

# London Borough of Haringey

Haringey Local Development Framework

Core Strategy Submission

Soundness Self-Assessment

March 2011 (updated Feb 2012)

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**Haringey** Council

## Introduction

The Soundness Self Assessment is a method by which the Local Planning Authority delivering Development Plans Documents (DPDs) can ensure that it meets the requirements set out in The Planning and Compulsory Purchase Act 2004, The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended 2008); Planning Policy Statement 12 (PPS 12) Local Spatial Planning; and other relevant guidance and legislation. The structure of the toolkit, designed by the Planning Advisory Service, is based directly on the tests of the soundness and key questions in the Planning Inspectorate's guidance on the framework for assessing soundness.

### **PPS 12 sets out the requirements of 'soundness' as follows:**

To be 'sound' a core strategy should be JUSTIFIED, EFFECTIVE and consistent with NATIONAL POLICY.

'Justified' means that the document must be:

- Founded on a robust and credible evidence base
- The most appropriate strategy when considered against the reasonable alternatives

'Effective' means that the document must be:

- Deliverable
- Flexible
- Able to be monitored

The matrix below assesses whether Haringey has met all the above requirements during the production of the Core Strategy.

Further guidance can be found in PPS 12: Local Spatial Planning

<http://www.communities.gov.uk/documents/planningandbuilding/pdf/pps12lsp.pdf>

and the Plan Making Manual <http://www.pas.gov.uk/pas/core/page.do?pagelId=109798>

## Soundness tool

Key question	Evidence provided
<b>Justified</b>	
<b>Participation</b>	
<p>1. Has the consultation process allowed for effective engagement of all interested parties?</p>	<p>Yes. The Council undertook extensive and continuous engagement from the outset of the Local Development Framework (LDF) process. The various stages of consultation involved stakeholders, statutory agents and the wider community. These stages of engagement included:</p> <p>Issues and Options Feb-Mar 2008            Preferred Options May-June 2009            Proposed Submission May-June 2010            Additional Proposed Submission (focused changes on Affordable Housing and Employment Land) Nov – Dec 2010            Revised consultation on fundamental changes Sept – Nov 2011</p> <p>The details of who was involved, how they were invited and notified, the summary of responses received and how each stage informed the development of the Core Strategy can be found in the Consultation Statement (updated January 2012).</p>
<b>Research/ fact finding</b>	
<p>2. Is the content of the development plan document justified by the evidence?</p> <p>3. What is the source of the evidence?</p> <p>4. How up to date and convincing is it?</p>	<p>The Core Strategy is considered to be justified by up-to-date evidence. A significant number of relevant studies and pieces of research were carried out to inform the preparation of the Core Strategy. The supporting text in each section in the Core Strategy references the relevant supporting documents. The documents and studies include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• A Sustainability Appraisal;</li> <li>• Haringey Annual Monitoring Report;</li> <li>• Haringey Retail Capacity Study, 2008;</li> <li>• Haringey Employment Study, 2009;</li> <li>• Haringey Employment Land Update 2012;</li> <li>• Haringey Housing Needs Assessment, 2007;</li> <li>• North London Sub regional Strategic Housing Market Assessment 2011;</li> <li>• Haringey Open Space and Sports Assessment 2004 (updated 2008 as Haringey Open Space and Recreational Standards Supplementary Document);</li> </ul>

Key question	Evidence provided
	<ul style="list-style-type: none"> <li>• Climate change and capacity assessment for sustainable energy demand and supply in new buildings in Haringey (2009);</li> <li>• North London Strategic Flood Risk Assessment, 2008;</li> <li>• Census information;</li> <li>• Haringey Borough Profile;</li> <li>• Haringey Biodiversity Action Plan, 2009</li> <li>• Haringey Community Infrastructure Plan, 2009.</li> </ul> <p>All of this evidence has been carried out or updated in the last few years so can be considered up to date.</p> <p>This is further evidenced in the following response from Government Office for London (GOL) in their response to the Core Strategy Proposed Submission:  <i>'The evidence base and further policy specific summaries cover the key topic areas and they must contain the most up to date information... The Plan does take account of the fact that a strategy for 15 years is likely to cover several economic cycles which may impact upon the timing and delivery of development such as infrastructure. Changes to economic circumstances are unlikely to render the evidence base unsound. Provided the evidence base is up to date and accurate the policies would appear to have a sound basis.'</i></p> <p>The Affordable Housing Viability Study 2010, was completed following the consultation of the proposed submission document, and provided new evidence which, along with consultation responses, informed a focused change in the SP 2. This change was consulted on prior to submission of the Core Strategy.</p> <p>The North London Sub Regional Strategic Housing Market Assessment (SHMA) provides housing need and market evidence on a local and sub-regional level. The Core Strategy's housing need and market evidence is based on the London Strategic Housing Market Assessment and the Haringey Housing Needs Survey (HNS) (2007).</p> <p>Haringey's housing land supply evidence was updated through the London Strategic Housing Land Availability Assessment (SHLAA) (2009). This was informed by previous Housing Trajectories, and informed the latest one, which is published in the Core Strategy, and the Annual Monitoring Report.</p> <p>The preparation work for the Core Strategy included a Sustainability Appraisal (SA) to assess its environmental, social and economic impacts. This has helped to make sure the Council's strategy and policies are sustainable by identifying any potential harmful impacts and suggesting ways to</p>

