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Haringey Borough Council

Our Ref: PINS/Y5420/429/4

Date: 22nd August 2012

Dear Ms Whelehan,

Haringey Local Plan: Strategic Policies

With regard to the ongoing examination into the submitted Local Plan, I am writing to obtain your Council's view on the necessity for further SA and public consultation upon the possible modifications listed below, either when considered individually or cumulatively. These are modifications which, at this stage, I am minded to recommend to ensure the soundness of the Plan. The Inspectorate generally advises, although cannot prescribe, a six week consultation when main modifications are required which is compliant with the Regulations.

The overwhelming majority of the modifications have been proposed by the Council and relate to matters of effectiveness, justification and consistency with national policy and the London Plan. They are predominantly drawn from the Council's consolidated schedule of modifications although I draw your attention to item Number 28 on the following list which reflects more closely the content of the 2010 Core Strategy.

I must stress that these modifications are purely indicative at this stage and this letter is sent without prejudice to the content of my final report. Further evidence or commentary in relation to these modifications is not sought.

I look forward to hearing from you shortly and within the next 7 days following which a specific target for the submission of my report can be given.

Yours sincerely

Andrew Seaman

Senior Housing and Planning Inspector



INVESTOR IN PEOPLE



Report Ref	Council Ref	Page	Policy/ Paragraph	Main Modification
1	66	56 after 2.1. 10		<p>Insert new policy: Presumption in Favour of Sustainable Development</p> <p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework (NPPF). The Council will always work proactively with applicants to find solutions, which mean that proposals can be approved wherever possible and to secure development that improves the economic social and environmental conditions in Haringey. Planning applications that accord with the policies in Haringey's Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision, then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:</p> <p>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies of the NPPF taken as a whole; or</p> <p>Specific policies in the NPPF indicate that development should be restricted.</p>
2	71	59	SP1 3.1	<p>Replace second sentence of policy with the following: "The Council will maximise the supply of additional housing to meet or exceed the target of 8,200 homes from 2011-2021 (820 units per annum)."</p>
3	87 88	77	Indicators box	<p>Remove Indicators box and replace with the following paragraph: "SP1 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP1 is set out in the Council's Housing Trajectory and Appendix 4 (Infrastructure Delivery Plan)"</p>
4	94	79	SP2 3.2	<p>Delete first paragraph in SP2 and replace with the following: "The Council will aim to provide homes to meet Haringey's housing needs and to make full use of Haringey's capacity for housing by maximising the supply of additional housing to meet and exceed the target of 8,200 homes from 2011-2021 (820 units per annum)."</p>
5	95	79	SP2 3.2	<p>Delete 5th bullet point in SP2 and replace with:</p>

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				"Subject to viability, sites capable of delivering ten or more units, will be required to meet a borough wide affordable housing target of 50%, based on habitable rooms"
6	96	79	SP2 3.2	Amend 6th bullet point to read: "Delivering an affordable housing tenure split of 70% Social Rented Housing <i>Affordable Rent (including social rent)</i> and 30% Intermediate Housing"
7	99 104	80	SP2 3.2 3.2.7	<p>Para 3.2.3 amend as follows: 'The London Plan sets a London-wide target of 322,100 305,000 additional homes from 2011/12 - 2021/22 2006/07 - 2016/17 and a Haringey target of 8,200 6,800 additional dwellings (a target of 820 680 additional homes per annum).'</p> <p>Haringey produces an annual housing trajectory as part of its Annual Monitoring Report (AMR) and in line with paragraph 47 of the NPPF PPS3 Housing. The housing trajectory shows which sites are expected to come forward over the next 15 years and measures Haringey's performance in meeting its strategic housing target. For the period 2011/12 - 2026, the housing trajectory shows that the supply of additional homes is expected to be approximately 13,000. The borough's housing trajectory also demonstrates that the Council is likely to exceed the annual target of 820 units annual target (see Appendix 2) over the plan period, and is capable of bringing forward additional sites from future years to meet the requirement of an additional 5% buffer, as set out in the NPPF, to ensure future housing needs are met. In doing this, the Council will seek to enable the development of 861 new homes per year; or 5% above the Council's housing target. In addition, it is expected that over this the plan period there will be sites that come forward for housing other than those already identified. These sites are known as "windfall sites" and will contribute towards meeting the housing need in Haringey. Such sites will be assessed to ensure that they meet the needs of the community and do not harm the surrounding environment.</p>
8	105	82	3.2.8	Delete 3.2.8 and replace with the following additional paragraphs: 'The Council will expect all new development to be built to the highest quality standards, in line with the London Housing Design Guide and will assess housing densities in planning applications in line with those set out in the London Plan Density Matrix (Table 3A.2) while taking account of Haringey's urban, suburban and central density settings. Appropriate density ranges are related to setting in terms of location, existing building form and massing and the index of Public Transport Accessibility Levels (PTAL). The Council will adopt a 'design-led' approach to density.'

