

Haringey Local Plan

Development Management

Sustainability Appraisal (SA) and Habitats
Regulations Assessment (HRA)

Addendum considering Inspector's Main
Modifications and Additional Modifications

November 2016

Haringey
LONDON

www.haringey.gov.uk



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1 Background

- 1.1 On 24 May 2016 Haringey Council submitted four emerging Local Plan documents – **Alterations to Strategic Policies, Development Management, Site Allocations and Tottenham Area Action Plan** – to the Secretary of State. An independent Planning Inspector, Christine Thorby MRTPI IHBC, was then appointed to conduct an examination of the Local Plan documents.
- 1.2 Examination hearings on the Local Plan documents were held between August and September 2016, subsequent to which the Inspector set out a series of **Main Modifications** considered necessary to ensure the emerging Local Plans are sound. A series of other **Additional (Minor) Modifications** have also been proposed, aimed mainly at improving the legibility and readability of the documents.
- 1.3 The Main and Additional Modifications will be subject to a statutory 6-week public consultation.
- 1.4 The Main and Additional Modifications have not previously been assessed through the **Sustainability Appraisal (SA)** and **Habitats Regulations Assessment (HRA)** process and therefore need to be appropriately considered. The modifications are the focus of this SA/HRA Report Addendum, discussed in further detail below.

Consultation

- 1.5 The Council has prepared this SA/HRA Report Addendum for public consultation alongside the proposed Main and Additional Modifications.
- 1.6 The Council invites consultation responses on any aspect on the content and processes set out in this SA/HRA report. The consultation runs from 18 November 2016 to 13 January 2017.
- 1.7 Responses should be sent -

By email:
localplan@haringey.gov.uk

By post:
**Planning Policy
Haringey Council
6th Floor - River Park House
225 High Road, London
N22 8HQ**
- 1.8 Responses must be received by **5 pm on 13 January 2017**.

2 This SA/HRA Report Addendum

- 2.1 The Local Plan is being developed alongside an iterative process of Sustainability Appraisal (SA) and Habitats Regulations Assessment (HRA). SA is used to ensure that the significant social, economic and environmental effects of the emerging Local Plans are systematically identified, considered and reported on. It is a requirement that SA is undertaken in line with the procedures set out in the Environmental Assessment of Plans and Programmes Regulations (the 'SEA Regulations') 2004. HRA considers the effects of the Local Plan on protected European habitats or species, in line with the Conservation of Habitats and Species Regulations 2010 (as amended).
- 2.2 This is an Addendum to the 'Pre-submission' SA/HRA Report (2015). It should be read alongside previous SA Reports, as relevant. Reports have been published throughout the different stages of the plan making process, including initial Scoping Reports, Interim SA Reports (published at the Regulation 18 stages) and Draft Final Reports (published at the Regulation 19 stage). An HRA report was prepared at the Regulation 19 stage.
- 2.3 All reports are available to access online from the individual plan pages at: www.haringey.gov.uk/localplan

- 2.4 The aim of this Addendum is to present information on the proposed Main and Additional Modifications with a view to informing the post-examination hearing public consultation and subsequent finalisation of the Local Plans. Specifically, this report seeks to screen the modifications to consider whether any further sustainability issues or implications are likely to arise from these.
- 2.5 As an addendum this report is concerned principally with presenting an appraisal of the modifications, rather than the draft Local Plan as a whole. However, consideration is given to the cumulative effects of the modifications in terms of their overall influence across the entirety of the plan, where appropriate.

3 Appraisal Methodology

Sustainability Appraisal

- 3.1 The scope of the Sustainability Appraisal (i.e. the sustainability issues and objectives that should be a focus of the appraisal) and methodology for carrying out the appraisal has been established through previous SA reporting on the Local Plan. Accordingly, this Addendum continues to apply the SA Framework established therein. Further details on scoping are available in previous reports and the SA Framework is re-provided in **Appendix A**.

Screening

3.2 The first step in appraisal of the proposed modifications is screening. This involves consideration of whether the modifications will substantively affect the policy approach or impact significantly on the strategic sustainability objectives.

3.3 A precautionary approach to screening is taken here. This ensures that any uncertainty as to whether a modification could lead to new or different significant social, economic or environmental effects is appropriately addressed. Modifications are 'screened in' where there is such uncertainty.

3.4 The exercise is set against the following screening categories:

Screen 1 (S1) - Technical clarification (e.g. factual update, grammatical/spelling correction, updates to signposted policies or documents, such as planning consents or legislation/policy, etc.) or a contextual amendment (e.g. changes to text within introductory sections which set the context for subsequent policies).

Screen 2 (S2) - Procedural clarification/change (e.g. amended supporting text on how a policy would be implemented, where the policy wording itself is not changed by the modification).

Screen 3 (S3) - Change to policy wording that would not alter how a policy would be expected to be interpreted and/or implemented (e.g. changes to policy wording and/or the supporting text to improve legibility).

3.5 Where one of these 3 screening criteria applies, modifications have been 'screened out' from further detailed sustainability appraisal consideration. This is on the basis that the modifications are unlikely to have potential significant effects and/or are unlikely to have implications for the (baseline) appraisal of the draft plan as set out in the 'Pre-Submission' SA Report (2015).

3.6 Where a modification has not been 'screened out' then it has been subject to further sustainability appraisal having regard to the SA Framework discussed above.

3.7 Outcomes of the screening and iterative sustainability appraisal process are set out in **Appendix B**. A high level summary of findings is also set out in the next section of this report.

3.8 The appraisal below relates to proposed Main and Additional Modifications and there is no discussion of 'reasonable alternatives' to the preferred approaches taken therein, unlike in previous reports. Where particular policy issues have been addressed through Main Modifications, it is appropriate that these are not subject to formal 'alternatives appraisal' through the SA process, given that these have been considered and established through the public examination process and are necessary to make the Plan sound.

Habitats Regulations Assessment

- 3.9 For HRA screening the modifications have been subject to an initial screening exercise according to the criteria set out in paragraph 3.4 above.
- 3.10 Where one of the 3 screening criteria applies, modifications have been screened out from further detailed HRA consideration. This is on the basis that the modifications are unlikely to have significant effects on protected sites and/or are unlikely to have implications for the (baseline) assessment of the draft plan as set out in the 'Pre-Submission' HRA report (2015).
- 3.11 Where a modification has not been 'screened out' through this initial exercise, then it has been subject to further HRA consideration. The intention here is to establish whether an additional assessment of 'likely significant effects' is needed, having regard to findings of the baseline assessment. The methodology for considering potential significant effects is set out in Section 2 of the 'Pre-Submission' HRA Report.
- 3.12 A precautionary approach to screening is taken here. This ensures that any uncertainty as to whether a modification could lead to new or different significant effects on protected sites is appropriately addressed. Modifications are 'screened in' where there is such uncertainty.
- 3.13 Outcomes of the initial screening and iterative assessment process are set out in **Appendix B**. A high level summary of findings is also set out in the next section of this report.

4 Summary

- 4.1 The following section summarises key findings of the Sustainability Appraisal and Habitats Regulations Assessment screening of the Main and Additional Modifications to Haringey's Local Plan.
- 4.2 It is important to note that neither the quantum of growth planned for the Borough over the plan period, nor the spatial distribution of this growth, has changed as a result of the Main Modifications. This SA/HRA Addendum is therefore set in the context of the same overall strategic framework (i.e. Haringey's spatial strategy) that was set out and considered at the Regulation 19 'Pre-Submission' stage. Where Modifications have been proposed for the Plan, these are principally changes to the detailed development requirements and guidelines which are considered necessary for reasons of soundness.

Sustainability Appraisal

- 4.3 The majority of modifications proposed were 'screened out' from further sustainability appraisal consideration. For the most part, this is owing to the modifications consisting of changes to policy wording, or procedural clarifications within the supporting text, which did not substantively alter the overall development management principles or corresponding implementation points.

- 4.4 Where modifications were ‘screened in’ it was often the case that the likely effects were assessed as being limited or insignificant in scope and the revised policy therefore did not impact on the baseline appraisal.
- 4.5 In a few instances the modifications introduced some uncertainty regarding likely significant effects on particular social, economic or environmental sustainability objectives as set out in the SA Framework. This included modifications to: DM6 (removal of the ‘public benefit’ test on taller building proposals); DM37 (added flexibility for provision of non-employment uses on safeguarded employment sites); and DM46/DM47 (threshold approaches for clustering of betting shops and hot food takeaways replaced with town centre vitality and viability tests). In these instances, the scope of positive effects on certain SA objectives may be more limited than set out in the baseline; however this is not so significant as to affect the main thrust of the appraisal findings for the policies in question.
- 4.6 The iterative appraisal process has demonstrated that the modifications do not significantly impact on the overall appraisal of the Plan, or trigger the need for new mitigation measures to manage effects. Furthermore, the modifications are not expected to result in any significant negative social, environmental or economic effects.

Habitats Regulations Assessment

- 4.7 A screening assessment on the ‘Pre-Submission’ HRA Report was undertaken for the Development Management document. This concluded that the Plan would not result in likely significant effects on European sites, either alone and in combination with other projects or plans.
- 4.8 The ‘Pre-Submission’ HRA Report identified a single policy (DM6 Building Heights) that had the potential to result in impact pathways that link to the Lee Valley SPA and Ramsar site. The Report concluded that the identified impact pathways could be screened out.
- 4.9 It is noted that the Development Management document was revised subsequent to the HRA reporting for the Local Plan, taking on board the recommendations. In particular, Policy DM19 (Nature Conservation) was updated to ensure protection for European sites, along with additional supporting text to provide for appropriate consideration of disturbances from construction activities, which the Report identified as a potential impact pathway. For further information, the SA/HRA Addendum to the Alterations to Strategic Policies should be referred.

