

# Development Management DPD

**Pre-Submission Version**

January 2016





London Borough of Haringey  
River Park House  
225 High Road  
Wood Green  
N22 8HQ

[www.haringey.gov.uk](http://www.haringey.gov.uk)

Cartography & desktop publishing by:



[www.urban-graphics.co.uk](http://www.urban-graphics.co.uk)

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## HOW TO RESPOND TO THE CONSULTATION?

The Council will consult on the pre- submission of the Development Management Policies from **8<sup>th</sup> January to the 4<sup>th</sup> March 2016**. At this stage of the Plan's preparation the consultation is primarily concerned with the 'soundness' of the document.

A sound Plan must be:

**Positively prepared** – it must be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements;

**Justified** – it should be based on robust evidence and should be the most appropriate strategy when considered against reasonable alternatives;

**Effective** – it should be deliverable over the plan period and be based on effective joint working; and

**Consistent with national planning policy** – it has to have regard to, and give effect to, the policies contained within the National Planning Policy Framework as well as extant national planning policy statements and guidance.

Further guidance on this criteria, how to make your comments and the type of information required is provided in Appendix G 'Making a Representation'.

In particular, if you wish to make a representation seeking a change to the Plan you should:

- Be clear about which policy or paragraph, figure or part of the plan your representation relates to;
- State clearly why you consider the Plan is not sound having regard to the above tests;
- Provide supporting information or evidence to justify why the Plan should be changed; and
- Put forward the changes that you consider necessary to make the Plan sound.

The Plan and all supporting documents can be found at:

[www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework-ldf/development-management-dpd](http://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework-ldf/development-management-dpd)

Hard copies are also available for inspection at the following locations:

- Planning Department  
Level 6 River Park House  
225 High Road  
Wood Green  
N22 8HQ
- Civic Centre  
High Road  
Wood Green  
N22 8LE
- All public libraries

You can submit your comments:

- By email to [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)
- In writing to Planning Policy Team  
Level 6, River Park House  
225 High Road Wood Green  
London N22 8HQ.

All comments should be submitted by **4<sup>th</sup> March 2016**.

# Introduction

CHAPTER

**01**

# Introduction

# 01

**1.1** The Strategic Policies Local Plan sets out Haringey's spatial strategy for managing development and growth in the Borough up to 2026. The strategy provides a positive framework for ensuring that housing, employment, infrastructure and other needs are met in a way that contributes to the delivery of sustainable development, both in the Borough and Greater London. The Strategic Policies Local Plan is guided by a number of key objectives which are set across five overarching themes, as follows:

- People at the heart of change;
- An environmentally sustainable future;
- Economic vitality and prosperity shared by all;
- Safer for all; and
- Healthier people with a better quality of life.

**1.2** The Development Management Development Plan Document (DPD) gives effect to Haringey's spatial strategy and the key objectives of the Strategic Policies Local Plan by supporting proposals that contribute to the delivery of sustainable development in accordance with the strategy, and providing a clear framework for resisting development that would be at odds with the Local Plan.

**1.3** The Development Management DPD sets out criteria based policies against which planning applications will be assessed, including policies which give effect to the designations shown on the adopted Policies Map. The Development Management policies will be considered alongside the full suite of Haringey's Local Plan policies, discussed in further detail below.

## Development Management DPD and other planning policy documents

**1.4** Figure 1.1 shows where the Development Management DPD sits within the hierarchy of national, regional and local planning policy documents.

## National and regional planning context

**1.5** Development in Haringey is currently guided by national and regional policies including National Planning Policy Framework (NPPF) (2012) and London Plan (2015). The NPPF sets out Government policy on planning matters in England and Wales. Where local planning authorities prepare Development Plan Documents these are required to be consistent with the NPPF.

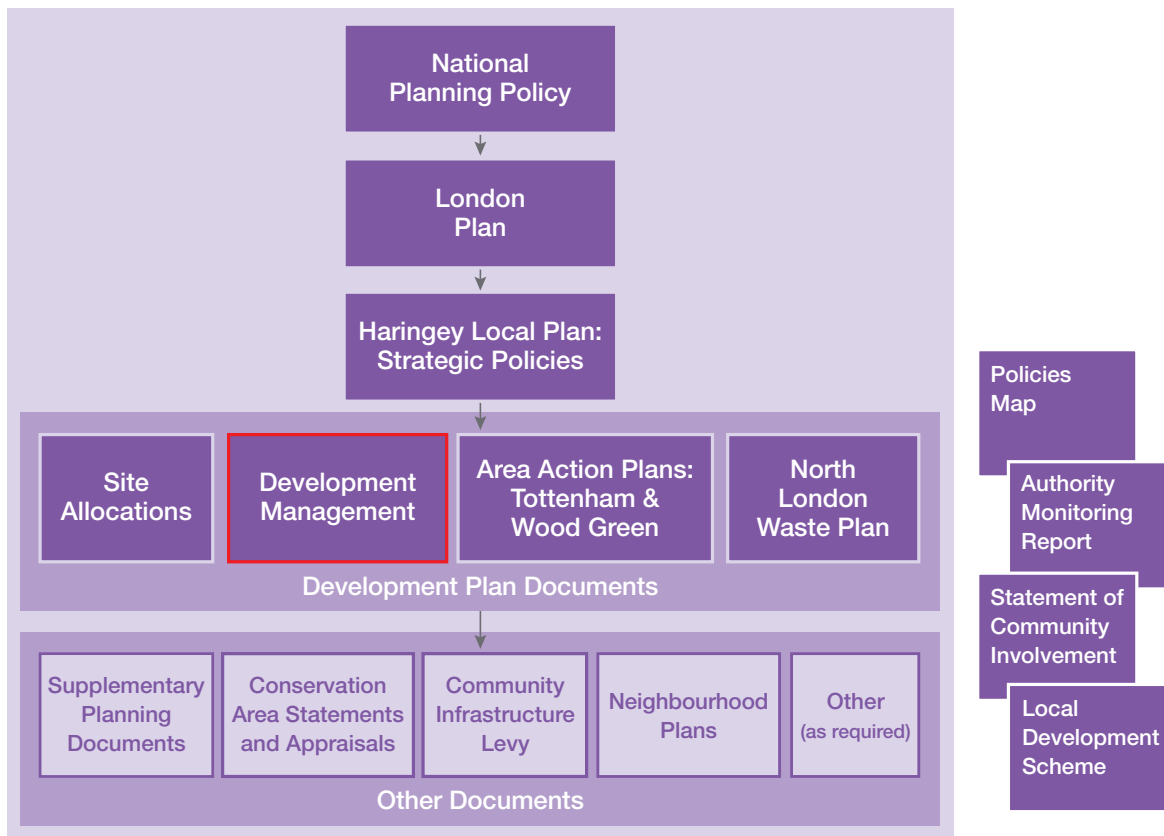
**1.6** The London Plan sets out a regional spatial development strategy and includes policies to guide development on strategic matters in all London boroughs. This includes policies on housing, employment, town centre management, open space, transport and climate change adaptation and mitigation. Haringey's Local Plan documents must be in general conformity with the London Plan.

## Relationship to other Local Plan documents

**1.7** Haringey's Local Plan is made up of a number of individual planning policy documents. These are currently adopted or in development. In addition to this Development Management DPD the Local Plan documents include:

- Strategic Policies Local Plan – sets out the Council's spatial strategy and key policies for the future development of the Borough through to 2026. The Council is currently proposing amendments to this document to reflect changes in overarching national and regional policy;
- Site Allocations DPD – sets out the specific strategic sites within the Borough (excluding the Tottenham area) which are considered appropriate to accommodate housing and employment growth;
- Tottenham Area Action Plan – identifies strategic site allocations for housing and employment growth in Tottenham and area wide policies;
- Wood Green Area Action Plan – will identify strategic site allocations and area wide policies for managing growth in Wood Green;
- Joint North London Waste Plan – identifies sites and areas with sufficient capacity to manage the different wastes generated in North London and includes policies against which to consider proposals for new waste facilities; and
- Policies Map – illustrates the geographical extent of the policies and proposals identified in the development plan documents.





**Plan development**

- 1.8 The Development Management DPD has been developed over several stages and in consultation with local residents and other stakeholders. It will be subject to public examination prior to its adoption. The process from inception to adoption is broadly outlined below.
- 1.9 Stage One – The initial issues and options public consultation in March 2013 offered the public (including residents, landowners, community groups, other London boroughs, the London Mayor and statutory consultation bodies) the opportunity to comment on the proposed scope of the Development Management document. The scope was reflected in options for 23 topic themed policy areas. Responses received were considered and used to inform a ‘Preferred Option’ Development Management document.
- 1.10 Stage Two – Informed by the initial scoping consultation, the Council prepared and consulted on a ‘Preferred Option’ Development Management document from February to March 2015. The preferred option stage of consultation is not a statutory requirement in the Local Plan preparation process. However, the Council proceeded with publishing the Preferred Option document to ensure robust and comprehensive engagement with the local community and other stakeholders, seeking views on the emerging direction of travel of detailed policies.

- 1.11 Stage Three – This consultation is on the Council’s ‘Pre-Submission’ plan, which took into account feedback received to the preferred options consultation. This consultation will give stakeholders and partners a final opportunity to comment on the Plan, with any unresolved matters being referred to the Government appointed Planning Inspector to consider at the independent examination. Further details on this process are set out in Appendix G.
- 1.12 Stage Four – Haringey Council will submit the Development Management document to the Secretary of State for examination by an Independent Planning Inspector. The Examination in Public will provide an opportunity for the public to make a case for further amendments.
- 1.13 Stage Five – Documents which are found to be sound by the Inspector will be adopted by resolution of the Council. This is expected in late 2016.

## Integrated impact assessment

- 1.14** An integrated impact assessment has been carried out as part of the Local Plan production process. This assessment uses a single process to address requirements of different types of impact assessments which together help to inform policy development. The integrated impact assessment addresses relevant requirements and guidance for Sustainability Appraisal, Strategic Environmental Assessment, Habitats Regulations Assessment, Equalities Impact Assessment and Health Impact Assessment.
- 1.15** It is a requirement that a Sustainability Appraisal (SA) is undertaken in line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which transposes into national law the European Union's Strategic Environmental Assessment Directive. SA is an iterative process which occurs throughout the plan production stages. Findings of the SA for the Development Management DPD will be published alongside the Plan.
- 1.16** An Equalities Impact Assessment considers the impact of policies on certain groups, to identify and combat discrimination and serve the needs of disadvantaged groups in the community. This meets the requirements of the Race Relations Act 2000, the Disability Discrimination Act 2005 and the Equality Act 2006.
- 1.17** The Habitats Regulations Assessment (HRA) considers the impact of the Plan's proposals on significantly important habitats protects under European directives.

## Superseded policy documents

- 1.18** The policies contained in this Development Management DPD will supersede and/or replace Haringey's Unitary Development Plan Saved Policies (March 2013). A schedule of the policies this Plan will replace is provided in Appendix D of this document.
- 1.19** A schedule is provided in Appendix E of this document outlining the Supplementary Planning Guidance (SPG) and Supplementary Planning Documents (SPD) which will be superseded and/or replaced by the policies in this Plan.

## Structure of this document

- 1.20** The planning policies in this document have been divided into six chapters each focussing on a thematic policy area.
- Chapter 2 Design and Character
  - Chapter 3 Housing
  - Chapter 4 Environmental Sustainability
  - Chapter 5 Transport and Parking
  - Chapter 6 Employment and Town Centres
  - Chapter 7 Community Infrastructure, Implementation and Monitoring
- 1.21** Cutting across all thematic policies is the presumption in favour of sustainable development contained within the National Planning Policy Framework, which is also reflected in Policy SP0 of the Strategic Policies Local Plan. This requires that:
- a When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the NPPF. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.
  - b Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.
  - c Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise - taking into account whether any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the NPPF taken as a whole; or specific policies in that Framework indicate that development should be restricted.
- 1.22** It is intended that the policies contained within this document are to be applied borough-wide unless specified otherwise in an Area Action Plan. Neighbourhood plans should also be in general conformity with the policies of this Plan.

# Design & Character

CHAPTER

02

- 2.1** The Council is committed to delivering excellence in development quality. It expects all new development to embrace the principles of sustainable design, positively respond to the character and setting of Haringey's neighbourhoods, as well as avoid harmful impacts, especially to the amenity of neighbouring buildings, local character and heritage assets. The Council considers that new development should enhance the quality of life of those living and working in the Borough, as well as those visiting it.
- 2.2** Delivering change whilst safeguarding the best, and improving the rest, of the Borough's distinctive places requires a clear understanding of urban character, structure and form. The Council has produced an Urban Character Study (UCS) (2015) and a Tall Buildings Locations Validation Study (2015) to both inform and support the Local Plan. These studies set a context for positively managing development and change over the plan period.
- 2.3** The policies in the following chapter take a lead from the Strategic Policies Local Plan, including Policies SP1, SP11 and SP12, setting further detailed requirements across key topic areas. They promote high quality design whilst seeking to optimise the use of land in order to achieve economic and housing growth across the Borough. The Council aims to deliver sustainable development through securing high quality development.
- 2.4** To assist in delivering high quality development the Council has established a Quality Review Panel (QRP) which brings together a team of independent professionals from a range of backgrounds to scrutinise major and controversial development proposals. The QRP advises applicants, Council officers and the Planning Committee on their consideration of how well a development scheme is meeting the principles of the Haringey Development Charter (see Policy DM1). In addition to the QRP, the Council may also take advice from regional independent bodies such as London Advisory Committee at Historic England.

## POLICY DM1: DELIVERING HIGH QUALITY DESIGN

### Haringey Development Charter

- A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area. The Council will support design-led development proposals which meet the following criteria:
- a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
  - b Make a positive contribution to a place, improving the character and quality of an area;
  - c Confidently address feedback from local consultation;
  - d Demonstrate how the quality of the development will be secured when it is built; and
  - e Are inclusive and incorporate sustainable design and construction principles.

### Design Standards

#### Character of development

- B Development proposals should relate positively to their locality, having regard to:
- a Building heights;
  - b Form, scale & massing prevailing around the site;
  - c Urban grain, and the framework of routes and spaces connecting locally and more widely;
  - d Maintaining a sense of enclosure and, where appropriate, following existing building lines;
  - e Rhythm of any neighbouring or local regular plot and building widths;
  - f Active, lively frontages to the public realm; and
  - g Distinctive local architectural styles, detailing and materials.

## Landscaping

- C Development proposals shall demonstrate how the landscaping and planting are integrated into the development as a whole. The Council will expect development proposals to respond to:
- Landform;
  - Levels, slopes and the fall of the ground;
  - Trees on and close to the site;
  - Landscaped boundary and treatments; and
  - Any other significant biodiversity (including prioritising native over invasive species) on or close to the site.

## Privacy and amenity

- D Development proposals must ensure a high standard of privacy and amenity for the development's users and neighbours. The Council will support proposals that:
- Provide appropriate sunlight, daylight and open aspects (including private amenity space where required) to all parts of the development and adjacent buildings and land;
  - Provide an appropriate amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development; and
  - Address issues of vibration, noise, fumes, odour, light pollution and microclimatic conditions likely to arise from the use and activities of the development.

- 2.5 The 'Haringey Development Charter' reinforces the Council's commitment to design excellence and aims to promote high quality and sustainable development. It represents the core set of questions the Council poses to applicants of all new development or changes of use to demonstrate their detailed understanding and appreciation of the site's context and to robustly justify their design rationale. It also engages with best practice which recommends the views of affected parties should be sought and taken into account in developing proposals, and recognises that design quality can be compromised through poor construction and the use of cheaper materials.

- 2.6 All development requiring a Design and Access Statement should explain the purpose of the development, demonstrating how the proposal addresses the five principles of the Development Charter set out in Policy DM1, supported by clear drawings and images as appropriate.
- 2.7 The policies on design standards recognise that design includes both aesthetics and functionality. The massing, bulk, scale, and height of buildings, and the spaces between them, both public and private, are significant components of an area's character. The consideration of these components and how a proposed development will relate to existing buildings, including any impacts on neighbouring occupiers, will ensure development is responsive to its local context. Securing high quality architecture, materials, and environments will ensure that new developments enhance and enrich the Borough's built environment and the experience of those who use it.
- 2.8 Landscaping should be included as an integral part of the overall design of a development proposal. The landscape and buildings need to be considered together from the start of the design process and careful consideration should be given to the existing character of the site including its typology, existing trees and other natural features. The space around buildings is important not only as a setting for the building in its context, but also for reasons of functionality. It enables the implementation and successful growth of landscaping schemes, provides an outdoor amenity for occupiers, space for refuse storage and car parking, and the sustainable management of flood risk and surface water drainage.
- 2.9 The Council recognises that amenity can be compromised in a number of ways through development such as detrimental loss of daylight and sunlight to existing and adjacent occupiers; loss of privacy and outlook due to the proximity and design of developments; harmful noise, odour, vibration and air pollution from existing and proposed developments (typically commercial activities and other activities such as rail); developments with the potential to endanger highway safety; and cause detrimental micro-climate effects. Buildings should therefore be compatible with their local environment and conditions.
- 2.10 The design and layout of buildings must enable sufficient sunlight and daylight to penetrate into and between buildings, and ensure that adjoining land or properties are protected from unacceptable overshadowing. The Building Research Establishment (BRE) provides guidance on site layout planning to achieve good sun-lighting and day-lighting (BRE Site Layout Planning for Daylight and Sunlight: a guide to good practice).

## POLICY DM2: ACCESSIBLE AND SAFE ENVIRONMENTS

- A Proposals should ensure that new developments:
- Can be used safely, easily and with dignity by all;
  - Are designed so that the layout improves people's access to social and community infrastructure, including local shops and public transport;
  - Protect, improve and create, where appropriate, safe and accessible pedestrian and cycling routes and should not impede pedestrian and cycling permeability; and
  - Comply with the principles set out in 'Secured by design'.

- 2.11** A healthy and accessible environment follows the principles set out in the London Plan. It extends from individual homes to town centres, natural environments and infrastructure.
- 2.12** A high quality, inclusive and accessible environment benefits the quality of life for residents and visitors. It allows everyone to move around easily and enables residents at all stages of life to remain within the local area as part of the community, including families with small children, older people living by themselves and those with mobility impairment. Properly implemented, accessible and inclusive neighbourhoods enable people to remain independent and economically active for longer, reducing the need for extensive adaptations to buildings, to meet the needs of existing and potential future users.
- 2.13** Improvements to the public realm must achieve an inclusive, legible pedestrian and cycling environment. Existing pedestrian and cycle routes should be strengthened where opportunities exist.
- 2.14** The design and layout of proposals can help reduce crime through encouraging increased activity, passive surveillance, ease of access, and creating a sense of ownership.

## POLICY DM3: PUBLIC REALM

### Public Art

- A Major development proposals should consider how schemes can enhance local distinctiveness and legibility through the use of public art. Where public art is provided it should be:
- Agreed by the Council;
  - Appropriately located in a prominent location, with consideration given to fixing art to the proposed building or situated on a public space within the site; and
  - Maintained in perpetuity.

### Privately owned public spaces within new development

- B New privately owned public spaces should promote secure, accessible and inclusive environments that positively relate to local context and incorporate high quality design and public realm features. The management of these spaces, including their use and public access, will need to be agreed by the Council.

### Advertisements

- C Proposals for all advertisements should be designed to a high standard and, in particular, should:
- Contribute to a safe and attractive environment;
  - Be of a high quality and sensitive to its visual appearance on the building on which it is to be sited and the surrounding street scene, especially in the case of listed buildings and conservation areas;
  - Avoid unsightly proliferation or clutter of signage in the vicinity;
  - Not cause a hazard to pedestrians or road users, including by siting and design;
  - Be sited to avoid visual intrusion of light pollution into adjoining residential properties; and
  - Where appropriate, be constructed of materials and finishes which discourage both graffiti and fly posting.

### Telecommunications equipment

- D Proposals for the installation of telecommunications equipment will be permitted where:

- a It is demonstrated the equipment is limited to the minimum operational requirement, which should include any future-proofing requirements to accommodate anticipated improvements in infrastructure;
  - b Opportunities for sharing facilities, such as masts, cabinet boxes and satellite dishes, and erecting antennae on existing buildings or other structures has been fully explored and taken advantage of;
  - c There is no significant adverse impact on the visual amenity of neighbouring occupiers;
  - d There is no adverse effect on the external appearance of the building, street scene, or spaces in which they are located;
  - e The size of any equipment visible from the street is minimised (including satellite dishes, other domestic equipment and any supporting structures);
  - f They are located discretely and do not detract from the special character and appearance of heritage assets or conservation area (see Policy DM9);
  - g They are appropriately designed, coloured and landscaped. For dishes, this may include installing a mesh or transparent structure;
  - h A minimum residual footway width on main pedestrian roads is preserved, in line with the Manual for Streets.
- E** All telecommunications equipment should be removed as soon as reasonably practicable after it is no longer required.

**2.15** Public realm and street design are integral parts of the Borough's environment and character. A poorly designed public realm can lead to street clutter and negatively impact on the accessibility and attractiveness of an area. The design of streets including street lighting, paving, street furniture, public art installations and signage should be of the highest quality and contribute to local distinctiveness, providing safer and accessible spaces for all in line with London Plan Policy 7.5.

**2.16** The Haringey Streetscape Guide (this is under preparation) outlines clear principles that will be expected to be upheld when designing or redesigning the streetscape, as well as the minimum standards acceptable in terms of workmanship and materials. It also includes specific guidance to show how these principles and minimum standards can be met. Transport for London's (TfL) Streetscape Guidance (2009) provides guidance for use on TfL roads.



Public Realm

**2.17** Public art can play a valuable role in contributing to local distinctiveness and legibility of neighbourhoods. Where appropriate, the Council will seek to harness opportunities for development to contribute to public art. The selecting of public art should balance expert and artistic taste with local public opinion. Competitions could be used to select public art commissions. Proposals for public art should outline the arrangements for maintenance and agree these with the Council.

**2.18** The Council will seek to ensure that new development contributes to the delivery of a high quality public realm. Irrespective of whether land is in public or private ownership, development must be accessible and safe, as well as maintained and managed in an appropriate way. This is particularly important to promote inclusive environments.

**2.19** Private ownership and management of the public realm is not in itself a cause of exclusion and segregation, and inappropriate controls and the application of codes of conduct are what the Council wants to avoid. Understanding there may be reasonable concerns around liability and health and safety, through planning obligations, the Council wants to work with developers to ensure standards of public access and use are maintained, including the arrangements for events/pop-up markets, both of which can affect the character of the areas, impact the amenity of neighbouring properties and compete with existing local amenities.

## Advertisements

**2.20** The Council aims to ensure that advertisements are designed to a high standard and contribute to a safe and attractive environment. It considers that poorly designed, very bright or inappropriately sited advertisements can detract from the visual quality of the street or local area.

**2.21** Any proposals for advertisements in or adjacent to the Transport for London Road Network will require a view from Transport for London with reference to the impact of the advert on the safe operation of the highway network.

**2.22** Advertisement and hoardings applications are required to follow the Town and Country Planning (Control of Advertisements)(England) Regulations 2007.

## Telecommunications

- 2.23** The Council recognises the important role that telecommunications have in supporting sustainable communities, particularly in terms of economic development. It will therefore seek to facilitate the delivery of this strategic infrastructure across the Borough. Further details in this respect are set out Policy DM54.
- 2.24** Whilst the Council is broadly supportive of telecommunications development it considers that controls are necessary to ensure that such apparatus and associated structures do not adversely impact on local character, amenity and the environment.
- 2.25** On streets and within public spaces, a proliferation of cabinets can lead to cluttering and run counter to initiatives to de-clutter such environments. Satellite dishes and other telecommunications equipment and associated structures on the front of buildings can harm the character and appearance of an area. Where planning permission is required for telecommunications equipment, the Council will aim to minimise any adverse impact of such development on visual and aural amenity, as well as on public safety, without restricting its provision. All applications for development are encouraged to consider, along with all relevant telecommunications operators, how the telecommunications needs of the occupiers will be met.
- 2.26** Whilst recognising there may be potential for the siting of telecommunications apparatus and associated structures in conservation areas, as well as on or around statutory and locally listed buildings, the Council will ensure that the character and quality of heritage assets and their settings are preserved in line with Policy DM9.
- 2.27** It is considered appropriate that any redundant infrastructure should be removed in an expedient manner. This will alleviate the risk of redundant infrastructure unnecessarily cluttering the streetscape and townscape.
- 2.28** In town centres and heavily trafficked areas, the minimum residual distance of 1.5 metres may not be sufficient to enable appropriate pedestrian flow, and the minimum width will be determined based on the number of pedestrians per square metre and pedestrian flows per minute.

## POLICY DM4: PROVISION AND DESIGN OF WASTE MANAGEMENT FACILITIES

- A All proposals should consider how to sustainably manage waste arising from the development during the design, construction and occupation phases of new developments.
- B All proposals will be required to make on-site provision for general waste, the separation of recyclable materials and organic material for composting. The on-site provision must:
- a Ensure adequate dedicated internal and external storage space to manage the volume of waste arising from the site;
  - b Provide accessible and safe access to on-site storage facilities, both for occupiers and collection operatives, including vehicles, having regard to the Council's Refuse Collection Strategy;
  - c Be located and screened to avoid nuisance and adverse impact on visual and other amenity to occupiers and neighbouring uses, and are within the maximum permitted carrying and reversing distances; and
  - d For mixed-use development, suitably separate household and commercial waste.
- C In addition, proposals for new multi-storey flatted residential development will be required to make provision for:
- a Adequate temporary storage space within each flat, allowing for separate storage of recyclable materials;
  - b Adequate communal storage for waste, including separate storage for recyclables, pending its collection; and
  - c Storage and collection systems at each floor (such as dedicated rooms, storage areas and chutes or underground waste collection systems) which are sensitively integrated into the development, with the Council giving preference to basement servicing over the use of forecourts or ground floor internal storage.



- 2.29** In line with London Plan Policy 5.16, the Council is committed to reducing waste and facilitating a step change in the way in which waste is managed. Following the principles of the waste hierarchy the Local Plan seeks to encourage the re-use, recycling and composting of waste material as a priority over disposal. This policy sets out requirements for new development to help deliver the objectives of the London Plan and Policy SP6.
- 2.30** All proposals will be expected to consider how waste can be reduced and managed from the design all the way through to the construction and occupation phases. Further details on sustainable waste management for all stages of the development process are set out in the Haringey's Sustainable Design and Construction Guidance SPD.
- 2.31** Haringey's Authority Monitoring Report (AMR) indicates that recycling rates are steadily improving in the Borough. The Council will continue to encourage recycling, including through the provision of segregation of waste at source. However, the number of bins required can be unsightly, especially in conversions, and the storage of wastes can cause nuisance in terms of noise and odour. It is therefore important that facilities are well designed and sensitively integrated into developments in accordance with Policy DM1.
- 2.32** The management of waste in flatted properties poses particular challenges which need to be factored into the design of a building at a very early stage. This policy includes additional requirements in this regard, with the intention of ensuring that occupiers in flatted development are provided with suitable and convenient access to recycling and other waste management facilities, and that waste collection services are not compromised by poorly designed buildings. Where flatted development includes basement parking provision, the Council expects the options for basement servicing of waste management and collection to have been fully investigated. This avoids compromising the quality and provision of amenity space, forecourts or active ground floor frontages.

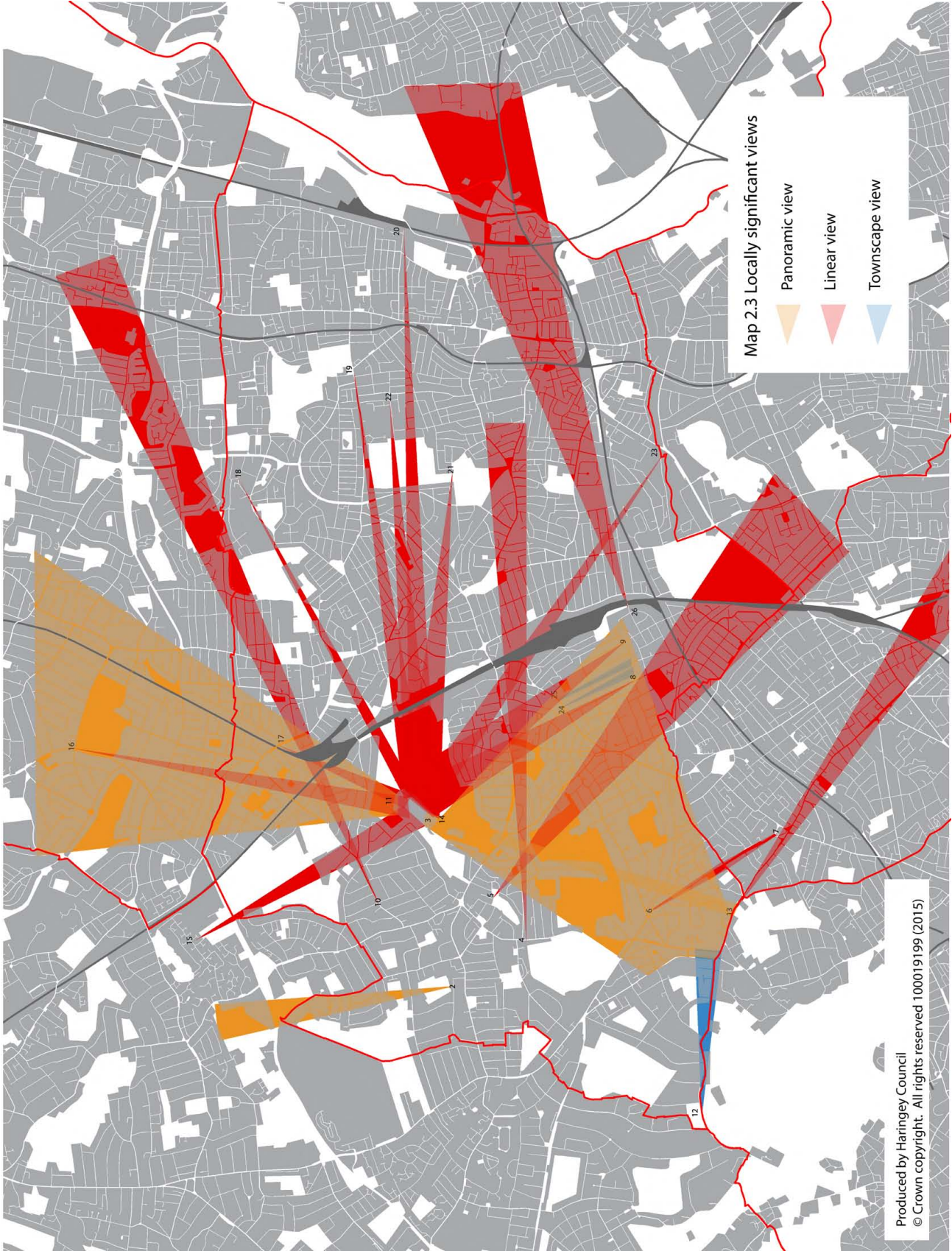
## POLICY DM5: LOCALLY SIGNIFICANT VIEWS AND VISTAS

- A** Development proposals within the viewing corridors of the Locally Significant Views shown on Figure 2.1 must demonstrate how the proposal:
- a Enhances the viewers' ability to recognise and appreciate the landmark being viewed;
  - b Makes a positive contribution to the composition of the local view; and
  - c Meets the requirements of the Council's Tall Buildings and Views Supplementary Planning Document.
- B** Obstructions to the Locally Significant Views should be minimised and will be assessed by the Council on their level impact on the views.
- C** Development proposals should consider opportunities to create new local views and vistas through the design and layout of new development.
- D** Existing identified viewpoints and viewing points should remain publically accessible.

- 2.33** London's Strategic Views are defined in and protected by the London Plan, including Policies 7.11 and 7.12. The London Plan identifies one designated Strategic View with effect on Haringey, no. 1 from Alexandra Palace, in the borough of Haringey, to Central London. Haringey's Local Plan Strategic Policy SP12 sets out how the Council will protect the Strategic View Corridor where it passes through the borough.
- 2.34** A Schedule (Appendix A) and Figure 2.1 set out the proposed Locally Significant Views to be protected which are identified in the Urban Characterisation Study, where further details can be found.



Views and Housing





Building Height

- 2.35** There are also a number of views included in the Council's Conservation Area Management Plans that proposals should have regard to in order to positively respond to local character.
- 2.36** Views have been evaluated according to their interest as panoramas, vistas, landmarks, townscapes or special historic interest. The Mayor of London's criteria in the London Plan and View Management Framework SPG are categorised as London Panoramas, Linear Views, River Prospects and Townscape Views but does not distinguish whether or not a Landmark is visible and indeed the main prospect of the view (as it often is). The Council has therefore adopted this list but further added where a Landmark (or more than one) forms a component of that view. It is those views that contain a Landmark that will have both a core and wider setting cone to the view corridor.
- 2.37** Viewpoints are a valuable amenity for residents and visitors alike and should be maintained and managed. Where possible they should also be enhanced through opportunities to open up new local views on redeveloping sites.
- 2.38** The Council will prepare further guidance on views in Haringey through a Tall Buildings and Views Supplementary Planning Document (SPD).

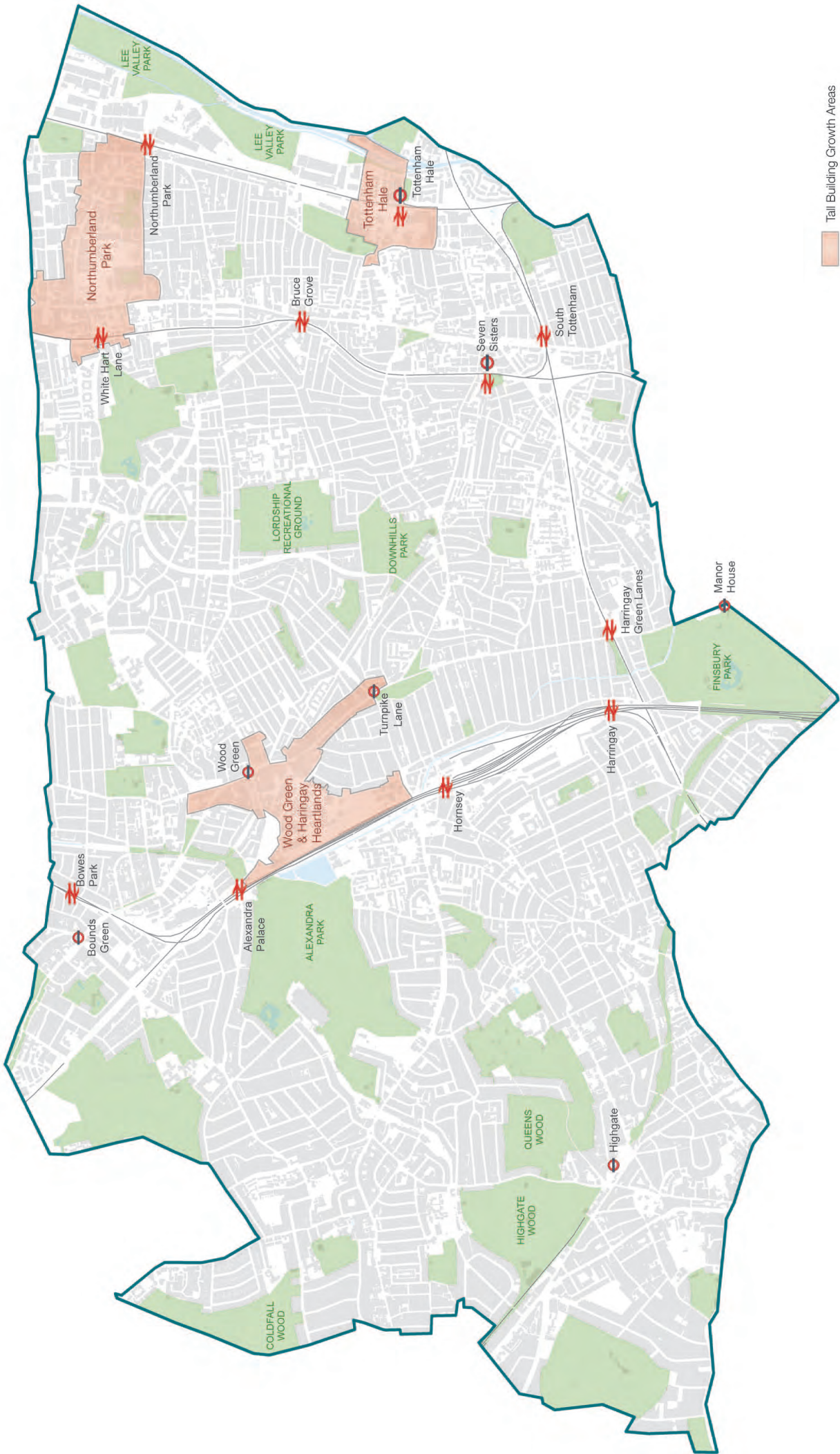
## POLICY DM6: BUILDING HEIGHTS

- A. For all development proposals, the Council expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1.

