



The Planning
Inspectorate

Report to Haringey Borough Council

by **Andrew Seaman BA (Hons) MA MRTPI**

an Inspector appointed by the Secretary of State for Communities and Local Government

Date

PLANNING AND COMPULSORY PURCHASE ACT 2004 (AS AMENDED)

SECTION 20

REPORT ON THE EXAMINATION INTO

Haringey Local Plan: Strategic Policies

DEVELOPMENT PLAN DOCUMENT

Document submitted for examination on 28 March 2011

Examination hearings held between 28 June 2011 and 7 July 2011 with an additional hearing held 22 February 2012

File Ref: PINS/Y5420/429/4

Key Abbreviations Used in this Report

AA	Appropriate Assessment
LP/Local Plan	Haringey Local Plan: Strategic Policies
DPD	Development Plan Document
LDS	Local Development Scheme
NLWP	North London Waste Plan
NPPF	National Planning Policy Framework
PPS	Planning Policy Statement
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SCS	Sustainable Community Strategy
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SP	Strategic Policy
SPD	Supplementary Planning Document
UDP	Unitary Development Plan

Non-Technical Summary

This report concludes that the Haringey Local Plan: Strategic Policies provides an appropriate basis for the planning of the Borough until 2026 providing a number of modifications are made to the Plan. The Council has specifically requested that I recommend any modifications necessary to enable them to adopt the Plan. The overwhelming majority of the modifications were proposed by the Council, and I have recommended their inclusion after due consideration of any representations from other parties on these issues. In summary, the modifications required are necessary for the following reasons:

- To ensure the plan reflects adequately the focus of the National Planning Policy Framework on sustainable development and related matters including heritage; open space and nature conservation;
- To ensure the plan is consistent with The London Plan upon a range of matters including housing; density; design; strategic views; centres and culture;
- To ensure the plan addresses adequately issues relating to flood risk and water management;
- To ensure the plan reflects transport infrastructure and air quality intentions adequately;
- To ensure the plan reflects suitably the evidence base in support of the approach to employment land;
- To ensure the plan reflects the evidence base with regard to health infrastructure; and
- To ensure the objectives of the plan are linked adequately to the provision of necessary infrastructure and to ensure that adequate monitoring of the plan will be secured in the interests of effectiveness.

Introduction

1. This report contains my assessment of the Haringey Local Plan: Strategic Policies (LP) in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004. It considers whether the LP is compliant in legal terms and whether it is sound. The National Planning Policy Framework (NPPF - paragraph 182) makes clear that to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy. As stated within the Pre-Hearing Notes, this report does not deal with every individual comment or objection made to the submitted plan.
2. The starting point for the examination is the assumption that the local authority has submitted what it considers to be a sound plan. The basis for my examination is the originally titled Haringey Core Strategy Proposed Submission (May 2010); the Schedule of Minor Changes (March 2011) and the Schedule of Focused Changes (March 2011). Following publication of the National Planning Policy Framework, the Council renamed the main document as the Haringey Local Plan: Strategic Policies (LP).
3. My report deals with the main modifications that are needed to make the LP sound and legally compliant and they are identified in bold in the report (**MM**). In accordance with section 20(7C) of the 2004 Act the Council requested that I should make any modifications needed to rectify matters that make the Plan unsound or not legally compliant and thus incapable of being adopted. These main modifications are set out in the Appendix.
4. The main modifications that go to soundness have been subject to public consultation and the Council consider that updates to the SA are not required. The consultation responses have been taken into account in writing this report and minor changes to the modifications have resulted.
5. References in my report to key documentary sources are provided in footnotes, quoting the reference number in the examination library where necessary. Regard has been had to the core documents provided.

Assessment of Soundness

Preamble

6. During the examination, the NPPF was introduced which replaced Planning Policy Statements and Guidance Notes. The government also issued its Planning Policy for Traveller Sites. The Council subsequently produced a topic paper and an appendix¹ which analysed the implications arising for the submitted plan and the resulting modifications which are necessary. An opportunity to make representations in relation to the topic paper, the modifications, the NPPF and the Planning Policy for Traveller Sites was provided by the Council. Regard has been had to all submissions made on these matters.

¹ Ref PE25 - National Planning Policy Framework - Proposed Changes to Haringey's Local Plan Strategic Policies (formerly the Core Strategy) April 2012

7. The vision and objectives of the LP, as supported by its supporting evidence, are indicative that the plan has been positively prepared and is in compliance with the NPPF in such regards. There is no persuasive evidence to the contrary.
8. At the time of the 2011 hearings the draft replacement London Plan was a document subject to potential change. The Mayor of London indicated that the LP was in general conformity with the London Plan in existence at that time. Submissions were made to the contrary upon a number of policy areas which are dealt with below as necessary. Subsequently the London Plan was published on 22nd July 2011 and the Mayor has confirmed that the submitted LP is in general conformity with this final document notwithstanding the fact that the LP requires suitable alteration to ensure that the London Plan is correctly referenced.
9. To ensure compliance with The Town and Country Planning (Local Development) (England) Regulations 2004 (as amended) which were in force at the time and following submission, the Council undertook a revised consultation upon its approach to affordable housing and employment land². Subsequently a further hearing session was held on 22nd February 2012 to discuss matters arising. These facts are reflected within the following report.
10. The NPPF indicates that it will be preferable for a plan to be drawn up for a 15 year horizon but is clear that there is some discretion in this figure. For various reasons, including the necessity for additional consultation, the Examination has taken some time to be completed and there is no evidence to suggest that the period over which the LP extends (to 2026) does not remain appropriate.

Main Matters and Issues

11. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified eleven primary matters upon which the soundness of the plan depends. The structure of the report follows broadly the structure of the hearing sessions.

Matter 1 – Does the LP provide the most appropriate strategy for sustainable development within the context of the Borough; is the approach in general conformity with the London Plan and evidenced adequately?

12. The LP has been prepared in a manner which has followed adequately the Council's Local Development Scheme (LDS). Whilst lessons may be learnt from the potential for consultation confusion in developing three DPDs in parallel (LP, Sites Allocation and Development Management), the production of the LP has met the terms of the Statement of Community Involvement. Indeed, whilst not as straightforward as may have been intended and as indicated by the Statement of Consultation³, the balance of evidence reveals no fundamental flaws in the Council's overall process of producing the LP.

