

London Borough of Haringey

Haringey Local Development Framework
Core Strategy Proposed Submission
Consultation Statement
May 2010



1 Introduction

- 1.1 In the preparation of the Core Strategy the London Borough of Haringey ('The Council') sought the participation of all communities, stakeholders and statutory bodies at the first two stages of its development; Issues and Options and Preferred Options.
- 1.2 The public consultation of the Proposed Submission of the Core Strategy takes place between the 10th May and the 21st June 2010. Following this a full Consultation Statement will be submitted with the Core Strategy Submission document.
- 1.3 This paper outlines the consultation procedures up to the present stage in the preparation of the Core Strategy. This is in line with the requirements of Regulation 27 of the Town and Country Planning (Local Development) (England) (Amendments) Regulations 2008 and the Council's adopted Statement of Community Involvement, February 2008.
- 1.4 The two key stages that provided the main opportunities for participation during the preparation of the Core Strategy were Issues and Options in early 2008 and Preferred Options in mid 2009.
- 1.5 The submission of the Core Strategy to the Secretary of State will include a Consultation Statement detailing all representation procedures from the various stages of consultation.

2 Consultation on the Issues and Options

2.1 The consultation on the Issues and Options document took place from beginning of February to end of March 2008. The aim of this consultation was to engage with as many individuals, communities and organisations as possible to discuss the Local Development Framework process and the specific concerns which should be addressed in the Issues and Options document. The Issues and Options set out 78 questions for consideration and these addressed the key challenges identified for Haringey. These included:

- Climate change;
- Demographic change;
- Use of resources;
- Health and well-being;
- High quality design;
- Equality and inclusion;
- Economic change;
- Technological change;
- Transport;
- Crime and safety; and
- Sub-regional issues.

2.2 A number of methods of engagement were employed during this stage of consultation to ensure every opportunity was provided for all communities, groups and individuals to participate in the consultation and to meet the Government Regulations and comply with Haringey's Statement of Community Involvement (SCI). The methods of consultation included:

- Direct mailing letters;
- Leaflets;
- Questionnaires;
- Information and documents available at Council buildings;
- Information on the Council website;
- Notification in local press;
- Online consultation tool;
- Focus groups;
- Public meetings;
- Public exhibitions;
- Steering and advisory groups; and
- Workshops and presentations.

Mail out

2.3 The consultation database which was set up for the Statement of Community Involvement (SCI), was used and expanded to ensure that as wide an audience as possible for involvement in the LDF process

and the preparation of the Core Strategy. This database is made up of government departments, public agencies, including statutory bodies, voluntary and community groups, local businesses and individuals.

- 2.4 A letter of notification was sent to all stakeholders. This contained the relevant information including dates of consultation, contact information, and the various possible methods of responding. Included with the letter was a leaflet summarising the consultation document, the purpose of the consultation and setting out the details about how to get involved in the consultation.

Media

- 2.5 A public notice was placed in the Haringey Journals, local newspapers, and the Haringey People magazine, which is delivered to every household in the borough.

Community events and engagement

- 2.6 The Issues and Options consultation took advantage of ongoing community events and meetings to raise awareness of the Core Strategy and to encourage participation in the consultation.
- 2.7 These events included the Haringey Green Fair and the International Women's Day. At these events Planning Policy officers staffed stands with information and promotion material with the aim of engaging with the community, raising awareness and understanding of the Core Strategy, and allowing opportunity for people to get involved in the consultation.

Focus groups

- 2.8 In order to consult with harder to reach groups in the community and to ensure more meaningful involvement focus groups were held. These were facilitated by consultation specialists and the Planning Policy team.
- 2.9 Planning Aid for London were commissioned in November 2008 to facilitate a workshop to explore certain key issues and options central to the preparation of the borough's Core Strategy with members of the community.
- 2.10 The issues and options were discussed within the structure of three workshops dealing with:
- Housing and Community Facilities;
 - Transport, Employment and Training; and
 - Environment, Open Space and Leisure.