- B. Proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in community benefit as well as urban design terms and should conform to the following general design requirements:
  - a Be of a high standard of architectural quality and design, including a high quality urban realm;
  - b Protect and preserve existing locally important and London wide strategic views in accordance with Policy DM5; and
  - c Conserve and enhance the significance of heritage assets, their setting, and the wider historic environment that would be sensitive to taller buildings (see Policy DM9).
- C Tall buildings will only be acceptable in areas identified on Figure 2.2 as being suitable for tall buildings. In addition to the requirements in (B) above, proposals for tall buildings should also:
  - a Represent a landmark building which by its distinctiveness must:
    - i Be a way finder or marker, drawing attention to locations of civic importance, major public transport interchanges, and areas of high visitation;
    - ii Be elegant and well proportioned, and visually interesting when viewed from any distance or direction; and
    - iii Positively engage with the street environment.
  - b Consider the impact on ecology and microclimate; and
  - c Be consistent with the Council's Tall Buildings and Views Supplementary Planning Document.
- D Tall buildings within close proximity to each other should:
  - a Avoid a canyon effect;
  - b Consider the cumulative climatic impact of the buildings;
  - c Avoid coalescence between individual buildings; and
  - d Demonstrate how they collectively contribute to the delivery of the vision and strategic objectives for the area.
- E All proposals for taller or tall buildings must be accompanied by an urban design analysis which assesses the proposal in relation to the surrounding context. This should include the submission of a digital 3D model to assist in the understanding of the design concept and impacts of the development.

FIGURE 2.2

Potential Locations Appropriate for Tall Buildings (DM6)



- 2.39** This policy will deliver the Council's objectives for 'Tall' and 'Taller' buildings alongside the Strategic Policies Local Plan. Taller buildings are defined as those that are two to three storeys higher than the prevailing surrounding building heights. Tall buildings are defined in the Strategic Policies Local Plan as being buildings 10 storeys and over. Taller buildings are not Tall buildings.
- 2.40** Tall and Taller buildings can be prominent and visual features which affect everyone. They can be places to live and work and their presence can create a sense of place and give an impression, whether good or bad. They can also help mark the location of town centres and major transport nodes, close vistas of long straight roads and define landscape features. Provision for Taller buildings, in particular, is significantly important to the delivery of the Borough's spatial strategy that focuses growth and development needs to specific growth areas. Where they are well designed, of high architectural quality and located in the right places, such developments can enhance and contribute to the attractiveness of an area.
- 2.41** However, poorly designed Tall or Taller buildings in the wrong locations can cause intrusive effects on both the immediate and the wider area by adversely impacting local views, domineering heritage assets and their settings, townscapes and other important landmarks, and by altering the established skyline.
- 2.42** The Council's approach to Tall buildings has been informed by the Urban Characterisation Study (2015) and the Tall Buildings Locations Validation Study (2015), which resulted in a detailed examination of the case for Tall buildings in the Borough and the identification of suitable locations. Figure 2.2 shows those areas of Haringey which are considered suitable for Tall buildings. Within these areas, the appropriate height of new development should be informed by the parameters set out in Policy DM6, having regard to the additional requirements set out in the Site Allocations relevant to and within those areas, and will require detailed urban design analysis which assesses the proposal in relation to the surrounding and much wider context. The Council will prepare further guidance on Tall buildings within these locations through a Tall Buildings and Views Supplementary Planning Document (SPD).
- 2.43** Development of inappropriate height and proposals for Tall buildings outside of the areas identified on Figure 2.2 will be resisted.

## **POLICY DM7: DEVELOPMENT ON INFILL, BACKLAND AND GARDEN LAND SITES**

- A** There will be a presumption against the loss of garden land unless it represents comprehensive redevelopment of a number of whole land plots.

- B** Development proposals for infill, backland and garden land should meet the requirements of Policies DM1 and DM2 and must:
- a** Relate appropriately and sensitively to the surrounding area as well as the established street scene, ensuring good access and where possible, retaining existing through routes;
  - b** Provide a site specific and creative response to the built and natural features of the area;
  - c** Where appropriate, repair or re-provide street frontages and provide additional passive surveillance and increased security;
  - d** Safeguard privacy, amenity, and ensure no loss of security for adjoining houses and rear gardens;
  - e** Retain and provide adequate amenity space for existing and new occupants;
  - f** Incorporate at least one street frontage or be ancillary to the host dwelling and the adjacent houses/terraces; and
  - g** Not result in 'gated' developments that prevent access which would normally be provided by a publicly accessible street.

- 2.44** The Council recognises that in order to meet the Borough's housing needs, optimising existing built sites may be necessary. Infill and backland development requires sensitive design in order not to detract from the character of the street scene, the architectural integrity and scale of adjacent buildings or from residential amenity.
- 2.45** Good access to development on backland sites is a key issue and will be an important factor when considering development applications. Emergency vehicles, refuse vehicles and delivery services need appropriate access while pedestrian access must to be safe for all users and avoid conflict with vehicles.
- 2.46** New development on these sites should ensure that existing pedestrian connections with the rest of the neighbourhood, whether formal or informal, are retained in order to ensure permeability and the integration of the new development. Gated sites are considered to be less secured due to the reduction of natural surveillance available to the site. They also harm the integration, permeability and cohesiveness of neighbourhoods. New developments on these sites should also not result in a loss of security to adjacent dwellings.

**2.47** NPPF paragraph 53 provides that local authorities may set policies to resist inappropriate development of residential gardens where they would cause harm to the local area. London Plan Policy 3.5 also supports a presumption against development on back gardens or other private residential gardens where this can be locally justified. The Urban Characterisation Study (2015) identifies various urban typologies where the built form relies on more or less regular street forms, building facades, and garden areas where developments on back gardens are likely to have a negative impact on the character of the area and the integrity of the street scene. Back gardens are also an important ecological resource and play a significant role in drainage and flood mitigation. The Council therefore considers back garden development to be inappropriate and at odds with the spatial strategy of the Borough – to focus development in growth areas well served by transport and local amenities. The exception is where sites can be assembled to bring forward comprehensive development that, in accordance with Policy DM1, can be designed to provide an appropriate layout consistent with the surrounding character and amenity.

**2.48** This policy implements Haringey's Strategic Local Plan Policy SP11 which seeks to ensure that new development in residential areas protects existing local character and residential quality. The policy also implements London Plan Policies 3.5 (Quality and Design of Housing Developments) and 7.4 (Local Character).

## POLICY DM8: SHOPFRONTS, SIGNS AND ON-STREET DINING

### Shopfronts

- A** The Council will require shopfronts, including their signs, security shutters and canopies, to be designed to a high standard and contribute to a safe and attractive environment. In particular:
- a** The Council will seek the retention of traditional shopfronts of distinctive character contributing to the visual, architectural or historic quality of the local townscape;
  - b** Replacement shopfronts should conserve original materials as far as possible;
  - c** The alteration or replacement of an existing shopfront or a new shopfront must allow for easy access by all members of the community;

- d** The Council will not support shopfront canopies fixed in the 'down' position. Retractable shopfront canopies may be acceptable where they are of an appropriate design and maintain sufficient clearance; and
- e** Security shutters should be open mesh and, wherever possible, be located internally.

### Signage

- B** Where required, the Council will grant consent for shopfront signage, including illuminated fascia signs and free-standing display panels, where they contribute to an attractive environment and do not:
- a** Cause a public safety hazard;
  - b** Contribute to clutter or a loss of amenity; or
  - c** Adversely impact the character or appearance of a conservation area.

### On-street dining

- C** Proposals for on-street/forecourt dining must demonstrate the suitability of the proposed location and should:
- a** Be integral and functionally related to the business;
  - b** Be distinct from the pavement space and provide sufficient space to not obstruct it; and
  - c** Be composed solely of moveable furniture.

**2.49** This policy aims to ensure that proposals for new shopfronts are of a high quality and relate well to the scale and character of the original building and surrounding area. Attractive shopfronts make a positive contribution to local distinctiveness and enhance the vitality of the shopping frontage as well as the wider town centre and area.

**2.50** The Council considers that the distinctive character of shopping areas could be maintained by retaining or designing high quality shopfronts that refer to the architecture of the host building, neighbouring units and general scale and rhythm of the shop front widths in the area. New shopfronts should contribute positively towards a cohesive streetscape and attractiveness of the shopping parade. Materials, detailing, craftsmanship and finishes are equally important in achieving high quality shop front design especially as they are viewed close-up.

**2.51** Shop fronts with poor quality materials, internally illuminated box fascias and intrusive signage add to visual clutter and detract from the appearance of the streetscape. Use of solid security shutters creates a fortress-like atmosphere in town centres and neighbourhood parades when premises are closed, perpetuating fear of crime and personal safety. To reduce visual clutter from the frontage, the grille box should be designed to be hidden behind the fascia.

- 2.52** Haringey has several vibrant town centres including historic centres such as Highgate, Muswell Hill, Crouch End, Green Lanes, Bruce Grove and West Green Road. These have their own local distinctive character and history (further detail can be found in the Urban Characterisation Study). Historic shopfronts should be retained and replacement shopfronts should respect, and where lost, reinstate, traditional features such as shop front framework features, pilasters, brackets, fascias and projecting signs. This is especially important where the shopfront would have an impact on the significance of a heritage asset or its setting.
- 2.53** Poorly designed or brightly illuminated shop fascias, over-large or inappropriately sited fascias or signage can detract from the visual quality of the shopping area. Attention must therefore be given to designing fascias and signs that are in scale and character with the building and surrounding streetscape.
- 2.54** On-street dining facilities can add to the vibrancy of shopping centres or public squares. However, these should not disrupt normal pedestrian movement or other high street activities. Where possible, such facilities should integrate with the public realm of the surrounding area. Temporary furniture is important as it allows flexibility of the space to be converted back to public use. Consideration of smoking areas or shelters will be necessary and may require planning permission. The Council may consider limiting the hours of use through the use of planning conditions.

## POLICY DM9: MANAGEMENT OF THE HISTORIC ENVIRONMENT

### Haringey's Heritage Assets

- A** Development that sustains and enhances the significance of a heritage asset and its setting will be supported.
- B** Proposals affecting a designated or non-designated heritage asset and its setting will be assessed against the significance of the asset and its setting, and the impact of the proposals on that significance. Applicants are required to submit with their planning application a statement describing the significance of the heritage asset(s) concerned, including any contribution made by its setting, along with an assessment and justification of the impact of the new development on the asset and its setting.

- C** When considering the impact of proposals on the historic environment, the Council will have regard to:
- The priority given to sustaining and enhancing the significance of a heritage asset and its setting;
  - Character appraisals and management plans or other guidance, where they are available;
  - The preservation or reinstatement of original or historic form, fabric, function or character of the asset and its setting;
  - The relationship with adjoining and neighbouring uses, particularly where these are heritage assets of significance in their own right;
  - The desirability of securing a viable use for a heritage asset consistent with its conservation;
  - An understanding of and respect for significance of heritage assets as parts of measures to mitigate and adapt to climate change; and
  - The contribution that the sensitive utilisation of heritage assets can make to sustainable regeneration.

### Conservation Areas

- D** Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or compliment the special characteristics and significance of the area.
- E** Proposals for alterations and extensions to existing buildings in Conservation Areas should complement the architectural style, scale, proportions, materials and details of the host building and should not appear overbearing or intrusive.

### Listed and Locally Listed Buildings

- F** In addition to (A-C) above, the Council will seek opportunities to secure the future of listed buildings particularly those on the 'Heritage at Risk' register, provided they:
- Do not lead to substantial harm or total loss of their significance;
  - Retain and repair existing features and fabric, or, if missing, replace them in a sympathetic manner;

- c Do not harm the structural integrity or stability of the building or that of adjoining buildings or structures; and
  - d Extensions are restricted to less significant parts of the building, relate sensitively to the original building and not adversely affect the internal or external appearance or character of the building, curtilage or its setting.
- G Subject to (A-C) above, the Council will seek to protect the local distinctiveness of the Borough by sustaining and enhancing the significance of locally listed buildings.

#### Archaeology

- H Proposals affecting a designated Archaeological Priority Area will be considered having regard to:
- a The significance of an archaeological asset and its setting;
  - b The impact of the proposal on archaeological assets; and
  - c The priority given to preserving and managing the archaeological asset and its setting in situ.
- I All proposals will be required to assess the potential impact on archaeological assets and where appropriate ensure adequate arrangements for the investigation, recording and archiving of assets of archaeological importance and engage with the relevant advisory organisations.

#### Enabling development

- J The Council will approve proposals for enabling development where it is demonstrated that:
- a It is the only viable means of securing the long term future of the asset affected; and
  - b It is the optimum viable use, supported by an appropriate options appraisal; and
  - c The proposals address relevant policies (A-I) above. Proposals that cause harm should be exceptional in relation to the significance of the asset, and be clearly and convincingly justified in line with national policy.

- 29 conservation areas;
- 471 statutory listed buildings of special architectural or historic interest;
- 1,150 locally listed buildings of merit;
- 2 statutory registered parks & gardens of special historic interest;
- 34 local historic green spaces;
- 23 designated sites of industrial heritage interest; and
- 22 archaeological priority areas.

**2.56** Designated heritage assets include: Scheduled Ancient Monument, Listed buildings including listed war memorials and historic street furniture, conservation areas and registered parks and gardens. Non-designated heritage assets include: Archaeological Priority Areas and Zones, locally listed buildings, unlisted war memorials, unlisted historic street furniture and local parks and gardens.

**2.57** Conservation and management of the historic environment are central to the delivery of sustainable development. The NPPF recognises that heritage assets are an irreplaceable resource and should be conserved in a manner which is appropriate to their significance. It includes a suite of policies to guide the consideration of the impact of development proposals in this regard. Policy DM9 helps give effect to the NPPF and Policy SP12, providing further local considerations for weighing the significance of assets affected and the extent of impacts, whether positive or negative.

**2.58** Heritage statements will be required to set out how development proposals will conserve, enhance or restore a heritage asset and its setting. The level of detail provided in the statement should be proportionate to the agreed importance of the asset, having regard to its significance and potential impact on this. The Council strongly advises applicants to seek the advice of specialist historic consultants, particularly where a proposal is likely to result in significant harm to an asset. The Council also encourages applicants to consult with amenity organisations including the Georgian Group, the Victorian Society, the 20th Century Society, the London Parks and Gardens Trust and other local heritage societies, including Haringey's Conservation Advisory Committees.

**2.59** In establishing the significance of the asset, the Council would expect applicants to use good practice guidance to assess the elements that are of highest, moderate and low significance and those that detract from the significance. These findings should inform the design of the proposal and demonstrate how any proposed work would sustain and enhance the significance of the asset, relative to their assessment. For example, proposals would be expected to have least impact on elements of high significance and there would be more flexibility in altering elements that are of least or no significance. Where there is evidence of deliberate neglect or damage to a heritage asset, the current condition of the asset will not be taken into account in any planning decision.

## Managing Haringey's Heritage Assets

- 2.55** Haringey has a rich and varied history which is documented through the Borough's wide range of heritage assets. Individually and collectively these assets contribute to the enjoyment of life in the Borough and play a key role in shaping local character and identity. The Strategic Policies Local Plan seeks to protect and positively manage the historic significance of Haringey's heritage assets, including their immediate and wider setting. As set out in Policy SP12, Haringey's historic environment comprises:



- 2.60** Heritage assets must be proactively managed in order to be sustained for the enjoyment of current and future generations. Haringey's Local Plan aims to facilitate appropriate new development and through this process capitalise on opportunities to preserve, restore and enhance the historic environment. There are many ways in which this can be achieved and at different scales of development - for example, through the reinstatement of architectural features with smaller householder works to more complex projects involving considerable adaptive re-use of buildings for wider public amenity and to support the visitor economy. The Council takes a positive view of development and change where this is consistent with conservation and other sustainability objectives. This approach is supported by Historic England, in particular with its 'Constructive Conservation' principles.<sup>1</sup>
- 2.61** The incremental loss of architectural and other design details has a cumulative negative impact on the integrity of the historic environment. Where opportunities arise through new development, proposals should seek to reinstate or restore original features including through the removal of harmful alterations or other inappropriate additions. Conservation Area Appraisals and Management Plans should be referred for further information in this regard.
- 2.62** The Council recognises that in order to make heritage assets fit for contemporary use they may require changes to deliver energy efficiencies and greater resilience to climate change. However mitigation and adaptation should avoid harming intrinsic qualities that contribute to significance of heritage assets or their settings. Historic England provides that it is possible to respond to climate change and improve the energy efficiency of older buildings without destroying their distinctive character and value.<sup>2</sup> This policy supports sustainable retrofitting of heritage assets (in line with Policy DM21) but where there is a conflict between delivering sustainability measures and the potential to cause damage to the significance of the heritage asset, priority will be afforded to the preservation of the heritage asset.
- 2.63** The Council considers that historic buildings can provide a foundation for the regeneration planned in various parts of the Borough such as Tottenham. Regenerating heritage assets can anchor new development, reinforce a sense of community, make an important contribution to the local economy and act as a catalyst for improvements to the wider area.

## Conservation Areas

- 2.64** Haringey's Conservation Areas play an important role in shaping local character and creating sense of place. The Council has a duty to preserve the character of Conservation Areas under the provisions of Section 72 of the Planning (Listed Building and Conservation Areas) Act, 1990. The significance of a conservation area is derived much more from its townscape rather than the individual buildings, such as- historic plot boundaries, street patterns, and building and roof lines. Proportion of windows, doors and chimney stacks add to the rhythm of street frontages. Other features such as front boundaries, landscaping and public realm also contribute to the character of the area. Not all elements of a conservation area, however, will contribute to its significance and their replacement and alterations can represent opportunities for the enhancement of the area, including enhancement by development of high quality and innovative design. The emphasis is to guide and manage development, not prevent it.
- 2.65** New development, including extensions and alterations, should therefore positively respond to the spatial qualities of Conservation Areas by preserving and enhancing those elements that make them unique. By engaging with the Haringey Development Charter (Policy DM1), proposals within Conservation Areas will be expected to demonstrate consideration not only for the design treatment of individual buildings but also their wider setting.
- 2.66** Conservation Areas can be enhanced through the sensitive redevelopment of sites. Opportunities include the removal of buildings or features which detract from the character and appearance of the area, the adaptive re-use of redundant buildings and new infill development on disused land or under-utilised sites. This policy provides support for such redevelopment where it contributes to the objectives of conserving and enhancing Haringey's historic environment. Proposals should seek to reinstate original features of significance where these have been lost or damaged, or otherwise improve the site to make it more sympathetic to the Conservation Area.
- 2.67** The Council has a programme for the preparation and revision of Conservation Area Character Appraisals and Management Plans. Copies of adopted Appraisals and Management Plans and details of the programme for new and revised ones are available on the Council's web site. These provide important guidance on conservation areas, the relative significance of heritage assets within them and signpost key features of the historic environment that contribute to their significance. Applicants should refer these documents, where available, as part of their engagement with the Development Charter (Policy DM1) and to consider the impact of development proposals. The Council may in the future prepare additional supplementary planning guidance, which, along with character appraisals and management plans, will be a material consideration in planning decisions. The Council also encourages applicants to refer relevant good practice guidance, such as that published by Historic England.

<sup>1</sup> Constructive Conservation: Sustainable Growth for Historic Places. English Heritage, March 2013.

<sup>2</sup> English Heritage "Heritage Counts 2008: Climate Change"

- 2.68** The Council will prioritise those areas that are identified as ‘at risk’ by Historic England and use its enforcement powers to ensure that further loss of architectural details and insensitive alterations are avoided or reversed.
- 2.69** The Council has implemented Article 4 Directions in four Conservation Areas where planning permission is required for alterations and extensions that would otherwise fall under Permitted Development. The Council will continue to review the effectiveness of this approach and may consider widening its scope in the future.

## Listed and Locally Listed Buildings

- 2.70** In addition to the Borough’s substantial number of statutory listed heritage assets, there are also 1,150 locally listed buildings of merit. These statutory and locally listed buildings are valued heritage assets and vital parts of Haringey’s local character and identity.
- 2.71** The Council has a duty to preserve the character of listed buildings under the provisions of Section 66 of the Planning (Listed Building and Conservation Areas) Act, 1990. Proposals for alterations, or to erect a new building/structure in close proximity to listed buildings should not adversely affect their significance, character, appearance or setting. The integrity and authenticity of a listed building can be substantially harmed over time by the cumulative impact of works which may individually cause minor harm.
- 2.72** Historic England maintains a Heritage at Risk register to assist in the monitoring and management of those listed buildings which are at risk of losing their significance due to decay or unsympathetic alterations. The Council has statutory authority to intervene when there is evidence of serious neglect, including Urgent Works Notices and Repairs Notices to secure the repair of vacant listed buildings at risk. However in promoting a more positive approach to conservation management, this policy seeks to ensure a viable future for listed buildings by preventing them from becoming at risk in the first place. Whilst national policy provides for enabling development (see Policy DM9.J and supporting text below) the Council seeks to avoid the need for such development by positively managing assets.
- 2.73** In accordance with NPPF paragraph 135, the Council recognises that non-designated heritage assets such as locally listed buildings often play a crucial role in anchoring local visual and historic identity. These assets may also act as a significant focus encouraging urban vitality, environmental quality and regeneration. The Council attaches special importance to their protection. Where planning permission is required consideration should be given to appropriate preservation or enhancement.

## Archaeology

- 2.74** The Council is committed to securing the conservation and understanding of all historic assets including those of archaeological interest. Archaeological remains are the principal surviving evidence of the Borough’s past. These assets, along with opportunities to exploit their contribution to public education and enjoyment, are vulnerable to new development where its potential impacts have not been fully considered. The heritage value of archaeological remains is diminished once they are removed from their original location or lost altogether.
- 2.75** Locations within Haringey which are suspected to contain below ground archaeology are identified on the Policies Map as Archaeological Priority Areas. Applicants should refer these areas when considering site development opportunities and assess whether sites are known or likely to contain archaeological remains. The Council will require the submission of an archaeological evaluation report if it considers there are assets of importance on site. Where archaeological remains are found, the Council will seek to ensure that the remains and their settings are permanently preserved and managed in situ. If it is suitably demonstrated that this is not possible, a programme of conservation will be required including satisfactory excavation and recording of remains on site along with arrangements for archiving. Where remains can be preserved in situ, developments should seek opportunities to provide for public display and interpretation.
- 2.76** Applicants should seek advice from, and the Council will consult, GLAAS (Greater London Archaeological Advisory Service) and, where appropriate, Historic England, in all applications relating to Archaeological Priority Areas and supporting the positive management of archaeological assets.

## Enabling development

- 2.77** The National Planning Policy Framework sets the basis for “enabling development” that is needed to secure the long-term future of heritage assets. The Council is committed to ensuring all reasonable steps have been taken to sustain heritage assets without compromising the integrity of their significance, however recognising there may come a point where enabling development is necessary. The Council will consider relevant proposals in line with the NPPF, provided the applicant can suitably demonstrate the enabling development is the only viable means of securing the future of the asset.
- 2.78** In considering proposals, the Council will seek a viable use for enabling development that enables the maximum preservation and enhancement of heritage assets and their setting. National planning guidance makes clear that the optimal viable use is the one likely to cause the least harm to the significance of the asset, not just through necessary initial changes, but also as a result of subsequent wear and tear and likely future changes. The optimum viable use may not necessarily be the most profitable one.

# Housing

CHAPTER

03

## Introduction

- 3.1** The National Planning Policy Framework (NPPF) sets out the requirements for local authorities to identify, and set policies to respond to, housing need in order to support the delivery of sustainable, inclusive and mixed communities. The London Plan (2015) provides the strategic planning framework against which Haringey sets its local housing policies.
- 3.2** The Council seeks to ensure that everyone has the opportunity to live in a decent home, at a price they can afford, in a community they are proud of. In order to achieve this, Haringey's Local Plan will facilitate the delivery of a minimum of 19,802 new homes on previously-developed land within the Borough by 2026. Strategic Policy SP1 directs new housing to areas identified as having capacity to accommodate growth, primarily within Tottenham and Wood Green. Strategic Policy SP2 seeks to ensure that housing growth across the Borough makes provision for an appropriate mix of high quality housing, including affordable housing, that meets Borough-wide needs but is also tailored to local circumstance.
- 3.3** The following housing policies give effect to Haringey's Strategic Policies. In particular, they seek to ensure that:
- The optimum housing capacity is achieved on individual sites;
  - New housing developments, including mixed use schemes, help to secure communities that are inclusive to everyone and are appropriately mixed in terms of demographics, household types and tenure;
  - Individual sites maximise their contribution towards the delivery of affordable housing, and collectively, to meeting Haringey's identified housing needs and the strategic Borough target of 40%;
  - Housing estates are renewed and the quality of the existing housing stock is significantly improved;
  - Specialist forms of housing are encouraged to meet identified local needs;
  - Existing family housing is maintained; and
  - Conversions, basement extensions, Private Rented Sector housing, and Houses in Multiple Occupation are appropriately managed.

## POLICY DM10: HOUSING SUPPLY

- A The Council will support proposals for new housing on sites allocated for residential development, including mixed-use residential development, within the Site Allocations Local Plan and Area Action Plans.
- B The Council will resist proposals for the development of alternative uses on allocated sites which are considered particularly suitable for general and specialist housing, unless it can be demonstrated that there is an overriding public benefit.
- C The Council will resist the loss of all existing housing, including affordable housing and specialist forms of accommodation, unless the housing is replaced with at least equivalent new residential floorspace.
- D Windfall development will be considered acceptable where this complies with the relevant policies of this Plan.

- 3.4** The Council has allocated sufficient sites within the Site Allocations Local Plan and Area Action Plans to meet both its objectively assessed housing need and the Borough's strategic housing target within the London Plan. The delivery of allocated sites is prioritised by the Council, having been assessed as suitable for residential accommodation, deliverable within the plan period, and in accordance with the spatial strategy for the Borough.
- 3.5** Whilst allocated sites are prioritised, the Council anticipates proposals for windfall development to continue to come forward. Where they are deemed to comply with the relevant policies of the Plan, windfall developments will make a valuable contribution to Haringey's housing supply over and above the sufficient allocated sites, providing a reasonable level of contingency against delivery of the Borough's strategic housing target.

## POLICY DM11: HOUSING MIX

- A Proposals for new residential development, including mixed-use schemes comprising residential accommodation, should provide a mix of housing having regard to:
  - a Individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed;

- b The target mix for affordable housing, in accordance with Policies SP2 and DM13, and the Council’s Housing Strategy;
  - c The priority afforded to the delivery of affordable family housing;
  - d The need to optimise housing outputs on sites; and
  - e The need to achieve mixed and balanced sustainable communities.
- B** The Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach (see Policies DM1 and DM2), also having regard to the findings of the Haringey Urban Characterisation Study (2015).
- C** The Council will not support proposals which result in an overconcentration of 1 or 2 bed units unless they are part of larger developments or located within neighbourhoods where such provision would deliver a better mix of unit sizes which include larger and family sized units.
- D** Proposals for comprehensive renewal of a social housing estate will be required to re-provide the existing affordable housing on an equivalent habitable room basis, tailored to better meet current housing needs and the achievement of more inclusive and mixed communities.
- E** Institutional investment which provides long-term investment in the private rental sector (not including accommodation for students) will be supported by the Council where it meets local housing needs and is of a high quality and consistent with the policies in this Plan, including the requirement to provide affordable housing.

**3.6** Haringey has some of the most deprived and polarised communities in the country. Ensuring mixed and balanced communities, particularly in areas dominated by social and affordable rented housing, is integral to achieving the Local Plan objectives of delivering sustainable development and growth. It is also in line with London Plan Policy 3.9. The redevelopment of previously developed land across the Borough offers the opportunity to consider the existing housing typologies within and across neighbourhoods and the Borough as a whole, and to ensure that the mix of new residential development is appropriate to its local context, as well as targeted to meeting specific local housing needs and improving housing choice.

**3.7** On existing Council-owned housing estates, the condition and need for investment in the current housing stock, combined with their geographic concentration, has an impact on the overall quality

of life in these neighbourhoods. In accordance with Policies SP2 and DM13, the renewal of social housing estates provides the opportunity to improve housing conditions, whilst re-provision on a habitable room basis increases capacity for re-housing families into suitable size accommodation. Significant cross-subsidy is likely to be required through provision of enabling market housing, as well as shared ownership products, offering also the potential to create more inclusive mixed tenure communities.

**3.8** Equally, the Council will robustly seek the provision of new affordable housing development in areas of Borough where it is currently under represented.

**3.9** The private rental sector (PRS) in Haringey is becoming increasingly important in providing housing choice in London. PRS, as part of the mix of new housing provision across the plan period, can also assist in increasing housing delivery rates – a significant attribute given past completion rates and the quantum of growth planned, especially within the growth areas of the Borough. However, the Council is keen to ensure that purpose built private rented sector accommodation is of a high standard and provided as a long-term investment in the Borough, and will seek to apply an appropriate length of covenant to secure its retention. For clarity, whilst the private rental sector may provide a cheaper alternative to owner occupation, for the purpose of planning these units are treated as conventional market housing (Use Class C3) and are subject to affordable housing contributions.

**3.10** In accordance with Policy SP2, residential development in Haringey should have regard to the density matrix set out in the London Plan. The density ranges set out in the matrix are a pan-London benchmark of appropriate densities based on transport accessibility and broad location settings. Whilst useful, the matrix is but one consideration or tool to be used in informing the appropriate development density applicable to an individual site. Other considerations should include local context, site specific circumstances, housing need, housing choice, and the achievement of quality design being of equal weighting.

**3.11** Development proposals should seek to ensure they meet local needs by providing an adequate mix of dwelling sizes (in terms of occupancy defined in terms of bed spaces) to reflect local housing needs and better deliver balanced communities. The purpose of Policy DM11.C is to ensure that new housing meets the housing needs of the population – for market, rented, social and intermediate housing – in order to create mixed and inclusive communities. The mix of dwelling sizes appropriate to specific developments will be considered in relation to the character of the development, the site, the area and the mix of unit sizes within the locality. Developers should demonstrate how the mix of dwelling sizes meets the housing size mix requirements and is appropriate to the site’s location.

## POLICY DM12: HOUSING DESIGN AND QUALITY

- A All new housing and residential extensions must be of a high quality, taking account of the privacy and amenity of neighbouring uses (See Policy DM1) and are required to meet or exceed the minimum internal and external space standards of the London Plan and the Mayor's Housing SPG.
- B Ground floor family housing should provide access to private garden/amenity space, and family housing on upper floors should have access to a balcony and/or terrace, subject to acceptable amenity, privacy and design considerations, or to shared amenity space and children's play space.
- C In areas of especially poor residential environmental quality, development proposals should seek to include enhanced provision of green infrastructure, including the quantity and quality of landscaped areas, tree provision and, where the site allows, the provision of additional open space.
- D Mixed tenure residential development proposals must be designed to be 'tenure blind' to ensure homes across tenures are indistinguishable from one another in terms of quality of design, space standards and building materials.

### Residential Extensions

- E Extensions or alterations to residential buildings, including roof extensions will be required to be of a high, site specific, and sensitive design quality, and respect and/or complement the form, setting, period, architectural characteristics, detailing of the original buildings, including external features such as chimneys, and porches. High quality matching or complementary materials should be used appropriately and sensitively in relation to the context.
- F New rooms created by an extension should comply with space and amenity requirements set out in the London Plan Mayor's Housing SPG.

- 3.12 Improving the quality of housing in Haringey is a key priority for the Council. The above policies aim to ensure delivery of high quality housing which provides a good quality of life for occupants, and is compatible with and contributes to the distinctive character and amenity of an area, whilst also delivering upon the Council's aim to optimise housing delivery on individual sites.

- 3.13 The Council expects that residential extensions and alterations are well designed to create a good quality living environment, whilst protecting the amenity of adjoining neighbours and the integrity of the local residential character.
- 3.14 Extensions to residential buildings should therefore be subordinate in scale to the original building, as well as respect the architectural unity of a block or terrace of houses and the urban grain and character of the surrounding area. New development should not undermine existing uniformity of the building or terrace, and should not over balance or dominate existing features important to the building.
- 3.15 Full width rear extensions are not normally considered acceptable and they should be lower than the ridge height of the host building. Depth of the rear extension should be such that the resulting footprint is subordinate to the main house and does not have a negative impact on the amenity of neighbouring properties, ensuring no overlooking or inappropriate loss of daylight and sunlight.
- 3.16 Extensions to the roof, such as dormer windows, should be restricted to the rear and their size, location and design should be such that they appear subordinate on the roof. Front dormers would not normally be permitted unless they are already part of the established local character and sensitively designed to contribute positively to the roofscape.
- 3.17 The Council considers that there are exceptional circumstances for residential extensions in South Tottenham that merit further considerations. Proposals will therefore be expected to have regard to the South Tottenham House Extensions Supplementary Planning Document.