² Document CCSD-03A

³ Document CSSD-09(A)

13. It is clear, particularly with regard to Section 1 and the cross references within each Strategic Policy (SP), that the LP is informed by and aligned with the Council's Community Strategy⁴ (SCS). This section of the LP contains a range of data related to demographics and provides an adequate narrative for understanding the development needs of the Borough. Matters relating to the locally distinct parts of the Borough are identified robustly whilst the characteristics, constraints and opportunities for new development in key parts of the Borough are identified suitably, for example Haringey Heartlands/Wood Green and Tottenham Hale.
14. Invariably local opinions may differ in relation to the characterisation and delineation of some parts of local areas but these do not mean the soundness of the LP is undermined. The strategic thrust of the LP is in accord with the London Plan and is based upon a credible evidence base, including the Sustainability Appraisal (SA) which refers to the due consideration of alternatives.
15. Whilst issues relating to population figures, including forecasts, can be measured in different ways, the use of Greater London Authority Demographic Projections provides an adequate and credible basis for the content of the policies of the LP. Such data has been gathered from Haringey and its surrounds; indeed, the LP contains clear evidence of cross border working on a range of matters, for example as relates to education, health and transport and which, at a strategic level, will ensure the LP is responsive to issues and developments that lie beyond Haringey's administrative area.
16. Whilst detailed and rather long, Section 1 of the LP indicates a clear vision for this part of north London. It is underpinned, in accord with the thrust of the London Plan and the NPPF, by the aspiration to secure sustainable development. To secure clarity and the effectiveness of the plan in these regards I recommend the suggested change of the Council to incorporate a new policy relating to a presumption in favour of sustainable development (**MM1**) which will emphasise the consistency of the LP with national policy.
17. The Spatial Vision and Strategic Objectives have emerged from a consideration of alternatives and with due regard to the iterative process of SA. The resulting Spatial Strategy, with its three tier approach to growth incorporating Opportunity Areas/Areas of Intensification, Areas of Change and Areas of Limited Change, appears based on sound principles. I note that the Council is satisfied that the SA adequately summarises or repeats the reasons that were given for rejecting the alternatives at the time when they were ruled out and maintains the view that those reasons are still valid. No substantive contrary evidence has been submitted.
18. To aid clarity and in the interests of having an effective plan, the Council has proposed a necessary change to SP1 which will provide consistency with the London Plan in relation to housing figures. I recommend this alteration for the same reasons (**MM2**). It must also be recognised that forthcoming planning documents, such as the Sites Allocation DPD and Area Action Plans (AAPs) will provide greater detail on the delivery of the strategic aims and will invariably engage with all relevant stakeholders, including the local communities affected.

⁴ Document LBH-26

19. Overall and notwithstanding the matters considered below, the LP is evidenced adequately, is in conformity with the London Plan and does provide the most appropriate strategy for sustainable development within the context of the Borough.

Matter 2 – Is the LP's approach to housing provision deliverable, sufficiently justified and consistent with the London Plan and national planning policy? Is the LP effective in meeting the varied housing needs of the Borough?

20. The Council has relied upon a range of national, regional and local information to demonstrate that its approach to housing provision for the Borough accords with the evidence based approach advocated by the NPPF. This includes the North London sub-region Strategic Housing Market Assessment (SHMA), a Strategic Housing Land Availability Assessment (SHLAA), an Affordable Housing Viability Assessment and a revised Housing Trajectory. The evidence clearly demonstrates the complexity and dynamism of housing requirements within North London.
21. The Council acknowledge⁵, with due regard to the scenarios indicated within the SHMA, that the objectively assessed housing requirements for the Borough over the plan period will be greater than the identified development capacity of the area. Nevertheless, it is anticipated that shortfalls will be mitigated by a combination of factors including the sub division of existing dwellings, out migration, fewer household formations and the potential for the Council to exceed its minimum targets for new housing provision. There is no reason to disagree.
22. The Council indicate that SP2 'Housing' is in conformity with the London Plan and the LP seeks to maximise the capacity of housing development over the plan period. To this end, in line with its growth areas approach, the LP indicates an ability to meet and exceed the housing targets indicated by the London Plan (annual average of 820 new units). Indeed, the Mayor of London has raised no objection to the LP in relation to housing. Based upon the available evidence and particularly the SHLAA and housing trajectory, the LP illustrates a pragmatic approach to the challenge of providing a range of housing which will contribute meaningfully to the needs of the Borough and those of London as a whole. This includes an intention to provide an additional 5% buffer in the five year housing land supply as required by the NPPF. I recommend the Council's suggested changes to the LP as main modifications to ensure consistency with the London Plan in terms of housing numbers and to maximise the effectiveness of its housing delivery (**MM 4, 7**).
23. Subject to the Council's proposed change (**MM 8**) which I recommend as a main modification for reasons of consistency, clarity and effectiveness, SP2 will take a design led approach to the issue of housing density with due regard to the London Plan Density Matrix. Whilst, there is no current residential density study of the Borough, the subsequent area specific planning documents, for example the intended AAPs, will, as confirmed by the Council, incorporate characterisation assessments that will inform the application of density policy. There are no substantive reasons to consider that such an approach would be

⁵ Factual Statement 1

ineffective.

24. Indeed, the extant policies of the Unitary Development Plan (UDP) will continue to operate in conjunction with the advice and guidance of the Mayor and the Council's own Housing SPD until such time as they are supplemented or replaced by the other planning documents indicated by the LDS. The cumulative effect will address adequately matters of housing type and size related to established requirements. The overall approach is therefore capable of ensuring the effective delivery of the Council's strategic housing intentions.
25. The LP has evolved from inception in how it addresses matters of affordable housing as defined by the NPPF. It is clear that there is a significant requirement for such housing across differing tenures and dwelling types. The LP seeks a balanced approach for affordable housing delivery and sets a strategic target of 70% social rented (including affordable rented) and 30% intermediate housing; both aspects of the Council's strategy are supported adequately by the evidence base.
26. The affordable housing viability assessment indicates that it is feasible, in broad terms, to secure the provision of 50% affordable housing on sites capable of delivering ten or more units and there is no persuasive contrary evidence. I note the outcome of the Council's pre-submission additional consultation relating to SP2 which will also secure a warranted element of affordable housing within schemes below the ten unit threshold.
27. The Council's Housing SPD, which will be superseded in due course by a combination of the content of the London Housing Design Guide and the Development Management DPD, provides further clarity on the implementation of policy, particularly as regards affordable housing; further area specific details will emerge from subsequent AAPs. I recommend the Council's suggested changes (**MM 5, 6, 10, 11**) as main modifications which will provide clarity of purpose yet maintain flexibility in delivery of the Council's intentions of securing affordable housing as part of development schemes which may come forward over the plan period. Overall, I am satisfied that the content of the LP and SP2 are justified by the available evidence.
28. To ensure the effectiveness of SP2, I recommend the Council's suggested change as a main modification (**MM 9**) which would ensure the priority of housing delivery is highlighted and provide clarity and effectiveness in how the issue of family housing is to be addressed within the LP. The various clarifications suggested by the Council in the submitted 'Main Modifications Schedule' appear most helpful in relation, for example, to addressing the needs of vulnerable and older people; on balance, however, they are not essential modifications necessary to ensure the soundness of the plan.
29. With due regard to the London Plan and current government advice, I recommend the Council's suggested changes to the supporting text of SP3, as it relates to Gypsies and Travellers which will ensure the consistency, clarity and effectiveness of the plan (**MM 13**).
30. Based upon the comprehensive evidence which is available, including that which addresses the varied housing needs of the Borough, the LP's approach to housing provision would appear capable of effective delivery, is sufficiently justified and is consistent with the London Plan and national planning policy.

Matter 3 – Does the LP provide a suitable and evidenced strategic direction for matters relating to climate change, waste management and water resources?