- 2.11 Although attendance was less than expected, the quality of the local knowledge and understanding of the issues addressed not only at local but borough level was impressive and this is reflected in the reported findings.
- 2.12 Haringey Consult was commissioned by the Council to run a focus group to identify particular priorities of the BME communities with respect to the development of the planning policies. These priorities were then considered in the development of the Core Strategy. The topic areas discussed included the following focus areas:
- An environmentally sustainable future;
 - Managing development and areas of change;
 - Creating a safer, attractive and valued urban environment;
 - Creating a vibrant and prosperous economy; and
 - Improving health and community wellbeing.
- 2.13 The consultants ran a recruitment drive and 16 members of the public were selected from various BME communities via means of the HAVCO Members Services Directory, Haringey Consult's memberships and from a public meeting held on the 19th March 2008.

Response to the Issues and Options

- 2.14 In addition to the responses from the focus groups and community events, a total of 1,250 individual written representations were received from 53 respondents. The majority of representations were in response to the questionnaires sent to Consultees. Most responses were received via post and email, only a small number of respondents used the online consultation tool. Collective feedback from workshops and focus groups were analysed alongside the individual representations.
- 2.15 A total of 78 questions were posed during this stage which covered a broad range of topics and themes. The responses to these questions indicated which issues were of highest priority for the respondents. Where appropriate, these responses shaped the options and alternatives for the next stage of developing the strategy.
- 2.16 Following from the five spatial objectives of the Core Strategy Issues and Options Report (December 2007), four broad spatial options for the future development of the borough were identified. These options represented alternative strategies for achieving the Council's vision for Haringey and took into account comments received during public consultation.

The following options each contributed towards achieving the spatial objectives, and reflected differing directions for the spatial

development of the borough, and differing themes for sustainable growth and development. The options were:

- Option A - A borough wide spatial approach focusing on identified areas of change
- Option B – East/ Central/ West spatial approach
- Option C - Housing Led Growth
- Option D – Economic regeneration through employment growth

Following discussions with the LDF Members Advisory Group and taking on board the feedback from the Issues and Option consultation the following preferred spatial approach was agreed as the most appropriate to shape the development of Haringey up to 2026.

Core Strategy Preferred Spatial Approach
New development will be focussed throughout the borough in the identified areas of change and at other sustainable locations while recognising the character of the borough.



Potential topic areas for the development of Strategic Objectives and Policies							
Managing Growth	Environment & Waste	Employment & retail	Transport	Planning Obligations	Housing	Community Infrastructure	Design & Conservation

2.17 The following policy areas were agreed to address the key challenges facing the future development of Haringey: Managed Growth and Change, Housing, Environment, Retail, Employment, Open Space, Design, Conservation, Movement and Community Facilities.

2.18 The Issues and Options schedule of responses, including the Council’s response to comments made will be included in the full Consultation Statement, under Regulation 30, for submission to the Secretary of State.

3 Consultation on the Preferred Options

- 3.1** The Council published the Preferred Options Core Strategy titled 'A New Plan for Haringey 2011-2026' (equivalent to the Preferred Options report under the previous legislation) in May 2009 and asked for comments to be received by 30th June.
- 3.2** The document set out 12 proposed policies developed from the responses to the Issues and Options consultation. The strategic policies detailed how the Council would manage change over the next 15 years. These were as follows:
- Managing Growth;
 - Housing;
 - Environment;
 - Movement;
 - Employment;
 - Town Centres;
 - Design;
 - Conservation;
 - Green Infrastructure;
 - Health and Well being;
 - Culture and Leisure; and
 - Community Infrastructure.