- 4.10 As this Addendum has previously set out, the proposed modifications do not change the overall scale or location of development expected to be delivered in Haringey over the plan period. The bulk of modifications are principally changes to the detailed development requirements and guidelines, most of which have been 'screened out' from further HRA consideration, using the methodology set out in paragraph 3.4. The remaining modifications have been considered against the findings of the baseline assessment. It is considered that these findings remain applicable to the policies as modified.
- 4.11 In light of the above, it is concluded that the proposed modifications will not result in any likely significant effects on European sites, either alone or in combination with other projects or plans.

5 Appendix A – SA Framework

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Social		
Crime	Reduce crime, disorder and the fear of crime	<ul style="list-style-type: none"> • Encourage safety by design? • Reduce levels of crime? • Reduce the fear of crime? • Reduce levels of antisocial behaviour?
Education	Improve levels of educational attainment for all age groups and all sectors of society	<ul style="list-style-type: none"> • Increase levels of participation and attainment in education for all members of society? • Improve the provision of and access to education and training facilities? • Ensure educational facilities are accessible to residential areas? • Enhance education provision in-step with new housing?
Health	Improve physical and mental health for all and reduce health inequalities	<ul style="list-style-type: none"> • Improve access to health and social care services? • Prolong life expectancy and improve well-being? • Promote a network of quality, accessible open spaces? • Promote healthy lifestyles? • Provide good quality outdoor sports facilities and sites?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Housing	Provide greater choice, quality and diversity of housing across all tenures to meet the needs of residents	<ul style="list-style-type: none"> • Reduce homelessness? • Increase the availability of affordable housing? • Improve the condition of Local Authority housing stock? • Improve the diversity of the housing stock? • Promote the efficient reuse of existing housing stock whilst minimising the impact on residential amenity and character? • Create balanced communities of different affordable housing types, densities and tenures? • Create integrated, mixed-use tenure developments?
Community Cohesion	Protect and enhance community spirit and cohesion	<ul style="list-style-type: none"> • Promote a sense of cultural identity, belonging and well-being? • Develop opportunities for community involvement? • Support strong relationships between people from different backgrounds and communities?
Accessibility	Improve access to services and amenities for all groups	<ul style="list-style-type: none"> • Improve access to cultural and leisure facilities? • Maintain and improve access to essential services (banking, health, education) facilities?
Economic		
Economic Growth	Encourage sustainable economic growth and business development across the borough	<ul style="list-style-type: none"> • Retain existing local employment and create local employment opportunities? • Diversify employment opportunities? • Meet the needs of different sectors of the economy? • To facilitate new land and business development?
Skills and Training	Develop the skills and training needed to establish and maintain a healthy labour pool	<ul style="list-style-type: none"> • Improve lifelong learning opportunities and work related training? • Reduce high levels of unemployment and worklessness? • Facilitate development of new and improved training facilities in high unemployment areas?
Economic Inclusion	Encourage economic inclusion	<ul style="list-style-type: none"> • Improve physical accessibility to local and London-wide jobs? • Support flexible working patterns? • Encourage new businesses?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Town Centres	Improve the vitality and vibrancy of town centres	<ul style="list-style-type: none"> • Enhance the environmental quality of the borough's town centres? • Promote the borough's town centres as a place to live, work and visit? • Ensure that the borough's town centres are easily accessible and meet local needs and requirements? • Promote high quality buildings and public realm?
Environmental		
Biodiversity	Protect and enhance biodiversity	<ul style="list-style-type: none"> • Protect and enhance biodiversity at designated and non-designated sites? • Link and enhance habitats and wildlife corridors? • Provide opportunities for people to access wildlife and diverse open green spaces?
Townscape and Cultural Heritage	Protect and enhance the borough's townscape and cultural heritage resources and the wider London townscape	<ul style="list-style-type: none"> • Promote townscape character and quality? • Preserve or enhance buildings and areas of architectural and historic interest?
Open Space	Protect and enhance the borough's landscape resources	<ul style="list-style-type: none"> • Promote a network of quality, accessible open spaces? • Address deficiencies in open space provision?
Water Resources	Protect and enhance the quality of water features and resources	<ul style="list-style-type: none"> • Preserve ground and surface water quality? • Conserve water resources? • Incorporate measures to reduce water consumption?
Soil and Land Quality	Encourage the use of previously developed land	<ul style="list-style-type: none"> • Encourage the development and remediation of brownfield land? • Promote the efficient and effective use of land whilst minimising environmental impacts?
Flood Risk and Climate Change	Mitigate and adapt to climate change	<ul style="list-style-type: none"> • Reduce and manage flood risk from all sources? • Encourage the inclusion of SUDS in new development?
Air Quality	Protect and improve air quality	<ul style="list-style-type: none"> • Manage air quality within the borough? • Encourage businesses to produce travel plans?
Noise	Minimise the impact of the ambient noise environment	<ul style="list-style-type: none"> • Minimise the impact of the ambient noise environment?

Topic	SA Objective	Appraisal criteria <i>Will the policy approach under consideration help to...</i>
Energy and Carbon	Limit climate change by minimising energy use reducing CO2 emissions	<ul style="list-style-type: none"> • Minimise the use of energy? • Increase energy efficiency and support affordable warmth initiatives? • Increase the use of renewable energy? • Mitigate against the urban heat island effect? • Ensure type and capacity of infrastructure is known for future development?
Waste Management	Ensure the sustainable use of natural resources	<ul style="list-style-type: none"> • Reduce the consumption of raw materials (particularly those from finite or unsustainable sources)? • Encourage the re-use of goods? • Reduce the production of waste? • Support the use of sustainable materials and construction methods? • Increase the proportion of waste recycling and composting across all sectors?
Sustainable Transport	Promote the use of sustainable modes of transport	<ul style="list-style-type: none"> • Improve the amenity and connectivity of walking and cycling routes? • Promote the use of public transport? • Reduce the use of the private car? • Encourage development in growth areas and town centres and reduce commuting?

6 Appendix B – Screening / Iterative Appraisal

Development Management				
Main Modifications				
Modification Reference	Policy / Para / Page	Description of Change	SA Screening	HRA Screening
DMMod1	Whole Plan	Throughout documents: Replace “Consequentially” with “Consequently”	S1	S1
DMMod2	Whole Plan	As a result of additions or deletions, amend subsequent policy and paragraph numbering throughout the document and ensure subheadings in reasoned justification to the policies remain relevant	S1	S1
DMMod3	Whole Plan	Replace “shop fronts” with “Shopfronts” throughout the document	S1	S1
DMMod4	Policy DM2	Amend Policy DM2 Part A(d) to read: d. Comply with <u>Have regard to</u> the principles set out in ‘Secured by dD Design’.	S3	S3
DMMod5	Paragraph 2.14	Add an additional sentence at end of paragraph 2.14 to read: <u>Proposals will be assessed against the principles of ‘Secured by Design’. The latest published guidance in this respect should be referred.</u>	S2	S2
DMMod6	Policy DM3	Amend Policy DM3 Part A(c) to read: c. Appropriately Mm <u>maintained in perpetuity.</u>	S3	S3
DMMod7	Policy DM3	Amend second sentence of Policy DM3 Part B to read: <u>The management of tT these spaces, including their use and public access, will need to be agreed by the Council</u>	S3	S3

		<u>should be positively managed, maintained to a high standard, and public access secured.</u>		
DMMod8	Policy DM5	<p><i>Amend Policy DM5 Part A(b) to read:</i></p> <p>b. Makes a positive contribution to the <u>characteristics and</u> composition of the local view, <u>where possible</u>; and</p>	The changes provide for further flexibility on the consideration of proposals having regard to individual site circumstances and set out further details to assist with implementation (i.e. regard to 'characteristics of the local view'). Overall, the key policy principles remain intact and the modification is therefore not considered to impact on the appraisal.	No change
DMMod9	Policy DM5	<p><i>Amend Policy DM5 Part A(c) as follows:</i></p> <p>c. Be consistent with <u>Has had regard to</u> the Council's Tall Buildings and Views Supplementary Planning Document."</p>	S3	S3
DMMod10	Policy DM5	<p><i>Amend Policy DM5 to include an additional criterion DM5 Part E to read:</i></p> <p><u>E. Proposals should have regard to views identified in Conservation Area Appraisals and Management Plans (See Policy DM9).</u></p>	<p>S3</p> <p>This criterion has been elevated from the supporting text with additional strengthening through a cross-reference to DM9. The modification is not considered to affect how the policy or Plan would be implemented and therefore does not impact on the appraisal findings.</p>	S3

DMMod11	Figure 2.1	<i>Graphic update to improve legibility of map (i.e. scale and resolution).</i>	S1	S1
DMMod12	Policy DM6	<p><i>Amend Policy DM6 Part B to read:</i></p> <p>B. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in <u>community benefit as well as</u> urban design terms and should conform to the following general design requirements:</p>	The sustainability effects of this modification are uncertain. This is because effects on the sustainability objectives would be subject to the nature of individual proposals and the specific community benefits that would have been provided as justification for schemes. Where the appraisal has previously considered the remaining requirements (i.e. urban design) it identified significant positive effects and this remains unchanged.	No change
DMMod13	Policy DM6	<p><i>Amend Policy DM6 Part C(c) as follows:</i></p> <p>c. <u>Be consistent with Have regard to</u> the Council’s Tall Buildings and Views Supplementary Planning Document.”</p>	S3	S3
DMMod14	Figure 2.2	<i>Amend Figure 2.2 to include two additional locations potentially suitable for tall buildings - Apex House and Finsbury Park – to accord with the SLR evidence base.</i>	S1	S1
DMMod15	Policy DM9	<p><i>Amend Policy DM9 Part A to read:</i></p> <p>A. Development that <u>sustains conserves</u> and enhances the significance of a heritage asset and its setting will be supported.</p>	S3	S3
DMMod16	Policy DM9	<i>Delete the last sentence of Policy DM9 Part J(c) as follows:</i>	The policy has been amended to ensure consistency with	No change

