

London Borough of Haringey

Haringey Local Development Framework

Core Strategy

Statement of Consultation

March 2011

(with amendments January 2012)



Haringey Council

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1 Introduction

- 1.1 The Consultation Statement sets out the Council's approach for greater community and stakeholder participation at all stages in the preparation of Haringey's Core Strategy. The engagement of the wider community in the preparation of the strategic spatial planning policies is crucial to ensure that the Core Strategy reflects the aspirations of the Haringey community and stakeholders. The process of consultation complies with Government Regulations and the Council's Statement of Community Involvement.
- 1.2 The Council is required to prepare a consultation statement under Regulation 30 (1) (d) and (e) of the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 to set out:
 - 1 which bodies and persons were invited to make representations under Regulations 25;
 - 2 how these bodies and persons were invited to make such representations;
 - 3 a summary of main issues raised by representations;
 - 4 how representations have been taken into account; and
 - 5 representations made in accordance with regulation 28, the number of representations made and a summary of the main issues raised in those representations
- 1.3 In the preparation of the Core Strategy, the London Borough of Haringey sought the participation of all communities, stakeholders and statutory bodies at all stages of its development.

2 Consultation on the Issues and Options

2.1 The consultation on the Issues and Options (Regulation 25) document took place from beginning of February to end of March 2008. The aim of this consultation was to engage with as many individuals, communities and organisations as possible to discuss the Local Development Framework process and the specific concerns which should be addressed in the Issues and Options document. The Issues and Options set out 78 questions for consideration and these addressed the key challenges identified for Haringey. These included:

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

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

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

Mail out

2.2.1 The consultation database which was set up for the Statement of Community Involvement (SCI), was used and expanded to ensure that as wide an audience as possible for involvement in the LDF process and the preparation of the Core Strategy. This database is made up of government departments,

public agencies, including statutory bodies, voluntary and community groups, local businesses and individuals.

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

Media

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

Community events and engagement

2.2.4 The Issues and Options consultation took advantage of ongoing community events and meetings to raise awareness of the Core Strategy and to encourage participation in the consultation.

2.2.5 These events included the Haringey Green Fair and the International Women's Day. At these events Planning Policy officers staffed stands with information and promotion material with the aim of engaging with the community, raising awareness and understanding of the Core Strategy, and allowing opportunity for people to get involved in the consultation.

Focus groups

2.2.6 In order to consult with harder to reach groups in the community and to ensure more meaningful involvement, focus groups were held. These were facilitated by consultation specialists and the Planning Policy team.

2.2.7 Planning Aid for London were commissioned in November 2008 to facilitate a workshop to explore certain key issues and options central to the preparation of the borough's Core Strategy with members of the community.

2.2.8 The issues and options were discussed within the structure of three workshops dealing with:

- Housing and Community Facilities;
- Transport, Employment and Training; and
- Environment, Open Space and Leisure.

2.2.9 Although attendance was less than expected, the quality of the local knowledge and understanding of the issues addressed not only at local but borough level was impressive and this is reflected in the reported findings.

2.2.10 Haringey Consult was commissioned by the Council to run a focus group to identify particular priorities of the Black and ethnic minority (BME) communities with respect to the development of the planning policies. These priorities were then considered in the development of the Core Strategy. The topic areas discussed included the following focus areas:

- An environmentally sustainable future;
- Managing development and areas of change;
- Creating a safer, attractive and valued urban environment;
- Creating a vibrant and prosperous economy; and
- Improving health and community wellbeing.

2.2.11 The consultants ran a recruitment drive and 16 members of the public were selected from various BME communities via means of the Haringey Association of Voluntary and Community Organisations (HAVCO) Members Services Directory, Haringey Consult’s memberships and from a public meeting held on the 19th March 2008.

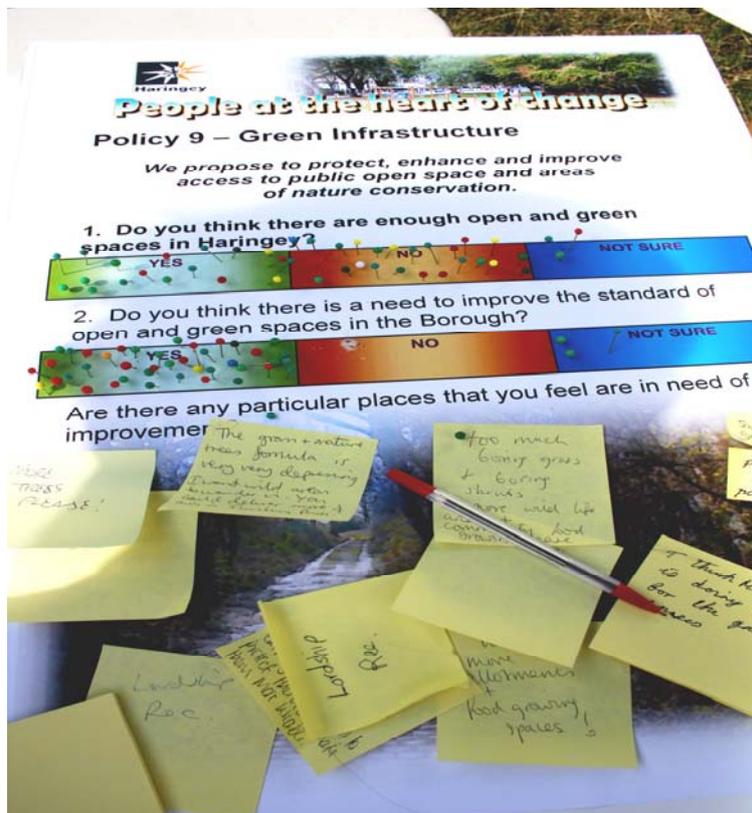


Table 2.1: Summary of Responses to the Issues and Options Consultation Document

	Questions	Response Summary
Objectives and Priorities	<p>Q1. Do the spatial objectives provide a useful approach to identifying the issues and options for Haringey’s future? Q2. Are there any other important objectives that should be included?</p> <p>Q3. Identify area specific priorities and objectives, the Unitary Development Plan divided the borough into eastern, central and western areas. Do you agree with this approach? Are the objectives for these areas still appropriate? Have we missed any key priorities?</p>	<p>Approximately 64% of respondents broadly supported the spatial objectives subject to minor changes, however there were concerns that the objectives are not distinctive to the borough and merely continue London Plan aspirations. The majority of alternative/additional objectives suggested were geared towards improving environmental sustainability. The following additional objectives were suggested:</p> <ul style="list-style-type: none"> ▪ to reduce disparities between eastern and western sides of the borough ▪ to improve quality and size of affordable housing ▪ to reduce the need to travel (PPG13) ▪ to improve the accessibility to local services and amenities. ▪ to produce and distribute food locally ▪ to utilise mixed use development in accessible locations ▪ to increase renewable energy generation ▪ to improve water efficiency ▪ to improve air quality ▪ to consider adaptation to climate change ▪ to improve the attractiveness and value of the urban environment ▪ to increase “greening” and open space within the borough ▪ to protect and enhance biodiversity (PPS9) <p>The division of the borough into east, west and central areas was not commented upon by the majority of respondents. Most responses focused on discrete actions aimed at improving the urban environment in the east of the borough. Respondents that did comment on the division were generally supportive although a small proportion felt that the divisions were unduly prescriptive. Alternative divisions were proposed based on access to health services and public transport interchanges. Some confusion was apparent over the difference between spatial objectives, key priorities, aims and issues, possibly compounded by the interchangeable use of these terms in the consultation document. Proposed key priorities included:</p> <ul style="list-style-type: none"> ▪ Demolishing high density tower blocks ▪ Developing cultural centres in east and central areas ▪ Preserving front gardens ▪ Improving accessibility to River Lee ▪ Enhancing waterborne transport ▪ Supporting town centres <p>Council Response: The Core Strategy will take account of these suggested objectives and will clearly set out a set of objectives and proposed policies to reflect these comments.</p>