Consultation Process

- 3.3** There was a comprehensive and extensive public consultation programme for this stage of the Core Strategy preparation to ensure wider engagement with the Haringey community, in line with the SCI and the Community Engagement Framework. The methods of consultation employed built on those used at the Issues and Options stage. The database was expanded to include those who had been involved at the Issues and Options stage, and in the ongoing discussions.
- 3.4** The approach taken for this consultation was flexible, accessible and proactive. Notification material was designed to be clear and concise, without any jargon. A number of workshop style events, seminars, meetings, and interactive information stalls were held to ensure wide participation and engagement throughout the borough. Each event and meeting was tailored to the specific focus group, discussing issues relevant to their interests, and consultation was interactive, with discussion groups and workshops facilitated by planning policy officers and consultation specialists.

Notification

- 3.5** All Consultees (including specific consultation bodies, government departments, general consultation bodies, resident and community groups and individuals) received a letter of notification and leaflet seeking comments on the proposed policies set out in the Core Strategy.
- A public notice, seeking the views and participation of all residents, was placed in Haringey People which was distributed to every household in the borough.
 - Public notices appeared in all local newspapers.
 - A publicity poster was placed in all key locations in the borough.
 - The consultation document was available to view in all libraries and at 639 High Road, Tottenham and the Civic Centre, Wood Green.
 - The consultation document was available to view on the Council website along with an interactive tool for submitting representations, and up to date information on the consultation programme and process.

Stakeholder Engagement

- 3.6** Discussion topics and workshops focused on the 12 policies proposed seeking local views on the content, relevance and comprehensiveness of the policies.
- 3.7** A number of representations were received via the Limehouse Consultation System, email, letter and response form.
- 3.8** A concerted effort was made to engage with hard to reach groups as well as more actively engaged groups.

Community Events

- 3.9** The policy team took the opportunity to engage with a wider audience at two local community summer events Haringey Green Fair and Tottenham Carnival.
- 3.10** There was a range of issues raised at these events, including; town centre improvements; local economic development; safety and urban design; and provision of leisure and cultural opportunities.
- 3.11** Following the success of the focus group facilitated by Haringey Consult for the Issues and Options stage of consultation, the Council commissioned the team to run a follow up focus group.
- 3.12** 16 participants, all local residents, were selected to partake in the consultation with at least two youth participants in each group.

Participants were provided with the proposal before they came to the consultation event. Haringey Consult in conjunction with the Council's brief produced a series of questions which were discussed to evaluate the community's perception and to tackle the proposal.

- 3.13** MAC Associates were commissioned by the Council to assist in wider participation with the community focusing on engaging with children and young people, and the general public. The consultation events were designed to ensure that as many people as possible were provided with the opportunity to have their say and to give their views.

Three public consultation events were held as follows:

- Saturday 13th June – Haringey Green Fair, Ducketts Common;
- Saturday 20th June - Haringey Carnival, Bruce Castle Park; and
- Wednesday 26th July - information stall and interactive questionnaires, Tottenham Green Centre.

Five focus groups were held in local schools across the borough as follows:

- Thursday 30th April - Earlham Junior School;
- Thursday 11th June - Woodside High School;
- Thursday 11th June - Park View Academy;
- Friday 12th June - Highgate Wood Secondary School; and
- Friday 12th June - St. Paul's and all Hallows School.

Community and Residents Groups Meetings

- 3.14** The team engaged with a number of community groups and residents' associations. Meetings were held with the Ladder Community Safety Partnership, the Garden Residents Association, Haringey Federation of Residents Association and Tottenham Conservation Area Advisory Committee delivering presentations and workshops on the document.

- 3.15** The issues raised related to the groups' local issues including family housing, leisure facilities and open space deficiencies, car parking issues and also, borough wide issues, including transport and accessibility, town centre management, and conservation issues.

Area Assemblies

- 3.16** All seven of the Area Assembly meetings held in May 2009 were attended by Planning Policy staff. A presentation was made at a number of the meetings, and an information stall was facilitated at all.
- 3.17** The issues discussed varied at each meeting; they included more integrated working between services; design and conservation issues; delivery of strategy and provision of infrastructure. These meetings

were a positive forum for raising awareness of the Core Strategy and establishing networks for further involvement.