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9	116	83	3.2.16	<p>Insert proposed post submission change (and as detailed in Council's response to Matter 2 Issue 2.7, para 7.1) Amend second paragraph as a result of hearing discussion:</p> <p><i><u>"In order to encourage mixed and balanced communities, the Council will aim to ensure that an adequate mix of dwelling sizes is delivered within new development, while protecting existing family housing. The lack of family housing in Haringey has resulted in a significant issue of overcrowding. The demand for family housing and characteristics of overcrowding differ by tenure and ethnic origin, with some groups seven times more likely to be living in overcrowded housing than white British households (North London SHMA 2010). Low to median income households with large families are also likely to be more affected by overcrowding due to the lack of choice of available affordable family homes. Responding to these issues is a priority of the Council. Along with the provision of new and affordable housing, the Council will aim to meet the need for family housing and alleviate the problem of overcrowding through a number of other approaches such as: assisting smaller households living in overcrowded properties to find their own home; and assisting residents living in underoccupied properties to find more suitable accommodation"</u></i></p>
10	117 118	83	SP2 3.2	<p>Under sub heading In line with the NPPF, affordable housing' insert the following paragraphs: 'Affordable housing is defined as that provided to eligible households whose needs are not met by the market. Types of affordable housing include social rented, affordable rented and intermediate housing.' 'Within this definition of affordable housing The Council require a range of products and an appropriate balance of affordable housing to meet housing need in the borough. The strategic target for tenure split is currently 70% affordable rent (including social rent) and 30% intermediate affordable housing products. This is based on current evidence of housing need and affordability in the borough.'</p>
11	124	84	3.2.22	<p>Amend second sentence in 3.2.22 to read as follows: <i><u>'The Council recognises that</u></i> off-site provision misses the opportunity for creating mixed and balanced communities and will only be acceptable <i><u>in exceptional circumstances,</u></i> where the Council is satisfied..."...'</p>
	125	84	3.2.23	<p>At the beginning of the first sentence in 3.2.23 insert the following: <i><u>'Only in exceptional circumstances...'</u></i></p>
12	130	86	Indicators box 3.2	<p>Remove Indicators box and replace with the following paragraph: "SP2 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy,</p>

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				measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP2 is set out in the Council's Housing Trajectory and Appendix 4 (Infrastructure Delivery Plan)."
13	135	87		Insert the following paragraphs before the policy box SP3: 'One of the key priorities for Haringey is to provide a home for everyone in a safe environment with access to services and facilities. The Council will ensure that the needs of Gypsy and Traveller communities are met in a fair and equal way which respects their traditional and nomadic way of life. The Council will work with its partners to identify and deliver suitable sites for Gypsies and Travellers in the borough, in line with national policy and the London Plan. The Council will aim to promote appropriate and well managed sites to meet the needs of the Gypsy and Traveller communities and, to ensure integration with surrounding communities. New potential sites will be identified in the Site Allocations DPD.'
14	136	88	Indicators box 3.3	Remove Indicators box and replace with the following paragraph: "SP3 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."
15	150 149	97	SP4 4.1	Insert new paragraph after 4.1.24 to read as follows: "SP4 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP4 is set out in Appendix 4 (Infrastructure Delivery Plan)"
16	153	99	4.2.3	At the end of paragraph 4.2.3 insert the following: "Haringey will require the incorporation of water saving measures and equipment in all new development in order to meet the London Plan water consumption targets of 105l/p/d."
17	154	99		Insert additional paragraphs after 4.2.3 as follows: "Sewage Services (as heading) Haringey is served by both Beckton (Newham) and Mogden (Twickenham) main sewage treatment works. Thames Water own and manage the network of public foul and surface water sewers in Haringey and in London. Thames Water is implementing a number of Urban Waste Water Treatment Directive / Water Framework legislation-driven projects to improve the quality of water within London's rivers. These include improvements to the five largest Sewage Treatment Works (STW) discharging into the tidal reaches of the River Thames, to treat sewage to a higher standard before discharge and to fully treat more flow, as well as the proposed London Tideway Tunnels (Thames

