

## Public Examination into the Haringey Core Strategy June 2011

### Indicative Matters and Issues for Examination

#### Hearing 1

##### Matter 1

*Does the Core Strategy 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?*

- i In line with PPS1 *Delivering Sustainable Development* and PPS12 *Local Spatial Planning*, Haringey's Core Strategy provides the most appropriate strategy for sustainable development within the context of the borough. The Council's overall strategy for managing future growth in Haringey is to promote the provision of homes, jobs and other facilities in the areas with significant redevelopment opportunities, and support appropriate development at other accessible locations. The Core Strategy timeline of 15 years shows long term, strategic planning.
- ii The Core Strategy has been informed by National Planning Policy Guidance/Statements, regional plans and strategies and plans and strategies of the Council and its partners. Further to public consultations, each stage of the Core Strategy has been informed by an independent sustainability appraisal to evaluate the social, economic and environmental effects of the suggested options, and final preferred strategy.
- iii The Council considers the Core Strategy as submitted, alongside the schedules of both minor and fundamental changes, to be in general conformity with the London Plan and its draft replacement. Through the various stages of consultation the Council has engaged in full with the GLA to address all of their concerns. The Statement of Common Ground between both parties does state that the Council's schedules of changes would resolve the Mayor's issues and once incorporated into the Core Strategy would result in the Core Strategy being in conformity with the London Plan.

## 1. Issue 1.1

*To what extent is the Core Strategy in general conformity with both the London Plan and its draft replacement? To what extent does the Core Strategy accord with the advice of PPS1, PPS12 and associated guidance?*

### National Policy

- 1.1 The Core Strategy has been developed under the requirements set out by the Planning and Compulsory Purchase Act 2004 and can be demonstrated to meet the requirements of PPS1 and PPS12. The Core Strategy provides direction of the spatial structure, choices and arrangement of facilities, as set out in PPS12. The Strategy articulates this by identifying areas for sustainable growth. These are framed by policies and defined spatially on the Key Diagram and Proposals Map.
- 1.2 The Core Strategy is in line with the requirements of PPS1 paragraph 32, part i-iii, as it sets out a clear vision for the future pattern of development with clear objectives, includes clear policies with indicators against which progress can be measured, it considers the needs and problems of the communities and takes account of relevant strategies and programmes, and it takes forward those elements of the Sustainable Community Strategy that relate to the physical development and use of land in the borough.
- 1.3 The Core Strategy is tied together by the Spatial Vision set out in 1.5.4 and the Strategic Objectives in 1.5.6. Each specific theme such as housing, economic development, managing growth etc is considered within separate sections to develop the specific policies that are required of the Core Strategy, but each topic can be seen to be related to the overall Spatial Vision and Objectives. In line with paragraph 4.35 of PPS12, the Core Strategy has been produced to align and coordinate with Haringey's Sustainable Community Strategy, set out in section 1.1 of the document.
- 1.4 The effectiveness of the various elements that make up the Core Strategy have been queried and tested by the consultation process on the Issues and Options in 2008 and the Council's preferred options in 2009. The responses and feedback helped shape the proposed submission Core Strategy in 2010, delivering a document that has been subject to a wide range of strategic thinking.
- 1.5 Further to the consultations, each stage has been informed by an independent sustainability appraisal to evaluate the social, economic and environmental effects of the Core Strategy. An Equalities Impact Assessment and a Habitats Regulations Assessment was also carried out.

- 1.6 A substantial evidence base has been established, set out in 1.1.13 of the Core Strategy. These include documents such as the Haringey Retail Study, the Employment Land Study, the Affordable Housing Viability Study, an Energy Infrastructure Study for Haringey and the Community Infrastructure Plan. The Core Strategy has been informed by National Planning Policy Statements, regional plans and strategies, and plans and strategies of the Council and its partners.
- 1.7 The Core Strategy timeline of 15 years, 2011 – 2026, meets the requirements of PPS12 section 4.13 and shows long term, strategic planning.
- 1.8 The Core Strategy can be demonstrated to be in line with the requirements set out by paragraph 4.1 of PPS12 in terms of:
- setting out a spatial vision for the future pattern of development, with clear objectives for achieving that vision (sections 1.51 and 1.5.6);
  - chapters 3 -7 detail the spatial strategy for Haringey, with 16 strategic policies and
  - Delivery and monitoring are set out in Chapter 8. The Community Infrastructure Plan provides detail on the delivery of infrastructure.
- 1.9 In relation to PPS12 paragraph 4.44, Haringey’s Core Strategy can be shown to be effective through:
- Deliverability as set out in the Council’s Community Infrastructure Plan;
  - Flexibility as the Core Strategy has been written to allow adaption to changing circumstances; and
  - Monitoring as set out in Chapter 8 and the supporting Monitoring Framework.
- 1.10 Haringey Council took part in the PINS frontloading programme in 2009, and the final report by the Inspector provided focused advice on what to aim for in the Core Strategy, including the importance of a clear vision and the role of the document in setting out spatial distribution to growth along with infrastructure provision.