		<p>c. The proposals address relevant policies (A-I) above. <u>Proposals that cause harm should be exceptional in relation to the significance of the asset, and be clearly and convincingly justified in line with national policy.</u></p>	<p>national policy. The criterion continues to provide that proposals must address the full complement of policies within DM9, which provide a robust basis for assessing impact on the significance of heritage assets. The modification is not considered to impact on the overall appraisal the policy, which provides for significant positive effects.</p>	
DMMod17	Paragraph 2.75	<p><i>Amend the second to last sentence of paragraph 2.75 to read:</i></p> <p>If it is suitably demonstrated that this is not possible, a programme of conservation will be required including satisfactory excavation and recording of remains on site along with arrangements for archiving, <u>including publication and deposition in an appropriate designated museum.</u></p>	S2	S2
DMMod18	Policy DM11	<p><i>Delete Policy DM11 Part A(d) as follows:</i></p> <p><u>d. The need to optimise housing outputs on sites</u></p>	<p>S3</p> <p>DM11 includes another criterion addressing the need to optimise housing potential of sites. The modification does not impact on the appraisal findings.</p>	S3
DMMod19	Policy DM11	<p><i>Amend Policy DM11 Part A(e) to read:</i></p> <p>e. The need to achieve <u>inclusive and</u> mixed <u>and balanced</u></p>	S3	S3

		sustainable communities.		
DMMod20	Policy DM 11	<p>Delete Policy DM11 Part E as follows:</p> <p><u>E. Institutional investment which provides long term investment in the private rental sector (not including accommodation for students) will be supported by the Council where it meets local housing needs and is of a high quality and consistent with the policies in this Plan, including the requirement to provide affordable housing.</u></p>	<p>S3</p> <p>This has been moved to the supporting text as an implementation/guidance point. The modification does not impact on the appraisal findings.</p>	S3
DMMod21	Paragraph 3.9	<p>Include the following after the 3rd sentence at paragraph 3.9:</p> <p><u>In accordance with the London Plan, the distinct economics of covenanted private rented developments will be taken into account in the assessment of scheme viability.</u></p>	S2	
DMMod22	Paragraph 3.9	<p>Amend paragraph 3.9 to include additional wording at the end of paragraph to read:</p> <p><u>Institutional investment which provides long-term investment in the private rental sector (not including accommodation for students) will be supported by the Council where it meets local housing needs, is of a high quality and consistent with the policies in this plan, including the requirement to provide affordable housing.</u></p>	S2	S2
DMMod23	Policy DM12	<p>Amend Policy DM12 to include a new criterion DM12 Part F to read:</p> <p><u>F. Proposals for residential extensions should have regard to the Council's relevant Supplementary Planning Documents, where appropriate, including the</u></p>	<p>S3</p> <p>This criterion has been elevated from the supporting text and provides further clarification on how the</p>	S3

		<u>South Tottenham House Extensions SPD.</u>	policy would be implemented. The modification does not therefore impact on the appraisal.	
DMMod24	Paragraph 3.17	<u>The Council considers that there are exceptional circumstances for residential extensions in South Tottenham that merit further considerations. Proposals will therefore be expected to have regard to the South Tottenham House Extensions Supplementary Planning Document.</u>	S2/S3 This criterion has been elevated to the supporting text. The modification does not therefore impact on the appraisal.	S2/S3
DMMod25	Policy DM13	<i>Amend Policy DM13 Part B(a) to read:</i> a. Sites that are artificially sub-divided or re-developed in phases. <u>This will be assessed based on the following:</u> <u>i. Whether the sites/land parcels are in the same ownership;</u> <u>ii. The occupied status of sites/land parcels at the grant of planning permission for the first application and at the commencement of the development;</u> <u>iii. Land agent/infrastructure provider intelligence as to development interest; and</u> <u>iv. The time lapsed between completion of the first development before planning permission is sought for the next.</u>	S3 The policy now includes additional details for how relevant development proposals would be assessed, but this does not change the policy principle. The modification does not therefore impact on the appraisal.	S3
DMMod26	Policy DM13	<i>Delete Policy DM13 Part B(b) as follows:</i> <u>b. Additional residential units that are created through amended planning applications;</u>	For appraisal purposes, this modification is considered alongside the modification on DM13 Part B(c). The policies have been amended to clarify that affordable housing	No change

			requirements will apply to additional residential units proposed above that provided by unimplemented permitted development. The modification is expected to ensure effective implementation of the policy. The policy is therefore likely to continue to result in significant positive effects, as set out in the baseline appraisal.	
DMMod27	Policy DM13	<p><i>Amend Policy DM13 Part B(c) to read:</i></p> <p>c. Additional residential units proposed above that <u>provided</u> by <u>unimplemented</u> permitted development;</p>	For appraisal purposes, this modification is considered alongside the modification on DM13 Part B(b). The policies have been amended to clarify that affordable housing requirements will apply to additional residential units proposed above that provided by unimplemented permitted development. The modification is expected to ensure effective implementation of the policy. The policy is therefore likely to continue to result in significant positive effects, as set out in the baseline appraisal.	No change
DMMod28	Policy DM13	<i>DM13 B (e) has a second (e) in the numbering which</i>	S1	S1

		<i>should be deleted.</i>		
DMMod29	Policy DM13	Amend Policy DM13 Part F(b) to read: b. Secure a more <u>balanced inclusive and mixed</u> community <u>in accordance with Policy DM11</u> .	S3	S3
DMMod30	Policy DM13	Delete Policy DM13 Part G as follows: <u>G. The Council will seek to achieve 20% of new units on small sites to be achieved as affordable, in line with SP2 and set out in the Planning Obligations SPD.</u>	This modification will result in fewer affordable units over the plan period – however it will not worsen the baseline situation and the SA conclusions of a significant overall positive effect regarding housing delivery still hold, as many schemes of 10 or fewer units would not viably be able to deliver affordable units, and so the net impact will be de-minimus in the overall supply of affordable units. There are also no alternative policy approaches to secure affordable housing from smaller developments as it has been specifically precluded by the Government, the effect of this decision will have been subject of separate analysis by CLG.	No change
DMMod31	Policy DM13	Delete Policy DM13 Part H as follows: <u>H. Cash in-lieu contributions are only acceptable as a</u>	S3 This requirement is covered	S3

		<u>last resort and are also subject to the exceptional circumstances listed above.</u>	elsewhere in the policy and the change avoids unnecessary duplication. The modification is not considered to impact on the appraisal.	
DMMod32	Paragraph 3.21	<p><i>Insert an additional paragraph after paragraph 3.21 to read:</i></p> <p><u>Where a building or part of a building benefits from an unimplemented prior approval for conversion to residential use as permitted development, proposals for additional residential development (i.e. through extension to the building or further change of use), will be subject to the requirement for affordable housing. In such circumstances, the affordable housing assessment will take account the total residential units to be provided in the development as a whole.</u></p>	S2	S2
DMMod33	Policy DM15	<p><i>Amend Policy DM15 Part B(b)(iii) to read:</i></p> <p>iii. <u>Necessary</u> level of supervision, management and care/support;</p>	S3	S3
DMMod34	Policy DM15	<p><i>Amend Policy DM15 Part D(c) to read:</i></p> <p>c. The accommodation is of a high <u>standard quality design</u>, including <u>adequate consideration for</u> unit size, <u>and compliance with</u> daylight and sunlight <u>standards</u>;</p>	S3	S3
DMMod35	Policy DM15	<p><i>Amend Policy DM15 Part D(f) to read:</i></p> <p>f. The accommodation can be secured by agreement for occupation by members of a specified educational institution(s), or, <u>subject to viability</u>, the proposal will provide an element of affordable student</p>	<p>S3</p> <p>The policy now includes a reference to viability in respect of affordable housing delivery, a point which is also</p>	S3

		accommodation in accordance with Policy DM13 .	addressed in DM13. The modification is not considered to impact on the appraisal findings.	
DMMod36	Paragraph 3.33	<p><i>Amend text from second sentence of paragraph 3.33 and include additional text after last sentence of the paragraph to read:</i></p> <p>Applicants should submit evidence of an undertaking where appropriate. Where there is not an undertaking by involving a specific educational institution, providers will be expected to deliver an element of student accommodation that is affordable for students in line with the London Plan and associated guidance, including the Mayor’s Housing SPG, which sets out further details in this regard. To avoid confusion, an “undertaking” is a nominations agreement between a provider of Purpose Built Student Accommodation (PBSA) and one or more academic institutions.</p>	S2	S2
DMMod37	Paragraph 3.33	<p><i>Insert an additional paragraph following paragraph 3.33 to read:</i></p> <p>Student accommodation is included within the London Plan strategic housing requirement for Haringey. Being non-conventional housing, it will be captured separately for monitoring purposes within the Authority Monitoring Report. This will complement information provided through the Mayor’s Academic Forum which informs London Plan monitoring.</p>	S2	S2
DMMod38	Policy DM16	<p><i>Amend Policy DM16 Part A(g) to read:</i></p> <p>g. The proposal provides for a mix of unit sizes in line with Policy DM11 (i.e. proposals which seek to</p>	<p>S3</p> <p>The policy now includes a policy cross-reference to</p>	<p>S3</p> <p>The policy now includes a policy cross-reference to</p>