	Questions	Response Summary
Climate Change and Environment	<p>Q4. Do you think that the borough should adopt the London Plan carbon reduction targets or seek higher targets?</p> <p>Q5. Should we require all new development to provide a proportion of their energy requirement from renewable sources? Should we require higher renewable energy targets (at least 20%) for major developments on selected sites?</p> <p>Q6. Where developments cannot meet on-site renewable energy targets, should we allow them to make carbon reduction contributions in another way, for example by making a financial contribution to make existing buildings more energy efficient?</p> <p>Q7. Should all developments meet high standards of energy efficiency and environmental performance, taking into account the specifics of the site, technology and cost? or should this only apply to schemes of certain types or certain sizes?</p> <p>Q8. Should we require large development schemes to include decentralised energy / district heating and cooling systems?</p> <p>Q9. Should we build local energy generation and distribution systems?</p> <p>Q10. The Council is considering developing at least one zero carbon development in Haringey by 2013. Do you agree?</p> <p>Q11. How could we encourage households to use less energy? Should we encourage measures to improve the energy performance of existing buildings, for example, by extending energy efficiency measures to the rest of the house when applications are made for extensions?</p> <p>Q12. When considering the impact of solar panels, wind turbines and other 'green' technologies on their surroundings should we treat them in the same way as other building works or give environmental factors greater priority than other considerations, such as conservation/heritage?</p>	<p>The majority of respondents supported exceeding London Plan targets for carbon reduction. A key issue was raised regarding the measurability of the target and availability of baseline data.</p> <p>Approximately half of respondents supported the prescription of renewable sources or on site energy generation in all new development subject to viability and proven carbon emission reductions. Some support was expressed for setting higher targets as part of major developments. The principle of decentralised energy production in large development schemes was supported but assessment of individual schemes was seen as more appropriate than a borough wide policy requirement. Some concern was expressed regarding the possibilities for proliferation of small scale particulate producing energy generation in the absence of a strategic policy to guide scale and location. Exploration of possible anaerobic digestion and waste biomass energy generation was supported. The majority of respondents oppose the development of local energy generation and distribution systems without the support of conclusive environmental and economic benefits.</p> <p>Some opposition was expressed regarding the setting of arbitrary standards rather than adoption of existing standards such as the Code for Sustainable Homes. The GLA insist on adoption of London Plan targets.</p> <p>There was general opposition to the use of commuted sums for renewable energy in the interests of environmental gains and borough wide planning gain priorities, although some developers were in favour of this approach. Energy efficiency was seen as equally, if not more, important than renewable energy use/generation. All respondents felt that high standards for energy efficiency should relate to all development irrespective of size.</p> <p>90% of respondents were in favour of the move toward zero carbon development. A number questioned the specification of one development; some respondents advocated a more ambitious target whilst others advised a more cautious approach, with zero carbon limited to one small development. Natural England advice that one development may be insufficiently ambitious given the volume of development envisaged to 2016.</p> <p>Most respondents felt that energy efficiency in existing households was more appropriately dealt with by building regulations, education campaigns or incentive payments/subsidy rather than the planning system. In relation to development control, respondents were generally opposed to the prioritisation of green technologies over other considerations, especially in regard to conservation and heritage.</p> <p>Council Response: The Core Strategy will set out a policy relating to the Environment, in line with London Plan policies and the Council's Sustainable Community Strategy. The policy will address issues of mitigating against climate change, flood risk, water conservation and quality, air quality, and waste and recycling.</p>

	Questions	Response Summary
Adapting to climate change	<p>Q13. Should we require all developments to include sustainable urban drainage systems and incorporates facilities to reduce water consumption and re-use grey water.</p> <p>Q14. Should we require a proportion of front gardens to be retained with vegetation to reduce surface water run-off?</p> <p>Q15. Should we require design and landscaping measures to reduce overheating and the 'heat island effect'?</p>	<p>Near unanimous support of SUDs where such systems can be implemented. Environment Agency and Enfield Borough Council advise that the need for flood risk management should be set in its wider, cross boundary context in the Core Strategy. Thames Water advice pragmatism with regard to rainwater harvesting and SUDs as such measures are not practicable in all new developments. There was general support for design and landscaping to be used to contribute to natural heating and cooling in new development.</p> <p>The retention of front gardens was generally supported to maintain permeability, contribute to the urban environment and maintain biodiversity. The use of porous materials in any paved areas was also generally supported.</p> <p>Council Response: The Core Strategy will set out a policy relating to the Environment, in line with London Plan policies and the Council's Sustainable Community Strategy. The policy will addresses issues of mitigating against climate change, flood risk, water conservation and quality, air quality, and waste and recycling.</p>

	Questions	Response Summary
Reducing environmental impact	<p>Q16. Should we expect major developments to provide for the sorting and storage of waste to aid waste handling and collection and encourage recycling?</p> <p>Q17. Should we require developments adjacent to or above watercourses to improve the water environment and quality?</p> <p>Q18. What steps should we take to reduce noise pollution in the borough?</p> <p>Q19. Should we require all developments which generate additional travel to introduce measures to manage air quality?</p>	<p>GOL felt that the questions posed with regard to waste did not address strategic concerns. The Core Strategy will need to reflect local waste needs/issues despite inclusion of the detailed policies in the Joint Waste Core Strategy. Respondents generally supported the inclusion of waste and recycling storage as an integral part of major development but some respondents felt a more comprehensive scheme of actions was necessary.</p> <p>Both Thames Water and the Environment Agency support the aim of improving the water environment and quality in line with the North London River Restoration Strategy. A number of policy suggestions were made by the Environment Agency, Thames Water and British Waterways. Other respondents supported the idea that water side development should contribute to improvements in the waterside environment. British Waterways would like to contribute to the development of a design code for waterside development</p> <p>Respondents suggested a number of measures for dealing with noise abatement measures including: specifying low noise surfaces on all new and repaired roads, limiting late night opening of noisy premises and limiting noise generating activities in public open spaces. The majority of responses concentrated on education and enforcement actions to reduce noise that could be carried out by the council. Sound insulation was also mentioned with support given to referencing of the measures in place in the Code for Sustainable Homes. The inadequacy of existing building regulations for sound insulation in conversions was also highlighted as an area of concern.</p> <p>There was support for minimising additional traffic generated as a consequence of new development by maximising public transport opportunities. There was also some support for car free development. GOL questioned the evidence supporting air quality and pollution as problem issues within the borough.</p> <p>Council Response: The Environment policy will include reference to waste and recycling issues, though it is expected to be dealt with in more detail through the emerging North London Joint Waste Plan. The Core Strategy will set out a policy relating to the Environment, in line with London Plan policies and the Council's Sustainable Community Strategy. The policy will addresses issues of mitigating against climate change, flood risk, water conservation and quality, air quality, and waste and recycling.</p>

	Questions	Response Summary
Promoting sustainable travel	<p>Q20. Do you support the sustainable transport measures in the Unitary Development Plan and Local Implementation Plan? Are there other measures we should be promoting?</p> <p>Q21. Where large development schemes are taking place at or near transport interchanges should we require schemes to improve, or make a financial contribution towards, the capacity and accessible of the interchange?</p> <p>Q22. Do you support car free housing, or are there other ways where we can reduce car use?</p> <p>Q23. Should we require new and expanding schools to produce and implement a travel plan to reduce car use?</p> <p>Q24. Do you support the public transport proposals listed in the Unitary Development Plan? Are there any other transport schemes for which we should be safeguarding land?</p>	<p>TfL/GLA response suggests that the Core Strategy should be developed to have a clear, overarching transport policy that guides the transport aspects of development, and is well linked to more detailed transport policies. The list of projects should be amended to reflect funded or committed TfL proposals.</p> <p>The Highways agency response indicated that action should be taken to create a better alignment of jobs, houses and services to minimise the need to travel. Promotion of car free and permit free development in areas with good transport accessibility and maximum parking standards in line with the London Plan were also supported by the agency. Enfield Borough Council sought support for the North Circular Area Action Plan and the West Anglia Route Modernisation Enhancements.</p> <p>There was general support for planning gain contributions to be directed towards a borough wide pool of transport infrastructure contributions subject to viability and achievement of strategic priorities (e.g. affordable housing). Wider use of waterborne transport was also supported.</p> <p>A divisive response to car free development was received with approximately 50% of respondents in favour and 50% against. Respondents suggested research into the operation of existing car free developments within the borough and measures to reduce the need for private car use and ownership such as introducing car clubs, expanding the public transport network and improving walking and cycling infrastructure. A number of specific public transport improvements were suggested with many aimed at improving direct connections between the east and west of the borough.</p> <p>A number of respondents supported retention of 'parkland walk' as a transport corridor with a view to reinstating the Finsbury Park to Highgate Line and supporting Alexandra Palace as a leisure centre. Reactions to an extension of the Victoria line to Northumberland Park were more ambiguous with mixed reactions to the feasibility versus possible regeneration outcomes.</p> <p>Council Response: These comments will be taken into account in developing the preferred approach for the Transport and Movement policy. This will be closely aligned to the objectives set out in the Mayor of London's Transport Strategy. The policy will take into account all local transport considerations.</p>