### **London Plan**

- 1.11 As mentioned in the response to Matter 1, the Council considers the Core Strategy and its schedule of changes to be in general conformity with the London Plan and its draft replacement.
- 1.12 Although the Core Strategy has been drafted to provide a locally distinctive policy for Haringey that does not repeat regional guidance, the evidence underpinning SP1 and how the borough will manage

future growth is consistent with the Mayor's spatial strategy for London.

- 1.13 Haringey Heartlands and Tottenham Hale will be the key locations for the largest amount of Haringey's future growth. They are identified in the London Plan as an Area for Intensification and an Area of Opportunity respectively (London Plan policy 5B.2 and policy 2.13 of the replacement plan).
- 1.14 Throughout the Core Strategy, the approach to the strategic policies reflects the London Plan, and are referenced accordingly. For example, SP2 Housing seeks 50% affordable housing with a tenure split of 70% social and 30% intermediate housing, as set out in Policy 3A.9 of the London Plan, SP8 sets out an employment land hierarchy for Haringey reflecting the Strategic Industrial Land designation in policy 3B.4 of the London Plan and policy 2.17 of the replacement plan. Similarly, SP10 focuses on sustaining and enhancing the vitality and viability of the borough's town centre hierarchy, including Wood Green Metropolitan Town Centre, as set out in Policy 2A.8 and Annex 1 of the London Plan and Policy 2.15 of the draft replacement.
- 1.15 Therefore, it is considered that the Core Strategy is in general conformity with the London Plan and its draft replacement and does reflect the guidance of PPS1 and PPS12.

## **2. Issue 1.2**

- 2.1 Please see the Council's Factual Statement 1 'the Sustainability Process' for a response to this Issue.
- 2.2 In addition: The Core Strategy and a number of the supporting documents use the Greater London Authority (GLA) population projection (GLA Demographic Projections 2007). The Core Strategy sets out how it will respond to these projections, which, along with the Housing Trajectory, indicate the level of future growth and where the growth is likely to be. GLA projections are updated annually to reflect latest fertility/mortality, migration forecasts and planned development. GLA projections are used as a preference to trend based ONS statistics as they link population and household change to borough capacity.

## **3. Issue 1.3**

*Does the CS reflect local distinctiveness adequately?*

- 3.1 Yes, the Core Strategy does reflect local distinctiveness.
- 3.2 Throughout the Plan there is no unnecessary repetition of national or regional policy and it focuses on the specific needs and aspirations of

Haringey. The Core Strategy is in line with other local strategies, including the Sustainable Community Strategy (SCS), the Local Implementation Plan (LIP), and Haringey's Greenest Borough Strategy, to deliver the local vision and objectives for the borough.

- 3.3 The Core Strategy was developed through numerous consultations with local residents and other stakeholders and the approach taken and the policies in the plan reflect local knowledge and local aspirations. During the Preferred Options Consultation May/June 2009 there were a number of comments which referred specifically the lack of local distinctiveness throughout the strategy. This was taken on board and the Proposed Submission document aimed to address this gap. (For further details on consultation process and responses please see the Statement of Consultation as submitted to Inspector March 2011).
- 3.4 The introductory chapter to the Core Strategy sets out Haringey's unique position in the London wide and North London sub regional context (Section 1.2); Haringey's local context and characteristics with a specific focus on the seven identified neighbourhoods (Chapter 1.3) (Please see Schedule of Minor Changes as submitted March 2011 shows proposed amendments from representations received to consultation May/June 2010); the specific challenges facing Haringey (Section 1.4); and the vision for the borough over the plan period (Section 1.5).
- 3.5 Throughout the Core Strategy, the policies focus on Haringey's needs, challenges and delivery capacity for development, environmental protection and provision of services and infrastructure.