Key question	Evidence provided
	<p>minimise them. It also helped to identify how to maximise beneficial impacts during the lifetime of the plan.</p>
<p>5. What assumptions had to be made in preparing the development plan document?</p> <p>6. Are the assumptions reasonable and justified?</p>	<p>The Core Strategy and a number of the supporting documents use the Greater London Authority (GLA) population projection (GLA Demographic Projections 2007). The Core Strategy sets out how it will respond to these projections, which, along with the Housing Trajectory, indicate the level of future growth and where the growth is likely to be. GLA projections are updated annually to reflect latest fertility/mortality, migration forecasts and planned development. GLA projections are used as a preference to trend based ONS statistics as they link population and household change to borough capacity.</p> <p>The Affordable Housing Viability study 2010 makes some assumptions based on market conditions, phasing and inflation, residential mix and buildings costs. These assumptions are based on a variety of up to date and reliable sources, and stakeholders' workshops and feedback. It was decided to assume 'normal' market conditions despite the downturn of the past few years. Using 'normal' market conditions figures will apply more accurately to the 15 year plan.</p> <p>The Core Strategy employment projections are based on the Employment Study 2009, and the London Plan (2008) which provides employment growth projections for the North London sub-region. These projections forecast future growth based on past trends. Haringey recognises the recent downturn will have an impact on these projections yet are committed to contributing to London wide and local employment target.</p>
Alternatives	
<p>7. Can it be shown that the council's chosen approach is the most appropriate given the reasonable alternatives?</p> <p>8. Have realistic alternatives been considered and is there a clear audit trail showing how and why the preferred strategy/approach was arrived at?</p> <p>9. Where a balance had to be struck in taking decisions</p>	<p>The Core Strategy is considered to be the most appropriate approach for shaping Haringey's future. The development of the Core Strategy has involved a progress of various options and alternatives to arrive at the current version.</p> <p>Haringey's Core Strategy Issues and Options Report (December 2007), presented five spatial objectives for the plan, and set out 78 questions for consideration which addressed the key challenges identified for the borough</p> <p>In response to the comments received in relation to the five spatial objectives of the Issues and Options Report four broad spatial options for the future development of the borough were identified. These options represented alternative strategies for achieving the Council's vision for Haringey.</p>

Key question	Evidence provided
<p>between competing alternatives is it clear how and why these decisions were made?</p>	<p>These four options each contributed towards achieving the spatial objectives, and reflected differing directions for the spatial development of the borough, and differing themes for sustainable growth and development. The options were:</p> <ul style="list-style-type: none"> <li>• Option A - A borough wide spatial approach focusing on identified areas of change</li> <li>• Option B – East/ Central/ West spatial approach</li> <li>• Option C - Housing Led Growth</li> <li>• Option D – Economic regeneration through employment growth</li> </ul> <p>Following discussions with the LDF Members Advisory Group and taking on board the feedback from the Issues and Option consultation, Option A was agreed as a preferred spatial approach and the most appropriate to shape the development of Haringey up to 2026.</p> <p>This set out the preferred approach for the development of the next stage of the Core Strategy and the Council published the Preferred Options Core Strategy titled ‘A New Plan for Haringey 2011-2026’ in May 2009. This set out the agreed policy areas to address the key challenges facing the future development of Haringey. The Core Strategy Preferred Options Report set out the vision, spatial objectives and preferred options, based on the spatial approach.</p> <p>Representations made in the first two stages of consultation were used in the development of the policies for the Proposed Submission document.</p> <p>An example of this development of policies is as evidenced by the Greater London Authority’s response to the Core Strategy Proposed Submission:  <i>‘The introduction of a specific Gypsies and Travellers policy safeguarding existing sites as well as setting out future accommodation needs (following GLA representations at the Preferred Options stage) is welcomed in line with London Plan policy.’</i></p> <p>Further meetings regarding the responses to the New Plan for Haringey and the further development of the Core Strategy took place with key consultees and internal officers during the preparation of the Proposed Submission Core Strategy document. This included meetings with the Haringey Strategic Partnership themed boards, Haringey NHS, the Joint Strategic Needs Assessment (JSNA), the Corporate Policy network and internal officers from relevant services. Ongoing discussions and input from key stakeholders and internal services has contributed to the development of the Proposed Submission document.</p> <p>The methodology for carrying out the Sustainability Appraisal, as proposed at the scoping stage was used to test each of the options in the Issues and Options document and predict their significant positive and negative impacts on the SA Objectives. Recommendations were made</p>

Key question	Evidence provided
	<p>regarding the most sustainable options in June 2008 and these suggestions were fed into the plan-making process, alongside the public consultation responses. The SA provided an initial appraisal on the spatial options identified for the Core Strategy (Options Discussion Paper – Initial Sustainability Options Appraisal (October 2008)), identifying which options had addressed the SA Objectives well. Following this, the four spatial options, including a fifth option, a ‘market driven’ approach were appraised against the SA Objectives. This appraisal identified which option was the most sustainable and which option was the least sustainable. The details of the assessment are provided in Section 4.3 of the main SA report. The SA on the Preferred Options appraised the preferred and alternative options and provided findings on which options were likely to address the SA Objectives. The SA also provided recommendations on how sustainability performance of the policies could be improved. The findings are presented in Section 4.4 and Appendix D of the main SA report. The Core Strategy Preferred Options Report and the accompanying SA were consulted on from 5<sup>th</sup> May until 30 June 2009. Following consultation, draft policies to implement the vision, objectives and preferred policy options have been developed.</p>
<p>10. Does the sustainability appraisal show how the different options perform and is it clear that sustainability considerations informed the content of the development plan document from the start?</p>	<p>The Sustainability Appraisal plays a key role in assessing the economic, social and environmental impacts of the Core Strategy and considering the alternative policy options and long term policy approach at each stage of the Core Strategy process.</p> <p>The SA process is an iterative process, which sought to appraise the Core Strategy during the various stages of plan development. The SA provided initial appraisals of options from the Issues and Options Report and during the development of the spatial options, which were incorporated into the development of each stage of the Core Strategy. The reports listed below present the detailed appraisals and the key, formal outputs of the process:</p> <p>A SA Scoping Report was prepared in 2007 for the Core Strategy and released for statutory consultation in November 2007. Part One of the Scoping Report relates to the Core Strategy, providing generic scoping information that applies to all Development Plan Documents (DPD). Part Two consisted of separate chapters providing additional scoping information relevant to individual DPDs, for example the Housing Supplementary Planning Document (SPD).</p> <p>A SA Report which appraised the Core Strategy Preferred Options was completed in May 2009 and was released for public consultation with the Core Strategy Preferred Options Report from May to June 2009.</p> <p>Following the changes to the Core Strategy as a result of the consultations, a Proposed Submission Core Strategy was produced by the Council. This SA Report presents the appraisal of the Proposed Submission Core Strategy.</p>

