

Draft London Plan (2017) – Table of Representations: London Borough of Haringey

Introduction

Haringey welcomes the Mayor's draft London Plan, and broadly supports the majority of the provisions within it. The Council particularly supports the draft Plan's ambition to address key issues within the City, including housing affordability. The Council has a number of concerns however about whether the draft London Plan strikes an appropriate balance between various aspects and objectives relating to development and growth. We also have a number of concerns about the deliverability of several aspects of the Plan and the potential negative impacts of some of the policies. In some cases the Plan appears to stray into matters that are not of a strategic scale and reduces the scope for boroughs' Local Plans to provide a local response to these. The recognition that significant investment is required to deliver the plan is noted and the Council supports the Mayor's desire to secure more funding and investment powers from Government but this clearly remains a risk to the delivery of the Plan's objectives.

Haringey Council's detailed comments to the various policies are set out in the table below.

Please do not hesitate to contact me should any of the matters raised require further clarification.

Yours sincerely

Emma Williamson
Assistant Director of Planning.

Chapter 1	Planning London's Future (Good Growth Policies)
London Plan Policy:	Comments
GG1: Building strong and inclusive communities	This policy does address housing and thus the priority of the Plan - to address housing / affordability - which should be referenced in this policy.

Chapter 1	Planning London's Future (Good Growth Policies)
London Plan Policy:	Comments
GG2: Making the best use of land	There are potentially other development or neighbourhood typologies other than high density that represent the best use of land having regard to the local context and character. Reference to 'high density' in the introductory paragraph should be deleted.
GG2 (A)	The focus of development on areas that are well-connected by public transport, walking and cycling is supported. However, orbital public transport connectivity (particularly in outer London) is poor, meaning connectivity to local services can be inadequate and the current radial public transport network emphasises the primacy of central London at the expense of creating balanced communities in outer London. The draft Plan and list of infrastructure projects fail to ensure that outer London has the infrastructure required to support the significant level of growth envisaged.
GG3: Creating a healthy city	The principles of this policy are strongly supported.
GG4 (A)	The Council agrees that a step change is required to increase housing delivery. Councils across London have played their part in granting permissions for thousands of new homes but the rate of delivery remains low. This policy needs to be more robust in its aspiration to address this particular key barrier to raising completion rates to meet need.
GG4(B): Delivering the homes Londoners need	Haringey supports the principle of housing being genuinely affordable. It notes that Government approaches to affordable housing (e.g. "Affordable Rent" and intermediate rent products at up to 80% discounted market rent) do not result in housing that Haringey residents on average incomes within the borough can actually afford. In light of the public distrust of "affordable" housing that these products have engendered, and the likelihood that "genuinely affordable housing" will become an equally mistrusted phrase if it is not seen as genuinely affordable housing, Haringey would argue for a commitment in the Plan to social rented housing, rather than "London Affordable Rent".
GG4 (E)	Haringey supports the desire to seek faster build out rates for developments granted however. It is doubtful that Councils through the planning process will be able to address the issue and entrenched practice of land value capture through the selling of land with planning permission. It would be appropriate for the London Plan to specifically seek to address this strategic planning issue more fully, given that it is one of the more significant barriers to the delivery of housing and housing affordability.

Chapter 1	Planning London's Future (Good Growth Policies)
London Plan Policy:	Comments
GG5: Growing a good economy	Haringey supports this policy.
GG6: Increasing efficiency and resilience	Haringey supports this policy.

Chapter 2	Spatial Development Patterns
London Plan Policy:	Comments
Figure 2.1	In respect of Opportunity Area 14, this should be referred to as 'Wood Green'. Please delete reference to Haringey Heartlands to avoid confusion with the Council's new policy framework for this area.
SD1: Opportunity Areas	Haringey welcomes the Mayor's intention to support and assist growth in Opportunity Areas, and strongly supports Wood Green being identified as an Opportunity Area. However, the Council considers that the delivery of Opportunity Areas should be prioritised in terms of both housing distribution and in policy objectives. In respect of the latter, greater flexibility needs to be introduced to overcome policy constraints inherent in other parts of the Plan such as MOL and biodiversity & heritage conservation, recognising that, where compromise is justified, it results in more sustainable outcomes both within and without of the Opportunity Area.
Paragraph 2.1.1	Paragraph 2.1.1 indicates that Opportunity Areas are the capital's most significant locations with development capacity. In London boroughs such as Haringey, with the Mayor's proposed approach to suburban intensification, this is not the case as about one third of Haringey' housing target is anticipated to come from small sites outside the Opportunity Areas and not necessarily in areas as accessible to town centres and public transport nodes. This is similar to the ratio proposed in Table 4.2 for the city as a whole.