#### 4. Issue 1.4

*What evidence underpins SP 1 and is this base robust and credible? Does the CS provide sufficient detail on how much development is intended to happen where and when? By what means it will be delivered? Is the delivery strategy for achieving the objectives adequate? Should the strategy and various visions include greater clarity upon the quantum of development in individual areas? Should there be targets (indicative?) for creations of jobs/employment/business space?*

- 4.1 The Council's approach to sustainable growth is in line with the Government's key principles to sustainable development as set out in PPS1 paragraph 27. SP1 is the key policy to managing future growth in the borough for 15 years and it is supported by a number of studies and evidence base, in line with paragraph 4.37 of PPS12.
- 4.2 In accordance with PPS12, Core Strategies need to provide direction of the spatial structure, choices and arrangement of facilities. The

Core Strategy, SP1 Managing Growth, articulates this by identifying areas for sustainable growth. These are framed by policies and defined spatially on the Key Diagram and Proposals Map.

- 4.3 The growth approach is consistent with PPS3. Growth through new housing is of the size, type, tenure and cost profile that addresses local need, in locations that makes efficient use of facilities and of previously developed land. It is also consistent with PPS4, as “it makes the most efficient and effective use of employment land in a manner that balances Haringey’s housing delivery with contribution to national prosperity, local employment and economic activity.
- 4.4 The Core Strategy and a number of the supporting documents use the Greater London Authority (GLA) population projection (GLA Demographic Projections 2007). The Core Strategy sets out how it will respond to these projections, which, along with the Housing Trajectory, indicate the level of future growth and where the growth is likely to be. GLA projections are updated annually to reflect latest fertility/mortality, migration forecasts and planned development. GLA projections are used as a preference to trend based ONS statistics as they link population and household change to borough capacity.
- 4.5 As set out in paragraph 2.13 above, Haringey Heartlands and Tottenham Hale will be the key locations for the largest amount of Haringey’s future growth. These growth areas are consistent with the London Plan and draft replacement London Plan.
- 4.6 The preparation work for the Core Strategy included a Sustainability Appraisal (SA) to assess its environmental, social and economic impacts. This has helped to make sure the Council's strategy and policies are sustainable by identifying any potential harmful impacts and suggesting ways to minimise them. It also helped to identify how to maximise beneficial impacts during the lifetime of the plan.
- 4.7 The Core Strategy is considered to be justified by up-to-date evidence. A significant number of relevant studies and pieces of research were carried out to inform the preparation of the Core Strategy. The supporting text in each section in the Core Strategy references the relevant supporting documents.
- 4.8 Haringey’s housing land supply evidence has been updated recently through the London Strategic Housing Land Availability Assessment (SHLAA) (2009). This was informed by previous, and has informed the latest, Housing Trajectory which is published in the Core Strategy, and the Annual Monitoring Report.
- 4.9 The Core Strategy employment projections are based on the Employment Study 2009, and the London Plan (2008) which provides employment growth projections for the North London sub-region.

These projections forecast future growth based on past trends. Haringey recognises the recent downturn will have an impact on these projections yet are committed to contributing to London wide and local employment target.

***Does the CS provide sufficient detail on how much development is intended to happen where and when? By what means it will be delivered***

4.10 Where available from evidence studies and the London Plan, the Core Strategy does provide sufficient detail on how much development is intended to happen where and when. SP1 sets out a 3 tier approach to development in terms of the quantum of growth expected to take place in each area – high, medium and low - London Plan growth areas, Areas of Change and Areas of limited change.

4.11 SP1 does set out a 15 year housing target for the borough and includes indicative housing numbers for the London Plan growth areas. However, to provide clarity and more information on how much development is intended to take place across the borough, the Inspector is asked to consider the following changes:

To ensure consistency with the DRLP, insert following wording at end of last sentence in first paragraph of SP1:

*'...and an additional indicative target of 3,400 from 2020/21-2025/26, until a new housing target is adopted by the Mayor in his replacement London Plan which the Council will meet and exceed thereafter.'*

In the third bullet point in SP1 replace '5,175' with *'approximately 5,000'*

For consistency, in paragraph 2.1.2 replace '11,195' with *'13,000'*

4.12 For clarity, to be inserted after paragraph 3.1.5 of the Core Strategy:

*"The following housing figures are indicative ranges in these broad areas over the plan period*

Location & total number of dwellings	0-5 years (2011/12 - 2015/16)	6-10 years (2016/17-20/21)	11-15 years (2021/22-2025/26)
Haringey Heartlands 1635 units	150	1285	200
Tottenham Hale 3410 units	1710	1600	100
Wood Green Metropolitan Town Centre 362 units	0	320	42
Northumberland Park 325 units	50	200	75
Seven Sisters Corridor 767	527	240	0
Tottenham High Road 623 units	245	202	176