31. The LP sets out a proactive approach towards the issue of climate change. It seeks to tackle the challenge of facilitating growth whilst addressing the impacts, with particular regard to 'carbon footprints', of development within the Borough. In pursuit of this objective, the LP contains a cross cutting suite of policies that have been developed with due regard to the previously available guidance which included PPS1 and its supplement, PPS4, PPS22⁶ and evidence gleaned from the Council's own Greenest Borough Strategy, the Climate Change, Site Development and Energy Infrastructure Study and the Council's 40:20 Action Plan. The approach is consistent with the NPPF.
32. The LP conforms with the London Plan and it is clear that the Development Management DPD (DMDPD) and Sustainable Design and Construction SPD will provide an appropriate opportunity for specifying measures relating to energy provision, usage and climate change as a whole. Suitable regard has been had to the Mayor of London's energy hierarchy.
33. LP SP4 addresses energy use and supply. The energy use targets within the policy are predicated on established methodologies and there is no robust evidence to suggest they are unreasonable, inflexible or that they will ultimately be ineffective. Notwithstanding concerns voiced at the Hearings, there is insufficient substantive evidence to suggest that the development of energy hubs is fundamentally flawed in the context of climate change and energy use. Indeed, the LP takes a flexible approach towards new development and the connection to decentralised energy systems which include considerations of development viability and their potential location. This is usefully clarified by the Council's suggested change to the LP supporting text⁷ albeit this is not essential to secure the soundness of the plan. Detailed assessments of decentralised energy networks appear to be underway in parts of the Borough and, with this in mind, there is no consequent indication that the approach of the LP is erroneous or unjustified.
34. LP SP5 sets out the Council's strategic approach to water management and flooding issues. I am particularly mindful of the content of the Statement of Common Ground between the Council and the Environment Agency and the liaison that has occurred with partners within and beyond Haringey's boundaries. The joint Strategic Flood Risk Assessment (Stage 1), in conjunction with the Sequential Test for the Core Strategy Areas of Development, provides a credible evidence base for SP5 and the LP as a whole. Invariably these, alongside the Surface Water Management Plan, will clarify the need for necessary further evidence and inform the content of the subsequent planning documents, such as the DMDPD, AAPs and the Sites Allocation DPD. This strategic approach is sound.
35. To ensure the clarity and the effectiveness of the LP, and in recognition of the ongoing work being undertaken, I recommend the Council's proposed changes

⁶ Planning Policy Statements: 1 - Delivering Sustainable Development; 4 - Planning for Sustainable Economic Growth; 22 - Renewable Energy

⁷ Main Modifications Schedule ref 146

(MM 16, 17, 18) which relate to flood risk and water management as main modifications. Such changes will address adequately the Thames Tunnel and the Mayor's drainage hierarchy.

36. LP SP6 indicates the Council's strategic approach to waste and recycling, essentially focussed upon the minimisation and local management of waste. The policy has evolved considerably from the Preferred Option stage of the LP and emphasises the appropriate link with the prepared North London Waste Plan (NLWP). The NLWP, which includes a range of policies relating to waste sites, recycling centres, the protection of amenity and related matters, has been subject to an independent Examination but it appears, for reasons of legal compliance, that the submitted plan will not be able to progress to adoption. Nevertheless, the Council has confirmed its commitment to a redeveloped NLWP as a joint local plan and there is no reason to conclude that this would not be a suitable means by which such detailed matters could be addressed.
37. The general evidence base for SP6 is robust for the purposes of strategic policy. It aligns adequately with the London Plan and safeguards existing waste site provision. Further details of how the waste minimisation strategy will be delivered effectively are delegated reasonably to the DMDPD whilst the NLWP will provide specific details on a range of waste related matters.
38. Importantly, the NLWP is intended to provide criteria for the location of waste development proposals and the location of household recycling centres linked to the protection of amenity. I have no reason to consider that such an approach is unsound. With this in mind and whilst I recognise that discussions appear to be ongoing between the Council, its partners and local stakeholders, there is no specific proposal within the LP to allocate a site at the former Friern Barnet sewage works for waste management purposes. The examination process into any NLWP would be an appropriate means by which the merits of such a specific site allocation could be explored fully. Employment land allocations which include Friern Barnet, are addressed further in this report under Matters 5 and 12.
39. Overall, the LP provides a suitable and evidenced strategic approach to matters relating to climate change, waste management and water resources.

Matter 4 – Is the advocated approach to sustainable transport the most appropriate strategy within the context of the Borough? Does the evidence support sufficiently the premise that the approach will be effective?

40. The iterative process of SA has informed the content of the LP in relation to sustainable transport. In essence, the preferred approach seeks to support economic regeneration, improve the safety and security of the transport network, reduce car dependency and use whilst improving environmental quality with a positive effect upon climate change. This is embodied within SP7.
41. The Council has suggested a number of changes to the LP which will demonstrate and emphasise the consistency of SP7 with the content of the NPPF and the thrust of the London Plan. These will reference the Mayor's road user hierarchy and ensure modes of transport such as cycling and walking are given due regard. Indeed, the Council also identify the need for further changes to demonstrate the linkages between SP7 and the Local

Implementation Plan (LIP), Transport for London and its other partners. In the interests of clarity and effectiveness, I recommend such changes as main modifications (**MM 22, 23, 24, 25**).

42. The Council has a clear desire to secure suitable progress with regard to significant transportation schemes, for example the Tottenham Hale Gyrotory Project. The Council's inclusion and adaptation of its Appendix 3 into the LP, whilst not a main modification necessary to secure soundness, will ensure appropriate referencing to such schemes, the details of which will emerge over the life of the LP, including additional planning documents such as the intended AAPs when adopted.
43. The LP and SP7 make due reference to other documents intended to be produced by the Council, such as the DMDPD, which will provide specific guidance upon matters such as car and cycle parking. Such an approach appears logical and I have no reason to find that such subsequent details will not be consistent with the NPPF.
44. Transportation invariably has an impact upon air quality which is recognised within the submitted LP. Nonetheless, I recommend the Council's suggested change to the LP (**MM 26**) which, in conjunction with Policy SP14, the DMDPD and the Sustainable Design and Construction SPD, will ensure such impacts are acknowledged adequately particularly in relation to new development schemes. There is no reason to consider that the recommended modification would not secure the effective implementation of any necessary mitigation measures.
45. The advocated approach to sustainable transport is, on the basis of the submitted evidence, the most appropriate strategy within the context of the Borough and there is no reason to consider that the approach will not be effective.

Matter 5 – Does the LP provide the most appropriate strategy towards jobs and business given the context of the Borough? Is the approach in general conformity with the London Plan and evidenced adequately, particularly with regard to national planning policy? Will the approach be effective, particularly with regard to flexibility?

(Incorporating Matter 12: Additional Hearing in relation to Fundamental Changes - Are the pre-submission fundamental changes justified adequately by the evidence base and in conformity with the London Plan and national policy? Will the approach be effective with due regard to flexibility?)