	Questions	Response Summary
Managing growth	<p>Q25. Should we try to concentrate most growth in identified areas of change and on identified housing sites or should we try to spread growth more equally across the borough?</p> <p>Q26. Should we ensure that all housing development takes place on previously-developed 'brownfield' land? What types of brownfield land should we give priority to?</p> <p>Q27. Should we resist higher density housing where it is poorly designed and does not fit in with its surroundings, or should we set maximum and minimum levels of density, such as the London Plan density standards?</p> <p>Q28. Should we identify locations suitable for tall buildings or identify areas where they are not suitable?</p> <p>Q29. Should we resist the conversion of single dwelling houses into flats or houses in multiple occupation in some parts of the borough? What proportion of conversions in a street is acceptable?</p> <p>Q30. How should we encourage the reuse of empty homes?</p>	<p>The general consensus around the question of growth concentration was that the concentration and dispersal options cannot be considered as mutually exclusive. GOL stress that housing and employment growth should be encouraged in areas with sufficient public transport capacity but that housing will also be needed across the borough. London Borough of Enfield support concentration of growth in identified areas of change to ensure a critical mass for service and infrastructure delivery.</p> <p>Respondents were generally supportive of brownfield housing development subject to consideration of impacts on biodiversity and other types of land use. Back land/back garden development was dismissed except where sites are very large; the majority of respondents opposed the categorisation of garden/back land and allotment sites as brownfield. Redevelopment of existing high density, high rise buildings was supported.</p> <p>The question regarding density was poorly received, GOL felt that the question was ambiguous and did little to convey the fact that the London Plan, including it's density matrix, is an inherent part of the Core Strategy. There was very little consensus regarding density. Approximately one third of respondents felt that density considerations should be decided on a case by case basis, one third according to high design criteria and the final third according to borough-wide maxima set at a moderate level. Tall buildings were another divisive topic. GOL and the GLA recommend setting out suitable and unsuitable locations. Some respondents were supportive of setting out locations for tall buildings but the majority were firmly opposed to the building of any tall buildings within the borough. There was general support for the setting of some restriction on the proportion of conversions to flatted or multiple-occupancy in a particular area to minimise transience in communities. Suggested proportions varied from no more than 5% to 40% although most respondents put forward values between 10% and 20%. A number of respondents felt that conversions should be subject to car-free or restricted parking policies with one respondent suggesting the complete withdrawal of parking permits in conversions. GLA requested reference to the Empty Homes Strategy. The majority of respondents supported the use of CPO powers to bring empty properties back into use. In addition a number of respondents suggested 100% plus levels of council tax to be levied on empty homes.</p> <p>Council Response: These comments will shape the preferred approach for the Managing Growth policy. This approach will be in line with London Plan targets and policies, and will follow other national guidance such as CABE/English Heritage guidance on tall buildings. Further detail on conversions and empty homes will be included in the Development Management DPD.</p>

	Questions	Response Summary
Managing the impact of growth	<p>Q31. Have we identified all the infrastructure implications from future housing growth? Do you think we should 'pool' developer contributions towards infrastructure requirements in certain areas?</p> <p>Q32. Should we restrict or limit development in areas which have insufficient services and facilities, such as schools, health facilities and utility infrastructure and resources?</p> <p>Q33. Should we encourage mixed uses in certain developments and on particular sites in the borough? If so, should this be in the most accessible parts of the borough or should this also apply to other areas?</p>	<p>A very mixed response to the pooling of resources was received. Many respondents were concerned that pooled contributions may be diverted away from the communities directly affected by the development, whilst others saw a strategic benefit over piecemeal infrastructure development.</p> <p>It was felt that the needs of particular areas for social and amenity infrastructure should be investigated and expressed by the council as part of the policy framework; this could then guide development in the future. The majority of respondents felt that development should be restricted in infrastructure deficient areas unless significant action to improve infrastructure as a result of the development was undertaken. Mixed use development was supported in accessible areas of the borough, subject to preservation of 'residential amenity'.</p> <p>A number of respondents, including The Environment Agency, felt that infrastructure implications should also refer to water resources, water management and flood alleviation measures.</p> <p>Council Response: As part of the Core Strategy process the Council produces a Community Infrastructure Plan (CIP) which will set out the costs, timescales and partners required to deliver the different strategic infrastructure needs of the borough. This will include all social and physical infrastructure and the role of green infrastructure and provision of open space.</p>

	Questions	Response Summary
Providing affordable housing	<p>Q34. Should we consider lowering the threshold (from 10 units) at which housing developments are required to contribute to affordable housing?</p> <p>Q35. For smaller sites below 10 units, should we require less than 50% affordable housing, or allow a financial contribution to be made instead of providing units?</p> <p>Q36. Should we require more than 50% affordable housing on very large sites?</p> <p>Q37. What factors may affect the financial viability of providing affordable housing on sites? Should these be taken into account?</p> <p>Q38. What mix of social rented and intermediate housing should we seek? To encourage balanced communities, should this mix vary in different parts of the borough according to existing concentrations of social housing?</p>	<p>There was general support for lowering the affordable housing site threshold in selected areas, particularly to the west of the borough. Respondents appreciated that a financial contribution in lieu of actual affordable housing in some areas of the borough may be advantageous and were generally supportive of financial contributions for 'difficult' sites. There was little support for considering financial viability as a consideration in calculating affordable housing although one respondent highlighted the possibility that the regenerating effects of some schemes may outweigh the contribution direct provision of affordable housing could make.</p> <p>There was some support for applying a differential affordable housing target e.g. 30% in the east, over 50% in the west, although some respondents were against this approach. Proposals for over 50% affordable housing provision on large sites were generally opposed in favour of securing mixed and balanced community development. GLA highlight the need for a 70:30 social intermediate affordable housing split to be maintained across the borough in conformity with the London Plan, however, subject to justification from needs assessments, this could be varied. Variations may also be justified on specific sites provided the 70:30 split is maintained overall.</p> <p>Council Response: These comments will be considered when developing the Housing policy. Additionally, it will be necessary to undertake an affordable housing viability assessment to ensure a robust policy.</p>

	Questions	Response Summary
Providing a range of housing types	<p>Q39. Should we encourage more family housing in developments?</p> <p>Q40. Are larger family homes suitable everywhere in the borough and in all developments? If not, should we specify areas or certain developments which are suitable for family housing?</p> <p>Q41. In which locations should we encourage special needs housing?</p> <p>Q42. Should we encourage more lifetime homes and require more generous minimum floorspace standards for new dwellings and conversions?</p>	<p>There was general support for ensuring an adequate supply of family housing as part of new development throughout the borough based on needs assessments. Respondents were also supportive of ensuring that all housing development is family friendly by restricting use of tall buildings.</p> <p>Respondents supported special needs housing in all locations but felt that access to open space, shops and support services may be particularly important for elderly residents.</p> <p>The London Plan requires all new homes to be built to Lifetime Homes Standards. Lifetime homes are also a component of achieving Level 6 of the Code for Sustainable Homes. Some respondents felt that any local policy was therefore unnecessary and objected to any stipulation especially regarding floorspace which is subject to building regulations. The majority of respondents were extremely supportive of increasing minimum floorspace standards in both new dwellings and conversions.</p> <p>Council Response: These comments will be taken on board and policy on housing will be informed by a North London sub-regional Strategic Housing Market Assessment (SHMA) which will set out housing need and policy implications. Policy will refer to the need for a variety of housing in the borough. The policy will be in line with London Plan and national policies and standards for housing.</p>
Creating high quality buildings and spaces	<p>Q43. Should we resist design that fails to improve the character and quality of an area or should design be considered acceptable provided it does not harm the appearance of an area?</p> <p>Q44. Should we provide specific design guidance for different areas of the borough or should we seek good design everywhere?</p>	<p>Comprehensive response by English Heritage that highlights the need for a sound evidence base regarding the historic environment in support of the Core Strategy. They stress that understanding and valuing the historic environment should be intrinsic to achieving high quality buildings and public spaces. Lee Valley Regional Park Authority would like to see greater policy recognition of the park, supporting its stated priorities and in particular recognising the park as a key driver in the regeneration of the Upper Lea Valley. Natural England are concerned that opportunities for safe guarding and increasing biodiversity and nature conservation are taken as part of the approach to new development.</p> <p>High levels of design quality are supported by respondents who unanimously agreed that the design of development should improve the character and quality of an area and that design standards should be enforced across the borough. Some respondents acknowledged that characterisation of the different areas of the borough could support design objectives.</p> <p>Council Response: These comments will be taken on board when developing the Design policy. The policy will adopt national and regional standards and targets. The policy will refer to local considerations and will set out the preferred approach to achieving high quality design.</p>