Chapter 2	Spatial Development Patterns
London Plan Policy:	Comments
	It is therefore apparent that ‘small sites’ and suburban locations are intended to make relatively the same strategic contribution as Opportunity Areas to providing the capacity to meet London’s housing needs.
Supporting London’s Growth	With respect to the housing and employment figures stated for each of the OAs, the Plan should clarify 1) the amount already delivered – noting that many of these areas and their capacities have been carried forward through a number of earlier iterations of the London Plan and; 2) the amount to be delivered within the current London Plan period. In not providing this detail, the Council considers that this runs the risk of giving a false impression of the actual capacity and contribution OA’s are to make to London’s growth needs.
Figure 2.6	The Council has been progressing a Wood Green Area Action plan to provide the positive policy framework required for the rejuvenation of the town centre and regeneration of the area west of the High Street. The AAP establishes a new housing target of 6,400 new homes and 4,000 jobs. These targets should be reflected in the Figure 2.6
Wood Green/Haringey Heartlands OA	The Council would request that Paragraph 2.1.33 be amended to read: The Planning Framework should promote the opportunity to build on the area’s industrial heritage through new and refurbished workspace in the west of the area, and expand retail provision to reduce dependence on the High Road. It should also set out how site assembly and provision of better links between the town centre, and surrounding areas including Alexandra Palace Park hold the key to comprehensive development.
SD2: Collaboration in the Wider South East	The Council welcomes the recognition in the Plan of this wider collaboration which is currently missing from the Mayor’s draft Housing Strategy. It is understood that the Mayor wants London to meet its own housing needs, but this does not take into account how the wider South East has historically supported London’s growth. The targets set for individual boroughs, particularly those in outer London are likely to be unachievable for a variety of reasons, including unrealistic small sites capacity, lack of affordable housing funding, and lack of funding for associated infrastructure. In addition the draft London Plan places additional constraints where they are not needed and where local areas should have more discretion taking account of local evidence base work and national policies. These will further limit potential which might otherwise have existed, e.g. review of green belt boundaries.

Chapter 2	Spatial Development Patterns
London Plan Policy:	Comments
	As such the Mayor should consider London's housing needs being addressed in the wider South East. Currently the Mayor's commitment is weak in terms of providing clarity on how needs will be met. Greater emphasis should also be placed on ensuring edge of London councils are explicitly considered as part of London's housing market for the purposes of Housing Market Area assessments to identify local housing targets and actively take account of meeting the needs generated within this area as a requirement of the duty to co-operate.
SD4: The Central Activities Zone (CAZ)	No Comment
SD5: Offices, other strategic functions and residential development in the CAZ	No Comment
SD6 (A) Town Centres	The Council supports the enhancement of the vitality and viability of town centres. The Policy should be strengthened further by ensuring the Mayor uses his planning powers to direct strategic retail development proposals to locate in the existing higher order centres. In the past we have seen new metropolitan centres emerge from district centres, to the detriment of existing metropolitan centres that are struggling to maintain their strategic role and function, and require such investment to rejuvenate and thrive.
SD6 (B)	Guidance on how this should be achieved at a London wide level should be detailed by the Mayor, to ensure a comprehensive approach in ensuring town centres do not decline.
SD6 (C)	The Council supports the principle of housing in town centres and has local policies to support this. Residential only schemes within the town centre are of concern however given Local Evidence and Plans to encourage mixed use developments to re-vitalise the Borough's centres.

