CACI lower quartiles incomes are below £20,000 for over three quarters 		
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				<p>of households in the borough. Table 38 sets out buying a home on the open market is affordable to 60% of households with an income of between £20,000 and £25,000 paying a yearly mortgage of £21,864. This is clearly not coherent and even those households with an income of £25,000 would be left with a disposable income after housing costs of only £60 per week.</p> <ul style="list-style-type: none"> - The report appears to have several confusions about Welfare Reform and benefit caps. There is reference to a Housing Benefit cap of £500 per week for families on low incomes for families to rent privately. This is incorrect and there is a Housing Benefit to the level of the 30th percentile of local market rents, and an Overall Benefits Cap for families taking into account all their benefits (including Housing Benefit) of £500 which is being reduced shortly as part of the government changes to welfare policy. - The report conflates the need for affordable housing with affordable rent. Table 40 which purports to examine affordability is indicative of the confusion as affordable rent is shown to be unaffordable to 75% of households whilst buying a home on the open market is unaffordable to only 65% of households. Table 48 appears to do the same suggesting that buying a home on the open market is far more affordable than affordable rent. - Table 62 assumes that there are 1,597 vacant social/ affordable dwellings that can be brought back into use and that there are no dwellings to be demolished. Given the very small affordable housing stock in Haringey such a high vacant property rate figure must be questioned. Similarly Haringey Council has been publicising its plans to demolish 		
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				<p>large amounts of its council housing for some time so the figure, which is given as zero cannot be correct.</p> <p>The evidence base used by Haringey provides an indication of a high level of need for affordable housing. This is consistent with Office for National Statistics data and the very accessible data about Haringey on the London Poverty Profile website which shows that lower quartiles rents in Haringey are £1.257 for a two bedroom property and that such rents would demand 74% of lower quartile incomes.</p> <p>London's poverty profile (hyperlink edited for formatting reasons – see full response for address)</p> <p>The GVA report does demonstrate without doubt that Affordable Rent at 80% of market (mean and median) rents are not affordable to “households whose needs are <i>not met by the market</i>”. The Housing Policies within the Haringey Local Plan do not meet the <i>full</i>, objectively assessed needs for <i>market and affordable</i> housing, especially so in respect of the need for affordable housing. Simply calling a product affordable does not mean that it is affordable and the NPPF is clear that a Local Plan must address the needs of those whose housing needs cannot be met by the market. In those areas where there is little difference between social rents and market rents, e.g. North East, North West and Yorkshire & Humber, affordable rents of 80% market rent make sense, however that is clearly is not the case in areas where market rents are high, as they are inevitably unaffordable.</p>		
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					<p>My evidence invites the Inspector to reject the proposed changes to the Housing Policies in the Haringey Local Plan because they reduce the provision of Affordable Housing and those policies do not conform to the current NPPF. My evidence also invites the Inspector to reject the proposed changes to the Housing Policies as they are not in conformity with the London Plan policies for family housing or housing for people with disabilities.</p> <p>The Inspector may wish to note that Haringey Council's consultation process makes it far more difficult to make a comment than very many other LPAs</p>		
20	RSP 53	Alt50 and Alt59	Not stated	Not stated	<p>We disagree with the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). Based on the evidence we exposed in the previous section, it is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price range of low income families in Haringey. A truly affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low-income Haringey residents is social rented. 'Affordable' should not be defined as 80% of a market rent, which is unaffordable to the vast majority of Tottenham residents.</p>	<p>We therefore demand that a separate and clear percentage for social rented housing be set in the affordable housing provision target; 70% of that affordable housing target should be social rented housing.</p>	<p>This response relates to rent levels for affordable rented housing, which is an issue outside the scope of the Local Plan.</p> <p>Given the levels of subsidy available for "social rented" housing at the current time, it is not considered to be deliverable to seek this type of housing.</p>

							The tenure split seeks to maximise the provision of affordable housing. No change
10	RSP 32	Alt 53 & Alt64 Para 3.2.29	Not stated	Not stated	Haringey Housing Estate Renewal - there should be added a provision which will adopt a policy of providing equivalent property for leaseholders who are displaced in the estate or the area and to offer independently assessed market rates for the leases. Anything less would be unfair and unlawful.	Not specifically stated	The provisions for affected tenants and leaseholders on housing estate renewal sites in not an issue controlled by the Local Plan's policies. This is however set out in the Council's Housing Strategy and follows Housing Act requirements. No change
20	RSP 54	Alt53 and Alt64	Not stated	Not stated	We strongly disagree with the approach embedded in the rewording of Alt53 and Alt64 about housing estate 'renewal and improvement', for reasons explained at length in the previous section. See also the detailed response and comments we made in relation to housing estate renewal in the Tottenham AAP (in particular in relation to Northumberland	No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the	The Local Plan protects affordable housing on a floorspace basis on estate renewal, which

				<p>Park) and in the Site Allocation DPD. We support Haringey Council's objective as laid out in para. 3.2.2, Policy SP2 HOUSING that 'the council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of'. This key priority can only start to be met by embedding the following principles CLEARLY in the policies on housing estate renewal in the <i>Alterations</i> (Alt53 and Alt64):</p>	<p>existing residents as the drivers of all the decision-making related to their homes.</p> <p>Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</p> <p>There should be absolutely NO NET LOSS of social housing units and no displacement of existing tenants as part of any plan for an estate. The proposed wording 'reprovide the same amount of social housing on an equivalent floorspace basis' does not guarantee those principles, and should be rephrased.</p> <p>There should be no demolition of structurally sound homes.</p>	<p>is considered the most appropriate method in ensuring housing need is met in full. Regarding consultation, and how developments take place, this will be controlled not by the Local Plan but by the Council's housing investment strategy and the requirements of the Housing Act, including s105.</p> <p>It is important to note that while structurally sound homes should be reconditioned/ redeveloped, it may be appropriate in some instances that structurally</p>
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							sound homes are replaced with a greater number of homes which better meet the borough's housing need. No change
27	RSP 70	Alt53 and Alt64	Not stated	Not stated	It is noted that the Council are bring forward a programme to improve and renew its own housing estates, in order to improving their quality and numbers of homes. Priority is given to estates that are within wider regeneration proposals (Policy SP2 Housing, and paragraph 3.2.29). We would seek assurances that as part of the process of designing and implementing change, that the potential heritage interest of each estate is fully identified, understood, and used (where recognised) in line with the principles of sustainable development. As an aid to ensuring the process of renewal is delivered effectively we would encourage the Council to work collaboratively with Historic England in identifying any potential heritage interest.	Not specifically stated	Agreed. A further paragraph could be added to Alt64 (after the second paragraph) which clarifies that the consideration of potential redevelopment options for individual renewal estates should have regard to the potential heritage interest of the estate (Historic England can assist with identify this) and to existing