## POLICY DM13: AFFORDABLE HOUSING

- A The Council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes with site capacity to accommodate more than 10 dwellings, having regard to:
  - a Policy SP2 and the achievement of the Borough-wide target of 40% affordable housing provision;
  - b The need for 60% provision to be social/affordable rent and 40% intermediate housing;
  - c The preferred affordable housing size mix as set out in the Council's Housing Strategy;
  - d The individual circumstances of the site;

- e The availability of public subsidy;
  - f Development viability; and
  - g Other planning benefits that may be achieved.
- B** The affordable housing requirement will apply to:
- a Sites that are artificially sub-divided or developed in phases;
  - b Additional residential units that are created through amended planning applications;
  - c Additional residential units proposed above that granted by permitted development;
  - d Unsecured student accommodation (see Policy DM15);
  - e e. All forms of Use Class C3 housing; and
  - f The total (gross) residential units to be delivered on the site.
- C** The Council may seek to alter the tenure and/or mix of affordable provision to be secured on a case-by-case basis to avoid affordable housing of a certain tenure or size being over or under represented in an area, or to assist in improving development viability (e.g. through provision of a greater ratio of intermediate housing).
- D** In negotiating the level of affordable housing provision viability assessments must be based on a standard residual valuation approach, with the benchmark existing use land value taken as the existing/alternative use value.
- E** To maximise affordable housing output on schemes with a long build out period and/or at times of economic uncertainty, the Council will require the use of ‘cascade agreements’ and ‘contingent obligations’ as defined by the London Plan and set out in the Planning Obligations SPD.
- F** On-site provision of affordable housing will be required. Only in the following exceptional circumstances may an off-site provision be acceptable - where a development can:
- a Secure a higher level of affordable housing on an alternative site.
  - b Secure a more balanced community.
  - c Better address priority housing needs.
- G** The Council will seek to achieve 20% of new units on small sites to be achieved as affordable, in line with SP2 and set out in the Planning Obligations SPD.
- H** Cash in-lieu contributions are only acceptable as a last resort and are also subject to the exceptional circumstances listed above.

- 3.18** The latest Strategic Housing Market Assessment (SHMA) (2014) identifies an affordable housing requirement deficit of 11,757 homes by 2026, which equates to 59% of the total net housing requirement of 20,361 households for the Borough of all tenures over the same period (2011 – 2026). This demonstrates that the ‘need’ for affordable housing continues to be significantly greater than the ‘supply’ of affordable housing.
- 3.19** Policy SP2 sets an ambitious target for Haringey to deliver a minimum of 600 affordable homes per annum. To give effect to Policy SP2, the above policy seeks to maximise the supply of new affordable housing without constraining overall housing delivery. It also recognises that there may be opportunities within different parts of the Borough, on a scheme by scheme basis, to achieve more than the strategic target.
- 3.20** While the SHMA suggests there is a significant shortfall in one and two bedroom dwellings, the priority afforded to family affordable housing recognises that the shortage relative to supply of affordable housing is greatest for three or more bedroom properties.
- 3.21** Whilst the expectation is for on-site provision of affordable housing in line with the prescribed tenure split, in all negotiations the Council will seek to secure affordable housing that achieves sustainable communities, including provision that best meets local housing needs. Further detail on the Council’s procedures for securing affordable housing are set out in the Planning Obligations SPD, which includes guidance on the exceptional circumstances where off-site or cash-in-lieu payment may be acceptable, and how a comparable payment may be calculated.

## **POLICY DM14: SELF BUILD AND CUSTOM BUILD HOUSING**

- A** Planning applications for ‘self or custom build’ housing, built or commissioned by individuals or groups of individuals for their own occupation, will be supported by the Council.
- B** The Council will seek to identify plots for self and custom build housing across a range of tenures where the need is identified.
- C** Self or Custom build housing is by definition C3 housing and is subject to the requirements of Haringey’s Local Plan, including affordable housing (see Policy DM13), housing design and quality (see Policies DM1,DM2 and DM12), and planning obligations (see Policy DM48).

- 3.22** The Council will support individuals or groups of individuals that wish to build their own homes as a more affordable means by which to access home ownership.
- 3.23** The Council considers self or custom build units to be an additional source of supply of conventional housing and a further housing choice. The sites required to accommodate self or custom build units are likely to be sites with limited large scale housing potential but could, with the input from an innovative architect, provide an exemplar and bespoke housing scheme which would provide high quality accommodation at a lower cost than 'built for sale' market housing.
- 3.24** There is also potential through the construction phase of self or custom build development to support the local economy by providing work for local builders and tradesmen and maximising the use of local supply chains. Where appropriate, the Council will seek to secure benefits to the local economy through the use of planning obligations.
- 3.25** While the Council is generally supportive of proposals for self or custom build units, it is important that applications for self or custom build do not compromise the ability of the Council to meet housing needs, particularly in Haringey's growth areas or areas of change. Therefore applications for this type of housing will be subject to the same requirements as all housing schemes, including density, design, and environmental performance.
- 3.26** In accordance with the NPPF, the Council is committed to collecting evidence to understand the need for self and custom build, and to plan for the identification and allocation of sites once the level of need is known. The Council will monitor expressions of interest and direct people to GLA's self build housing register<sup>3</sup> and wherever possible to individual landowners.

## POLICY DM15: SPECIALIST HOUSING

### Special Needs Housing

- A** Proposals for development that would result in the loss of special needs housing will only be granted permission where it can be demonstrated that there is no longer an established local need for this type of accommodation or adequate replacement accommodation will be provided.

- B** The Council will support proposals for new special needs housing where it can be shown that:
- There is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey's Housing Strategy and Older People Strategy;
  - The standard of housing and facilities are suitable for the intended occupiers in terms of:
    - The provision of appropriate amenity space, parking and servicing;
    - The level of independence; and
    - Necessary level of supervision, management and care/support;
  - There is a good level of accessibility to public transport, shops, services and community facilities appropriate to the needs of the intended occupiers; and
  - The impact of the proposed development would not be detrimental to the amenity of the local area or to local services.

### Student Accommodation

- C** Where further student accommodation is required to meet local and strategic need, it will be supported where it is appropriately located within:
- One of Haringey's Growth Areas, as identified in the Strategic Policies Local Plan; or
  - Within or at the edge of a town centre; and
  - In an area of good public transport accessibility.
- D** In addition to meeting the requirements of (C) above, proposals for student accommodation will also need to demonstrate that:
- There would be no loss of existing housing;
  - There would be no adverse impact on local amenity, in particular, the amenity of neighbouring properties and on-street parking provision;
  - The accommodation is of a high standard, including adequate unit size and compliance with daylight and sunlight standards;
  - Provision is made for units that meet the needs of students with disabilities;
  - The need for the additional bedspaces can be demonstrated; and
  - The accommodation can be secured by agreement for occupation by members of a specified educational institution(s), or the proposal will provide an element of affordable student accommodation.



- E** The Council will support proposals for the provision of new hostels and secured accommodation where:
- a They do not involve the loss of permanent housing or existing satisfactory shared accommodation;
  - b They will not result in an overconcentration of provision in an area;
  - c They are located close to public transport, shops and services;
  - d The scale and intensity of hostel use or secured accommodation is appropriate to the size of the building;
  - e There would be no adverse impact on the amenity of neighbouring properties or the character of the area; and
  - f The standard of accommodation and facilities, including safety and security, is suitable for the intended occupiers.
- F** Proposals involving the loss of an existing hostel will need to demonstrate that:
- a The accommodation is no longer needed or there is alternative provision available in the immediate area; or
  - b The existing accommodation is not fit for purpose for its continued current use and re-provision is unviable.

## Special Needs Housing

- 3.27** Special needs housing relates to housing that includes an element of care and support. It comes in a variety of models or types and can be defined differently within the Use Class Order. The London Housing SPG (2011) provides useful definitions which should be taken account of when proposals are received by the Council, including a description of extra care housing, residential care homes and sheltered housing.
- 3.28** It remains a priority for the Council to provide safe environments which facilitate independent living for vulnerable residents and older people in Haringey. Poor health and disability can be affected positively or adversely by housing circumstances and the level of care and support available. Whilst the provision of lifetime and wheelchair homes, alongside personal budgets, provides many people with the ability and choice to remain independent for longer in their own home, for others, such as those with learning disabilities, physical disabilities and mental health needs, there is a need for a broader range of supported housing options, including a range of tenure types and levels of care and support.



Specialist Housing

- 3.29** While the Council maintains that the supply of specialist housing be market led, it will monitor applications and completions having regard to the indicative benchmark for Haringey as set out in Table A5.1 in the London Plan<sup>4</sup>.
- 3.30** The Council will seek to work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites.

## Student Accommodation

- 3.31** Meeting conventional housing needs remains the priority for the Council. However, it is recognised that London has an emerging reputation as a world city for higher and further education, and that Haringey has a role to play in fostering relationships with existing higher education institutions and those looking to establish in the Borough, including meeting their needs for purpose built student accommodation. The London Plan sets a strategic student accommodation requirement for London based on the Mayor's Academic Forum's projections. The Mayor will prepare further planning guidance on how such accommodation should be defined and delivered.
- 3.32** The Council recognises that the right type of provision, in the right locations – within Growth Areas and town centres- can make a significant contribution to the local economy, aiding regeneration, as well as encouraging students out of shared rented accommodation in family sized properties; thereby releasing these properties back into the market and reducing demand.
- 3.33** The Council will require that student accommodation is secured by planning agreement or legal condition relating to the use of the land or to its occupation by members of a specified educational institution. Where there is not an undertaking by a specific educational institution, providers will be expected to deliver an element of student accommodation that is affordable for students. The London Plan sets out further details in this regard.

<sup>4</sup> The London Plan Table A5.1 suggests an indicative benchmark of 100 specialist housing units for Haringey annually, comprising 80 private sale and 20 intermediate sale, for the period 2015 - 2025.

## Residential Hostels and Secured Accommodation

**3.34** Residential hostels and secured accommodation are a necessary component of social care provision. They provide suitable temporary accommodation and, subject to appropriate management and safeguards for occupiers and neighbouring residents, can help to integrate vulnerable people, homeless households and special needs groups into the community. However, an overconcentration of temporary accommodation, or provision in parts of the Borough with poor access to public transport and/or services, is unlikely to meet the needs of occupiers or achieve social integration.

- B** Conversions within the Family Housing Protection Zone will only be considered acceptable where they comply with criteria (b – g) above and result in no net loss in the number of family sized units.
- C** Where existing garden land is available the Council will seek to optimise the total amount of private amenity space and access to this space for residents.
- D** All residential conversions should be supported by a car parking survey which demonstrates that there is residual car parking supply to meet the need created by the proposal.

## POLICY DM16: RESIDENTIAL CONVERSIONS

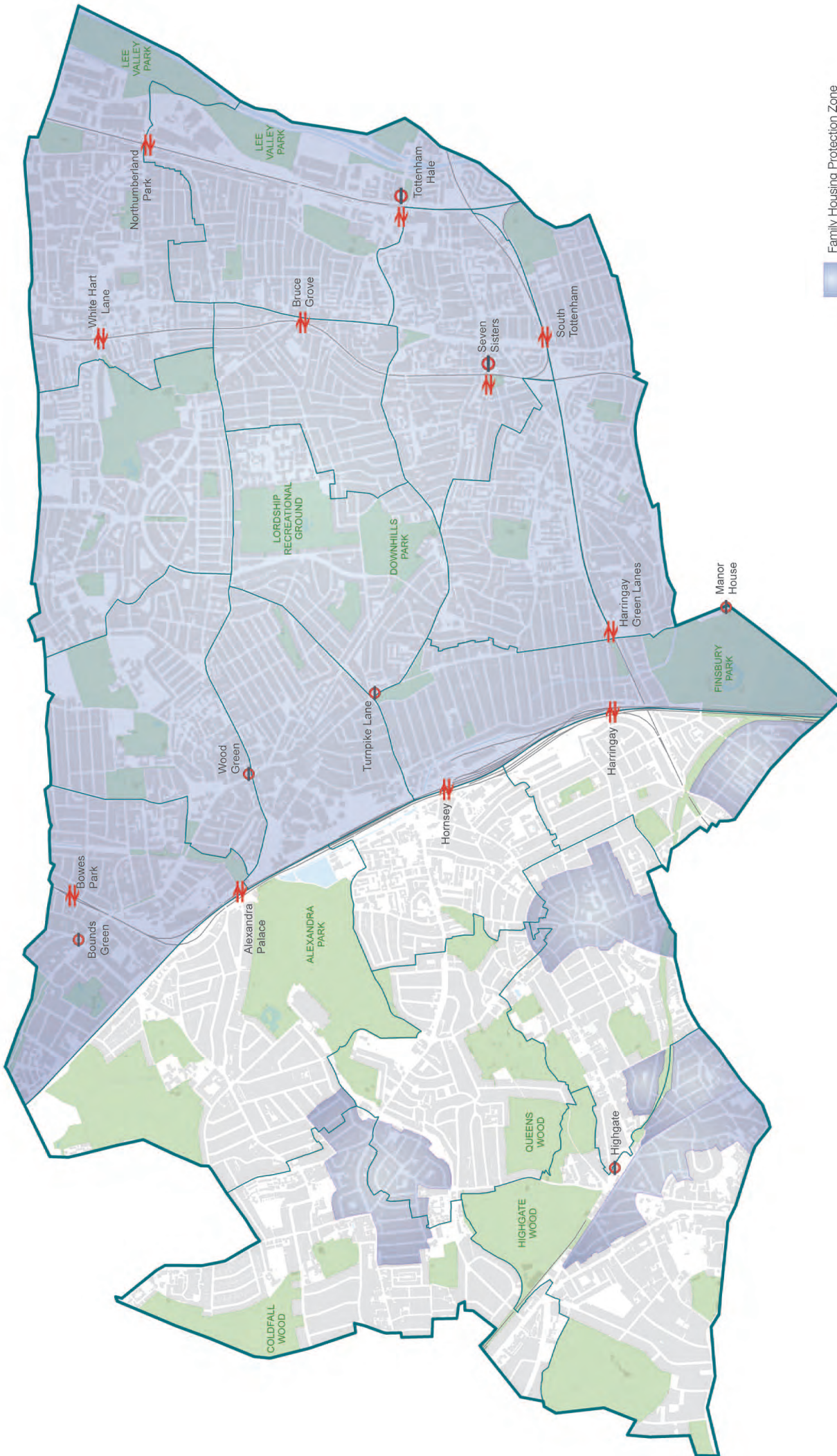
- A** To maintain a supply of larger family homes to meet Haringey's housing need, the Council will only permit the conversion of a larger home(s) to small self contained homes (Class C3) where:
  - a** It is located outside of the Family Housing Protection Zone as shown on Figure 3.1;
  - b** The gross original internal floor space of the existing dwelling is greater than 120m<sup>2</sup>;
  - c** The proposal satisfies all other relevant policies, including the minimum internal space standards, the provision of satisfactory levels of amenity space, privacy, daylight, parking and access, and adequate and convenient refuse storage and collection;
  - d** The resulting units achieve internal configurations that are practical and fit for purpose, including vertical and horizontal stacking arrangements that minimise noise transfer between homes, including neighbouring homes;
  - e** The design of any external alterations does not detract from the appearance of the property or the street scene and, wherever possible, retains a single door to the front elevation of dwellings in residential areas;
  - f** The balance of hard and soft landscaping on the forecourt (including forecourts that are already substantially hard-surfaced) does not detract from the appearance of the property or the street scene; and
  - g** The proposal provides for a mix of unit sizes (i.e. proposals which seek to maximise the number of one bedroom or studio units will not be acceptable where an alternative mix including larger units could be practically provided).

**3.35** Conversions have historically made a relatively small but consistent contribution to increasing Haringey's housing supply (circa 7% per annum). Where conversions have taken place, they have tended to concentrate to the east of the East Coast Mainline and within specific parts of the west of the Borough. The incremental cumulative impact of conversions over the past 20 years has resulted in these areas experiencing unsatisfactory levels of on-street parking and congestion, increased pressure on local services, adverse changes to residential character and amenity, as well as a significant loss in the availability of family housing for which there is strong need. The latter is of particular concern to the Council and its aspirations to retain economically active families in Borough, to encourage households to put down roots, and to address overcrowding and its associated health and wellbeing impacts.

**3.36** For the reasons identified above, and the fact that the Local Plan is not reliant on conversions to meet its strategic housing target, the Council will restrict further residential conversions in areas of the Borough identified as already having a high concentration of converted properties. This will ensure the Council can protect the remaining existing stock of family houses within these areas (see Figure 3.1 'Family Housing Protection Zone'<sup>5</sup>), and to ensure that, across the Borough, the range of Haringey's housing needs can be met.

**3.37** Outside of the 'Family Housing Protection Zone', conversions will be permitted where they comply with the relevant policies of the Plan, which seek to ensure all development achieves a high standard of design and amenity, as well as the bespoke criteria specific to the challenges and constraints posed by the conversion of an existing larger dwelling into flats. This will ensure that the resultant homes are, as far as is practical, consistent with the policy objectives for new build residential accommodation.

<sup>5</sup> Previously known as 'Restricted Conservation Areas' in the Haringey Unitary Development Plan (July 2006)



**FIGURE 3.1** Family Housing Protection Zone

## POLICY DM17: HOUSES IN MULTIPLE OCCUPATION

- A Proposals for the conversion of larger homes to Houses in Multiple Occupation (HMO), including small HMOs (3-6 unrelated people) within the area covered by the Article 4 Direction (as shown in Figure 3.2), will only be permitted where:
- a The gross original internal floor space of the existing dwelling is greater than 120m<sup>2</sup>;
  - b They do not give rise to any significant adverse amenity impact(s) on the surrounding neighbourhood, including cumulative impacts arising from an over-concentration of HMOs within an area;
  - c They satisfy the appropriate Haringey Environmental Health Standards;
  - d They are accessible by public transport, cycling and walking;
  - e They provide high quality accommodation that satisfies the relevant policies of the Local Plan, including internal space standards, provision of a satisfactory level of amenity space for occupants, and adequate and convenient refuse storage and collection; and
  - f Where non self-contained, have exclusive use of a kitchen or space within a shared kitchen for each household.
- B Planning applications for the change of use from an HMO to self-contained accommodation will only be considered in the following circumstances:
- a Where the property does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; or
  - b Where the property is in a Growth Area or Area or Change and is not registered.

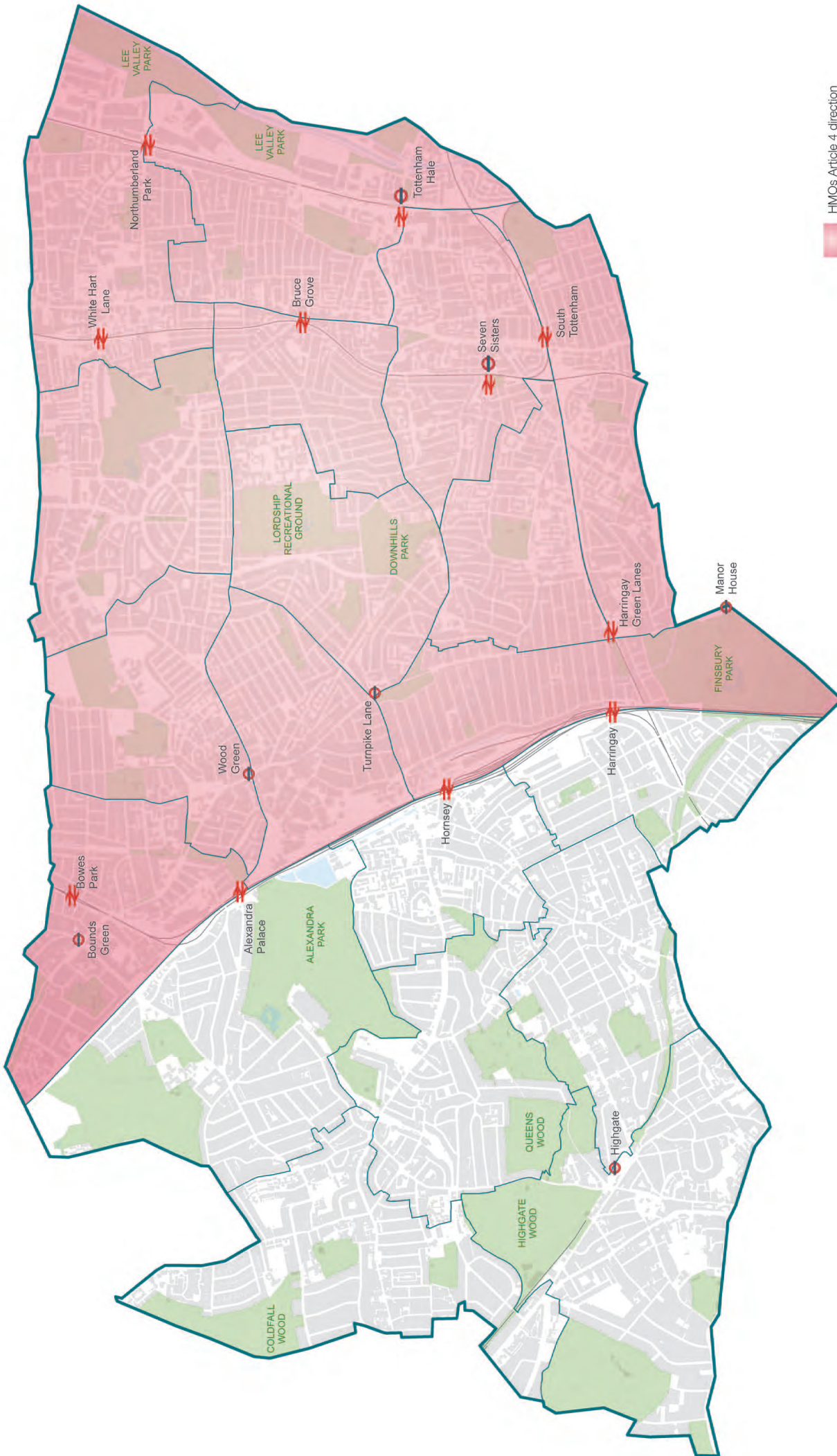
**3.38** The Borough contains approximately 10,000 private sector HMOs. HMO accommodation plays an important role in meeting particular housing needs, especially for low income residents, young people and those needing temporary accommodation. However, many HMOs in Haringey provide sub-standard living conditions, are clustered in areas resulting in adverse impacts on local character and amenity, and also reduce the availability of smaller family housing, for which there is significant need.

**3.39** In response to the many problems associated with poor quality HMOs in the Borough, an Article 4 Direction was introduced in November 2013, which removed permitted development rights for conversion to small HMOs (3-6 unrelated people) within the east of the Borough as shown on Figure 3.2. The Article 4 Direction requires those wishing to change a single dwelling unit (C4 Use Class) to a small HMO (C3 Use Class) within this area of the Borough to apply for planning permission. Therefore the acceptability of proposals for HMOs of six or more people anywhere in the Borough, as well as proposals for smaller HMOs within the east of the Borough, are required to be assessed against the above policy criteria.

**3.40** There are two planning use classes for HMOs. A Use Class C4 HMO is one that is not used by more than six people. A HMO larger than this is classed as a sui generis use. It is permitted to change a Class C4 HMO property to a Class C3 dwelling house without planning permission. Equally it is permitted to change from a Class C3 dwelling house to Class C4 HMO property without planning permission. Converting dwellings to HMO, when classed as sui generis will require planning permission. Likewise a conversion from a HMO to flats will require planning permission. In order to maintain choice and affordability the Council will apply Policy DM11 to ensure the loss of good quality HMO accommodation in the most sustainable locations is managed.



Fortis Green



**FIGURE 3.2** Houses in Multiple Occupation Article 4 Direction Area

## POLICY DM18: RESIDENTIAL BASEMENT DEVELOPMENT AND LIGHT WELLS

- A Householder extensions to existing basements or the construction of new basements in existing dwellings will only be permitted where it can be demonstrated that the proposal:
- a Will not adversely affect the structural stability of the application building, neighbouring buildings and other infrastructure, including the adjoining highway, having regard to local geological conditions;
  - b Does not increase flood risk to the property and nearby properties from any source;
  - c Avoids harm to the appearance or setting of the property or the established character of the surrounding area;
  - d Will not adversely impact the amenity of adjoining properties by reason of noise or increased levels of internal or external activity;
  - e Will not adversely impact the local natural and historic environment;

And, where the proposed basement extends beneath the garden area:

- f Will not cause loss, damage or long-term threat to trees of townscape or amenity value;
- g Maintains adequate soil depth satisfactory for preservation of landscaping consistent with neighbouring properties;

And during the construction phase:

- h Will not cause harm to pedestrian, cycle, vehicular and road safety, adversely affect bus or other transport operations, significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working or visiting nearby; and
  - i Will minimise construction impacts such as noise, vibration and dust for the duration of the works.
- B The Council will not permit basements which include habitable rooms or other sensitive uses in areas prone to flooding and where there is no satisfactory means of escape.
- C In determining applications for light wells, the Council will consider whether:
- a The architectural character of the building is protected;
  - b The character and appearance of the surrounding area is harmed; and
  - c The development results in the loss of more than 50% of the front garden or amenity area.



Highpoint 2, Highgate

- 3.41** Development of basements, particularly in established residential areas, has become an increasingly popular way of gaining additional space in homes. Like other authorities across London, Haringey has experienced an increase in the number of applications received for basement development in recent years.
- 3.42** It is important that basement development is carried out in a way that does not harm the amenity of neighbours, compromise the structural stability of adjoining properties, increase flood risk or damage the character of the area or natural environments.
- 3.43** Some development falls within the scope of permitted development. However, where control can be exercised by the local planning authority, the Council will seek to appropriately manage adverse impacts. Where appropriate, applicants will need to submit specific information to demonstrate that these issues can and have been addressed.
- 3.44** This information should be contained in a Basement Impact Assessment (BIA) to be submitted as part of the planning application. The requirements and stages of the BIA will be set out in full detail in the Council's emerging guidance note on Basement Impact Assessments. The various stages of a BIA should be carried out by qualified and recognised independent assessors and will be paid for by the applicant.
- 3.45** The introduction of light wells where they are not an established and positive feature of the streetscape can harm the character or appearance of an area. Where external visible elements are allowed they need to be located and sensitively designed to avoid light pollution to neighbours and harm to the existing character and appearance of the building, streetscape and gardens in the vicinity.

# Environmental Sustainability

CHAPTER

# 04

## Introduction

- 4.1 Haringey's Strategic Policies Local Plan broadly sets out the Council's approach to protecting and improving its open space and other biodiversity assets. The policies in the following section give effect to the Strategic Policies and ensure the appropriate level of protection for Haringey's open and green spaces.
- 4.2 Additionally, the section sets out how the Council expects new development to contribute to enhancing provision of and access to open and green spaces, particularly in areas of identified deficiency. It also describes how the Council intends to facilitate linking of the Borough's open and green spaces, to strengthen the network of green infrastructure for the benefit of the environment and local communities.
- 4.3 The London Plan and the Strategic Policies Local Plan respond to the issue of climate change, both through promoting mitigation and adaptation measures. The Plans seek to ensure that new development incorporates the latest sustainable design and construction methods, particularly to improve the energy performance of buildings and reduce carbon emissions, as well as to reduce and mitigate flood risk.
- 4.4 This section sets out further detailed requirements to guide proposals for new development, helping to ensure that they are built to the highest environmental standards, fully optimise opportunities for more sustainable energy provision, and proactively respond to flood and water management (including drainage) needs in Haringey's highly urbanised setting.
- 4.5 This section also includes environmental protection policies including for the management of air quality, noise and light pollution, contaminated land and hazardous substances.

## Nature Conservation and Open Space

### POLICY DM19: NATURE CONSERVATION

- A Development proposals on sites which are, or are adjacent to, internationally designated sites, Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation or Ecological Corridors, should protect and enhance the nature conservation value of the site.
  - B Development that has a direct or indirect adverse impact upon important ecological assets, either individually or in combination with other development, will only be permitted where:
    - a The harm cannot be reasonably avoided; and
    - b It has been suitably demonstrated that appropriate mitigation can address the harm caused.
- 4.6 London Plan Policy 7.19 gives effect to the London-wide Biodiversity Action Plan and seeks to ensure that boroughs and other stakeholders take a proactive approach to the protection, enhancement and management of biodiversity. Policy SP13 sets out how the Council will assist in delivering these regional objectives having particular regard to Haringey's Biodiversity Action Plan and the Greenest Borough Strategy. This policy sets out further detailed requirements to support implementation of Policy SP13.
- 4.7 The Council will seek to ensure that development over the plan period both safeguards and improves biodiversity across the Borough, including on designated nature conservation sites and other sites of ecologic importance. Whilst no internationally designated sites<sup>6</sup> are located within the Borough, there are several within a 10km radius of its boundary and therefore merit consideration on development proposals. Other designated nature conservation sites, including Sites of Special Scientific Interest, Local Nature Reserves, Sites of Importance for Nature Conservation and Ecological Corridors are provided various levels of protection under the London Plan and legislation including Wildlife and Countryside Act 1991 and National Parks and Access to the Countryside Act 1949.
- 4.8 The aim of this policy is to ensure that nature conservation is fully considered as part of the site selection, design and development process. In addition to safeguarding the conservation value of designated and other important ecological sites, proposals should seek opportunities to enhance biodiversity wherever possible, such as through appropriate landscaping. Sites in close proximity to SPAs and Ramsar sites should be designed so as not to cause visual or acoustic disturbance to the designated site during the development's operational phase.

<sup>6</sup> Designated under European Union Council Directive on the conservation of wild birds (79/409/ EEC) 1992, European Union Council Directive on the conservation of natural habitats and of wild fauna and flora (92/43/EEC) 1992 and Ramsar Convention on wetlands of international importance.



- 4.9** In line with principles set out in national planning policy<sup>7</sup>, if significant harm resulting from a development cannot be avoided the Council will seek appropriate mitigation measures to address the effects of development on nature conservation. This could include biodiversity offsetting or other measures to support implementation of Haringey's Biodiversity Action Plan, to be secured through planning obligations or planning conditions. Any mitigation will need to be agreed by the Council and applicants will be expected to demonstrate why such mitigation measures are necessary.
- 4.10** The Council will seek to ensure that construction activities within close proximity to nature conservation sites, particularly SPAs and Ramsar sites, are appropriately managed. The Council will give due consideration to the timing of works (outside of wintering bird season, which is November to February) and may require acoustic and visual screening if works are to be undertaken between November and February.

## **POLICY DM20: OPEN SPACE AND GREEN GRID**

- A** Open Space is protected from inappropriate development by Policy SP13. The Council will not grant planning permission for proposals for development that would result in the loss of open space, unless an assessment has been undertaken which shows that the open space is surplus to requirement for use as an open space.
- B** The reconfiguration of open space will be supported where:
- a It is part of a comprehensive, deliverable scheme;
  - b There would be no net loss of open space;
  - c It would achieve enhancements to address identified deficiencies in the capacity, quality and accessibility of open space, and it would secure a viable future for the open space; and
  - d It would not be detrimental to any environmental function performed by the existing open space.
- C** The Council will require all development providing new or replacement open space, wherever possible, to connect to the All London Green Grid. Protection and enhancement of this network will make a positive contribution to Haringey and its communities, in addition to providing social, recreational and ecological benefits.
- D** Proposals for ancillary development on open space will be supported where they:

- a Are necessary for, or would facilitate, the proper functioning of the open space;
  - b Would not be detrimental to any other functions of the open space;
  - c Are ancillary to the use(s) of the open space;
  - d Are of an appropriate scale;
  - e Do not detract from the open character of the site or surroundings; and
  - f Contribute positively to the setting and quality of the open space.
- E** The Council supports the provision and improvement of outdoor leisure facilities. Ancillary developments which enhance the park and open space offer (such as refreshment facilities, market and event spaces, public conveniences, public art installations or outdoor play and fitness equipment), or those which meet the special needs of education, will be permitted, provided that they:
- a Are of a high standard of design and quality, safe and accessible to all;
  - b Do not detrimentally impact on nature conservation and biodiversity;
  - c Do not adversely detract from the overall function, amenity, character and appearance of the park or open space..
- F** Development adjacent to open space should seek to protect and enhance the value and visual character of the open land.
- G** Sites over 1Ha in size which are located in identified areas of open space deficiency should seek to create new publically accessible open space on the site, subject to viability.
- H** Consideration will be given to designating Local Green Spaces in line with national planning guidance.

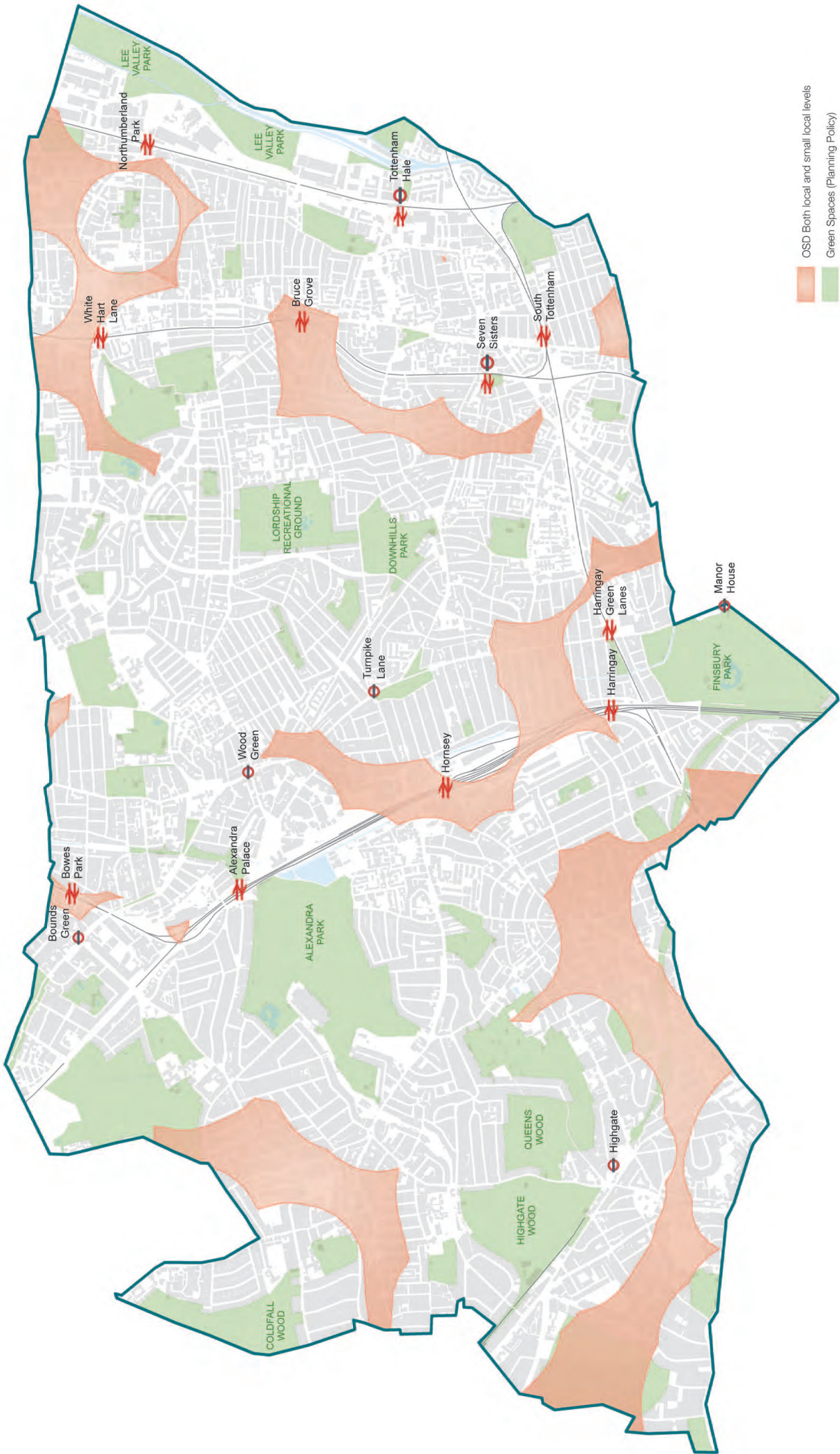
**4.11** Planning policy at all levels recognises the importance of open space to supporting sustainable development. High quality open space can make an important contribution to the health and well-being of communities. The NPPF provides that planning policies must be based on robust and up to date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.