Chapter 2	Spatial Development Patterns
London Plan Policy:	Comments
SD6 (E)	The Council supports the increase in housing and the managed re-development of existing office space. However, this should not be at the risk to the viability and vitality of the Town Centre. In order for LPA's to make a planning decision on the cumulative impact of Prior Approval, a threshold or guidance should be provided by the Mayor to justify planning decisions i.e. at what point (% losses, vacancy rates etc) would the impact of prior approval tip the balance towards retaining office space?
SD6 (J)	Ground floor residential is a sign that a parade or centre is in decline, and cannot support retail / employment floorspace. Residential use in these locations would not be reversible and would result in inactive frontages, the loss of vibrancy and vitality within centres and poor quality residential. Policy should allow for developments to be considered more in line with local evidence.
SD7: Town centre network (B)	The retention of Wood Green as a metropolitan centre is welcomed.
SD8: Town centres: development principles and Development Plan Documents	The Council supports this policy.
SD9: Two centres: Local partnerships and implementation	Haringey welcomes the encouraging policy to implement Article 4 directives to assist in the loss of office space within town centres.

Chapter 3	Design
London Plan Policy:	Comments
D1: London's form and characteristics	This policy is generally supported.

Chapter 3	Design
London Plan Policy:	Comments
D1(B)	The Council supports this policy. However, there is concern that this policy requires development to respond to the surrounding context, yet Policy H2 Small Sites is encouraging developments that may be substantially out of character with the existing area. This would be especially evident in outer London boroughs.
D2: Delivering good design	Whilst this policy is supported in principle as a means to identifying an areas capacity for growth, this level of assessment will be challenging in the context of resourcing and capacity constraints within Local Planning Authorities. Apart from conservation areas, many local authorities will not have detailed assessments of their areas.
D2: (E-G)	The use of Design Review Panels is supported by the Council and Haringey has established such a panel.
D3: Inclusive design	The Council supports this policy.
D4: Housing quality and standards	The Council supports the Housing Quality and Standards Policy. Greater clarity should be provided with regard to one bedroom, one person flats (not being set out as a studio) and greater detail on large-scale HMO/ 'Collective Living' arrangements - whilst these may assist in providing housing choice, they do not always provide a high quality standard of living.
D5: Accessible housing	This policy is supported. The supporting text could provide greater clarity on the extent to which it applies to new dwellings (i.e. new build and / or change of use / conversions).
D6: Optimising housing density	The Council supports the policy to ensure development make the most efficient use of available sites.
D7: Public realm	The policy is supported. There does however need to be recognition of the pressures on public finances to maintain the quality of spaces in the longer term, which is sometimes harder to achieve than the initial cost of installation.
D8: Tall buildings	The principle of the policy is supported.

Chapter 3	Design
London Plan Policy:	Comments
D9: Basement development	The Council support this policy.
D10: Safety, security and resilience to emergency	This policy is supported.
D11: Fire Safety	The Council supports this policy.
D12: Agent of Change	<p>The Council strongly supports the inclusion of the Agent of Change policy.</p> <p>The Council is however concerned about the ability for developments to satisfactorily mitigate noise in relation to policy E7 which seeks to intensify existing industrial estates/mixed uses etc. Even in the event that the proposed new development (being a sensitive receiving environment) may have measures in place, there is concern that this maybe insufficient to provide future users of an industrial park/site confidence to take up a lease/purchase the property. It is considered that agent of change should assume worst case scenario / impact i.e. B2 rather than for example, current B8.</p> <p>Whilst many buildings are able to incorporate further materials into the built fabric, this can end up having an impact on viability, which leads to potentially fewer contributions such as affordable housing.</p>
D13: Noise	The Council supports this policy.

Chapter 4	Housing
London Plan Policy:	Comments
H1: Increasing Housing Supply	The Council supports the intent of this policy, recognising the need to facilitate a substantial increase in housing delivery to address housing affordability within London.