							social and community facilities that support the existing community.
1	RSP 5	Alt 54 3.2.4	Not stated	Not stated	Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target. Please refer to the accompanying cover letter (part (c) bullet 5).	Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target. This will ensure the effectiveness of the plan meaning that it can be properly monitored against strategic targets.	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet and exceed its strategic housing requirement of 19,802 homes. The Council does not consider that the suggested change within text adds any clarity to the Plan. No change
1	RSP 12	Alt 54	Not stated	Not stated	Alteration 54, Section 3.2, paragraph 3.2.4 should clarify that the Haringey target set out in the London Plan is a minimum target.	As per response form	Policy SP1 sets out that the Council will maximise the supply of additional housing to meet

							and exceed its strategic housing requirement of 19,802 homes. The Council does not consider that the suggested change within text adds any clarity to the Plan. No change
3	RSP 23	Alt 56 - paragraph 3.27	No	Not stated	It is considered that this policy is not consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density, (which is simply a mathematical calculation) but of the quality of the proposed development overall and the place it will create in its context.	An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space. Policy SP2 should be amended to reflect this.	The policy is in line with London Plan policy. Policy DM11 in the Development Management Policies provides further amplification, including that alongside SP2 the optimum housing potential of a site is to be determined through a rigorous design-led approach.

							No change
2	RSP 18	Alt56 SP2 Para 3.2.7	Not stated	Not stated	Now includes reference to the Haringey Urban Characterisation Study (2014). The evidence base for the Local Plan refers to a 2015 document. The Study provides useful urban design analysis, but will ultimately be superseded, in part, by the Wood Green AAP, and therefore we question the appropriateness of the reference. The 2015 document is also out of date in terms of its reference to Clarendon Gas Works.	As per response form	The UCS is an evidence document which supports Local Plan preparation. Correction the alteration to refer to 2015 for the UCS.
11	RSP 37	Para 3.2.9	Not stated	Not stated	Paragraph 3.2.9 refers to Building for Life. This design guide has been replaced by Building for Life 12. The local plan should be amended to reflect this. BfL12 cannot be applied proscriptively by the Council. It is a voluntary scheme.	Not specifically stated	This paragraph is not proposed for amendment in the Local Plan, and as such is not the subject matter of the Examination. The Government is clear that extant policies can remain.
11	RSP 34	Para 3.2.13	Not stated	Not stated	In paragraph 3.2.13 the council refers to the Lifetimes Homes Standard. The Lifetime Homes Standard is now defunct as a standard. It is no longer one the Government recognises following its housing standard review. The council should update this policy and section of the local plan to reflect the new London Plan which includes the minor alterations of the London Plan in	Not specifically stated	This paragraph is not proposed for amendment in the Local Plan, and as such is not the subject matter of the Examination.

					<p>the minor alterations to the London Plan the Mayor has stimulated that 90% of new homes provided should be built to the Part M 4 (2) adaptable and accessible homes standard and 10% should be built to Part M 4 (3) which is the wheelchair accessible homes standard. Lastly, the 10% for Part M4 (3) should only be applied to the affordable housing element.</p> <p>The Council should amend its plan accordingly to reflect the new minor alterations to the London Plan.</p> <p>The Council should also be aware of the minor alterations to the London Plan and its recognition that the ability to build homes for the wheelchair home standard i.e. part M for 3 does represent a challenging term of liability therefore the Council should apply the policy flexibly and keep it under review in case it has an advert effect on mobility.</p>		<p>The Government is clear that extant policies can remain. Nevertheless, the London Plan alterations have picked this matter up and its new London Plan policies supersede those of the Local Plan.</p> <p>No change</p>
11	RSP 35	Para 3.2.14	No	Not stated	<p>Paragraph 3.2.14 is unjustified and the Council cannot seek a more aspirational target of 20% wheelchair acceptable homes. If it wanted to have a target of 20% wheelchair acceptable home it would need to undertake the necessary evidence gathering and liability assessment to demonstrate that is viable and is required.</p>	Not specifically stated	<p>This paragraph is not proposed for amendment in the Local Plan, and as such is not the subject matter of the Examination. The Government is clear that extant policies can remain.</p>
7	RSP 29	Para 3.2.18	No	Not stated	<p>States that the Council “aims to ensure an adequate mix of dwellings is provided” but there is no detail as to how this will be achieved, especially with</p>	Not specifically stated	<p>This paragraph was not subject to alterations,</p>

					<p>regard to social housing for families. The proposals for new developments are primarily for high density flats including many very tall buildings. These are likely to be overwhelmingly one and two bedroom flats so the densities can be achieved and costs covered. (See Tottenham AAP) Given the extensive need in Haringey for social housing for families how can this approach be described as a ‘strategy which seeks to meet objectively assessed requirements?’</p> <p>The Council says responding to family housing need is ‘a priority for the Council’, so the question is, will this plan address this in making provision of family housing for people living here?</p>		<p>and therefore the suggested changes are out of scope.</p> <p>However, the Local Plan, in addition to proposing new housing, also seeks to protect existing family housing, as well as providing a mix of units, including family units. Further detail is set out within the policies of the Development Management Policies DPD.</p> <p>No change.</p>
11	RSP 36	Alt59 Para 3.2.19	No	Not stated	<p>We note paragraph 3.2.19 of the draft local plan. This specifies a strategic tenure split of 60% affordable rent including social rent and 40% intermediate. Firstly, a tenure split of 60% affordable rent including social rent is ambiguous. The council will need to reflect the outcomes of its local plan viability study and what has been assumed in the modelling for affordable rent and social rent since these are not the same thing. Social rented dwellings will tend to be more</p>	Not specifically stated	<p>It is not clear how this is ambiguous. The policy accords with the London Plan, and is further amplified by Policy DM13 of the Development</p>