Partnership Engagement

- 3.18** A number of seminars and meetings were delivered and attended, for internal and external professional bodies. Events included a Sustainable Design and Construction seminar, an RSL Forum, an Annual Housing Conference, Neighbourhood Management meeting, Haringey Policy Network meeting and the Haringey Strategic Partnership Well-being Partnership.
- 3.19** These meetings allowed for professional input and analysis of the relevant policies.

Equal Opportunities

- 3.20** The consultation process aimed to include members of the community from all six equalities strands set out in Haringey's Equal Opportunities Policy (2008).

Age

- 3.21** A school programme was rolled out across the borough to engage with young people. This involved focus group workshops with two primary schools and three secondary schools, in East, West and Central Haringey. A total of 135 children and young people participated in the focus groups held in five local schools. Additionally, the team attended the Youth Service Network event. The main issues raised by young people related to safety in their neighbourhoods; the provision of leisure facilities; and town centre development.
- 3.22** Consultation workshops for older people were carried out in partnership with Haringey Forum for Older People. The Planning Policy team and Haringey Forum for Older People committee organised a half day event which was attended by 80 delegates. A presentation introducing the Core Strategy was followed by a series of café style table discussions, facilitated by committee members and policy officers. All comments and discussion was noted and have been analysed by the Forum and by the Policy team.
- 3.23** The main issues which emerged from this group related to provision of affordable housing, catering for specific housing needs, improvement to accessibility and safety of parks and open spaces and improvement in urban design to allow ease of access.
- 3.24** The community summer festivals offered an opportunity to engage with a wide range of people of all ages.

Disability

- 3.25** All disability groups in the borough received a leaflet and letter of notification seeking comments on the proposed policies to be addressed in the Core Strategy.
- 3.26** Follow up contact was made through the disabilities equalities officer and further contact was made with the newly formed Haringey Disability First Consortium. Despite this there was no opportunity for direct engagement with specific disability representative groups.
- 3.27** The wider community consultation events offered an opportunity to engage with some residents with disabilities, namely, mobility issues and wheelchair users.
- 3.28** A number of members of the older peoples' forum had specific mobility issues and physical disabilities and communicated their concerns and ideas at the consultation event held for older people. The issues raised related to community transport; design of town centres and access to opportunities for healthier lifestyles.

Gender

- 3.29** The consultation aimed to engage with men and women equally. At the three main community events a total of 125 males and 225 females participated with the consultation. There was equal engagement throughout the consultation with both sexes with the exception of the International Women's Day, which was an event aimed at local women; and the meeting with the Charedi Community at which only two women attended along with approximately 50 men. This was due to the time the meeting was held, it was not convenient for women of the community.
- 3.30** Learning from this experience, future consultations will ensure to take account of these issues and organise meetings at more suitable times for both genders.

Race

- 3.31** The consultation was aimed at all nationalities and made every effort to include all ethnic groups.
- 3.32** Two focus groups were held specifically to engage with Black and minority ethnic residents as these groups were identified as less actively involved in planning consultations.

Religion or Belief

- 3.33** Local faith groups received a leaflet and letter of notification seeking comments on the proposed policies to be addressed in the Core Strategy.

- 3.34 A meeting was held with the South Tottenham Charedi Community, to discuss the proposed policies and issues specifically affecting the Jewish community. These issues included design of extensions and conversions, transport and accessibility.
- 3.35 Other faith groups were asked if they wished to be involved directly with the consultation but the offer was not accepted.
- 3.36 During future consultations, the planning policy team will make every effort to ensure engagement with this group, and co-ordinate times to attend their meetings and forums.

