

Ms Ciara Whelehan
Planning Policy Team
London Borough of Haringey
639 High Road
London
N17 8BD

Our ref: NE/2006/000070/CS-01/SB1-L01

Date: 21 June 2010

Ldf@haringey.gov.uk

Dear Ms Whelehan

Core Strategy Proposed Submission Consultation

Thank you for consulting us on the submission stage of the Core Strategy. We have highlighted with reference to paragraph or policy numbers elements that require change or we support. Please note that we find policies SP1 Managing Growth and SP5 Water Management and Flooding unsound as they are not consistent with national policy – Planning Policy Statement 25: Development and Flood Risk (PPS25). Further details are provided in this response. There are a number of paragraphs and policies we do support and in some cases have suggested changes to improve the wording or aims.

Section 1.3 Making Haringey Distinctive

Paragraphs 1.3.4-1.3.10 Tottenham and Seven Sisters Area Assembly

This area is located in an area at high risk of flooding and this fact should be included in the description. Paragraph 1.3.10 should make reference to the Water Management and Flooding policy.

The 'Opportunities Section' should include the opportunity to reduce flood risk and restore/enhance the Pymmes Brook, Moselle Brook and River Lee.

Paragraphs 1.3.11-1.3.15 Crouch End Area Assembly

We support the opportunity to preserve and enhance conservation areas and green spaces as important issues for this area.

14/1/10
10 669

14/2/10
10 669

16/1/1-3

Paragraphs 1.3.16-1.3.19 West Green and Bruce Grove Area Assembly

10670

These areas are located in zones at risk of flooding (flood zones 2 and 3). Reference to this fact should be made in the description. Paragraph 1.3.19 should refer to the Water Management and Flooding policy.

lordship lane sec - works p 24

We support the opportunity identified to open up the River Moselle and welcome the opportunity to comment on any such proposals. In addition, there is the opportunity to reduce flood risk through the sequential approach and use of SUDs.

16/4/1.3

Paragraphs 1.3.20-1.3.24 White Hart Lane and Northumberland Park Area Assembly

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These areas are located in an area at high risk of flooding which should be referenced within the description. Paragraph 1.3.24 should refer to the Water Management and Flooding policy. Opportunities should include flood risk reduction and restoration of the Moselle Brook.

p 27

16/5/1.3

Paragraphs 1.3.25-1.3.28 Wood Green Area Assembly

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The opportunity to restore the Moselle Brook to reduce flood risk and improve green infrastructure should be included in the Opportunities box.

p 30

16/6/1.3

Paragraphs 1.3.30-1.3.33 St Ann's and Haringey Area Assembly

10673

The Opportunities should include the restoration of the Stonebridge Brook to reduce flood risk and improve green infrastructure.

p 33/35

16/7/1.3

1.3.34-1.3.37 Muswell Hill Area Assembly

10674

We support the opportunity identified to preserve and enhance the conservation areas and green spaces as important issues.

16/8/1.4

Section 1.4 Challenges facing Haringey

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Climate Change (Paragraphs 1.4.20-1.4.24)

We generally support this section.

p 43

We welcome the inclusion of paragraph 1.4.24 which makes reference to the flood risk zones in the context of climate change in light of our previous comments (EA response to Core Strategy Preferred Options dated 25 June 29). However, we do not think this paragraph goes far enough to reflect the Council's approach to flood risk which should be avoiding inappropriate development in flood risk areas by applying the Sequential

Test. This relates to our response to policy SP1. The paragraph should be amended to the following:

'Parts of the borough are in flood risk zones and the Council will take a strategic, risk-based approach to avoid placing inappropriate developments in areas at risk of flooding by applying the PPS25 Sequential Test and Exceptions Test. Mitigation and adaptation measures have an important role in managing the impact of future climatic changes.'

good change

Section 1.5 Vision and Objectives

Strategic Objectives (section 1.5.6)

p 50 -

We support the objectives listed for 'An Environmentally sustainable future' particularly those related to climate change, flood risk, water stress, land contamination and the main rivers (Pymmes Brook, Moselle and Lee).

Section 3.1 Managing Growth

16/9/2-1

Policy SP1 – Managing Growth

carry out exemption test

We find this policy **unsound** because it is not consistent with national planning policy, Planning Policy Statement 25: Development and Flood Risk (PPS25). The Sequential Test and Exceptions Test have not been undertaken by the Council, based on the evidence of their SFRA, to inform the location of the Growth Areas and Areas for Change. Therefore since this policy has not been informed by the Sequential Test, the policy is not justified.

The Tottenham Hale/Seven Sisters, West Green/ Bruce Grove and White Hart Lane/Northumberland Park are areas that include flood risk zones 2 and 3. PPS25 is clear that it is the role of the decision-maker when allocating land in spatial plans to apply the Sequential Test to steer new development to flood zone 1, and that only where there are no reasonably available sites in flood zone 1 to consider flood zone 2 and then flood zone 3 (paragraphs 16, 17 and D5). Given the above, the policy would also be contrary to PPS12: Local Spatial Planning, paragraph 4.52 as to be sound the policy should be consistent with national policy.

