

Response to Haringey's consultation draft Core Strategy (part of the Local Development Framework)

Preamble

The Core Strategy draft represents a major step forward from the current UDP policies. However, since the UDP was adopted our knowledge of the threat of climate change has greatly increased. The Council has recognised the overriding urgency of this when on 19 October 2009 it unanimously agreed to set a target to reduce CO₂ emissions from the borough by 40% by 2020.

This vote was, it is true, after the consultation on the key issues had taken place. But it would be ridiculous and bureaucratic to allow this to be a barrier to reflecting this policy in the Core Strategy – and everything that flows from it. The Council should be bold, and adopt the strongest policies to help achieve this target; as well as to adapt to the climate change that is already inevitable.

Issue	Page/ paragraph reference	Proposed change	Reason
Aviation growth	1.2.5	Add " <i>While passenger numbers may increase, the second runway now looks unlikely – and certainly not desirable, if we are serious about climate change.</i> "	Aviation growth makes it harder to achieve CO ₂ reduction. And the 2 nd runway at Stansted has now been dropped.
Haringey's environment	1.3.1	Add <ul style="list-style-type: none"> • "<i>Haringey's CO₂ emissions in 2007 were xxxxx(from NI186)</i> • <i>Parts of Haringey are at risk in the long term from sea-level rise if climate change is uncontrolled</i> • <i>Haringey has significant air quality problems</i>" 	Our CO ₂ emissions are the biggest issue and should be mentioned (using NI186 data). Tottenham is low-lying area – vulnerable to both fluvial flooding and sea-level rise Air quality is mentioned elsewhere and should be highlighted here.
Haringey's transport	1.3.1	Add " <i>Haringey has relatively good transport – but high levels of congestion and a large number of short journeys made by car</i> "	Congestion is a real issue, and while some of it is caused by through-traffic, much of it motorists making short local journeys.
Haringey at a glance	1.3.2 and following	a) Make these sections consistent – eg if average income and life expectancy are given in one, mention them in all. b) Opportunities for CHP and decentralised energy should be included in Crouch End, WH Lane, Wood Green and St Ann's c) Muswell Hill should include reference to Low Carbon Zone	This would make the comparisons more meaningful. Potential developments at Hornsey Town Hall, Spurs, Heartlands and St Ann's Hospital all offer chance to build CHP/DE The Low Carbon Zone is a significant development that helps point the way to the future.
Population growth	1.4.2 Challenges facing	Before "By 2026", insert: " <i>The council will explore the predictions on population growth in</i>	The draft presents population growth as a certainty which must be

	Haringey	<i>relation to sustainability. A predict-and-provide approach will make rapid increase inevitable</i> ".	accepted and provided for. This is an important assumption which should be reviewed.
Climate change	1.4.20	Rewrite first paragraph: <i>"Climate change will affect all our lives and those of future generations more drastically, with global changes having local impacts. We need to respond to this by using planning measures to help reduce our contribution to climate change, and to adapt to the changes that are inevitable, while being sensitive to the high quality environment in much of the borough. The Council has agreed a target to cut CO₂ emissions from the borough by 40% by 2020 and this is the single most important goal of this document"</i>	Existing para is confused between causes and effects. Overarching priority of climate change needs to be marked.
Transport	1.4.32	Rewrite first sentence as: <i>"Levels of car ownership and car use have risen in recent years but the rate may have slowed down"</i>	National figures show a slight drop in car ownership 2008-9, whilst it was reported to the Going Green conference in 2010 that traffic levels have not risen in the last 2 years, we think. It is important not to see continual growth as inevitable.
Vision for Haringey 2020	1.5.4	See proposed rewrite attached below	Need to put low carbon economy at heart of vision.
Climate change	1.5.6 Objective s – an environmentally sustainable future	Change first one to <i>"To limit climate change by reducing CO₂ emissions in Haringey"</i> After "Haringey Heartlands" add <i>"and other places across the borough as opportunities allow"</i>	The existing text implies we can deal with climate change just within Haringey. Work is already under way to identify other locations for decentralised energy hubs.
Map	Figure 2.1	Add decentralised energy hubs at St Ann's, Spurs, Hornsey Town hall etc	
Housing targets	2.1.2	Remove reference to 11,195 homes	See ref to housing targets above. Not clear why we need 11,195 new homes by 2026.
Managing growth	SP1	Rewrite first para as <i>"The council will re-assess current housing targets and focus growth on meeting local needs e.g. to tackle overcrowding. If the private sector cannot or will not provide the housing required to do this, then the council will build its own. Any significant net growth in housing to provide for exogenous</i>	We think this should at least be subject of rational discussion. This should also include a review of housing targets – what housing do we need, for whom, and what tenure? NHS has failed to provide