		<u>maximise the number of one bedroom or studio units will not be acceptable where an alternative mix including larger units could be practically provided).</u>	DM11 which sets the detailed strategic requirements on housing mix. This does change the policy principle and the modification therefore does not impact on the appraisal of the policy or the Plan.	DM11 which sets the detailed strategic requirements on housing mix. This does change the policy principle and the modification therefore does not impact on the appraisal of the policy or the Plan.
DMMod39	Paragraph 3.36	<i>Amend 2nd sentence of paragraph 3.36 to read:</i> This will ensure the Council can protect the remaining existing stock of family houses (<u>3+ bedrooms</u>) within these areas (see Figure 3.1 'Family Housing Protection Zone'), and to ensure that, across the Borough, the range of Haringey's housing needs can be met.	S2	S2
DMMod40	Policy DM17	<i>Delete Policy DM17 Part A(c) as follows:</i> <u>c. They satisfy the appropriate Haringey Environmental Health Standards.</u>	S3 This matter is covered by separate legislation and has been moved to a reference in the supporting text.	S3
DMMod41	DM17 Part B(a)	<i>Amend Part B(a) of Policy DM17 to read:</i> a. Where the property does not meet the appropriate standards for an HMO (<u>as set out in the Housing Act 2004 and the Management of HMOs (England) (Regulations) 2006</u>) and has no realistic prospect of meeting the standards; or	S1/S3	S1/S3
DMMod42	Paragraph 3.39	<i>Amend the second sentence of paragraph 3.39 to read:</i> The Article 4 Direction requires those wishing to change a single use dwelling unit (<u>C43</u> Use Class) to a small HMO (<u>C34</u> Use Class) within this area of the Borough to apply	S1	S1

		for planning permission.		
DMMod43	Paragraph 3.39	<p><i>Include the following additional text at the end of paragraph 3.39:</i></p> <p><u>HMOs will be required to satisfy the appropriate Haringey Environmental Health Standards.</u></p>	S2	S2
DMMod44	Policy DM18	<p><i>Amend DM18 Part B to read:</i></p> <p>B. <u>The Council will not permit Proposals</u> for basements <u>which must not</u> include habitable rooms or other sensitive uses in areas prone to flooding where there is no reasonable means of escape.</p>	S3	S3
DMMod45	Policy DM20	<p><i>Amend Part A of Policy DM20 as follows:</i></p> <p>A. <u>Open Space is protected from inappropriate development by Policy SP13. The Council will not grant planning permission for proposals for development that protects and enhances Haringey's open spaces will be supported. that would result in the loss of open space., unless an assessment has been undertaken which shows that the open space is surplus to requirements for the use as an open space.</u></p>	<p>S3</p> <p>The key principle of the policy (i.e. protection against loss of open space) remains intact through the modification. The modification is therefore not considered to impact on the appraisal.</p>	S3
DMMod46	Policy DM20	<p><i>Amend Part G of Policy DM20 to read:</i></p> <p>...on the site, <u>in accordance with the open space standards set out in the Haringey Open Space and Biodiversity Study (2013)</u>, subject to viability.</p>	<p>The modification clarifies expectations for open space provision by reference to local standards. This is likely to have positive effects on environmental and social sustainability objectives however recognising the baseline appraisal already set out significant positive effects in this regard.</p>	No change

DMMod47	Paragraph 4.11	<p><i>Delete the last sentence of the paragraph and replace with the following:</i></p> <p><u>The NPPF states that existing open space, sport and recreation facilities should not be built on unless clearly surplus to requirements, or where the loss would be replaced by equivalent or better provision in terms of quantity and quality, or where the need for and benefits of the development clearly outweigh the loss. Haringey's Open Space and Biodiversity Study (2013) shows that there is a significant quantitative shortfall in accessible open space to meet the needs of the Borough's population, and for this reason Strategic Policy SP13 establishes a presumption against any net loss of open space, and with the exception of small scale ancillary facilities, resists development on open spaces.</u></p>	S2	S2
DMMod48	Paragraph 4.15	<p><i>Amend paragraph 4.15 as follows:</i></p> <p>The population in Haringey is projected to increase by approximately 75,000 people between 2015-2035. <u>The additional population will be accommodated through the promotion of more compact urban development on existing brownfield land. This, however, should not lead to a reduction in amenity and places greater priority on the need to protect and maintain a well-distributed, well-connected and accessible supply of open space. will place pressure on local services, including open spaces. In this context, it is important that the Council prioritises the protection and enhancement of the Borough's open spaces, as well as improving public access to them. For this reason, open space does not fall within the NPPF definition of 'brownfield / previously-developed sites', although brownfield sites</u></p>	S2	S2

		<u>that exhibit open space characteristics offer the potential to secure further provision upon redevelopment.</u>		
DMMod49	Policy DM22	Amend Policy DM22 Part C(b) to read: b. All major development located within 500 metres of an existing DE Network, and minor new-build development located within 25 metres, will be expected to secure connection to that network <u>subject to demonstration of technical feasibility and financial viability.</u>	S3 This is a formatting modification which clarifies requirements already included in the policy.	S3
DMMod50	Policy DM22	Amend Policy DM22 Part C(c) to read: c. All major development located within 500 metres of a planned future DE Network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be expected to secure connection to that network <u>subject to demonstration of technical feasibility and financial viability.</u>	S3 This is a formatting modification which clarifies requirements already included in the policy.	S3
DMMod51	Policy DM22	Delete DM22 Part C(d). <u>d. Where connection to an existing or planned future DE network is expected, applicants must submit a feasibility assessment so the Council can determine whether a connection is technically feasible and financially viable.</u>	S3 This is a formatting modification made for clarity and the requirements have now been set out elsewhere in the policy.	S3
DMMod52	Policy DM23	Amend Policy DM23 Part C to read: C. Where <u>necessary</u> , adequate mitigation <u>is not must be provided</u> <u>planning permission will be refused.</u>	S3	S3
DMMod53	Policy DM23	Amend 2 nd sentence of Policy DM23 Part D to read: D. <u>Proposals for Pp</u> potentially noisy developments <u>may</u>	S3	S3

		<u>be refused if it cannot be must</u> suitably demonstrated that measures will be implemented to mitigate its impact.		
DMMod54	Paragraph 4.58	<i>Add an additional sentence at end of paragraph 4.58 to read:</i> <u>In line with London Plan Policy 7.14, the Council expects that all development should be at least 'air quality neutral'.</u>	S2	S2
DMMod55	Paragraph 4.77	<i>Add the following additional text to the beginning of paragraph 4.77 as follows:</i> <u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u>	S2	S2
DMMod56	Policy DM27	<i>Amend Policy DM27 Part D to read:</i> D. <u>The Council will refuse pP</u> proposals for new development in Source Protection Zones <u>when there would be an- must not result in an</u> unacceptable risk to groundwater quality.	S3	S3
DMMod57	Policy DM28	<i>Amend Policy DM28 Part D to read:</i> D. <u>The Council will resist pP</u> proposals <u>that would should not</u> adversely affect the natural functioning of main rivers and ordinary watercourses, including through culverting.	S3	S3
DMMod58	Policy DM33	<i>Amend Policy DM33 Part A(a) to read:</i> a. A reduction in pedestrian or highway safety; <u>or</u>	S3	S3
DMMod59	Policy DM34	<i>Amend Policy DM34 to include an additional criterion</i>	S3	S3

		<p><i>DM34 Part B to read:</i></p> <p><u>B. All proposals will be considered having regard to their impact on the historic environment, in line with Policy DM9.</u></p>	<p>The modification provides a signpost to DM9 however this would not change how the policy is expected to be implemented. The requirement would be applicable to all proposals irrespective of the cross-reference as the Local Plan needs to be considered in its entirety.</p>	
DMMod60	Policy DM37	<p><i>Amend DM37 to include a new Part B to read:</i></p> <p><u>B. Within Locally Significant Industrial Sites (LSIS), proposals for uses not within Use Classes B1 to B8 will only be supported in exceptional circumstances where the following can be demonstrated:</u></p> <p><u>a. The proposal is necessary to facilitate meeting the needs of modern industry and business; or</u></p> <p><u>b. The proposal relates to a use which supports the continued functioning of the LSIS as a predominantly industrial and commercial area; or</u></p> <p><u>c. The proposal would deliver strategic economic benefits of a borough or sub-regional scale; and</u></p> <p><u>d. The loss of the B Use Class land or floorspace would not compromise the strategic employment land requirement; and</u></p> <p><u>e. The proposal would not restrict, prevent or in any way prejudice the continued operation of adjoining or nearby established employment uses.</u></p>	<p>The sustainability effects of this modification are uncertain. The policy now provides flexibility for the introduction of non-employment uses on LSIS which, depending on the nature of use and scheme brought forward, could potentially compromise the integrity of LSIS. Crucially, the policy also sets out further criteria to ensure employment generating function of LSIS is safeguarded. This should therefore provide that there are no significant negative effects on the economic sustainability objectives. Further, the policy provides</p>	No change

			that non B-Class uses will only be supported in exceptional circumstances, thus limiting potential for this occurrence. It will be important that any loss of LSIS is carefully monitored over the plan period, consistent with the existing monitoring framework.	
DMMod61	Policy DM38	Amend title of DM38 to read: <u>Employment Led Regeneration Local Employment Area – Regeneration Areas</u>	S1	S1
DMMod62	Policy DM38	Amend DM38 Part A to read: A. The Council will support proposals for mixed-use, <u>employment-led</u> development within a Local Employment Area – Regeneration Area <u>or on a highly accessible non-designated employment site</u> where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. In addition to complying with other policy requirements, proposals must:	S3 For plan legibility, the requirements for non-designated employment sites have been moved within a modified catch-all policy for non-designated land and sites (DM40), for which SA implications have been addressed. The modification is not considered to impact on the appraisal for LEA-RA sites.	S3
DMMod63	Policy DM38	Delete DM38 Part A(a) as follows: <u>a. Suitably demonstrate that for reasons of viability a mixed-use scheme is necessary to facilitate the delivery of employment floorspace;</u>	S3 This point is covered elsewhere in the policy and the change avoids	S3