	Questions	Response Summary
Improving the quality & appearance of Haringey's public spaces & street scene	<p>Q47. Should we expect all developments to contribute to physical works to streets and public places?</p> <p>Q48. What physical works do you consider best improve the visual attractiveness and use of public spaces?</p> <p>Q49. Are there other approaches to improving streets and public places in Haringey that we should consider?</p>	<p>There was some support for major development to make contributions to public space improvements and for 'Safer by Design' principals to be included in any works involving streets and public spaces. The GLA advised reference to the TfL Streetscape Guidance for schemes involving highway infrastructure on the TLRN (Transport for London Road Network). One respondent advised the Council to ensure that strategic priorities were assessed before setting out a wish list for planning gain contributions.</p> <p>A number of physical works were suggested to improve the urban environment:</p> <ul style="list-style-type: none"> ▪ Retention and expansion of street tree planting ▪ More and improved street planting and maintenance ▪ Introduction of community gardens/food growing areas ▪ Setting development back away from busy roads ▪ Increased public art ▪ Removal of excessive street furniture ▪ Co-ordination of essential signage ▪ Removal of advertising hoardings, limited timings for 'for sale' signs ▪ Reduce traffic speeds e.g. 20mph in all residential streets ▪ Tarmac limited to vehicular crossways <p>A number of approaches to street scene improvements were suggested:</p> <ul style="list-style-type: none"> ▪ Process of working with key groups and residents e.g. Living Streets ▪ Parking enforcement ▪ Comprehensive approach to development within areas of terraced housing to include front gardens, back gardens, backlands development and front and rear aspects. ▪ A junction team to monitor, improve and maintain road junctions. <p>Council Response: The Core Strategy will take these comments into account and will refer to appropriate guidance in shaping the policies. The Design policies will take account of suggestions made and where relevant will incorporate into policy.</p>

	Questions	Response Summary
Protecting, enhancing & improving access to public open spaces & nature	<p>Q50. Should we protect all green open spaces or allow new housing on some sites?</p> <p>Q51. Should we seek to create new parks and open spaces or improve the quality of existing spaces and access from residential areas? How can we encourage better use of our parks and sports facilities?</p> <p>Q52. Should we encourage developments to do more to protect habitats for wildlife in Haringey? What measures should we seek?</p>	<p>Respondents strongly opposed development on green open spaces. The majority of respondents felt that the number and extent of green spaces should be increased and that developments should contribute to wildlife habitats.</p> <p>Natural England are keen to see Haringey link with other boroughs to identify a network of existing and planned green spaces as mentioned in the East London Green Grid Framework and would like to see evidence of how the green space deficiencies in some areas will be addressed. Other respondents were keen to ensure that every opportunity is taken to increase green and open spaces and to maintain existing facilities and green spaces. Some concern regarding building in parks/open spaces as a driver towards increased use but some support for facilities such as cafes to ensure footfall. A number of respondents suggested the re-introduction of park keepers as a key improvement tool.</p> <p>GLA requested reference to the Lee Valley Ramsar Site, Policies 3D.8 and 3D.11 and London Plan guidance on DPD policies for biodiversity. Environment Agency advise that protection and enhancement can be achieved by naturalising river corridors and incorporating buffer zones into waterside development. Other respondents supported the integration of wildlife habitats into new development suggesting measures such as green walls and roofs, bird/bat nesting boxes and the inclusion of 'wild spaces' as part of development.</p> <p>Council Response: The Core Strategy will include a policy relating to Green Infrastructure, i.e. parks, open space, areas of biodiversity importance, woodlands, waterways and tributaries, allotments, amenity space. This will be in line with London Plan policies and ensure protection of these areas.</p>

	Questions	Response Summary
Increasing job opportunities for Haringey's population	<p>Q53. Should we encourage developers to recruit local people and use local businesses and suppliers during the construction of a scheme and its final use, particularly in or near deprived areas?</p> <p>Q54. Should we encourage developers of large schemes to produce an employment and training plan to encourage job opportunities for local people and reduce barriers to work?</p>	<p>The majority of respondents felt that interventions into the recruitment and supply policies of developers were not a matter for the planning system. GOL were concerned that it is not a strategic concern.</p> <p>Some support was expressed regarding the use of local suppliers and local construction materials to contribute towards carbon footprint reduction.</p> <p>Some support was expressed for the creation of employment and training plans with the caveat that developers should not be penalised for non compliance. GLA refer to Policies 3B.1 and 3B.11 of the London Plan and the Mayor's Economic Development Strategy and advised that initiatives to create training and employment opportunities should be provided throughout the borough and not just in or near deprived areas with developers required to produce an employment and training strategy that will address barriers to employment.</p> <p>Council Response: The Core Strategy will include a policy relating to Employment. This will set out how the Council aims to protect and enhance employment land, and promote appropriate forms of employment. This will be in line with London Plan policies.</p>

	Questions	Response Summary
Protecting viable employment land and buildings	<p>Q55. Should we protect all employment land for business and employment use?</p> <p>Q56. Where vacant and surplus to requirements, should we allow employment land to be reused for housing or community uses?</p> <p>Q57. Where under-utilised, should we encourage mixed use development which increases the number and range of jobs on site or provides other regeneration benefits?</p> <p>Q58. Are there locations where we could allocate specific uses or 'clusters' of uses?</p>	<p>GLA strongly support the retention of Strategic Industrial Locations; smaller industrial sites and locally significant employment sites should be protected for industrial activity. Reference should also be made to the Mayor's SPG on Industrial Land. The majority of respondents supported redevelopment of employment sites only where a need/demand assessment could prove it was surplus to requirements with sites evaluated on an individual basis. A number of respondents felt that a loss of employment land in one location should be supplemented by an equivalent designation in view of long term economic needs, the need to reduce travel outside of the borough for employment purposes and retention of units particularly for small businesses. One respondent supported a definition of appropriate employment uses in the Core Strategy to include sui generis employment generating uses.</p> <p>The Mayor's SPG on Industrial Land was referred to; this prioritises reuse of employment sites for housing and mixed use development. Some respondents were keen to ensure that any re-designated employment site includes a mix of uses aimed at improving the economic, community facilities and cultural offer in the borough e.g. creative hubs, live/work units. The majority of respondents supported the mixing of uses on underutilised sites only where the number and range of jobs on site was increased. Some concern was expressed regarding the loss of flexibility introduced by including housing in the mix.</p> <p>Respondents suggested the following clusters: Health related cluster at St Ann's Hospital, Green Industries/green business cluster in Central Leaside, Bruce Grove cultural cluster.</p> <p>Council Response: The Core Strategy will include a policy relating to Employment. This will set out how the Council aims to protect and enhance employment land, and promote appropriate forms of employment. This will be in line with London Plan policies.</p>

	Questions	Response Summary
Strengthening Haringey's town centres	<p>Q59. Should any of Haringey's town centres be increased or decreased in size?</p> <p>Q60. Should the Core Strategy recognise the wider role of town centres as a focus for development?</p> <p>Q61. Should we seek to resist new shopping developments that are not compatible with the character and function of a centres, for example in terms of shop unit sizes and design and protect areas of specialist shopping?</p> <p>Q62. Should we apply stricter controls to restaurants, cafes, bars and clubs and manage the night time economy?</p>	<p>GLA, GOL and LB Enfield support appropriate sizing of town centres informed by retail capacity studies with reference to the London Plan hierarchy of centres. In addition LB Enfield recommends that the existence of town centres in neighbouring districts is taken into account. The Highways Agency recommends strengthening the role of town centres in line with provision of sustainable transport infrastructure to minimise the generation of additional trips. GLA also support the development of specialist centres in line with PPS6 and the Mayor's Economic Development Strategy. Respondents supported the retention, protection and strengthening of local centres as part of local communities.</p> <p>One respondent expressed the need for urgent improvements to Wood Green including a change in policy away from focusing all retail growth at Wood Green. One respondent supported the inclusion of the Sainsbury's store at Williamson Road within the Green Lanes Primary Shopping Frontage in recognition of its anchoring role for Green Lanes District Centre.</p> <p>The need for town centres to cater for a wide variety of uses beyond retail was a priority for many respondents. Cultural, leisure, and business uses were all supported with the caveat that noise generating, late night commercial premises are poor neighbours to residents. Respondents were generally in favour of the Core Strategy intervening in favour of smaller, independent and specialist retailers and against the provision of further supermarket/chain stores. However, some respondents felt that market forces should be allowed to decide the retail offer.</p> <p>There was strong support for a reduction in the number of take away outlets within the borough. Management of the night time economy was also supported although many respondents viewed this as a matter for restriction and control of opening hours rather than positive planning for living urban centres outside shopping hours.</p> <p>Council Response: The Core Strategy will include a policy relating to Town Centres. This will set out how the Council aims to protect and support expansion and intensification of local town centres, and how these town centres fit in with the sub-regional development framework. The policy will set out how town centres can support a variety of complimentary uses to ensure vitality. This will be in line with London Plan policies.</p>