		<i>population increase will be subject to NHS provision of corresponding facilities.”</i>	new facilities for expanding populations at eg Tottenham Hale.
Local assessments and area action plans		These contain random bits of information. To be useful they should all contain some consistent information eg life expectancy, access to primary health care, average income, open space deficiency.	
Tottenham Hale	3.1.10 aspirations	Add <ul style="list-style-type: none"> • <i>“The Council will seek to remove bad-neighbour industries to more suitable locations</i> • <i>Most new housing being car-free to minimise extra traffic resulting from development”</i> 	The concrete crushing plant subjects residents to unacceptable noise, and blights Markfield Road. Nuisance powers cannot solve this due to “best practicable means” defence. Car-free housing (with car-clubs) can play an important role in reducing traffic and improving quality of life.
Wood Green	3.1.18 Aspirations	Amend 3 rd bullet as: <ul style="list-style-type: none"> • <i>“Protect and improve Wood Green town centre including its variety of locally- and chain-owned shops, improve their environmental performance and thus reduce their energy bills”</i> 	Existing text very vague. Need to both prevent “clone-town” and help businesses cut CO ₂ .
Northumberland Park	3.1.23	Amend first sentence to <i>“The ward includes much of Tottenham Marshes but access to it is hampered by the railway and Watermead Way.”</i>	Need to recognise the great open spaces we have but recognise real problem – which was worsened by building A1055
Northumberland Park	3.1.30 aspirations	Aspirations – add: <i>“a decentralised energy hub serving surrounding schools and eventually housing estates”</i>	For consistency
Seven Sisters	3.1.37 aspirations	Aspirations - add: <i>“a decentralised energy hub serving eventually surrounding schools and housing estates”</i> Add <i>“The council recognises strong local desire to retain the historic buildings at Wards Corner, and to protect the market activity there.”</i>	For consistency To recognise strong local feeling. Given economic uncertainty it is possible an opportunity for revised planning application may arise.
Housing	SP2	Amend as follows: <i>“1. Meets – but does not exceed – the density levels set out in the London Plan”</i>	It is reported that the council accepts applications significantly above the London Plan
Low carbon Haringey	4.1.2	Replace with: <i>“The Council has committed to reducing CO₂ emissions by 40% by</i>	This should be the overriding policy context

		<p><i>2020 by increasing energy efficiency, increasing renewable energy through decentralised energy networks across the borough and reducing fossil fuel use in transport'</i></p>	
	SP4	<p>Amend (b): <i>"From 2011 onwards all new non-residential development shall be built to at least BREEAM Excellent standard or the nationally agreed standard if higher. All new non-residential development shall be zero-carbon by 2019.</i></p> <p><i>At least 10% of developments permitted in 2011 should be zero-carbon, 25% in 2012, 40% in 2013, 60% in 2014, 80% in 2015.</i></p> <p>Amend <i>d 'policy does not need to prescribe the type of renewable energy for individual applications, but must ensure that at an early stage the range of technologies be explored. The applicant must choose the option/s that give the best environmental performance and have no adverse impacts on the surrounding area. When it is considered that achieving the stated percentage of renewable energy is unfeasible, evidence should be supplied demonstrating that the range of available technologies has been explored and why they are not technically feasible</i></p> <p>An energy statement should be submitted with the planning application explaining the approach to energy on the development.</p>	<p>BREEAM Very Good is now pretty standard, Excellent is readily achievable and should be the new benchmark. For ambitious schemes BREEAM 'Outstanding' should be the target.</p> <p>The CS must make clear that where CS standards (or those in the forthcoming SPD) and standards in BREEAM or CSH differ, the standard in the CS must apply if it is the higher standard. The London Plan required every borough to have a zero-carbon development by 2010..</p> <p>Enforcement of the 20% rule is important and requires a robust test.</p> <p>Viability test for RE – the CS needs some sort of viability test for RE, to ensure it does not all go off-site and on-site opportunities are lost. Wording required to the effect of 'policy does not need to prescribe the type of renewable energy for individual applications, but must ensure that at an early stage the range of technologies be explored and finances investigated. The applicant must choose the option/s that give the best environmental performance and have no adverse impacts on the surrounding area. When it is considered that achieving the stated percentage of renewable energy is not feasible, evidence should be supplied demonstrating that the range of available technologies has been explored. In these cases, where a sufficient case is put</p>