			unnecessary duplication. The modification is not considered to impact on the appraisal.	
DMMod64	Policy DM38	<p><i>Amend DM38 Part A(b) to read:</i></p> <p>b. Maximise the amount of employment floorspace to be provided within the mixed-use scheme, <u>having regard to development viability</u>;</p>	<p>S3</p> <p>Considerations for development viability are captured elsewhere in the policy and Local Plan. The modification is not considered to impact on the appraisal.</p>	S3
DMMod65	Policy DM38	<p><i>Amend DM38 Part A(c)(ii) to read:</i></p> <p>ii. Flexibility of design to enable adaptability to different business uses over the lifetime of the development; <u>and</u></p>	S1	S1
DMMod66	Policy DM38	<p><i>Amend DM38 Part A(c)(iii) to read:</i></p> <p>iii. Environmental quality of the site; <u>and</u></p>	S1	S1
DMMod67	Policy DM38	<p><i>Re-order DM38 Part A(c)(iv) to DM38 Part A(d) and amend to read:</i></p> <p><u>d. Make P</u>rovision for an element of affordable workspace where viable; <u>;</u></p>	S1	S1
DMMod68	Policy DM38	<p><i>Delete DM38 Part A(d).</i></p> <p><u>d. Investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs;</u></p>	<p>Whilst the modification removes a requirement for proposals to investigate the potential for gypsy and traveller accommodation, this does not preclude LEA-RA sites from delivering this type of development. Further,</p>	No change

			Local Plan policy SP2 sets the strategic approach for meeting identified need for gypsy and traveller accommodation, along with a criteria based policy for relevant proposals. The modification is therefore not considered to impact on the appraisal.	
DMMod69	Policy DM38	<p><i>Amend DM38 Part A(e) to read:</i></p> <p>e. Ensure an adequate separation of uses <u>appropriate standard of amenity for the development's users and neighbours</u>, particularly where new residential floorspace is introduced as part of a mixed-use scheme;</p>	S3	S3
DMMod70	Policy DM38	<p><i>Amended Policy DM38 Part A(g) to read:</i></p> <p>g. <u>Be designed to</u> enable connection to ultra fast broadband.</p>	S3	S3
DMMod71	Paragraph 6.12	<p><i>Amend 3rd sentence of paragraph 6.12 to read:</i></p> <p>In response to these issues the Council will apply a more flexible approach to the development of some employment sites, supporting <u>employment-led</u>, mixed-use schemes where they will facilitate site regeneration and renewal.</p>	S3	S3
DMMod72	Paragraph 6.13	<p><i>Amend paragraph 6.13 to read:</i></p> <p>Mixed-use redevelopment of employment land will be restricted to Local Employment Area – Regeneration Areas and other highly accessible non-designated employment sites (<u>see Policy DM40</u>). The Strategic</p>	<p>S2</p> <p>The requirements/supporting text for non-designated employment sites have been moved within a modified</p>	S2

		<p>Policies Local Plan provides the basis for a more flexible approach to development in such Regeneration Areas. Furthermore, the London Plan and Haringey's Strategic Policies require that more intensive land uses are directed to highly accessible, <u>sustainable</u> locations. <u>Mixed-use schemes proposed on non-designated employment sites will not be considered suitable if they are in areas of poor transport accessibility.</u></p>	<p>catch-all policy for non-designated land and sites (DM40), for which SA implications have been addressed. The modification is not considered to impact on the appraisal for LEA-RA sites.</p>	
DMMod73	Paragraph 6.14	<p><i>Amend 1st sentence of paragraph 6.14 to read:</i></p> <p>Applicants will be required to submit a viability assessment that clearly demonstrates that the proposed mixed-use scheme <u>is necessary to cross-subsidise and enable maximises</u> the development of employment uses.</p>	S2	S2
DMMod74	Paragraph 6.16	<p><i>Delete 2nd sentence of paragraph 6.16.</i></p> <p><u>They should therefore be considered for suitability to meet identified need for gypsy and traveller accommodation, having regard to site viability, design considerations and other relevant Local Plan policies.</u></p>	<p>S2</p> <p>The implications of the deletion of the corresponding policy are set out in the comments for Policy DM38 Part A(d).</p>	S2
DMMod75	Paragraph 6.17	<p><i>Amend 1st sentence of paragraph 6.17 to read:</i></p> <p>Where non-employment uses are introduced it is imperative that the employment and business function of the LEA <u>RA or non-designated site</u> remains intact.</p>	S2	S2
DMMod76	Policy DM39	<p><i>Amend DM39 to include a new Part A to read:</i></p> <p><u>A. Warehouse living is a specific type of land use that has emerged over time in certain employment locations within Haringey, and lends particular support to the creative industries sector. It does not fall within a</u></p>	<p>S3</p> <p>The policy is now defines Warehouse Living and makes explicit which use class it falls under. These are clarification</p>	S3

		<u>specific use class – and is not live/work development – and as such is considered a Sui Generis use.</u>	points to assist with policy implementation. The modification is not considered to impact on the appraisal.	
DMMod77	Policy DM39	<p><i>Amend DM39 Part A to read:</i></p> <p>A. The Council has made provision for proposals for warehouse living, <u>at selected Local Employment Area – Regeneration Areas</u>, within the Harringay Warehouse District as defined in the Site Allocations <u>Document DPD</u>, and the Fountayne & Markfield Road area as defined in the Tottenham Area Action Plan <u>(See Figure 6.1)</u>. <u>Warehouse living proposals will only be acceptable within these identified locations.</u></p>	<p>S3</p> <p>These changes are for clarification and plan legibility, and reinforce location criteria previously set out in the policy. The modification is not considered to impact on the appraisal.</p>	S3
DMMod78	Policy DM39	<p><i>Amend DM39 Part C to read:</i></p> <p>C. The preparation of a masterplan will have regard to <u>individual site circumstances and</u> the following matters:</p>	<p>The policy now provides assurance that masterplans will have appropriate regard to individual site circumstances, including existing authorised uses. This will help ensure effective implementation of the broader policy principles for Warehouse Living. The modification thus provides more certainty of the likely effects but does not impact on the appraisal.</p>	No change
DMMod79	Policy DM39	<p><i>Amend DM39 Part E to read:</i></p> <p>E. Proposals for warehouse living on industrial estates not identified in Part A of the policy will be resisted <u>as</u></p>	<p>S3</p> <p>The deleted text has been retained within a new</p>	S3

		<u>will proposals for Live/Work anywhere within the Borough.</u>	<p>critterion added to the policy. The modification does not therefore impact on the appraisal.</p>	
DMMod80	Policy DM39	<p><i>Amend DM39 to include an additional criterion to read:</i></p> <p><u>F. Proposals for Live/Work units anywhere within the Borough will be resisted.</u></p>	<p>S3</p> <p>This criterion incorporates text previously included elsewhere in the policy. The modification does not therefore impact on the appraisal.</p>	S3
DMMod81	Paragraph 6.20	<p><i>Amend 3rd sentence of paragraph 6.20 to read:</i></p> <p>The expected outcome is to secure a long-term sustainable economic future for these employment land sites <u>that builds on the amenity being created and complements the unique character of the areas in which they are situated.</u></p>	S2	S2
DMMod82	Paragraph 6.21	<p><i>Amend paragraph 6.21 to include an additional sentence at the end of paragraph to read:</i></p> <p><u>In preparing proposals and site masterplans, the Council expects applicants to have engaged with and sought the views of Hackney Council, particularly on sites which adjoin the Borough boundary.</u></p>	S2	S2
DMMod83	Paragraph 6.22	<p><i>Insert the following paragraph after paragraph 6.22 to read:</i></p> <p><u>For the purposes of monitoring, warehouse living development, including Lawful Development Certificates, will contribute towards Haringey's strategic housing requirement through the provision of non-</u></p>	S2	S2

		<u>conventional (non-self-contained) supply, and to the strategic employment land requirement through the provision of communal or dedicated employment floorspace.</u>		
DMMod84	DM39 supporting text	<i>Include a map identifying the relevant site allocations where provision has been made for warehouse living.</i>	S1	S1
DMMod85	Policy DM40	<i>Amend title of Policy DM40 to read:</i> <u>Loss of Non-Designated</u> Employment Land and Floorspace	S1	S1
DMMod86	Policy DM40	<i>Amend Policy DM40 to include a new Part A to read:</i> <u>A. On non-designated employment sites within highly accessible or otherwise sustainable locations, the Council will support proposals for mixed-use, employment-led development where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. All proposals for mixed-use development must satisfy the requirements of Policy DM38.A(a-g).</u>	S3 For plan legibility this criterion for non-designated employment sites has been moved from DM38, so that DM40 is a catch-all policy dealing with non-designated land and sites. The modification does not amend policy principles and therefore does not impact on the appraisal.	S3
DMMod87	Policy DM40	<i>Amend Policy DM40 Part A to read:</i> <u>B.A. Subject to other policy requirements On all other non-designated employment sites (i.e. those which do not meet the location criteria of (A) above), the loss of employment land and floorspace will only be permitted where it can be demonstrated that the building or land is no longer suitable for continued employment use having regard to:</u>	S3 The policy has been amended with additional criteria to assist with interpretation and implementation. However these do not change the overarching policy principles on loss of non-designated	S3