Key question	Evidence provided
	<p>In addition to this, an SA report was prepared to appraise the focused policy changes on SP2 Housing and SP8 Employment.</p> <p>A final SA Report was prepared for the Submission.</p> <p>An addendum to the main SA report was prepared for the revised consultation on the fundamental changes September 2011.</p>
<p>11. Does the development plan document adequately expand upon regional guidance rather than simply duplicate it?</p> <p>12. Does the strategy take forward the regional context reflecting the local issues and objectives?</p>	<p>Haringey's Core Strategy takes full account of the regional context. This is set out in Section 1.2 of the Core Strategy, <i>Haringey in London and north London</i>, and throughout the document where appropriate. The Core Strategy recognises the importance of the London Plan, within the East of England growth area, and Haringey as part of the North London sub-region. The links between Haringey and the regional and sub regional context is evident throughout the Core Strategy, which shapes the future growth of Haringey. The Core Strategy expands on the direction and policies set out in regional guidance which impact on Haringey, and avoids duplication of regional policies by managing the implications the regional guidance will have at a local level.</p> <p>Examples of this are as follows:</p> <ul style="list-style-type: none"> <li>• The London Plan designates Haringey Heartlands/Wood Green and Tottenham Hale as Areas of Intensification, as stated in Section 3.1 of the Core Strategy. <ul style="list-style-type: none"> <li>- This section sets out how the Council will deliver the proposals for Haringey Heartlands/Wood Green for the creation of new jobs and new homes as part of an intensive mixed use redevelopment. The Core Strategy recognises the potential for a range of development opportunities and refers to the Haringey Heartlands Development Framework (2005) which sets out the Council's overall vision for the area including promoting and expanding the Cultural Quarter, providing new homes and jobs, and high quality public space.</li> <li>- The Council recognises that Tottenham Hale currently fails to capitalise on its many advantages and vision for its transformation as a bustling new urban centre. This includes its exceptional natural environmental assets, such as its close proximity to Lee Valley Regional Park and its waterside location next to the River Lee offering significant environmental and recreational benefits. The Core Strategy sets out how Haringey will deliver this vision, along with the Tottenham Hale Urban Centre Masterplan Supplementary Planning Document (SPD), adopted in October 2006, which provides guidance on the redevelopment of key sites within the Tottenham Hale Urban Centre.</li> </ul> </li> <li>• The London Plan 2011 sets a London-wide annual housing target of 32,210 for ten years,</li> </ul>

Key question	Evidence provided
	<p>and a Haringey annual target of 820 additional dwellings. The Core Strategy sets out how the Council will deliver these houses over the 15 years of the Plan. In addition to this the Core Strategy details the overall numbers of homes to be built in the borough.</p> <ul style="list-style-type: none"> <li>• The Core Strategy’s Employment policies will safeguard the Haringey Strategic Industrial Locations identified in the London Plan. The Council will protect these sites against redevelopment and retained for employment.</li> <li>• The Mayor’s 2007 Climate Change Action Plan sets targets for 25% of London’s heat and power to be met through decentralised generation by 2025. Section 4.1 of the Core Strategy sets out how the Council will meet these ambitions ensuring all possibilities for site-wide or neighbourhood wide decentralised energy options and renewable energy options are considered. Additionally, in line with the London Plan energy hierarchy, the Council will expect developments to achieve a reduction in predicted carbon dioxide emissions of minimum 20% through the use of on-site renewable energy generation unless it can be demonstrated that such provision is not feasible. The majority of the sites investigated in the Climate Change, Site Development and Infrastructure Study 2009 are found to support the utilisation of renewable energy technologies to achieve a 20% reduction in predicted CO2 emissions.</li> </ul> <p>This is further evidenced by the response received from Government Office for London to the Core Strategy Proposed Submission:</p> <p><i>‘The framework set out in Chapter 1 and the links with national policy and the London Plan are clearly set out. There is a strong link between the overall strategy and individual policies of the Core Strategy and Haringey’s Sustainable Community Strategy. This means that the Council should achieve the strategic outcomes of the SCS set out in paragraph 1.5.3. The Core Strategy’s proposed approach represents a realistic option which is likely to provide good opportunities for growth and change across the borough.’</i></p> <p>A further example of how the Core Strategy takes forward the regional context is evidenced in Greater London Authority’s response to the Core Strategy Proposed Submission:</p> <p><i>‘Explicit reference to the requirement for new homes to be built to Lifetime Homes standards, with 10% of new housing to be wheelchair accessible (following GLA representation at preferred options stage) is welcomed in line with London Plan policy.’</i></p>