Chapter 4	Housing
London Plan Policy:	Comments
	<p>The draft Plan proposes a significantly different approach to housing, with a much stronger reliance on windfall / small sites, particularly in Outer London; such a reliance on uncertain, unidentified windfall / small sites is considered contrary to the National Planning Policy Framework as the evidence that these sites will come forward is not compelling. The proposed housing target for Haringey is 19,580 homes (1,958 homes per annum), which is a significant increase over our current target of 1,502 homes per year. The Council is concerned about the scale and deliverability of this increase especially in relation to anticipated delivery on small sites and the current delivery of completions as opposed to consents.</p> <p>The Council notes that this is the largest single increase in the housing target in any iteration of the London Plan. But also that, while housing delivery overall has increased since the first London Plan, no previous increase in the target has resulted in a concomitant increase in housing delivery, As such, given that this is likely to result in the biggest gap yet between target and delivery, it is important that the Plan, and related documents such as the Housing Strategy, are much clearer on what can be done to improve the housing experience of Londoners until delivery rises to meet that target.</p> <p>Given the likelihood of an increasing gap between target and delivery, it is crucial that the London Plan address a London-wide approach to the Government’s housing test and Five Year Housing Land Supply. At the moment, borough’s such as Haringey have a significantly lower objectively assessed housing need applying the Government’s new standard method (1,148 dwellings per annum vs current strategic requirement of 1,502 and proposed draft strategic requirement of 1,958), and should therefore not be penalised if delivery falls short of the target, especially in the first years of the uplifted strategic target. This will certainly give rise to further local opposition to growth if unplanned development is imposed by way of grant on the grounds of not being able to demonstrate a 5YHLS.</p>
H2: Small Sites	<p>The Council acknowledges that small sites can potentially make a contribution to housing stock within the Borough. However, the significant increase in Haringey’s overall housing target is essentially attributed to the small sites target for the borough in the draft Plan. The Council has significant concerns about the small sites target for the borough. Our concerns are three-fold and relate to the proposed reliance on windfall / small sites, which the draft Plan indicates will contribute 626 dwellings per year out of the overall target for</p>

Chapter 4	Housing
London Plan Policy:	Comments
	<p>the borough of 1,958 homes per year (i.e. 32% of our overall target).</p> <p>Firstly, the Council has significant concerns about the methodology used to identify the housing capacity of small sites, noting that this methodology and approach to small sites were not discussed with boroughs prior to the draft targets being set. The Council considers the methodology is not robust, in that it uses a 'proxy' for potential housing yield from small sites rather than a detailed assessment of the potential capacity from the three potential types of small sites capacity identified in Policy H2 Small Sites of the draft Plan. The small sites targets set in the draft Plan are therefore not considered to be based on robust evidence and are most likely to be an overestimation of capacity. Such a reliance on uncertain, unidentified windfall / small sites is itself is considered contrary to the National Planning Policy Framework, which requires (paragraph 48) that there must be 'compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment, historic windfall delivery rates and expected future trends, and should not include residential gardens where Borough's have a presumption against development on these.</p> <p>Secondly, the Council considers the small sites targets are undeliverable (although noted they are indicative, the table puts a presumption on Boroughs that developers will assume is an actual target). Haringey currently averages around 175 dwellings per year from small sites in a relatively supportive policy environment. The proposed small sites target of 626 homes per year therefore represents a significant increase from such sites. The proposed small sites policy and its presumption in favour of housing development on sites are unlikely to achieve such a significant increase in delivery of housing on small sites. The proposed Policy presumption in favour of small sites is un-tested and therefore not a reliable basis for setting targets. There is no evidence that the small to medium house builder market within London can grow to sufficiently to meet this target. Such small sites are often not implemented for some time following grant of planning permission, if at all. Further, it would seem to encourage speculation, to maximise land value uplift, where currently this is suppressed as a result of the uncertainty of windfall sites. There is no evidence that this will result in the additional numbers of housing from small sites being delivered above that already being achieved, and will not result in a new industry of selling small sites with permission at well above current market value.</p>