					<p>expensive to provide because it is a tenure that requires a higher level of subsidy because the rental income is weaker.</p> <p>Secondly, it is also unclear what the applicant is expected to provide in terms of the rented element of the tenure. The local plan should not be ambiguous about this. It should provide clarity to enable applicants to be able to advance applications with a clear knowledge of what is expected by the local plan. Equally, the decision-taker should know from the local plan how s/he is to determine application. This part of the local plan is ambiguous and contrary to national policy on the need for clarity in local plans. . The local plan will need to be amended to clarify how many homes are to be provided as affordable rent and how many as social rent.</p> <p>The Council should also take into account the forthcoming requirement of the housing and planning bill. This will include starter homes within the definition of affordable housing the Council should amend the plan to make it clear that starter homes can be provided as a form of affordable housing.</p>		<p>Management Policies DPD.</p> <p>No change</p>
1	RSP 6	Alt 61 3.2.22	Not stated	Not stated	<p>Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “subject to viability” inserted at the start of the paragraph. Please refer to the accompanying cover letter (part (c) bullet 6).</p>	<p>Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “subject to viability” inserted at the start of the paragraph.</p>	<p>The suggested addition adds nothing to the Plan. Policy DM13 of the Development Management Policies DPD</p>

							sets out the more detailed considerations for affordable housing provision, including development viability. No change
1	RSP 13	Alt 61	Not stated	Not stated	Alteration 61, Section 3.2, paragraph 3.2.22 should be amended to reflect Policy SP2 with the words “ <i>subject to viability</i> ” inserted at the start of the paragraph.	As per response form	The suggested addition adds nothing to the Plan. Policy DM13 of the Development Management Policies DPD sets out the more detailed considerations for affordable housing provision, including development viability. No change
6	RSP 28	Alt 64 Section 3.2 para 3.2.29	No	No	Highgate Neighbourhood Forum consider the alterations to SP2 suggested at Alt64 (Haringey’s Housing Estate Renewal) to be unlawful and unsound. The reasons for this are summarised as:	The new policy, which replaces ‘improving the quality of existing social housing’ with ‘increasing housing provision’ as the	The 2015 consultation document included “The building of

				<p>- The policy is unlawful because it has not been prepared in accordance with the LPA's statement of Community Involvement.</p> <p>- The Policy is not justified because it has not been prepared with the participation of the local community and others having a stake in the area.</p> <p>The Policy has not been prepared in accordance with Haringey's Statement of Community Involvement</p> <p>Alt 64 has been completely rewritten following the 'preferred options' consultation (Jan 2015), ostensibly in response to representations made during the consultation. In effect this is a completely new policy paragraph, which abandons the principle of estate regeneration and replaces it with 'estate renewal'.</p> <p>The previous version the policy expressed that 'the driver for estate renewal is to improve the quality of the existing social housing stock' (my emphasis). The new version is instead motivated by the need to 'meet housing need', 'provide greater housing choice' and 'cross-subsidise the costs of modernising the existing housing stock'.</p> <p>This is the first time that stakeholders and the local community have been consulted on the inclusion of a policy that allows councils to 'renew' housing estates, even if the estates/housing units themselves are not in need of renewal or regeneration. It is the first time that a policy has included the idea of 'cross subsidy' and the capitalisation of council-owned assets.</p>	<p>driver for estate regeneration/renewal should be removed. Policy wording should make it clear that demolition and re-provision of social housing and social housing estates will only take place when there is an overriding need for the estate/and or housing to be regenerated or renewed.</p> <p>If the council wishes to include this new policy of estate renewal in the Strategic Policies DPD, the policy should first be subject to a full consultation in accordance with the SCI.</p> <p>The new policy paragraph introducing the idea of infill on council owned lane should be deleted. This is a new policy of 'infill', does not belong in estate regeneration or renewal and has not been consulted upon in</p>	<p>higher density mixed tenure developments, which increase the quality and range of the affordable housing options for local people..." This is in response to the issues of replacing affordable housing being financially difficult. Infill is one option in the delivery of these much needed new affordable homes.</p> <p>As such this is not considered to be a new policy, rather a clarification of the initially proposed position.</p> <p>No change</p>
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				<p>The policy alteration also proposes to include a new paragraph (in effect a new strategic policy) to justify the use of council owned land for ‘infill development’. This policy does not include a commitment to build new social or even ‘affordable’ housing on these council owned sites, but simply includes a provision for <i>low cost home ownership</i>. <i>This term is not defined in the plan and its use is misleading and confusing.</i></p> <p>We consider that this proposed alteration does not take into account the views of respondents to the previous consultation and seeks to introduce a new strategic policy, which has not been subject to the full (‘preferred options) consultation. We therefore consider this alteration to be counter to the SCI and therefore to be unlawful and the document legally non-compliant.</p> <p>The Policy has not been prepared with the participation of the local community and others having a stake in the area.</p> <p>For the reasons detailed above we also consider the document to be unsound, in that Alt 64 of the strategic policies has not been prepared with the participation of the local community.</p>	accordance with the SCI.	
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Section 3, SP3: Provision of land for gypsies and travellers (Alt 66)

No comments received

Section 3, SP4: Working Towards a Low Carbon Haringey (No Alteration)

ID	Rep	Alteration	Sound	Legally	Reason	Change Sought	Council’s Comments /
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	ID			Compliant			Response
14	RSP45	SP4	No	Not stated	The green link as a "very distinctive sign" of the redevelopment which needs to be in a straight line and have a bridge over the railroad must be an idea that came up at the pub. Let's use those money for something more concrete and let's improve the access to the Lea Valley at the north side of Down Lane Park which is a place we are scared to go in the evening instead!!!	Forget the Green Link and make many green links using Down Lane Park as the natural bridge between the High Road and Lea Valley. Improve all the communication links between the park and the High Road especially the entrance to the Lea Valley Park from Park View Road	This section of the Local Plan was not subject to proposed alterations. The representation is therefore beyond the scope of the current consultation. Nevertheless, the Council supports improving both links.

Section 4, SP6: Waste and recycling (Alt67-69)

No comments received

Section 5, SP8: Employment (Alt70-79 and 110)

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	RSP 46	Alt70 SP 8	No	Not stated	Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&R is a	Having regard to the above, we consider that the reference to ' ...and other non-designated employment sites ' in the first paragraph of the policy	Ultimately it will be important that both designated and non-designated sites contribute to meeting Haringey's jobs need/target . Removing this aspiration is harmful to achieving the jobs target for the