Effective	
Deliverable	
<p>13. Has the council clearly identified what the issues are that the development plan document is seeking to address?</p> <p>14. Have priorities been set so that it is clear what the development plan document is seeking to achieve?</p>	<p>Haringey's Core Strategy clearly identifies the issues it is seeking to address. The Core Strategy will aim to address the challenges which face the borough in the next 15 years. These includes;</p> <ul style="list-style-type: none"> <li>• Population change</li> <li>• Housing</li> <li>• Worklessness</li> <li>• Health inequalities</li> <li>• Climate change</li> <li>• High quality design</li> <li>• Equality and inclusion</li> <li>• Transport</li> <li>• Crime and safety</li> </ul> <p>The main body of the Core Strategy sets out Haringey's way forward on the key issues for the future, responding to the challenges the Council faces. The Core Strategy Vision is that of Council's Sustainable Community Strategy 2007-2016 which identifies priorities and a ten year vision for the borough. The overall vision is that Haringey will be:  <b>A place for diverse communities that people are proud to belong to.</b></p> <p>The spatial vision is underpinned by a number of key principles which guide and steer the LDF and its long term implementation (Section 1.5).</p> <p>This is further evidenced in the response received for Government Office for London to the Core Strategy Proposed Submission:  <i>'The Core Strategy is generally adequate in communicating Haringey's strategy for delivering both the Strategic Outcomes and the Vision set out in section 1.5.'</i></p>
<p>15. Are there any cross-boundary issues that should be addressed and, if so, have they been adequately addressed?</p>	<p>Haringey's Core Strategy recognises the borough's position in the north London, London and South East of England context, and cross-boundary issues are addressed throughout the Core Strategy. Section 1.2 highlights Haringey's strategic location in the London-Stansted-Cambridge-Peterborough growth area (Figure 1.3, page 10); and Haringey's important role in north London.</p> <p>Haringey works closely with neighbouring boroughs to ensure a consistent approach is taken in relation to growth areas and town centres which straddle borough boundaries. As such, discussions have taken place with Hackney in relation to the redevelopment of Woodberry Down, with Enfield and Waltham Forest in relation to Central Leaside. In addition, the Council are in the process of preparing, sub-regionally, a Strategic Housing Market Assessment (SHMA) and a joint</p>

	<p>Waste Plan with the six other boroughs in the north London Waste Authority (Barnet, Camden, Enfield, Hackney, Islington and Waltham Forest).</p> <p>Haringey also works with the GLA, LDA, TfL, NLSA and the London boroughs of Enfield and Waltham Forest to develop and implement solutions to cross boundary issues which affect the Upper Lee Valley growth corridor in the next 15 years.</p> <p>The Council, along with the boroughs of Barnet, Enfield, Waltham Forest and public, private and voluntary organisations work together as part of the North London Strategic Alliance (NLSA). Through the NLSA, the boroughs, together with the London Development Agency and the Greater London Authority have worked to develop a new vision for the much declined Upper Lee Valley that can guide the future of the area over a 20-30 year period.</p> <p>Other action areas of the borough which require partnership working with neighbouring boroughs include:</p> <ul style="list-style-type: none"> <li>• South Tottenham and Stamford Hill</li> <li>• Bounds Green and the North Circular Road corridor</li> <li>• Highgate</li> <li>• Finsbury Park and Manor House - with major regeneration projects at Finsbury Park station (in Islington) and at Woodberry Down (in Hackney)</li> </ul> <p>There are also major redevelopment proposals in adjoining boroughs which will have an effect on the borough, for example Cricklewood/Brent Cross area and London 2012/Stratford City.</p>
<p>16. Does the development plan document contain clear objectives?</p>	<p>Yes. The Council has developed a series of strategic objectives (Section 1.5) which take forward the Sustainable Community Strategy's strategic outcomes, identified in Section 1.5 and set out the basis for the Core Strategy and its key policies. These objectives give direction for the spatial strategy set out in Section 2.1 and are developed further in the core policies which are set out in Sections 3 - 8 of the document.</p>
<p>17. Are the objectives specific to the place; as opposed to being general and applicable to anywhere?</p> <p>18. Is there a direct relationship between the identified issues and the objectives?</p>	<p>Yes. Haringey's Core Strategy objectives are area specific and aim to highlight Haringey's distinct identity as set out in Section 1.3 <i>Making Haringey Distinctive</i>, and the objectives refer to specific locations in Section 1.5 <i>Vision and Objectives</i>, under the heading <i>Strategic Objectives</i>.</p> <p>The Core Strategy objectives were shaped in response to comments received during the Issues and Options and Preferred Options consultations which highlighted the importance of ensuring policies and objectives were locally distinctive and shaped around the needs and interests of the community.</p>

	<p>The Core Strategy sets out the spatial objectives which will achieve the spatial vision and address the challenges for the future of Haringey. The challenges facing Haringey are set out in Section 1.4 and the objectives in Section 1.5 set out to addresses these issues. Examples of how the objectives will address these issues include:</p> <p><b>Objective 1: People at the Heart of Change</b> will address population change and housing issues by delivering new homes and new jobs, with supporting services and transport and utility infrastructure at the right place and the right time.</p> <p><b>Objective 2: An Environmentally Sustainable Future</b> will respond to climate change and manage our environmental resources more effectively to make Haringey one of London's greenest boroughs.</p> <p><b>Objective 3: Economic Vitality and Prosperity Shared by All</b> will help meet business needs and provide local employment opportunities and promote a vibrant economy and independent living.</p> <p><b>Objective 4: Safer for All</b> will reduce both crime and fear of crime, through good design and improvements to the public realm and by creating safer, cleaner streets.</p> <p><b>Objective 5: Healthier People with a Better Quality of Life</b> will address health inequalities by providing better housing, meeting health and community needs and encouraging lifetime well-being at home, work, play and learning.</p> <p><b>Objective 6: People and customer focused</b> will address issues of equality and inclusion by providing high quality, accessible services that give value for money, respond to people's need and meet their aspirations. Put greater emphasis on community engagement and tackle social exclusion.</p>
<p>19. Is it clear how the policies will meet the objectives?</p> <p>20. Are there any obvious gaps in the policies, with regard to the objectives of the development plan document?</p>	<p>Section 1.5 sets out the Strategic Objectives which take forward the Sustainable Community Strategy's priorities. This table (page 50-51) sets out which Core Strategy policies will meet the objectives. The objectives give direction for the spatial strategy and are developed further in the strategic policies.</p> <p>Section 3-8 deals with the strategic policies and highlights how each policy contributes to the spatial aspects of the relevant priorities in Haringey's SCS, which in turn address the Core Strategy's objectives.</p> <p>The preparation work for the Core Strategy included a Sustainability Appraisal to assess its environmental, social and economic impacts. This has helped to make sure the Council's strategy and policies are sustainable and address all the identified objectives. It is recognised that some further detailed policies will be included in the emerging DM DPD and the Site Allocations DPD to support and deliver the Core Strategy objectives.</p>
<p>21. Are there realistic timescales related to the objectives?</p>	<p>The Core Strategy includes realistic timescales where appropriate.</p>