Chapter 4	Housing
London Plan Policy:	Comments
	<p>The Viability Assessment that forms part of the evidence base for the draft Plan arguably does not properly consider the types of developments that are envisaged by the small sites policy and the SHLAA methodology i.e. are these sites genuinely viable.</p> <p>As small sites generally deliver fewer affordable housing units, Haringey would argue for stronger affordable housing policies related to small sites to ensure they benefit the local community. This policy should require that contributions should usually be on-site, rather than off-site contributions. It should also be recognised that getting affordable housing on any small sites will require higher grant levels, as these sites are generally more expensive to deliver in our experience, mainly because there are no economies of scale and the abnormals (which can be proportionately higher) are spread over fewer units.</p> <p>Additionally, Haringey has concerns about the usefulness of the design codes the draft Plan requires boroughs to prepare, given that there will be a wide variety of small sites and each one will have its own constraints and context; the codes are unlikely to give developers the certainty they seek in order to bring the small sites forward any more than the current local policy context.</p> <p>Thirdly, the Council has concerns about the ad-hoc and dispersed nature of sites coming forward through the small sites policy and the implications of this for infrastructure planning (for example, see transport below) and the Mayor's desire for 'good growth'. Such sites are also constrained with respect to how they can deal with other policy requirements such as flood risk / urban greening and Local Polices to protect the supply of family homes.</p> <p>Haringey also believes that the policy understates the infrastructure challenge. That is, it states that minor developments will only have incremental impacts on local infrastructure, that these impacts should be addressed by borough infrastructure delivery plans and that boroughs should not normally refuse permission for smaller development 'on the grounds of infrastructure capacity'. While this may have been defensible when small sites targets were smaller, the cumulative impact of a great many more small developments will produce a substantial need for more infrastructure.</p>

Chapter 4	Housing
London Plan Policy:	Comments
	<p>A further concern is that the NPPF (para 48 and 53) seeks to resist inappropriate development of residential garden land, where it would be harmful to the surrounding area. This national planning policy requirement has filtered through to the Haringey Local Plan where new development is directed towards town centres and key brownfield sites in the Opportunity Area. The Small Site Policy may result in the opening up of residential gardens. The Council query the soundness of this policy in relation to the NPPF. In addition much of Haringey is a Conservation Area and the development of garden land in these areas would have a detrimental impact on these conservation areas.</p> <p>Additionally, the removal of these (often) green spaces, would conflict with the Mayors strategy for London to be 50% green by 2041. Smaller schemes having to achieve a 'pass' in terms of table 8.2 (Urban Greening Factors), may be unreasonably burdened on providing greenspace etc above the 'net' loss of the existing space.</p> <p>Given this, and the relatively permissive policies that Haringey has in relation to encouraging housing schemes, it is unlikely that the unrealistic targets would be able to be achieved.</p> <p>Based on the above, the Council does not feel that it is in a position to offer a re-wording of the proposed policy, as the fundamentals of it (i.e. methodology, evidence base and deliverability) appear to be flawed.</p>
H3: Monitoring Housing Targets	The policy is supported, subject to reconsideration of the small sites target.
H4: Meanwhile Use	The Council supports the principle of this policy.
H5: Delivering Affordable Housing	The Council supports the underlying principle of this policy. Haringey is committed to the delivery of affordable housing as the first priority in residential led schemes. But some variation around this general principle should be able to be applied, where appropriate, to ensure that Councils can make the most appropriate use of their land having regard to a range of other planning objectives such as cross-funding the

Chapter 4	Housing
London Plan Policy:	Comments
	provision of new / improved infrastructure or as a catalyst for town centre renewal or employment-led regeneration.
H6: Threshold approach to applications	<p>The Council supports the threshold approach policy.</p> <p>However, the Council believes that introducing the higher Affordable Housing threshold just for public land should explicitly be identified as a transition phase to adopting this higher threshold on all land, as soon as it is demonstrated it is deliverable. But as noted in policy H5, it also needs to be recognised that Councils need to make the most appropriate use of their land having regard to a range of other planning objectives such as cross-funding the provision of new / improved infrastructure and this policy should not preclude such considerations.</p> <p>The Council also supports the use of review mechanisms where this assists in maximising affordable housing, especially in areas with rising residential values.</p>
H7: Affordable Housing Tenure	The Council supports this policy
H8: Monitoring of Affordable Housing	The Council supports this policy
H9: Vacant Building Credit	<p>The Council supports this policy but considers that an additional criteria should be added to Part B:</p> <p>The building has not been demolished prior to the grant of planning permission.</p> <p>The Council considers the above addition will prevent applicant seeking to circumvent Part C through demolition.</p>