	Questions	Response Summary
Helping our local shops	<p>Q63. What role should our local shopping centres play in future?</p> <p>Q64. Should we increase or decrease the number and size of our local shopping centres?</p> <p>Q65. Should we seek to protect public houses which serve as a local community resource?</p>	<p>Respondents supported the retention of existing local shopping centres particularly where accessible by walking. Council tax reductions for independent retailers were supported as was the use of local centres as local food hubs. The majority of respondents were in favour of retaining public houses as a community resource; a number of respondents opposed the setting out of a narrow definition of community resources.</p> <p>Council Response: The Core Strategy Town Centre policy will address these issues relating to local shopping centres. The policy will aim to protect these shopping centres to maintain the character, function, vitality and viability of the area.</p>
Making Haringey a safer place	<p>Q66. Do you agree with the planning measures to discourage crime and promote safer streets in the borough set out above? Are there other measures that we can take?</p> <p>Q67. Should we require all developments to demonstrate how they have addressed safer and security issues and have 'designed out' crime?</p> <p>Q68. Do crime "hotspots" need a specific approach in terms of community safety and planning? if so, what measures do you think are needed in these places?</p>	<p>The implementation of 'Secured by Design' requirements and 'Safer Places' guidance was supported by all respondents in addition to the proposed measures to discourage crime. One respondent suggested the use of low rise homes for families with gardens and open spaces as key to ensuring safer communities and another the use of green planting to effect a calming effect on the urban environment. The requirements for all developments to demonstrate that they have made efforts to 'design out' crime was generally supported. The consideration of the overall appearance of the street scene and nature of use of key premises was acknowledged to be important in relation to crime 'hotspots'.</p> <p>Council Response: The Design policy will take these comments into account when considering designing out crime. The policy will be in line with London Plan policies, and other relevant national guidance and standards</p>

	Questions	Response Summary
Improving our health and well-being	<p>Q69. Have we identified the right measures that planning can take to improve health and well-being in Haringey? Should we prioritise some of these measure above others?</p> <p>Q70. Should we require all developments to assess health impacts?</p> <p>Q71. Should we take a different approach to planning for health in certain parts of the borough to reflect different health issues and access to facilities?</p>	<p>The Core strategy should recognise the role of the Lee Valley Park and River Lee in tackling health inequalities. Concerns were expressed regarding the proposals for poly clinics and whether these would be in locations to serve communities. Haringey Teaching PCT have provided a comprehensive response to this section that includes a list of key considerations. LB Enfield report that the Barnet, Enfield & Haringey Strategy ‘Your Health Your Future’ only relates to hospital care, not the general health system.</p> <p>The list of measures was generally supported with equitable access to health facilities and safe and accessible leisure facilities supported as priorities. Approximately half of respondents were in favour of the preparation of health impact assessments; GLA highlighted that the preparation of assessments is a London Plan requirement for major development. An evidence based approach to the differing health needs in different areas of the borough was supported.</p> <p>Council Response: The Health and Well-being policy in the Core Strategy will take these comments into account. The policy will address cross cutting health issues with reference to other Core Strategy policies, including green infrastructure, housing and environment. The policy will be in line with health needs identified by Haringey’s Joint Strategic Needs Assessment (JSNA); and the health policies in the London Plan.</p>
Promoting equality of opportunity and access	<p>Q72. Are the measures identified appropriate in promoting equality of opportunity and preventing discrimination in Haringey? Are there other measures that we can take?</p> <p>Q73. Should we expect developers submitting major schemes to commission independent equalities impact assessments?</p> <p>Q74. Do you support the measures to promote accessibility of services and facilities in the borough? Are there other measures we should consider?</p>	<p>The measures identified with regard to equality of opportunity were supported with the proviso that health and recreation facilities should also be included. Equalities Impact assessments were supported by some respondents for larger schemes but were opposed by the majority of respondents. GLA highlight the Mayor’s SPG Planning for Equality and Diversity and request a reference to it in this section.</p> <p>Measure to promote accessibility of services and facilities were generally supported. A lack of publicly accessible toilets was highlighted as a barrier to enjoyment of the public realm, the number of public conveniences should be included as a measure.0</p> <p>Council Response: The Health and Well being policy will make reference to all relevant London Plan policies and guidance. Access to all public facilities will be addressed in the relevant policies.</p>

	Questions	Response Summary
Supporting education and community services and facilities	<p>Q75. What community facilities are needed in Haringey to deal with a growing population in addition to those already identified in current plans and programmes?</p> <p>Q76. Are there certain parts of the borough where particular facilities need to be provided?</p> <p>Q77. Should we require all developments to make a contribution to education facilities and services?</p>	<p>An amendment to the definition of community facilities was suggested as ‘Community facilities provide for the health, welfare, social, education, leisure and cultural needs of the community’.</p> <p>The following community facilities were suggested:</p> <ul style="list-style-type: none"> A hospital in Haringey (upgrade St Ann’s) Younger peoples facilities Older peoples facilities Local health care for age related disorders Music venues Theatre venues Green open space Secure water supply Secure, local sustainable food supply Art gallery Museum Leisure facilities Health facilities Public toilets in town centres <p>An evidence based approach to the location of new community facilities was supported. In addition, a Library was proposed for Green Lanes. Protection and retention of existing community facilities was also supported.</p> <p>Respondents generally supported contributions to education facilities and services for larger development where a proven need had been demonstrated.</p> <p>Council Response: As part of the Core Strategy process the Council produces a Community Infrastructure Plan (CIP) which will set out the costs, timescales and partners required to deliver the different strategic infrastructure needs of the borough. This will include all social and physical infrastructure.</p>

	Questions	Response Summary
Other Options	Q78. Are there any other issues and options we may have missed?	<p>The following areas were felt to have been omitted:</p> <ul style="list-style-type: none"> ▪ Light pollution ▪ Protection of non TPO trees and tree masses ▪ Specific waterside development policies ▪ Consideration of options not in conformity with London Plan policies ▪ Need for environmental infrastructure ▪ Integrated strategic approach to water management (detailed Environment Agency response received) ▪ Contribution that voluntary organisations and religious bodies make to community facilities ▪ Use of 341-379 Seven Sisters Road ▪ Telecommunications policy ▪ Secure local sustainable food supply ▪ Option of low density development to meet, but not exceed London plan targets ▪ Option to convert existing brownfield sites to green public open spaces <p>Council Response: These issues will be addressed, where relevant, in the Development Management DPD and the Site Allocations DPD.</p>

2.3 Response to the Issues and Options

2.3.1 In addition to the responses from the focus groups and community events, a total of 1,250 individual written representations were received from 53 respondents. The majority of representations were in response to the questionnaires sent to consultees. Most responses were received via post and email, while a small number of respondents used the online consultation tool. Collective feedback from workshops and focus groups were analysed alongside the individual representations.

2.3.2 A total of 78 questions were posed during this stage which covered a broad range of topics and themes. The responses to these questions indicated which issues were of highest priority for the respondents. Where appropriate, these responses shaped the options and alternatives for the next stage of developing the strategy.

2.3.3 The Issues and Options Report (December 2007) set out five spatial objectives:

- An environmentally sustainable future
- Managing development and areas of change
- A safer, attractive and valued urban environment
- Economic vitality and prosperity shared by all
- Improving health and community well-being

2.3.4 Following the Issues and Options consultation four broad spatial options were identified to deliver the above objectives. These options represented alternative strategies for achieving the Council's vision for Haringey and took into account comments received during public consultation.

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

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

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



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

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

3 Consultation on the Preferred Options

3.1 The Council published the Preferred Options Core Strategy titled 'A New Plan for Haringey 2011-2026' (equivalent to the Preferred Options report under the previous legislation (Regulation 26)) in May 2009 and asked for comments to be received by 30th June.

3.2 The document set out 12 proposed policies developed from the responses to the Issues and Options consultation. The strategic policies detailed how the Council would manage change over the next 15 years. These were as follows:

- Managing Growth;
- Housing;
- Environment;
- Movement;
- Employment;
- Town Centres;
- Design;
- Conservation;
- Green Infrastructure;
- Health and Well being;
- Culture and Leisure; and
- Community Infrastructure.

3.3 Consultation Process

3.3.1 There was a comprehensive and extensive public consultation programme for this stage of the Core Strategy preparation to ensure wider engagement with the Haringey community, in line with the SCI and the Community Engagement Framework. The methods of consultation employed built on those used at the Issues and Options stage. The database was expanded to include those who had been involved at the previous stage of consultation, and in the ongoing discussions.

3.3.2 The approach taken for this consultation was flexible, accessible and proactive. Notification material was designed to be clear and concise, without any jargon. A number of workshop style events, seminars, meetings, and interactive information stalls were held to ensure wide participation and engagement throughout the borough. Each event and meeting was tailored to the specific focus group, discussing issues relevant to their interests, and consultation was interactive, with discussion groups and workshops facilitated by planning policy officers and consultation specialists.