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				Tunnel and Lee Tunnel), each of which will deal with combined sewer overflows (CSOs), and also the partial replacement of the Deephams sewage treatment works. Of significant strategic importance for London will be the proposed Lee Tunnel and the Thames Tunnel which aim to reduce the incidence of sewage discharges into the River Lee and the Thames respectively."
18	156	100		After 4.2.5 insert following additional paragraphs: "The Flood and Water Management Act 2010 brings responsibilities to local authorities for more comprehensive management of flood risk for people, homes and businesses. Haringey forms part of the Drain London Forum, a partnership including London boroughs, the Environment Agency and the Mayor of London which is formed to ensure the requirements from the Flood and Water Management Act 2010 are met in producing a Surface Water Management Plan (SWMP). The development of SWMPs include a Preliminary Flood Risk Assessment for Haringey and other the other sub-regional boroughs to investigate and address flood risk problems. Haringey will maintain a public register of Flood Risk Management assets by 2015. Following the PFRA, the council will: Finalise a Surface Water Management Plan; Prepare a Hazard Map for 2013; and Prepare a Flood Risk Management Plan for 2015."
19	158 159	100	After 4.2.6	Insert new paragraph after 4.2.6 to read as follows: "SP5 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP5 are set out in Appendix 4 (Infrastructure Delivery Plan)"
20	160	102	SP6 4.3	Delete 6th bullet point and replace with the following: "Continue working with its partners in the North London Waste Authority to adopt the Joint Waste Plan, the North London Waste Plan (NLWP) which has identified locations suitable for waste management facilities to meet the London Plan apportionment of 1.9m tonnes and the Haringey apportionment of 237,000 tonnes."
21	162 164	104	Indicators box 4.3	Remove indicators box and replace with the following paragraph: "SP6 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP6 are set out in Appendix 4 (Infrastructure Delivery Plan)"
22	168	105	4.4.1	Strategic Policy 7 focuses on promoting sustainable travel and making sure all development is properly integrated with all forms of transport, in line with the

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				Government's transport objectives set out in section 4 of the NPPF PPG13 Transport and the Mayor of London's strategic transport approach in the London Plan.
23	170	105	SP7 4.4	Amend the first paragraph of SP7 to read as follows: "In line with London Plan Policies, the Local Implementation Plan (LIP) and the Mayor's Transport Strategy, the Council will work with its partners to, The Council will promote the following key..."
24	172	106	SP7 4.4	Amend second paragraph of SP7 to read as follows: " <u>In line with the London Plan, the Council will work with its partners to,</u> The Council will promote the following travel demand..."
25	179	110		Insert new sub heading and paragraph after 4.4.19 as follows: 'The provision of transport infrastructure' "The North London Sub Regional Transport Plan published by TfL in 2010 identified the transport challenges facing Haringey and the other north London boroughs of Enfield, Waltham Forest and Barnet. The Plan identifies the measures to meet these challenges including enhanced rail and underground capacity and unfunded schemes such as the Chelsea – Hackney line and four-tracking of the West Anglia Main Line; removal of one -way Gyrotory system in Tottenham Hale, better management of the road network through, for example, management of planned events and better traffic control systems; encouraging mode shift from car to walking and cycling such as through smarter travel; improvement to interchanges at Finsbury Park and Tottenham Hale and improvements to accessibility and connectivity. Through the Council's Local Implementation Plan [Transport Strategy] investment would be made between 2011 and 2014 in our town centres of Wood Green and Green Lanes, on local safety schemes, environmental measures, cycling schemes such as Greenways and local cycle routes and smarter travel behavioural change programmes. This investment would support the predicted increases in housing and employment. Please see Appendix 3 Key Infrastructure Programme and Projects and the Council's Community Infrastructure Plan for a list of key transport improvements/infrastructure provision required to support the delivery of the Local Plan over the 15 year period. The setting of a CIL will help to marry the clearly identified needs and gaps with appropriate funding to meet any existing or projected gaps. This funding will come in part, from the future CIL for the Borough".
26	175	108	4.4.8	Delete 4.4.8 and replace with the following: "The whole of the borough of Haringey is an Air Quality Management Area (AQMA) for the pollutants of NO2 (Nitrogen Dioxide) and PM10 particulates which are the most prominent air pollutants. The dominant source of NO2 and PM10 emissions in Haringey is