		<p>a. <u>feasible alternative employment uses</u> It is demonstrated that the site is no longer suitable or viable for the existing or an alternative industrial or business use; <u>and</u></p> <p>b. <u>the age and condition of the existing building(s) and the potential for refurbishment or adaptation, in particular to more flexible unit sizes;</u></p> <p>c. <u>site layout, access, and relationship to neighbouring uses;</u></p> <p>d. <u>periods of long-term vacancy</u></p> <p>e. There is clear evidence that an open and of recent, continuous and suitable campaign to <u>marketing the site,</u> covering a minimum <u>continuous</u> period of 3 years, has been undertaken without success.</p>	<p>employment land located outside of sustainable locations. The modification does not therefore impact on the appraisal.</p>	
DMMod88	Policy DM40	<p><i>Amend Policy DM40 Part B to read:</i></p> <p><u>BC. Subject to (B) above, w</u>Where the Council is satisfied that the loss of non-designated employment land or floorspace is acceptable, <u>it will require new development support will be given to</u> proposals <u>that deliver community uses either as the sole use or as part of a mixed-use development. to apply a sequential approach to delivering an alternative use through redevelopment, as follows:</u></p> <p><u>a. Strategic community infrastructure appropriate to the location;</u></p> <p><u>b. Mixed-use development that includes employment generating and/or community uses;</u></p> <p><u>c. Residential use</u></p>	<p>The removal of the proposed sequential approach may have potential to limit positive effects on social sustainability objectives, particularly those with strong links to social infrastructure (i.e. education, health, community cohesion and accessibility) as well as employment objectives. However this impact may be offset somewhat by the policy support given to proposals which deliver community uses either as the sole use or as part of mixed-use development.</p>	No change

DMMod89	Policy DM40	<p><i>Amend Policy DM40 Part C to read:</i></p> <p>C. <u>Where proposals involving the total loss of employment floorspace will be required to make a financial contribution towards employment regeneration projects, training schemes, job brokerage services or business support related initiatives may be sought,</u> in line with Policy SP9 <u>and DM 48.</u></p>	<p>S1/S3</p> <p>The modification provides more flexibility for consideration of planning obligations on individual schemes but does not alter the overall thrust of the policy objectives. Therefore the change is not considered to impact on the appraisal.</p>	<p>S1/S3</p>
DMMod90	Paragraph 6.25	<p><i>Amend 3rd sentence of paragraph 6.25 to read:</i></p> <p>Unless these sites are given protection there is a risk they will be lost to other types of development, <u>such as housing,</u> without full consideration of their potential to support other employment generating uses <u>or strategic infrastructure.</u></p>	<p>S2</p>	<p>S2</p>
DMMod91	Paragraphs 6.26 to 6.28	<p><i>Delete paragraphs 6.26, 6.27 & 6.28 and replace with the following:</i></p> <p><u>Therefore, the aim of the policy is to secure the re-provision of new employment floorspace to support local demand for a range of employment uses. Mixed-use redevelopment and changes of use can help to secure the re-provision of employment floorspace that is better tailored to meeting local demand, supported employment diversity, and maintains the vibrancy and viability of an area. On sites where it can be demonstrated that they are no longer suitable for continued employment or commercial use, it is appropriate that these be released for other forms of sustainable development, including community uses</u></p>	<p>S2</p>	<p>S2</p>

		<u>where these could help meet locally identified needs.</u>		
DMMod92	Policy DM41	<p><i>Amend Part A to read:</i></p> <p>A. Proposals for new retail, leisure and cultural uses within Metropolitan and District Town Centres, <u>and Local Centres</u>, will be supported where they:</p>	<p>S1</p> <p>This is a technical clarification which is not considered to impact on the appraisal findings. Local Centres were already signposted in the supporting text and taken to apply to the policy through the appraisal process.</p>	S1
DMMod93	Policy DM42	<p><i>Amend DM42 Part A to read:</i></p> <p>Within Primary Shopping Frontages of the Metropolitan and District Town Centres, as defined on the Haringey Policies Map, the use of ground floor units for <u>retail, financial & professional services, restaurants & cafes and pubs & bars appropriate town centre uses</u> will be permitted where:</p>	<p>The policy now refers ‘appropriate town centre uses’ consistent with the definition set out in national policy. The uses specified in the deleted text all fall within this definition. The change will provide for a wider range of acceptable uses in centres (including but not limited to the main uses specified) which is likely to positively impact on town centre vitality and viability. However such positive effects were already demonstrated through the baseline appraisal and no further significant effects are expected to result from the modification.</p>	No change
DMMod94	Policy DM46	<p><i>Amend DM46 Part A to consolidate with Part A(a) to read:</i></p>	<p>S1</p>	S1

		A. Proposals for betting shops will only be permitted where they are appropriately located within the Metropolitan Town Centre, a District Town Centre or Local Centre, having regard to Policy DM42 (Primary and Secondary Frontages) and DM43 (Local Shopping Centres); and.		
DMMod95	Policy DM46	<i>Delete Policy DM46 Part A(b).</i> <u>b. The total number of betting shops (including extant permissions) will not exceed 5% of the units within the town or local centre.</u>	For appraisal purposes this modification is considered alongside the other modifications for Policy DM46. The threshold approach has been deleted although the policy continues to provide a basis for managing the overconcentration of this particular type of use in town centres. The modification is therefore unlikely to have significant impacts on the baseline appraisal in terms of economic sustainability objectives. The impact on social objectives (including health) is uncertain.	No change
DMMod96	Policy DM46	<i>Amend Policy DM46 to include a new Part B to read:</i> <u>B. Proposals for new betting shops will be assessed against their impact on town centre vitality and viability, having regard to:</u> <u>a. The number of existing betting shops in the centre;</u>	For appraisal purposes this modification is considered alongside the other modifications for Policy DM46. The threshold approach has been deleted although the policy continues	No change

		<p><u>and</u> <u>b. The need to avoid overconcentration and saturation of this particular type of use.</u></p>	<p>to provide a basis for managing the overconcentration of this particular type of use in town centres. The modification is therefore unlikely to have significant impacts on the baseline appraisal in terms of economic sustainability objectives. The impact on social objectives (including health) is uncertain.</p>	
DMMod97	Paragraph 6.55	<p><i>Amend paragraph 6.55 to read:</i></p> <p>The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the <u>link between health outcomes and the proximity of betting shops. It concludes there is sufficient evidence to demonstrate that access to gambling venues, including betting shops, leads to increased gambling behaviour and that this, in turn, is associated with poor health outcomes spatial distribution of licensed betting shops in Haringey. The baseline information has since been updated using the Council's licensing data (2016), which shows a notable concentration of betting shops in town centres, particularly in Wood Green and Tottenham, when compared to elsewhere in the Borough.</u></p>	S2	S2
DMMod98	Paragraph 6.56	<p><i>Amend 1st sentence of paragraph 6.56 to read:</i></p> <p>The Council is committed to improving the health and well-being of its residents along with visitors to the Borough, <u>including by promoting development that</u></p>	S2	S2

		<u>achieves mixed and sustainable communities.</u>		
DMod99	Paragraph 6.57	<p><i>Amend paragraph 6.57 to read:</i></p> <p>The Council considers that the <u>five percent threshold allowance for betting shops in town centres approach</u> is reasonable to support economic development and demand for this use, whilst protecting against the adverse impacts that an overconcentration of betting shops can have on the vitality and viability of town and local centres. <u>This includes impacts on: the overall quality and diversity of the centre’s retail offer, including provision for a range uses that encourage linked trips; the continuity of uses in frontages, consistent with other plan policies; local character, townscape and public realm, particularly where there is a need to ensure active frontages; and community safety.</u></p>	<p>S2</p> <p>This modification sets out implementation points to correspond with modifications to the Policy DM46, for which sustainability considerations are included above.</p>	S2
DMod100	Figure 6.1	<i>Delete Figure 6.1 “Healthy Eating Zones”.</i>	<p>S1</p> <p>Figure 6.1 was included for illustrative purposes only (i.e. the figure is not a policy in its own right) representing the extent of the proposed 400m hot food takeaway exclusion zone in DM47. The modification does not therefore impact on the appraisal – see other SA comments on DM47 (DMod101) for appraisal findings.</p>	S1
DMod101	Policy DM47	<i>Delete Part A of Policy DM47:</i>	For appraisal purposes this	No change

		<p><u>A. The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school.</u></p>	<p>modification is considered alongside the other modifications for Policy DM47. The policy continues to provide a basis for managing the spatial distribution of this particular type of use, but now applies a ‘town centre first’ approach. The modification is likely to result in positive effects on economic sustainability objectives when considered with the full suite of policy criteria (i.e. those which also prevent the negative clustering of uses in centres). Impacts on social objectives (including health) are uncertain.</p>	
DMMod102	Policy DM47	<p><i>Amend Part B of Policy DM47 to read.</i></p> <p><u>B Subject to (A) above, proposals for hot food takeaway shops should be located within town centres and will only be permitted where:</u></p> <ul style="list-style-type: none"> <u>a. The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres;</u> <u>b. Within neighbourhood parades, other non-designated frontages and elsewhere in the borough, it is suitable. It can be demonstrated</u> 	<p>For appraisal purposes this modification is considered alongside the other modifications for Policy DM47. The threshold approach has been deleted although the policy continues to provide a basis for managing the overconcentration of this particular type of use in town centres. The modification is therefore unlikely to have</p>	No change

		that the proposal will not result in an overconcentration <u>or excessive clustering</u> of hot food takeaways <u>having regard to the existing number of hot food takeaways within the centre or frontage</u> ;	significant impacts on the baseline appraisal in terms of economic sustainability objectives. The impact on social objectives (including health) is uncertain.	
DMMod103	Paragraph 6.59	<p><i>Amend paragraph 6.59 to read:</i></p> <p>The Public Health Directorate has published a health evidence base, <u>which, along with Hot Food Takeaway Shops: An Evidence Base Study (2015) to has informed</u> preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The evidence identifies <u>a correlation between the distribution of hot food takeaways in Haringey and levels of overweight and obese children that there are approximately 170 hot food takeaways</u> across the Borough. <u>The concentration of hot food takeaways per 100,000 head of the population in Haringey was judged by the National Obesity Observatory as being in England's top quintile of local fast food outlet concentrations.</u></p>	S1/S2	S1/S2
DMMod104	Paragraph 6.60	<p><i>Amend the 1st sentence of paragraph 6.60 to read:</i></p> <p>In light of the above evidence base, it is considered appropriate for the Local Plan to seek to manage the development of hot food takeaways, particularly around primary and secondary schools where they pose a significant health risk to children to deliver mixed and sustainable communities, including viable town and local centres.</p>	S2	S2
DMMod105	Paragraph 6.61	The Council considers that the <u>five percent threshold allowance for hot food takeaways in town-centres</u>	S2	S2