Notification

3.3.3 All consultees (including specific consultation bodies, government departments, general consultation bodies, resident and community groups and individuals) received a letter of notification and leaflet seeking comments on the proposed policies set out in the Core Strategy.

- A public notice, seeking the views and participation of all residents, was placed in Haringey People which was distributed to every household in the borough.
- Public notices appeared in all local newspapers.
- A publicity poster was placed in all key locations in the borough.
- The consultation document was available to view in all libraries and at 639 High Road, Tottenham and the Civic Centre, Wood Green.
- The consultation document was available to view on the Council website along with an interactive tool for submitting representations, and up to date information on the consultation programme and process.

Stakeholder Engagement

3.3.4 Discussion topics and workshops focused on the 12 policies proposed seeking local views on the content, relevance and comprehensiveness of the policies.

3.3.5 A number of representations were received via the Limehouse Consultation System, email, letter and response form.

3.3.6 A concerted effort was made to engage with hard to reach groups as well as more actively engaged groups.

Community Events

3.3.7 The policy team took the opportunity to engage with a wider audience at two local community summer events Haringey Green Fair and Tottenham Carnival.

3.3.8 There was a range of issues raised at these events, including; town centre improvements; local economic development; safety and urban design; and provision of leisure and cultural opportunities.

3.3.9 Following the success of the focus group facilitated by Haringey Consult for the Issues and Options stage of consultation, the Council commissioned the team to run a follow up focus group.

3.3.10 A total of 16 participants, all local residents, were selected to partake in the consultation with at least two youth participants in each group. Participants were provided with the policy document before they came to the consultation event. Haringey Consult in conjunction with the Council's brief produced a

series of questions which were discussed to evaluate the community's perception and to tackle the proposed policies.

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

Three public consultation events were held as follows:

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

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

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

Community and Residents Groups Meetings

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

3.3.13 The issues raised related to the groups' concerns including family housing, leisure facilities and open space deficiencies, car parking issues and also, wider issues, including transport and accessibility, town centre management, and conservation issues.

Area Assemblies

3.3.14 All seven of the Area Assembly meetings held in May 2009 were attended by planning policy staff. A presentation was made at a number of the meetings, and an information stall was facilitated at all.

3.3.15 The issues discussed varied at each meeting; they included the need for more integrated working between services; design and conservation issues; delivery of strategy and provision of infrastructure. These meetings were a positive forum for raising awareness of the Core Strategy and establishing networks for further involvement.

Partnership Engagement

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

3.3.17 These meetings allowed for professional input and analysis of the relevant policies.

3.4 Equal Opportunities

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

Age

3.4.2 A school programme was rolled out across the borough to engage with young people. This involved focus group workshops with two primary schools and three secondary schools, in East, West and Central Haringey. A total of 135 children and young people participated in the focus groups. Additionally, the team attended the Youth Service Network event. The main issues raised by young people related to safety in their neighbourhoods; the provision of leisure facilities; and town centre development.

3.4.3 Consultation workshops for older people were carried out in partnership with Haringey Forum for Older People. The planning policy team and Haringey Forum for Older People committee organised a half day event which was attended by 80 delegates. A presentation introducing the Core Strategy was followed by a series of café style table discussions, facilitated by committee members and policy officers. All comments and discussion were noted and analysed by the Forum and by the Policy team.

3.4.4 The main issues which emerged from this group related to provision of affordable housing, catering for specific housing needs, improvement to accessibility and safety of parks and open spaces and improvement in urban design to allow ease of access.

3.4.5 The community summer festivals offered an opportunity to engage with a wide range of people of all ages.

Disability

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

Gender

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

Race

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

Religion or Belief

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

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

Sexuality

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

3.5 Main issues from the Preferred Options consultation

- 3.5.1 The number of people engaged during this stage of consultation was significantly higher than the previous stage. The majority of participation took place through workshops, focus groups, information stalls, public meetings, seminars and presentations which equated to approximately 650 people. All notes and feedback from these events were fed into the development of the pre-submission stage. A total of 55 written responses were received, equating to 600 comments.
- 3.5.2 The main issues raised related to the need for more local distinctiveness in the policies and supporting text; more evidence to back up the policies; and the need for specific targets to be included in the policies to ensure high standards in environmental design, housing provision, and issues of sustainability.
- 3.5.3 Representations and comments were taken account of where appropriate and relevant.
- 3.5.4 The main strategic issues raised throughout the consultation are outlined below. The full schedule of responses is available to view on the Council's website at www.haringey.gov.uk/corestrategy/cs-preferredoptions

Table 3.1: Summary of Responses to Preferred Options Consultation Document

Proposed Policy	Summary of Comments	Council's Response
<p>SP1 Managing Growth</p>	<ul style="list-style-type: none"> • The policy should include details of scale and extent of developments, with reference to housing, employment and retail figures • Concerns about Central Leaside Area Action Plan. A broad outline of the scale and type of development should be set out in the Core Strategy given the importance of the area in development terms. • The policy should refer to type and scale of infrastructure required in growth areas • The document should include an additional policy to address planning obligations. 	<ul style="list-style-type: none"> • As part of the Core Strategy process the Council produces a Community Infrastructure Plan (CIP) which will set out the costs, timescales and partners required to deliver the different strategic infrastructure needs of the borough. This will include all social and physical infrastructure and the role of green infrastructure and provision of open space. The CIP also supports SP 12 Community Facilities. More detail around infrastructure provision will be included in the pre-submission version of the Core Strategy. • Joint working on the Central Leaside Area Action Plan has been terminated. Reference to this will be removed in the Core Strategy. • An additional policy relating to planning obligations will be included in the pre-submission version of the Core Strategy.
<p>SP2 Housing</p>	<ul style="list-style-type: none"> • The policy should include density and housing capacity figures and details of affordable housing viability and tenure mix. • The policy should refer to the provision of all housing types to meet local needs. • There is a need to include another policy in the Strategy referring to the needs of Gypsies and Travellers. 	<ul style="list-style-type: none"> • The Pre-Submission Core Strategy document will include density figures and affordable housing targets and housing mix • The Pre-submission Core Strategy will include details of housing types and density figures. • An additional policy for Gypsies and Travellers accommodation needs will be included in the pre-submission document.
<p>SP3 Environment</p>	<ul style="list-style-type: none"> • The policy should set targets for climate change and mitigation beyond minimum standards. 	<ul style="list-style-type: none"> • The pre-submission document will include target for addressing climate change and mitigating

Proposed Policy	Summary of Comments	Council's Response
	<ul style="list-style-type: none"> • The policy should include more specific details on water bodies, especially the River Lee, in terms of flood protection, water pollution, and water conservation. • More evidence is needed to support the policy, such as sequential tests, a Surface Water Management Plan, and energy plan 	<p>beyond minimum standards as set out in regional and national policy.</p> <ul style="list-style-type: none"> • Flood risk relating to planning will be referred to within the pre-submission Core Strategy and the Haringey strategic flood risk assessment, the detailed policy and implementation information will be within the DM DPD and also intended to be within the expected surface water management plan, there are opportunities for joint data share and policy development with both these policy documents. • Further studies and evidence will be carried out to support this policy. • This policy will be expand and separated into three policies to deal more comprehensively with the issues.
SP4 Movement	<ul style="list-style-type: none"> • The policy should set a reduction target for traffic in line with CO2 target. • The policy should include more detail on improvements to local transport services and linkages. • The policy should require Construction Logistic Plans (CLPs) and Delivery and Servicing Plans to be co-ordinated with travel plans. 	<ul style="list-style-type: none"> • The Council agrees that the policy initiatives and proposals would contribute to reduction in CO2. Such policies and proposals are not considered appropriate for the Strategic policy but will be addressed in the preparation of the Transport Strategy as part of the Local Implementation Plan (LIP). • The Council support public transport as well as improved public transport interchanges in the strategic policy. Detailed policies to support public transport and more cycling would be addressed through the Transport Strategy being

Proposed Policy	Summary of Comments	Council's Response
		<p>prepared as part of the LIP.</p> <ul style="list-style-type: none"> The pre-submission document will take on these comments and further detailed policies related to CLPs and delivery and servicing plans will be included in the LIP.
SP5 Employment	<ul style="list-style-type: none"> The policy should identify how employment land will be protected from change of use, specifically housing. The policy should provide more detail on how it will encourage mixed use development to improve job creation. The policy should include evidence to support local employment needs and make policy Haringey specific. 	<ul style="list-style-type: none"> The employment land hierarchy sets out how employment land will be protected. This will be further detailed in the pre-submission document and the Development Management DPD Flexibility will be shown for alternative uses that complement employment uses, contribute to social infrastructure or provide training. Pre-submission document will make clearer reference to relevant evidence and local context. The pre-submission document will include a separate policy on improving access to jobs and training
SP6 Town Centres	<ul style="list-style-type: none"> The policy should specifically identify the town centres which will be improved. The policy should encourage a more flexible approach to A2 uses in town centres. The policy should be expanded to include the scale of development with specific reference to the most suitable locations in the town centres. 	<ul style="list-style-type: none"> Pre-submission document will detail specific town centres and the town centre hierarchy. The pre-submission document will set out the preferred alternatives to A1 in town centres. The pre-submission document will ensure a range of shops and other appropriate town centre uses.
SP7 Design	<ul style="list-style-type: none"> The policy should make reference to the role of design in flood management, fire risk, and mitigation of the adverse effects of noise More evidence is needed to support the 	<ul style="list-style-type: none"> These issues will be addressed in the pre-submission document and further detailed in the Sustainable Design and Construction SPD, and the DM DPD.