**4.12** Haringey's Open Space and Biodiversity Study (2013) provides an assessment of the quantity, quality and value of the open space and SINCs in the Borough. It provides evidence to support the above policy and includes locally derived standards for the provision of open space in the Borough. These standards form the basis for redressing the quantitative and qualitative deficiencies through the planning process. The study sets in context the wider biodiversity and green infrastructure network.

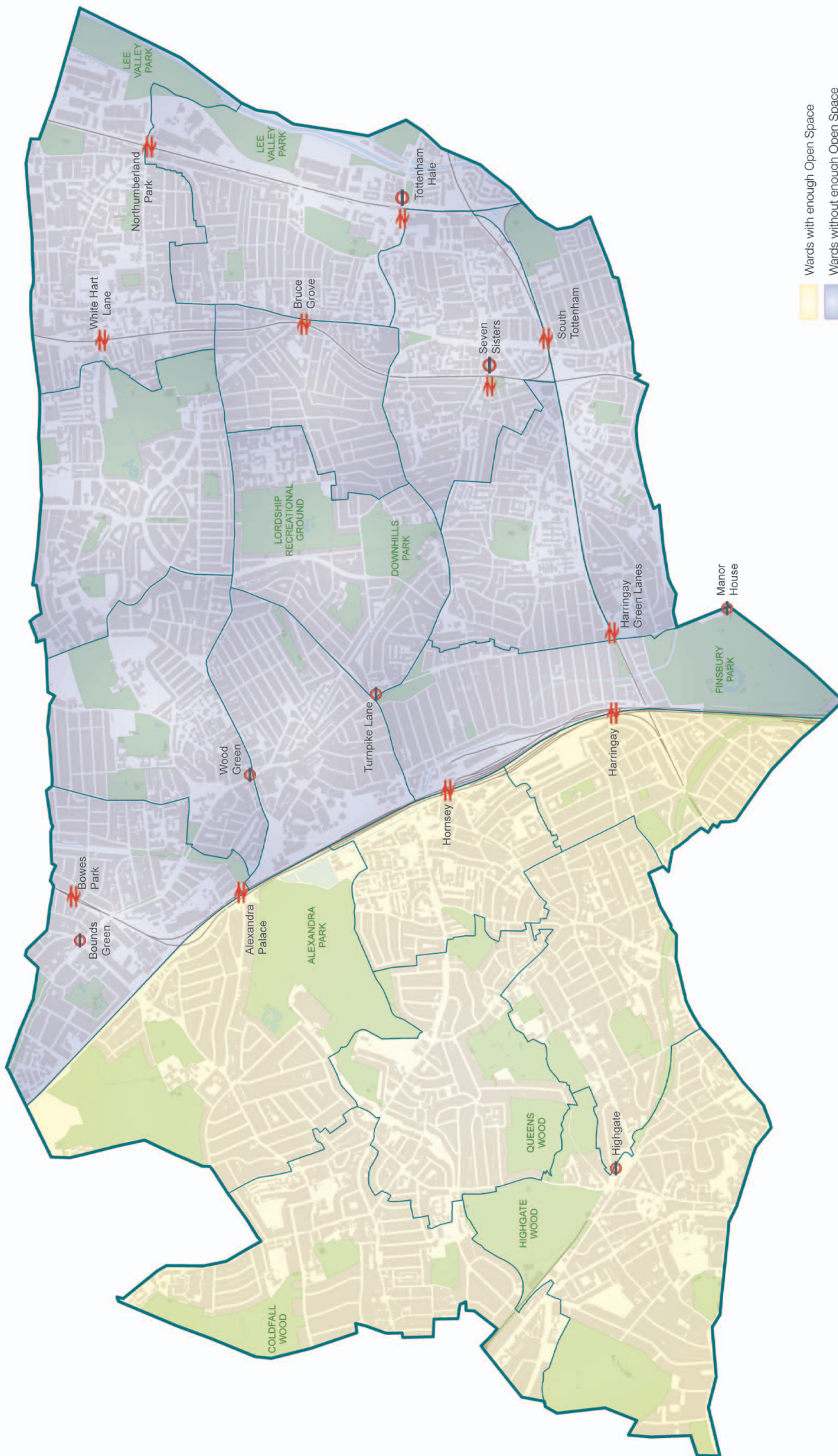
<sup>7</sup> National Planning Policy Framework, paragraph 118.

FIGURE 4.1

Areas of Open Space Deficiency



- OSD Both local and small local levels
- Green Spaces (Planning Policy)



**FIGURE 4.2** Wards of Open Space Deficiency

- 4.13** In line with London Plan policies 7.16-7.22, Local Plan Policy SP13 sets out that the Council will protect and enhance the Borough's existing Green Belt, Metropolitan Open Land, designated Open Spaces, Green Chains, allotments, river corridors and other open spaces.
- 4.14** Haringey has some excellent open spaces, including parts of the Lee Valley Regional Park, Alexandra Palace Park, Finsbury Park, and Highgate Wood. Haringey also boasts many less famous open spaces, including parkland, playgrounds, playing fields, amenity green spaces and water areas, and habitats/natural areas.
- 4.15** The population in Haringey is projected to increase by approximately 75,000 people between 2015-2035. The additional population will place pressure on local services, including open spaces. In this context, it is important that the Council prioritises the protection and enhancement of the Borough's open spaces, as well as improving public access to them. Figure 4.3 shows the existing and proposed Green Grid in Haringey, including possible links to other points of interest in the Borough such as cultural quarters and town centres.
- 4.16** Haringey's network of open spaces should be regarded as integral infrastructure which will contribute to the 'London wide Green Grid', and the quality of the overall environment as advocated in the All London Green Grid (ALGG) SPG. The network forms part of Haringey's character and has a vital role in the well-being of communities.
- 4.17** Local open spaces are also integral to the Borough's environmental well-being. They support habitats and biodiversity, help mitigate air, light and noise pollution, counter the urban heat island effect and provide visual relief in the landscape. Open spaces are also hugely important in flood risk and drainage management.

## Reconfiguration

- 4.18** The reconfiguration of land identified as open space can be an effective approach to addressing identified deficiencies, overcoming functional issues as part of re-provision and may provide windfall opportunities as part of the Borough's Green Grid. The Council will therefore give consideration to proposals that provide demonstrable improvements in the functional value, accessibility to and public use of open space through its reconfiguration. Proposals will need to be shown to form part of a deliverable, comprehensive development scheme where open space requirements have been positively considered.
- 4.19** The approach supports Policy SP13 in seeking to deliver sustainable development through provision of high quality, well designed and appropriately maintained open spaces that are accessible, safe and which help to support biodiversity.

## Ancillary development

- 4.20** Ancillary facilities can positively contribute to the value of green and open spaces, enhancing the potential for public use and enjoyment of those spaces, particularly where they support social and community infrastructure that meets local need.
- 4.21** Insensitive design and siting of facilities can detract from the character of open space, adversely impact on the environmental functions it performs and place limitations on the range of uses possible on open space. The Council will therefore seek to ensure that any proposals for ancillary facilities are appropriate to their location, having regard to the Haringey Development Charter (see DM1), and do not compromise the value and the function that open space can perform.

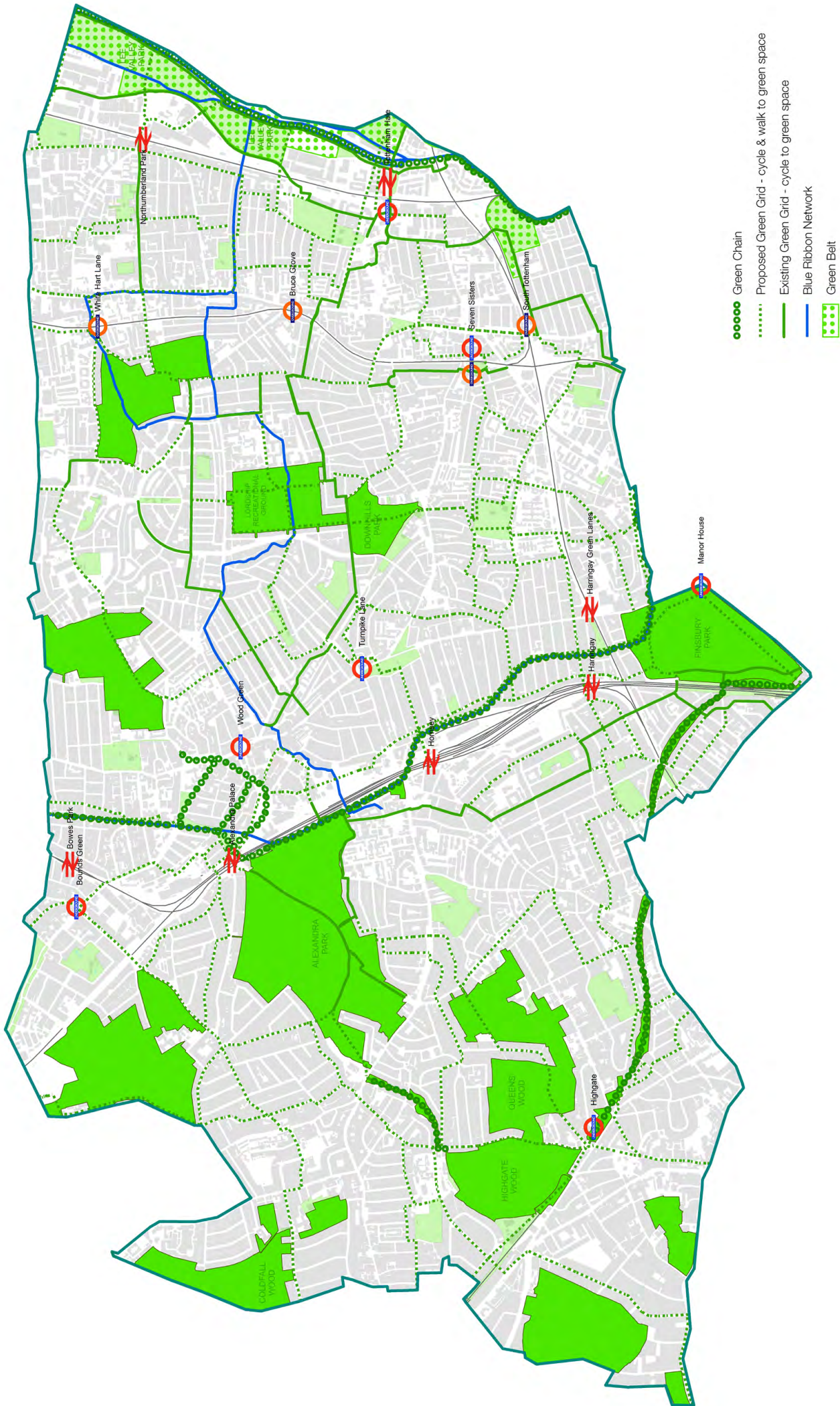
## Responding to Climate Change






- 4.22** Climate change is one of the key challenges facing London, the UK and the wider global community. There is mounting evidence of its seriousness and potential long term impacts. The National Planning Policy Framework sets out that planning has a key role to play in meeting the challenge of climate change.<sup>8</sup> It can help to shape places to secure significant reductions in greenhouse gas emissions, minimise vulnerability and provide resilience to climate change and support the delivery of low carbon energy infrastructure.
- 4.23** The London Plan seeks to achieve an overall reduction in the region's carbon dioxide emissions of 60 percent (below 1990 levels) by 2025. All London boroughs are expected to contribute to meeting this strategic carbon reduction target. Haringey's Strategic Policies Local Plan aims to deliver the Borough's spatial strategy in a way that facilitates a step change towards low and zero carbon development. The plan supports the Council's Greenest Borough Strategy and commitment to achieving a local carbon dioxide reduction target.<sup>9</sup> Progress has been made in respect of these strategic and local targets<sup>10</sup> and it is important that opportunities to maintain this momentum are fully exploited.
- 4.24** The London Plan sets requirements for new major development proposals including for carbon dioxide reduction, sustainable design, decentralised energy systems and renewable energy generation. The Council considers that smaller developments also have a role in responding to climate change and should, in particular, contribute to minimising carbon dioxide emissions wherever possible. The following policies therefore give effect to the selected London Plan policies for non-major development proposals in Haringey.

<sup>8</sup> National Planning Policy Framework (2012), paragraph 93.

<sup>9</sup> In October 2009, the Council adopted an aspirational target to reduce Borough-wide carbon emissions by 40% by 2020 (below 2005 levels) through the Haringey 40:20 Programme.

<sup>10</sup> Haringey Fourth Annual Carbon Report (2014).



-  Green Chain
-  Proposed Green Grid - cycle & walk to green space
-  Existing Green Grid - cycle to green space
-  Blue Ribbon Network
-  Green Belt

## POLICY DM21: SUSTAINABLE DESIGN, LAYOUT AND CONSTRUCTION

- A All new development, including building and landscape works, will be expected to consider and implement sustainable design, layout and construction techniques. Proposals should:
- Apply the energy hierarchy to minimise energy use in order to meet, and if possible exceed, minimum carbon dioxide reduction requirements;
  - Apply the cooling hierarchy to reduce the potential for overheating and limit reliance on mechanical air conditioning systems;
  - Maximise opportunities to enhance biodiversity on-site, including through appropriate landscaping, Sustainable Drainage Systems, living roofs and green walls
  - Wherever possible, use building materials with high environmental performance ratings; and
  - Seek opportunities for locally sourced labour.
- B The Council will support appropriate measures to sustainably retrofit existing homes and non-residential buildings.
- C Proposals that fail to demonstrate adequate consideration for sustainable design, layout and construction techniques will be resisted.
- D Consideration will be given to the use of carbon offset payments, to be secured by planning obligations, where it can be demonstrated that proposals are unable to meet carbon dioxide emission reduction targets on-site.

- 4.25 The principles of sustainable design, layout and construction are set out in London Plan Policy 5.3. The principles cut across a number of policies in this Local Plan and all proposals should positively respond to them by engaging with the Haringey Development Charter (see Policy DM1). The application of sustainable design principles can help to improve the environmental performance of buildings, making them more resilient to climate change and mitigating their effect on it. Sustainable design and construction therefore provides clear environmental advantages. It also offers social and economic benefits. This includes more efficient buildings with cheaper operating costs, which is of benefit to future owners or occupiers and particularly those at risk of fuel poverty.

- 4.26 The London Plan requirements for major development may not be fully financially viable or technically feasible for minor and household development. Much will depend on individual site circumstances and the nature and scale of development proposed. However, the Council is mindful of the cumulative impact of development in the Borough and will therefore seek to ensure that all proposals adequately investigate and deliver opportunities for incorporating sustainable design, layout and construction principles wherever possible. Consideration should be made at the very early stage in the design process to ensure maximum use and benefit.
- 4.27 For assistance with implementation of this policy applicants are encouraged to refer to Haringey's Sustainable Design and Construction Supplementary Planning Document and other relevant London Plan guidance.

### Energy efficiency

- 4.28 London Plan Policy 5.2 states that development proposals should make the fullest contribution to minimising carbon dioxide emissions in accordance with the energy hierarchy, as follows:
- Be lean: use less energy
  - Be clean: supply energy efficiently
  - Be green: use renewable energy
- 4.29 The first step in the hierarchy should be met through adopting sustainable design principles. The second step should be met by prioritising decentralised energy, for which local requirements are set out below (see Policy DM22). The third step is to use renewable energy.
- 4.30 London Plan Policy 5.2 requires reductions in regulated CO<sub>2</sub> emissions over the 2010 Building Regulations (Part L) with a graduated tightening of standards to achieve zero carbon by 2016 to residential buildings and 2019 for non-domestic buildings. The policy reflects the Government's previous intention to introduce a step-change in the national Building Regulations. However, the Summer Budget 2015 states that the Government will not progress with the proposed 2016 increase in on-site energy efficiency standards, but keep these under review.<sup>11</sup> The Council will continue to monitor changes in higher level policy and ensure proposals meet the appropriate minimum required reduction in carbon emissions on-site by prioritising use of the energy hierarchy.

<sup>11</sup> Fixing the Foundations: Creating a More Prosperous Nation. Department for Business Innovation and Skills. 2015.

## Overheating and cooling

- 4.31** Development proposals should seek to integrate the cooling hierarchy in accordance with sustainable design, layout and construction principles. This will help to ensure that buildings are better equipped to manage their cooling needs in energy efficient ways over their lifetime. This policy applies the cooling hierarchy set out in the London Plan:
- 1 Minimise internal heat generation through energy efficient design
  - 2 Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls
  - 3 Manage the heat within the building through exposed internal thermal mass and high ceilings
  - 4 Passive ventilation
  - 5 Mechanical ventilation
  - 6 Active cooling systems (ensuring they are lowest carbon options)
- 4.32** Measures at the highest priority level of the cooling hierarchy should be applied to the fullest extent possible before relevant measures at the next level are considered.
- 4.33** Applicants will be expected to undertake dynamic thermal modelling to ensure that the development does not overheat. This is particularly important for south facing dwellings, top floor living accommodation and development proposed for users that are more susceptible from overheating risk (elderly, long term sick, young children). The GLA has developed with the Chartered Institute of Building Services Engineers (CIBSE) guidance for developers to address the risk of overheating in buildings. This document is titled 'TM49: Probabilistic design summer years for London'. This dynamic modelling should address future temperatures likely to be experienced over the lifetime of the development. Alongside this model applicants should submit evidence showing how the principles of the cooling hierarchy have influenced the design.

## Sustainable retrofitting

- 4.34** Existing building stock in Haringey factors significantly in local carbon emissions. The Borough's interactive heat loss map<sup>12</sup> indicates that many residential properties are energy inefficient. Sustainable retrofitting offers an opportunity to improve the environmental performance of existing buildings particularly where conversions, refurbishments, changes of use and extensions are proposed.
- 4.35** This policy seeks to encourage proposals for minor and householder development to incorporate energy efficient measures (such as internal roof, floor and wall insulation) as a cost-effective way to reduce carbon

emissions. External wall insulation is also supported in principle although any such treatment must be sympathetic to character and historic significance of the existing building and surrounding area, having regard to other Local Plan policies, particularly Policies DM1 and DM9. The use of energy efficient appliances is also strongly recommended as a simple way to reduce energy use and carbon emissions.

## Enhancing biodiversity

- 4.36** Urban greening can make an important contribution not only to biodiversity and amenity but also to climate change adaptation. Living roofs (green and brown roofs) and green walls offer many environmental benefits such as improving the thermal performance of buildings, reducing on-site energy demands and limiting the 'urban heat island' effect. They also contribute to sustainable drainage by absorbing rainfall, reducing run-off and improving water quality.
- 4.37** The Council will strongly encourage the incorporation of urban greening measures where vertical surfaces face public spaces, particularly to enhance the visual appearance of buildings and improve public amenity. However, it is recognised that living roofs and walls may not be appropriate in certain settings, such as Conservation Areas, and the policy will be applied subject to individual site circumstances. Applicants are encouraged to refer the GRO Green Roof Code (2014) which is accepted good practice guidance.

## Materials and locally sourced labour

- 4.38** The type and source of materials used for the construction of buildings has a major impact on sustainability. It is now common for building materials and their components to be assessed in terms of their environmental impact across their entire life cycle, including through energy ratings. The Council encourages applicants to use materials with high environmental performance ratings wherever possible.
- 4.39** The use of locally sourced labour has many benefits, including support for the local economy through provision of local jobs and limiting environmental impacts by reducing travel distance and promoting sustainable travel modes.

## Carbon Offsetting

- 4.40** The London Plan currently provides that boroughs may establish carbon offsetting arrangements in order to maximise carbon emission reductions. Subject to Government and regional policy, the Council will give consideration to the use of carbon offsetting payments where it can be suitably demonstrated that proposals are unable to meet carbon emissions reductions targets on-site. Further details in this regard are set out in the Council's Planning Obligations SPD. Carbon costing will be established using a recognised price of carbon in line with London Plan supplementary planning guidance, or further local guidance as appropriate.

<sup>12</sup> London Heat Map.

## POLICY DM22: DECENTRALISED ENERGY

- A Subject to other policy requirements, proposals that contribute to the provision and use of Decentralised Energy network infrastructure will be supported.
- B Communal energy systems
  - a All major development should incorporate site-wide communal energy systems that serve all energy demands within the development from a common system, irrespective of whether it is connected to a DE network.
  - b All development that incorporates site-wide communal energy systems should optimise opportunities for extending such systems beyond the site boundary to supply energy to neighbouring existing and planned future developments.
- C Existing and planned future DE networks
  - a All development proposals should prioritise connection to existing or planned future DE networks.
  - b All major development located within 500 metres of an existing DE network, and minor new-build development located within 25 metres, will be expected to secure connection to that network.
  - c All major development located within 500 metres of a planned future DE network, which is considered by the Council likely to be operational within 3 years of a grant of planning permission, will be expected to secure connection to that network.
  - d Where connection to an existing or planned future DE network is expected, applicants must submit a feasibility assessment so the Council can determine whether a connection is technically feasible and financially viable.
- D DE network 'connection zones'
  - a All major development located within 500 metres of a DE network 'connection zone' should be designed for connection to a DE network.
  - b All minor new-build development located within 25 metres of a DE network 'connection zone' should be designed for connection to a DE network.
- E Customer charters
  - a Where site-wide communal and district heating systems are operational, the Council will strongly encourage heat and energy service providers to enter into customer charters with domestic and micro-business customers.

- 4.41 Decentralised Energy is supported by both national and regional policy as a means of meeting requirements of the Climate Change Act on carbon emission reduction. The London Plan includes a target for 25% of heat and power used in London to be generated through the use of localised DE systems by 2025.
- 4.42 Policy SP4 broadly supports DE networks as part of a package of measures to assist in delivering more energy efficient development and working towards a low carbon Borough. This policy sets further detailed requirements to assist with implementation of these strategic objectives. In line with the London Plan, all development proposals will be expected to select energy systems in accordance with the Mayor's energy hierarchy.
- 4.43 All major development should incorporate site-wide communal energy systems that serve all energy demands within the development from a common system, irrespective of whether it is connected to a DE network. Proposals should give consideration to systems that connect different uses and/or groups of buildings, both within and extending beyond the development site.
- 4.44 New development should have the ability to connect to DE networks where reasonably possible. This will ensure that the opportunities and benefits of using DE networks are fully maximised now and in future years. Whilst a DE network may not be in place at the time of a development's construction, it is important that the development is readily able to connect to such a network if or when it becomes available.
- 4.45 In locations of existing or planned future DE networks, the Council will expect applicants to fully investigate the feasibility of network connections and other opportunities for increasing DE network access, including through infrastructure upgrades and network expansion. The Council has commissioned an Energy Masterplan for Haringey that identifies key opportunities for DE network development. It has informed the distance thresholds for existing or planned future DE networks where connection is expected.
- 4.46 Where connections to DE networks are expected, applicants must submit a feasibility assessment so that the Council can determine whether connection is feasible. In this area of policy, feasibility includes considerations of technical feasibility and financial viability. There are recognised ways of assessing these aspects of deliverability. This will ensure that requirements are not imposed on developers that could lead to uneconomic costs on occupiers.



- 4.47** Feasibility assessments should be prepared on a whole life cost basis in line with the Mayor's relevant guidance on preparing energy assessments, having further regard to Council's most recent technical evidence on DE network development. The assessment should be provided on submission of the application. Haringey's Sustainable Design and Construction SPD set out the level of information required at each stage of the planning application process.
- 4.48** Where connection to an existing or planned future DE network is considered to be feasible, the Council will seek a commitment to connect by way of planning condition or a legal agreement. Development proposals required to connect to a planned future DE network must clearly demonstrate how the required carbon reduction targets will be met. For planned future networks, a short term 'grace period' of five years may be permitted in which the development would be exempt from providing on-site renewable energy or CHP, so long as the minimum standards of Part L of the building regulations are met. This approach will provide that the Council is in a position to reserve judgement on whether a proposed development is 'connection ready', whilst ensuring that applicants are spared unnecessary expenditure on alternative technologies which could become a financial barrier to connection later on. Applicants will be expected to fully consider appropriate alternative approaches to be implemented should the planned future DE network not come forward. Should the planned future network not come forward, applicants will be expected to implement an alternative energy strategy to meet the target in place at the time of the planning approval.
- 4.49** Where the feasibility assessment indicates it is not possible to connect to an existing or planned future DE network, major development should fully investigate opportunities to make provision for site-wide communal energy systems, in line with London Plan policy. This includes consideration for systems that connect different uses and/or groups of buildings, both within and extending beyond the site.
- 4.50** The Strategic Policies Local Plan (Figure 4.1) identifies and maps potential DE network hubs across the Borough. An Energy Masterplan has now been prepared and updates this map (see Figure 4.4 below), taking account of revised growth projections for Haringey. This latest map sets out more detailed information on DE network 'connection zones'. Recognising the potential these areas have for facilitating DE systems the Council expects that new major development located within 500 metres of a 'connection zone', and new minor new-build development within 25 metres, will be designed for connection to a DE network. Development should be designed to both enable connection and maximise the efficiency of the connection in terms of energy flows.

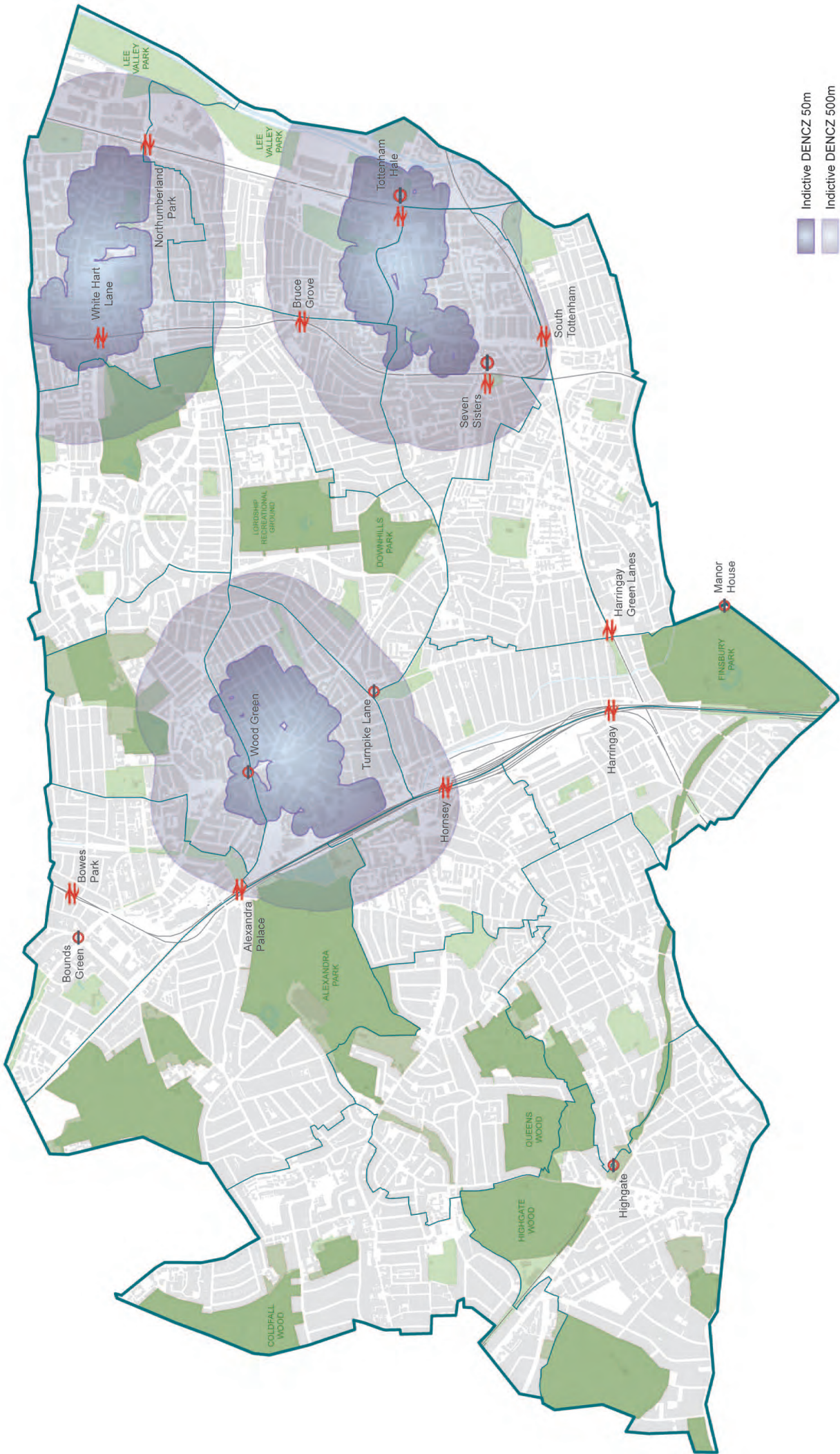


Green Space

- 4.51** Haringey's DE 'connection zones' may be updated over time to reflect the latest available heat mapping evidence and to ensure that DEN opportunities facilitated by new development are fully maximised.
- 4.52** The Council will assess development proposals having regard to the technical design and construction principles and district heating standards set out in the Mayor's 'London Heat Network Manual' or any such equivalent guidance that may supersede it. This includes design principles for secondary side heating and cooling systems.
- 4.53** Further detailed requirements for DE network development, particularly for specific strategic sites essential to the delivery of Haringey's spatial strategy, may be set out in other Local Plans including Site Allocations and Area Action Plans.
- 4.54** The Council may in the future investigate the potential for using Community Infrastructure Levy funding to support the development of strategic DE network infrastructure.
- 4.55** It is important that consumers are appropriately protected in respect of heat and energy service, particularly where households or businesses are reliant on communal or district heating and energy systems. The Council therefore strongly encourages the use of customer charters or publically available right of challenge in a fair and independent way, to ensure clarity of expectation on service standards, including for system maintenance and end user pricing. Such charters and ombudsman can be of key benefit to more vulnerable customers (for example, those in or at risk of fuel poverty). The district heating industry has recently engaged with consumer representatives to establish the Heat Trust. This emerging scheme could establish common standards across the UK. In the interim, the Association for Decentralised Energy (ADE) has published a standardised heat customer charter which the Council considers is good practice guidance for service providers. The Chartered Institution of Building Services Engineers (CIBSE) and the ADE have also produced a joint Code of Practice for Heat Networks in the UK.

FIGURE 4.4

Indicative Decentralised Energy “Connection Zones”



Indicative DENCZ 50m  
Indicative DENCZ 500m

## POLICY DM23: ENVIRONMENTAL PROTECTION

### Air Quality

- A All development proposals should consider air quality and be designed to:
  - a Improve or mitigate the impact on air quality in the Borough; and
  - b Improve or mitigate the impact on air quality for the occupiers of the building or users of the development.
- B Air quality assessments will be required for all major development and other development proposals, where appropriate.
- C Where adequate mitigation is not provided planning permission will be refused.

### Noise and Vibration

- D The Council will seek to ensure that new noise sensitive development is located away from existing or planned sources of noise pollution. Potentially noisy developments may be refused if it cannot be suitably demonstrated that measures will be implemented to mitigate its impact.
- E A noise assessment will be required to be submitted if the proposed development is a noise sensitive development, or an activity with the potential to generate noise.

### Light Pollution

- F Development proposals that include external lighting must mitigate potential adverse impacts from such lighting. Where appropriate, proposals will be required to submit details demonstrating that external lighting is:
  - a Appropriate for its purpose in its setting;
  - b Designed to minimise and provide protection from glare and light spillage, particularly to sensitive receptors such as residential properties and natural habitats, including watercourses; and
  - c Energy efficient.

### Contaminated Land

- G Proposals for new development will only be permitted where it is demonstrated that any risks associated with land contamination, including to human health and the environment, can be adequately addressed in order to make the development safe.

- H All proposals for new development on land which is known to be contaminated, or potentially contaminated, will be required to submit a preliminary assessment to identify the level and risk of contamination and, where appropriate, a risk management and remediation strategy.

### Hazardous Substances

- I Proposals for development of new hazardous installations, or development of sites located within the vicinity of existing installations, will only be permitted where it is demonstrated that necessary safeguards are incorporated to ensure the development is safe.

## Air Quality

- 4.56 Poor air quality is a public health issue that is linked to the development of chronic diseases. National planning policy and guidance seeks to promote sustainable communities and sets out that local authorities should consider how to manage air quality in their area, such as by ensuring that new development contributes to reducing or mitigating air pollution and the population's exposure to it.
- 4.57 The whole of Haringey is a designated Air Quality Management Area (AQMA) for the pollutants nitrogen dioxide (NO<sub>2</sub>) and particulate matter (PM<sub>10</sub>). Haringey's Air Quality Progress Report (2012) sets out evidence which confirms the need to maintain the AQMA designation. The Council's Air Quality Action Plan (2011) identifies actions and mitigating measures necessary to help meet national air quality objectives for NO<sub>2</sub>, PM<sub>10</sub> and other pollutants. It reflects the Government's Air Quality Strategy as well as the Mayor's Air Quality Strategy.
- 4.58 As Haringey is an AQMA it is expected that proposals for new development will consider air quality in the design, construction and operation of the development over its lifetime. This includes consideration of adverse impacts on potential site occupiers as well on the wider local area. Some types of uses are very sensitive to air pollution (such as schools, hospitals and residential uses, particularly those for elderly people) and this should be considered by developers in the site selection process.
- 4.59 The GLA and London Council's Best Practice Guidance on 'The Control of Dust and Emissions from Construction and Demolition' should be referred until such time it is replaced by equivalent guidance, such as the proposed London Plan supplementary guidance.

## Noise and vibration

- 4.60** Noise pollution can adversely impact on the amenity and health of building occupiers as well as the wider public. The Council will seek to ensure that new developments both minimise noise pollution and appropriately manage its impact. Noise sensitive development (such as housing, schools and health facilities) should be located away or appropriately separated from major sources of noise. The Council will expect that mitigation measures are considered and incorporated into the design process prior to the submission of an application.

## Light pollution

- 4.61** Artificial external lighting offers many benefits. It helps to provide a safe environment for a range of activities such as driving, walking and cycling. It extends opportunities for sport and recreation by enabling night time use of facilities. As well, lighting can enhance the visual appearance of buildings and townscapes.
- 4.62** However artificial light is not always necessary and has the potential to become ‘light pollution’ or ‘obtrusive light’, such as when poorly designed fixtures project light where it is not intended or reflect light upwards into the night sky. Apart from energy wastage, which can contribute to climate change and high running costs, lighting can adversely impact on people’s quality of life as well as wildlife. The Council will therefore seek to control the use of external lighting in proposals for new development, including for illuminated signs and advertisements, security and floodlights, decorative lighting and other illuminations.
- 4.63** Details of lighting schemes should be in line with established industry guidance, which is currently set out by the Institute of Lighting Professionals.
- 4.64** This policy is separate from statutory artificial light nuisance controls relevant to the Clean Neighbourhoods and Environment Act 2005 and Environmental Protection Act 1990.

## Contaminated land

- 4.65** Environmental health legislation requires the Council to ensure that land is inspected for contamination and made suitable for current and future uses. The National Planning Policy Framework also provides a role for the planning system in this regard. It stresses the need for policies to ensure that new development is compatible with its location. The NPPF makes clear that developers and landowners are responsible for securing safe development where a site is affected by contamination.
- 4.66** Haringey’s Contaminated Land Strategy (2004)

sets out how the Council will deal with potentially contaminated sites. It also summarises the locations where previous land uses may have led to land contamination. The Council will seek to advise those proposing development on sites with known or potential land contamination issues, or development likely to pose a new risk of contamination, consulting with the Environment Agency in respect of controlled waters, as appropriate.

