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Dear Clodagh

Haringey's Local Plan: Strategic Policies (formerly Core Strategy) – (implications of the recently published National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites).

Thank you for consulting us on the implications of the National Planning Policy Framework (NPPF) and Planning Policy for Traveller Sites on the Local Plan: Strategic Policies (formerly Core Strategy). We have no comments on the implications of the Planning Policy for Traveller Sites so our comments below just relate to the NPPF.

We are content with the conclusions you have reached in testing whether your policies are in line with the NPPF. We have no specific comments on policy SP11 Good Design and the saved policies (ENV7 and ENV11) that deal with pollution aspects. More detailed comments in relation to policies SP5 and SP13 follow.

Water Management Policy SP5

The NPPF has retained the main principles of Planning Policy Statement 25: *Development and Flood Risk*. We are content with the conclusions reached in the Topic Paper (page 11) and the LPA Self Assessment that the policy is consistent with the NPPF. The minor amendments made to policy SP5 are appropriate as listed in the Schedule of Modifications (NPPF).

We would like to bring to your attention a minor modification you may have overlooked. In the policy wording of SP5 (page 63 of the latest version of Local Plan: Strategic Policies), third bullet down it reads as follows:

All development within these areas will take account of flood risk vulnerability classifications as set out in Table D.2 in PPS25 and will apply the PPS25 Sequential Test and Exceptions Test.

Since PPS25 has been superseded by the NPPF, Table D.2 no longer exists, but has been replaced with Table 2 in the Technical Guidance to the NPPF. Though in fact it may be appropriate to reference Tables 1-3 as all three contain relevant guidance that will help Local Authorities apply the sequential test.

We are encouraged by the commitments to further work to assess flood risk and



adopt a sequential approach to future local plans, as outlined in paragraph 4.2.6 of the Local Plan: Strategic Policies. It is worth noting that future flood risk work undertaken by the Council should incorporate the use of their Surface Water Management Plan. This is to ensure that key actions identified to alleviate surface water flood risk in Haringey are recognized where appropriate in developing development control policies and form part of the selection process for site allocations. We would welcome early engagement with your team on undertaking a level 2 SFRA, sequential testing of site allocations and development management policies.

Open Space and Biodiversity Policy SP13

We agree that this policy conforms to the NPPF as it is generally consistent with the aims of planning for biodiversity and through policies minimizing the impacts. Perhaps the only lacking element is outlined in the second criteria of paragraph 117 of the NPPF which reads as follows:

To minimise impacts on biodiversity and geodiversity, planning policies should:

- *identify and map components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation;*

This is just an observation, we have no major concerns with this and perhaps this mapping element is laid out as part of the key evidence for policy SP13. Mapping out the areas as suggested in the NPPF paragraph 117 that require biodiversity protection and enhancement in the borough could support the forthcoming development management policies.

Please also note the requirements of the Water Framework Directive and the Thames River Basin Management Plan. There are five stretches of watercourse recognized within the Thames RBMP where the current status is moderate. The requirement through WFD is that these should reach good ecological status or potential by 2027. Some stretches of watercourse coincide with the growth areas in Haringey. There will be actions and measures identified in the Thames RBMP that can contribute to improving biodiversity and water quality and could form part of relevant policy criteria. The Thames RBMP should form part of the evidence base for development management and site allocations policies.

If you have any queries regarding our comments please contact me.

Yours sincerely

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