Sexuality

- 3.37 Lesbian Gay Bisexual and Transgender (LGBT) representative groups received a leaflet and letter of notification seeking comments on the proposed policies to be addressed in the Core Strategy.
- 3.38 A meeting was held with the Haringey LGBT Network to discuss the proposed policies and issues specifically affecting the LGBT community. Following this, the group submitted a formal representation. The main issues related to improving cultural businesses and networks in the borough; provision of leisure opportunities and improving community infrastructure and access to housing.

Main issues from the Preferred Options consultation

- 3.39 The number of people engaged during this stage of consultation was significantly higher than the previous stage. The majority of participation took place through workshops, focus groups, information stalls, public meetings, seminars and presentations which equated to approximately 650 people. All notes and feedback from these events were fed into the development of the pre-submission stage. A total of 55 written responses were received, equating to 600 comments.
- 3.40 The main issues raised related to the need for more local distinctiveness in the policies and supporting text; more evidence to back up the policies; and the need for specific targets to be included in the policies to ensure high standards in environmental design, housing provision, and sustainable development.
- 3.41 Representations and comments were taken account of where appropriate and relevant.
- 3.42 The main strategic issues raised throughout the consultation are outlined below:

Proposed Policy	Response
SP1 Managing Growth	<ul style="list-style-type: none"> • The policy should include details of scale and extent of developments, with reference to housing, employment and retail figures • Concerns about Central Leaside Area Action Plan. A broad outline of the scale and type of development should be set out in the Core Strategy given the importance of the area in development terms. • The policy should refer to type and scale of infrastructure required in growth areas • The document should include an additional policy to address planning obligations.
SP2 Housing	<ul style="list-style-type: none"> • The policy should include density and housing capacity figures and details of affordable housing viability and tenure mix. • The policy should refer to the provision of all housing types to meet local needs. • There is a need to include another policy in the Strategy referring to the needs of Gypsies and Travellers.
SP3 Environment	<ul style="list-style-type: none"> • The policy should set targets for climate change and mitigation beyond minimum standards. • The policy should include more specific details on water bodies, especially the River Lee, in terms of flood protection, water pollution, and water conservation. • More evidence is needed to support the policy, such as sequential tests, a Surface Water Management Plan, and energy plan
SP4 Movement	<ul style="list-style-type: none"> • The policy should set a reduction target for traffic in line with CO2 target. • The policy should include more detail on improvements to local transport services and linkages. • The policy should require Construction Logistic Plans (CLPs) and Delivery and Servicing Plans to be co-ordinated with travel plans.
SP5 Employment	<ul style="list-style-type: none"> • The policy should identify how employment land will be protected from change of use, specifically housing. • The policy should provide more detail on how it will encourage mixed use development to improve job creation. • The policy should include evidence to support local employment needs and make policy Haringey

	specific.
SP6 Town Centres	<ul style="list-style-type: none"> • The policy should specifically identify the town centres which will be improved. • The policy should encourage a more flexible approach to A2 uses in town centres. • The policy should be expanded to include the scale of development with specific reference to the most suitable locations in the town centres.
SP7 Design	<ul style="list-style-type: none"> • The policy should make reference to the role of design in flood management, fire risk, and mitigation of the adverse effects of noise • More evidence is needed to support the development of tall buildings • The policy should make specific reference to Lifetime Homes, Wheelchair provision, Secured by Design and Code for Sustainable Homes.
SP8 Conservation	<ul style="list-style-type: none"> • The policy should be more detailed and locally distinctive, particularly in regards to strategic views • Details of Article 4 Directions should be included in the policy
SP9 Green Infrastructure	<ul style="list-style-type: none"> • The policy should make clearer the definition of green infrastructure • The policy should identify areas, actions and measures to be taken to address deficiencies and safeguard open space in the borough • There is a need to include another policy to deal with the provision of children’s play space
SP10 Health and Well-being	<ul style="list-style-type: none"> • The policy should include details of how accessibility to health and well-being opportunities will be improved • More evidence should be included in the policy to ensure it is Haringey specific. • Haringey NHS has suggested a two prong approach to this policy, to address the demands on health infrastructure; and to promote healthier lifestyles and community well-being.
SP11 Culture and Leisure	<ul style="list-style-type: none"> • The policy should identify and address areas with sports and leisure deficiencies. • The policy should refer specifically to local facilities, cultural events, uses and needs to ensure local distinctiveness.
SP12 Community Infrastructure	<ul style="list-style-type: none"> • The policy should identify the infrastructure needs for the borough in the plan period. • The policy should include targets to allow for monitoring.