Proposed Policy	Summary of Comments	Council's Response
	<p>development of tall buildings</p> <ul style="list-style-type: none"> The policy should make specific reference to Lifetime Homes, Wheelchair provision, Secured by Design and Code for Sustainable Homes. 	<ul style="list-style-type: none"> The Core Strategy is in line with national guidance on tall buildings. This will be taken on board and reference to these standards will be included in the pre-submission document.
SP8 Conservation	<ul style="list-style-type: none"> The policy should be more detailed and locally distinctive, particularly in regards to strategic views Details of Article 4 Directions should be included in the policy 	<ul style="list-style-type: none"> This will be considered in future SPDs Article 4 Directions will be appropriately referenced in the pre-submission document
SP9 Green Infrastructure	<ul style="list-style-type: none"> The policy should make clearer the definition of green infrastructure The policy should identify areas, actions and measures to be taken to address deficiencies and safeguard open space in the borough There is a need to include another policy to deal with the provision of children's play space 	<ul style="list-style-type: none"> Title of policy to be changed to Open Space and Biodiversity – aspects of green infrastructure will be explained within this amended policy. The policy will be amended to more clearly set out issues relating to open space deficiencies and will also set out indicators to monitor loss and gain of open space. The policy will be amended to address children's play space in greater detail.
SP10 Health and Well-being	<ul style="list-style-type: none"> The policy should include details of how accessibility to health and well-being opportunities will be improved More evidence should be included in the policy to ensure it is Haringey specific. Haringey NHS has suggested a two prong approach to this policy, to address the demands on health infrastructure; and to promote healthier lifestyles and community well-being. 	<ul style="list-style-type: none"> The policy will be amended to ensure clear reference to cross cutting policies which will deliver opportunities for improved access to facilities. The policy will be amended to reflect local services and facilities The policy will be amended to include this two prong approach, including better reference to cross cutting Core Strategy policies and

Proposed Policy	Summary of Comments	Council's Response
SP11 Culture and Leisure	<ul style="list-style-type: none"> • The policy should identify and address areas with sports and leisure deficiencies. • The policy should refer specifically to local facilities, cultural events, uses and needs to ensure local distinctiveness. 	<p>additional strategies.</p> <ul style="list-style-type: none"> • The policy will be amended to include details of provision of sports and leisure facilities. The CIP will identify deficiencies. • The amended policy will refer to specific culture and leisure facilities in the borough.
SP12 Community Infrastructure	<ul style="list-style-type: none"> • The policy should identify the infrastructure needs for the borough in the plan period. • The policy should include targets to allow for monitoring. 	<ul style="list-style-type: none"> • The CIP, produced to support the Core Strategy, will set out the costs, timescales and partners required to deliver the different strategic infrastructure needs of the borough. The CIP refers to specific local infrastructure needs and will also provide information on provision of facilities that can be monitored.

4 Consultation on the Proposed Submission

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

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

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

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

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

4.5 Representations to the Proposed Submission related to the two key criteria required for submission and adoption. These were the legal requirements of the Core Strategy, and the tests of soundness. During Examination the Planning Inspector will only consider comments which refer to these criteria. It is considered the process for the development of the Core Strategy Proposed Submission document has complied with the relevant regulations as well as the Council's adopted Statement of Community Involvement.

4.6 Consultation analysis & changes to the Core Strategy

4.6.1 63 formal representations were received from statutory consultees, resident and community groups and individuals, totalling over 700 separate comments. Our analysis of the formal representations received during the consultation shows that the responses fall into two broad categories: minor amendments and fundamental policy changes:

a) **Minor amendments requiring a clarification of our policy intent, a correction or improved referencing**

A number of minor amendments to the Core Strategy were proposed. It is important to note that these amendments simply clarify the Council's policy intent, correct typographical errors, improve referencing or update supporting evidence. None of these amendments significantly affect the policy direction or soundness of the Core Strategy.

A substantial number of representations were received from community and residents' groups in relation to a number of issues including:

- Conservation and improved referencing to PPS5;
- Sustainability/climate change;
- The location of tall buildings;
- Stronger reference to sequential tests and flooding;
- The provision of social and community infrastructure;
- Improved referencing to new legislation, e.g. draft Replacement London Plan;

As a result of the above we made minor policy changes or changes to the supporting text to reflect the representations received. These minor changes were reported to Cabinet on the 12th October 2010.

b) **Fundamental points that seek a change in policy**

Representations that made fundamental points about our policy direction, soundness or new evidence base which has been issued following consultation led to the need for the Core Strategy to be re-consulted on before being submitted to the Secretary of State, to ensure that the document is sound. Following new evidence, the affordable housing policy and employment land designations were revised and re-consulted on from 4th November until 2nd December 2010.

4.7 Summary of Comments made to Proposed Submission

4.7.1 Below summarises the 700 comments made on the Proposed Submission document.

Introduction – 100 comments

- General support
- Need for extra clarity and consistency on wording, factual information and references.
- Include additional references
- Include a map of the Index of Multiple Deprivation
- Insert the River Lee Navigation into the Core Strategy Vision Statement
- Amend and update maps and boundaries for clarity and consistency
- Area Assembly profiles should be referred to as 'Neighbourhoods'

Haringey's Spatial Strategy – 29 comments

- Amend the text on the Key Diagram to read 'Haringey Heartlands Area of Intensification' and 'Tottenham Hale Area of Opportunity'. Also, de-designate Haringey Heartlands as Strategic Industrial Land on Figure 2.1.
- On key diagram add additional Decentralised Energy Hub to south Northumberland Park.
- Make updates and amendments to text and diagram to ensure consistency.

SP1 Managing Growth – 99 comments

- General support
- Amend text throughout to ensure clarity and consistency and up to date information.
- Include updated housing figures from latest Housing Trajectory.
- Ensure reference is made to flooding and sequential test
- As Tottenham Hale Growth Area is located in an area of the borough at risk of flooding, the sites within the area have all undergone the Sequential Test (and, where necessary, the Exception Test) in accordance with Planning Policy Statement 25 (PPS 25): Development and Flood Risk (see the Sequential Test Report for Tottenham Hale). This has ensured that there are no alternative sites of lower flood risk where the development can be located."
- Additional sentence to be added at end of paragraph: 'Proposals to improve open space, pedestrian and cycle access should complement and link into the Regional Park and existing routes and seek to enhance the extent of green infrastructure within the area.'
- Ensure factual information is correct and consistent
- Ensure consistency and conformity with national and regional policy

SP2 Housing – 40 comments

- General support
- Update relevant information and housing figures
- Ensure consistency and conformity with London Plan policies and targets.

- Need to display more evidence to back up figures and targets in policy
- Ensure consistency of housing figures with CIP

SP3 Gypsies and Travellers – 2 comments

- Amend title to 'Provision of land for Gypsies and Travellers'
- Improve references in text to Site Allocations DPD and London Plan.

SP4 Working towards a Low Carbon Haringey – 39 comments

- Ensure clearer explanation of climate change and the impacts it will have on local environments
- Ensure that the policy recognises that renewable energy technologies and measures will have regard for historic environment objectives
- Ensure cross referencing to relevant strategic policies, the DM DPD, the Sustainable Design and Construction SPD and other relevant strategies.
- Ensure policy refers to the Mayor's energy efficiency hierarchy in line with London Plan policy 4A.1

SP5 Water Management and Flooding – 12 comments

- Supporting text to reflect the strategic approach to flood risk in line with the evidence base of SFRA, Sequential Test, Thames Catchment Flood Management Plan.
- Ensure cross referencing to DM DPD and Sustainable Design and Construction DPD
- Policy should ensure that developments should incorporate measures to protect and improve water quality for surface and groundwaters.
- The text should differentiate between River Lea Navigation and River Lee

SP6 Waste and Recycling– 10 comments

- Amend recycling and waste targets to align with targets in London Plan
- Ensure cross referencing to relevant strategic policies and DM policies
- Ensure policy sets out how it relates to the historic environment
- Ensure closer reference to London Plan waste hierarchy

SP7 Transport – 35 comments

- General support
- Amend some factual and typographical errors
- Policy and supporting text should promote improvement of cycle networks and safety in borough
- Ensure cross reference to Community Infrastructure Plan and North London sub-regional Transport Framework.