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				road transport with a variety of other sources contributing emissions. This has implications for air quality which is being addressed through the measures outlined in the Council's Air Quality Action Plan. Haringey is already taking action to reduce existing pollution and to prevent new pollution. For example, monitoring has identified hotspots of poor air quality in the borough. As part of the requirements to control and reduce potential or actual pollution resulting from development in the borough, developers will be required to carry out relevant assessment and set out mitigating measures in line with the national guidance. Further detail on the Council's approach to environmental protection is set out in the Development Management DPD and the Sustainable Design and Construction SPD".
27	182 184	110	Indicators box 4.4	Remove indicators box and replace with the following paragraph: "SP7 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP7 are set out in Appendix 4 (Infrastructure Delivery Plan)"
28	-	113	Policy SP8	<p>To read as follows:</p> <p>SP8 - Employment</p> <p>The Council will secure a strong economy in Haringey and protect the borough's hierarchy of employment land, Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas.</p> <p>The Council will:</p> <ul style="list-style-type: none"> • Protect B uses (under Use Class Order) including light industry, logistics, warehousing and storage facilities to meet the forecast demand of 137,000m² floorspace up to 2026; • Support local employment and regeneration aims; • Support environmental policies to minimise travel to work; • Support small and medium sized businesses that need employment land and space; and • Contribute to the need for a diverse north London and London economy including the need to promote industry in general in the Upper Lea Valley and in particular promote modern manufacturing, business innovation, green/waste industries, transport, distribution and logistics. <p>Strategic Industrial Locations</p> <p>The Council will safeguard the following sites as Strategic Industrial Locations (SIL) as identified in the London Plan:</p> <ul style="list-style-type: none"> • Tottenham Hale; and • Part of Central Leaside

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		114	5.1.5	<p>Locally Significant Industrial Sites The Council will safeguard the following sites as Locally Significant Industrial Sites (LSIS) for a range of industrial uses (B1 (b), (c), B2 and B8) where they continue to meet demand and the needs of modern industry and business:</p> <ul style="list-style-type: none"> • Crusader Industrial Estate, N15; • Cranford Way, N8; • High Road West, N17 • Lindens/Rosebery Works, N17 • Queen Street, N17 • South Tottenham, N17 • Vale Road/Tewkesbury Road, N15 • White Hart Lane, N17 <p>Local Employment Areas The Council has identified other local employment generating sites in the borough that need protection. Local Employment Areas (LEAs) are employment sites that offer a more flexible approach to the uses on them. This category has been divided into two sub-categories: Employment Land and Regeneration Areas.</p> <ul style="list-style-type: none"> • Employment Land (EL) is land that is deemed acceptable for other employment generating uses that complement the traditional 'B' use classes, such as a small scale "walk-to-retail", cafes and creche/nursery. • A Regeneration Area (RA) is the most flexible of the categories as it can include uses appropriate in a mixed use development, such as small scale "walk-to" retail, community and residential uses. However, the approach to mixed uses in Regeneration Areas must have regard to London Plan town centre and retail policies, so not to encourage retail development outside of town centres. <p>Add an additional sentence: The hierarchy of sites will be further reviewed to take account of economic circumstances and the advice from the Mayor of London through an additional planning document such as the intended Sites Allocation DPD.</p>
29	189	115	5.1.10	Amend the first sentence of 5.1.10 as follows: "These are well established industrial areas and the aim is to retain them solely for uses that fall within B1, B2 or B8 uses. or uses that share strong similarities to this use class... "
30	195 198	120	Indicators box 5.1	Remove indicators box and replace with the following paragraph: "SP8 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."