We note the supporting document entitled 'Draft flood risk (PPS25) Sequential Test for Potential Housing Sites in Haringey.' This document makes reference to the Haringey SFRA and states that the development of the SFRA as it applies to Haringey is on-going and will be directly applied for sites identified within the Haringey Core Strategy. The document is a template used to develop the Flood Risk Assessment Sequential Test process set out in the Environment Agency's Flood Risk Standing Advice. It also states that the document aims to inform the process of site specific flood risk assessment and the required sequential testing. This document is not a Sequential Test applied by the

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Council to the Core Strategy development areas, but a template to be used at individual site level based on the guidance provided on the Environment Agency's website. Therefore, at this stage of the Core Strategy, this is insufficient as a Sequential Test when it does not constitute the Council's application of the Sequential Test at the strategic level and the Exceptions Test, where necessary.

At preferred options stage we did outline our position explaining that we could not agree to policy SP1 as a Sequential Test has not been undertaken and as such areas of growth have been allocated without a sufficient evidence base (letter dated 25 June 2009).

We recommend that to overcome this issue the Council applies the Sequential Test (and Exceptions Test if required) to the identified Core Strategy Growth Areas and Areas of Change. The Sequential Test would also need to be applied to the site allocations. The application of these tests using the guidance in the PPS25 and the Practice Guide ensures that flood risk has been considered at the strategic level of planning with the aim of reducing flood risk. The outcome of the Sequential Test should inform policy SP1 and the policy wording should make reference to the Sequential Test and flood risk. The supporting text of this policy should make it clear how the Sequential Test has been applied, and met, and also explain under what circumstances (and where) the Exceptions Test would still need to be applied. We are prepared to support the Council with help and guidance as necessary in undertaking this work.

16/11/14
The Sequential Test is a requirement of national planning policy and not solely an Environment Agency requirement. The Sequential Test template provided on our website is a guide to help Local Planning Authorities and Developers carry out the test at individual site level. The template produced does have value in helping the Sequential Test to be applied for windfall sites and in assisting the Council in developing the Sequential Test.

Paragraph 3.1.5 – this paragraph should make reference to flood risk.

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Chapter 4: An environmentally sustainable future

4.2 SP5 Water Management and Flooding

— informed by sequential test

Although this policy includes some positive aims, we think the policy should be amended before we could give it our support and our suggestions for this are explained below. As this policy has not been informed by the Sequential Test carried out by the Council, we find the policy **unsound** as it is not consistent with PPS25. The policy includes a number of criteria related to flood risk, but neglects water management as an issue. We also think the policy should have a more strategic approach to flood risk and be related to the evidence base e.g. SFRA, Sequential Test and the Thames Catchment Flood Management Plan.

16/1/42

Changes on flood risk — 4.2.4 — ID 657

The introductory paragraph of the policy would be improved if it read as follows: 'The Council will require all development in Haringey to be water efficient during construction and operation and reduce all forms of flood risk.'

ID 640

The Thames Catchment Flood Management Plan has policy messages which could be used to inform the Council's strategic approach to flood risk and inform this policy. One of the criteria could state that all development shall contribute to the long-term flood management targets of the Thames Catchment Flood Management Plan and demonstrate an overall reduction in flood risk. A strong Thames CFMP message is that the floodplain is our most important asset. A criteria should state that through development floodplain areas are protected and flood storage is not impeded. Opportunities to move existing development from within floodplain to areas with lower risk of flooding should be maximised. This should include whether there is potential for land swaps with lower vulnerability uses and identifying, allocating and safeguarding open space for flood storage.

The criteria's requirement that development should 'illustrate how development would contribute to general and flash flooding' is not in line with the aims of PPS25 which seeks to reduce all forms of flooding. This aim is already covered by the criteria requiring that developments assess flood risk, because within that assessment, information on a proposed developments impact on flood risk would be included. Therefore we suggest this is deleted.

- Assess flood risk, in particular sites identified as having higher fluvial flood risk...All development will apply the PPS25 Sequential Test and Exceptions Test.

We support the aim for developments to assess flood risk and apply the Sequential Test and Exceptions test. There is no reference to the fact that flood risk assessments are also required for sites greater than one hectare in size in flood zone 1. The assessment of flood risk is also outlined as a requirement in the Development Management Policies DPD so it may not be necessary to repeat that requirement here. However, the criteria could be more strategic by stating that suitability of land for development and granting of permission should be informed by the SFRA and the Council's Sequential Test. The sequential approach should be applied at site level to place vulnerable developments away from high risk areas and reduce flood risk. This criteria should be amended to reflect this.

- Implement measures to prevent (or mitigate as last resort) local surface water and downstream flooding.