				<p>therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.</p> <p>Policy SP8 has been altered in the pre submission draft from that in the preferred options version to extend protection under the terms of the policy to ‘other non-designated employment sites’ as well as Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas. We object to the extension of the policy in this way. The same level of protection should not apply to all employment sites within the Borough. Under the heading building a strong, competitive economy, paragraph 21 of the National Planning Policy Framework (NPPF) indicates that investment in business should not be overburdened by the combined requirements of policy expectations. It is noted that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Paragraph 22 notes that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purposes and that alternative use of land and buildings should be treated on their merits having regard to market signals and the relative need for different land uses.</p> <p>In our view, the focus of the policy should be on the most important employment sites as set out within the existing policy with a more flexible approach allowed for non-designated employment sites having regard to market signals and relative</p>	<p>should be deleted.</p>	<p>Borough.</p> <p>It is noted that The Mall, while containing some employment floorspace, is predominantly retail, with residential above, and as such the effect of SP8 on this site will be limited.</p> <p>No change</p>
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					<p>need for different land uses. It appears that the inclusion of other non-designated employment sites has been added to the policy as a 'catch all', since there is no expansion within the remainder of the policy or supporting text as to the Council's approach to other non-designated sites.</p> <p>We therefore consider that the addition of the text is unsound by reason of being unjustified and contrary to national planning policy guidance.</p>		
20	RSP 55	SP8 Alt70	Not stated	Not stated	<p>In March 2015, in our response (no. 818) to the public consultation on the <i>Alterations to Strategic Policies 2011-2016 (version February 2015)</i>, we made detailed comments with regard to the sections and policies which concerned employment land. We challenged the evidence base upon which changes to these were made. We wish to reiterate these comments here and argue that the alterations proposed under policy SP8 are not sound because they are not positively prepared or justified. The alterations are based on the <i>Haringey Employment Land Study</i> update which was released to the public in February 2015 (available here: http://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_employment_land_study_-_final_feb_2015_0.pdf). We have identified a range of serious concerns about the <i>Haringey Employment Land Study</i> update which we believe need to be addressed before any Alterations to the Strategic Policies are made, and which seriously challenge its reliability as a source of evidence informing the present <i>Alterations</i>:</p> <ul style="list-style-type: none"> o The study displays a lack of understanding of the characteristics and strengths of the existing 	Not specifically stated	The Employment Land Review is a robust evidence base, prepared in accordance with national guidance and best practice.

				<p>economy, in particular the activities underway within industrial land and high streets. Work from CASS Cities from Mark Brearley, Jane Clossick and their students is insightful here (see their separate submissions in the March 2015 public consultation), as well as the survey of industrial estates (<i>From Around Here</i>) undertaken by Gort Scott architects and funded by Haringey Council and the GLA, here http://www.gortscott.com/media/uploads/639-final-3.pdf.</p> <ul style="list-style-type: none"> o A detailed survey of existing businesses (quantitative and qualitative) should be undertaken (see those undertaken by the LLDC in support of their local plan). Existing businesses, business groups and community groups have not been consulted or included within the stakeholder consultation conducted to inform this study. This makes it invalid and it should be repeated with a wider involvement of relevant local actors rather than just commercial developers and real estate actors, whose measure of success tends to be increases in rent rather than the broader concerns of Haringey Council and local communities. <p>For example, the section on ‘vacant floorspace’ starting on page 34 implies that new workspaces are inherently more attractive than existing (“second hand”) premises. This is not the case and is indicative of the dominance of a developer/investor rather than business/tenant perspective within the employment land study.</p> <ul style="list-style-type: none"> o Maps should be included. o The study acknowledges that the market for offices in Haringey is weak (as it does not compete with the central London market) while the market 		<p>A map is included at the rear of the ELR</p> <p>Haringey needs to make more intensive use of its existing employment land for future employment provision. While there may be demand for additional B8 uses, additional B8 use in a Haringey context is considered to be an</p>
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				<p>for industrial space is generally strong, with particular demand for space for flexible premises for SMEs. Yet the study seems to project a replacement of the strong industrial market with the weak office market, by loosing industrial floorspace to higher density office and mixed use developments. This seems very contrary to the evidence presented and potentially very damaging to Tottenham's economy.</p> <p>o The study acknowledges strong demand for industrial floorspace, and good occupancy rates on all estates, and yet still ends up recommending the relaxation of the status of some industrial areas to 'Regeneration Areas' to facilitate the delivery of the Council's housing and regeneration aims. The study is not considering how a failure to protect this workspace will impact on the Council's economic development aims. For instance, there is a lack of awareness about the role of existing workspaces in facilitating a growth in SMEs, green industries and social enterprises, despite these being stated aims of the Council's 2020 economic development and carbon reduction strategies. The study conveys no sense of the vision for the local economy.</p> <p>The study acknowledges that new commercial floorspace development often results in a net loss of employment floorspace due to the removal of existing floorspace (para 8.10 and paras 5.136-5.138). This finding does not seem to be dealt with at all in the plans policies. The loss of well functioning and valued employment land to make way for contentious major developments that displace existing residents and businesses (e.g. High Road West, Spurs Stadium, Wards Corner) is</p>		<p>inefficient use of land. Nevertheless, Haringey does not have land to accommodate new B8 provision. Office demand in the borough is growing as a result of the office to residential permitted development driving firms out from more central London locations. While currently not a recongised office provider, Haringey has all the pre-conditions to grow a strong office market, especially its connectively to the rest of London and beyond.</p> <p>The permitted development right has not affected Haringey as much as other more central London Boroughs, mainly because Haringey has such a small supply compared with other boroughs and the demand is relatively</p>
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				<p>a major concern and has not been considered at all within the various planning documents. Business displacement should be studied in detail as part of a new economic evidence base for the plan. It is particularly important to address this issue within the Tottenham AAPs.</p> <ul style="list-style-type: none"> o There is no consideration of: <ul style="list-style-type: none"> The impact of the relaxation of permitted development rights on the supply of employment space (the study explicitly says this has not been taken into account). As this change is likely to remove a lot of employment land from Haringey, not considering this makes the plan unsound. The impact of the loss of industrial land across London making the employment land sites in Haringey and particularly Tottenham more attractive. The Tottenham Opportunity Investment Fund is based precisely on this understanding. The plan needs to take this into account also to be sound. How different land uses relate to and rely upon each other. E.g. office / industrial /retail in and around high streets and town centres. There is no consideration of the links between retail and industrial land – the studies are entirely separate. <p>Without prejudice to our broader concerns, we are also concerned that some of the recommendations of the updated <i>Haringey Employment Land Study</i> have not been carried through into policy. New policies should be added to carry through the following recommendations:</p> <ul style="list-style-type: none"> o Para 7.19 says that ‘Any release of surplus employment land should not be to the detriment of successful B2 and B8 businesses... any B2/B8 		<p>stable and comparable to residential in parts of the borough such as Tottenham Hale.</p> <p>It is the role of the Strategic Policies DPD to bring the findings of these different studies together and ensure they result in synergies or potential conflicts are managed.</p> <p>Successful industrial land sites are protected for industrial use in the Plan.</p> <p>The relocation of businesses is desirable but is ultimately a commercial decision of the landowner and/or operator.</p> <p>Work has been undertaken on Workspace Viability to</p>
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					<p>businesses that are affected by the loss of employment land should be relocated to suitable premises so that viable industrial and warehousing businesses are not adversely affected’ (p.48). This is also explicitly specifically mentioned in relation to High Road West at para 5.57 yet no mention of this commitment is included in the Tottenham AAPs. A policy should be added to set this out, and to commit to properly compensating firms. However, due to pressure on industrial land, it will be hard to find suitable alternative sites within London.</p> <p>o The <i>Haringey Employment Land Study</i> update recommends that guidance is provided on how B-class floorspace should be provided within mixed use schemes. This guidance does not exist elsewhere and should be provided. This is an untested approach and requires guidance.</p>		<p>determine the type of new floorspace to be provided. This is taken forward in the Development Management Policies DPD</p> <p>No change</p>
20	RSP 56	Alt71	Not Stated	Not Stated	<p>We strongly disagree with proposed amendment Alt71 which decreases the forecast demand of new industrial workspace (B use classes) from 137,000 sqm to 23,000 sqm (which is even lower than the 32,000 sqm mentioned in the February 2015 version of the <i>Alterations</i>). While the amendment has come from the update of the <i>Haringey Employment Land Study</i> (para. 7.11), we have identified a range of serious concerns about that study (see above). It seems entirely counterproductive to reduce ambition for new employment floorspace at a time when Tottenham’s population and economy is projected to grow so rapidly. This proposed amendment should be withdrawn pending a new full review of Tottenham’s industrial land.</p>	Not specifically stated	<p>This is based on the findings of the Employment Land Review and is therefore supported by robust evidence.</p> <p>No change</p>
20	RSP	Alt72	Not	Not stated	We strongly disagree with proposed amendment	Not specifically	The change in