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31	205 206	123	Indicators box 5.2	Remove indicators box and replace with the following paragraph: "SP9 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."
32	218 219	135	5.3.54	At end of paragraph 5.3.54 insert new sentence as follows: "In line with section 23 of the NPPF and the London Plan, it is the Council's intention to designate Tottenham Hale as a District Centre over the life of the Core Strategy Local Plan: Strategic Policies. Further detail regarding this designation will be set out in an Area Action Plan for Tottenham Hale".
33	221	136	SP10 5.3	Remove indicators box and replace with the following paragraph: "SP10 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."
34	222	139	SP11	Delete latter part of SP11 and replace with the following: 'Applications for tall buildings will be assessed against the following criteria: - an adopted Area Action Plan or existing adopted masterplan framework for the site and surrounding area; - assessment supporting tall buildings in a Characterisation Study which should be prepared as supporting evidence for all AAP areas; - compliance with the Development Management DPD criteria for Tall and Large Building siting and design; - compliance with all the relevant recommendations as set out in CABE / English Heritage "Guidance on Tall Buildings", 2007.'
35	234 235	141	6.1.17	Delete 6.1.17 and replace with the following: "As noted in policy SP1, the Borough will prepare Area Action Plans (AAPs) for the areas identified in Section 3.1. As part of the evidence base for each of these areas, an Urban Characterisation Study (UCS) will assess the urban character of each area concerned, including sufficient of the surrounding area to consider the context affected by the actions proposed in the AAP. These Characterisation Studies will examine the case for tall and large buildings and whether there are suitable locations within the area." After 6.1.17 insert new additional paragraphs as follows: "The Council considers that currently only two areas, Haringey Heartlands/Wood Green and Tottenham Hale, have sites that may be suitable for some tall or large buildings, because they are close to major transport interchanges, have been designated in the London Plan as an Opportunity Area

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				(Tottenham Hale) and an Area for Intensification (Haringey Heartlands/Wood Green) and have existing adopted Masterplan Frameworks . Any AAPs and associated Characterisation Studies for these areas will supersede these established suitable locations for Tall and Large Buildings with their recommended locations (if any). Elsewhere tall buildings are considered inappropriate to Haringey's predominantly 2-3 storey residential suburban character until shown otherwise in AAPs and UCSs." add 6.1.19"The Criteria for Siting and Design of Tall and Large Buildings will be described in detail in the Development Management DPD." "In all cases, the design of the tall building should comply with the recommendations contained in the CABE / English Heritage 'Guidance on Tall Buildings' (July 2007). It sets the criteria for the evaluating of proposals for tall buildings and promotes a plan led approach to tall buildings 1 The Haringey Heartlands Development Framework (adopted 2005) and the Tottenham Hale Urban Masterplan Supplementary Planning Document (adopted October 2006)"
36	236 237	141	After 6.1.17	Insert new paragraph after 6.1.17 to read as follows: "SP11 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."
37	240	142	SP12 6.2	Amend last sentence of proposed minor change to SP12 to read as follows: "All development shall protect the Strategic view from Alexandra Palace to St Paul's Cathedral <u>as protected in the London Mayoral "London View Management Framework" Revised SPG, July 2010"</u> and key local views."
38	244 245	147	Indicators box 6.1	Remove indicators box and replace with the following paragraph: "SP12 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."
39	247	149	SP13 6.3	An additional bullet to be inserted in SP13 to read: " Must conserve the historic significance of the borough's designated historic parks and gardens".
40	256	153	6.3.11	After the last sentence of this paragraph add the sentence "The Council will, through the appropriate channels, review and upgrade or remove, as appropriate, existing open land to or from MOL designation where there is evidence to support such a move". Further policy provision on MOL is provided in the DM DPD.
41	259	158	6.3.23	Amend 7th sentence to read as follows: "The Council will not permit development on SINCS and LNRs

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				unless there are exceptional circumstances and where the importance of any development coming forward outweighs the nature conservation value of the site and appropriate mitigation measures are provided. <i><u>In such circumstances, or where a site has more than one designation, appropriate mitigation measures must be taken, and where practicable and reasonable, additional nature conservation space must be provided. Each case will be looked at on its merits, having regard to all material considerations</u></i> "
42	263	160	6.3.33	Delete paragraph 6.3.33 and replace with: In particular circumstances where it is relevant and appropriate, the Council will allow the off-site provision of new facilities and/or the further development of already existing outdoor activities and facilities to meet the open space and recreational requirements of development arising from the planning application that is being considered. This off-site provision will frequently supplement the provision of new facilities/open space that have been proposed on the application site as part of the application, but where that provision is considered to be insufficient to meet the anticipated demand arising as a result of the development. Where additional demand for play space is created by new development, Haringey will expect the provision of play space on site, in accordance with the London Plan and the Mayor's SPG Providing for Children and Young People's Play and Informal Recreation".
43	264 266	160	Indicators box 6.3	Remove indicators box and replace with the following paragraph: "SP13 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP13 are set out in Appendix 4 (Infrastructure Delivery Plan)"
44	268	163	SP14 7.1	Amend second bullet point of SP14 to read as follows: "Identify appropriate sites for new health infrastructure especially within <i><u>including those in</u></i> Haringey's growth areas, based on a health service delivery plan agreed by the Council, Haringey's Strategic Partnership and health service providers and its partners
45	279	168	7.1.21	Amend 7.1.21 as follows: "The NHS estate is facing a radical overhaul to consolidate services into a hub and spoke model. The focus of the NHS restructuring also indicates a shift from hospital systems to a polyclinic type setting. This approach is still developing and the issues that arise from this shift, such as the need for more space to deal with the extra services, are currently being quantified by NHS Haringey. There is a new polysystem type Neighbourhood Health Centre (NHC) in the west of the borough (Hornsey Central) which is seen as a