	<ul style="list-style-type: none"> <li>• The Housing Trajectory sets out timescales for the delivery of future housing in the borough (Appendix 2).</li> <li>• Section 4.1 sets out timescales for reducing carbon emissions and achieving targets to manage climate change.</li> <li>• The Community Infrastructure Plan set out when project will be carried out and when outcomes are likely to be completed (Appendix 3).</li> </ul> <p>All timescales have been informed by partnership working and are subject to consultation. Close monitoring of this plan will allow for flexibility and updating of information as appropriate.</p>
<p>22. Are the policies internally consistent?</p>	<p>Yes. The SA assessed the impact and compatibility of objectives and policies, and recommended mitigation measures for potential conflicts. It also highlighted potential positive and negative impacts of policies as they were developed throughout the various stages, making recommendations to ensure policies are consistent with each other throughout the document.</p> <p>Reponses to the Preferred Options and Proposed Submission consultation referred to the need for improved cross-referencing of policies within the document. To avoid repetition of policies throughout the Core Strategy relevant policies are cross referenced in the supporting text to ensure consistency.</p>
<p>23. Does the development plan document contain material which:</p> <ul style="list-style-type: none"> <li>• is already in another plan</li> <li>• should logically be in a different plan</li> <li>• should not be in a plan at all?</li> </ul>	<p>It is considered that all material in the Core Strategy is relevant and deals with issues specific to Haringey within a wider London context. Response to questions 11, 12 and 17 above demonstrates this issue further.</p> <p>The LDS sets out the documents of the LDF and when they will be delivered. The Core Strategy will be adopted first, followed by the DM DPD and the Site Allocations DPD, and a number of Area Action Plans. Appendix 1 sets out which Core Strategy policies and Development Management policies will replace and supersede the UDP saved Policies.</p> <p>During the consultation of the Core Strategy, representations were made on the appropriateness of policies included in the drafts. It was decided that some policies should be restructured, example: SP3 in Preferred Options, became SPs 4, 5 and 6, with further details included in the DM DPD relating to Flood Risk, Water Courses and Water Management; and Environmental Protection. Further to this a number of policies were considered more appropriate in the DM DPD but supported the Core Strategy.</p>
<p>24. Does the development plan</p>	<p>The Core Strategy sets out its objectives in paragraph 1.5.6. These objectives will be taken</p>

<p>document explain how its key policy objectives will be achieved?</p>	<p>forward and delivered by the policies in Section 3-8. The table on pages 50-51 gives further details of the links between the objectives and policies. Response to questions 19, 20 and 21 above demonstrates this issue further.</p> <p>The spatial strategy for Haringey sets out the key issues for the borough up to 2026 and how these will be addressed through policies. The Key Diagram identifies the Key Areas for the borough for which there are specific spatial policies for managing growth and change in the plan period. The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities at, or near, transportation hubs, and support appropriate development at other accessible locations, with more limited change elsewhere. This approach will:</p> <ul style="list-style-type: none"> <li>• Focus growth on places that can support higher density development, reducing pressure for residential development in predominantly residential areas (although some development will take place throughout the borough);</li> <li>• Allow us to better shape places by promoting high quality design of buildings and places, securing necessary infrastructure, providing an appropriate mix of uses, including community facilities and securing regeneration benefits; and</li> <li>• Through promoting larger schemes, increase our ability to provide more sustainable places, for example by maximising opportunities for local power and heating.</li> </ul> <p>Each policy in the Core Strategy sets out how it links to the relevant SCS objectives and how the spatial strategic policies will deliver these objectives.</p> <p>This is further evidenced by GOL's response to the Core Strategy Proposed Submission:  <i>'... There is a strong link between the overall strategy and individual policies of the Core Strategy and Haringey's Sustainable Community Strategy. This means that the Council should achieve the strategic outcomes of the SCS set out in paragraph 1.5.3. The Core Strategy's proposed approach represents a realistic option which is likely to provide good opportunities for growth and change across the borough.'</i></p>
<p>25. If there are development management policies, are they supportive of the strategy and objectives?</p>	<p>A Development Management policies document is currently being developed. The first draft of the document sets out how it links with and supports the Core Strategy. Subsequent documents will continue to do this.</p>
<p>26. Have the infrastructure implications of the strategy/policies clearly been</p>	<p>Yes. Infrastructure implications are highlighted throughout the document where relevant. Section 8.1 sets out SP16 <i>Community Infrastructure</i> which states how the Council will manage the needs and demands for community facilities. The Key Infrastructure Programme and Projects are set out</p>