- 4.67** A preliminary land contamination assessment will be required to identify the nature and extent of contamination. It must suitably demonstrate that potential risks have been identified and assessed, including consideration of previous and existing uses of the site and adjacent land. Where the assessment identifies a significant harmful risk to human health or the environment, the Council will require a risk management and remediation strategy based on a detailed site investigation. The strategy should focus on the most appropriate measures for the site in question, highlighting where risks are not sufficient to warrant remedial action and where remedial intervention measures are necessary. At a minimum, remediation must ensure that the land, after development, is not capable of being determined as contaminated land under Part 2A of the Environmental Protection Act 1990.

## Hazardous substances

- 4.68** Hazardous installations comprise a range of chemical process sites, fuel and chemical storage sites, and pipelines. It is important that any risks associated with the development of hazardous installations, or development near them, are appropriately considered through the planning process.
- 4.69** The Council is a hazardous substance authority and in this role it grants consent for hazardous installations, specifying the nature and quantity of hazardous substances that can be kept at any installation. The Council will consult the Health and Safety Executive (HSE) on all applications for hazardous substances consent. The Council will also take the opportunity to review relevant existing consents granted to ensure they reflect current conditions and the physical capacity of the site.
- 4.70** In considering planning applications the Council must be satisfied that proposals will not constitute a hazard to existing communities or the local environment. The Council will seek the advice of the HSE, Environment Agency and other stakeholders, as appropriate, when considering potential risks. The HSE has defined consultation zones around hazardous installations. Applicants may be required to submit risk assessments to demonstrate that appropriate safeguards will be incorporated into the development. The standing advice published by the Health and Safety Executive should be referred.

## **POLICY DM24: MANAGING AND REDUCING FLOOD RISK**

- A. The Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants and do not increase the risk of flooding.
- B. All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test, where required, have been satisfied. Proposals must be informed by a site specific Flood Risk Assessment (FRA) taking account of all potential sources of flooding and should:
- a Demonstrate the application of a sequential approach for the development of individual sites to ensure that the most vulnerable land uses are located in areas of the site that are at lowest risk of flooding;
  - b Preserve overland flood and flow routes and ensure there is no net loss of flood storage. Adequate flood storage and compensation should be provided on site, or if this is not possible, provided off site where circumstances allow;
  - c Where appropriate, set out the mitigation measures that will be incorporated on site to manage residual flood risk including:
    - i Finished floor levels set no lower than 300mm above the 1 in 100 chance in any given year, including an allowance for climate change, flood level; and
    - ii Ensure safe access and egress for future users of the development or an appropriate emergency evacuation plan.
  - d. Contribute to naturalising watercourses where opportunities arise, in line with Policy DM28 (Watercourses and Flood Defences).
- C All proposals for new development will be required to:
- a Manage and reduce surface water run-off, in line with Policy DM25 (Sustainable Drainage Systems) and Policy DM26 (Critical Drainage Areas);
  - b Manage water and waste water discharges, in line with Policy DM29 (On-site Management of Waste Water and Water Supply).
- D With the exception of water compatible uses and essential infrastructure, development in areas designated in Haringey's Strategic Flood Risk Assessment as being within Flood Zone 3b will not be permitted.
- 4.71** The North London Strategic Flood Risk Assessment (SFRA) Level 1, Haringey's SFRA Level 2 and Surface Water Management Plan (SWMP) provide local evidence of all forms of flooding including fluvial, surface water, groundwater, sewers and reservoirs.
- 4.72** For the purposes of the policies in this section, flood risk areas are defined as Flood Zones 2 and 3 (for fluvial flooding), and areas at risk from other sources of flooding identified in evidence including the SFRA and SWMP.
- 4.73** In line with the National Planning Policy Framework, Policy SP5 sets out that the Council will seek to direct new development to those areas in the Borough which are at lowest risk of flooding. This policy should be read in conjunction with Local Plan policy SP5.
- 4.74** As part of the preparation of the Local Plan, a Sequential Test was carried out to assist in identifying suitable future areas for development within the Borough, including Growth Areas and Areas of Change. Further Sequential Tests were undertaken on sites in the Site Allocations DPD and Tottenham AAP. Allocated sites that have passed the Sequential Test will not need to apply the test again, unless the proposed development is not consistent with the allocated land use.
- 4.75** For those sites which are not included as site allocations, the Council will apply the requirements of the Sequential and Exception Tests contained within the NPPF and associated technical guidance.
- 4.76** In line with national policy, a site specific Flood Risk Assessment is required for proposals of 1 hectare or greater in Flood Zone 1; all proposals for new development (including minor development and change of use) in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has critical drainage problems (as notified to the local planning authority by the Environment Agency); and where proposed development or a change of use to a more vulnerable class may be subject to other sources of flooding.
- 4.77** Applicants should refer the Environment Agency's published standing advice on flood risk when preparing site-specific Flood Risk Assessments.
- 4.78** On passing the Sequential and Exception Tests, a sequential approach should be applied to proposals on a site basis as part of the Flood Risk Assessment. The sequential approach will help to further minimise risk by locating the most vulnerable development types to the least risky areas within a site boundary.

**4.79** Consideration should be given to the design and layout of development. This is particularly important in managing residual flood risks, which are those that remain after the application of the sequential approach and other mitigating measures. Design features may include flood resistant and resilient construction. However, the incorporation of such construction measures will not warrant justification for development in inappropriate locations. In addition, Haringey's Strategic Flood Risk Assessment Level 2 sets out evidence of the flood characteristics in the Borough (including flood depth, velocity, rates of inundation and duration of flooding) which should be referred in the preparation of Flood Risk Assessments.

## **POLICY DM25: SUSTAINABLE DRAINAGE SYSTEMS**

- A** All proposals for new development must seek to manage surface water as close to its source as possible in line with the London Plan drainage hierarchy.
- B** The Council will require Sustainable Drainage Systems (SuDS) to be sensitively incorporated into new development by way of site layout and design, having regard to the following requirements:
  - a** All major development proposals will be required to reduce surface water flows to a greenfield run-off rate for a 1 in 100 year critical storm event;
  - b** All minor development proposals should aim to achieve a greenfield run-off rate and, at a minimum, achieve a 50 per cent reduction on existing site run-off rates;
  - c** All other development should seek to achieve a greenfield run-off rate and include at least one 'at source' SuDS measure resulting in a net improvement in water quantity or quality discharging to a sewer; and
  - d** For all development where a greenfield run-off rate cannot be achieved justification must be provided to demonstrate that the run-off rate has been reduced as much as possible.
- C** Where Sustainable Drainage Systems are implemented they will be expected to:
  - a** Meet the requirements set out in the Council's relevant local standards and guidance, or national standards where agreed;
  - b** Incorporate measures identified in the Surface Water Management Plan;

- c** Be designed to maximise biodiversity and local amenity benefits, and where appropriate, ensure that SuDS techniques provide for clean and safe water at the surface;
  - d** Improve water quality; and
  - e** Function effectively over the lifespan of the development.
- D** Where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations) robust justification must be provided along with proposed alternative sustainable approaches to surface water management.

**4.80** Haringey's Strategic Flood Risk Assessment has identified surface water run-off as the greatest risk to the Borough with regard to flooding. Surface water run-off is the excess water that flows off the land as a result of rainfall that is unable to filter through the soil. Surface water flooding occurs when high intensity or prolonged rainfall generates run-off which flows over the surface of the ground and ponds in low lying areas. It can be especially problematic when the ground is saturated or when the drainage network has insufficient capacity to cope with the additional flow. Climate change is projected to increase the frequency and intensity of heavy rainfall events, placing greater pressure on traditional drainage systems.

**4.81** All development has the potential to increase the risk of surface water flooding. Even smaller developments can contribute to overall run-off when their combined effect is considered, particularly where there are a lack of permeable surfaces. Therefore, in addition to major developments the Council will seek to ensure that proposals for minor, householder and other types of development, including residential and commercial extensions and conversions, contribute to a reduction in the rate of surface water run-off.

**4.82** SuDS are an important tool in managing surface water flood risk. SuDS mimic natural drainage systems and retain water at or near a site when rain falls. This in contrast to conventional drainage approaches, which tend to pipe water off site as quickly as possible. SuDS offer significant advantages over piped drainage systems in terms of reducing the rate and quantity of surface water run-off as well as improving the quality of run-off.

**4.83** As well as managing flood risk and water quality, SuDS can be of added benefit by enhancing biodiversity and amenity through design treatments. Proposals should seek to maximise the value of SuDS by making use of their features, such as green space and clean water at the surface, to improve the value of landscapes and to strengthen sense of place.

- 4.84** The Council is currently preparing local SuDS standards which, once adopted, will assist in the implementation of this policy. Until such time the Council will expect that proposals meet the national non-statutory standards published by the Department for Environment, Food and Rural Affairs. In addition, all SuDS should be designed having regard to Haringey's Sustainable Design and Construction SPD.
- 4.85** Applicants will be expected to demonstrate that SuDS will function effectively over the lifespan of the development, for example, by ensuring adequate arrangements for their management and maintenance.
- 4.86** It is recognised that SuDS techniques will depend on site characteristics and the type of development proposed. Where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations), justification must be provided along with proposed alternative sustainable approaches to surface water management.
- 4.87** Major schemes must be designed to reduce flows to a 'greenfield rate' of run-off rate, where feasible. A greenfield run-off rate is one that reflects the natural rate of water run-off from a site before development. The volume of run-off that must be stored on site should be calculated based on the nationally agreed return period value of a 1 in 100 year critical storm event (including an appropriate allowance for climate change). If it is suitably demonstrated that these requirements cannot be achieved, for example, by reasons of site condition or financial viability, then run-off rates should be minimised as far as possible. The fact that a site is previously developed and has an existing high run-off rate will not constitute justification.



Bruce Castle

## **POLICY DM26: CRITICAL DRAINAGE AREAS**

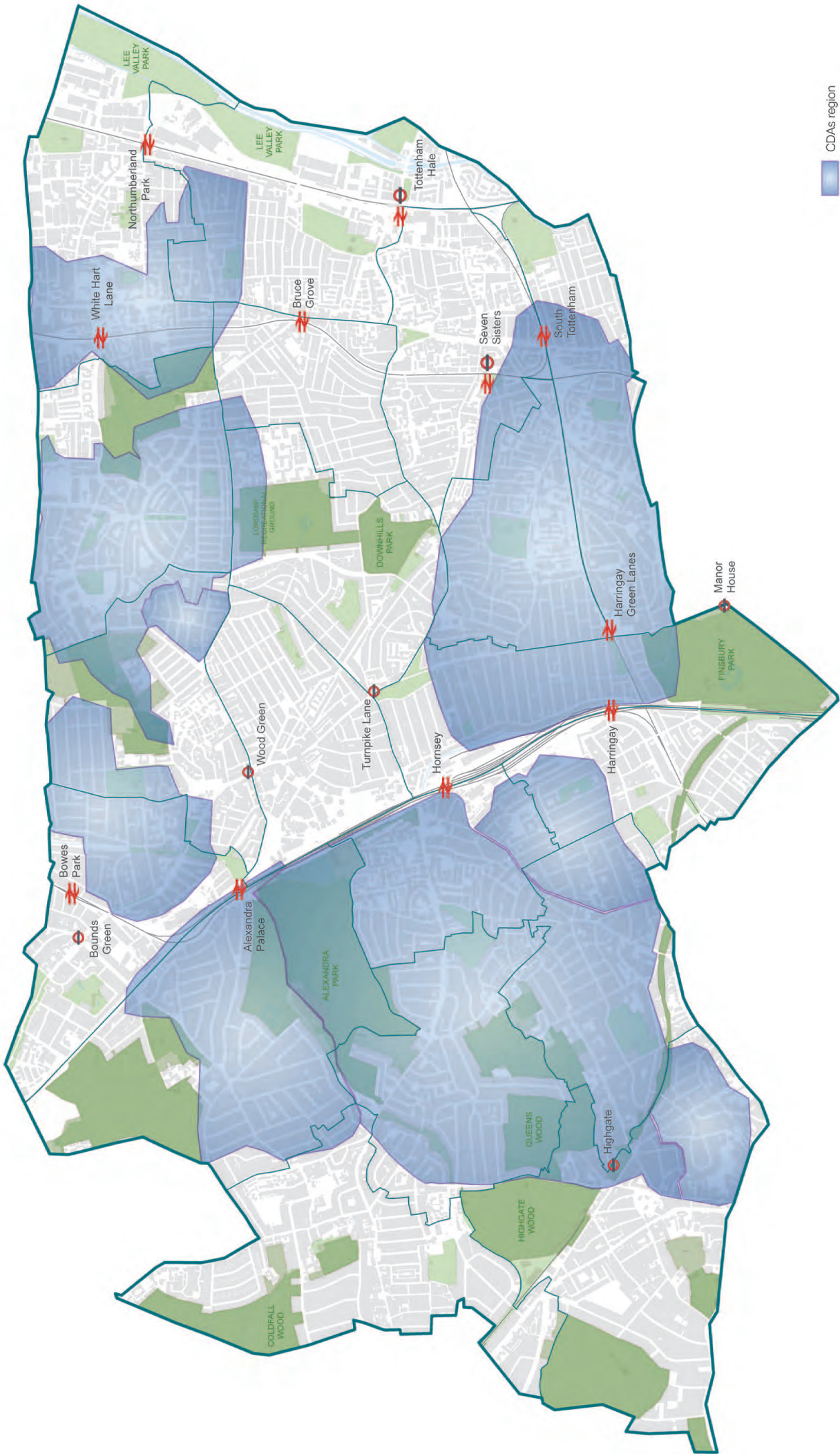
- A** All proposals for new development within a Critical Drainage Area (CDA) will be required to incorporate measures to reduce the overall level of flood risk in the CDA.
- B** Proposals for new development within Local Flood Risk Zones must include a statement describing how flood risk issues have been addressed. The Council may require a further site-specific Flood Risk Assessment to assess risk, particularly from surface water flooding.

**4.88** Haringey has prepared a Surface Water Management Plan (SWMP) that identifies areas in the Borough at greatest risk of surface water flooding. These are known as Critical Drainage Areas (CDA). Within these CDAs there are identified Local Flood Risk Zones (LFRZ) that represent the extent of predicted flooding in specific locations. The SWMP identifies 9 CDAs within the Borough. It is important that new development appropriately responds to managing flood risk in these locations.

**4.89** Proposals for sites located within LFRZ must include a planning statement addressing flood risk. The Council may require a further site-specific Flood Risk Assessment to assess the risk of flooding, subject to site location and the extent of flood risk. Applicants are encouraged to liaise with the Council at the pre-application stage in order to help identify planning application requirements.

**4.90** Planning statements and FRAs should be commensurate with the nature and scale of the proposed development as well as the assessed risk of flooding. In particular, emphasis should be placed on ensuring that surface water run-off from the site does not heighten flooding in the CDA and provide assurance of safety in terms of development layout and design.

FIGURE 4.5 Critical Drainage Areas





## **POLICY DM27: PROTECTING AND IMPROVING GROUNDWATER QUALITY AND QUANTITY**

- A The Council will seek to protect and improve the quality and quantity of groundwater resources within the Borough.
- B All proposals for new development will be required to identify existing and potential new sources of groundwater pollution and where appropriate, submit a relevant desktop study to demonstrate this has been fully considered, including on sites with an historic legacy of contamination.
- C All proposals for new development must ensure that:
  - a There is no adverse impact on groundwater quality, either by design, construction or operation of the development; and
  - b Appropriate construction techniques are used in order to limit disturbance to natural groundwater flows.
- D The Council will refuse proposals for new development in Source Protection Zones where there would be an unacceptable risk to groundwater quality.

- 4.91** The Water Framework Directive sets out objectives for improving groundwater quality. Groundwater bodies are classified under the Directive and the Council has a duty to ensure this important resource is protected.
- 4.92** Sites that have an historic legacy of contamination should be properly investigated and if contamination is found, developers will be expected to prepare and implement a remediation strategy in line with Policy DM23.
- 4.93** There are a number of groundwater abstraction points in Haringey that are used for public water supply. These require protection from existing and potential new sources of pollution so that groundwater quality can be maintained. The Environment Agency has identified and mapped Source Protection Zones (SPZs) and aquifers within the Borough. Managing risk to groundwater contamination is particularly important in these areas.

- 4.94** New development should not propose unsuitable drainage measures, such as infiltration, which could adversely impact on water quality. Furthermore, where development involves the construction of foundations and piling, these must not create pathways for contamination.
- 4.95** Further details on implementation of this policy are set out in Environment Agency guidance, currently Groundwater Protection: Policy and Practice (GP3).

## **POLICY DM28: PROTECTING AND ENHANCING WATERCOURSES AND FLOOD DEFENCES**

- A New development must be set back at a distance of 8 meters from a main river and 5 meters from an ordinary watercourse, or at an appropriate width as agreed by the Council and the Environment Agency, in order to provide an adequate undeveloped buffer zone.
- B Development proposals on sites containing a main river or ordinary watercourse will be required to demonstrate how the objectives of the Thames River Basin Management Plan and London River Restoration Action Plan have been taken into account.
- C Having regard to (B) above, all major development will be required to and minor development should:
  - a Investigate and secure the implementation of environmental enhancements to open sections of the river or watercourse; and
  - b Investigate and secure the implementation of measures to restore culverted sections of the river or watercourse.
- D The Council will resist proposals that would adversely affect the natural functioning of main rivers and ordinary watercourses, including through culverting.
- E Where appropriate the Council will require proposals to include a condition survey of existing watercourse infrastructure to demonstrate that it will adequately function for the lifetime of the development, and if necessary, make provision for repairs or improvements.
- F Development on or adjacent to a watercourse must not result in the deterioration of the quality of that watercourse.

- 4.96** Watercourses in Haringey form part of the network of rivers and streams within the London basin. They are an important resource that offer amenity, support biodiversity and play a critical role in sustainable flood management (such as by reducing the speed of water run-off and providing capacity for flood storage). Many watercourses have been significantly altered from their original state thus compromising these key functions. This is owing to a legacy of urban development in which watercourses were redirected away from sites or piped into culverted sections below ground. The Council will seek to stop and reverse such unsustainable alterations by requiring that proposals for site redevelopment fully exploit opportunities to restore and enhance the natural functioning of watercourses. This is in line with the London Plan objectives for the Blue Ribbon network and the Council will extend these policy principles to all watercourses in Haringey.
- 4.97** The improvement of waterbodies to 'good' ecological status or potential, and not allowing any deterioration in the status of waterbodies, are key requirements of the Water Framework Directive. This policy is set in the context of the Directive and will ensure that new development supports its objectives.
- 4.98** Haringey lies in the Lower Lee River catchment and the River Lee has historically suffered from poor water quality. Further, the River Lee, Pymmes Brook and Moselle Brook are currently classified as having 'moderate' ecological status and steps are needed to enable them to reach 'good' status.
- 4.99** The Thames Basin River Management Plan aims to prevent the deterioration and improve the quality of London's waterways. The plan's objectives and actions for watercourses in Haringey should be considered for all new proposals where relevant. In addition, the River Restoration Action Plan sets out details on local opportunities to restore sections of the River Lee. It is updated regularly and applicants should refer the Action Plan accordingly.
- 4.100** The term watercourse applies to both main rivers and ordinary watercourses. Main rivers are all watercourses shown on the statutory main river maps held by the Environment Agency and the Department of Environment, Food and Rural Affairs. Ordinary watercourses are all other watercourses.
- 4.101** Culverts are considered flood defences. Sites with existing culverts will be expected to investigate the feasibility of deculverting within the Flood Risk Assessment. Where the implementation of measures to restore section of the watercourse is not considered possible, clear and robust justification must be provided. There are opportunities for deculverting within Tottenham and Northumberland Park, and in particular, the Moselle Brook and Stonebridge Brook which are both heavily modified waterbodies and largely in culvert.
- 4.102** New development needs to be set back from watercourses and flood defences in order to provide an appropriate buffer zone to ensure the natural functioning of watercourses. Buffer zones offer many benefits including for flood resilience and biodiversity. Adequate space is also needed to allow for access and maintenance of flood defences. Buffer zones should be left free of any permanent structures and carefully integrated with new developments so as to maximise their amenity value.
- 4.103** There are sites in the Borough where built flood defence infrastructure may need to be retained and enhanced, particularly to maintain water flows and support network drainage systems. Where appropriate the Council will require developers to submit a condition survey of this infrastructure and if necessary, make provisions for its repair through legal agreement of planning conditions.



Open Space

## **POLICY DM29: ON-SITE MANAGEMENT OF WASTE WATER AND WATER SUPPLY**

- A The Council will seek to ensure that there is adequate surface water, foul drainage and sewerage treatment capacity to serve all existing and new development. All proposals for new development will be required to:
- a Demonstrate that the local public sewer network has adequate capacity to serve the existing and proposed development, or where such capacity does not exist, provide for suitable alternative arrangements for discharging water;
  - b Ensure the separation of surface and foul water systems, including by investigating and rectifying any identified misconnections; and
  - c Implement sustainable drainage systems, in line with Policy DM25.
- B The Council will give preference to mains foul drainage and will seek to restrict the use of non-mains drainage for foul water disposal, particularly in Source Protection Zones, in line with Environment Agency guidance. Where non-mains drainage is proposed for the disposal of foul water, a foul drainage assessment will be required to ensure the most sustainable drainage option will be implemented.
- C All proposals for new development will be required to:
- a Demonstrate that there is adequate water supply infrastructure capacity both on and off site to serve the development without adversely impacting on existing users; and
  - b Make provision for the installation and management of measures for the efficient use of mains water.
- D All proposals for new residential development should be designed to meet the London Plan target for mains water consumption.

- 4.104** Effective sewerage and wastewater infrastructure is fundamental to sustainable development. Sewerage infrastructure is essential for flood defence. Incremental misconnections between surface and foul water drainage systems can place additional pressure on the sewer network and heighten the risk of flooding. As well, misconnections to the sewer system can contribute to water pollution where foul and waste water enter the surface water system.
- 4.105** The impact of sewer flooding is generally localised to where a blockage or failure of a sewer network occurs. Historic records indicate that areas in Tottenham, Crouch End, Highgate, and Muswell Hill have flooded due to sewers.
- 4.106** Where a proposed development increases the demand for sewerage and water supply infrastructure, it must be demonstrated that sufficient capacity already exists or that extra capacity will be provided. Where there is a capacity issue and no improvements are programmed by the water or sewerage undertaker, then the applicant or developer needs to contact the water or sewer company to agree what improvements are required and how they will be funded prior to any occupation of the development. In some circumstances, the Council may require that a water supply or drainage strategy is prepared by the developer, in liaison with the water or sewerage undertaker.
- 4.107** With regard to drainage capacity enhancements, where Thames Water has raised concerns regarding the sewerage network capacity to serve future development (including on strategic sites in the Tottenham Area Action Plan) a drainage strategy will need to be produced by the developer in liaison with Thames Water. This is to include a detailed model of the network capacity to determine if mitigation is required. The drainage strategy is required to ensure any appropriate mitigation, including network upgrades, are undertaken ahead of occupation of the development.
- 4.108** Joint working will be necessary between the Council, Thames Water and Environment Agency to ensure that development proposals discharge into the sewer network in a suitable manner and that any planned infrastructure improvement works are considered in a coordinated way.

- 4.109** A major upgrade is being planned by Thames Water for the Deephams Sewage Works during the plan period. This is to meet new environmental standards and to accommodate growth within the catchment which includes Haringey. The principle of the upgrade is supported as being necessary to deliver infrastructure to meet existing and future wastewater demands.
- 4.110** With respect to surface water, the Council will expect that storm flows are attenuated or regulated into the receiving public network through on or off site storage. When it is proposed to connect to a combined public sewer, the site drainage should be separate and combined at the final manhole nearest the boundary. Where it is proposed to discharge to a public sewer prior approval from Thames Water will be required.
- 4.111** Ensuring a sustainable and secure water supply is a key strategic priority of the London Plan. This is particularly important in the context of a growing population and increased demand for water. The Council will therefore seek to ensure that all new residential development is water efficient and designed to meet the London Plan target for water mains consumption.



Recreation

## **POLICY DM30: NEW WASTE FACILITIES**

**A** Development proposals for all new waste facilities (including transfer and treatment facilities) will be required to demonstrate that any impacts caused by the operation of the facility can be controlled to achieve levels that will not have a significant adverse effect on human health and the environment.

- 4.112** This policy supports the priorities set out in Haringey's Strategic Policies Local Plan, including Policy SP6. The Council will seek to ensure that new waste facilities promote the principles of sustainable development, minimise their impact on climate change and ensure new waste facilities do not give rise to unacceptable impacts on the local and wider environment, including the amenity of residents.
- 4.113** To meet North London's waste needs the Council is working with North London partners to progress the North London Waste Plan. This plan will identify sites and areas suitable for waste management facilities. It will also include additional policies to manage the design and impact of new facilities.

# Transport and Parking

CHAPTER

**05**

## POLICY DM31: SUSTAINABLE TRANSPORT

- A The Council will require that developments with high trip generating characteristics locate where public transport accessibility is high and car parking is minimised to mitigate generated car travel.
- B The Council will support the protection, improvement and creation of pedestrian and cycle routes in the Borough to encourage walking and cycling both as a means of transport and as a recreational activity. The Council will also encourage improved links between pedestrian and cycle routes and public transport facilities, particularly at transport hubs.
- C The Council will require the submission of a Travel Plan and a Transport Assessment/ Statement in support of development proposals in accordance with the Transport for London thresholds.<sup>13</sup>

- 5.1 Many of the Borough's roads suffer from high levels of traffic congestion over much of the working day. With demand for more housing and increases in employment the impact of such growth on the highway and public transport networks needs to be minimised. Measures such as travel plans and car clubs which reduce car ownership and usage can support this policy.
- 5.2 The provision of a safe walking and cycling environment is critical to encouraging the uptake of sustainable modes of transport. Measures such as cycle routes and cycle parking can support sustainable development.

- 5.3 The Council will require a Travel Plan or Transport Assessment in line with thresholds set out within Transport for London Travel Planning Guidance. In accordance with this guidance, the Council may still require a Transport Assessment and a Full Travel Plan to accompany applications for new developments that do not meet these thresholds, where a transport impact is expected from the development, or a cumulative impact is expected from different uses within a development or from a number of developments in the vicinity.

## POLICY DM32: PARKING

- A Development proposals will be assessed against the car parking and cycle parking standards set out in the London Plan.
- B The Council will strongly encourage contributions to car club schemes or the provision of car club bays as an alternative to on-site car parking
- C The Council will support proposals for new development with limited or no on-site parking where:
  - a There are alternative and accessible means of transport available;
  - b Public transport accessibility is at least 4 as defined in the Public Transport Accessibility Index;
  - c A Controlled Parking Zone (CPZ) exists or will be provided prior to the occupation of the development;
  - d Parking is provided for disabled people; and
  - e Parking is designated for occupiers of developments specified as car capped.

- 5.4 The Council will apply its parking standards to restrain car use, to reduce congestion, to improve road safety, to give priority to essential users and people with disabilities, to improve the environment, to improve local accessibility and to encourage sustainable regeneration.
- 5.5 The Council also supports the provision of electric charging points in new developments with the aim of encouraging greater use of electric vehicles. Levels of provision are detailed within chapter 6 of the London Plan.
- 5.6 The availability of car club vehicles has been shown to reduce the level of car ownership and usage. The Council considers this would contribute to sustainable development in the Borough. Car club bays can be placed on-site if they would be accessible to the public as well as for the occupants of the site or on the public highway close to the development.

<sup>13</sup> Transport for London website  
<https://www.tfl.gov.uk/info-for/urban-planning-and-construction/travel-plans>



- 5.7** The construction of new residential developments without car parking would support Council policies to reduce car dependency and the encouragement of other modes of transport. However, residential developments without car parking provision are only likely to be viable where there are alternative and accessible means of transport available, in particular a good level of public transport accessibility (PTAL rating of 4 or above) and where a Controlled Parking Zone (CPZ) is in existence or planned within the timescale of the proposed development.
- 5.8** Appropriately located on-site disabled parking will be required with at least one on or off-site disabled parking space for each car-free development. Disabled parking spaces should be provided for all wheelchair accessible housing in car-free developments. The Council will not issue residents on-street parking permits for car free or car capped developments, which have a limited number of on-site parking spaces. However, occupiers of defined car free or car capped developments would be eligible for visitor's permits. The Council will use legal agreements to require landowners to advise occupiers of the car free or car capped status of a development. For family sized dwellings (3 or more bedrooms) the Council would expect car parking provision in line with its car parking standards.
- 5.9** Although residents of car-free housing are less likely to park a long distance away from their home, the Council will seek, in the longer term, extensions to existing controlled parking zones. Where public transport provision can be improved to increase the levels of public transport accessibility and facilitate car-free residential development, the Council may seek to augment provision through a section 106 or other legal agreement. The Council will require a section 106 or other legal agreement for all new car-free developments of more than 4 residential units.
- 5.10** For larger developments the parking requirement will be assessed on an individual basis as part of the Transport Assessment or Statement.

## **POLICY DM33: CROSSOVERS, VEHICULAR ACCESS AND ADOPTING ROADS**

- A** The Council will only support a proposal for a crossover or new vehicular access where it is demonstrated that the proposal does not result in:
- a A reduction in pedestrian or highway safety;
  - b A reduction of on-street parking capacity within a Controlled Parking Zone; or
  - c A visual intrusion to the street scene.
- B** New access roads to new development will only be adopted where they:
- a Serve a large number of residential dwellings (generally greater than 200 units);
  - b Form a link to the highway network; and
  - c Form a useful extension to an existing highway.

- 5.11** Creating private off-street parking frequently involves the loss of on-street spaces and offers potential for increased pedestrian safety concerns, for example where kerbside parking is removed to enable vehicles to cross over the pavement to a garden or forecourt.
- 5.12** In considering an application for a crossover the Council will assess the need for safe and efficient operation of an existing Controlled Parking Zone. Applications will be refused where it is deemed that the construction of a crossover and subsequent loss of parking spaces would have a detrimental impact to on-street parking within the Controlled Parking Zone. Any proposals for crossovers on the Transport for London Road Network will require approval by TfL. Proposals should be in line with TfL's Crossover Guidance and the Council's Crossover Guidance.

## **POLICY DM34: DRIVEWAYS AND FRONT GARDENS**

- A** The Council will only permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained. Any hard standing should seek to improve drainage and reduce flooding through the use of a permeable paving material.

**5.13** Cumulative loss of front garden space can result in increased flood risk caused by surface water run-off because of the greater expanse of impermeable surfaces. The loss of vegetation can also contribute to increased air pollution in urban areas. The loss of front gardens can also impact the character and appearance of neighbourhood resulting in harm to established streetscapes and the uniform appearances of groups of houses. Where the Council can manage the loss of gardens, not including development which is permitted, it will seek the retention of 50% of the garden as soft landscaping and any hardstanding should be constructed from a permeable material.

**5.14** Cycle storage provision located in residential front gardens should have minimal visual impact on the property or the street. To ensure the existing character and appearance of the property and surrounding streetscape are protected, particularly in Conservation Areas, the appearance of cycle storage facilities visible from the public highway need to be of high quality design, subtle in size and colour and built from materials which are in keeping with their surroundings.

**5.15** In front gardens, all storage units require planning permission. The preferred location, to place/build the storage unit is where visual impact is minimal. Appropriate screening should be used - perhaps using plants. Materials should be used, which are in keeping with the locality – reflecting the original materials of the property. If the storage unit is painted, choosing colours already used on the property or dark or subdued colours such as dark green/black help minimise the visual impact. Access doors must not overhang the highway (pavement or road). The height should be the same or less than the boundary treatment (wall/fence) where feasible.

## POLICY DM35: CYCLE STORAGE IN FRONT GARDENS

A Cycle storage on front gardens should be of high quality design, should not be visually intrusive and should not harm the amenity of surrounding properties. Planning applications for cycle storage should have regard to the following:

- a The size of the shed or storage shelter, the building and the garden;
- b Its location;
- c Level of screening; and
- d The nature of the materials used

## POLICY DM36: MINI CAB OFFICES

- A Proposals for mini-cab offices should only be located within Secondary Frontages of town centres, in designated Local Shopping Centres or adjacent to transport interchanges.
- B In considering applications for mini-cab offices (and driving school offices) the Council will have regard to whether the proposal would have an adverse effect on traffic conditions in the area in particular the safe and efficient operation of buses.
- C Where proposals are considered acceptable in principle:
  - a The Council will impose conditions relating to hours of operation, and noise;
  - b Permission will normally be granted in the first instance for a limited period of 1 year, in order to assess and review the impact of the use, and made personal to the applicant.



**5.16** Mini cabs offer an additional choice of transportation and provide a valuable service to certain sections of the community. In addition they could offer new business and employment opportunities for some local people.

**5.17** They can however cause a loss of amenity to neighbours, such as through noise, parking problems, customers visiting the office, and therefore relevant conditions will be imposed. These problems can be exacerbated by being located in inappropriate locations such as in residential areas.



# Employment and Town Centres

CHAPTER

06

# Employment and Town Centres

# 06

## Managing Haringey's Employment Land

- 6.1** Haringey's Strategic Policies Local Plan sets out the Council's approach to strengthening the local economy, helping to ensure provision for a wide range of businesses and jobs in the Borough, as well as improving residents' access to these jobs. It establishes a hierarchy of Designated Employment Areas and sites that will be safeguarded over the plan period. This is necessary to ensure a sufficient amount of land for employment generating uses and local jobs.
- 6.2** The Designated Employment Areas have been updated since the adoption of the Strategic Policies Local Plan (2013). Further information is set out in the Site Allocations DPD (Policy SA2) and the Tottenham Area Action Plan (Policy AAP4).
- 6.3** The following section sets out detailed policies to assist in managing development within Haringey's employment land hierarchy. The policies are needed to ensure that the use of land is fully optimised to enable the maximum amount of jobs and employment floorspace to be provided on sites, as well as to encourage and attract the types of businesses that are supported by the Council's economic and regeneration strategies.
- 6.4** It is recognised that viability issues pose a significant challenge to sustainable economic and employment development. Mixed-used development offers an opportunity to respond to and overcome these issues, providing floorspace for business whilst delivering other uses that support sustainable communities such as housing and social infrastructure. The following section sets out the Council's framework to facilitate such enabling mixed-use development and ensure it is appropriately managed.
- 6.5** This section also introduces policy requirements for the use of land currently in employment use but which is not within the designated employment land hierarchy.