	57		stated	<p>Alt72, which foresees the proposed downgrading of the employment land status of Crusader Industrial Estate N15; High Road West N17; part of Vale Road/Tewksbury Road N15. The <i>Haringey Employment Land Study</i> describes these sites as well occupied and well performing in its description of individual industrial sites from p. 23 onwards:</p> <ul style="list-style-type: none"> - Crusader Industrial Estate is the site of Haringey Council's investment in fashion and textiles; both sectors requiring industrial workspace. [Elsewhere, it is mentioned that 'some industrial estates are at risk of being converted to alternative uses. This is evidenced with Crusader Industrial Premises not providing leases of more than 5 years, which indicates that the landowner may have other intentions for the site's future use' (p.18). Retaining this site as employment space will therefore require strong planning policy protection to prevent owners driving out existing uses and preventing investment through the use of short term leases.] - High Road West is described as 'well occupied and is therefore serving the needs of local businesses' (p. 27). - Vale Road/Tewksbury Road is the site of unplanned warehouse conversion as well as 'significant swathes of the site are still in active employment use however and should be protected for ongoing employment use' (p.30). <p>If the protections of these sites are removed, it is likely that their functions will be damaged through housing and mixed use development. There is a strong need for industrial land in London, and these well performing areas should continue to be</p>	stated	<p>categorisation of the mentioned employment land is based on the findings of the Employment Land Review and is therefore supported by robust evidence.</p> <p>No change</p>
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					protected as required by the London Plan. The Council risks its aspirations for regeneration damaging the strengths of its existing local economy – these strengths are acknowledged in regeneration and economic development strategies but not in its planning policies. All of the strengths mentioned in the Opportunity Investment Fund for Tottenham Factsheet (http://www.haringey.gov.uk/sites/haringeygovuk/files/hc_25783_opportunity_investment_fund_v3_web.pdf), for instance, require industrial workspace which the Strategic Policies do not sufficiently protect: ‘artisan bakers, craft breweries, gourmet popcorn manufacturers, royal uniform makers and high end furniture makers’ (Tottenham Opportunity Investment Fund factsheet).		
20	RSP 58	Alt77	Not stated	Not stated	Alt77: the proposed amendment to para. 5.1.18 introduces updated jobs targets for Haringey, introduced by the Further Alterations to the London Plan, which forecast 22,000 new jobs between 2011 and 2036, which would give the highest employment growth rate of all London boroughs. Steve Kelly from Haringey Council himself said these growth rates could not be delivered in its response to the consultation on the FALP (https://www.london.gov.uk/sites/default/files/027LBHaringeyResponse.pdf). The <i>Haringey Employment Land Study</i> says that this scenario ‘would result in levels of B use class employment growth that Haringey has not witnessed in the past two decades and would result in significant additional employment land requirements that would be difficult to provide for given the limited availability of sites and the Borough’ housing and	Not specifically stated	The jobs target is ambitious but all efforts should be made to achieve this target to ensure sustainable communities are delivered through the Plan that includes both an increase in housing as well as employment provision. No change

					regeneration policies' (p. 49). The Study recommends that Haringey therefore does not plan on the basis of the FALP employment projections, but the much lower trend-based projections. This quote also confirms the view that Haringey's – and Tottenham's specifically – supply of industrial land is being sacrificed to deliver its housing and regeneration priorities. This will have severe impacts on the nature and character of Tottenham for years to come, weakening the prospects for sustainable and inclusive development that actually benefits local people and local businesses.		
20	RSP 59	Alt78	Not stated	Not stated	Proposed amendment Alt 78 (para. 5.1.23) makes reference to a stakeholder consultation done as part of the <i>Haringey Employment Land Study</i> . The study should list who was included in this consultation. We do not believe existing businesses were part of this consultation. Policies in support of workspace for SMEs should not just engage real estate and commercial developers in considering how to deliver new affordable workspace but also engage existing businesses and business groups about what their needs are and how existing low cost workspaces can be retained and supported. Alt 78 should confirm how existing businesses and businesses have been consulted and what the council's policies are in relation to existing low cost workspace.	Not specifically stated	The Employment Land review clearly states that the consultation was undertaken with local agents who have a detailed knowledge of the local employment market and local conditions. Local businesses have been engaged in the Plan-making process through either their requested to be included on the LDF database, through representation by trade bodies, or by direct notification if directly affected by a site allocation.