		<p><u>approach</u> is reasonable to support economic development and demand for this use, whilst protecting against the adverse impacts that an overconcentration <u>or excessive clustering</u> of <u>this use hot food takeaways</u> can have on the vitality and viability of town and local centres and <u>other shopping frontages</u>. <u>This includes impacts on: the overall quality and diversity of the centre’s retail offer, including provision for a range uses that encourage linked trips; the continuity of uses in frontages, consistent with other plan policies; local character, townscape and public realm; environmental quality; public amenity; and community safety.</u></p>	<p>This modification sets out implementation points to correspond with modifications to the Policy, for which sustainability considerations are included above.</p>	
DMMod106	Paragraph 6.62	<p><i>Delete paragraph 6.62</i></p> <p><u>To assist with the implementation of this policy, the Council has mapped a “Healthy Eating Zone” (Figure 6.1) which reflects the extent of the 400 metre exclusion area around schools for hot food takeaways. This map may be revised over time to reflect changes in education provision across the Borough.</u></p> <p><i>and replace with the following paragraph:</i></p> <p><u>The Council considers that hot food takeaways are most appropriately located in town centres, in line with the NPPF ‘town centre first’ approach, where activity levels are generally higher and there is greater potential for linked trips. Hot food takeaway shops often attract a significant number of customers and by virtue of their operation, are commonly associated with environmental and amenity issues such as litter, waste disposal, fumes and noise. Planning conditions may be used to ensure there are no adverse impacts on the</u></p>	<p>S2</p> <p>This modification sets out implementation points to correspond with modifications to the Policy, for which sustainability considerations are included above.</p>	S2

		<u>local area.</u>		
DMMod107	Policy DM48	<p><i>Amend Policy DM48 as follows:</i></p> <p>A. <u>Planning obligations will be sought on a scheme-by-scheme basis having regard to the relevant policy requirements of the Local Plan, development specific impacts, appropriate mitigation, viability, and the statutory tests for the use of planning obligations.</u></p> <p>B. <u>The following is a list of some areas where the Council may seek planning obligations. Other types of obligations may be necessary to mitigate site specific impacts:</u></p> <ul style="list-style-type: none"> - <u>Affordable Housing</u> - <u>Transport and Highways</u> - <u>Employment and Skills Training</u> - <u>Amenity Space</u> - <u>Open Space</u> - <u>Children’s Play Space</u> - <u>Public Realm</u> - <u>Public Art</u> - <u>Sustainable Design and Construction</u> - <u>Carbon Reduction</u> - <u>Decentralised Energy Networks</u> - <u>Biodiversity</u> - <u>Flood Risk</u> - <u>Utilities</u> - <u>Historic Environment</u> - <u>Community Safety</u> 	S1/S3	S1/S3
DMMod108	Paragraph 7.21	<i>Amend paragraph 7.21 Part iii to read:</i>	S2	S2

		Suitable marketing activity of the business as an on-going concern over the past 12 months, <u>as demonstrated through evidence of an unsuccessful campaign to market the site for the existing use at terms which are appropriate to the local economic area (including details of commercial agents, adverts in publications and lease terms offered to existing or previous occupants)</u> ; and		
DMMod109	Policy DM55	<p><i>Amend Policy DM55 Part B to read:</i></p> <p>B. In preparing their proposals and the wider site masterplan, the Council expects the applicant to have engaged with and sought the views of the landowner(s) and occupiers of the other part(s) of the allocated site and, where appropriate, neighbouring properties <u>and boroughs</u>.</p>	S3 The policy seeks to engage stakeholders as appropriate on the preparation of site masterplans. The inclusion of other boroughs as relevant stakeholders strengthens the approach, however the modification is not considered to have a significant impact on the baseline appraisal.	S3
DMMod110	Policy DM55	<p><i>Amend Policy DM55 to include a new Part C to read:</i></p> <p><u>C. In the interim period where a masterplan is to be prepared but has not come forward as part of a planning application, proposals must demonstrate that they will not compromise delivery of the outcomes sought by the site allocation.</u></p>	S3 The modification clarifies expectations in respect of site masterplanning. The change is likely to have significant positive effects across all sustainability objectives, as it will help ensure certainty on the delivery of strategic outcomes.	S3
DMMod111	Paragraph	<i>Insert the following sentence after the third sentence of</i>	S1/S2	S1/S2

	7.71	<p>paragraph 7.71 and include the monitoring table (provided at the end of this schedule) at the end of paragraph 7.71:</p> <p>The exception is monitoring of the Warehouse Living Policy DM39 for which the monitoring framework is provided below.</p>		
DMMod112	Appendix F Glossary of Terms	<p>Amend definition of Warehouse Living to read:</p> <p>Purpose built and genuine integrated, communal working and living accommodation specifically targeted at the creative industries sectors. This development typology does not fall within a specific Use Class and is considered a Sui Generis use.</p>	S1	S1
Minor Modifications				
Modification Reference	Policy / Para / Page	Description of Change	SA Screening	HRA Screening
DMMinor1	Paragraph 2.16	<p>Amend last sentence in paragraph 2.16 to read:</p> <p>Transport for London's (TfL) Streetscape Guidance (2009) (2015) provides guidance for use on TfL roads the Transport for London Road Network (TLRN).</p>	S1/S2	S1/S2
DMMinor2	Policy DM5	<p>Amend Part B of the Policy DM5 to read:</p> <p>B. Obstructions to the Locally Significant Views should be minimised and will be assessed by the Council on their level of impact on the views.</p>	S1	S1
DMMinor3	Figure 2.1 & Appendix A pg 84 & Table 5 Site Allocations pg 162	<p>Figure 2.1 to be amended, including the Key to provide accurate number referencing.</p> <p>Consequential amendments are required to the Schedules of views in Appendix A (DM DPD) and Table 5 (Site Allocations) to be amended and updated to ensure the</p>	S1	S1

		<i>numbering is in line with Figure 2.1.</i>		
DMMinor4	Paragraph 2.35	<p><i>Amend Paragraph 2.35 to read:</i></p> <p>There are a number of views included in the Council's Conservation Area <u>Appraisals and</u> Management Plans that proposals should have regard to in order to positively respond to local character.</p>	S1	S1
DMMinor5	Paragraph 2.51	<p><i>Amend the first sentence of the paragraph 2.51 to read:</i></p> <p>Shop fronts with poor quality materials, <u>bulky and crudely attached, fully</u> internal illuminated box fascias ...</p>	S2	S2
DMMinor6	Paragraph 2.53	<p><i>Amend the first sentence of the paragraph 2.53 to read:</i></p> <p>Poorly designed or <u>brightly excessively bright</u> illuminated shop fascias ...</p>	S2	S2
DMMinor7	Paragraph 2.58	<p><i>Amend the second sentence to read:</i></p> <p>The level of detail provided in the statement should be proportionate to the <u>agreed</u> importance of the asset, having regard to its significance and potential impact on this.</p> <p><i>And in the last line of the paragraph insert '<u>Area</u>' between 'Conservation' and 'Advisory'</i></p>	S2	S2
DMMinor8	Policy DM9	<p><i>Amend Policy DM9(D) as follows:</i></p> <p>"... provided they are compatible with and/or <u>compliment complement</u> the special characteristics ..."</p>	S1	S1
DMMinor9	Policy DM9	<p><i>Amend Policy DM9 Part F(d) to read:</i></p> <p>d. Extensions are restricted to less significant parts of the building, relate sensitively to the original building and <u>do</u> not adversely affect the internal or external appearance</p>	S1/S3 The policy now clarifies that considerations for internal appearance or character	S1/S3

		or character of the listed building, curtilage or its setting.	apply to listed buildings. The modification does not impact on the appraisal.	
DMMinor10	Paragraph 2.76	<i>Amend paragraph 2.76 to read:</i> Applicants should seek advice from, and the Council will consult, GLAAS (Greater London Authority Archaeological Service) and, where appropriate , Historic England in all applications...	S2	S2
DMMinor11	Policy DM18	<i>Amend Part A of the Policy to read:</i> A. Householder extensions to existing basements, or and the construction of new basements, including in existing dwellings...	S3	S3
DMMinor12	Policy DM18	<i>Amend Policy DM18 Part A(b) as follows:</i> b. Does not increase flood risk to the property and nearby properties from any source (See Policy DM24)	S3	S3
DMMinor13	Policy DM22	<i>Amend Policy DM22 Part B(b) as follows:</i> b. All development that incorporates site-wide communal energy systems should optimise examine opportunities for extending such systems ...	The policy now reflects that proposals will only be assessed on the basis of development proposed within the subject site boundary. However the principle of the policy is retained, in that it still provides that proposals give consideration to DE network opportunities where practical and feasible. The modification is not considered to impact on the appraisal findings.	No change