Chapter 4	Housing
London Plan Policy:	Comments
H10: Redevelopment of existing housing and estate regeneration	<p>The Council supports the overall intent of this policy.</p> <p>The Council supports the need to protect existing tenants' ability to remain on site in relation to their affordable housing needs and to ensure that affordable housing should be replaced on an equivalent basis..</p>
H11: Ensuring the best use of stock	The Council supports this policy
H12: Housing size mix	The Council supports the overall intent of this policy.
H13: Build to Rent	The Council supports this policy
H14: Supported and specialised accommodation	The Council supports this policy
H15: Specialist older person housing	The general intent of this policy is supported although it should be strengthened with more definitive wording as to the applicable Use Class (e.g. Part C amend to read 'is considered as being in Use Class C3' and para 4,15.3 '...accommodation should be considered as is C3 housing:'). This removes any ambiguity.
H16: 16 Gypsy and Traveller accommodation	The Council is concerned that the draft Plan's definition of Gypsies and Travellers goes beyond Government policy and the reasons for doing so (paragraph 4.16.2) do not appear to be supported or justified by evidence. The onus is on the Mayor to demonstrate why the definition should depart from that of Government policy.
H17: Purpose-built student accommodation	The Council supports this policy and its emphasis on ensuring mixed and inclusive neighbourhoods.

Chapter 4	Housing
London Plan Policy:	Comments
H18: Large-scale purpose-built shared living	<p>The Council supports this policy although considers the Policy should include locational criteria setting out where such development would be more appropriate. It should also seek to avoid clusters of this particular typology dominating the provision of new housing within an area. Lastly, it should also expressly set out that such development should be car-free. The above will assist in avoiding proposals coming forward in quiet residential suburban streets resulting in unacceptable impacts on the existing residential amenity.</p> <p>The Council would encourage the Mayor to produce guidance for this form of residential accommodation. This should provide guidance on minimum standards, a ratio to determine a satisfactory level of communal space, and design.</p>

Chapter 5	Social Infrastructure
London Plan Policy:	Comments
S1: Developing London's social infrastructure	The Policy is supported
S2: Health and social care facilities	The Policy is supported
S3: Education and childcare facilities	The Policy is supported.
S4: Play and informal recreation	The Policy is supported
S5: Sports and recreation facilities	The Policy is supported.

Chapter 5	Social Infrastructure
London Plan Policy:	Comments
S6: Public toilets	The Policy is supported
S7: Burial space	The Policy is supported

Chapter 6	Economy
London Plan Policy:	Comments
E1: Offices	Haringey supports the overall proposed policies for Offices.
E1 (E)	Support for boroughs making Article 4 Directions to protect existing offices is welcomed.
E1 (G)	Support for lower cost and affordable workspace is welcomed in principle but this will need to be balanced with the impact of this on overall scheme viability, particularly in Outer London where new office space is likely to be part of mixed use development that is predominately residential (with associated affordable housing requirements).
E2: Low-cost business space	Haringey welcomes the principle of supporting the retention and provision of low-cost B1 business space but consider that further information is required with respect to what constitutes low-cost space (beyond that indicated in paragraph 6.2.2). Some space in Haringey is low cost due to it being poor quality, unsuitable size / configuration or offered on a short-tenure basis. Low-cost space that would support SME or start-up businesses needs to be low cost relative to the quality of space offered. The policy should give particular consideration to the provision of low cost workspace near to local and district centres. This will contribute to a mixed economy and support the day time economy.
E2 (B)	This policy should be expanded upon to reflect the considerations outlined in paragraph 6.2.4 as it currently makes no reference to 'viable existing business uses on site'.