- 4.12 New housing will be delivered through the development of available, suitable and achievable sites identified through the work on the SHLAA (2009), the borough's housing trajectory, information on planning permissions and discussions with key delivery partners. The growth areas identified for housing are supported by the sustainability appraisal.
- 4.13 In addition, Area Action Plans (AAPs) for the growth areas will add detail regarding some of their large sites and their delivery programme for housing and mixed use development (including residential).
- 4.14 Outside the AAP areas, other large sites will be identified in the Site Allocations DPD. Detailed policies guiding the location and type of residential development will be set out in the Development Management DPD.
- 4.15 As a significant amount of the Council's housing capacity comes from its growth areas - Tottenham Hale and Haringey Heartlands - and the Council's approach is to meet and exceed its London Plan target, failure to deliver planned growth in this area would require a review of the Core Strategy and housing trajectory. The AMR process will ensure this review is properly carried out.

***Is the delivery strategy for achieving the objectives adequate?  
Should the strategy and various visions include greater clarity  
upon the quantum of development in individual areas?***

- 4.16 It is considered that the strategy and visions for the various areas set out in SP1 do include sufficient information for the purpose of this strategic policy. The Area Action Plans proposed for these areas will include detail around the quantum and type of development, mixed use (including residential) and the delivery programme.
- 4.17 Furthermore, this approach is consistent with paragraph 4.7 of PPS12. As the Core Strategy looks to the long term, it is not advisable to include site specific detail which can date quickly. Therefore, providing the detail on site specific criteria through an Area Action Plan is sufficient.

***Should there be targets (indicative?) for creations of  
jobs/employment/business space?***

- 4.17 Where available from evidence, indicative job targets for Haringey Heartlands and Tottenham Hale are set out. For the other areas, through the area action planning process, factors such as employment floorspace projections, job targets and the programming of infrastructure will be addressed.

**5. Issue 1.5**

***Has the production of the Core Strategy followed the SCI? Has this led to timely, effective and conclusive discussion with key stakeholders on what option(s) for the CS are deliverable?***

- 5.1 Haringey's Statement of Community Involvement (SCI) (updated) 2011 sets out how the Council engage with the local community through the plan making process. The preparation of the Core Strategy followed these processes.
- 5.2 The Consultation Statement prepared under Regulation 30 sets out how the Council involved the community and statutory bodies in the consultation process, and the results at each stage and how this shaped the Core Strategy.

**6. Issue 1.6**

***To what extent has the production of the CS followed the LDS?***

- 6.1 The production timeframe of the Core Strategy followed the LDS as closely as possible and where and when necessary the LDS has been reviewed and updated to reflect progress on documents and milestones met, and to accommodate additions or changes to national

and regional guidance, the schedule, or changes to the available resources for the production of the Core Strategy.

- 6.2 Each revision and amendment to the LDS was agreed by the Council's Executive and submitted to the Secretary of State.
- 6.3 The Council produced the first LDS in 2006, which covered the period 2006-2009. This was then reviewed in 2007 to reflect the introduction of new DPDs. This covered the period 2007-2010. In 2008 and 2009 the LDS was updated as necessary. The LDS was then reviewed in March 2010, and revised in September 2010 to cover the period 2010-2013.
- 6.4 Where Core Strategy production has not met LDS milestones this can be equated to limited resources; changes to national, regional and local strategies and guidance; or other unforeseen circumstances.

## 7. Issue 1.7

*Is the CS aligned and coordinated adequately with the Sustainable Community Strategy? Are there areas of discord/omission?*

- 7.1 In accordance with PPS12 the Core Strategy is required to be in alignment with the priorities identified in the Council's Sustainable Community Strategy (SCS).
- 7.2 Haringey's Core Strategy is fully in line and coordinated with the SCS, as evident in the structure of the Core Strategy and the shared objectives and priorities (Section 1.5 of Core Strategy).
- 7.3 Haringey's Core Strategy gives spatial interpretation to the SCS's key outcomes and the strategic policies fit into the broad SCS priorities.
- 7.4 The Council's strategic objectives take forward the SCS's strategic outcomes and sets out the basis for the Core Strategy and its key policies. These objectives give direction for the spatial strategy set out in Section 2.1 of the Core Strategy and are developed further in the core policies.
- 7.5 Through close working with our corporate policy colleagues and Haringey's Strategic Partnership, it is considered that the two strategies are well coordinated and the Core Strategy is capable of delivering the spatial objectives of the SCS's outcomes. It is considered that there are no areas of discord or omission. This is further evidenced by GOL's response to the Core Strategy Proposed Submission:  
*'... There is a strong link between the overall strategy and individual policies of the Core Strategy and Haringey's Sustainable Community Strategy. This means that the Council should achieve the strategic*