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				<p>model for other such centres in Haringey. NHS Haringey is considering a similar polyclinic NHC in Tottenham. Dependent upon detailed monitoring of activity, a shift to a Tottenham NHC, both at Lordship Lane and the Laurels Neighbourhood Health Centres, could be re-graded to polyclinic spokes, providing support functions to a Tottenham polyclinic hub for residents in the east and south of the borough. It is expected that the new Neighbourhood Centres programme will be completed by 2013-14. Options under development include mix of re-developed and new primary care facilities and resource centre/s for local public health services and appropriate hospital and community care delivered closer to home. The NHS Haringey is planning continued expansion of general practice capacity and re-development of primary care premises especially in the eastern part of the borough for the reason mentioned above. The capacity increase will also consider the extension of the role of some practices that are procured to supply care in general practice settings previously provided in hospital settings due to changes in health technology and clinical practice. The most up-to-date primary care and community care related schemes which are being considered by the NHS Haringey are included in the Infrastructure Delivery Plan in Appendix 4 of the Local Plan. The LBH and local NHS will work together to keep the growth trends and the corresponding needs for health services under review as part of the monitoring work for the Local Plan, the Community Infrastructure projects and appropriate Health Plans, and utilise the monitoring of outcomes in shaping the future services in Haringey.</p>
46	281	169	7.1.28	<p>Delete last sentence of paragraph 7.1.28 and replace with the following text: "Health impacts should be considered at the very outset of developing planning proposals or strategies to ensure positive health outcomes. There are several tools available for assessing the impacts of a development. Health can be integrated into statutory assessments such as sustainability appraisal, environmental impact assessment, or a separate health impact assessment can be undertaken. For further information please see the Mayor' Best Practice Guidance on Health Issues in Planning"</p>
47	283 284	173	Indicators box 7.1	<p>Remove indicators box and replace with the following paragraph: "SP14 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP14 are set out in Appendix 4 (Infrastructure Delivery Plan)"</p>

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48	285	175	SP15 7.2	Amend SP15 to read as follows: "The Council will safeguard and foster the borough's cultural heritage and promote cultural industries and activities through <u>protecting the established Cultural Quarter at Wood Green and the development of further cultural quarters where appropriate through Area Action Plans.</u> The development of the following cultural areas across the borough: – Tottenham Green; – Tottenham Hotspur; – Hornsey Town Hall; – Wood Green/Haringey Heartlands/Alexandra Palace & Park; and – Haringay Green Lanes.
49	287	175	SP15 7.2	In SP15 and throughout Section 7.2 delete "Cultural Areas" and replace with " <u>Cultural Quarters</u> "
50	301	181	7.2.24	Delete 7.2.24 and replace with the following: "Haringey is relatively well served by a range of community facilities and infrastructure. Deficiencies in community facilities are identified in the Infrastructure Delivery Plan (IDP), from which initial findings show, for example, a potential need for a new district level combination swimming pool and leisure centre to meet the predicted population growth. Further details are set out in the Infrastructure Delivery Plan Appendix 4".
51	302 303	182	Indicators box 7.2	Remove indicators box and replace with the following paragraph: "SP15 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP15 are set out in Appendix 4 (Infrastructure Delivery Plan)"
52	317 318	193	Indicators box 8.1	Remove indicators box and replace with the following paragraph: "SP16 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3. The key infrastructure which will support the delivery of SP16 are set out in Appendix 4 (Infrastructure Delivery Plan)"
53	329	196	8.2.8	Delete 8.2.8 and replace with the following paragraphs: "The Council has developed an Infrastructure Delivery Plan schedule (Appendix 4), which sets out the infrastructure and services that are needed to deliver the Local Plan as well as other Local Development Framework documents. The schedule sets out who is responsible for delivery, funding and timescales, where these are known. It also includes a