			forward a reduced percentage may be negotiated.' An energy statement should be submitted with the planning application explaining the approach to energy on the development.
	SP4	Re-write (d) as: <i>All new major developments and refurbishments shall include bicycle facilities and electric vehicle charging points”</i>	Haringey has so far failed. Widespread facilities are needed to encourage cycling and electric vehicles.
	SP4	Add: <i>For extensions and refurbishments: Within four weeks of the date of the commencement of the development hereby permitted or other such period as agreed by the local planning authority details of Cost Effective Energy Efficiency Measures to be carried out to the extended dwelling shall be submitted to and approved in writing by the local planning authority. These measures shall be implemented during the construction of the development, unless otherwise previously agreed in writing by the local planning authority.</i>	This is the so-called Uttlesford rule which requires people seeking planning permissions for extensions etc to carry out basic energy efficiency works on the existing building. For info on this see http://www.uttlesford.gov.uk/documents/website/Climate%20Change/Energy%20Efficiency%20Condition/epbc_uttlesford_spd_cs.pdf
	4.1.15	Of waste-to-energy schemes, Haringey should only accept Anaerobic Digestion.	
	4.1.23	New para after 4.1.23 <i>BRE website states: ‘Developers often face the dilemma of whether to refurbish or redevelop. Refurbishment is currently perceived to be the more sustainable option, but the Sustainable Refurbishment project has shown that this is not always the case.’ Developers should apply LCA (Life Cycle Assessment) tools to ensure that an objective assessment of the options is made. In the case of residential refurbishment, it can be undertaken sustainably and environmental performance maximised by applying EcoHomes XB (BREEAM Domestic Refurbishment is also being developed by the BRE).</i>	The Waste & Resources Action Programme (WRAP) has devised a recycled content toolkit that should be used at the design stage to assess how use of recycled and reused materials can be maximised. They also have a number of LCA tools for development and construction e.g. Environmental Impact of Higher Recycled Content in Construction Projects: WRAP, undated.
Water	SP5	2 nd bullet – re-write as <i>“Set targets to minimise water use and maximise rainwater and grey-water use; Illustrate how development would affect general and flash-flooding”</i> 5 th bullet amend as: <i>“Implement SUDS from strategic to site level including green roofs, to improve water attenuation, quality and amenity, and increase biodiversity”</i>	Without targets it’s hard to measure success Need to ensure SUDS addresses flooding issues but also enhances amenity and wildlife. It is not possible for the CS

		The CS states: <i>'An increase in residential and commercial developments in the growth areas of Heartlands and Tottenham Hale will increase demand for water and abstraction from rivers.'</i>	to rely on continued levels of future abstraction as it is unsustainable and because the regulatory position is changing against it.
Indicators for policies 4, 5, 6	p104	Add new bullet "Number of homes built or retrofitted to become low-carbon"	It is a key issue
Transport	SP7	Delivering action on climate change etc Amend 1 st bullet: <i>"Reduce traffic, minimise congestion and encourage low-carbon vehicles to reduce CO₂ and air polluting emissions"</i>	In the mayor's Air Quality Strategy he says that he 'will support boroughs that decide to take local action to address air quality through low emission zones or similar measures'. Perhaps some recognition of that would be useful Existing text very vague. Need to be explicit that transport has to contribute to reducing CO ₂ emissions. 21% of CO ₂ from road traffic comes from journeys under 5 miles nationally, and an even higher % in Haringey.
Transport	SP7	6 th bullet – add: <i>"and car-free housing wherever possible"</i>	Car-free is a key policy for reducing car use.
Transport	SP7	add new bullet re <i>"establishing a 20mph default limit on the borough streets"</i> New bullets: <i>"New stations or other transport hubs? E-W cycle routes? Walking routes – and improved streetscape with trees, benches, toilets"</i> .	20mph limits and improved public transport, walking and cycling are key to reducing traffic.
Traffic	4.4.8	Create new section heading for para "In common with...", called "Traffic" And amend 1 st sentence as follows: <i>"In common with many London boroughs, Haringey suffers from high traffic levels, including through-traffic on radial commuter flows and unnecessary short car journeys"</i>	Existing text blames it all on outsiders – when unnecessary short car trips probably also make up a big % of cars on our roads.
	4.4.12	The rights of way improvement plan should include the exploration of declaring other footpaths as rights of way.	
Indicators for SP7	P110	Add new bullets: • <i>"air quality – concentrations of</i>	Road traffic is main local cause of poor air quality.