*outcomes of the SCS set out in paragraph 1.5.3. The Core Strategy's proposed approach represents a realistic option which is likely to provide good opportunities for growth and change across the borough.'*

## **8. Issue 1.8**

***Does the Core Strategy contain sufficient justification of its policies?***

***Is more explanation needed of how the policies relate to the key issues and spatial objectives?***

***Is it sufficiently clear how the policies meet the needs of the borough identified in the course of the Core Strategy preparation?***

- 8.1 It is considered the Core Strategy sufficiently justifies its policies, in line with PPS12 paragraph 4.36. The policies have been informed by a robust and up to date evidence base, made up of participation outcomes (please see Statement of Consultation) and research studies (please see Supporting Documents submitted March 2011); and have been assessed by a Sustainability Appraisal to measure their social, environmental and economic impacts against alternatives (please see Sustainability Appraisal).
- 8.2 It is considered that the policies sufficiently explain how they relate to the identified key issues and spatial objectives. Section 1.4 of the Core Strategy sets out the key challenges and issues facing Haringey which will be addressed through the strategic policies. The strategic spatial objectives are set out in Section 1.5 and these form the basis for the Core Strategy policies.
- 8.3 Each strategic policy highlights how it will address the relevant challenges and take forward the spatial objectives. In the introduction to each policy, or policy area (e.g. SPs 4, 5 and 6) it is clearly set out how the policy will contribute to the spatial and strategic priorities. Each policy has the capacity to address a number, and combination, of the key issues. The introductory and supporting text of each policy sets out how the policy will address these key issues.
- 8.4 The overall spatial strategy of the Core Strategy, key issues identified and the policies themselves are a result of consultation with the local community, statutory bodies and other stakeholders. It is considered that the Core Strategy reflects the needs of the borough as identified by the Consultees throughout the preparation of the document. The Statement of Consultation March 2011 shows the process and outcomes of each stage of consultation in the preparation of the Core Strategy. This statement shows a clear progression of how each stage was developed from the outcomes of the previous stage. From this process the overall direction and approach of the strategy was agreed and key issues facing Haringey were identified. The Core Strategy

policies reflect how these key issues will be addressed over the plan period.

## 9. Issue 1.9

### *Does the CS acknowledge adequately border issues?*

- 9.1 Yes, the Core Strategy does adequately acknowledge border issues.
- 9.2 Haringey's Core Strategy recognises the borough's position in the north London, London and South East of England context, and cross-boundary issues are addressed throughout the Core Strategy. Section 1.2 highlights Haringey's strategic location in the London-Stansted-Cambridge-Peterborough growth area (Figure 1.3, page 10); and Haringey's important role in north London.
- 9.3 Haringey works closely with neighbouring boroughs to ensure a consistent approach is taken in relation to growth areas and town centres which straddle borough boundaries. As such, discussions have taken place with Hackney in relation to the redevelopment of Woodberry Down, with Enfield and Waltham Forest in relation to Central Leaside.
- 9.4 Additionally, wider partnerships have been established to address sub- regional issues, such as housing and waste. A sub-regional Strategic Housing Market Assessment was prepared for the North London housing sub-region which includes Barnet, Camden, Enfield, Hackney, Haringey, Islington and Westminster, to address the housing need which arises in the sub region. The North London Waste Plan was prepared for the seven North London waste authorities Barnet, Camden, Enfield, Hackney, Haringey, Islington and Waltham Forest. These cross boundary studies have been used to inform Haringey's Core Strategy.
- 9.5 Haringey also works with the GLA, LDA, TfL, NLSA and the London boroughs of Enfield and Waltham Forest to develop and implement solutions to cross boundary issues which affect the Upper Lee Valley growth corridor in the next 15 years, and to develop a new vision for the Upper Lee Valley to guide the future of the area over a 20-30 year period.
- 9.6 Other action areas of the borough which require partnership working with neighbouring boroughs include:
- South Tottenham and Stamford Hill
  - Bounds Green and the North Circular Road corridor
  - Highgate
  - Finsbury Park and Manor House - with major regeneration projects at Finsbury Park station (in Islington) and at Woodberry Down (in Hackney)

- 9.7 There are also major redevelopment proposals in adjoining boroughs which will have an effect on the borough, for example Cricklewood/Brent Cross area and London 2012/Stratford City.
- 9.8 The Core Strategy illustrates a number of the adjoining areas of growth on the key diagram to highlight their proximity to Haringey and how this growth may impact on the Core Strategy proposals.
- 9.9 SP17 specifically addresses cross boundary working as an important mechanism of how the Council will deliver the Core Strategy. Over the plan period, the Council will continue to work with neighbouring boroughs and the wider north London sub-region to ensure that the Core Strategy takes accounts of their plans and programmes. SP17 sets out the importance of close working with neighbouring boroughs to ensure a consistent approach to growth areas and town centres which straddle borough boundaries.
- 9.10 Specific issues relating to cross boundary and bordering areas of growth and change on, for example, demand for housing, infrastructure, transport and health services, will be included in more detail in the relevant proposed Areas Action Plans.