46. During the formulation of the submitted LP and after the Council completed its Employment Study⁸ and Retail and Town Centres Study⁹ (2008), PPS4 was published. This set out the government's position regarding planning for economic development. The Council considers that its two primary studies followed the thrust of PPS4 and were consistent with its requirements. Based upon the submitted evidence and the hearing sessions held, there are no substantive reasons to disagree. The NPPF has subsequently replaced PPS4

⁸ Document LBH-14 & (A)

⁹ Document LBH-33 & (A)

but the LP remains broadly consistent with its content. The Mayor of London identifies no outstanding conformity issues with regard to the London Plan and I do not dissent. Indeed, and with due regard to the comments received in relation to the Council's consultation, the LP does not run contrary to the government's statement 'Planning for Growth'. In line with the NPPF, the LP seeks to take a positive approach to securing a viable and sustainable economy for the Borough.

47. Policy SP8 refers specifically to employment matters and establishes a hierarchy of employment land within Haringey in a manner that accords with the London Plan. The submitted approach is justified by, amongst other sources, the Employment Study of 2004 which was updated in 2008 and latterly in 2012. The SA, in addition to earlier versions of the LP, explored alternative approaches and I have no reason to consider its findings fundamentally flawed. With this in mind, there is no compelling evidence to indicate that the overarching strategy within the LP is not justified. There are no substantive indications that the general methodology or assumptions of the Employment Study are incorrect or that the consequent floor space and employment land figures included within the LP are misplaced; the evidence provides robust support for the strategy of the LP. Indeed, the evidence base and the LP acknowledge the changing dynamics of both London and the local economy wherein there is an increasing anticipated demand for premises to be used for purposes falling within Class B1¹⁰. The advocated controlled release of employment land to cater for the changing character, needs and general dynamism of this part of London is both justified and consistent with the overarching content of the London Plan.
48. The NPPF provides a commitment to build a strong and competitive economy. With this in mind, it is clear that strategic site allocations should be designed to meet needs over a plan period and that land allocations should be subject to regular review. Mindful of this, I am satisfied that the Council's Employment Study, which supports the protection of existing Defined Employment Areas (DEAs), is a reasonable and proportionate evidence base that indicates adequately the need for employment land and premises across the Borough. It supports robustly the thrust of the LP and its general strategy.
49. In relation to the employment land hierarchy, the publication LP (May 2010) identifies its Strategic Industrial Locations (SIL) which are broadly in line with the London Plan. This principle is warranted and sound.
50. The Locally Significant Industrial Sites (LSIS) of the Borough are intended to be used for a range of industrial activities where, amongst other matters, they continue to meet demand. Such areas are, as described, of local significance and for reasons of effectiveness I recommend as a main modification the Council's proposed change which clarifies the uses to which they may be put (**MM 29**). The necessary flexibility for the location of other employment generating uses can be found in the Council's Local Employment Areas (LEAs).
51. The Council's publication LP (May 2010), informed by the Employment Study, carried forward the DEAs of the UDP. This appears both logical and justified. Subsequently however, the Council chose to alter some of the specific

¹⁰ The Town and Country Planning (Use Classes) Order 1987 (as amended)

designations of its DEAs through the publication of its Schedule of Focussed Changes prior to submitting the LP for examination. However, the analytical basis for these changes is less than clear.

52. In support of the Schedule of Focussed Changes, Document Ref CSSD-03a¹¹ refers to the post consultation changes of some of the 22 DEA sites within the employment land hierarchy. I have noted the Council's Cabinet Report¹² which indicates that the changes to DEAs arose from the responses to the LP consultation exercise undertaken in May and June 2010. The Cabinet Report indicates that the changes are designed to ensure suitable employment land is safeguarded to meet future requirements and includes identified sites that could have their designations within the employment hierarchy altered to reflect their changing environment and, where necessary, increase their level of protection for B class uses.
53. However, with due regard to the above documents and even though some of the identified DEAs remained unaltered by the Cabinet Report's 'initial review', there is no clear evidence which demonstrates how the review was undertaken and, for example, against what criteria. There is no robust or consistent analysis of each DEA, for example in relation to their context, content or function, nor a clear assessment as to why individual designations should be altered.
54. With regard to SIL, it is clear that during the production process for the LP the London Plan has been produced, examined and adopted. This contains a sound evidence base at a strategic level for employment land requirements and particularly addresses SIL. In light of the available information and mindful of the need for proportionality in evidence, the LP appears to be in accord with the thrust of the London Plan and the Mayor has raised no objection to the policy provisions. I therefore have no reason to disagree or to find the LP unsound in these respects albeit, in partial acknowledgement of the Greater London Authority's submissions and to ensure long term effectiveness, I recommend clarification of the approach to employment land as locally affected by the draft Upper Lee Valley Opportunity Framework (ULV) (part **MM28**).
55. In relation to LSIS however, the Employment Land Study (2008) cross references the Mayor of London's Industrial Land Capacity SPG which was a useful and logical reference point for assessing employment land needs and provision and has been recently replaced by the Land for Industry and Transport SPG¹³, a document which maintains an evidence based approach to the planning and management of employment land. It is clear that the 2008 Study does not set out to apply the criteria within the Mayor's original SPG to the DEAs within Haringey and makes no site specific recommendations in terms of altering the designations from those within the UDP. Whilst the Schedule of Focussed Changes does not necessarily weaken the protective approach of the LP to employment land across the Borough, it is nonetheless necessary to ensure that the changes are based on robust, albeit proportionate, evidence.

¹¹ Publication of DPD – Affordable Housing and Employment Land Designations (consolidated Sept 2011)

¹² Document LBH-60

¹³ Land for Industry and Transport Supplementary Planning Guidance Sept 2012

56. The Employment Study update (2012) makes some further references to the Mayor's original SPG criteria but the extent to which the assessments of DEA sites contained in Section 7 have been undertaken with the key criteria in mind is unclear and neither methodical nor comprehensive, even with regard to the 'Raw Data – Survey Tables' information supplied by the Council. This does not represent a comprehensive or robust evidence base for the DEAs of the Borough as shown by the Schedule of Focussed Changes. This remains the case even when considered in association with some of the descriptors of DEA2 and 6 within Doc Ref CSSD-03a and a desire to protect against retail uses carries little weight in justifying LSIS designation given the extant policy position of the development plan. In the absence of any persuasive evidence that the criteria of the Mayor's SPG have been applied thoroughly and comprehensively to the DEAs of Haringey, there is no sound analytical basis for creating new LSIS at this time.
57. The evidence indicates that there is an adequate supply of employment land for the short term and there is no substantive evidence to indicate any DEA is under imminent threat from alternative non-B class or non-conforming uses. As necessary, the Council's intended Sites Allocation DPD would provide a suitable opportunity to robustly assess the DEAs of the Borough and to alter their specific designation if warranted to ensure the objectives behind SP8 are secured. This would accord with the thrust of the NPPF to secure regular reviews of site allocations.
58. With due regard to the evidence and the justification provided in relation to employment land, I therefore recommend the necessary main modification to discount the unjustified Schedule of Focussed Changes as they relate to alterations of the Borough's DEAs at the level of LSIS and below in the employment land hierarchy (**MM28**).
59. Document ref CSSd-03a and the Employment Land Study (2012 update) provide further descriptions of the various other DEAs of the borough and provide a limited assessment of each area and its context. However, the basis for each description is unclear, for example whether any recent land use survey has been undertaken and if so the detailed results, which may include uses and vacancy rates. Some additional evidence has been supplied independently of the Council, for example in relation to DEA9, which suggests scope for altering the employment land designation of certain areas. However, the LP seeks to set a coordinated and strategic approach to the employment land allocations of the Borough and in the interests of consistency, the available evidence does not support adequately the proposed changes to the affected DEAs in this regard. The Sites Allocation DPD would be a reasonable and potentially timely means by which all DEAs can be reviewed as necessary with the production of proportionate objective evidence linked, amongst other matters, to the Mayor's Industrial Land and Transport SPG.
60. As is to be reasonably expected, economic activity in Haringey reflects the dynamism of London as a whole. Whilst there is a clear necessity for an evidence based approach to employment land allocations, as reflected by the content of the NPPF and the Mayor's Industrial Land and Transport SPG, the LP must be sufficiently flexible so as to be effective in operation. This is particularly pertinent to areas such as Tottenham Hale and its surrounds. Whilst the Sites Allocation DPD offers a suitable review mechanism for the employment land allocations of Haringey, the recommended alteration to LP paragraph 5.1.5 (**MM28**) acknowledges that other planning considerations and