							No change
3	RSP 24	Alt 70, 71 and 73 – Policy SP8	Not stated	Not stated	<p>This policy should be amended to give consideration to the individual circumstances of a site when deciding what protection should be offered to non-designated employment sites. Para 8.16 and 8.17 of Atkins Employment Land Study (2015) states (with our emphasis added) “Ensuring a supply of good quality, well located employment sites is maintained will help to support investment by existing and new businesses and growth in the local business base. Demand is likely to continue to be driven by small and medium sized businesses, primarily operating in B1 sectors. The trend-based forecasts suggest further decline in industrial and warehousing employment which is expected to result in some surplus employment land over the period to 2031. It is important that any surplus land is either re-used to meet B1a/b needs or released to other uses to contribute to Haringey’s housing and regeneration objectives. At the same time, it will be important that fit-for-purpose, well occupied B2 and B8 sites that serve the needs of local businesses are safeguarded so that Haringey maintains a diverse range of business activities and employment opportunities.”</p> <p>“The NPPF requires local authorities to be responsive to market signals to ensure that there is adequate provision of the right type of employment land to meet the needs of the business community. At the same time, there is little benefit in safeguarding employment sites that are not fit-for-purpose and could be used to relieve the Borough’s housing and regeneration pressures.”</p> <p>The release of an employment site for an</p>	As per response form	<p>The quantum of space available in the borough has fed into the Employment Land Study, which has in turn informed the policy position in the Plan. It is considered that this is appropriate in delivering an evidenced Local Plan. The policies included in this plan enable an appropriate approach to managing urban renewal on industrial sites in appropriate locations.</p> <p>No change</p>

					alternative use can lead to the regeneration of an area through the introduction of new investment. The potential for a site to be released from employment use should also be considered in relation to site location and circumstances, and the quantum of employment space that is generally available in the borough.		
3	RSP 25	Alt 76 - para 5.1.14	Not stated	Not stated	The proposed Alterations 70, 71 and 73 discussed above would seem to be in conflict with the Councils proposed amendment to paragraph 5.1.14 which seeks a more proactive and positive approach to planning for economic development.	Draft paragraph 5.1.14 says that <i>'it will be important for a flexible approach to economic development to be taken on Local Employment Areas by not placing significant restrictions on carefully managing the type of employment use that is permitted on allocated sites'</i> . This would imply some flexibility for none employment uses to be	Local Employment Area: Regeneration Area designations are the sites suitable for a mix of employment and non-employment uses. The employment offers/use of these sites is still a principle consideration. No change

						accommodated in defined employment areas and it is suggested that the same flexibility be applied to other non-designated employment sites as a minimum.	
2	RSP 19	SP8 Alt73	Not stated	Not stated	We note that Wood Green Local Employment Area is a Regeneration Area which is the most flexible of the categories as it can include mixed use development such as small scale “walk to” retail, community and residential uses. This is supported.	Not stated	Noted.
2	RSP 20	SP8 Para 5.1.18 Alt77	Not stated	Not stated	We note that the London Plan (2015) sets out revised employment projections for Haringey. The London Plan forecasts 12,000 additional jobs in the Borough over the period 2011 – 2026. Over the period 2011 – 2036, it forecasts an additional 22,000 jobs in Haringey. This represents a 29.5% increase in jobs. St William aims to meet sustainable economic needs where it develops and considers Clarendon Gas Works a site where it can assist Haringey Council in contributing to its London Plan objectives.	Not stated	Noted.
16	RSP 47	SP8 Alt110	Yes	Not stated	Our client is encouraged by draft Policy SP8’s recognition that Local Employment Areas require a more flexible approach to the uses within them, due to the characteristics of individual sites and their surrounding area. In particular, there is a clear identified need to provide the most flexibility to	Not stated	Noted.

					defined Regeneration Areas. This is to ensure that a key objective of the Local Plan, urban renewal, is achieved. The inclusion of “Tottenham Hale, (Part SIL/RA), N17” as one of the defined Local Employment Areas, classified as a Regeneration Area, is supported. It is considered justified, effective and consistent with national policy.		
17	RSP 48	Alt110	Not stated	Not stated	The Authority notes that the document uses the term ‘ <i>Friern Barnet Sewage Works</i> ’ at Alteration 110, paragraph 5.1 when referring to the ‘ <i>Pinkham Way</i> ’ site. ‘ <i>Pinkham Way</i> ’ is the term that is used in the Site Allocations DPD, so there is inconsistency in the names of the same site which is referenced in both the proposed alterations to Strategic Policies and the Site Allocations DPD.	It is recommended that there is a change in the terminology used in the document to replace the reference to ‘ <i>Friern Barnet Sewage Works</i> ’ with reference to ‘ <i>Pinkham Way</i> ’ which is the term that the Site Allocations DPD has adopted. A change would ensure that both documents are consistent.	Noted, this will be amended through a minor alteration.

Section 6, SP13: Open Space and Biodiversity

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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18	RSP49	SP 13	Not stated	Not stated	Existing rules are not stringent enough to avoid loss of open space.	SP13 should be examined to see how the regulations and council scrutiny can be tightened up.	The response related to matters not subject to alterations and are therefore outside the scope of the consultation. Nevertheless, it is considered SP13 offers significant protection to open space. No change
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Section 8, SP17: Delivering and monitoring the Local Plan: Strategic Policies (Alt80-89)

No comments received

Appendix 2: Housing trajectory (Alt90)

No comments received

Appendix 3: Monitoring Targets and Indicators (Alt91-101, 103, 107 and 109)

No comments received

Alt102 (see Section 3.1, SP1: Managing Growth)

No comments received

Alt104 (see Section 3.1, SP1: Managing Growth)

No comments received

Appendix 5: Glossary of Terms (Alt 105 and 106)

No comments received

Alt110 (see Section 5.1, SP8: Employment)

25	RSP66	Alt110 Employment Designations	Not Stated	Not Stated	<p>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.</p> <p>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.</p>	Not specifically stated	<p>Noted. The only Designated Employment Land to be de-designated is DEA8 N17 Studios 784-788 High Road, in accordance with the Employment Land Review. This is the site of the new Spurs Stadium and therefore the retention of the employment land designation is inconsistent with the recent grant of planning permission for the site.</p> <p>In total, the removal of this site from the designated supply results in a loss of 2.1ha from a total of 131.4ha (i.e. 1.6%). This is therefore well within the indicative industrial land release benchmark for Haringey of 24ha between 2011- 2031 within the Mayor’s Land for Industry and Transport Supplementary Planning Guidance (SPG). The change of designations from SIL, LSIS or EA to Local Employment Area –</p>
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							Regeneration Area, does not imply a removal of the employment land designation but rather alignment with wider regeneration potential within growth areas such as Tottenham, and Wood Green, or in response to existing circumstances in South Haringey & Green Lanes (Warehouse Living). No change
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Alt 111 (see Section 6.3, SP13: Open Space and Biodiversity)