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				<p>contingency plan where possible, should the amount of growth and locations in the borough vary, or if funding is not secured. The schedule also indicates how the identified infrastructure is linked to strategic policies.</p> <p>While the schedule is detailed, it is not exhaustive of all infrastructure likely to be needed in the borough in the plan period. Other items may be required, as appropriate, in response to new development in the borough or new emerging issues. In many cases, the confirmation of funding for infrastructure is limited to the short term, however, it is still necessary to include details of medium to long term infrastructure priorities even where funding has not yet been confirmed. To ensure that funding arrangements are fully identified and the proposed infrastructure to support growth is implemented in a timely fashion, the Council has identified a network of service providers to meet regularly to monitor the progress and keep under review the infrastructure needs and delivery of identified projects. This project list will be reviewed regularly to ensure infrastructure delivery meets Local Plan growth requirements and to accommodate any changes to the national and regional framework."</p>
54	337	199	8.2.17	<p>Delete paragraph 8.2.17 and replace with the following paragraphs: "Community Infrastructure Levy</p> <p>Community Infrastructure Levy (CIL) regulations which came into force in April 2010 is a proposed new tariff which the London Borough of Haringey intends to use to charge on most forms of new development. The planning obligations under Section 106 will be scaled back from 2014 onwards only to be used for mitigation of impacts which arise directly from the proposed development. Affordable housing obligations will still be covered by Section 106.</p> <p>The Council is currently working towards introducing a CIL rate and aim to prepare a Community Infrastructure Levy charging schedule by 2013. CIL will be closely linked to the infrastructure provision as set out in Appendix 4.</p> <p>In setting its rates, the Council will take into account various factors, including the potential effect of CIL upon the economic viability of development. The Council will also take into account the Mayoral CIL for Cross-Rail when adopted in April 2012.</p> <p>The Council monitors the Section 106 negotiations and agreements, and the outcomes are reported in the Annual Monitoring Report. The Council will develop a CIL monitoring system. The Council will also meet service providers regularly to monitor the progress of infrastructure projects and keep under review the infrastructure needs. The Council will also ensure that a process and timetable for delivery of infrastructure remains in place and that</p>

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				contributions are monitored and distributed as developments are implemented."
55	340	200	8.2.23	Delete first paragraph of 8.2.23 and replace with the following paragraphs: "Monitoring is a key component of the planning system to ensure the effectiveness of policies in meeting plan objectives. Under the Town And Country Planning (Local Development Regulations) 2004, planning authorities are required to prepare an Annual Monitoring Report. Local Plans need to be reviewed regularly to assess how well their policies and proposals are being implemented and to ensure that they are up to date. Monitoring provides the objective basis necessary for such reviews. The monitoring targets and indicators set out in Appendix 3 will be used to monitor the delivery of each strategic policy. The indicators have been specifically selected to address every policy as far as possible. All indicators and targets will be subject to periodic review through the Annual Monitoring process". Each year the Council's AMR will:
56	344	200	After 8.2.23	After 8.2.23 insert two new paragraphs as follows: "The process of annual monitoring will enable the Council to assess whether or not the objectives of the Local Plan are being met. If it is found that objectives are not being met, and the Council has explored the identified risk and contingency plans, then the Council may seek an early review of the relevant Local Plan policy. The Council have a commitment to monitor the amount of growth in Haringey and any potential impact on services. We will continue to work with our partners to ensure the critical infrastructure and services to support new growth are provided. The progress in delivery of infrastructure projects will be reviewed together with the Annual Monitoring Report. The Council will meet service providers regularly to keep under review the infrastructure needs and monitor the progress of infrastructure projects. The schedule and its update versions will also be considered as key evidence for future Development Plan Documents where the requirement for infrastructure, and priorities, would be reviewed in relation to the DPD it supports."
57	346 347	200	After 8.2.23	Insert new paragraph after 8.2.23 to read as follows: "SP17 will be monitored regularly to ensure effective delivery of its aims and objectives over the life of the Local Plan. The Annual Monitoring Report will be used to assess the performance of the policy, measured using a list of indicators as set out in Appendix 3."
58	376	N/a	Appendix 3	Insert new appendix entitled Local Plan Monitoring Targets and Indicators . This will include tables setting out monitoring targets and indicators for each strategic policy.