documents, such as the ULV, may be given due weight in the evolution of schemes and redevelopment opportunities in areas including DEA9 and DEA17 prior to any subsequent evidence based review of the Council's employment land allocations.

61. **MM28** affects all LSIS designations proposed by the Schedule of Focussed Changes. This will include the Friern Barnet site (DEA 6). Submissions were made that the continued allocation of DEA 6 as a LEA is not warranted due, in part, to its long history of vacancy, its nature conservation value and the scope for alternative uses. Notwithstanding the most recent linkages between the site and the North London Waste Plan¹⁴, the site was clearly part of the Council's employment land strategy for the UDP and, as referred above, the Employment Land Study supports adequately the LP strategy across the Borough. The site appears to have been previously marketed and has attracted developer interest for a range of uses, albeit these have not been pursued for unspecified reasons. Furthermore, the site is reasonably well located in broad terms of accessibility and appears to have the potential to provide some employment opportunities in the west of the Borough. These factors support the principle of its DEA allocation.
62. The LP recognises that the site has nature conservation value (SINC – Grade 1 importance). The available evidence, including that produced by Jacobs¹⁵ and the submissions of Natural England, does not indicate an automatically irreconcilable conflict between an employment designation and any identified nature conservation value. The balance of the available evidence at this time, which includes the restricted public access, does not indicate that the site would warrant a sole designation as a Local Nature Reserve or as Metropolitan Open Land (MOL) over and above the UDP allocation as a LEA. Nonetheless, the Sites Allocation DPD would provide an opportunity to review its status. This would be a suitable opportunity to take into account as necessary the outcome of the application for Village/Town Green registration and other contemporary evidence which would include considerations of its open space value, its biodiversity and its specific site features such as the culverted water course. Mindful of the considerable public interest in the use of this site, this would be a further opportunity to engage appropriately with all relevant parties. In the interim, the continuation of the UDP LEA designation for the site, in conjunction with recognition of its nature conservation value, is warranted.
63. Notwithstanding requests by various interested parties, it is not incumbent upon me in reporting upon the soundness of the LP to conclude upon the current status of DEA6 in terms of its lawful use; alternative and more appropriate procedures exist to explore necessary evidence fully and resolve such matters.
64. SP9 relates to skills, training and jobs and addresses the matters evidenced by documents such as the Employment Study. Subject to the clarification of how the policy will be monitored effectively as suggested by the Council and dealt with under Matter 11, I have no reason to consider this policy unsound.

¹⁴ Submitted for Examination albeit programmed Hearings cancelled pending possible withdrawal

¹⁵ Jacobs Reports Ref PE-15

65. Overall, and subject to my recommended modifications, the LP provides the most appropriate and effective strategy towards jobs and business given the context of the Borough. The approach is in general conformity with the London Plan and is evidenced adequately with due regard to national planning policy.

Matter 6 – Does the LP provide the most appropriate and sufficiently comprehensive strategy towards town centres and retail provision in the context of the Borough and with due regard to cross border issues? Is the approach in general conformity with the London Plan and evidenced adequately with due regard to national planning policy? Will the approach be effective, particularly with regard to flexibility?

66. The Council has relied significantly upon its Retail and Town Centres Study (2008) in formulating its approach to town centres and retail provision which includes analysis of retail issues beyond the Borough boundaries. This is supplemented by some evidence from town centre health checks which show the vacancy rates of premises below the London and national average. The Council recognises that the Retail and Town Centres Study and its evidence base do not cover, comprehensively, the intended plan period until 2026; it assesses the need for retail floor space at stages until 2021. I heard that the Council intend to ensure that a suitable and comprehensive evidence base will be produced to cover the life of the LP through the production of the intended AAPs which will cover the relevant Haringey town centres and through a revised Retail and Town Centres Study.
67. Such an arrangement is not ideal but, on balance and mindful of a need for evidence to be proportionate, I am satisfied that the available information covers a significant part of the plan period. The LDS does provide opportunities for the production of additional evidence at various later dates which will also be useful as part of any monitoring and review of the appropriateness and effectiveness of the LP strategy as regards retail and town centres. Such evidence will be required to inform other planning documents such as, for example, the Wood Green AAP. On balance, the thrust of the LP is justified by the evidence available which is satisfactory for the immediate planning future of the borough.
68. SP10 identifies, indicatively, the potential need for an additional 13,800m² of gross comparison goods floor space and just over 10,000m² net convenience goods floor space over the next five years. I have no reason to doubt the veracity of these figures notwithstanding that traditional shopping patterns may be affected by challenging economic circumstances and may be increasingly dynamic in light of a propensity for increased internet trading.
69. The LP identifies a town centre hierarchy that follows the lead of the London Plan and includes the designation of Tottenham Hale to become a District Centre over the life of the plan. For reasons of clarity and effectiveness I recommend the Council's proposed change to the LP as a main modification (**MM 32**). A large proportion of the additional floor space is targeted for the Metropolitan Town Centre of Wood Green which is designed to assist in shaping the area into a thriving and vibrant centre for North London. Notwithstanding this intention and with due regard to the Retail and Town Centres Study, the available evidence to demonstrate satisfactorily that the total level of additional floor space can be accommodated within Wood Green, or indeed the Borough as whole, is limited.

70. The Retail and Town Centres Study indicates that the more efficient use of existing buildings may account for a significant proportion of the anticipated needs and there is no reason to consider that this is incapable of delivering growth in the shorter term. It remains an imperative, in the interests of effective delivery of the LP policy, that the intended Sites Allocation DPD and/or AAPs, particularly that for Wood Green, include details of how the expansion of retail floor space will be accommodated to the levels anticipated by the LP and over the period of the plan. I am mindful that there is no substantive evidence that such growth cannot necessarily be delivered.
71. Subsequent Council documents, such as the DMDPD, will be able to provide specific detail of how uses within retail frontages should be managed. The extant UDP will apply in the interim; overall, the LP provides an adequate strategic direction to the protection of small scale local shops and services, particularly outside of town centres, which generally provide a valuable and sustainable facility for local communities.
72. Despite certain limitations, the LP does provide the most appropriate and sufficiently comprehensive strategy towards town centres and retail provision in the context of the Borough with due regard to cross border issues. The approach is in general conformity with the London Plan and, notwithstanding the need for further detailed work to be undertaken for the end of the plan period and in relation to subsequent Council documents, is evidenced adequately with due regard to national planning policy. There is no substantive reason to consider the LP is incapable of achieving its objectives.