No comments received

Section Not Specified

ID	Rep ID	Alteration	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
19	RSP50	Not stated	Not stated	Not stated	The Trust has no comments to make on this consultation, and are pleased to note the reference to the TCPA's Policy Advice Note: Inland Waterways , in the evidence and references.	Not stated	Noted.
21	RSP60	NA	No	Yes	The document "non-technical summary of the four sustainability appraisals" mentions the Haringey Warehouse District and issues with it, but the main document "Alterations to Strategic Policies Regulation 19" fails to address actual possible changes in this area, and how it will affect current work/live	Please provide clearer wording around the definition of the	It is considered that the policies in the DMDPD (specifically the Warehouse Living policy) and Site Allocations do a considerable amount

					<p>residents. The document seems to miss out on a clear definition (and therefore the root of my worry; understanding) of the area's currently versatile and multi-faceted use, where a majority of people work (either "remotely" from the area, or elsewhere in London) a "normal" job to fund various projects they invest their spare time in. These are the people and the projects which make the area "creative" (as phrased in the document in question) and with a long-term enabling plan these projects could help grow Haringey into a sustainable and growing economy. I'm all for making the area's properties safe to live in, and I appreciate the concern with which it has been ensured in the last couple of years, and all I want is to ensure future decisions are well-informed with this live/work community in mind - a community which would love to help shape the communal spaces to be more inclusive and green. Living in South Tottenham I understand the need to ensure the future and safety of our communities, and new developments like the ones newly erected along the reservoirs do not contribute to this, providing living opportunities only for those who can afford to buy £450,000+ properties.</p>	<p>population and use of the "Haringey Warehouse District".</p>	<p>to build upon the unique characteristics of the Warehouse District. The term 'Live/Work' is not applicable to the communal living and working arrangements taking place within these estates. The purpose of including a detailed Development Management Policy on Warehouse Living is to try and retain the current arrangement but ensuring this takes place in buildings that are fit for habitation.</p> <p>No change</p>
27	RSP68	General	Not stated	Not stated	<p>On a general point is it essential that there is consistency in the treatment of local charter and historic context when considering the delivery of growth in defined areas. The three areas identified of Area of Change, Growth Areas and other areas (i.e. Areas of Limited Change) have different approaches in how</p>	<p>Not specifically stated</p>	<p>Noted.</p>

					<p>they consider the integration and consideration of existing contextual qualities of a place. This includes respecting the historic context.</p> <p>The reference below helps illustrate this point further.</p>		
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Appendix K – Respondents to the Pre-Submission Proposals Map Consultation

ID	Respondent	Wishes to Attend Hearings
1	Elizabeth Sutton-Klein	yes
2	David Warren	Yes
3	Chris Mason	Yes
4	Highgate Society	Not stated

NB: PLEASE NOTE THAT THE PROPOSALS MAP IS NOT A DEVELOPMENT PLAN DOCUMENT

Appendix L – Individual Comments received to the Pre-Submission Proposals Map Consultation – by Respondent Order

NB: PLEASE NOTE THAT THE PROPOSALS MAP IS NOT A DEVELOPMENT PLAN DOCUMENT

Respondent 1: Elizabeth Sutton-Klein

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RPM1	Policy Mapping	No	No	Policies Map – Parkland Walk boundaries and notation..... Also in respect of this Nature Reserve, the Friends question whether it is wise to have the Nature reserve notation covering the Shepherd's Hill allotments that are not managed as part of the Nature Reserve. The Friends would prefer to see the mapping presented to be consistent with the allotments further East in Shepherd's Hill MOL and SINC (of different level of importance) or, if not of importance, no SINC status (as are the allotments at Mount Pleasant Villas). Also in respect of Policies Map, the Friends consider it	We have mapped the modifications which would be necessary to make the Local Plan map legally compliant and sound.	Although this is a GLA designation, we are planning to review our open spaces through a Revised Open Space Study. We will be surveying open space across the borough, down to 0.1 of a hectare.

				<p>is unsound to vary the extent of Metropolitan Open Land without discussion with ourselves as stakeholders, nor the opportunity to be consulted on proposed changes. The Friends note that there was discussion about the notation in the Inquiry in 1994 but the Friends are of the view that there has never been a debate, discussion or proposal to reduce MOL boundaries since they were originally designated in 1982. We note that in other places there have been some additional designations. The Friends endorse the mapping notation that maintains the MOL, Nature Reserve and SINC boundary on the lines of the fences of the original boundary as purchased from British Rail in the areas where sales have been made or leases for the temporary use of the Walk as residential garden extensions. A note is made at the end of this representation about the practice and administration of this asset. In respect of the Policies Map, alterations have been made rear or properties at Church Crescent, Muswell Hill; Treeside Place, Cranley Gardens; Land to the west of the house at 3 Francis Place off Holmesdale Road; a strip of land opposite Coleridge School in Crescent Road and the Mind Centre (formerly Station House, Stapleton Hall Road). In all these cases MOL could be de-designated by stealth by a mapping change, to which an objection is made as an unsound practice. As far as the Friends are concerned this appears to repeat mapping errors made before, but as in the case precedents of the Green Belt, the designation is as first made, unless changed as a formal proposal to de-designate or move the boundary in the plan making process. This has not been addressed through community engagement. In respect of the land that has been annexed to residential gardens, the Friends deplore this practice of</p>	<p>The consultation response software doesn't allow Friends of the Parkland Walk's map with the suggested revisions to be uploaded. We await instructions on how to send it. Maps are found in the attachments.</p>	<p>We believe this will provide a better opportunity to investigate the current ownership of these disputed areas, to inform how they should be designated.</p> <p>No change at this stage</p>
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					<p>selling or leasing areas of the Nature Reserve and parcels of MOL to become garden extensions. The land thus affected is neither parkland nor open. It does not contribute to the linear open land when used this way and it appears that no temporary planning permission was considered or granted for a temporary period to coincide with the leases given nor permanent permission applied for in the case of land actually sold. The Friends consider that the acquisition of rights (for lawful use over 10 years) is not the proper way to change the use, and in the case of leases which may expire, to secure the reversion to the nature reserve when the lease period and with it a temporary land use, expires). In respect of the alteration to the character of MOL, the practice of granting leases or sales damages the extent and character of the MOL. When land is lost, it is the expected practice to replace it with land of equal value. The Friends will raise with the Inspector at the Examination whether it is appropriate for him to consider the original boundary to be maintained and restored on reversion and, where not practical, to arrange for an area of replacement land to be designated in place of the losses. The Friends will put forward alternatives for replacement in due course.</p>		
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Respondent 2: David Warren

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RPM2	Strategic Policies	No	No	The Parkland Walk is situated on part of the former railway between Finsbury Park and Alexandra Place. When Haringey council acquired the land a large part of the land became the Parkland Walk	There is a need for maps and documents	Although this is a GLA designation, we are planning to review our open