## POLICY DM37: MAXIMISING THE USE OF EMPLOYMENT LAND AND FLOORSPACE

- A** Within designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Area – Employment Land, as identified on Haringey's Policies Map, proposals for the intensification, renewal and modernisation of employment land and floorspace will be supported where the development:
- a** Is consistent with the range of acceptable uses in Policy SP8;
  - b** Wherever possible, is designed to allow for future flexibility of use including subdivision and/or amalgamation to provide for a range of business types and sizes, including small businesses;
  - c** Makes adequate provision of space for on-site servicing and waiting goods vehicles;
  - d** Improves and enhances the quality of the environment of the site and business area; and
  - e** Makes a demonstrable improvement in the use of the site for employment purposes, having regard to:
    - i** The quality and type of employment floorspace provided;
    - ii** The quality and density of jobs to be accommodated on-site; and
    - iii** The proposal's contribution to the achievement of economic objectives and outcomes set out in the Local Plan and the Council's other key plans and strategies.
- 6.6** The Council is committed to meeting its London Plan employment target of 12,000 new jobs over the Plan period, delivering a significant increase in the number of local jobs, as well as providing more opportunities for residents to access good quality employment and share in the Borough's economic prosperity.
- 6.7** Technical evidence, including Haringey's Employment Land Study (2015), indicates that the Borough's stock of employment land will remain a key source for local business and jobs. Accordingly, Policy SP8 sets out a hierarchy of employment land that will be safeguarded to meet future need. However beyond such protection a gradual restructuring of the Borough's employment land portfolio is also required. This is to enable the modernisation of existing sites and older buildings so as to attract a wider range of businesses to the Borough, make more efficient use of land and ultimately, to increase the number and quality of businesses and jobs that can be accommodated on sites.

- 6.8** The London Plan identifies the types of employment uses that are considered appropriate within Haringey's SIL. Policy SP8 sets out the range of acceptable uses in the Borough's LSIS and LEA. The following policies provide further detailed requirements for these designated sites. The policies should be considered alongside any other site specific requirements included in other Local Plan documents such as the Site Allocations or Area Action Plans.
- 6.9** New business floorspace needs to be designed to both support growth and respond to changing economic circumstances. Proposals should therefore incorporate flexible design features to ensure that development is adaptable to the needs of a range of employment uses and end users over its lifespan. This is especially important to support the growth of smaller and new start-up businesses. Local evidence indicates that Haringey has a strong concentration of Small and Medium Sized Enterprises (SMEs) including in the knowledge-based, creative and cultural sectors. SMEs perform a key role in the economy and local job offer and it is necessary to ensure a sufficient supply of premises for them.
- 6.10** It is vital that the Borough's employment areas are able to retain and attract new occupiers. All proposals will therefore be expected to engage with the Haringey Development Charter (see Policy DM1) to demonstrate how they will deliver high quality and sustainable designs that respond to local character and improve the overall quality, attractiveness and functionality of employment locations.
- 6.11** In addition, all proposals for employment development must demonstrate how they will promote inward investment and contribute to area regeneration, where appropriate, by positively engaging with the Council's key plans and strategies including Haringey's Economic Development and Growth Strategy. Proposals will be considered having regard to their capacity to maximise employment floorspace and job densities on site, improve the quality and diversity of the local job offer and deliver positive economic outcomes.

## **POLICY DM38: EMPLOYMENT-LED REGENERATION**

- A** The Council will support proposals for mixed-use development within a Local Employment Area – Regeneration Area or on a highly accessible non-designated employment site where this is necessary to facilitate the renewal and regeneration (including intensification) of existing employment land and floorspace. In addition to complying with other policy requirements, proposals must:

- a Suitably demonstrate that for reasons of viability a mixed-use scheme is necessary to facilitate the delivery of employment floorspace;
- b Maximise the amount of employment floorspace to be provided within the mixed-use scheme, having regard to development viability;
- c Provide demonstrable improvements in the site's suitability for continued employment and business use, having regard to:
  - i The quality, type and number of jobs provided, including an increase in employment densities where appropriate;
  - ii Flexibility of design to enable adaptability to different business uses over the lifetime of the development;
  - iii Environmental quality of the site; and
  - iv Provision for an element of affordable workspace where viable.
- d Investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs;
- e Ensure an adequate separation of uses, particularly where new residential floorspace is introduced as part of a mixed use scheme;
- f Not conflict with or inhibit the continued employment function of the site and nearby employment sites; and
- g Enable connection to ultra-fast broadband.

- 6.12** The Local Plan seeks to protect and proactively manage Haringey's stock of industrial land. It is recognised that some of this stock may no longer be fully viable for employment development or that certain sites need to change to better meet modern business requirements. In response to these issues the Council will apply a more flexible approach to the development of some employment sites, supporting mixed-use schemes where they will facilitate site regeneration and renewal. This approach is needed to help make employment development more viable, to ensure sites continue to make a positive contribution to Haringey's economy and deliver an uplift in local job numbers.
- 6.13** Mixed-use redevelopment of employment land will be restricted to Local Employment Area – Regeneration Areas and other highly accessible non-designated employment sites. The Strategic Policies Local Plan provides the basis for a more flexible approach to development in such Regeneration Areas. Furthermore, the London Plan and Haringey's Strategic Policies require that more intensive land uses are directed to highly accessible locations. Mixed-use schemes proposed on non-designated employment sites will not be considered suitable if they are in areas of poor public transport accessibility.

- 6.14** Applicants will be required to submit a viability assessment that clearly demonstrates the proposed mixed-use scheme is necessary to cross-subsidise and enable the development of employment uses. The viability assessment must be independently appraised by an agreed Royal Institution of Chartered Surveyors (RICS) professional. Mixed-use proposals will not be acceptable unless the introduction of a non-employment use is demonstrably necessary to make the employment development viable. The Council will seek the maximum reasonable amount of industrial and business floorspace possible on site, taking account of the minimum required non-commercial floorspace required to make the development viable.
- 6.15** Proposals will be assessed having regard to their contribution to delivering the Council's economic and regeneration strategies. This includes consideration of the number and quality of jobs provided, delivery of floorspace which meets local need, flexibility of design to enable adaptability to different users over the plan period and other interventions which enhance the site's business function and help attract inward investment.
- 6.16** As identified in Haringey's Community Infrastructure Levy (CIL) Viability Study (2013), there is an expected significant uplift from existing to future use value where residential development is introduced. The Council considers that LEA – Regeneration Area sites will offer flexibility in terms of design and delivery of future use. They should therefore be considered for suitability to meet identified need for gypsy and traveller accommodation, having regard to site viability, design considerations and other relevant Local Plan policies.
- 6.17** Where non-employment uses are introduced it is imperative that the employment and business function of the LEA or non-designated site remains intact. The key intention of this policy is to ensure that existing employment sites continue to help meet the Borough's business and employment needs. All proposals will need to consider impacts on amenity at an early stage and demonstrate that new uses will not prejudice the continuation of industrial and commercial activities. In considering proposals, the Council will also take into account the cumulative impact of non-employment uses.
- 6.18** Some uses, such as town centre uses, may not be appropriate in certain employment locations. It is therefore important that mixed-use proposals have regard to the full complement of Local Plan policies, including those on town centres and community infrastructure, which provide additional considerations for locating new development.
- 6.19** Further detailed design requirements for employment enabling mixed-used schemes are set out in other Development Management policies, including those in the Chapter 2 on Design and Character.

## POLICY DM39: WAREHOUSE LIVING

- A** The Council has made provision for proposals for warehouse living within the Haringay Warehouse District as defined in the Site Allocations Document, and the Fountayne & Markfield Roads area as defined in the Tottenham Area Action Plan.
- B** The Council will support proposals for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element.
- C** The preparation of a masterplan will have regard to the following matters:
- The access arrangements, physical condition and layout of the existing buildings and accommodation on the site;
  - The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community;
  - The host community's existing and future accommodation needs for creative living and working;
  - The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b);
  - The size and type of both the workplace space and residential accommodation to be provided, having regard to:
    - the needs of SMEs for smaller unit sizes (<100m<sup>2</sup>);
    - provision for communal work space, both internal and external;
    - the need for low-cost workspace and affordable residential accommodation to support and grow the existing start up and creative industry sectors.
  - The interface with, and potential impact on, neighbouring uses;
  - The internal layout of uses and therein, the potential to optimise the positive inter-relationships and avoid, where practicable, negative impacts;
  - Having regard to (e – g) above, the building specifications and amenity standards to be achieved for both the workshop space and the residential accommodation;
  - The specific site requirements as identified in the individual site allocations;

- j Controls over the management and operation of the warehouse living spaces, in particular, the means by which to ensure that the use of the site continues to promote the genuine inter-relationship of the living and working elements;
  - k Servicing and parking requirements; and
  - l Viability, including requirements for cross-subsidy from other uses including private residential development (market sale/PRS etc).
- D Applications for non ‘warehouse living’ proposals within the industrial estates identified in Part A of the policy will be assessed against the requirements of Policies DM38, DM40 and Site Allocations as appropriate.
- E Proposals for warehouse living on industrial estates not identified in Part A of the Policy will be resisted as will proposals for Live/Work anywhere within the Borough.

- 6.20** The identified employment areas already contain varying elements of warehouse living. The policy seeks to further regularise/legitimise this use, and through the planning process, ensure existing and future occupants are provided with an appropriate standard of living; the existing creative industries and SME sectors are supported and given room to grow; and the creative living and working offer of these sites is maximised. The expected outcome is to secure a long-term sustainable economic future for these employment land sites.
- 6.21** A masterplan approach is advocated, as the Council considers that the outcomes sought through redevelopment of these sites for this bespoke product – warehouse living - is unlikely to be fully realised through criteria based policy assessment alone.
- 6.22** By legitimising warehouse living, the Council is also seeking to ensure that the outcomes sought are enforceable. Transparency is therefore required around the control and management of the different uses on these sites to avoid, in particular, the severance of the dependent working and living inter-relationship and the potential for the commercial floorspace becoming de facto residential use over time.
- 6.23** Warehouse living proposals on other employment sites will be resisted to avoid jeopardising the continued use of these estates for more traditional industrial activities.

## **POLICY DM40: LOSS OF EMPLOYMENT LAND AND FLOORSPACE**

- A Subject to other policy requirements, the loss of non-designated employment land and floorspace to a non-employment use will only be permitted where:

- a It is demonstrated that the site is no longer suitable or viable for the existing or an alternative industrial or business use; and
  - b There is clear evidence that an open and recent campaign to market the site, covering a minimum continuous period of 3 years, has been undertaken without success.
- B Where the Council is satisfied that the loss of non-designated employment land or floorspace is acceptable, it will require new development proposals to apply a sequential approach to delivering an alternative use through redevelopment as follows:
- a Strategic community infrastructure appropriate to the location;
  - b Mixed-use development that includes employment generating and/or community uses;
  - c Residential use.
- C Proposals involving the total loss of employment floorspace will be required to make a financial contribution towards employment regeneration projects, training schemes, job brokerage services or business support initiatives in line with Policy SP9.

- 6.24** It is imperative that the Borough has a sufficient amount of employment land to meet current and future need. The Council will therefore seek to protect the Haringey’s existing stock and strongly resist proposals involving the loss of employment land and floorspace. However, in line with the National Planning Policy Framework, it is recognised that there is a need for the plan ensure sufficient flexibility and respond to changes in market conditions.
- 6.25** Throughout the Borough there are a number of non-designated employment sites in commercial and industrial use. The Council recognises the important contribution these sites make to the local economy especially when their cumulative economic impact is considered. Unless these sites are given protection there is a risk they will be lost to other types of development, such as housing, without full consideration of their potential to support other employment generating uses or strategic infrastructure.
- 6.26** Where a loss of non-designated employment land or floorspace is proposed the Council will require that applicants submit a statement and evidence demonstrating that the site is no longer suitable or viable for the existing or an alternative employment use. Considerations may include access, compatibility of adjoining uses, site size and orientation and other potential development constraints.

- 6.27** Proposals will need to provide clear and robust evidence of a marketing campaign to demonstrate that the site is no longer suitable and/or viable for the existing employment use. This should include well documented evidence of an unsuccessful marketing campaign, normally over a period of 3 years (including details of commercial agents, adverts in publications and lease terms offered to existing or previous occupants). In exceptional circumstances where the vacancy period has been less than 3 years, the Council will require a robust market demand analysis that supplements other evidence.
- 6.28** Where it is demonstrated that the employment premises and site are no longer suitable for continued business use the Council will require applicants to investigate opportunities for site redevelopment following a sequential approach. This approach prioritises local requirements for strategic social infrastructure, as identified in the Council's Infrastructure Delivery Plan (IDP), followed by mixed use development, subsidising employment generating or community uses, before defaulting to pure residential development. Some employment or community uses may be more appropriate to town centres and may not be acceptable in all circumstances.

## Town centres and related uses

### POLICY DM41: NEW TOWN CENTRE DEVELOPMENT

- A** Proposals for new retail, leisure and cultural uses within Metropolitan and District Town Centres will be supported where they:
- a Are consistent with the size, role and function of the centre and its catchment;
  - b Sustain and enhance the vitality and viability of the town centre network; and
  - c Contribute to the delivery of Haringey's spatial strategy.
- B** Proposals for new retail, leisure and cultural uses at edge-of-centre locations will be permitted where:
- a It is demonstrated through the sequential approach to site selection that there are no appropriate town centre sites available and the proposed location is the most preferable in light of alternatives considered; and
  - b The proposal complies with (A) above.
- C** Proposals for new retail, leisure and cultural uses in out-of-centre locations will only be permitted where:

- a It is demonstrated through the sequential approach to site selection that there are no appropriate town centre or edge-of-centre sites available;
- b Having regard to (a) above, consideration has been given to reasonable alternatives in terms of the format and scale of development in order to accommodate the use in town or edge-of-centre sites; and
- c The proposal has been subject to an impact assessment, where required by national policy, and will not demonstrably harm centres within its catchment.

- 6.29** The Borough's network of town centres comprises a metropolitan centre, six district centres (including a new centre at Tottenham Hale) and 38 local shopping centres. The role and function of these centres vary according to the scope of their catchment areas with the Metropolitan and District Town Centres generally providing a wider range of shops, services and amenities than smaller local centres. The Council will seek to maintain and reinforce the town centre hierarchy by requiring proposals for new development to be compatible in terms of use and scale with the centres within which they are located.
- 6.30** This policy is consistent with the NPPF in seeking to ensure the vitality and viability of town centres by applying a sequential approach to the site selection process for appropriate town centre uses. The policy sets out a 'town centre first' principle for retail, leisure and cultural development. Where it is demonstrated that suitable town centre sites are not available, the Council will consider proposals at accessible and well connected edge-of-centre locations.<sup>14</sup> To support implementation of this policy, the Council has identified Primary Shopping Areas on the Policies Map where new retail development should be focused.
- 6.31** Only if suitable sites are not available in town or edge-of-centre locations will the Council give consideration to out-of-centre proposals for retail, leisure and cultural development. Such development, either individually or cumulatively over time, can undermine the town centre hierarchy by competing with established centres and adversely impacting on their vitality and viability. The Council will therefore seek to ensure that all efforts are made to identify and direct to development to suitable town or edge-of-centre locations. In line with NPPF paragraph 24, applicants will be expected to demonstrate flexibility on issues such as format and scale of development, so as to fully investigate the potential for accommodating the proposed use at the most sequentially preferable locations.

<sup>14</sup> Edge of centre locations are defined in the National Planning Policy Framework – Annex 2: Glossary.



Tottenham High Road

**6.32** In assessing any proposed retail development the Council will take into account the scale, location and nature of the proposed development. The submission of a retail impact assessment for proposals falling outside of the town centre hierarchy will be required in line with national policy.

## POLICY DM42: PRIMARY AND SECONDARY SHOPPING FRONTAGES

- A** Within Primary Shopping Frontages of the Metropolitan and District Town Centres, as defined on the Haringey Policies Map, the use of ground floor units for retail, financial & professional services, restaurants & cafes and pubs & bars will be permitted where:
- a The overall number of units in non-retail use (including extant planning permissions) will not exceed 35% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre;
  - b The continuity of the centre's retail frontage will be maintained, normally with no more than two adjoining units in non-retail use; and
  - c An active frontage is provided.
- B** Within Secondary Shopping Frontages of the Metropolitan and District Town Centres, as defined on the Haringey Policies Map, the use of ground floor units for appropriate town centre uses will be permitted where:
- a The overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre; and

- b An active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage.
- C** Within Secondary Shopping Frontages, the Council will give consideration to proposals for community facilities where it can be demonstrated that the use will:
- a Enhance the vitality and viability of the centre by attracting visitors to it, including by encouraging linked trips for shops and services;
  - b Ensure access to visiting members of the public; and
  - c Not result in an overconcentration of similar community uses where this would detract from the diversity of uses in the centre.
  - d Having regard to the above criteria, proposals for community uses which meet identified local need will be viewed favourably.
- D** Within designated Primary and Secondary Shopping Frontages, the Council will give consideration to the granting of temporary permissions for meanwhile uses not compliant with (A-C) above where it can be demonstrated that the use will positively support the retail function of the town centre. The temporary use of a vacant ground floor unit will be supported where it can be demonstrated that the unit is being actively marketed.

- 6.33** Haringey's Strategic Policies Local Plan recognises the important role town centres have in supporting sustainable communities, providing local residents and visitors with good access to a full range of shops, services and amenities. Policy SP10 sets the Council's intention to proactively manage uses within the Borough's town centres so that they maintain their vitality and viability.
- 6.34** Haringey's Policies Map designates Primary and Secondary Frontages within the Metropolitan and District town centres. These frontages form the basis of policies for managing the mix of ground floor uses within these centres. The NPPF provides that primary frontages should be characterised by their predominantly retail function, with secondary frontages offering greater flexibility for a broader range of town centre uses.<sup>15</sup> A key priority of the Local Plan is to give effect to this policy framework, ensuring a suitable balance of uses across the designated frontages whilst recognising their respective roles in supporting town centre functions.

- 6.35** This policy applies a threshold approach to both monitor and maintain a healthy balance of uses in the Borough's town centre frontages. The Council considers that 35% is a reasonable indicator of the point at which the high proportion of retail uses appropriate to primary shopping frontage may be threatened, having regard to vitality and viability. This benchmark threshold, which is supported by Haringey's Retail and Town Centre Study (2013), will ensure that primary frontages both retain their principal retail function and provide the necessary retail capacity to help meet Haringey's future needs.
- 6.36** It is imperative that non-retail uses do not diminish the attractiveness of Haringey's town centres or weaken the effect of the retail function, character and appearance of the primary shopping frontage. The Council will therefore resist proposals that would adversely impact on the continuity of the frontage by seeking to ensure that, as a guideline, no more than two adjoining units are in non-retail use. There is scope for flexibly applying this policy in exceptional circumstances. In such cases proposals will need to suitably demonstrate that a use will maintain a contiguous primary shopping frontage by virtue of its retail related function, including scope for encouraging connected shopping trips, and through the creation of a lively and active daytime frontage.
- 6.37** Secondary shopping frontages offer the opportunity for a broader range of appropriate town centre uses including the full range of A Class uses. It is important that these frontages contribute to the retail function of town centres. However it is recognised that they play a more complementary role in accommodating uses which attract visiting members of the public. This includes banks and building societies, restaurants and cafes and other non-retail uses which are often directly linked to shopping trips. In order to deliver a balanced mix of uses to support town centre vitality and viability, the Council will allow non-retail uses to occupy up to 50% of Secondary shopping frontage within a town centre, having regard to vitality and viability. This threshold is supported by the Haringey Retail and Town Centre Study (2013).
- 6.38** Active frontages are essential to maintaining the vibrancy of town centres and the Council will seek to ensure they are maintained throughout the designated shopping frontages. Where a new non-retail use is introduced in a shopping frontage the Council will expect the development to make a positive contribution to the townscape. This can be achieved through the creation of an active frontage associated with the use itself or where this is not suitable, through a window display or other appropriate feature creating visual interest.
- 6.39** The Strategic Policies Local Plan seeks to ensure that the Borough's town centres provide a focus for community life. To encourage a wider mix of uses, attract visitors and increase footfall the Council will support proposals for complementary community facilities - including places of worship, cultural facilities, education and training premises, and healthcare services - within designated Secondary Frontages of town centres. As with other appropriate town centre uses, community facilities should positively interface with the townscape by creating lively and active frontages.
- 6.40** National planning guidance states that local planning authorities should take full account of market signals when planning for town centres. Vacancy rates provide a useful indicator of market activity, which in turn reflects more broadly on town centre vitality and viability. Even healthy town centres will experience some level of vacancy, such as temporary vacancies that arise through the regular churn of shops and premises.
- 6.41** Recognising the need to respond to market signals, this policy sets out the Council's approach to managing development where vacancies are considered to pose a threat to a town centre's vitality and viability. Vacant shops can adversely impact on town centres, restricting the potential for visitor footfall and leaving inactive frontages which harm the townscape. The Council's priority is to bring vacant shops back into retail use, particularly within designated shopping frontages, where the impact on the health of the centre is most likely to be felt.
- 6.42** However, the temporary use of a vacant shop for a non-retail use will be supported, normally up to five years, whilst it is being marketed. This will help to ensure an active frontage in the town centre, encourage footfall and provide opportunities for short term economic activities, such as pop-up shops, which may not otherwise be attracted to such locations or premises. Town centre vacancy rates are monitored through the Authority Monitoring Report process. Applicants will be required to refer this and other information to demonstrate a proposal is policy compliant, along with evidence of an active marketing campaign
- 6.43** Economic cycles can also lead to fluctuations in the demand for town centre units. However sustained levels of high vacancy are likely to signal more significant structural issues within a town centre, thus justifying the approach for targeted strategic interventions. Where monitoring indicates a significant structural decline of a town centre, this will signal the need for a review of the existing policy position.

## **POLICY DM43: LOCAL SHOPPING CENTRES**

- A** Within Local Shopping Centres, as defined on the Haringey Policies Map, the use of ground floor units for appropriate town centre uses will be permitted where:
- a** The overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage, unless it can be demonstrated the proposal will significantly enhance the vitality and viability of the centre; and
  - b** An active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage.



- 6.44** There are a number of local centres in Haringey with designated shopping frontage which provide for the day-to-day needs of people living and working in their catchment areas. These centres are spread out across the Borough and vary significantly in size, with some smaller centres consisting of only a few shops compared to larger centres with upwards of 80 commercial units. Irrespective of their scale, the Council recognises the importance of maintaining and enhancing all local centres so that areas do not become deficient in provision of easily accessible shops and services.
- 6.45** The Council will seek to ensure that local centres continue to sustain their retail function. However in order to promote a balanced mixed of uses it will allow non-retail uses to occupy up to 50% of designated shopping frontage within a local centre, having regard to vitality and viability. As with other town centre policies the Council will seek to ensure that proposals for appropriate town centre uses maintain or create active frontages wherever possible.
- 6.46** Haringey's Retail and Town Centres Study (2013) indicates that some local centres are performing markedly better than others in terms of vacancy rates. The study does not advise that any centres should be de-designated but recommends careful monitoring of vacancies, and further encourages policies to support take up of vacant units. The Council will actively seek to manage the proportion of non-retail uses on designated frontages in local centres. However recognising the need for flexibility in applying this approach, the policy includes scope for considering proposals for non-retail uses, where the 50% threshold for such uses would be exceeded, having regard to overall impact on the centre's vitality and viability.



Crouch End

- 6.47** Neighbourhood parades represent a key component of local retail provision. Within the context of the growth expected over the Plan period, and the improving residential values in the Borough, pressure for changes of use for local retail premises to residential in a context of rising need for local facilities is forecast. This policy seeks to protect local parades for a range of town centre uses.

### Ensuring a variety of town centre uses

- 6.48** Town centres are more than just places in which to shop. They are at the heart of Haringey's local communities, offering a variety of services and activities such as commercial uses, community and cultural facilities, and other amenities which support the visitor economy. They are also suitable locations for residential development. Pursuant to the Strategic Policies Local Plan objectives, the following policies seek to ensure that town centres fully contribute to supporting sustainable, healthy communities.

## POLICY DM44: NEIGHBOURHOOD PARADES AND OTHER NON- DESIGNATED FRONTAGES

- A** Within neighbourhood parades and other non-designated shopping frontages, the use of ground floor premises for appropriate town centre, community and economic uses will be supported where an active frontage is provided, or if this is not possible, a window display or other appropriate town centre frontage.
- B** Having regard to (A) above, the change of use from retail to other appropriate uses will only be permitted where:
- a** It is demonstrated that the unit has been marketed for a minimum of one year and there is no realistic prospect of it being used for a town centre use; and
  - b** There are adequate alternative shopping facilities for local residents within a reasonable walking distance of 400 metres.

## POLICY DM45: MAXIMISING THE USE OF TOWN CENTRE LAND AND FLOORSPACE

- A** The Council will seek to maximise the use of land and floorspace within town centres by encouraging new mixed use development, including new or re-used space above shops and commercial premises, having regard to:
- a** The role and function of the town centre;
  - b** Impact on town centre vitality and viability;
  - c** Compatibility of both the proposed and existing neighbouring uses; and
  - d** Compliance with other policies.

- B** Subject to (A) above, where a proposal for residential use is acceptable the development must:
- a** Provide adequate access arrangements, including separate access for the residential element of the proposal; and
  - b** Not adversely impact on the function and appearance of the designated frontages and the town centre.
- C** Proposals requiring planning permission for the conversion of ground floor town centre premises to non-town centre uses, within designated and non-designated shopping frontages, will not be permitted.

**6.49** Ensuring the needs for retail, leisure, office and other main town centre uses are met in full across the Borough is important to delivering Haringey's spatial strategy. Planning has a role to play in promoting vibrant and viable centres and helping them to be flexible, resilient and adaptable to change. To support the evolution and diversification of town centres in Haringey each centre should support a range of uses and activities to meet the challenges they face, having regard to the current and potential future roles of each centre.

**6.50** To support a range of uses and activities in town centres, the Council is seeking to maximise opportunities for additional sources of land and floorspace to come forward through the planning process, including underused or vacant upper storeys of town centre retail and other buildings, surplus office floorspace and airspaces above relatively low density commercial uses, especially in locations with good public transport accessibility. Such sources could accommodate a variety of uses including storage, offices, community uses as well as flats.

**6.51** In line with NPPF paragraph 23, the Council recognises that residential development can play an important role in ensuring the vitality of town centres. Housing development can not only help to meet housing need, but also function to support town centres by generating footfall. Housing can also make better use of underused, surplus and vacant town centre buildings, including spaces above relatively low density commercial uses.

**6.52** Mixed-use development in town centres may often involve the intensification and expansion of sites. Proposals for intensified mixed-use town centre development will need to have regard to London Plan Policy 2.15 and demonstrate that the development can be supported by high levels of public transport accessibility and lower levels of car dependency, in line with London Plan Policy 3.4.

**6.53** Proposals for residential development in town centres which adversely impact on the function and appearance of the designated frontages and the town centre will be resisted by the Council, including proposals for the conversion of ground floor retail units to residential accommodation within designated town centre frontages.

## Managing clusters of town centre uses

### POLICY DM46: BETTING SHOPS

- A** Proposals for betting shops will only be permitted where:
- a** They are appropriately located within the Metropolitan Centre, a District Town Centre or Local Centre, having regard to Policy DM42 (Primary and Secondary Frontages) and DM43 (Local Shopping Centres); and
  - b** The total number of betting shops (including extant planning permissions) will not exceed 5% of the units within the town or local centre.

**6.54** The policy seeks to manage the proliferation and overconcentration of betting shops, which has emerged as an important local issue.

**6.55** The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of betting shops. It concludes there is sufficient evidence to demonstrate that access to gambling venues, including betting shops, leads to increased gambling behaviour and that this, in turn, is associated with poor health outcomes.



Betting Shop

**6.56** The Council is committed to improving the health and well-being of its residents along with visitors to the Borough. In light of the above evidence base, it is considered appropriate for the Local Plan to seek to manage betting shops. The policy approach is in conformity with London Plan Policy 4.8, which encourages local authorities to set policies to manage clusters of uses having regard to their positive and negative impacts. This includes the impact on a town centre's vitality and viability, contribution to sense of place, as well as community safety, health and well-being.

**6.57** The Council considers that the five percent threshold allowance for betting shops in town centres is reasonable to support economic development and meet demand for this use, whilst protecting against the adverse impacts that an overconcentration of betting shops can have on the vitality and viability of town and local centres.



## POLICY DM47: HOT FOOD TAKEAWAYS

- A The council will resist proposals for hot food takeaway shops located within 400 meters of the boundaries of a primary or secondary school.
- B Subject to (A) above, proposals for hot food takeaway shops will only be permitted where:
  - a The percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in the Metropolitan and District Town Centres and local centres;
  - b Within neighbourhood parades, other non-designated frontages and elsewhere in the Borough, it is suitably demonstrated that the proposal will not result in an overconcentration of hot food takeaways;
  - c It can be demonstrated that there will be no adverse impact on the vitality and viability of the centre;
  - d There is no unacceptable impact on the amenity of neighbouring uses, either adjacent to and surrounding the development; and
  - e Access, servicing and parking arrangements do not result in an adverse impact on the safety of pedestrians and traffic flows or cause unacceptable increases to traffic and parking.
- C The Council may impose conditions on any planning permission granted for a hot food takeaway to ensure appropriate control over noise, vibration and odours, waste management, hours of operation and community safety.

**6.58** The policy seeks to manage the proliferation and overconcentration of hot food takeaways, which has emerged as an important local issue.

**6.59** The Public Health Directorate has published a Health Evidence Base (2012) to inform preparation of Haringey's Local Plan. This highlights the link between health outcomes and the proximity of hot food takeaways. The evidence identifies a correlation between the distribution of hot food takeaways in Haringey and levels of overweight and obese children across the Borough.

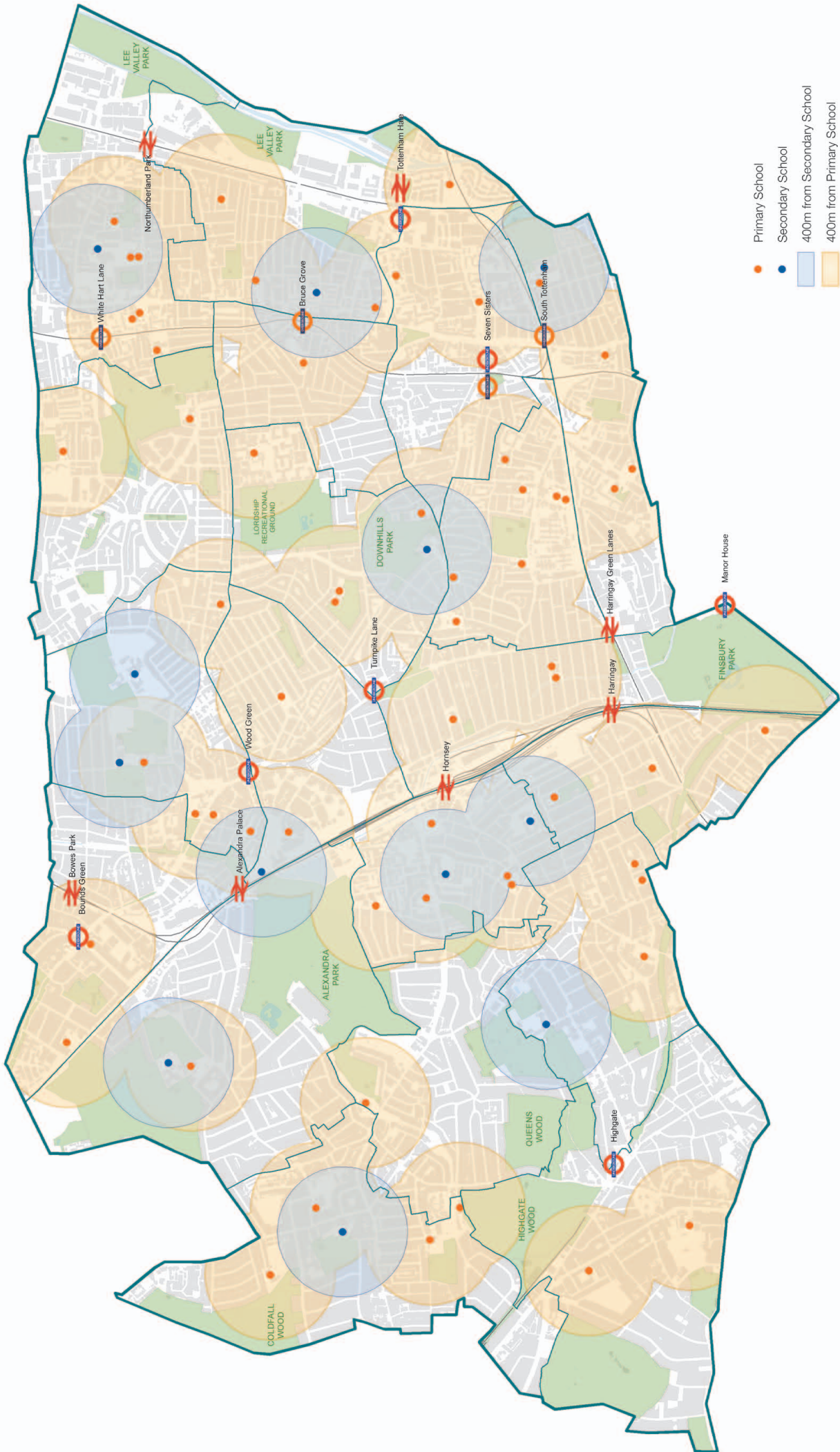
**6.60** In light of the above evidence base, it is considered appropriate for the Local Plan to seek to manage the development of hot food takeaways, particularly around primary and secondary schools where they pose a significant health risk to children. The policy approach is in conformity with London Plan Policy 4.8, which encourages local authorities to set policies to manage clusters of uses having regard to their positive and negative impacts. This includes the impact on a town centre's vitality and viability, contribution to sense of place, as well as community safety, health and well-being.

**6.61** The Council considers that the five percent threshold allowance for hot food takeaways in town centres is reasonable to support economic development and meet demand for this use, whilst protecting against the adverse impacts that an overconcentration of this use can have on the vitality and viability of town and local centres.

**6.62** To assist with implementation of this policy, the Council has mapped a "Healthy Eating Zone" (Figure 6.1) which reflects the extent of the 400 metre exclusion area around schools for hot food takeaways. This map may be revised over time to reflect changes in education provision across the Borough.

FIGURE 6.1

Healthy Eating Zones



# **Community Infrastructure, Implementation & Monitoring**

CHAPTER

# **07**

# Community Infrastructure, Implementation & Monitoring

## 07

- 7.1** Community infrastructure (also referred to as social infrastructure) is an all encompassing term which includes facilities such as schools, libraries, health facilities, cultural and religious facilities as well as parks, open spaces and recreation areas.
- 7.2** Community infrastructure is integral to sustainable communities, promoting social interaction and enhancing the quality of life within a community. The provision of core public services as well as the provision of shops, pubs, cafes and burial spaces can be an important part of the long term sustainability of an area and key infrastructure. The provision of good quality open and public space is also crucial to successful neighbourhoods.
- 7.3** For the purpose of this policy 'community infrastructure' should be taken to include facilities generally available to and used by the local community at large for the purposes of leisure, social interaction, health and wellbeing or learning. This will include, but not be confined to, community centres, premises for indoor sport, leisure and cultural centres, places of worship, doctor's surgeries/ health centres, public houses, crèches, playgroups, libraries, schools and other training and educational facilities.

### **POLICY DM48: USE OF PLANNING OBLIGATIONS**

- A Proposals that fail to make adequate provision for affordable housing, infrastructure and other requirements such as essential site-specific transport infrastructure, and employment contributions made necessary by the development, either through appropriate on-site provision or a planning obligation, will be refused.