## 10. Issue 1.10

***Proposals map – are the changes proposed sufficiently clear and comprehensive? Are the saved policies of the UDP clear and referenced?***

- 10.1 The Proposals Map is considered sufficiently clear and comprehensive. The series of map extractions and the corresponding table, submitted March 2011, show up to date changes to the current UDP Proposals Map, and acts as a link between the current UDP Proposals map and the envisaged Proposal map which will accompany the Core Strategy.
- 10.2 The final adopted version of the Core Strategy will be accompanied by a Proposals Map which will illustrate any designations which supersede those currently shown on the UDP Proposals Map. It is intended that the designations shown on the map extractions will be incorporated into the Core Strategy Proposals Map.
- 10.3 The Inspector is asked to consider the following proposed minor change to end of paragraph 1.1.6:

*‘See Appendix 1 for details on saved UDP policies.’*

- 10.4 Appendix 1 will be updated to reflect the correct DM policies, when that DPD is completed.

## 11. Issue 1.11

***Are/should Areas of Change (and Areas of Limited Change) to be defined – are such definitions necessary for the suitable application of policy?***

11.1 In preparing the Core Strategy and the Sustainability Appraisal, the Council took a three tier approach to development with areas of high, medium and low growth. Areas of high growth are those identified as Opportunity Areas and Areas of Intensification (i.e. Tottenham Hale and Haringey Heartlands respectively); areas of medium growth have been identified in the Core Strategy as 'Areas of Change'; and areas of low growth have been identified in the Core Strategy as 'Areas of Limited Change'. This approach was adopted to maximise the growth potential of the borough while keeping development appropriate to the local context, needs and capacity.

11.2 For clarity of this approach, the Inspector is asked to consider the following minor change, to be inserted after paragraph 3.1.5:

*'Growth Areas – these are areas with the greatest capacity for growth. It is expected that the most significant amount of houses, jobs and infrastructure will be delivered in these areas over the plan period. Areas of Change – these are areas with considerable potential for growth, though on a lesser scale than growth areas. These areas are appropriately located to support growth and contain identified sites which are available and suitable for development. Areas of Limited Change – these are areas in which expected growth is likely to be small scale and be of an incremental nature.'*

11.3 The definitions of these areas will not impact on the application of the policy. Schemes will be assessed in line with all relevant strategic policies such as, design, delivery and monitoring, town centres, housing and conservation. Schemes are determined on an individual basis through negotiations, scheme viability assessments and driven by up to date assessments of local need, e.g. housing, employment, health, leisure, open space etc.

## 12. Issue 1.12

***What evidence supports the need for a business relocation strategy within the Haringey Heartlands and an energy centre for the Eastern Utility Lands?***

12.1 The need for a business relocation strategy is identified for the Eastern Utilities land in the Haringey Heartlands Development Framework (2005) page 33-36. The Council will require any planning application for the Eastern Utilities lands to be accompanied by a relocation strategy to identify how and where existing businesses located in the

area will be relocated and a timetable for implementation of the strategy. For the current planning for the Clarendon Square by the National Grid and the Local development Agency, this means the relocation of the Olympia Trading Estate.

- 12.2 The need for a site-wide energy centre for this area is identified through the Greenest Borough Strategy and its associated studies Carbon Reduction Scenarios. This is supported by the Core Strategy policy SP4 Towards a Low Carbon Borough and is in line with the London Plan and the draft London Plan. The current planning for Clarendon Square, submitted by National Grid and the Local Development Agency, includes a proposal for Combined Heat and Power system on a site-wide basis details of which are yet to emerge.