<p>identified?</p>	<p>in Appendix 3.</p> <p>The Community Infrastructure Plan (CIP) which accompanies the Core Strategy identifies service areas where investment will be needed to meet the additional demand from population and housing growth over the next 15 years. It also sets the basis for policies for developers' contributions to meet future need. It also highlights where applicable gaps in existing provision are and forms a platform for funding bids to relevant agencies.</p> <p>The Council will maintain an 'infrastructure schedule' (Appendix 3) identifying key infrastructure projects required to support the delivery of the Core Strategy. The Council will continue to give appropriate consideration to the level of risk that some of the required infrastructure will not be forthcoming and ways that this might be mitigated or addressed. The implementation schedule identifies contingency planning where this may be required. The Council has consulted with and has regard to, the investment and operational plans of relevant infrastructure and public service providers, ensuring that these bodies recognise their contributions and that the resources required to deliver the infrastructure to support the delivery of the Core Strategy have been given due consideration and have a realistic prospect of being provided in the life of the Core Strategy.</p> <p>This is further evidenced in GOL's response to the Core Strategy Proposed Submission:  <i>'Appendix 3, the policies and their supporting text clearly sets out the key infrastructure needed to deliver the growth proposed in the Plan.'</i></p>
<p>27. Are the delivery mechanisms and timescales for implementation of the policies clearly identified?</p>	<p>Yes. Timescales and delivery mechanisms for policies are clearly set out where appropriate throughout the document. Examples include:</p> <ul style="list-style-type: none"> <li>• SP1 sets out how the Council will expect development in the borough's Growth Areas to provide approximately 5000 new homes and the majority of new business floorspace up to 2026. The delivery of the development in the Growth Areas will refer to the respective Masterplan and Development Framework which guides the redevelopment of the sites.</li> <li>• SP2 Housing shows how the borough will meet the housing target over the plan period.</li> <li>• SP 17 Delivering and Monitoring the Core Strategy sets out how the Council in partnership with the public, private and voluntary sector agencies will deliver the Core Strategy through the implementation of the strategic policies and the following other mechanisms: <ul style="list-style-type: none"> <li>- Working with our partners;</li> <li>- Community Infrastructure;</li> <li>- Development Management;</li> <li>- Planning obligations;</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>- Cross boundary working; and</li> <li>- Monitoring and review.</li> </ul> <p>A key mechanism for delivering the Core Strategy will be the Council's decisions on planning applications. The policies in the Core Strategy and the Development Management Policies document, and for relevant locations, the designations in the Council's Site Allocations document will provide the framework for these decisions. The Council will also take account of supplementary planning documents, including planning briefs, frameworks and conservation area statements and appraisals, when determining planning applications.</p> <p>Further detail on the delivery and timescales are set out in the Community Infrastructure Plan.</p> <p>Further LDF documents are currently being prepared which will help in delivering the Core Strategy. These include:</p> <ul style="list-style-type: none"> <li>- DM DPD</li> <li>- Site Allocation</li> <li>- Area Action Plans</li> </ul> <p>This is further evidenced in GOL's response to the Core Strategy Proposed Submission: <i>'The policies provide clear information on the scale and location of major growth and the infrastructure needed to deliver it, and this is supported in Appendix 3.'</i></p>
<p>28. Is it clear who is going to deliver the required infrastructure and does the timing of the provision complement the timescale of the strategy/policies?</p>	<p>The Community Infrastructure incorporates an audit of existing facilities and has been developed through engagement with officers in other Council services and stakeholders and external partners and stakeholders. In developing the CIP report, the methodology included consultation with statutory and other providers of services in Haringey. Workshops have been held to review current provision, identify current deficits and surpluses, and quantify additional requirements for services associated with population growth and future housing capacity, based on a range of national and regional standards, local models of service delivery as well as case studies.</p> <p>The development of the Community Infrastructure Plan ensures that service deliverers throughout the borough are fully aware of future growth in the borough and all stakeholders are sharing information and forward planning requirements. It has been agreed that the CIP will inform an ongoing dialogue between services, which is essential in planning for changes in the models of service delivery.</p> <p>The CIP recognises that local service providers are best placed to make judgements about the models of service delivery required in the borough, while following national and regional standards.</p>

	<p>The CIP incorporates draft requirements for future provision. This infrastructure analysis is intended to be a starting point. One of the key outcomes will be alignment between all partners on future requirements, incorporating both current local and evolving models of provision.</p> <p>The infrastructure schedule highlights the key delivery agencies and timescales for the delivery of infrastructure provision.</p>
<p>29. Is it clear who is intended to implement each part of the strategy/ development plan document?</p> <p>30. Where actions required to implement policy are outside the direct control of the council, is there evidence of commitment from the relevant organisation to implement the policies?</p>	<p>Response to questions 27 and 28 addresses this issue. Where appropriate the Core Strategy sets out which partners will support the implementation of the plan. Example include:</p> <ul style="list-style-type: none"> <li>• Section 4.2 Water Management and Flooding states that Haringey work closely with Lee Valley Park Authority to improve the River Lee in terms of flooding and sustainable development.</li> <li>• Section 4.3 Waste and Recycling states how Haringey is one of the seven North London boroughs who work in partnership to form the NLWA and are developing the NLWP DPD.</li> <li>• Section 4.4 Transport states that through the Local Implementation Plan, the Council is seeking TfL funding to implement a variety of schemes.</li> </ul> <p>The Council will work with Haringey’s Local Strategic Partnership and its sub regional and regional partners to deliver the vision, objectives and policies of the Core Strategy. The Council has secured the involvement and commitment of Haringey’s LSP and other key delivery partners to reflect their plans and spending programmes. The LSP recognises that it has an important role to play in relation to Core Strategy, in particular in bringing forward the key infrastructure programme set out in Appendix 3. In addition, the Council has agreed its Local Area Agreement (LAA) which contains a range of targets and goals to improve the services across the Council.</p>
<p>31. Does the development plan document reflect the concept of spatial planning?</p> <p>32. Does it go beyond traditional land use planning by bringing together – and integrating – policies for development, and the use of land, with other policies and programmes from a variety of organisations that influence the nature of places</p>	<p>The Core Strategy reflects the concept of spatial planning in the following ways:</p> <ul style="list-style-type: none"> <li>• It sets out a clear vision for the future of Haringey taking account of local issues and circumstances.</li> <li>• It presents a set of objectives and priorities to deliver the spatial vision and sets out the necessary infrastructure to support this delivery.</li> <li>• It is based on robust evidence, takes forward the vision and objectives of Haringey’s SCS, and has taken into account views after an extensive process of consultation and engagement with key stakeholders as set out in the Consultation Statement.</li> <li>• Section 2.1 clearly sets out the spatial strategy. This shows what is planned within</li> </ul>

and how they function?

the plan period.