3.43 The full schedule of responses, including the Council's response to the comments made, will be available with the full Consultation Statement prepared for the submission stage.

4 Preparation of the Proposed Submission document

4.1 Representations made in the previous two stages of consultation were used in the development of the policies for the Proposed Submission document.

4.2 The strategic policies included in the Proposed Submission document are as follows:

- SP1 Managing Growth;
- SP2 Housing;
- SP3 Gypsies and Travellers;
- SP4 Working towards a Low Carbon Haringey;
- SP5 Water Management and Flooding;
- SP6 Waste and Recycling;
- SP7 Transport;
- SP8 Employment;
- SP9 Improving skills and training to support access to jobs and community cohesion and inclusion;
- SP10 Town Centres;
- SP11 Design;
- SP12 Conservation;
- SP13 Open Space and Biodiversity;
- SP14 Health and Wellbeing;
- SP15 Culture and Leisure;
- SP16 Community Infrastructure; and
- SP17 Delivering and Monitoring the Core Strategy.

4.3 Further meetings regarding the responses to the New Plan for Haringey and the further development of the Core Strategy took place with key consultees and internal officers during the preparation of the Proposed Submission Core Strategy document. This included meetings with the Haringey Strategic Partnership themed boards, Haringey NHS, the JSNA, the Corporate Policy network and internal officers from relevant services. Ongoing discussions and input from key stakeholders and internal services has contributed to the development of the Proposed Submission document.

4.4 The Council will consult on the Proposed Submission for six weeks from 10th May to 21st June 2010. This stage of consultation offers the final opportunity to comment on the final draft of the document before it is submitted to the Planning Inspector for Independent Examination in late 2010.

4.5 Representations to the Proposed Submission will relate to the two key criteria required for submission and adoption. These are the legal requirements of the Core Strategy, and the tests of soundness. During

Examination the Planning Inspector will only consider comments which refer to these criteria.

- 4.6** Comments made on the document at this stage may not result in a change but will be recorded and considered alongside the Core Strategy at Examination. This will be the last stage for representations to be made on the Core Strategy unless requested by the Inspector.
- 4.7** It is considered the process for the development of the Core Strategy Proposed Submission document has complied with the relevant regulations as well as the Council's adopted Statement of Community Involvement.

5 Conclusions

5.1 The Consultation Statement sets out the Council's approach for greater community and stakeholder participation at all stages in the preparation of the Council's Core Strategy. The engagement of the wider community in the preparation of the strategic spatial planning policies is crucial to ensure that the Core Strategy reflects the aspiration of the Haringey community and stakeholders. The process of consultation complies with Government Regulations and the Council's Statement of Community Involvement.

5.2 The Council is required to prepare a consultation statement under Regulation 30 (d) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 to set out:

- which bodies and persons were invited to make representations under Regulations 25;
- how these bodies and persons were invited to make such representations;
- a summary of main issues raised by representations; and
- how any representations have been taken into account.

This will include the schedule of responses from the three stages of consultation, and all consultation reports.

5.3 The Consultation Statement, under Regulation 30, will be prepared following the Proposed Submission consultation detailing all representation procedures from the various stages of consultation in the preparation of the Core Strategy.

Please note: all reports from the events discussed above are available from the Planning Policy team on request.