The focus of PPS25 is on reducing flood risk. This criteria should be amended to 'Implement measures to reduce flood risk, protect existing flood defences and incorporate flood mitigation and adaptation measures to respond to climate change.'

We support the facilitation measures the Council have included i.e. SFRA and local Surface Water Management Plan (SWMP). Reference should be made to the Council undertaking the Sequential Test in this section of the policy.

Changes on water management

Our Catchment Abstraction Management Strategy (CAMS) document states that for this area (Water Resource Management Unit 3 – Middle and Lower Lee surface water) the unit is assessed as over-abstracted. This means that in much of the unit the water is scarce, and existing abstraction is causing unacceptable environmental impact at low flows. Therefore there is evidence which supports a strong position on water efficiency in new and existing developments.

The criteria 'Minimise water use and illustrate how development would contribute to general and flash flooding' needs amending so that the water resource issue is treated separately. We suggest that this criteria reads 'Reduce water use by incorporating water efficiency measures in line with the required standards.' Reference to the required standards or targets for water efficiency should be made in the supporting text e.g. paragraph 4.2.3 'water demand' and reference made to where further guidance can be obtained e.g. Development Management Policies DPD or relevant SPD. For non-residential developments we recommend BREEAM standards of Very Good Standard/Excellent Standard. We would support Code Level 3 as a target for all new residential developments.

In addition to this a commitment to the retrofitting of existing developments should be made within this policy. Full refurbishment and/or conversions of existing buildings to residential dwellings should be required to comply with the water efficiency standards.

Support

The policy has some positive criteria which we support which include:

- Improve the water environment, water quality and drainage systems
- Implement Sustainable Drainage Systems...
- Restore and enhance the Blue Ribbon Network...

The above criteria are welcomed and should be retained within this policy.

Flood Risk - Paragraphs 4.2.4 – 4.2.6

Paragraph 4.2.5 should make reference to the Sequential Test. We support the inclusion of SUDS and green roofs in paragraph 4.2.6.

16 | 12 | 47

ID 662

Chapter 6: Safer for all

6.1 SP11 Design

6.1 2

ID

We support this policy and in particular the criteria that all development shall ensure impacts on climate change, natural resources and biodiversity are minimised by adopting sustainable design and construction techniques.

16/13/6

ID 664

You make reference to the aim to have measures to reduce construction waste and water usage which we support in paragraph 6.1.9. Our only comment would be that rather than having design solutions that 'respect wildlife' there should be design solutions that 'protect and enhance habitats for wildlife.'

6.3 Policy SP13 Open Space and Biodiversity

SP13

We support this policy but think the wording should be amended and our suggestions for this are explained below.

16 | 14 | 62

In the supporting text (paragraph 6.3.7) you make reference to waterways which are significant as river corridors form a vital link between open spaces throughout London. We think that reference to river corridors should be made in the actual policy as follows:

ID 665

- Protect and enhance the existing boundaries of the borough's Green Belt, designated Metropolitan Open Land, designated Open Spaces, green chains, allotments, river corridors and all other open spaces from inappropriate development.

We believe river corridors deserve this mention as they are recognised in the London Plan through the Blue Ribbon Network and the London Rivers Action Plan. River corridors have a role to play in enabling the enhancement of biodiversity through development and developers need to realise this through the policy.

We support the following criteria:

Contribution to wildlife and ecological habitats and where possible, include green and brown roofs, rainwater harvesting, green walls, bird and bat nesting/roosting opportunities.

However, we are missing an opportunity if 'buffer zones' and 'river restoration' are not mentioned within this list as these measures provide important gains for biodiversity. These elements should either be added to this criterion or as a separate criterion which makes reference to the Blue Ribbon Network and the London Rivers Action Plan.

10/3/5

Paragraphs 6.3.7 and 6.3.8 – we support these paragraphs.

Additional general comment

There should be some recognition of contaminated land and Planning Policy Statement 23 and the Environment Agency's Groundwater Protection Policy (GP3) within the Core Strategy. The issue of land contamination and the need to protect the water quality of groundwater and surface waters should be mentioned specifically, perhaps in reference to paragraph 1.4.23 'Future challenges' as this refers to the reuse of brownfield sites. Brownfield sites have the potential for land contamination and should be remediated in line with PPS23.

16/15/42

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16/16/1.1

The borough is underlain by London Clay which protects the chalk aquifer but this aquifer is used for the supply of drinking water. There are eight major abstractions in the borough and an additional 5 abstractions close enough that their inner source protection zones underlie Haringey. Deep excavation work that could compromise the clay protection should involve contact with the Environment Agency. Further, developments should ensure measures are incorporated that protect and improve water quality for both surface and ground waters.

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We trust our response is helpful and clear, but if you have any queries please do not hesitate to contact me.

Yours sincerely

Miss Keira Murphy
Planning Technical Specialist

Direct dial: 0207 091 4043

Direct e-mail: Keira.Murphy@environment-agency.gov.uk or
northlondonplanning@environment-agency.gov.uk