Matter 7 – Is the approach of the LP to design and tall buildings justified by the evidence base and the most appropriate strategy when considered against alternatives within the context of Haringey and with particular regard to the historic environment?

73. The Council indicates that its approach to design throughout the Borough has evolved from a recognition, at its Preferred Options Stage, that there was no viable alternative to good design and that good design includes considerations broader than merely building appearance and layout. The LP approach draws upon the objectives contained within 'By Design – Urban Design in the Planning System: Towards Better Practice'. With this in mind, SP11 promotes new development that, in terms of design, should enhance and enrich the built environment and create places and buildings that are of high quality, attractive, sustainable, safe and easy to use. In such terms, there is no outstanding conformity issue with the thrust of the London Plan or with the content of government policy.
74. To secure the objectives of SP11 the Council indicates that it will rely upon SPDs, particularly its Housing SPD and the emerging Sustainable Design and Construction document, and its DMDPD which will contain detailed policies that, in time, will replace those currently contained in the UDP and existing Supplementary Planning Guides. In addition, the Council indicates, amongst other things, that it takes into account the Building for Life criteria, the Lifetimes Homes standards and maintains a Design Panel to assess individual schemes. It therefore appears that the Council's strategic approach to suitable design is a considered one that is both cogent and supported by a sound evidence base.
75. In relation to tall buildings, the Council identifies that there are two distinct

approaches. In essence, tall buildings may be appropriate in the Growth Areas albeit that future AAPs will enable further work to be undertaken, for example, in relation to urban characterisation and leading to potential site identification. Elsewhere, on the basis of available evidence, tall buildings are not supported by the LP albeit individual proposals would be capable of submission and resolution on their own merits. Such an approach is logical and not unduly inflexible. It is clear that the Council supports, in broad terms, the approach advocated by CABE/English Heritage with the publication 'Guidance on Tall Buildings' (2007).

76. To ensure the effectiveness of SP11, I recommend the substance of the Council's proposed changes in relation to tall buildings as main modifications to the LP (**MM 34, 35**) which clarify the proposed approach to this issue.
77. SP12 relates to matters of conservation and was developed to meet the advice of PPS5¹⁶ which has been replaced by the NPPF. I have noted the Statement of Common Ground between English Heritage and the Council upon these matters. The Council concede that elements of its evidence base in relation to specific heritage assets, for example Conservation Area Character Appraisals, are incomplete. Nevertheless, as a strategic policy, SP12 sets out an approach to conservation which is consistent with the aims of national planning policy and which, when taken as a whole, is based upon adequate evidence and an understanding of the strategic heritage value of the Borough.
78. I recommend as main modifications the Council's proposed change (**MM 37**) which, amongst other matters, will ensure that the 'The London View Management Framework (SPG)' is referenced suitably with regard to views from Alexandra Palace. Indeed, the historic significance of Alexandra Palace, Alexandra Park and its environs are, as indicated by the Council's submissions¹⁷, noted suitably within the LP. The importance of other 'local views' are acknowledged positively through the proposed linkage to the intended DMDPD, AAPs and Conservation SPD. The robust monitoring of this policy will lead to an effective plan and suitable outcomes.
79. The LP approach to design and tall buildings has been adequately considered and is justified by the evidence base. I have no reason to find that it is not the most appropriate strategy when considered against alternatives within the context of Haringey and that sufficient and adequate regard has been had to the historic environment.

Matter 8 – Is the approach of the LP towards open space and biodiversity in general conformity with the London Plan and evidenced adequately with due regard to national planning policy? Will the approach be effective, particularly with regard to flexibility?

80. LP SP13 relates to Open Space and Biodiversity. The Council has indicated¹⁸ that it has taken an evidence based approach to formulating SP13 with due regard to previous policy guidance such as contained within PPG17, PPG2 and

¹⁶ Planning for the Historic Environment

¹⁷ Core Doc Ref MI-C7

¹⁸ Core Doc Ref FS-2

PPS9¹⁹. Whilst these documents have been replaced by the NPPF, there is no substantive inconsistency between the LP and the content of the NPPF. The Mayor of London has indicated that there is no outstanding issue in relation to conformity with the London Plan.

81. The NPPF makes clear that planning policies should be based on robust and up to date assessments of needs for open space, sports and recreation facilities and opportunities for new provision, incorporating both quantitative and qualitative analysis. At the local level, the Council relies heavily upon its Open Space and Sports Assessment (2003) which followed the guidance of PPG17 and its Companion Guide: 'Assessing needs and opportunities'. It has, as seen within the UDP, identified a clear typology of open space throughout the Borough.
82. The NPPF indicates that plan making evidence which is gathered should be proportionate to the job being undertaken by the plan, be relevant to the place in question and as up-to-date as practical. Against this context, the robustness of the evidence underpinning SP13 is weakened. The original assessment was undertaken some nine years previous; in the intervening period the population of the Borough has increased whilst significant new development has been brought forward. The extent to which the 2003 Assessment provides a credible analysis of existing and future needs for open space particularly in terms of both the quantity and quality of existing provision is a challenging question.
83. With this in mind, it is nonetheless clear that the Council does not rely solely upon the 2003 Assessment which has been revisited in order to inform the Council's Recreational and Open Space Standards SPD of 2008. At this time, it was concluded that there had been little or no loss of open space from the Borough and that the findings of the 2003 Assessment were still up-to-date. Furthermore, the Council refers to its Annual Monitoring Report (AMR) as evidence that there has been no substantive loss of open space whilst it has produced the 'Open Space Strategy: A space for everyone' which is designed to provide a framework for the future management and development of open space in the Borough.
84. On balance, the available evidence gives credence to the Council's strategic approach to open space but it will be imperative that in the production of further planning documents, for example the various AAPs, the available data is reviewed and potentially refreshed to ensure compliance with the aims of national policy and to inform the effective delivery of LP SP13 over the plan period. To ensure the effectiveness of the plan, the Council's proposed change to the supporting text of the LP that will clarify the approach to be taken to on-site and off-site provision of new facilities, open space and play space (**MM42**) is recommended.
85. Detailed submissions have been made in relation to the potential erosion of MOL over preceding years, for example from land sales, and with regard to inaccuracies within the identified MOL boundary currently shown on the UDP Proposals Map. Whilst it is important for the Council to delineate accurately

¹⁹ Planning for Open Space, Sport and Recreation; Green Belts; Biodiversity and Geological Conservation

the boundaries of such land, I am mindful that the Council proposes no changes to the amount of Green Belt or MOL which is currently defined within the UDP; indeed, SP 13 allows not only for its protection and improvement but also its possible extension. Thus, it will be necessary for the Council to show accurately the boundaries of its open space upon any revised policies map but I have no substantive reason to dispute the Council's submissions that it intends to maintain the planning status of the MOL and Green Belt which currently is defined.