Chapter 6	Economy
London Plan Policy:	Comments
E3: Affordable workplace	Haringey welcomes the support for affordable work space, the criteria outlined in Policy E3 and the recognition that boroughs may wish to include more locally specific policies in their Local Plan. As noted previously, the impact of affordable work space provision on broader scheme viability and the provision of affordable housing should be recognised in the policy. It is recognised that in some instances however that affordable work space will be required (and therefore prioritised) in order to make the scheme acceptable in planning terms (i.e. to offset the loss of existing space / businesses).
E4: Land for industry, logistics and services to support London's economic function	Haringey welcomes Policy E4's requirement of no net loss of industrial floorspace capacity (and operational yard capacity) as the Council's own evidence base supports the need to retain key floorspace within the borough.
E4(G)	Haringey supports the Mayor's view that Article 4 Directions should be used to assist in the retention of industrial floorspace; this is supported by the Council's own Article 4 Direction evidence for Warehouse to residential.
E6: Locally Significant Industrial Sites	The Council supports the principle of this policy.
E7: Intensification, co-location and substitution of land for industrial, logistics and services to support London's economic function	The Council supports the draft Plan proposals to retain industrial floor space within London / Haringey; this is supported by the Council's own evidence. Concern is expressed however about the ability for developments to satisfactorily mitigate noise – see response to Agent of Change D12.

Chapter 6	Economy
London Plan Policy:	Comments
E8: Sector growth opportunities and clusters	Haringey supports this policy and notes the recognition of the need to promote economic development clusters in Outer London. The Council support the need for incubation and accelerator space.
E9: Retail, markets and hot food takeaways	Retail and hospitality benefit from services that increase footfall. Other services that should be encouraged would be libraries, health centres, recreation, and arts activities. Haringey recognises the concern regarding A5 hot food takeaway uses and obesity. The Council supports this Policy approach and has local evidence to justify it.
E10: Visitor infrastructure	The Council supports this policy. The bulk of the visitor economy will centre on the CAZ, however it will also at points overlap with the Outer London boroughs, particularly where those boroughs host specialist or niche assets. The London Plan should ensure Outer London Boroughs also benefit from “A sufficient supply of serviced accommodation for business visitors should be maintained”.
E11: Skills and opportunities for all	Haringey fully supports the Skills and Opportunities for All policy.

Chapter 7	Heritage and Culture
London Plan Policy:	Comments
HC1: Heritage Conservation & Growth	Haringey supports this policy, recognising that there needs to be a balance between providing growth within the Borough, whilst preserving and enhancing heritage assets within the Borough.
HC3: Strategic & Local Views	Haringey agrees that important local views require protection, and development within them must be dealt with sensitively (as outlined in Policy HC4 London View Management Framework).

Chapter 7	Heritage and Culture
London Plan Policy:	Comments
HC4: London View Management Framework	The Policy is supported.
HC5: Supporting London's culture and creative industries	The Policy is supported.
HC6: Supporting the night time economy	The Policy is supported.
HC7: Protecting public houses	The Policy is supported and provides further weight to existing local policy.

Chapter 8	Green Infrastructure and Natural Environment
London Plan Policy:	Comments
G1: Green infrastructure (B)	The Council supports this policy, however the Mayor should assist with identifying what and where green infrastructures strategies should be undertaken. G1(B) needs to be strengthened to specify that the strategies should be reflected in local policy and decision making on planning applications / biodiversity offsetting measures.
G2: London's Green Belt	The Council supports the protection of Green Belt Land where robust, up-to-date Green Belt studies identify land as continuing to serve Green Belt purposes (consistent with the NPPF). Policy G2(B) is however considered to be inconsistent with the NPPF, as the statement that 'de-designation of Green Belt is not supported' makes no reference to the NPPF requirement that Local Plans need to be justified by evidence and Green Belt boundaries should be capable of enduring beyond the plan period.
G3: Metropolitan Open Land	The policy is supported

Chapter 8	Green Infrastructure and Natural Environment
London Plan Policy:	Comments
G4: Local green and open space	The policy is supported. Types of Green Spaces should be identified, to increase the ability of providing an increase in biodiversity.
G5: Urban Greening	The Council generally supports this policy, and encourages the Greening of London, in an attempt to achieve the Mayors target of 50% green cover across the City.
G7: Trees and woodlands	The Council supports the retention of trees and woodlands.
G8: Food growing	The Council supports the policy to provide Food Growing within developments. However, the success of these is reliant on the future occupiers of the development. As such, any proposal for this, whilst supported, must be supported with a Management and Maintenance Plan to ensure its on-going success.