SP8 Employment – 50 comments

- Factual and typographical updates and amendments
- Ensure cross referencing to relevant strategic policies, DM policies, and other relevant strategies and plan
- The policy should promote green industries and green practices.

SP9 Improving skills and training to support access to jobs and community cohesion and inclusion – 9 comments

- General support
- Factual and typographical amendments and updates
- Ensure cross referencing to relevant policies and strategies

SP10 Town Centres – 52 comments

- General support
- Improved referencing and signposting to relevant strategic policies, DM policies, and other relevant strategies and plans.
- Amend supporting text to more accurately reflect the borough's context
- The policy should include its intension to ensure respect for local and historic character and promotion of high quality design.

SP11 Design – 44 comments

- General support
- Improved referencing to London Plan, relevant Council plans and other strategies and frameworks
- Clearer evidence relating to tall buildings should be included in policy

SP12 Conservation – 39 comments

- Re-write SP12 to align with PPS5
- Typographical and factual amendments and updates
- Improved referencing and signposting to relevant policies
- Clarity of borough context
- Replace reference to PPS15 with Planning Policy Statement 5 (PPS5) Planning for the Historic Environment (2010)

SP13 Open Space and Biodiversity – 63 comments

- Include reference to private gardens in policy and supporting text
- Include more reference to the importance of Lee Valley Regional Park
- Include more reference to the provision and protection of play spaces.
- Improve referencing to relevant strategic policies, DM policies, SPDs, and other strategies and frameworks.
- Policy should emphasise further the resistance to loss of open space.

SP14 Health and Wellbeing – 27 comments

- General support
- Factual update and amendments
- Improved referencing to relevant strategic policies and the Community infrastructure Plan
- Include reference to the importance of access to and provision of play facilities.

SP15 Culture and Leisure – 28 comments

- General support
- Factual and typographical corrections
- Clarity in cross referencing to Community Infrastructure Plan
- Ensure policy refers to the importance of provision of play facilities

SP16 Community Infrastructure – 20 comments

- Clarity of definition of community facilities
- Ensure policy sets out role of voluntary sector as providers of community facilities
- Ensure policy refers to good access to and maintenance of all community facilities in the borough.

SP17 Delivering and Monitoring the Core Strategy – 12 comments

- Improved referencing to relevant SPGs and DM policies
- Update and amend information relating the Local Development Scheme.
- Provide clear definition of Community Infrastructure Levy as it will apply to Haringey.

4.8 Consultation on Additional Regulation 27 Proposed Submission

4.8.1 Notification of the consultation outlining the purpose and process was sent to those who made representations during the previous stage of consultation in May/June 2010. The consultation details were also posted in local newspapers and on the Council website.

SP2 Housing

4.8.2 The affordable housing element of SP2 Housing within the Proposed Submission Core Strategy stated that schemes of five or more units should provide 50% affordable housing on site. However, the Council's Affordable Housing Viability Study (which was issued after the consultation) recommends that the policy threshold is maintained at ten units. This represented a change in policy direction and it was therefore necessary to re-consult to ensure that the Core Strategy is sound.

4.8.3 The revised threshold of 10 units for affordable housing was supported. SP2 Housing is broadly consistent with the London Plan.

SP8 Employment and Land Designations

4.8.4 SP8 raised general conformity issues in relation to the identification of Strategic Industrial Locations, and the potential for significant retail development outside of town centres. Representations considered the Core Strategy to not be in general conformity with the London Plan for reasons relating to the proposed employment land designations.

4.8.5 In total, 50 individual responses were received to the document from a total of 10 organisations. The Greater London Authority (GLA) submitted the most comments – a total of 17. Of all the comments received, the GLA's submission required some further consideration before the Core Strategy can be submitted to the Secretary of State for independent examination. Details of these representations can be found in the Schedule of Focused Changes. The Council has been involved with ongoing dialogue with consultees to resolve issues which were raised during this consultation. Once submitted it will be a matter for the Inspector conducting the Examination in Public to consider our changes, both fundamental and minor.

4.9 Revised Consultation on the Fundamental Changes to the Core Strategy (Revised Additional Regulation 27)

4.9.1 The Core Strategy Examination in Public (EiP) commenced in June 2011 with six days of hearings from 28th June 2011 to 8th July 2011. Following discussions during the EiP and to ensure soundness of the Core Strategy, the Council decided to undertake a revised six week borough wide consultation on the fundamental changes made to the Core Strategy (Core Document CSSD-03) and the Substantiality Appraisal.

4.9.2 These changes were initially consulted on for four weeks and to a limited number of consultees in November – December 2010. The consultation document related to changes made to SP2 Housing and SP8 Employment. Comments made to the previous consultation were carried forward and did not need to be repeated in the revised consultation.

4.9.3 In addition, the Inspector suggested that the Council provided an opportunity for consultees to comment on the draft National Planning Policy Framework, which was issued in July 2011, in terms of what implications it may have, if any, for the submitted Core Strategy.

4.9.4 The revised consultation took place from 22nd September – 3rd November 2011. This was a borough wide consultation.

4.9.5 The consultation period was advertised through:

- Emails and letters to all consultees on our database, with details of the consultation, information on how to get involved and how to respond;
- Public Notices in Haringey newspapers; Tottenham and Hornsey Journals 22/09/11; Haringey Independent 23/09/11;
- Public Notices in neighbouring borough newspapers; Enfield Independent and the Times for Barnet, both 23/09/11; and
- Information on Haringey web site.

4.9.6 The relevant documents were made available to view at:

- River Park House, 225 High Road Wood Green, N22 8HQ;
- Civic Centre, Wood Green N22 8LE;
- All local libraries; and
- On Haringey website www.haringey.gov.uk/corestrategy

4.9.7 In the run up to the revised consultation a total of 581 emails and letters were received with requests to be notified about the consultation. These new contacts were added to the consultation database and notification was sent to them along with all other existing consultees.

4.9.8 In total 384 representations were made, 60 of which were unduly made. One representation was received from a local community group with approximately 900 signatures attached. An overwhelming amount of interest was expressed in the revised consultation with the large majority of

comments objecting to changes to the designation of the DEA 6 - Friern Barnet former sewage works from Employment Land (EL) to Locally Significant Industrial Site (LSIS). Responses were also received from the GLA, who supported the changes, Savills, representing Tottenham Hotspur F.C., a number of community groups and individuals.

4.9.9 The unduly made representations related to issues which did not refer to the policies in the consultation document. In a number of cases these related specifically to the planning application for the Pinkham Way site, received from the North London Waste Authority and Barnet Council. These comments were forwarded to the Pinkham Way planning application team. A response was sent to those who submitted unduly made comments explaining the difference between this consultation and the planning application.

4.9.10 From the 324 duly made representations there were a total of 1484 individual comments. These comments were logged, summarised, and the Council provided a response to each individual comment, which can be viewed on the Council's website www.haringey.gov.uk/core_strategy_examination.

4.9.11 The summary of comments and the Council's response, along with copies of all original submissions were forwarded to the Inspector on the 15th December 2011. On assessing the outcomes of the consultation the Inspector set a date for an additional hearing for the 22nd February 2012. The hearing is an opportunity to discuss the issues raised during the revised consultation and forms part of the ongoing Examination,

4.9.12 Those who made representations to this consultation were notified about the details of the hearing, and where appropriate, invited to attend and participate. A Public Notice was placed in the Haringey Independent on 13th January 2012 and the Core Strategy web pages (www.haringey.gov.uk/core_strategy_examination) were updated to give information on the date, time, and location of the hearing, in line with Regulation 34(2).

4.9.13 The Council is of the view that the consultation exercise undertaken fully accords with and/or exceeds the statutory requirements and the SCI and is entirely proportionate to the policy amendment proposed.

4.9.14 All letters of notification, Public Notices, consultation documents, consultee representations, Council responses and other relevant documentation are available to view on request.

4.10 Conclusion

4.10.1 It is considered that consultation on the Core Strategy from Issues and Options to Submission and Examination stages was carried out in line with Regulations 25 and 27 of the Planning and Compulsory Purchase Act 2004, and in line with principles set out in the Council's adopted Statement of Community Involvement.

4.10.2 All notes and reports mentioned in the above statement are available to view on request from the LDF team 02084894179 or ldf@haringey.gov.uk