DMMinor14	Paragraph 4.59	Amend paragraph 4.59 to read: “The GLA and London Council’s Best Practice Guidance on Mayor’s ‘The Control of Dust Emissions from Construction and Demolition’ SPG (2014) should be...”	S1	S1
DMMinor15	Policy DM24	Amend Policy DM24 Part B(d) to read: d. Contribute to naturalising watercourses where opportunities arise, in line with Policy DM28 (Watercourses and Flood Defences) .	S3	S3
DMMinor16	Policy DM24	Amend Policy DM24 Part C (a) to read: a. Manage and reduce surface water run-off, in line with Policy DM25 (Sustainable Drainage Systems) and Policy DM26 (Critical Drainage Areas);and	S3	S3
DMMinor17	Policy DM24	Amend Policy DM24 Part C(b) to read: b. Manage water and waste water discharges, in line with Policy DM29 (On-site Management of Waste Water and Water Supply) .	S3	S3
DMMinor18	Policy DM30	Amend Policy DM30 as follows: “..... that any impacts caused by the operation of the facility can be controlled to achieve levels that such that the facility will not have a significant adverse effect on human health and the environment in line with regulatory requirements. ”	S3	S3
DMMinor19	Policy DM34	Amend Policy DM34 Part A to read: A. Where planning permission is required, t The Council will only permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained. All proposals must appropriately	S3 The modification reflects that some development would not be captured by the policy owing to Permitted	S3

		manage flood risk in line with other plan policies . Any hard standing should seek to improve drainage and reduce flooding through incorporate the use of a permeable material.	Development rights. However this would not affect how the policy would be implemented on applicable development.	
DMMinor20	Policy DM45	<i>Amend the title to Policy DM45 to read:</i> Maximising-Optimising the Use of Town Centre Land and Floorspace	S1	S1
DMMinor21	Policy DM45	<i>Amend Policy DM45 Part A to read:</i> A. The Council will seek to maximise optimise the use of land...	The policy now seeks the optimal use of land rather than maximum use (i.e. quantum). The change is considered to present a more sustainable framework for development and is likely to have minor positive effects on the sustainability objectives overall, particularly for the 'town-centres' topic within the economic sustainability objectives.	No change
DMMinor22	Policy DM47	<i>Amend DM47 Part C to read:</i> C. The Council may impose apply conditions on any planning permission granted for a hot food takeaway to ensure appropriate control over management of noise, vibration and odours, waste management, hours of operation and community safety.	S3	S3
DMMinor23	Paragraph 7.34	<i>Amend the reference in the first sentence to refer to Policy DM 55 and not DM56, and the last sentence to refer to Policy DM56(A) and not DM56(B).</i>	S1	S1
DMMinor24	Paragraph 7.35	<i>Amend the reference to 'Crossrail' in the 2nd last sentence of Paragraph 7.35 to refer to 'Crossrail 2'.</i>	S1	S1

DMMinor25	Paragraph 7.70	<i>Fourth line to be amended as follows:</i> ... Table 1 7.1	S1	S1
DMMinor26	Paragraph 7.71	<i>Insert the following sentence after the third sentence of paragraph 7.71 and include the monitoring table (provided at the end of this schedule) at the end of paragraph 7.71:</i> The exception is monitoring of the Warehouse Living Policy DM39 for which the monitoring framework is provided below.	S2	S2
DMMinor27	Page 82	<i>Paragraph numbering does not continue accurately from the previous page. Amend to ensure correct numbering.</i>	S1	S1
DMMinor28	Appendix A	<i>Second line to be amended as follows:</i> ... Figure 2.3 2.1	S1	S1
DMMinor29	Appendix A	<i>Amend Appendix A 'Schedule of Locally Significant Views' to include coordinates indicating origin points of the views.</i>	S1	S1
DMMinor30	Appendix E	<i>Include in Appendix E the "Open Space and Recreational Standards SPD"</i>	S1	S1
DMMinor31	Appendix F Glossary of Terms	<i>Amend the definition for self build housing as follows:</i> Self-Build and Custom Housebuilding Housing : As defined in the Community Infrastructure Regulations (Amendment) 2014 Self-build and Custom Housebuilding Act 2015, as amended by the Housing and Planning Act 2016, means the building or completion of a house or houses by an individual or an association of individuals for their own occupation. A dwelling built by a person (including where built following commission by a person, and occupied by a	S1	S1

		person as the person's sole or main residence.		
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Modifications (Table)

Appendix A: Schedule of Locally Significant Views (See Modification Reference DMMinor29)

Ref	View/Description	Easting	Northing
1	Alexandra Palace - - - > Central London (City and St Paul's) Panorama Strategic view	529595	189954
2	Twyford Avenue - - - > across Fortis Mere School playing fields to Enfield Panorama Local view	528103	189740
3	Alexandra Palace - - - - > to Highgate Ridge Panorama Local view	529513	189902
4	Cranley Gardens - - - - > view along street and backdrop to West Green beyond Linear Local view	528461	189139
5	Parkland Walk, bridge over St James Lane - - - - > Crouch End valley, ridge and central London landmarks beyond Linear Local view	528824	189403
6	Archway Road north - - - - > Archway Bridge Linear Local view	529197	187243
7	Archway Road south - - - - > Archway Bridge Linear Local view	529088	187452
8	Ferme Park Road at junction of Ridge Road - - - - > Alexandra Palace Linear Local view	530719	188157
9	Ridge Road at junction of Denton Road - - - - > Alexandra Palace Linear Local view	531045	188248
10	Alexandra Park Road at junction Curzon Road and Windermere Road - - - - > to Enfield and Lea Valley Linear Local view	528783	190382
11	Alexandra Palace - - - > Broomfield Park and beyond Panorama Local view	529779	190212
12	Hampstead Lane - - - - > view along the lane and towards Highgate village – glimpses between buildings Townscape Local view	527981	187504
13a	Highgate Hill - - - - > view south towards Emirates and Central London Linear Local view	528674	187340
13b	Highgate Hill - - - - > view south towards Emirates and Central London Linear Local view	528742	187314
14	Alexandra Palace - - - - > Crouch End Ridge line Panorama Local view	529651	190010
15	Station Road, New Southgate - - - > Alexandra Palace Linear Local view	528625	192382
16	Broomfield Park - - - > Alexandra Palace Linear Local view	530245	192965
17	Bounds Green Road railway bridge - - - > Alexandra Palace Linear Local view	530146	191275
18	Devonshire Road, corner of Devonshire Hill Lane - - - > Alexandra Palace Linear Local view	532435	191605

19a	Lordship Lane at Bruce Castle - - - > Alexandra Palace Linear Local view	533498	190620
19b	Lordship Lane at Bruce Castle - - - > Alexandra Palace Linear Local view	533433	190606
19c	Lordship Lane at Bruce Castle - - - > Alexandra Palace Linear Local view	533355	190592
20	Watermead Way railway bridge - - - - > Alexandra Palace Linear Local view	534561	190028
21	Downhill Park Road - - - - > Alexandra Palace Linear Local view	532438	189723
22	Adams Road - - - - > Alexandra Park Linear Local view	532791	190244
23	Alexandra palace - - - - > from corner of Seven Sisters Road, Amhurst Park and Eade Road Linear Local view	532679	187886
24	View along Inderwick Road Townscape Local view	530589	188751
25	View along Nelson Road Townscape Local view	530505	188736
26	Queenmore Road, Stapleton Hall Road junction - - - > Seven Sisters and Hale Village Linear Local view	531429	188242
27	Tottenham High Road - - - - > view along the road from Tottenham Green to Apex House Townscape Local view	533712	189376
28	Tottenham High Road - - - - > view along the road from High Cross Monument to Bruce Grove Station Townscape Local view	533777	189569
29	Tottenham High Road - - - - > view along the road from White Hart Lane Stadium to Swells Corner Townscape Local view	533922	191058
30a	Lee Valley - - - - > from roads and foot bridges over railway north and south of Tottenham Hale Panorama Local view	534739	189456
30b	Lee Valley - - - - > from roads and foot bridges over railway north and south of Tottenham Hale Panorama Local view	534739	189456
31a	Lee Valley - - - - > from Chalk Bridge over Lee navigation Panorama Local view	535689	191466
31b	Lee Valley - - - - > from Chalk Bridge over Lee navigation Panorama Local view	535636	191469
32	Lee Valley north- - - - > from Blackhorse Lane (Waltham Forest) Panorama Local view	535284	189299
33a	White Hart Lane Stadium - - - - > from Northumberland Park Road and unfolding from Down Park Lane Linear and Townscape Local view	534120	191486
33b	White Hart Lane Stadium - - - - > from Northumberland Park Road and unfolding from Down Park Lane Linear and Townscape Local view	534790	191055
33c	White Hart Lane Stadium - - - - > from Northumberland Park Road and unfolding from Down Park Lane Linear and Townscape Local view	534274	191058
34	White Hart Lane Stadium - - - - > from Bruce Castle Park northern side and along Church Lane Linear and Townscape Local view	533428	190975
35	Views across open spaces of Tottenham Cemetery Panorama Local view	533012	191310
36	St Ann's Church - - - - > unfolding from St Ann's Road Townscape Local view	532674	188650

37a	St Ignatius' Church - - - > from South Tottenham Station along Tottenham High Road Townscape Local view	533624	188555
37b	St Ignatius' Church - - - > from South Tottenham Station along Tottenham High Road Townscape Local view	533691	188000