- The Council works with neighbouring boroughs and the wider north London sub-region to ensure that Haringey's Core Strategy takes accounts of their plans and programmes as well as the spending and delivery plans of regional bodies such as the LDA and TfL.
- It reflects and is in line with other plans and strategies without repeating them. These include the plans of TfL, DfT, Network Rail, LDA, Metropolitan Police Authority, London Ambulance Service, NHS Haringey; as set out in Appendix 3 Key Infrastructure Programme and Projects. Other strategic plans are also referenced in the document including Upper Lee Valley Opportunity Area, Bridge New Deal for Communities Neighbourhood Plan, Redevelopment of Tottenham Hotspur Football Club.

The plan goes beyond traditional land use planning by integrating the Core Strategy with plans and policies from other services and organisations.

Examples include:

- SP1 takes into account the guidance set out in Transforming Tottenham Hale Urban Centre Masterplan SPD (2006) and Haringey Heartlands Development Framework, and also will help to deliver Haringey's Regeneration Strategy.
- SPs 4, 5 and 6 are linked with, and will aid in delivering the objectives of Haringey's Greenest Borough Strategy, and the Recycling Strategy for Haringey 2006-2020.
- SP7 is closely aligned with Haringey's Local Implementation Plan and the Mayor's draft Transport Strategy.

Haringey's Planning Policy team work continually with a range of partners to develop the Core Strategy and to ensure accurate integration of the plans and policies; this includes:

- Haringey's Strategic Partnership which includes members from NHS Haringey, Children and Young People's services, Haringey's Association for Voluntary and Community Organisations, and Homes for Haringey.
- Planning policy officers carried out continuous consultation with internal Council services in developing the Core Strategy including development management; housing, neighbourhoods, economic regeneration, parks and recreation, environment, corporate services. This consultation has continued throughout the process of the Core Strategy to ensure integration between services and strategies.

The plan reflects its spatial approach, away from traditional land use planning by assessing and identifying the infrastructure needed to deliver the plan, and identifying the partners and timescale required for delivery. Section 2.1 Spatial Strategy, Section 8.2 Delivering and Monitoring the Core

	<p>Strategy, and Appendix 3 Key Infrastructure Programme and Projects set out the infrastructure proposed during the plan period and the partners which will deliver.</p> <p>The plan also ensures integration between policies and the overall vision of the Core Strategy. Responses to the Preferred Options and Proposed Submission consultations highlighted the need and importance to cross-reference policies within the Core Strategy to demonstrate consistency and clarity throughout the document.</p>
<p>33. Does the development plan document take into account matters which may be imposed by circumstance, notwithstanding the council's views about the matter?</p>	<p>The Core Strategy is considered flexible enough to take into account matters which may be imposed by circumstances. This is further discussed in response to questions 34 and 35 below.</p>
<p><b>Flexible</b></p>	
<p>34. Is the development plan document flexible enough to respond to a variety of, or unexpected changes in, circumstances?</p>	<p>Yes. It is considered that the plan is flexible enough to respond to a variety of, or unexpected changes in, circumstances, while ensuring the vision and objectives of the Core Strategy are achieved. Flexibility is integrated into the plan to allow for expected and unexpected changes. Examples include:</p> <ul style="list-style-type: none"> <li>• <b>SP2 Housing:</b> The Council will seek to achieve the maximum reasonable proportion of affordable housing through negotiating section 106 agreements on all suitable development sites. Affordable housing should be provided on site so that it contributes to achieving the objective of creating more mixed communities and avoids creating concentrations of deprivation. There may be physical or other circumstances where off-site provision would be preferable or cases where the off site provision would be of superior quality than that which could be provided on site. Off-site provision misses the opportunity for creating mixed and balanced communities and will only be acceptable where the Council is satisfied that the preferred unit mix and tenure of affordable housing could not be provided on site.</li> <li>• <b>SP4 Working towards a Low Carbon Haringey:</b> All new developments will be required, where viable, to achieve a reduction in predicted carbon dioxide emissions of 20%.</li> <li>• <b>SP8 Employment:</b> The Council will take a flexible approach to local employment areas which are no longer suitable for industrial or other employment generating uses. In these cases, the uses that generate employment other than the B use class will be considered.</li> <li>• <b>SP17 Delivering and Monitoring the Core Strategy:</b> The Council has been working closely with infrastructure providers, delivery partners and other relevant organisations to ensure that the necessary infrastructure is planned and will continue to do so to ensure that the infrastructure to support the planned growth is delivered.</li> </ul>