Chapter 9	Sustainable Infrastructure
London Plan Policy:	Comments
SI1: Improving air quality	The Council supports this policy. Further guidance is required with respect to what constitutes Air Quality Neutral and Air Quality Positive.
SI2: Minimising greenhouse gas emissions	The Council supports this policy and welcomes the energy efficiency targets within the policy.
9.2.1	It is unclear how Policy SI2 will apply to refurbishments in practice, as it is unclear what constitutes 'major refurbishment'

Chapter 9	Sustainable Infrastructure
London Plan Policy:	Comments
SI3: Energy infrastructure	The Council supports this policy.
SI4: Managing heat risk	The Council supports this policy.
SI5: Water infrastructure	The Council supports this policy.
SI6: Digital connectively infrastructure	The Council supports this policy.
SI7: Reducing waste and supporting the circular economy	The Council supports this policy.
SI8: Waste capacity and net waste self-efficiency	The Council supports this policy.
SI9: Safeguarded waste sites	The Council supports this policy.
SI10: Aggregates	The Council supports this policy.
SI1: Hydraulic fracturing (Fracking)	The Council supports this policy.
SI12: Flood risk management	The Council supports this policy.
SI13: Sustainable drainage	The Council supports this policy.

Chapter 9	Sustainable Infrastructure
London Plan Policy:	Comments
SI14: Waterways – strategic role	The Council supports this policy.
SI15: Water transport	The Council supports this policy.
SI16: Waterways – use and enjoyment	The Council supports this policy.
SI17: Protecting London’s waterways	The Council supports this policy.

Chapter 10	Transport
London Plan Policy	Comments
T1: Strategic approach to transport	<p>The Council agrees with a modal shift to more sustainable transport modes. Improvements however are needed to orbital public transport within outer London.</p> <p>The approach to small sites will focus a significant proportion of new housing within Outer London into areas with poor access to sustainable transport nodes and for which the Mayor has few identified and deliverable/funded infrastructure projects to address these.</p>
T2: Healthy Streets	The Council agrees with the Ten Healthy Streets Indicators/Principles.
T3: Transport capacity, connectivity and safeguarding	The Council supports the policy.

Chapter 10	Transport
London Plan Policy	Comments
	Amend paragraph 10.3.2 to mention the need to provide better orbital routes that would negate the need to travel into central London only to travel back out again. This would assist in reducing capacity pressure on the central stations (both rail and underground).
T4: Assessing and mitigating transport impacts	The Council supports the policy.
T5: Cycling	The Council agrees with ensuring adequate facilities for cycle storage for future developments.
T6: Car parking	The Council supports this policy.
T6.1: Residential parking	The Council supports this policy.
76.1(C)	
T6.2: Office Parking	The Council supports this policy.
T6.3 Retail Parking	The Council supports this policy.
T6.4: Hotel and leisure uses parking	The Council supports this policy.
T6.5: Non-residential disabled persons parking	The Council supports this policy.

Chapter 10	Transport
London Plan Policy	Comments
T7: Freight and Servicing	The Council supports this policy.
T8: Aviation	The Council supports this policy.
T9: Funding transport infrastructure through planning	The Council supports this policy. Haringey would note that Outer London Borough's do not currently directly benefit from Mayoral CIL, in terms of the improvements to public transport or other forms of sustainable transport infrastructure (improved cycle ways etc). The Council would support Mayoral efforts to bring Crossrail 2 to Haringey.

Chapter 11	Funding the London Plan
London Plan Policy	Comments
DF1: Delivery of the Plan and Planning Obligations	The Council supports this policy.

Chapter 12	Monitoring
London Plan Policy	Comments
M1: Monitoring	The Council supports this policy.