**13. Issue 1.13**

*Are the designations within the CS relating to Wood Green clear and coherent, are they justified by the evidence base? i.e. Wood Green Growth Area, Wood Green Town Centre, Wood Green Area of Change, Wood Green Area of Intensification and Wood Green Area Action Plan? Why expand the Area of Change (which includes residential) beyond the Town Centre and Heartlands Area? Could site redevelopment be more effectively resolved by use of planning briefs?*

- 13.1 The designations within the Core Strategy relating to Wood Green are fully justified by the evidence base. While the designations as outlined above for Wood Green may be separate and distinct, they are not mutually exclusive designations. Each designation overlaps and interacts with one or more of the other designations and, as a whole, the designations are dependant upon one another to completely encapsulate Wood Green as it exists now as well as the Wood Green that it is envisaged will evolve over the life time of the Core Strategy.
- 13.2 Firstly, Haringey Heartlands/Wood Green is identified in the London Plan as an Area of Intensification. One of Haringey's 'Growth Areas' set out in SP1 Managing Growth, it is identified to accommodate the majority of the borough's growth over the life of the Core Strategy.
- 13.3 Secondly, Wood Green is one of London's 11 Metropolitan Town Centres, identified in the London Plan. It is recognised that the development of the town centre involves more than additional retail floorspace (as set out in SP10 Town Centres) but could be mixed use, including residential.
- 13.4 A Wood Green Area Action Plan is proposed to take forward the development of the Metropolitan Town Centre (the SPD boundary) to promote a sustainable future for the town centre.

13.3 While the Council are minded to expand the boundary for the Area of Change surrounding Wood Green, the process of producing an Area Action Plan will allow the Council to fully evaluate any change or extension to the Area of Change boundary.

**14. Issue 1.14**

***What evidence supports bullet 3 on page 74?***

14.1 This aspiration was carried forward from the Seven Sisters Neighbourhood Plan 2009-2025 produced by The Bridge New Deal for Communities (NDC) and Haringey Council, which suggested the area may benefit from a landmark building/development as a tool to strengthen the areas identity.

14.2 Any proposals for landmarks/gateway developments will be included in the proposed Seven Sisters Area Action Plan (AAP). The AAP will include a characterisation study detailing suitable density characteristics for the area and all development will be in line with design and conservation policies, as well as other relevant regional and local policies.

**15. Issue 1.15**

***Does the Council's aspiration for Haringey Heartlands/Tottenham Hale address adequately the need to provide necessary open space, play areas and community facilities?***

15.1 The Council believe that the aspiration for Haringey Heartlands and Tottenham Hale does adequately address the need to provide necessary open space, play are and community facilities. The aspirations for each area are set out on page 63 (Tottenham Hale) and page 61 (Heartlands).

15.2 The details of the aspirations and the emerging schemes for each area are discussed separately below.

**Heartlands**

The aspirations for Heartlands include the following:

- Provision of green infrastructure projects to address a range of environmental issues
- An excellent public realm with a network of safe and attractive places both public and private
- A mix of uses including...community/leisure facilities
- Access and other associated infrastructure works

Implicit in the above aspirations are a desire to provide the necessary open space, play area and community facilities.

- 15.3 As part of the negotiations on the current application it can be confirmed that play areas will be provided and that the private amenity space does meet Haringey standards. While there is a shortfall on the public open space, to meet the SPD standards in full would take up a very substantial part of the site (making a redevelopment totally unviable). The Council have balanced the viability of any proposal against the standards set out in its Open Spaces SPD and. As a result, there are current ongoing discussions regarding a s106 Agreement relating to both Clarendon Square and Coronation Sidings (parts of Heartlands) and these discussions will include the requirement to open up the development to existing open space at Alexandra Park. Access to the Park can be opened up by extending the existing Penstock footpath into Alexandra Park to provide a walk/cycle path. Details of the amount or type of s106 are currently evolving and the EiP will be updated on any progress. The Council considered that the improved access to Alexandra Park is deliverable and will provide an improved access to Alexandra Park from the surrounding areas, including development at Heartlands. In part, therefore, the increased access to local open space will serve the residents of Heartlands.
- 15.4 The improved links to Alexandra Park will, in line with the provisions of the Open Space SPD, form an important part of the requirement to secure additional public open space/recreation facilities as a result of residential development at Clarendon Square.
- 15.5 In addition to the above, the Clarendon Sq. s106 is expected to secure £8m funding for:
- Schools (£5.25m.)
  - Transport (£1m.)
  - Open space improvements (and new access to it) (£0.5m.)
  - Healthcare (offer of up to 1,000sqm. on site for a healthcare facility plus £0.5m. towards healthcare provision)
  - Employment skills training (£0.2m.)
  - Off-site community facility improvements (£0.5m.)
  - S106 monitoring (£0.05m.)

