

COUNCIL STATEMENT

2. The allocation of sites within the DPD shows a clear correlation to the hierarchy of Growth Areas and Areas of Changes as set out in the London Plan, and Local Plan: Strategic Policies. They combine to accommodate over 62.5% of total residential growth within the borough. A further 13% of residential growth is allocated within the areas of change, leaving approximately 24% across the areas of limited change.

With regard to employment land, great care has been had to protect suitable industrial and warehousing areas within the borough. Generally, where these are designated and lie in lower-PTAL areas, they have been protected for intensification over the course of the Plan for their existing uses. Where regeneration areas are identified, and site allocations provided, it is clear that the first aim of redevelopment is to improve the employment offer on the site. This can be done in a number of ways, but the employment site viability study has identified that in the vast majority of cases, new employment floorspace developed in the borough will require some level of residential cross-subsidy. Where this cross-subsidy is required, it will require to be viability tested, to ensure that the optimal employment offer is created, when having regard to the design of each site, including the mix of affordable and private housing on each site.

With specific regards to heritage, the potential impacts on the development sites of being located close to, or in/on parcels of land with identified heritage value has been set out in each Site Allocation. It is hoped that this will provide a “hook” upon which the detailed heritage and design policies of the Plan can be implemented when determining applications.

3. The infrastructure planned to accommodate the needs of the borough’s growing population are identified in the Council’s Infrastructure Delivery Plan Update 2016. The methodology used includes consideration of existing need, as well as that emerging from new development. This has helped to identify the location for new schools and health facilities, which have been included in relevant site allocations.
4. The indicative capacities as identified in the Appendices to the Site Allocations DPD and Tottenham AAP contain sufficient capacity to meet objectively identified housing need, as set out in the London Plan (1,502 new homes per annum), and the Council’s SHMA (1,354 new units per annum).
5. The Local Plan: Strategic Policies DPD contains a criteria-based policy which can be used to determine the suitability of a site for accommodating gypsy or traveller pitches. In addition to this, Policy DM38 identifies former employment sites which will come forward for regeneration as being potentially suitable for accommodating

this use. This is on the basis that these sites exhibit particularly large differentials between existing, and alternative land values, and therefore offer a unique opportunity for flexibility in design of the site. The Policy (DM38) is considered to create significant opportunities to accommodate pitches in the borough to meet the locally identified need.

6. The Strategic Policies, Development Management Policies, and Site Allocations together present a twin-track approach to the management of employment land in the borough. Firstly, there are a significant number of Designated Employment Areas which are to be retained. These will continue to perform a manufacturing and logistics role which is crucial to Haringey and London's economy. The second approach relates to employment sites which are generally low density, and often low quality or approaching the end of their functional lifespan, in highly accessible areas. On these sites, a Regeneration Area designation has been allocated, which seeks to create an increase in jobs on the site, while allowing cross subsidy from a more valuable use. It is considered that this will help to achieve a restructuring of Haringey's economy towards higher-density employment uses, while yielding an increase in employment floorspace overall.
7. All of the site requirements and development guidelines are considered to be deliverable. While it has not been possible to cost every intervention against a viability assessment, the content of each Site Allocation has been considered in the light of what a site would need to achieve in order to make it acceptable in planning terms, and therefore to deliver the objectives of the Plan. The Development Management and Strategic Policies within the Local Plan provide significant flexibility regarding how applications for development will be considered, with viability being a key consideration. Indeed, due to the scale of development on each allocation, it is considered that a bespoke viability assessment will be required on each application for development of an allocation. The requirements and guidelines are intended to shape the way a developer approaches the site, to ensure an appropriate development comes forward. The constraints and opportunities which are identified in the Site Allocations will shape the densities and layout of development on each site. In order to test the mix of uses on allocated sites across the borough, a Site Viability Study (Document 84 in the Submission library) was commissioned. It was as a result of this study that the overall affordable housing target was lowered to 40% (from 50% in the original Local Plan: strategic Policies) to recognise that development viability is an issue in parts of the borough.
8. The broad locations for development have been identified through the Local Plan: Strategic Policies, which is subject to Alterations. While the borough-wide spatial pattern has not been altered from that adopted in 2013, alternative have been tested through the Sustainability Appraisal to the Alterations to the Strategic Policies, which has reconfirmed that the existing spatial strategy is still the most appropriate when considered against all reasonable alternatives.

9. It is accepted that the provision of a decentralised energy network will be subject to feasibility/viability, as with all policy interventions on sites. In line with London Plan Policy 5.5, Haringey's Decentralised Energy Masterplan (2016), is a technical and financial study that sets out possible energy hub / centre locations and routes for DE networks at an area wide level in the borough. This should be used by applicants to help meet their requirements under London Plan Policy 5.6 and the energy assessment for their Development proposal. Further to this, Development sites are expected to follow the DE 'hierarchy' set out in the London Plan (Policy 5.6) and Local Plan (DM22).
10. The cycling and pedestrian improvements identified in Site Allocations correspond to the Green Grid approach set out in Policy DM20, as well as existing projects such as quietways and Cycle Superhighways. It is considered that establishing access to a sites' surroundings is an essential part of any development. The imposition of a requirement for safe cycle and pedestrian connectivity through the surrounding area is not considered to be an intervention that imposes a viability imposition on a development scheme. Rather it should be seen as a intrinsic part of the design, transport assessment, and essential to the justification of the public benefit of developments.