- 7.4** Development in Haringey must be supported by new and improved facilities to meet the needs of the community. As part of determining planning applications the Council may seek to enter into agreements with developers where infrastructure is required to address the impact of development proposals.
- 7.5** The purpose of planning obligations is to make development acceptable in planning terms. Planning obligations will be sought to compensate and/or mitigate the impact of a development, which without that mitigation, would render the development unacceptable in planning terms.
- 7.6** This is about mitigation, rather than just identification, of any undesirable impact and is generally negotiated during the consideration of a planning application on a case by case basis.
- 7.7** Reduced contributions, where necessary (for example due to the exceptional costs of redeveloping a particular site) will be negotiated on an 'open book' basis based on the financial viability of the scheme.
- 7.8** The Council's Planning Obligations SPD (October 2014) provides guidance on the types and scale of planning obligations that are likely to be sought as a result of applying the Development Plan policies relevant to Haringey. The SPD also sets out the Council's expectations of the processes to be applied in the securing of appropriate obligations.
- 7.9** The funding to deliver a range of strategic infrastructure projects that support residential and economic growth in the Borough will be generated through the collection of Haringey's Community Infrastructure Levy (CIL). These projects are identified in the Infrastructure Delivery Plan (IDP), and prioritised through the Council's budget setting process and publicised on the Council's Regulation 123 list.

### **POLICY DM49: MANAGING THE PROVISION AND QUALITY OF COMMUNITY INFRASTRUCTURE**

- A The Council will seek to protect existing social and community facilities unless a replacement facility is provided which meets the needs of the community.
- B Where a development proposal may result in the loss of a facility, evidence will be required to show that:
- a The facility is no longer required in its current use;
  - b The loss would not result in a shortfall in provision of that use; and

c The existing facility is not viable in its current use and there is no demand for any other suitable community use on the site.

C The evidence should also provide relevant accounts and marketing information demonstrating that the premises has been marketed for use as a community facility for a reasonable length of time (minimum 12 months) and that no suitable user has been/or is likely to be found.

D The Council will consider supporting the consolidation of equal or enhanced provision to meet an identified need.

E Proposals for new and extended social and community facilities and the sharing of facilities will be supported by the Council provided they:

a Are accessible by public transport, walking and cycling, preferably in town centres or local centres, growth areas or areas of change;

b Are located within the community that they are intended to serve;

c Provide flexible, multifunctional and adaptable space, where practicable;

d Do not have significant adverse impact on road safety or traffic generation; and

e Protect the amenity of residential properties.

F Major Developments may be required to accommodate new infrastructure as part of mixed use proposals where feasible, where an acute deficiency is identified through the Infrastructure Delivery Plan.

G Consideration should be given to the Council's Infrastructure Delivery Plan, and identify and plan for opportunities to provide local facilities on site and/or connections to existing facilities adjacent or close to the development site.

H Development proposals in locations where new infrastructure is planned must be compatible with, and provide the necessary safeguards and network links for, the future infrastructure project.

**7.10** Haringey's Local Plan Policy SP16 states that the Council will work with its partners to ensure the much needed infrastructure and community facilities and services are provided for local communities. Existing facilities will be protected and where possible, enhanced. This will be based on the projects identified in the Council's Infrastructure Delivery Plan (IDP).

**7.11** Infrastructure needed to support Haringey's population over the Plan period, and deliver the spatial strategy, will be delivered through a combination of private and public sector investment, including through the use of the Community Infrastructure Levy (CIL) funding and planning obligations. Significant development sites are likely to come forward over the next 15 years,

particularly in Haringey's Growth Areas and Areas of Change, and these sites may provide opportunities for provision of community infrastructure. The Site Allocations DPD and Area Action Plans help to identify requirements and considerations for infrastructure within specific sites and areas. Discussions with relevant service providers and stakeholders have helped to inform the identification of needs and site-specific requirements.

**7.12** The Haringey CIL was adopted in July 2014, and implemented from 1<sup>st</sup> November 2014. Receipts from CIL will help fund new infrastructure in accordance with the Council's infrastructure priority list, which is set out in the IDP. CIL is charged on a per square metre basis on most new developments and can be spent on new infrastructure across the Borough. Infrastructure can also be secured from new development through Section 106 agreements generating local infrastructure improvements on or close to the new developments. CIL rates are currently constrained by viability, so as land values change in the Borough, CIL rates will be reviewed.

**7.13** The physical, social and environmental infrastructure that can be progressed via CIL or Section 106 includes the following:

- Education/training facilities;
- Health Facilities;
- Community Halls/centres;
- Emergency services, including drop in police stations;
- Highways and footway reinstatement and road improvements;
- Public realm improvements;
- Utilities infrastructure;
- Telecommunications infrastructure;
- Neighbourhood combined heat and power networks;
- Decentralised energy networks; flood defences including local drainage improvements;
- Micro, small or affordable workspace or retail spaces; and
- Construction placements and procurement from local firms.

**7.14** Haringey's Planning Obligations SPD (2014) provides guidance setting out the methods by which financial contributions will be required in new developments.

**7.15** Critical decisions on planning applications to gain, lose or transfer infrastructure will need to be made in light of assessments of needs in specific locations and evidence that the provision is no longer needed. It is recommended that lack of need is demonstrated through an active marketing exercise which should reflect the type of provision, its state and location. Normally the exercise should be for a minimum period of 6 - 12 months, depending on perceived demand and market conditions.

- 7.16** Sites currently in community use can often come under pressure for redevelopment. The consolidation and modernisation of community facilities in accessible locations where multi-functional facilities can meet the needs of a range of users will be considered. This process, as well as the disposal of surplus or redundant assets will need to be managed to ensure that critical uses are not lost from the local area.
- 7.17** The loss or change of use of existing community facilities will be acceptable if it is shown that the disposal of assets is part of a wider programme to deliver public services and related infrastructure. Such a programme will be required to demonstrate that the facility under consideration is neither needed nor viable, and that adequate facilities are, or will be made available to meet the ongoing needs of the local population. In such cases no accounts or marketing information will be required.
- 7.18** The Localism Act 2011 introduced the listing of Assets of Community Value (ACV), nominated by community and voluntary bodies, and which are assessed and agreed by the Local Planning Authority and placed on a list. Whilst the designation is important, and indicates the community value placed on a community use, it is not an objective assessment of community value and would be inappropriate to treat the designation as a material consideration. Nevertheless, development proposals which affect a listed ACV are required to consult the local community to ensure that new and enhanced community facilities of all types, best meet their needs and aspirations. The value of an ACV is assessed objectively on a case-by-case basis. For further details please see the Council's webpage.

## POLICY DM50: PUBLIC HOUSES

- A** The Council will resist proposals for redevelopment or changes of use to non-permitted uses that will result in the loss of a public house, unless it can be demonstrated that:
- The public house is no longer financially viable, as set out through a thorough marketing campaign;
  - All feasible options for re-provision of the public house on site have been explored; or
  - The redevelopment of the site would secure an over-riding public benefit.
- B** Any permitted change of use from Use Class A4 involving the alteration and/or the extension of a public house must ensure any proposed alteration does not affect the viability of the pub, the vitality of the area, detract from the character and appearance of the building and the street scene and any significant features of historic or character value are retained and, where possible, enhanced.



Pub, Highgate

- 7.19** Public houses are an important community asset. They are often closely associated with the life and identity of local communities, providing hubs for social interaction and venues for community functions, including informal meeting places for community groups. As such, public houses can contribute greatly to social cohesion, especially in residential neighbourhoods. They also help to support and promote the evening economy, enhancing the vitality of residential neighbourhoods and town centres.
- 7.20** Public houses can also act as repositories of social history and, if they are buildings of historic interest, can be valued heritage assets, forming an integral part of the streetscape. In recent years Haringey has experienced a steady decline in their provision, with many long-established public houses being converted to other uses or demolished altogether, often without the need for planning permission. Consistent with the NPPF, the Council considers that public houses are community facilities, and in accordance with Strategic Policy SP16, seeks to safeguard against their unnecessary loss.
- 7.21** In order to demonstrate a public house is unviable, applications proposing the loss should provide the following evidence of:
- Patronage levels and trading accounts over the past 4 years or from previous management;
  - The actions taken by the owner/operator to respond to falling profits/patronage, including maintenance, refurbishment and an evaluation of the potential for expansion, contraction and diversification;
  - Suitable marketing activity of the business as an on-going concern over the past 12 months; and
  - Adequate provision of public houses serving the local area.



- 7.22** The potential loss of a public house within a town centre will also need to be considered in relation to Policies DM42, DM43 and DM44 where it is likely to affect the vitality, viability or diversity of the centre concerned.
- 7.23** Assessing development proposals involving the loss of public houses listed as Assets of Community Value, should have regard to other relevant policies.

## **POLICY DM51: PROVISION OF DAY NURSERIES AND CHILD CARE FACILITIES**

- A** The Council will only grant planning permission for day nursery schools, childminding, playgroups and related activities in residential dwellings (excluding flats) provided that:
- a The proposal does not result in the loss of a dwelling;
  - b The floorspace occupied by the activity is ancillary to the dominant residential use;
  - c The noise generated by activity would not adversely affect the amenities nearby properties;
  - d The activity would not adversely affect the character of the surrounding area or result in the loss of privacy of neighbouring properties;
  - e Traffic movements and parking arrangements of parents/carers and staff do not detrimentally affect road safety or traffic generation; and
  - f The property can accommodate satisfactorily the number of children proposed.
- B** The Council will expect all planning applications for day nurseries and child care facilities in residential buildings and other non-residential buildings to outline:
- a The numbers of staff and other visitors expected to attend the facility;
  - b The days of the week and the hours when the facility will operate;
  - c The nature of the activity;
  - d The car parking and transport patterns, including servicing of the use;
  - e Disabled access in and around the building to promote access for all; and
  - f The steps taken to minimise the noise impact of such uses.

- 7.24** The Council recognises the value and importance of provision of suitable day care facilities for pre-school children. Demand for a range of such facilities, operated either from dwellings or other premises, is likely to increase over the Plan period. To ensure that basic standards are maintained, the Council will seek to ensure that all facilities are appropriately located, in particular to protect the amenity of the neighbouring properties and the wider area. Consistent with the housing policies of this Plan, any proposal involving the loss of housing will be resisted.



*Tottenham Churchyard*

## **POLICY DM52: BURIAL SPACE**

- A** The Council will protect all existing burial spaces and seek to re-use existing spaces for new burial spaces where appropriate
- B** In determining any application for the provision of new burial spaces, applications should demonstrate the following:
- a The provision meets the burial requirements of the various ethnic and religious groups within the Borough;
  - b The spaces are located within close proximity to the communities served by spaces to reduce the travelling distance to visit the deceased; and
  - c Any affect on the water table and the possibility of flooding or water logging cause by the new provision is minimised.

- 7.25** Meeting the needs of people at all stages of their lives, including arrangements following death, is an important element of a successful community. Increased preference towards cremation has reduced the demand for burial spaces across London. Nevertheless Haringey's growing diverse population is likely to result in an increased demand for burial spaces to meet, in particular, the requirements of ethnic and religious groups for whom burial is the only option.

- 7.26** In 2011, the Mayor of London published an assessment of burial capacity in London which demonstrated Haringey has 23.4 ha of burial land and a need for 8,961 graves between 2011 and 2031. There is no statutory duty for the Council to provide burial spaces, however, it is required to maintain its existing cemeteries, and as such the policy provides the protection of existing burial spaces in the Borough.
- 7.27** The Council will work with the Mayor, neighbouring authorities, cemetery providers and other key stakeholders to protect existing burial spaces and to promote and examine the potential for re-using graves or to identify opportunities for new provision. The concept of re-using burial spaces is actively encouraged by the London Plan and both Section 74 of the London Local Authorities Act (2007) and Section 25 of the Burial Act (1857) allow the re-use of graves in certain circumstances.

## **POLICY DM53: HOTELS AND VISITOR ACCOMMODATION**

- A** Hotels and other visitor accommodation are generally appropriate in locations within an existing town centre or at a location well served by public transport.
- B** In these locations proposals for new hotel and visitor accommodation will only be supported where they:
- Do not result in adverse impacts on residential amenity, including cumulative impacts;
  - the proposal does not result in the loss of housing;
  - Provide appropriate arrangements for pick up / drop off, service delivery vehicles and coaches, appropriate to the size of the hotel or visitor accommodation;
  - Provide an adequate standard of amenity for occupants;
  - Are inclusive, providing at least 10% of all hotel rooms to wheelchair accessible standards (the 10% wheelchair accessible standard rooms must be fully fitted from occupation);
  - are not permanently occupied;
  - Where appropriate, incorporate ancillary facilities which are open for public use and create employment opportunities for local residents, such as restaurants, gyms and conference facilities; and
  - Where appropriate, create active frontages on the ground floor.

- 7.28** Hotels and visitor accommodation can create employment and economic activity both directly and indirectly. Haringey's location within the capital, including its rapid links to central London, provides an opportunity to support London's tourist industry while benefiting at a local level from increased visitors and job growth. The preferred location for hotels and visitor accommodation is in or close to town centres. Most importantly, care must be taken to ensure that they are at least well served by public transport. Proposals should not have an adverse impact on the environment by reason of noise, disturbance, traffic generation, exacerbation of parking problems, or detract from the character of the area. In general the local need for uses should be assessed in light of a strong presumption against the loss of residential accommodation.

- 7.29** The policy is intended to draw a distinction between apart-hotels and hotels which result in very different impacts. Permanent apart-hotel accommodation is considered to be C3 accommodation unless the lease lengths are controlled by planning condition which would be specified as an absolute minimum to distinguish its level of permanency. Other characteristics which would indicate the level of permanency could include: the presence of onsite staff / management; the presence of reception, bar or restaurant; provision of cleaning and administrative services; or ownership of units / ability to sell on open market. Planning applications demonstrating a distinction of permanency should consider these characteristics. Permanent C3 apart-hotel accommodation is not hotel or visitor accommodation and should be assessed via the other policies of the plan as they can often result in unsustainable development and put pressure on local services and infrastructure in the same ways as C3 accommodation.

## **POLICY DM54: FACILITATING TELECOMMUNICATIONS DEVELOPMENT**

The Council will promote the development of advanced, high quality communications infrastructure to support economic growth and more accessible, inclusive communities. This will be achieved by requiring new development proposals to:

- Be designed in such a way as to be capable of facilitating delivery of high speed broadband technology;
- Demonstrate how they will improve communications infrastructure in areas of poor broadband connectivity, as identified in Haringey's Infrastructure Delivery Plan, including through connection of the development to a nearby trunk network; and

- c Deliver “ultrafast” connections in Regeneration Areas; and
- d Be designed to meet the requirements of Policy DM3.

- 7.30** The NPPF requires the Council to facilitate telecommunications development, including high speed broadband technology as essential for sustainable economic growth and in enhancing the provision of local community facilities and services, while ensuring as far as possible that any visual impact of the structure on valued features of the Borough’s environment is minimised.
- 7.31** The Council will seek to ensure that all new development, and wherever possible all residents and businesses in the Borough have at least superfast (i.e. above 24MB/s in 2015 speeds) speeds of internet connectivity. There are currently areas of the Borough that have slow (i.e. below 10MB/s in 2015 speeds) speeds of internet connectivity. A live version of this map, and updates to the contemporary “superfast” and “ultrafast” internet speeds are included in the Infrastructure Delivery Plan.
- 7.32** Additionally, in areas in which the Council is proposing new workspace as a part of new development, “ultra-fast” (above 100MB/s and up to and beyond 1GB/s connections in 2015 speeds as technology allows) is considered to be a precondition of attracting knowledge-based firms into the Councils identified Regeneration Areas.
- 7.33** The Council expects developers to co-operate and contribute to the provision of high quality telecoms infrastructure. This will be delivered through partnership with an appropriate infrastructure delivery partner.

## POLICY DM55: REGENERATION / MASTERPLANNING

- A** Where development forms part of an allocated site, the Council will require a masterplan be prepared to accompany the development proposal for the wider site and beyond, if appropriate, that demonstrates to the Council’s satisfaction, that the proposal will not prejudice the future development of other parts of the site, adjoining land, or frustrate the delivery of the site allocation or wider area outcomes sought.
- B** In preparing their proposal and the wider site masterplan, the Council expects the applicant to have engaged with and sought the views of the landowner(s) and occupiers of the other part(s) of the allocated site and, where appropriate neighbouring properties.

- 7.34** To ensure the spatial vision for the Borough is achieved, Policy DM56 seeks to ensure all development proposals submitted to the Council proactively respond to the vision and ensure the spatial vision of the Local Plan is achieved. At the same time, the Council also has a responsibility to proactively work with landowners, local communities and other parties to help deliver the aims of the Plan. The programme for growth is ambitious but with the support from the Mayor of London, the community, stakeholders, and the development industry, the vision for the Borough will be realised. DM56(B) provides the Council’s commitment to helping facilitate and delivery the necessary change.
- 7.35** Private and public investment will be key to delivering the ambitious regeneration vision for the Borough. The Housing Zone in Tottenham is one example of investment which will contribute significantly to delivering the aims of the Plan. The housing zone monies will direct important investment into the AAP area supporting transport and public realm improvements which will benefit existing and future residents of Tottenham. Development will be expected to harness the benefits of such investment and maximise the opportunities this presents which could lead to more sustainable development outcomes. Another such example will be Crossrail which will redefine the accessibility levels of parts of the Borough. Developers and the Council should utilise this to optimise housing delivery and more effectively meet the objectives of the Local Plan.
- 7.36** Ensuring development proposals are designed and submitted to Haringey as part of wider comprehensive and co-ordinated developments will help to alleviate concerns associated with piecemeal development, and ensure that new development maximises benefit locally. The aim is to ensure landowners are talking to each other and are aware of the shared vision for the area, including the sites allocated for important infrastructure projects. Haringey Council wants to ensure development proposals do not prejudice each other, or the wider development aspirations for the Borough. Comprehensive redevelopment which is designed in consultation with the Council is likely to result in a faster planning consent being granted and will avoid any undue delays in the planning process, to the benefit of everyone involved.
- 7.37** Particular areas in which masterplans will be required in order to demonstrate that proposals
- Sites within the emerging Tottenham Hale District Centre to ensure a coherent Centre is created;
  - Estate Renewal projects in which developments will need to be co-ordinated and community consultation held;
  - Larger sites on which there are multiple landowners in order to ensure that proposals are not prejudicing development of the remaining parcels (including those with extant planning consent);
  - Sites which fall within the Borough’s Warehouse Living Areas (see Policy DM39).

**TABLE 7.1: Example Sites with requirements for comprehensive development**

Tottenham Hale District Centre	Large/Complex Sites
Station Square West	Gourley Triangle
Station Square North	Apex House
Tottenham Hale Retail Park	Wards Corner
Tottenham Hale Station	Tottenham Hotspur Stadium
	Hale Village
Estate Renewal Sites	North of White Hart Lane
Turner Ave & Brunel Walk	Alexandra Palace
Northumberland Park North	Station Rd Offices/ Wood Green Bus Garage
Northumberland Park	Finsbury Park Bowling Alley
High Rd West	Myddleton Rd Local Centre
Park Grove & Durnsford Rd	Clarendon Square
Broadwater Farm Area	Wood Green Cultural Quarter (North/South/East)
Leabank & Lemsford Close	Clarendon Rd South
Hillcrest	Clarendon Gateway
Warehouse Living Sites	16-54 Wood Green High Rd
Constable Crescent	L/b Westbury & Whymark Aves
Fountain Rd	Arena Retail Park
Arena Design Centre	Highgate School
Omega Works	Highgate Bowl
Vale/Eade Rds	The Roundway
Eade/Overbury Rds	Barber Wilson

7.69 A comprehensive approach to development will often be in the public interest within the Borough. Whilst incremental schemes might be more easily delivered, the constraints posed by site boundaries, neighbouring development or uses, and below-ground services all have potentially limiting consequences for scale, layout and viability. Across the Borough as a whole, such consequences could depress the optimum use of land, the proper planning of development (in terms of layout, design, use etc) and the ability of development to support the achievement of wider regeneration initiatives or objectives.

7.70 The necessity to use compulsory purchase powers is more likely on sites with more complicated issues, which have land in multiple ownerships. These sites are set out in Table 1. These sites are considered to be the ones most likely to require Compulsory Purchase powers to be used. It is possible that other occasions may come forward that require site assembly to be carried out by the Council on sites other than those set out in Table 1.

## Monitoring

7.71 Haringey's adopted Strategic Policies Local Plan sets out the framework for monitoring the performance of local planning policies. Monitoring is necessary to measure progress on key objectives and to ensure effective delivery of the Local Plan. Performance of the Development Management DPD will be considered against the indicators and targets set out in the Strategic Policies monitoring framework, where relevant. The targets and indicators may change over the course of the plan period in order to respond to changes in national or regional policy and to ensure capture of the most reliable sources of monitoring information. Progress and performance outcomes will be published annually in the Authority Monitoring Report.

7.72 The Council will also monitor government and London wide policy and changes in legislation to make sure that the Development Management DPD continues to be consistent with relevant national, regional and local planning policies, and to identify any need to review or reassess the approach taken in the Plan.

7.73 Planning decisions will be crucial to ensuring that new development appropriately responds to the Plan's objectives and ultimately supports delivery of Haringey's spatial strategy. The Authority Monitoring Report will therefore include information on planning performance with respect to the handling of planning applications. The Council will also take account of relevant supplementary planning guidance and documents when determining planning applications.

7.74 The Development Management DPD will play a role in helping to ensure that new development and growth is appropriately supported by strategic and community infrastructure. Haringey's Infrastructure Delivery Plan (IDP) helps to identify key service areas where investment will be needed to support the additional demand from growth, and the DM Policies set out requirements in this regard. The IDP will be updated over the plan period and, where relevant, progress updates will be set out in the Authority Monitoring Report.

## POLICY DM56: SUPPORTING SITE ASSEMBLY

A The Council will support land assembly to achieve comprehensive and co-ordinated development, and will use compulsory purchase powers, only where necessary, to assemble land for development within the borough where:

- a Landowners and developers can demonstrate that they have:
  - i A viable, deliverable and Local Plan compliant scheme; and
  - ii Have made all reasonable attempts to acquire, or secure an option over, the land/building(s) needed, through negotiation.
- b Comprehensive redevelopment of the assembled site is required to deliver the site's allocation (including the requirements of a Masterplan where stated in the Plan); and
- c The development proposed for the assembled site would contribute to the delivery of the Local Plan's objectives.

B Where compulsory purchase is necessary, applicants will be required to demonstrate how the associated costs impact upon development viability.

# Appendices

CHAPTER

08

## Appendix A: Schedule of Locally Significant Views

(To be read in conjunction with Figure 2.3)

**TABLE 2: Schedule of Locally Significant Views**

Ref #	Viewing place and assessment point from - - - to	Type of view e.g. Panorama Linear River prospect Townscape Landmark vista	Source	Level and Importance (RAG)
<b>1998 Unitary Development Plan</b>				
1	Twyford Avenue - - - > across Fortis Mere School playing fields to Enfield	Panorama	1998 UDP	Local view
2	Alexandra Palace - - - - > to Highgate Ridge	Panorama	1998 UDP	Local view
3	Cranley Gardens - - - - > view along street and backdrop to West Green beyond	Linear	1998 UDP	Local view
4	Parkland Walk, bridge over St James Lane - - - - > Crouch End valley, ridge and central London landmarks beyond	Linear	1998 UDP	Local view
5	Archway Road north - - - - > Archway Bridge	Linear	1998 UDP	Local view
6	Archway Road south - - - - > Archway Bridge	Linear	1998 UDP	Local view
7	Ferne Park Road at junction of Ridge Road - - - - > Alexandra Palace	Linear	1998 UDP	Local view
8	Ridge Road at junction of Denton Road - - - - > Alexandra Palace	Linear	1998 UDP	Local view
9	Alexandra Park Road at junction Curzon Road and Windermere Road - - - - > to Enfield and Lea Valley	Linear	1998 UDP	Local view
10	Alexandra Palace - - - > Broomfield Park and beyond	Panorama	1998 UDP	Local view
<b>2014 Urban Characterisation Study</b>				
1	Hampstead Lane - - - - > view along the lane and towards Highgate village – glimpses between buildings	Townscape	2014 Urban Characterisation Study	Local view
2	Highgate Hill - - - - > view south towards Emirates and Central London	Linear	2014 Urban Characterisation Study	Local view
3	Alexandra Palace - - - - > Crouch End Ridge line	Panorama	2014 Urban Characterisation Study	Local view
4	Station Road, New Southgate - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
5	Broomfield Park - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
6	Bounds Green Road railway bridge - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view

Ref #	Viewing place and assessment point from - - - to	Type of view e.g. Panorama Linear River prospect Townscape Landmark vista	Source	Level and Importance (RAG)
7	Devonshire Road, corner of Devonshire Hill Lane - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
8	Lordship Lane at Bruce Castle - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
9	Watermead Way railway bridge - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
10	Downhill Park Road - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
11	Adams Road - - - > Alexandra Park	Linear	2014 Urban Characterisation Study	Local view
12	Corner of Seven Sisters Road, Amhurst Park and Eade Road - - - > Alexandra Palace	Linear	2014 Urban Characterisation Study	Local view
13	View along Inderwick Road	Townscape	2014 Urban Characterisation Study	Local view
14	View along Nelson Road	Townscape	2014 Urban Characterisation Study	Local view
15	Queenmore Road, Stapleton Hall Road junction - - - > Seven Sisters and Hale Village	Linear	2014 Urban Characterisation Study	Local view

## Appendix B: Article 4 Directions for Historic Environment

**TABLE 3: Article 4 Directions for Historic Environment**

Area	Addresses Covered	Types of development for which permission is required
TOWER GARDENS	Awfield Road; Ballioll Road; Bennington Road; Cheshunte Road; Cumberton Road; De Quincey Road 1-31,2-30; Kevelioc Road; Lordship Lane 132-458(even); Risley Avenue 1-203,2-266; Shobden Road; Siward Road; Spigurnell Road; Teynton Terrace 1-31, 2-36; Topham Square; Tower Gardens Road; Turnant Road rear of the Roundway and Walden Rd; Waltheof Avenue; Wateville Road.	<ol style="list-style-type: none"> <li>1 Enlargements improvements and alterations to the front of a house or any side facing a road.</li> <li>2 Erection or alterations to porches outside any external door.</li> <li>3 A hardstanding for a vehicle in a garden.</li> <li>4 Gates, walls, or other means of enclosure in front of the building or facing a highway.</li> <li>5 Painting any exterior brickwork, rendering or pebble dashing at the front or side.</li> </ol>
NOEL PARK	Ashley Crescent; Darwin Road 1-47, 2-48; Farrant Avenue; Gladstone Avenue 35a-287, 60-276; Lymington Road 31-235, 42-300, Noel Park School, St Marks Church Hall and Vicarage; Morley Avenue; Moselle Avenue; Salisbury Road 19-81, 2-56; Vincent Road 1-49, 2-46.	<ol style="list-style-type: none"> <li>1 Enlargements improvements and alterations to the front of a house or any side facing a road.</li> <li>2 Erection or alterations to porches outside any external door.</li> <li>3 Construction of any gates, fences, walls, or other means of enclosure or alteration or maintenance of these if they are in front of the building or facing a highway.</li> <li>4 Painting any exterior brickwork, rendering or pebble dashing at the front or side.</li> </ol>
ROOKFIELD ESTATE	Cascade Avenue; Cranmore Way; Etheldene Avenue 43-69 and 76-88; Muswell Hill 1-33 odd, 6; Hollybank; Hollybank cottage and garages; Grove Lodge and Victoria Public House; Park Road 205-209 odd; Rookfield Avenue; Rookfield Close; St.James's Lane 89-131, 108-132; The Chine; The Court.	<ol style="list-style-type: none"> <li>1 Enlargements, improvements and alterations to houses.</li> <li>2 Erection or alterations to porches outside any external door.</li> <li>3 A hardstanding for a vehicle within the curtilage.</li> <li>4 Construction of any gates, fences, walls, or other means of enclosure or alteration or maintenance of these if they are in front of the building or facing a highway</li> <li>5 Painting any exterior brickwork or rendering.</li> </ol>

Area	Addresses Covered	Types of development for which permission is required
PEABODY COTTAGES	Peabody Cottages: Nos. 1A, 1B and Nos. 1 to 12 (consecutive); Nos. 14 to 19 (consecutive); Nos. 43 to 50 (consecutive); Nos. 52 to 151 (consecutive); Lordship Lane: Nos. 80-130 (even).	<ol style="list-style-type: none"> <li>1 Enlargements, improvements, removal or other alterations to the street elevations</li> <li>2 Alteration to the roof slope fronting a street</li> <li>3 Erection or alteration of porches outside any external door facing the street</li> <li>4 Formation of hardstanding within a garden area fronting a street</li> <li>5 Installation, alteration or replacement of a satellite antenna or any part fronting the street</li> <li>6 Erection, alteration or removal of a chimney</li> <li>7 Demolition, erection, construction, improvement or alteration of a gate, fence, wall or other means of enclosure to the street frontage</li> <li>8 Painting of the exterior (except windows, window frames, doors and door frames)</li> <li>9 Demolition of any part of the street elevations or street boundaries</li> </ol>

## Appendix C: Town Centre Primary and Secondary Frontages

**TABLE 4: Town Centre Primary Frontages**

Centre	Address
Wood Green Metropolitan Centre, N22	1-133 (odd) High Road, 2-74 (even) High Road 1-14 (cons) Cheapside, 1-9a (odd) Westbury Avenue 106 Alexandra Road Shopping City complex (including High Road frontages) Creation of new primary frontages through SA11 Wood Green Library (187-197A Wood Green High Road)
Crouch End District Centre, N8	1-61 (odd) The Broadway 6-8 (even) The Broadway 26-54 (even) The Broadway 1-26 (cons) Broadway Parade 1-44 (cons) Topsfield Parade 1-9 (odd) Park Road 2-24 (even) Park Road 1-4 Broadway House
Green Lanes District Centre, N4	1-80 (cons) Grand Parade 407-575 (odd) Green Lanes
Muswell Hill District Centre, N10	1-333 (odd) Muswell Hill Broadway 36-264 (even) Muswell Hill Broadway 318-420 (even) Muswell Hill Broadway 2-20 (even) Fortis Green Road (Sainsbury, Muswell Hill)
Tottenham High Road/Bruce Grove District Centre, N17	444-554 (even) High Road 467-549 (odd) High Road
West Green Road/Seven Sisters Road District Centre, N15	1a-95 (odd) West Green Road 2-110 (even) West Green Road 227-261 (odd) High Road 220-224 (even) High Road 230 High Road (Tesco Seven Sisters) Primary frontage between 70 to 110 (even) and 51-95 (odd) West Green Road transferred to secondary frontage through SS1 Seven Sisters and West Green Rd District Centre
Finsbury Park District Centre	Creation of new primary frontage from the corner of Seven Sisters Road (number 263) to 10 (even) Stroud Green Road through SA36 Finsbury Park Bowling Alley
Tottenham Hale District Centre	Creation of new primary frontage through TH1 District Centre in Tottenham Hale and where appropriate through TH2-TH5



**TABLE 5: Town Centre Secondary Frontages**

Centre	Address
Wood Green Metropolitan Centre, N22	<p>Secondary frontage (south)</p> <p>17-35 (odd) Westbury Avenue</p> <p>1-9 (cons) Turnpike Parade, Green Lanes including Cinema</p> <p>2-8 (even) Westbury Avenue,</p> <p>1-3 (cons) Westbury Arcade,</p> <p>258-278 (even) Langham Road</p> <p>1-4 (cons) Wellington Terrace</p> <p>Adj 1 Wellington Terrace</p>
	<p>Secondary frontage (East)</p> <p>11-25 (odd) Lymington Avenue</p> <p>10-18 (even) Lymington Avenue excluding Community Centre</p> <p>30-32 Lymington Avenue</p> <p>4 Glynne Road</p>
	<p>Secondary frontage (North)</p> <p>136-240 (even) High Road</p> <p>1-19 (cons) The Broadway</p> <p>Library Arcade</p> <p>203-207 (odd) High Road</p> <p>1-11 Station Road</p> <p>Safeway Store and arcade</p> <p>Spouters Corner</p> <p>Creation of new secondary frontages through SA9 Mecca Bingo (707-725 Lordship Lane)</p> <p>Creation of new secondary frontages through redevelopments in Wood Green Metropolitan Town Creation of new secondary frontages Centre at Dovecote Avenue, 7 Cheapside &amp; Lymington avenue through SA13 Bury Road Car Park</p> <p>Creation of new secondary frontages through redevelopments of SA7 Wood Green Bus Garage and SA8 Station Road Offices</p>
Crouch End District Centre, N8	<p>Secondary Frontage (South)</p> <p>126-146 (even) Crouch Hill</p> <p>Floral Hall Crouch Hill</p> <p>2-4 The Broadway</p> <p>147-153 (odd) Crouch Hill</p> <p>1-35 (odd) Crouch End Hill</p> <p>Expansion of secondary frontage through SA3 to include 71 Crouch End Hill</p> <p>2-72 (even) Crouch End Hill</p>
	<p>Secondary Frontage (North/East)</p> <p>27-38 (cons) Broadway Parade</p> <p>45-55 (cons) Topsfield Parade</p> <p>Expansion of secondary frontage through SA3 to include 159 – 165 (odd) Tottenham Lane</p>
	<p>Secondary Frontage (North)</p> <p>2-34 (even) Middle Lane</p>
	<p>Secondary Frontage (North/West)</p> <p>11-59a (odd) Park Road</p> <p>42-48 (even) Park Road</p> <p>68-70 (even) Park Road</p>

Centre	Address
Green Lanes District Centre, N4	Secondary Frontage (South) 329-379 (odd) Green Lanes 385-405 (odd) Green Lanes Creation of new secondary frontage through SA29 Arena Retail Park (390 (even) Green Lanes to the Corner of Williamson Road)
	Secondary Frontage (North) 577-593 (odd) Green Lanes 1-11 (cons) Salisbury Promenade including the Coliseum Salisbury Hotel, Green Lanes 430 Harringay Arena, Green Lanes MacDonald's Restaurant, Williamson Road, N4 444-452 (even) St Ann's Road 570 -572 Green Lanes
Muswell Hill District Centre, N10	Secondary frontage (Fortis Green Road) 22-230 (even) Fortis Green Road 1-121 (odd) Fortis Green Road
	Secondary Frontage (Muswell Hill Road) 107-123 (odd) Muswell Hill Road 2-30 (even) Muswell Hill Broadway
	Secondary Frontage (Muswell Hill Broadway-East) 266-314 (even) Muswell Hill Broadway The Hill PH, 56 Muswell Hill
	Secondary frontage (Muswell Hill Broadway - West) 422-522 (even) Muswell Hill Broadway
Tottenham High Road/Bruce Grove District Centre, N17	Secondary Frontage (Bruce Grove) 1 & 2 Station Buildings, Bruce Grove 1-4 (cons) Bruce Grove 68-119 (cons) Bruce Grove
	Secondary Frontage (High Road North) 551-577 Tottenham High Road 560-592 Tottenham High Road
West Green Road/Seven Sisters Road District Centre, N15	Secondary Frontage (Seven Sisters) 709-723 Seven Sisters Road
	Secondary Frontage (West Green Road) 97-111 (odd) West Green Road 112-126A (even) West Green Road Primary frontage between 70 to 110 (even) and 51-95 (odd) West Green Road transferred to secondary frontage through SS1 Seven Sisters and West Green Rd District Centre
Finsbury Park District Centre	263 to 271 Seven Sisters Road 18b to 52 Stroud Green Road (even) Creation of new secondary frontage through SA36 Finsbury Park Bowling Alley
Tottenham Hale District Centre	Creation of new secondary frontage through TH1 District Centre in Tottenham Hale and where appropriate through TH2-TH5

**TABLE 6: Local Shopping Centres**

#	Centre	Address
1	Alexandra Park Road, N10	88-126 Alexandra Park Road, 111-121 Alexandra Park Road
2	Archway Road N6	247-269 Archway Road 271-395 Archway Road 169 Southwood Lane 162-228 Archway Road 230-258 Archway Road 260-274 Archway Road 306-314 Archway Road

#	Centre	Address
3	Aylmer Parade, N2	22-37 Aylmer Parade 14-21 Aylmer Parade
4	Bounds Green, N11	38-50 Bounds Green Road Latham Court 1-11 Queens Parade 5-7 Brownlow Road 1 Maidstone Road
5	Broad Lane, N15	73-87 Broad Lane 89-103 Broad Lane 2-8 Walton Road 2-8 Victoria Road
6	Commerce Road, N22	4-26 Commerce Road
7	Cranley Parade, N10	37-59 Muswell Hill Road
8	Craven Park Road, N15	109-117 Craven Park Road 1A Elm Park Avenue
9	Crescent Road, N22	1-11, 2-20 Crescent Road 2-26 Palace Gates Road
10	Ferme Park Road, N4	1-23, 2-10 Ferme Park Road, 64/64b/68 Stapleton Hall Road
11	Great Cambridge Road, N17	9-31, 18-56 Great Cambridge Road
12	Green Lanes, N8	643-661 Green Lanes
13	Hermitage Road, N4	285-293 Hermitage Road
14	Highgate High Street, N6	44-90 High Street 2-42 High Street
15	Hornsey High Street, N8	1-67 High Street 2-62 High Street 78 - 106 High Street 1-6 Campsbourne Parade 210-226 Middle Lane
16	Lordship Lane East, N17	134-138, 183-205 Lordship Lane
17	Lordship Lane Roundway, N17/N22	387-483 Lordship Lane 460-520 Lordship Lane 532-576 Lordship Lane
18	Lordship Lane West, N22	608-642 Lordship Lane 1-25 Salisbury Road
19	Lordship Lane Central	342-384 Lordship Lane
20	Midhurst Parade, N10	1-6 Midhurst Parade, Fortis Green
21	Myddleton Road, N22	74-136a Myddleton Road 65-143 Myddleton Road
22	Park Lane, N17	102-126 Park Lane 161-195 Park Lane
23	Park Road/Priory Road, N8	298-316 Park Road 159-187 Priory Road
24	Philip Lane East, N15	176-208 Philip Lane
25	Philip Lane West, N15	187-211, 260-278 Philip Lane
26	Quernmore Road, N4	34-48, 41-47 Quernmore Road
27	Seven Sisters Road, N15	483-531 Seven Sisters Road 600-616 Seven Sisters Road
28	Stroud Green Road North, N4	178-202 Stroud Green Road
29	Stroud Green Road South, N4	74-104 Stroud Green Road
30	Tottenham Lane, N8 (East)	29-99 Tottenham Lane

#	Centre	Address
31	Tottenham Lane, N8 (West)	121-157 Tottenham Lane
32	Tottenham High Road North, N17	793-811, 804-838 High Road 1-21 Northumberland Park Extension of local centre in line with Policy NT5
33	Turnpike Lane	1-137 Turnpike Lane, 60-84 Turnpike Lane, 8-38 Turnpike Lane
34	Westbury Avenue, N22	28-44, 57-79 Westbury Avenue
35	West Green Road Central, N15	293-341 West Green Road 1-9 Vicarage Parade 261-269 West Green Road
36	West Green Road West, N15	432-470, 437-451 West Green Road 410-430 West Green Road
37	Weston Park, N8	85-93, 96a-104 Weston Park 113/5 Inderwick Road
38	Wood Green High Road North, N22	336-362 High Road

## Appendix D: Saved Unitary Development Plan (UDP) Policy Replacement

**8.1.2** The table below shows which policies within the Local Plan: Development Management Policies are proposed to replace those within Haringey's Unitary Development Plan (UDP) Saved Policies.