				<p>open space, but other parts were allocated to other council uses, and some land was sold. Since then, there have been many other changes to the use of the former railway, and the actual boundary of the Parkland Walk has been varied on many occasions. In some cases the land remains with the council, but the use has changed. In other cases the land has been sold, leased or in a few cases leased and returned to use as an open space. Some areas have been lost to the council through adverse possession. At various later dates the land known as the Parkland Walk has acquired specific land-use designations. These include Metropolitan Open Land Local Nature Reserve Site of Importance for Nature Conservation Ecological Corridor Green Chain</p> <p>The combination of the changing boundary and the different dates of designation means that it is likely that these varied designations refer to different areas at a detailed level. It also means that as the boundary subsequently changes it becomes unclear what the designation is for specific areas. This obviously includes the area of the Parkland Walk itself, but the uncertainty also affects areas that are not now part of the open space. The processes for proposing, agreeing and recording these changes are unclear, and it means that in many places the designation is not known. For the definition of Metropolitan Open Space, it is understood that any changes must be made as part of the adoption of a new Local Plan. But no record of such changes is known. The designations are shown on the Local Plan Policies Map, but the scale of this is too small for detailed use on individual sites. Even at this scale in many</p>	<p>defining the exact boundaries of different land-use designations, together with a consistent and visible process for changing these as necessary, and following the correct legal procedures.</p>	<p>spaces through a Revised Open Space Study. We will be surveying open space across the borough, down to 0.1 of a hectare. We believe this will provide a better opportunity to investigate the current ownership of these disputed areas, to inform how they should be designated.</p> <p>No change at this stage</p>
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					places it can be seen that the assumed boundary does not correspond with the present boundary of council ownership or use. It is also noted that the Adopted 2006 Map includes the statement “Maps are for identification purposes only and must not be used for scaling or formal documentation.”		
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Respondent 3: Chris Mason

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RPM3	Parkland Walk boundaries and notation.	No	Yes	Policies Map – Parkland Walk boundaries and notation. The Friends of the Parkland Walk object to a practice that it regards as unsound of having the notation of a housing development site shown outlined in red on the policies map over an area of Metropolitan Open land, Nature Reserve, Green Chain, green corridor and SINC. A similar objection has been made to the Highgate Neighbourhood Plan and the view expressed there and repeated here, is that the developable land should be the site designated and allocated (in this case as SA 40 – in the case of the Neighbourhood Plan, KS5) and that the link referred to should be a different notation (in this case it could be the Green Chain notation to cover the desired link between the walkable part of the Parkland Walk and the connections to the north (in this case the footpath adjacent to Highgate Library). Also in respect of this Nature Reserve, the Friends question whether it is wise to have the Nature reserve notation covering the Shepherd's Hill allotments that are not managed as part of the Nature Reserve. The Friends would prefer to see the	Amendment to the MOL boundary in discussion with FPW as stakeholders and if there is an overall loss to enhance the designation by adding contiguous areas, as stated above.	Although this is a GLA designation, we are planning to review our open spaces through a Revised Open Space Study. We will be surveying open space across the borough, down to 0.1 of a hectare. We believe this will provide a better opportunity to investigate the current ownership of these disputed areas, to inform how they should be designated.

				<p>mapping presented to be consistent with the allotments further East in Shepherd's Hill MOL and SINC (of different level of importance) or, if not of importance, no SINC status (as are the allotments at Mount Pleasant Villas). Also in respect of Policies Map, the Friends consider it is unsound to vary the extent of Metropolitan Open Land without discussion with us as stakeholders, nor the opportunity to be consulted on proposed changes. The Friends note that there was discussion about the notation in the Inquiry in 1994 but the Friends are of the view that there has never been a debate, discussion or proposal to reduce MOL boundaries since they were originally designated in 1982. We note that in other places there have been some additional designations. The Friends endorse the mapping notation that maintains the MOL, Nature Reserve and SINC boundary on the lines of the fences of the original boundary as purchased from British Rail in the areas where sales have been made or leases for the temporary use of the Walk as residential garden extensions. A note is made at the end of this representation about the practice and administration of this asset. In respect of the Policies Map, alterations have been made rear or properties at Church Crescent, Muswell Hill; Treeside Place, Cranley Gardens; Land to the west of the house at 3 Francis Place off Holmesdale Road; a strip of land opposite Coleridge School in Crescent Road and the Mind Centre (formerly Station House, Stapleton Hall Road). In all these cases MOL could be de-designated by stealth by a mapping change, to which an objection is made as an unsound practice. As far as the Friends are concerned this appears to repeat mapping errors made before, but as in the case</p>		No change at this stage
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				<p>precedents of the Green Belt, the designation is as first made, unless changed as a formal proposal to de-designate or move the boundary in the plan making process. This has not been addressed through community engagement. In respect of the land that has been annexed to residential gardens, the Friends deplore this practice of selling or leasing areas of the Nature Reserve and parcels of MOL to become garden extensions. The land thus affected becomes neither parkland nor open. It does not contribute to the linear open land when used this way and it appears that no temporary planning permission was considered or granted for a temporary period to coincide with the leases granted nor permanent permission applied for and processed in the cases where land as actually sold freehold. The Friends consider that the acquisition of rights (for lawful use over 10 years) is not the proper way to change the use and, in the case of leases, which may expire, to secure the reversion to the nature reserve when the lease period, and with it a temporary land use, expires. In respect of the alteration to the character of MOL, the practice of granting leases or sales damages the extent and character of the MOL. When land is lost, it is the expected practice to replace it with land of equal value. The Friends will raise with the Inspector at the Examination whether it is appropriate for him to consider the original boundary to be maintained and restored on reversion and, where not practical, to arrange for an area of replacement land to be designated in place of the losses. The Friends will put forward alternatives for replacement in due course.</p>		
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Respondent 4: Highgate Society

ID	Rep ID	Allocation / Policy / Figure / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
4	RPM4	Policies Map	Not stated	Not stated	<p>Highgate's Archaeology : We note the discrepancy between the DM Policy Map and the Urban Characterisation Study Map</p> <p>The Highgate Society commends archaeological areas of significance as shown on the Map referred to in Highgate Neighbourhood Forum's Policy DH12</p>	Not specifically stated	<p>This response lacks clarity as to which map within the Urban Characterisation Study, and what discrepancy the society is referring to. Thus it is difficult for the Council to respond.</p> <p>No change</p>
4	RPM5	Policies Map	Not stated	Not stated	SINC on SA41 (Hillcrest) not shown	Map needs amending	<p>SINC designation is clearly shown on <u>SA44</u> on the Policies Map, which is consistent with the currently adopted Policies Map. Consequently, no amendment is needed.</p> <p>No change</p>