86. The clarification and, if necessary, amendment to any MOL or open space boundary, for example as may relate to Parkland Walk or Priory Park, can reasonably be assessed within subsequent planning documents, such as the Development Management DPD or feasibly an AAP or the Sites Allocation DPD. I recommend the Council's proposed change to the LP in these regards to ensure the effectiveness of the plan (**MM40**). These avenues also provide an appropriate means to review as necessary the details of 'Green Chains' currently referenced by the LP. An awareness of the submissions made upon such matters should be carried forward as necessary.
87. The Council has confirmed that the LP satisfies the Habitats Regulations and there is no substantive evidence to suggest otherwise. There are 60 Sites of Importance for Nature Conservation (SINCs) within the Borough which are identified in the Haringey Biodiversity Action Plan. It would seem that limited resources have restricted further research into the evaluation of existing and additional sites, particularly where scope exists to increase access to natural green space of biodiversity value. However, the Council acknowledge the need to review its designated sites to assess their biodiversity value in line with the advice of the NPPF and associated guidance. Such work can be progressed reasonably within subsequent planning documents, including AAPs and the Sites Allocation DPD.
88. The Council has clarified its approach to the scope for development to occur on SINCs or Local Nature Reserves. Such an approach would not diminish the value of SINC/LNR designation yet will ensure flexibility within the plan to aid the effective delivery of sustainable development in accordance with the approach of the NPPF. I recommend its conclusion as a main modification (**MM41**). Overall and with regard to Section 11 of the NPPF, I am satisfied that the LP approach, to SINCS in particular and biodiversity in general, is adequate. SP13 will provide a suitable strategic approach to open space and biodiversity for the Borough.
89. The Council have proposed a necessary modification to SP13 which I recommend to ensure that the borough's designated historic parks and gardens are conserved appropriately (**MM39**).

Matter 9 – Does the LP provide an adequate approach to issues surrounding health and well being for the Borough? Is the approach in alignment with the London Plan, the Community Strategy and the NHS Strategic Plan for the area?

90. In relation to the issue of healthcare, the LP has been developed with the input of key partners, including the NHS, and it recognises the broad cross cutting effects of policy and planning in relation to health issues. The LP has been developed in acknowledgement of the SCS, the NHS Strategic Plan and in line with the health related provisions of the London Plan. SP14 specifically seeks

to reduce health inequalities, to recognise the links between spatial planning and health and to safeguard and enhance the necessary health infrastructure to serve the Borough.

91. The planning context for health matters has been, and will continue to be for the foreseeable future, rather dynamic and susceptible to change. It is clear that the assumptions and models promoted in the preparation of the LP, for example the development of polyclinics, have altered. As a consequence, the Council has amended in part the specifics of its strategic approach to health albeit not the fundamental aims and aspirations. I note the work that the Council has undertaken with its NHS partner in this regard. For reasons of accuracy, consistency and effectiveness I recommend as main modifications the changes proposed by the Council to reflect current circumstances (**MM 44, 45, 46**) and in order to clarify the approach to Health Impact Assessments.
92. The LP indicates that the anticipated population growth of the plan period will generate a need for additional GPs, particularly in the south east of the Borough. Whilst the available figures indicate that the Borough as a whole has sufficient GPs to meet existing and forecast population levels, the Council's additional submissions²⁰ show that the retention or redistribution of existing GPs within the Borough to meet demand is not straightforward. This is clearly a matter to be kept under close review. The proposed updates to LP Appendix 3 in this regard will provide sufficient flexibility without undermining the effectiveness of SP14 in securing an appropriate level of health infrastructure.
93. Residents expressed concerns in relation to the adequacy of health infrastructure and the scope for efficient use of existing buildings, for example St Anne's Hospital Site. Nonetheless, and subject to the necessary changes to the monitoring indicators proposed by the Council, the evidence does not suggest that the LP sets out anything other than an adequate approach to issues surrounding health and well being for the Borough. Such an approach is in sufficient alignment with the London Plan, the Sustainable Community Strategy and the NHS Strategic Plan for the area.

Matter 10 – Does the LP provide the most appropriate and sufficiently comprehensive strategy towards culture and leisure in the context of the Borough? Will the approach be effective, particularly with regard to flexibility?

94. The LP seeks to ensure conformity with the London Plan. In doing so, SP15 aims to identify cultural quarters within the Borough. However, as discussed at the Hearings and with the exception of Wood Green as defined within the UDP, there is no substantive robust evidence in support of the quarters identified in the submission LP, for example Alexandra Palace/Haringey Heartlands. I therefore recommend as main modifications the Council's proposed changes to clarify its approach to these matters and to ensure consistency with the London Plan (**MM 48, 49**). These will establish just one quarter in Wood Green.
95. At a strategic level, SP15 provides an appropriate steer for the provision and protection of cultural and leisure interests within Haringey. Invariably, SP15

²⁰ Document LBH EX-19

cannot be considered in isolation of other elements of the LP, for example SP13 and SP16, and must be cross referenced against the information within the Community Infrastructure Study (CIS). The LP recognises the value of leisure and cultural assets and SP15 is formulated on the evidence within the CIS.

96. Additional evidence could be gathered in relation to facilities and infrastructure which exist within the Borough, including those which may not relate directly to sports activities; nonetheless, the NPPF indicates that evidence must be proportionate and there is no reason to consider that the available information does not justify adequately SP15. This policy will inevitably provide a basis for the further collation of evidence and consideration of such matters as part, for example, of any AAP adoption or the Sites Allocation DPD.
97. The Council suggest a number of changes to SP16 and its supporting text which are useful but do not alter the substance of the policy ambitions and do not constitute necessary main modifications. The LP will consequently provide appropriate recognition for the provision, enhancement and protection of community facilities and services, linked to identified deficiencies, and with an appropriate reference to the intended DMDPD which will provide details relevant to implementation and delivery.
98. On balance, the LP does provide the most appropriate and sufficiently comprehensive strategy towards culture and leisure in the context of the Borough. Community facilities and services are recognised adequately within SP16 and, in conjunction with other planning documents, the LP will be sufficiently flexible and effective in these regards.

Matter 11 – Does the LP address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives? Are the LP's monitoring targets justified adequately and of a level of detail that is appropriate?

99. The NPPF makes clear that to be sound a plan should be effective. To be effective a plan should therefore include clear arrangements for the management and monitoring of the delivery of the strategy. To this end and following consideration at the examination hearings, the Council has suggested a number of changes to its approach to ensuring the effectiveness of the LP policies and its strategy.
100. The indicators to be used to monitor each Strategic Policy have been revised and included within a new Appendix to the LP which will link to the Annual Monitoring Report. This will supplement the information contained, and in places proposed to be changed, within Appendices 2 and 3 of the LP; indeed, the Infrastructure Delivery Plan includes details of key projects and key delivery partners yet is clearly not an exhaustive list of necessary infrastructure for the life of the plan. I note the additional clarification as to how the LP will relate to the intended operation of the Community Infrastructure Levy. The cumulative effect of the following necessary modifications will ensure the effectiveness of the plan (**MM 3, 12, 14, 15, 19, 21, 27, 30, 31, 33, 36, 38, 43, 47, 51, 52, 53, 54, 55, 56, 58**).
101. The available evidence suggests that the LP makes adequate provision for infrastructure relating to education and the emergency services.
102. The LP contains details of the extant UDP policies and clear references to other

planning documents intended by the Council. These documents, such as the Sites Allocation DPD, DMDPD and various AAPS, will provide suitable points at which the need for, and progress upon, the delivery of key infrastructure can be reviewed and, as necessary, managed.