## **Tottenham Hale**

The aspirations for Tottenham Hale include:

- Integration of new and existing communities. Clear and explicit links must be made between new opportunities in Tottenham and the existing community, to ensure regeneration benefits include local people

- 15.6 Implicit in the above aspiration is the need to open up existing open space in the area to the wider community as well as providing additional open space to serve the needs of the new residents arriving as a result of development of the area.
- 15.7 At Hale Village an ecological park and a local park (two separate areas) are being provided. The central local park location will provide a green link across to LVRP and Lee Valley Estates are keen to provide a pedestrian crossing across Millmead Road (subject to agreement with Transport) that will extend this link.
- 15.8 There is also the aspiration to provide the footbridge over the rail lines to connect to the western end of that central park and create a stronger link to the rest of Tottenham Hale to the west - funding that construction (about £3m.+) will always be challenging but is being explored.
- 15.9 The existing open space at Down Lane Park is also being improved. A phased improvement plan is being prepared with the Friends of the Park and the 1st phase of improvements (creating a new play area, BMX track and new planting) is currently under construction and due to be completed in the next month or so (July 2011) - about £150,000 investment.
- 15.10 In addition to the above open space improvements, the developer has built the shell of a 1,000sqm health centre (as required by the s106) and there is provision for a discounted rent for 3 years in the s106. A 60sqm neighbourhood police base has also been built (as a shell).
- 15.11 A youth facility (about 120sqm) may be provided by Newlon in Block N - subject to final agreement (and planning. permission). Also, Haringey are talking with the Church of England to operate a community facility on the ground floor of a potential older persons' supported housing scheme (by Newlon Housing Trust) on the former school site.
- 15.12 The developer is currently seeking a GP practice (or GP consortium) to rent the health centre space on site.
- 15.13 The Council acknowledge that the aspirations for Tottenham Hale as outlined in the Core Strategy could be more explicit in terms of the need to provide necessary open space, play area and community facilities. The Inspector is therefore asked to consider an additional bullet point as a proposed further minor change to be included in the aspirations which states:

*“The provision of additional open space, play areas and community as required by development of the area in order to meet the needs of the resident population”.*

**16. Issue 1.16**

***Is the provision of adequate social infrastructure addressed by paragraph 3.1.18?***

- 16.1 The Council have produced a first Community Infrastructure Plan (CIP) as a supporting document to the Core Strategy and all other DPD documents. The CIP represents an initial infrastructure analysis of the borough and is in line with the provisions of PPS12: Local Spatial Planning which emphasises the need for local planning authorities to work with other delivery agencies to plan for social and other infrastructure needed to ensure sustainable communities within the borough.
- 16.2 The CIP incorporates an audit of existing facilities, identifies current deficits and surpluses, and quantifies additional requirements for services associated with projected population growth and future housing capacity.
- 16.3 The Council are beginning the process of updating the CIP by talking to colleagues and to local providers of services to clarify the most up-to-date position in terms of infrastructure requirements. This update will also provide a critical evidence base to inform the initial work on establishing a Community Infrastructure Levy(s) (CIL) for the borough.
- 16.4 Para 3.1.18 of the Core Strategy is concerned with Wood Green Town Centre. It acknowledges that planning needs to be made for the further intensification of the town centre. The paragraph also refers to a Wood Green Area Action Plan. Wood Green is already the subject of a Supplementary Planning Document (SPD) 2008 which seeks to guide development in Wood Green over the coming years and which sets out a clear and detailed vision for the town centre together with a strategy for its regeneration and development. The SPD sets out eleven clear objectives for Wood Green focused on accessibility, character areas, sustainability, public realm, congestion, building quality, retail, open space, safety, leisure/community facilities and employment. Paragraph 3.1.18 of the Core Strategy sets out that an Area Action Plan (AAP) is proposed for Wood Green and this Plan will set out in more detail how the objectives for the area can be achieved.
- 16.5 While the issue of adequate social infrastructure is not addressed explicitly in paragraph 3.1.18, the level of detail that this would require can more properly be addressed in both the Wood Green Area Action Plan and by reference to the CIP which already sets out in detail where community infrastructure requirements are focused across the borough. 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.



17. Issue 1.17

*Should the provision of new green space be explicitly acknowledged within the Core Strategy, e.g. bullet of table on page 74?*

- 17.1 The second bullet point on page 74 of the Core Strategy sets out several of the Council's aspirations for the Seven Sisters Corridor - "potential for new housing, social infrastructure and community facilities. While the reference to social infrastructure implicitly includes new green space, the Council acknowledges that this could be explicitly stated and asks the Inspector to consider the revision of this bullet point as a proposed further minor change to read:

*"potential for new housing, social infrastructure including the provision, where appropriate and viable, new green space, and community facilities".*

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