**8.1.3** The Strategic Policies Local Plan has already replaced many of the previous Saved UDP Policies. A full schedule is included in Appendix 1 of the Strategic Policies Local Plan.

**TABLE 7: Saved Unitary Development Plan (UDP) Policy Replacement**

UDP Policy	Policy Name	Policy Superseded by Local Plan: DM Policies	Policy Name
<b>DEVELOPMENT AND URBAN DESIGN</b>			
UD1	Planning Statements	Superseded	In line with the Town and Country Planning (Development Management Procedure) (England) Order (Amendment No 3) 2012, Haringey produces a Planning Application Validation Checklist.
UD3	General Principles	DM1, DM2, DM23	Delivering High Quality Design; Accessible and Safe Environments; Environmental Protection
UD7	Waste storage	DM4	Provision and Design of Waste Management Facilities
UD10	Advertisements	DM3	Public Realm, including public art, privately owned spaces, advertisements and telecommunication equipment.
UD11	Telecommunications equipment	DM3	Public Realm, including public art, privately owned spaces, advertisements and telecommunication equipment.
<b>ENVIRONMENT</b>			
ENV5	Works affecting the water course	DM24, DM28	Managing and Reducing Flood Risk; Watercourses and Flood Defences
ENV6	Noise pollution	DM1, DM23	Delivering High Quality Design; Environmental Protection
ENV7	Air, water and light pollution	DM1, DM23, DM27	Delivering High Quality Design; Environmental Protection; Protecting and Improving Groundwater Quality and Quantity
ENV11	Contaminated land	DM23	Environmental Protection
ENV12	Development at or near premises involving use or storage of hazardous substances	DM23	Environmental Protection

UDP Policy	Policy Name	Policy Superseded by Local Plan: DM Policies	Policy Name
<b>HOUSING</b>			
HSG2	Change of use to residential	DM10, DM12, DM38,	Housing Supply; Housing Design and Quality; Employment-led Regeneration
HSG5	Hostel accommodation	DM15	Specialist Housing
HSG6	Houses in Multiple Occupation	DM17	Houses in Multiple Occupation
HSG7	Housing for special needs	DM15	Specialist Housing
SHG11	Restricted Conversion Areas	DM16	Residential Conversions;
<b>EMPLOYMENT</b>			
EMP4	Non employment generating uses	DM38, DM39, DM40	Employment-led Regeneration; Warehouse Living; Loss of Employment Land and Floorspace
EMP5	Promoting employment uses	DM37, DM38, DM40	Maximising the Use of Employment Land and Floorspace; Employment-Led Regeneration; Loss of Employment Land and Floorspace
EMP6	Car repair workshops, garages and car washes	N/A	Deleted and not replaced.
EMP7	Live/work units	DM39	Warehouse Living
<b>TOWN CENTRE</b>			
TCR2	Out of town centre development	DM41	New Town Centre Development
TCR3	Protection of shops in town centres	DM41, DM42, DM45	New Town Centre Development; Primary and Secondary Frontages; Maximising the Use of Town Centre Land and Floorspace
TCR4	Protection of local shops	DM41, DM43, DM44	New Town Centre Development; Local Shopping Centres; Neighbourhood Parades and Other Non-Designated Frontages
TCR5	A3 restaurants and cafes, A4 drinking establishments and A5 hot food takeaways	DM1, DM23, DM41, DM47	Delivering High Quality Design; Environmental Protection; New Town Centre Development; Hot Food Takeaways
<b>MOVEMENT</b>			
M8	Access roads	DM33, DM37	Crossovers and Vehicular Access; Maximising the Use of Employment Land and Floorspace
M9	Car free residential developments	DM32	Parking
M10	Parking for development	DM32	Parking
M12	Minicabs	DM36	Mini Cab offices
<b>OPEN SPACE</b>			
OS3	Significant Local Open Land	DM20	Open Space and Green Grid
OS4	Alexandra Park and Palace	DM9, DM20	Management of the Historic Environment; Open Space and Green Grid
OS5	Development Adjacent to Open Space	DM1, DM2, DM20	Delivering High Quality Design; Accessible and Safe Environments; Open Space and Green Grid
OS8	Heritage Land	DM2, DM9	Accessible and Safe Environments; Management of the Historic Environment
OS17	Tree protection, tree masses and spines	DM1, DM19	Delivering High Quality Design; Nature Conservation
<b>CREATIVE, LEISURE &amp; TOURISM</b>			
CLT3	Social clubs	DM1, DM42, DM49	Delivering High Quality Design; Primary and Secondary Frontages; Managing the Provision and Quality of Community Infrastructure
CLT4	Hotels, boarding houses and guest houses	DM53	Hotels and Visitor Accommodation

UDP Policy	Policy Name	Policy Superseded by Local Plan: DM Policies	Policy Name
<b>CONSERVATION</b>			
CSV4	Alterations and extensions to listed buildings	DM9	Management of the Historic Environment
CSV5	Alterations and extensions in conservation areas	DM9	Management of the Historic Environment
CSV6	Demolition of listed buildings	DM9	Management of the Historic Environment
CSV7	Demolition in conservation areas	DM9	Management of the Historic Environment
CSV8	Archaeology	DM9	Management of the Historic Environment

## Appendix E: Supplementary Planning Document & Guidance Replacement

8.1.4 When adopted, this document will supersede certain supplementary guidance, specifically:-

- SPG1a Design Guidance. This document was adopted in January 2006. It will be superseded by the Design Policies contained in this DPD.
- SPG1b Parking in Front Gardens This document was drafted in 2006 and not adopted. The guidance contained in this document will be replaced by the parking policies contained in the DM DPD, and SPG1b is effectively withdrawn.
- SPG 6a - Shopfronts, Signage & Security This document was drafted in 2006 and not adopted. The guidance contained in this document will be replaced by the design policies contained in the DM DPD, and SPG6a is effectively withdrawn.
- SPG 6b – Advertisements This document was drafted in 2006 and not adopted. The guidance contained in this document will be replaced by the parking policies contained in the DM DPD, and SPG6b is effectively withdrawn.
- SPG 7a - Vehicle and Pedestrian Movement This document was drafted in 2006 and not adopted. The guidance contained in this document will be replaced by the parking policies contained in the DM DPD, and SPG7a is effectively withdrawn.

## Appendix F: Glossary of Terms

- **Accessibility:** Ability of people or goods and services to reach places and facilities.
- **Accessible Development:** A building, facility etc. and its wider environment which can be reached and used, in particular by people with disabilities.
- **Accessible Transport:** Transport services and vehicles designed and operated to be usable by people with disabilities and other transport disadvantaged people, with characteristics possibly including affordable fares, wheelchair user accessibility and easy reach of final destination.
- **Active Frontages:** street frontages where there is an active visual engagement between those in the street and those on the ground floors of buildings. This quality is assisted where the front facade of buildings, including the main entrance, faces and open towards the street. This is not the same as attractive frontages, such as art walls, green walls or display boxes. Active frontages are often taken to mean continuous rows of highly-glazed shop fronts with frequent entries and cafes.
- **Affordable Rent:** Rented housing let by registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is not subject to the national rent regime but is subject to other rent controls that require a rent of no more than 80 per cent of the local market rent.
- **Affordable Housing:** Affordable housing includes social rented and intermediate housing provided to specific eligible households whose needs are not met by the market (See entry for affordable rent, intermediate and social rented for further details).
- **Amenity:** A positive element or elements which contribute to the overall character or an area, for example open land, trees, historic buildings and the inter-relationship between all elements in the environment.
- **Authority Monitoring Report (AMR):** Report published by the Council which provides updates on the preparation of the Council's Local Plan and other planning documents and assesses performance of adopted planning policies.
- **Area Action Plan (AAP):** Development Plan Documents used to provide a planning framework for areas of change (e.g. major regeneration) and areas of conservation.

- **Area of Archaeological Importance:** Areas with known archaeological potential where the Council's archaeology policies will normally be strictly applied.
- **Area for Intensification:** These are areas which have significant potential for increases in residential, employment and other uses through development for regeneration of available sites and exploitation of potential for regeneration, through higher densities and more mixed and intensive use. These areas have good existing or planned public transport.
- **Area of Change:** These are areas with considerable potential for growth, though on a lesser scale than growth areas. These areas are appropriately located to support growth and contain identified sites which are available and suitable for development.
- **Area of Opportunity:** London's principal opportunities for accommodating large scale development to provide substantial numbers of new employment and housing, each typically more than 5,000 jobs and /or 2,500 homes, with a mixed and intensive use of land and assisted by good public transport accessibility.
- **Article 4 Direction:** A power available under the 1995 General Development Order allowing the Council, in certain instances, to restrict permitted development rights.
- **Backland Development:** Development of land-locked sites, such as rear gardens, private open space or old lock up garages, usually within predominately residential areas.
- **Biodiversity:** Biodiversity encompasses the whole variety of life on earth (including on or under water) including all species of plants and animals and the variety of habitats within which they live. It also includes the genetic variation within each species.
- **Biodiversity Action Plan (BAP) – Haringey:** The Biodiversity Action Plan includes policies and actions that will contribute towards conserving, enriching and celebrating the wildlife in Haringey.
- **Blue Ribbon Network:** Policy covering London's waterways, water spaces and land alongside them.
- **Building Research Establishment Assessment Method (BREEAM):** used to assess the environmental performance of new and existing buildings.
- **Brownfield Land:** Previously developed land which is or has been occupied by a permanent structure.
- **Borough Roads:** Roads for which the Borough is the Highway Authority.
- **Building Line:** The line formed by frontages of buildings along a street.
- **Car Club:** Schemes which facilitate vehicle sharing.
- **Central Activity Zone (CAZ):** The CAZ is the area where planning policy recognises the importance of strategic finance, specialist retail, tourist and cultural uses and activities, as well as residential and more local functions.
- **Care in the Community:** This enable people in need of care, whether because of old age, disability, illness or other reasons, to continue to live in their own homes or in homely settings within the community.
- **Census:** A ten-yearly comprehensive nation-wide sample survey of population, housing and socio-economic data. The latest one was conducted in March 2011.
- **Cluster:** Geographical concentration of interconnected companies, specialised supplies, service providers in related industries, and associated institutions (for example universities, standard agencies, and trade associations) in particular firms that compete but also co-operate.
- **Combined Heat and Power (CHP):** The combined production of heat, usually in the form of steam, and power, usually in the form of electricity.
- **Community Facilities:** Community facilities can be defined as including children's play and recreation facilities, services for young people, older people and disabled people, as well as health facilities, facilities for emergency services, including police facilities, education facilities, libraries, community halls, criminal justice facilities meeting rooms, places of worship, public toilets, pubs and post offices.
- **Community Infrastructure Levy (CIL):** A per square metre tariff on new development seeking to raise revenue to fund new infrastructure.
- **Community Transport:** A range of voluntary sector, non profit-making transport services designed to meet the needs of people who do not have access to private transport and for whom public transport is unsuitable.
- **Comparison Goods:** Goods for which the purchase involves comparison by the customer and which while not being purchased frequently must nevertheless be stocked in a wide range of size, colours and fabrics, jewellery, furniture and goods normally sold at specialist shops and general stores.
- **Compulsory Purchase Order (CPO):** An order which enables a statutory authority to purchase an area of land compulsory for an approved project.
- **Conservation Area:** Area designated by the Council under the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 as possessing special architectural or historic interest. The Council will seek to preserve and enhance the character and appearance of these areas.
- **Contaminated Land:** Land which contains potentially harmful substances as a result of human activity or from natural causes may be regarded as contaminated land. Because substances in or on the land may be hazardous and likely to affect its proposed development, a quantitative risk based assessment is required to determine whether the proposed development should proceed and whether some form of remedial action is required.
- **Context:** In urban design terms the character and setting of the immediate local area within which a building or site is situated or to be sited. The context will take into account any local distinctiveness of an area i.e. the particular positive features of a locality that contribute to its special character and sense of place and distinguish one local area from another.

- **Convenience Goods:** Good purchased on a regular basis which meet the day to day needs of local residents. They require minimum effort in selection and buying e.g. food, newspapers and other goods of a standardised type of which there is a wide sale.
- **Conversions:** The sub-division of residential properties into self-contained flats or maisonettes.
- **Core Strategy:** The Core Strategy was the former title of the Strategic Policies Local Plan document.
- **Culture:** A way of life including, but not limited to language, arts and science, thought, spiritual activity, social activity and interaction (the Roshan Cultural Heritage Institute).
- **Cultural Quarter:** Area where a critical mass of cultural activities and related uses are emerging, usually in historic or interesting environment.
- **Decent Homes Standard:** A Government standard for housing which requires both Councils and Registered Social Landlords (RSLs) to bring up their property standards to a defined minimum by 2010.
- **Density:** The number of habitable rooms per hectare.
- **Designated Views:** Views which focus on architecturally and culturally important groups of buildings that can be enjoyed from well managed public spaces
- **Development Management Development Plan Document (DMDPD):** These are the policies which are required to ensure that all development in the Borough meets the spatial vision and objectives set out in the Local Plan.
- **Development Plan Documents (DPD):** Statutory planning documents that form part of the Local Development Framework including the Strategic Policies Local Plan, Development Management Policies and Site Allocations Document.
- **District Centre:** District centres have traditionally provided convenience goods and services for more local communities and accessible by public transport, walking and cycling.
- **Ecological Corridor:** Ecological Corridors are relative areas of green space running through built up areas that allow the movement of plants and animals to other areas and habitats.
- **Emergency Services:** Includes Fire, Police and Ambulance services.
- **Employment Land Review (ELR):** A study providing evidence of the macroeconomic circumstances driving the need for provision of employment land in the Borough.
- **Environmental Assessment:** A method or procedure for predicting the effects on the environment of a proposal, either for an individual project or a higher-level 'strategy' (a policy, plan or programme), with the aim of taking account of these effects in decision-making.
- **Fluvial:** Water in the Thames and other rivers.
- **Form:** The layout (structure and urban grain), density, scale (height and massing), appearance (materials and details) and landscaping of development.
- **Garden Land** – (including back gardens and private residential gardens) is the area within a defined dwelling curtilage used for amenity purposes from which the public is excluded.
- **General Development Order (GDO):** Identifies the certain types of usually minor development for which planning permission is not required and which therefore do not require a planning application to be submitted to the Council.
- **Greater London Authority (GLA):** The GLA is a strategic citywide government for London. It is made up of a directly elected Mayor and a separately elected Assembly.
- **Green Belt:** Green Belt is an area of land which has been given special status to restrict inappropriate development.
- **Green Chain/Link:** Linked green spaces composed of such elements as open land, footpaths, canals and rivers which provide public access, play valuable recreational, conservation, ecological and general amenity role. Green chains can also be Ecological Corridors.
- **Green Industries:** This business sector that produced goods or services, which compared to other more commonly used goods and services, are less harmful to the environment.
- **Green Infrastructure:** A network of connected, high quality, multi-functional open spaces, corridors and the links in between that provide multiple benefits for people and wildlife.
- **Green Roofs:** Planting on roofs to provide climate change, amenity and recreational benefits.
- **Growth Area:** Specific areas for new residential development to accommodate future population growth. In Haringey, there are two including Tottenham Hale, Opportunity Area, and Haringey Heartlands, Area of Intensification.
- **Gyratory:** A road junction at which traffic enters a one-way system around a central island.
- **Health Impact Assessment (HIA):** A process for ensuring that land use and planning decision making at all levels consider the potential impacts of decisions on health and health inequalities. It identifies actions that can enhance positive effects and reduce or eliminate negative effects.
- **Heritage Land:** Heritage Land is open land of strategic importance to London of significance for its landscape, historical and nature conservation interest. The only Heritage land at the present time is Highgate Golf Course which forms part of the wider area of Hampstead Heath.
- **Highway Authority:** An authority responsible for a highway, whether or not maintainable at public expenses.
- **Historic Parks and Gardens:** Parks and gardens containing historic features dating from 1939 or earlier registered by English Heritage. These parks and gardens are graded I, II or II\* in the same way as Listed Buildings. Only Alexandra Park and Finsbury Park are registered in Haringey.



- **Homes and Community Agency (HCA):** HCA is the national housing and regeneration agency for England.
- **House in Multiple Occupation (HMO):** Housing occupied by members of more than one household, such as student accommodation or bedsits.
- **Housing Association:** see Registered Provider.
- **Housing Trajectory:** Graph illustrating the supply of projected completion housing completions up to 2026.
- **Industrial Business Park (IBP):** Strategic industrial locations that are particularly suitable for activities that need better quality surroundings including research and development, light industrial and higher value general industrial, some waste management, utility and transport functions, wholesale markets and some small scale distribution. They can be accommodated next to environmentally sensitive areas.
- **Intermediate Housing:** Housing available at prices and rents above those of social rent but below market prices or rents.
- **Landmarks:** Buildings and structures, other than Strategically Important Landmarks, that are visually or culturally prominent in Designated Views
- **Landscape:** The character and appearance of land, including its shape, form, ecology, natural features, colours and elements and the way these elements combine.
- **Lifetime Home:** Ordinary homes designed to provide accessible and convenient homes for a large segment of the population.
- **Linear View:** A view seen through narrow gaps between buildings or landscaping
- **Listed Building:** Locally listed buildings are those which satisfy one or more of the following criteria: historic interest, architectural interest or environmental significance. Statutory listed buildings are buildings of special architectural or historic interest, they are graded as I, II\* or with grade I being the highest. English Heritage is responsible for designating buildings for statutory listing in England.
- **Local Development Documents (LDD):** The collective term for Development Plan Documents, Supplementary Planning Documents (does not form part of the statutory development plan) and other documents including the Statement of Community Involvement.
- **Local Development Framework (LDF):** The plan for the future development of the local area, drawn up by the local planning authority in consultation with the community. In law this is described as the development plan documents adopted under the Planning and Compulsory Purchase Act 2004. Current Local Plans or other planning policies, which under the regulations would be considered to be development plan documents, form part of the Local Plan.
- **Local Development Scheme (LDS):** The LDS sets out the programme/timetable for preparing the LDD.
- **Local Implementation Plan (LIP):** Statutory transport plans produced by London Boroughs bringing together transport proposals to implement the Mayor's Transport Strategy at the local level.
- **Local Nature Reserve (LNR):** Sites which offer special opportunities for people to see and learn about wildlife in natural surroundings. LNRs are a statutory designation made under the National Parks and Access to the Countryside Act 1949.
- **Strategic Policies Local Plan:** The Strategic Policies Local Plan is a Development Plan Document setting out the vision and key policies for the future development of the Borough up to 2026.
- **Local Shopping Centre:** The level of shopping centre below District Centre level, providing services for local communities.
- **Local Strategic Partnership (LSP):** A partnership of people that bring together organisations from the public, private, community and voluntary sector within a local authority area.
- **London Development Agency (LDA):** Organisation acting on behalf of the Mayor, whose aim is to further the economic development and regeneration of London.
- **London Plan (The Spatial Development Strategy):** The London Plan is the name given to the Mayor's spatial development strategy for London.
- **Main River:** All watercourses shown on the statutory main river maps held by the Environment Agency and the Department of Environment, Food and Rural Affairs (see also Watercourse, Ordinary Watercourse).
- **Market Housing:** Private housing for rent or for sale, where the price is set in the open market.
- **Metropolitan Open Land (MOL):** Strategic open land within the urban area that contributes to the structure of London.
- **Metropolitan Town Centre:** Metropolitan centres serve wide catchments areas and can cover several Boroughs. Typically they contain at least 100,000sq.m of retail floorspace with a significant proportion of high-order comparison goods relative to convenience goods. These centres generally have very good accessibility and significant employment, leisure, service and civic functions.
- **Mixed tenure:** A mix of affordable and market housing.
- **Mixed Use Development:** Provision of a mix of complementary uses, such as residential, community and leisure uses on a site, within the same building or within a particular area.
- **National Planning Policy Framework (NPPF):** Sets out the Government's planning policies for England and how they are expected to be applied. The NPPF replaces 44 planning documents, primarily Planning Policy Statements (PPS) and Planning Policy Guidance (PPGs), which previously formed Government policy towards planning.
- **Neighbourhood and more local centres:** Typically serve a localised catchment often most accessible by walking and cycling. They include local parades and small cluster of shops, mostly for convenience goods and other services.

- **Open Space:** All land in London that is predominately undeveloped other than by buildings or structures that are ancillary to the open space use. The definition covers the broad range of types of open space within London, whether in public or private ownership and whether public access is unrestricted, limited or restricted.
- **Ordinary Watercourse:** All other watercourses which are not shown on the statutory main river maps help by the Environment Agency and the Department of Environment, Food and Rural Affairs. (See also: Watercourse, Main Rivers)
- **Panorama:** A broad prospect seen from an elevated public viewing place
- **Planning Obligations Supplementary Planning Document:** A guidance document offering support in the implementation of planning obligations on planning applications subsequent to the adoption of the Haringey CIL.
- **Primary Care Trust (PCT):** PCTs decide what health services a local community needs, and they are responsible for providing them.
- **Public Realm:** This is the space between and within buildings that is publicly accessible, including streets, squares, forecourts, parks and open spaces.
- **Public Transport Accessibility Level (PTAL):** Public Transport Accessibility Levels are a measure of the extent and ease of access to the public transport network.
- **Quietways:** A network of radial and orbital cycle routes throughout London which overcome barriers to cycling, targeting less confident cyclists who want to use low-traffic routes while also providing for existing cyclists who want to travel at a gentler pace.
- **Regeneration:** The economic, social and environmental renewal and improvement of a rural or urban area.
- **Registered Provider:** non-profit making organisations that provide low-cost housing for people in need of a home.
- **River Prospect:** Short and longer distance visual experiences of a rivers cape (in HGY case Lee, Moselle or New River)
- **Section 106 Agreements (S106)/Planning Obligations:** These agreements confer planning obligations on persons with an interest in land in order to achieve the implementation of relevant planning policies as authorised by Section 106 of the Town and Country Planning Act 1990.
- **Secured by Design:** The planning and design of street layouts, open space, and buildings so as to reduce the likelihood or fear of crime.
- **Self-Build Housing:** As defined in the Community Infrastructure Regulations (Amendment) 2014. A dwelling built by a person (including where built following commission by a person, and occupied by a person as the person's sole or main residence.
- **Site Allocations Development Plan Document:** This will form part of Haringey's LDF and will guide land use and future development in the Borough until 2026.
- **Sites of Importance for Nature Conservation (SINC):** SINC's are areas protected through the planning process having been designated for their high biodiversity value.
- **Site of Specific Scientific Interest (SSSI):** Sites designated by Natural England under the Wildlife and Countryside Act 1981.
- **Small and Medium Enterprises (SMEs):** Small and Medium Enterprises (SMEs) comprise businesses with more than 11 but less than 250 staff.
- **Social Infrastructure:** Facilities and services including health provision, early years provision, schools, colleges and universities, community, cultural, recreation and sports facilities, places of worship, policing and other criminal justice or community safety facilities, children and young people's play and informal recreation facilities. This list is not intended to be exhaustive and other facilities can be included as social infrastructure.
- **Social Rented Housing:** Rented housing owned and managed by local authorities or registered social landlords, or be provide by other bodies under equivalent rental agreements.
- **Spatial Vision:** A statement of long term shared goals for the spatial structure of an area.
- **Statement of Community Involvement (SCI):** The Council's policy for involving the community in the preparation, review and alteration of LDDs and planning applications. It includes who should be involved and the methods to be used.
- **Strategic Environmental Assessment (SEA):** Expression used by the European Union to describe environmental assessment as applied to policies, plans and programmes.
- **Strategic Housing Land Availability Assessment (SHLAA):** An assessment of land availability for housing which informs the London Plan and Borough local development documents, as set out in section 48 of the NPPF
- **Strategic Housing Market Assessment (SHMA):** An assessment of housing need and demand which informs the London Plan and Borough local development documents.
- **Strategic Industrial Location (SIL):** These comprise Preferred Industrial Locations (PILs) and Industrial Business Parks and exist to ensure that London provides sufficient quality sites, in appropriate locations, to meet the needs of industrial and related sectors including logistics, waste management, utilities, wholesale markets and some transport functions.
- **Supplementary Planning Document (SPD):** Provides supplementary information about the policies in DPDs. They do not form part of the development plan and are not subject to independent examination.

- **Supplementary Planning Guidance (SPG):** Additional advice, provided by the Council on particular topic or policy areas and related to and expanding upon statutory policies.
- **Sustainability Appraisal (SA):** This is a systematic and continuous assessment of the social, environmental and economic effects of strategies and policies contained in the DPDs, which complies with the EU Directive for Strategic Environmental Assessment.
- **Sustainable Urban Drainage Systems (SUDS):** An alternative approach from the traditional ways of managing runoff from buildings and hardstanding. They can reduce the total amount, flow and rate of surface water that runs directly to rivers through storm water systems.
- **Tall Buildings:** The Council has adopted the definition of Tall and Large Buildings as those which are substantially taller than their neighbours, have a significant impact on the skyline, are of 10 storeys and over or are otherwise larger than the threshold sizes set for referral to the Mayor of London.
- **Townscape View:** Unfolding close view of built up environment with spaces between and in each case views might or might not contain (but will be more significant if they do):
- **Tree Preservation Order (TPO):** Made under the Town and Country Planning Act 1990 by the local planning authority to protect trees of importance for amenity, landscape and nature conservation.
- **Urban Characterisation Study (UCS):** An appraisal of the character of the Borough in terms of built urban form, topography, conservation and heritage value.
- **Use Classes Order:** The Town and Country Planning (Use Classes) Order 1987, as amended, lists 15 classes of use. A change of use within the same Class does not constitute development and thus does not require planning permission.
- **Unitary Development Plan (UDP):** A UDP is a land use plan that seeks to make the most efficient and effective use of land in the public interest. The LDF will eventually replace Haringey's UDP 2006.
- **View Corridor:** Strategic important views designated in the London Views Management Framework.
- **Warehouse Living:** Purpose built and genuine integrated working and living accommodation specifically targeted at the creative industries sectors.
- **Watercourse:** Term which applied to both main rivers and ordinary watercourses.
- **Windfall Development:** Any residential development that is granted consent on land or buildings not specifically allocated for residential development in Haringey's Local Plan documents.

## Appendix G: Making Representations to the Plan

### Introduction

The Development Management Policies development plan document (DPD), the 'Plan', is published in order for representations to be made prior to submission. The representations will be considered alongside the published Plan when submitted to the Secretary of State for examination by an independent Planning Inspector. The Planning and Compulsory Purchase Act 2004 (as amended) (the 2004 Act) states that the purpose of the examination is to consider whether the Plan complies with the legal requirements and is 'sound'.

### Legal Compliance

The Inspector will first check that the Plan meets the legal requirements under s20(5)(a) of the 2004 Act before moving on to test for soundness.

Before making a representation please consider the following:

- The Plan in question should be within the current Local Development Scheme (LDS) and the key stages should have been followed. The LDS is effectively a programme of work prepared by the Local Planning Authority (LPA), setting out the Local Development Documents it proposes to produce over a three year period. It will set out the key stages in the production of any DPDs which the LPA propose to bring forward for independent examination. If this DPD is not in the current LDS it should not have been published for representations. The LDS should be on the LPA's website and available at their main offices.
- The process of community involvement for the Plan in question should be in general accordance with the LPA's Statement of Community Involvement (where one exists). The Statement of Community Involvement (SCI) is a document which sets out a LPA's strategy for involving the community in the preparation and revision of Local Development Documents (including DPDs) and the consideration of planning applications.
- The Plan should comply with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- On publication, the LPA must publish the documents prescribed in the regulations, and make them available at their principal offices and their website. The LPA must also place local advertisements and notify statutory bodies (as set out in the regulations) and any persons who have requested to be notified.
- The LPA is required to provide a Sustainability Appraisal Report when they publish a DPD. This should identify the process by which the Sustainability Appraisal has been carried out, and the baseline information used to inform the process and the outcomes of that process. Sustainability Appraisal is a tool for appraising policies to ensure they reflect social, environmental, and economic factors.
- The Plan should have regard to national policy and conform generally to the London Spatial Development Strategy, i.e. the London Plan. This sets out policies for the Greater London region in relation to development and use of land, and forms part of the development plan for LPAs.

- The Plan must have regard to any Sustainable Community Strategy (SCS) for its area. The SCS is usually prepared by the Local Strategic Partnership which is representative of a range of interests in the LPA's area.

## Soundness

Soundness is explained fully in the National Planning Policy Framework in paragraph 182.

The Inspector must be satisfied that the Plan has been positively prepared and is justified, effective and consistent with national policy. To be sound the Plan should be:

### Positively Prepared

The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

### Justified

This means that the Plan should be founded on a robust and credible evidence base involving:

- Evidence of participation of the local community and others having a stake in the area.
- Research/fact finding: the choices made in the plan are backed up by facts

The Plan should also provide the most appropriate strategy when considered against reasonable alternatives. These alternatives should be realistic and subject to sustainability appraisal. The Plan should show how the policies and proposals help to ensure that the social, environmental, economic and resource use objectives of sustainability will be achieved.

### Effective

This means the Plan should be deliverable, embracing:

- Sound infrastructure delivery planning;
- Having no regulatory or national planning barriers to delivery;
- Delivery partners who are signed up to it; and
- Coherence with the strategies of neighbouring authorities.

The Plan should also be flexible and able to be monitored.

The Plan should indicate who is to be responsible for making sure that the policies and proposals happen and when they will happen. The Plan should be flexible to deal with changing circumstances, which may involve minor changes to respond to the outcome of the monitoring process or more significant changes to respond to problems such as lack of funding for major infrastructure proposals. Although it is important that policies are flexible, the Plan should make clear that major changes may require a formal review including public consultation.

Any measures which the LPA has included to make sure that targets are met should be clearly linked to an Authority Monitoring Report.

## Consistent with national policy

The Plan should be consistent with national policy. Where there is a departure, LPAs must provide clear and convincing reasoning to justify their approach.

Conversely, respondents may feel the LPA should include a policy or policies which would depart from national or regional policy to some degree in order to meet a clearly identified and fully justified local need, but they have not done so. In this instance it will be important for you to say in your representations what the local circumstances are which justify a different policy approach to that in national or regional policy and support your assertion with evidence.

If you think the content of the Plan is not sound because it does not include a policy where it should, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by any national planning policy or in the London Plan (2015)? If so it does not need to be included.
- Is what you are concerned with covered by any other policies in the Plan on which you are seeking to make representations or in any other DPD in the Local Plan. There is no need for repetition between documents in the Local Plan.
- If the policy is not covered elsewhere, in what way is the Plan unsound without the policy?
- If the Plan is unsound without the policy, what should the policy say?

## General advice

If you wish to make a representation seeking a change to the Plan or part of the Plan you should make clear in what way the Plan or part of the Plan is not sound having regard to the legal compliance check and three tests set out above. You should try to support your representation by evidence showing why the Plan should be changed. It will be helpful if you also say precisely how you think the Plan should be changed. Representations should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further submissions based on the original representation made at publication. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

Where there are groups who share a common view on how they wish to see the Plan changed, it would be helpful for that group to send a single representation which represents the view, rather than for a large number of individuals to submit separate representations which repeat the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

# Haringey

LONDON

London Borough of Haringey  
River Park House  
225 High Road  
Wood Green  
N22 8HQ

[www.haringey.gov.uk](http://www.haringey.gov.uk)

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[www.urban-graphics.co.uk](http://www.urban-graphics.co.uk)



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River Park House  
225 High Road  
Wood Green  
N22 8HQ

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