	<p>The Council will monitor the effectiveness of the Core Strategy in delivering the objectives and policies by assessing the performance against a series of indicators. This monitoring framework is set out in the Council's Monitoring Framework supporting document (prepared for the Proposed Submission document May 2010) and includes core indicators set by government, local and contextual Haringey indicators. Each year the Council submits to the Secretary of State the Annual Monitoring Report which will:</p> <ul style="list-style-type: none"> <li>• Assess the performance of the Core Strategy policies and other policy documents, as set out in the Council's Local Development Scheme;</li> <li>• Set out the Council's housing trajectory;</li> <li>• Identify the need to reassess or review any policies or approaches,</li> <li>• Identify trends in the wider social, economic and environmental issues facing Haringey; and</li> <li>• Make sure the context and evidence behind our Core Strategy is still relevant.</li> </ul> <p>The flexibility of the plan is further evidenced in the following response from Government Office for London (GOL) in their response to the Core Strategy Proposed Submission:  <i>'... The Plan does take account of the fact that a strategy for 15 years is likely to cover several economic cycles which may impact upon the timing and delivery of development such as infrastructure. Changes to economic circumstances are unlikely to render the evidence base unsound. Provided the evidence base is up to date and accurate the policies would appear to have a sound basis.'</i></p>
<p>35. Is the development plan document sufficiently flexible to deal with any changes to, for example, housing figures from an emerging regional special strategy?</p>	<p>Yes. It is considered that the Core Strategy is sufficiently flexible to deal with any change, for example, housing figures from an emerging regional spatial strategy.</p> <p>When the Core Strategy was submitted the housing capacity for the borough, as set out in the London Plan 2008, was 6,800 from 2007/8 - 2016/17 based on evidence from the London Housing Capacity Study undertaken in 2004. Since then the new London Plan (2011) has been adopted and sets out a borough target of 8,200 additional dwellings over the period 2011 – 2021. The Core Strategy has adopted these figures.</p>
<p>36. Does the development plan document include the remedial actions that will be taken if the strategies/policies are failing?</p>	<p>Yes. It is considered that the plan is flexible enough to respond to a variety of, or unexpected changes in, circumstances, while ensuring the vision and objectives of the Core Strategy are achieved.</p> <p>The Council will monitor the effectiveness of the Core Strategy in delivering the objectives and policies by assessing the performance against a series of indicators. This monitoring framework is set out in the Council's Monitoring Framework supporting document and includes core indicators</p>

	<p>set by government, local and contextual Haringey indicators. Each year the Council submits to the Secretary of State the Annual Monitoring Report which will:</p> <ul style="list-style-type: none"> <li>• Assess the performance of the Core Strategy policies and other policy documents, as set out in the Council's Local Development Scheme;</li> <li>• Set out the Council's housing trajectory;</li> <li>• Identify the need to reassess or review any policies or approaches,</li> <li>• Identify trends in the wider social, economic and environmental issues facing Haringey; and</li> <li>• Make sure the context and evidence behind our Core Strategy is still relevant.</li> </ul>
<b>Monitoring</b>	
<p>37. Does the development plan document contain targets and milestones that relate to the delivery of the policies, including housing trajectories where the plan contains housing allocations?</p>	<p>Sections 3-8 of the Core Strategy sets out indicators to monitor the delivery of the relevant policy. Monitoring the policies will allow the Council to assess if the policies are delivering their objectives over the plan period, and whether a policy review is necessary. Monitoring and reviewing of policies is discussed in Section 8.2, paragraph 8.2.23. The monitoring framework is set out in the Council's Monitoring Framework supporting document and includes core indicators set by government, local and contextual Haringey indicators.</p> <p>This is further evidenced in GOL's response to the Core Strategy Proposed Submission: <i>'The targets (in the Monitoring Framework) look appropriate and we consider that the document adequately deals with the issue of monitoring...'</i></p>
<p>38. Is it clear how these are to be measured and are these linked to the production of the annual monitoring report?</p>	<p>Sections 3-8 of the Core Strategy sets out indicators to monitor the delivery of the relevant policy. Monitoring the policies will allow the Council to assess if the policies are delivering their objectives over the plan period, and whether a policy review is necessary.</p> <p>The Annual Monitoring Report is structured to reflect the Core Strategy including Housing, Environment, Economic Development, Town Centres and Community Infrastructure. The indicators set out in the policy chapters in the Core Strategy will be used to monitor and review the policies in future AMRs. Future AMRs will also include Significant Effects Indicators which are based on the Sustainability Appraisal of the Core Strategy. Future AMRs will be structured to align more closely with that of the LDF and the SCS.</p>
<p>39. Are suitable targets and indicators present (by when, how and by whom)?</p>	<p>Sections 3-8 of the Core Strategy sets out indicators to monitor the delivery of the relevant policy. Monitoring the policies will allow the Council to assess if the policies are delivering their objectives over the plan period, and whether a policy review is necessary. These indicators will be used to</p>

	<p>assess the plans performance. The monitoring framework includes timescales, where appropriate, such as the plan period targets for housing delivery.</p> <p>The development of the Community Infrastructure Plan ensures that service deliverers throughout the borough are fully aware of future growth in the borough and all stakeholders are sharing information and forward planning requirements. It has been agreed that the CIP will inform an ongoing dialogue between services, which is essential in planning for changes in the models of service delivery.</p> <p>The infrastructure schedule (Appendix 3) highlights the key delivery agencies and timescales for the delivery of infrastructure provision.</p>
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National policy	
<p>40. Does the development plan document contain any policies or proposals that are not consistent with national planning policy?</p> <p>41. If yes, is there a local justification?</p>	<p>It is considered that the Core Strategy does not contain any policies or proposals that are not consistent with national planning policy.</p> <p>Representations from English Heritage to the Proposed Submission indicated that the Core Strategy needed to refer to the new PPS5 (which was adopted after the Proposed Submission Document went to consultation) to be fully consistent with the national guidance. In response to this the Core Strategy will refer to and make necessary amendments in line with PPS5.</p>
<p>42. Does the development plan document contain policies that do not add anything to existing national guidance?</p> <p>43. If so, why have they been included?</p>	<p>It is considered that the Core Strategy does not include any policies that do not add anything to existing national guidance. All policies are considered to be locally specific, and in response to local issues identified.</p>