		<p><i>PM10 and NO₂</i></p> <ul style="list-style-type: none"> • <i>Traffic volumes</i> 	<p>The whole of the borough is in an AQ management area. Policies that seek growth must ensure that there is no corresponding rise in traffic.</p>
Freight	P99	<p>In SP7, add <i>“The Council, in cooperation with neighbouring boroughs, will seek suitable locations for a freight distribution hub that can reduce the need for large vehicles to enter Haringey and inner London and facilitate use of smaller electric vehicles for distribution”</i></p> <p>(see also p102 2nd para)</p>	<p>The transport section says little about freight. Local freight hubs are a recognised way to reduce HGV penetration of cities. Electric vehicles are ideal for local distribution work, so reducing CO₂ and air pollution.</p> <p>There should be some recognition of the 'London lorry' idea whereby there should be a maximum weight allowed for delivery lorries in the London area, requiring firms like Tesco to tranship deliveries into smaller vehicles. (This would of course result in a greater number of vehicles but better than huge lorries congesting the streets.)</p>
Green industries	5.1.26	<p>Re-title existing paragraph as <i>“Local industry and SMEs”</i></p> <p>New paragraph <i>“The development of energy efficiency, renewable energy and electric vehicles locally will provide opportunities for local job creation, as do recycling and re-use industries This needs to be tied into local training strategies to maximise local employment.”</i></p> <p><i>‘We define green jobs as work in agricultural, manufacturing, research and development (R&D), administrative, and service activities that contribute substantially to preserving or restoring environmental quality. Specifically, but not exclusively, this includes jobs that help to protect ecosystems and biodiversity; reduce energy, materials, and water consumption through high efficiency strategies; de-carbonize the economy; and minimize or altogether avoid</i></p>	<p>Existing text says nothing about green industries despite the heading.</p> <p>NB – this crucial section of the Core Strategy should have been worked up by LBH prior to this late stage of its development</p> <p>Birmingham’s Green New Deal is developing a good model to integrate energy efficiency and renewables with training and local jobs.</p> <p>LBH’s must develop its own definition for the Core Strategy Important to say that a spatial planning strategy cannot do this in isolation, though it has a major part to play.</p> <p>Important to distinguish</p>

	<p><i>generation of all forms of waste and pollution.</i>¹</p> <p><i>Specifically:</i></p> <ul style="list-style-type: none"> • <i>Incorporate water conservation and solar water heating principles into local courses on plumbing.</i> • <i>Buildings – develop energy efficiency skills and advice on loft and cavity insulation, smart metering and renewables (including Feed In Tariffs)². Encourage more BREEAM/EcoHomes assessors.</i> • <i>Green infrastructure programme – e.g. green roofs. Financing from reduced water use, sewerage discharge (liaise with water companies) and retrofitting from s.106 and CIL (Community Infrastructure Levy).</i> • <i>Encourage and facilitate retailing by shops that recycle and re-use (including shops that repair goods) and charity shops.</i> • <i>Encourage and facilitate cycling retailers/repair shops. And qualified cycle mechanics – how many such courses are there in Haringey?</i> • <i>Car clubs - planning and allocation of spaces.</i> • <i>Local food growing and retailing – planning and allocating space via allotments, green roofs etc.</i> <p><i>How?</i></p> <ul style="list-style-type: none"> • <i>Allocate land/zones for green industries (as other London Boroughs e.g. Waltham Forest and Enfield have done in their Core Strategies)</i> • <i>Allocate land/zones for installation of low carbon energy supply</i> • <i>Allow change of use for developments undertaking green industries/services.</i> • <i>Audit numbers of firms taking action on environmental management systems or single-issue approaches (energy, waste, recycling) or signed-up to the Mayor’s Green</i> 	<p>between what LBH can do directly and indirectly? LBH should set the framework to encourage green industries via the Core Strategy of the LDF and other strategic documents such as economic development, regeneration and procurement. Contracting and adjustments to local tax raising powers also offer potential.</p>
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¹ Green Jobs: Towards decent work in a sustainable, low-carbon world. United Nations Environment Programme 2008

² ‘The Confederation of British Industry has expressed concern that sectors going green are struggling to find technical specialists, designers, engineers, and electricians.’, see reference 1.