103. Changes to the existing UDP Proposals Map (to be known as a Policies Map) will invariably flow from the content of the Local Plan but the Map itself is not directly before me for examination. As referenced previously and with an awareness of concerns expressed by interested parties, it is incumbent upon the Council to ensure that the delineation of area boundaries and sites is accurate and truly reflective of the physical attributes of those areas of interest. The resultant Policies Map will require constant review in light of further intended DPDs, particularly AAPS and the Sites Allocation DPD, which will be subject to further consultation and independent examination.
104. The LP does address adequately the provision of necessary infrastructure to support the delivery of the strategic objectives and, subject to the recommended modifications, will contain monitoring targets that are justified adequately and of a level of detail that is appropriate to a strategic plan. The LP takes a flexible approach to the delivery of its policy objectives which take into account adequately considerations of development viability; indeed and with regard to the thrust of the NPPF, there is no evidence to suggest the plan takes an unjustified or ineffective approach to viability issues as a whole.

Assessment of Legal Compliance

105. My examination of the compliance of the LP with the legal requirements is summarised in the table below. The Council is updating its LDS to reflect changes in legislation and local circumstance which will also reflect the fact that some slippage has occurred in the production timetable of the LP and other documents. With this in mind, I conclude that there are no fundamental impediments of Legal Compliance in relation to the LP.

LEGAL REQUIREMENTS	
Local Development Scheme (LDS)	The Local Plan is identified within the approved LDS September 2010 which sets out an expected submission date within 2011 albeit with an adoption date of November 2011. The necessary length of the Examination has caused slippage in this timetable. Nonetheless, the Local Plan has been prepared in accordance with the thrust of the LDS.
Statement of Community Involvement (SCI) and relevant regulations	The SCI was adopted in 2005 and consultation has been compliant with the requirements therein, including the consultation on the post-submission matters where necessary.
Sustainability Appraisal (SA)	SA has been carried out and is adequate.
Appropriate Assessment (AA)	The Habitats Regulations AA Screening Report (December 2009) sets out why AA is not necessary.
National Policy	The Local Plan complies with national policy except where indicated and modifications are recommended.

The London Plan	The Local Plan is in general conformity with the London Plan.
Sustainable Community Strategy (SCS)	Satisfactory regard has been paid to the SCS.
2004 Act (as amended) and 2012 Regulations	The Local Plan complies with the Act and the Regulations.

Overall Conclusion and Recommendation

106. The Plan has a number of deficiencies in relation to soundness for the reasons set out above which mean that I recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the Act. These deficiencies have been explored in the main issues set out above.

107. The Council has requested that I recommend main modifications to make the Plan sound and/or legally compliant and capable of adoption. I conclude that, with the recommended main modifications set out in the Appendix, the Haringey Borough Council Local Plan Strategic Policies satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

A J Seaman

Inspector

This report is accompanied by the Appendix containing the Main Modifications

Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~striketrough~~ for deletions and underlining for additions of text, or by specifying the modification in words in *italics*.

The page numbers and paragraph numbering below refer to the submission LP, and do not take account of the deletion or addition of text. The Council reference relates to the Council's Consolidated Schedule of Post Submission Modifications (Document PE-26).

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	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)."
3	87 88	77	Indicators box	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)."
4	94	79	SP2 3.2	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)."

Report Ref	Council Ref	Page	Policy/ Paragraph	Main Modification
5	95	79	SP2 3.2	Delete 5th bullet point in SP2 and replace with: "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 <u>Affordable Rent (including social rent)</u> 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 <u>305,000</u> additional homes from 2011/12 - 2021/22 <u>2006/07 - 2016/17</u> and a Haringey target of 8,200 <u>6,800</u> additional dwellings (a target of 820 <u>680</u> 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 <u>PPS3 Housing</u>. 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 <u>of 820 units annual target</u> (see Appendix 2) over the plan period, <u>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,</u> 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

Report Ref	Council Ref	Page	Policy/ Paragraph	Main Modification
				Accessibility Levels (PTAL). The Council will adopt a 'design-led' approach to density.'
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 medium 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 under occupied properties to find more suitable accommodation"</u></i></p>
10	117 118	83	SP2 3.2	<p>Under sub heading '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>

Report Ref	Council Ref	Page	Policy/ Paragraph	Main Modification
12	130	86	Indicators box 3.2	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, 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

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				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 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 will identify 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	104	Indicators	Remove indicators box and replace with the following

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	164		box 4.3	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 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 Gyratory 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

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				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 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	To read as follows: SP8 - Employment 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. The Council will: <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

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				<p>travel to work;</p> <ul style="list-style-type: none"> • 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 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 <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.

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		114	5.1.4	Add an additional final sentence: Policing and other community safety infrastructure proposed within the employment land hierarchy will be dealt with on an individual site basis and with due regard to the provisions of the London Plan.
		114	5.1.5	Add an additional sentence: The hierarchy of sites will be further reviewed and revised as necessary 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. The consideration of the boundary and function of employment land allocations, including the scope for new land uses, should be consistent with any strategically coordinated process such as promoted by the Upper Lee Valley Opportunity Area Planning Framework.
29	189	115	5.1.10	These are well established industrial areas and the aim is to retain them solely for uses that fall within B1 (b), (c) B2 or B8 uses or uses that share strong similarities to this use class for example policing and other community safety infrastructure, in line with National and Regional guidance. Amend part of last sentence in para 5.1.10 as follows: " but will not permit any change of use from those listed above "
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."
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 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

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				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: <ul style="list-style-type: none"> - 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 (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, for example 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
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				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.
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 SINC's and LNRs 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. <u><i>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.</i></u> "
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

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				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>including those in</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 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 polyclinics 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 <i>re-developed and new primary care facilities and resource centre/s for local public health services and</i>

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				<p><i>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.</i></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>
48	285	175	SP15 7.2	<p>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></p> <p>The development of the following cultural areas</p>

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				<p>across the borough:</p> <ul style="list-style-type: none"> – Tottenham Green; – Tottenham Hotspur; – Hornsey Town Hall; – Wood Green/Haringey Heartlands/Alexandra Palace & Park; and – Harringay Green Lanes.
49	287	175	SP15 7.2	In SP15 and throughout Section 7.2 delete "Cultural Areas" and replace with " <i>Cultural Quarters</i> "
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	<p>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 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</p>

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				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."
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 contributions are monitored and distributed as developments are implemented."</p>
55	340	200	8.2.23	Delete first paragraph of 8.2.23 and replace with the

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				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.