		<p><i>Procurement Code</i> (http://www.londonremade.com/green-procurement-code). <i>Business Link, EST etc. may have local data.</i></p> <ul style="list-style-type: none"> • <i>Link initiatives to measures being developed by central government to encourage SMEs.</i> • <i>Partnerships will be key e.g. with colleges, Working Link, unions, agencies/NGOs (EST, Business Link, FoE) and employers.</i> • <i>Tighten regulation, via environmental health and local powers of EPA, on those industries in Haringey that pollute.</i> • <i>Audit and targets for green industries and services in Haringey.</i> 	
Training	SP9	<p>Add <i>“Training provision should include new industries in renewables and energy efficiency and electric vehicles which will be key local industries in future”</i></p>	See above
Clone towns	SP10	<p>Add: <i>“The Council seeks through S106 agreements etc to protect and encourage diversity of shop sizes, tenures etc to protect low-turnover but essential services eg cobblers and electrical repairs.”</i></p>	Local repair services help reduce consumption, but are often driven out by higher rent-yielding shops.
Sustainable design	SP11	<p>Amend 2nd bullet – <i>“Ensure that health, climate change, natural resources and biodiversity are protected and where possible improved by adopting sustainable design and construction techniques”</i> 4th bullet – add <i>“and design with climate change adaptation in mind eg trees for shading”</i></p>	<p>we should be aiming to improve biodiversity not just minimise impacts.</p> <p>Presumably there is or will be an SPD on sustainable design?</p>
Biodiversity	SP13 and p134	<p>Add new bullets after “Green infrastructure through”:</p> <ul style="list-style-type: none"> • <i>“Securing new open spaces and SINC’s by identifying and securing funding to purchase and enhance such sites in areas of deficiency, such that there is a net increase in provision.</i> • <i>The longer term aim must be to create corridors for wildlife across Haringey, linking up existing and new open spaces, reflecting the move towards landscape-level conservation nationally.”</i> 	<p>There are potential sites now. If housing targets are reduced as suggested earlier, then other sites could become available to meet the need identified on p134.</p> <p>Haringey Heartlands The CS states an intention to bring back brownfield land – however there are biodiversity issues attached here (which do not seem to have been picked up in the</p>

		(update allotment target?)	SA). If biodiversity is to be preserved in the face of the already inevitable climatic changes, we must do far more to allow wildlife to move and reconnect isolated populations.
	6.3.27	5 th para - Delete "ancient"	It is hard to create new ancient woodland!
Indicators for SP13	P160	Amend first bullet to "Not net loss, and potential increase, in Open Space" amend 4 th bullet to "No net loss, and possible increase, in SINC's"	We need to be ambitious to improve not just protect green space
Sustainability appraisal		6. Page 23 of the Sustainability Appraisal Report (I don't know where else this appears) says 'The Council will <u>strongly encourage</u> developers to provide or contribute towards car pool spaces ... ' It should say it " <u>requires it.</u> " 7. Page 28 of the same document says that, in certain circumstances, 'a crossover must not be provided until planning permission has been granted'. It should be say ' <i>In all circumstances.</i> '	

Vision Statement for Haringey 2026

Replace existing first, third and fourth paragraphs with:

"The successful drive to become a low-carbon borough has transformed our way of life. We all live in well-insulated homes, many of which incorporate renewable energy systems. All our major new developments are low-carbon energy hubs, and an increasing proportion of housing estates, commercial and public buildings are connecting to them. Traffic has greatly reduced, and health has massively improved, as many more people walk and cycle, but people also make fewer and shorter journeys as we tend to work, shop and play nearer home. As a result, CO₂ emissions are less than half what they were in 2005 – and falling fast.

Haringey Heartlands and Tottenham Hale are successful new mixed communities with high quality social and community infrastructure. But the pace of new house- and flat-building has slowed as population growth has slowed, and most new housing is designed to tackle the residual over-crowding problems, or to replace housing that is hard to bring up to modern energy standards. Across the borough, neighbourhoods have benefited from preserving their existing character and improving areas where required, for example through estate regeneration.

The widespread use of green roofs on new (and some existing) buildings, the creation of new open spaces and wildlife corridors means that, despite changes due to climate change, diverse wildlife is flourishing.

Haringey is a socially inclusive borough that is tackling poverty and disadvantage and reducing income differentials. The reduction in energy and water use, and the production of energy locally, means that more money is retained in our local economy. The growth of local food production

also makes a small contribution to this. Insulation and renewable energy have become important local employers and more young people are training to work in our new national energy infrastructure. The food and drink, clothing information....also form key parts....goods and services. The increasing local focus of energy and other economic activity helps to generate a virtuous circle of people identifying locally, meeting and trusting more other local people, and having pride in their area.