

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation 8th January – 4th March 2016

The Council is consulting on four Development Plan Documents (DPDs).

These are the:

- Alterations to the Strategic Policies;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the Word compatible version of this form which is available for downloading from the Council's website www.haringey.gov.uk/localplan.

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they should only relate to the 'tests of soundness' and legal compliance (see guidance note at the back of this form, in the DPDs appendices and on our website for more information).

Complete the form overleaf and return to:

Local Plan team
Level 6, River Park
House,
Wood Green
London
N22 8HQ

Or by email to:

ldf@haringey.gov.uk

Or complete it online at:

www.haringey.gov.uk/localplan

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4th March 2016**.

Next Steps

In the summer of 2016 the Planning Inspector will hold an "Examination in Public" to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

For further information please visit www.haringey.gov.uk/localplan or email ldf@haringey.gov.uk

Ref: (for official use only)	Local Plan Publication Stage Response Form	
-------------------------------------	---	--

Name of the DPD to which this representation relates:

Tottenham Area Action Plan

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:
 Part A – Personal Details
 Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

1. Personal Details ¹	2. Agent's Details
Title	Mr
First Name	Scott
Last Name	Hudson
Job Title (where relevant)	Director
Organisation (where relevant)	Savills (UK) Limited
Address Line 1	Finsbury Circus House
Address Line 2	15 Finsbury Circus
Address Line 3	London
Post Code	EC2M 7EB
Telephone Number	020 3320 8279
Email address	shudson@savills.com

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

3. To which part of the Local Plan does this representation relate?

Paragraph	Policy	Policies Map
Paragraph A of AAP1 and the 1 st bullet point under the Site Requirements heading of SS2:Lawrence Road	AAP1 and SS2:Lawrence Road Site Allocation	

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1) This policy is unsound as it is not effective:

These policies are unclear. It does not give a clear indication to the Potential Developer if the requirement for a masterplan is a separate document or if this would be covered in for example the Design and Access Statement as part of any submission. It is also unclear to what extent (area) does the masterplan need to cover.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

The policy should make it clear in what form the masterplan is required and should set out the parameters of the required masterplan.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature

Scott Hudson

Date:

03/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

10. To which part of the Local Plan does this representation relate?

Paragraph	B	Policy	AAP3	Policies Map	
-----------	----------	--------	-------------	--------------	--

11. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

12. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1)The Policy is unsound as it is not effective.

Policy AAP 3 should be consistency with the other local plan documents. The adopted Policy SP2- Housing and the emerging Policy SP2 (Alterations to the Strategic Policies Pre-submission version January 2016) both indicate how affordable housing shall be achieved subject to viability.

(Continue on a separate sheet/ expand box if necessary)

13. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

Amend the wording as follows (as underlined in bold).

*B The Council will expect affordable housing to be provided in accordance with Policy SP2 of the Local Plan: Strategic Policies and DM13 of the Development Management DPD, with the exception of the affordable tenure split (DM13 A(c)) which in the Tottenham AAP area should be provided at 60% intermediate accommodation and 40% affordable rented accommodation **subject to viability.***

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further

representations based on the original representation at publication stage.

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.

14. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

15. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

16. Signature

Scott Hudson



Date:

03/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

17. To which part of the Local Plan does this representation relate?

Paragraph	C	Policy	AAP3 and SS2 Site Allocation	Policies Map	
-----------	----------	--------	-------------------------------------	--------------	--

18. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

19. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1) This policy is unsound as it is not effective.

Policy AAP3 Paragraph C is unclear. The minimum housing capacities for SS2 Lawrence Road indicates 178 net residential units (under Phase 2). It does not give a clear indication to the Potential Developer or Decision Maker where Phase 2 covers as indicated on the SS2 Site plan. There appears to be no clear evidence base as to where this capacity figure is derived from.

(Continue on a separate sheet/ expand box if necessary)

20. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

Policy SS2 needs to illustrate the Phase 2 area to make it clear to the Potential Developer and Decision Maker that the proposed residential units be referred to as minimum requirements.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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.

21. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

22. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

23. Signature

Scott Hudson



Date:

03/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

24. To which part of the Local Plan does this representation relate?

Paragraph	A) and e)	Policy	AAP5	Policies Map	
-----------	------------------	--------	-------------	--------------	--

25. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

26. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1) This policy is unsound as it is not effective

This policy is unclear. It does not give a clear indication if Policy AAP5 (A) is applicable to the Potential Developer or the Decision Maker. It is the LPA's responsibility to review the Conservation Area Management plans and their boundaries.

(Continue on a separate sheet/ expand box if necessary)

27. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

Policy AAP5 (A) needs to provide clear indication who this is applicable to. This policy should be the responsibility of the LPA and not the Developer/ Applicant.

Amend the wording as follows (as underlined in bold)

e **The Council/LPA should review** ~~Reviewing~~ *Conservation Area Management Plans where appropriate, including reviewing existing boundaries*

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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.

28. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

29. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

30. Signature

Scott Hudson

Date:

03/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

31. To which part of the Local Plan does this representation relate?

Paragraph	4 th bullet point under Site requirements heading	Policy	SS2:Lawrence Site Allocation	Policies Map	
-----------	--	--------	------------------------------	--------------	--

32. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

33. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1)This policy is unsound as it is not effective

This policy is not clear and not precise. It does not provide a clear indication if the junction falls within SS2 site area and the precise location and area.

(Continue on a separate sheet/ expand box if necessary)

34. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

Policy SS2 needs to make it clear to a Potential Developer and the Decision Maker the location and area of the junction, and who's responsibility it is for this reconfiguration.

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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.

35. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

36. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

37. Signature

Scott Hudson



Date:

03/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

38. To which part of the Local Plan does this representation relate?

Paragraph	3 rd bullet point under Development Criteria heading	Policy	SS2:Lawrence Site Allocation	Policies Map	

39. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

40. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1)This policy is unsound as it is not effective:

A flexible approach to existing trees is required in line with the adopted Local Plan Policy SP13 which states:

'All development shall protect and improve sites of biodiversity and nature conservation, including private gardens through its:

▪Protection, management and maintenance of existing trees and the planting of new trees where appropriate; and'

(Continue on a separate sheet/ expand box if necessary)

41. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

This paragraph should be consistent with adopted Policy.
Amend the wording as follows (as underlined in bold)

*The existing street trees are a strong asset to the streetscape and should be preserved,
where appropriate*

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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.

42. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

43. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

44. Signature

Scott Hudson


Date:

03/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation: **Savills (UK) Limited (agent on behalf of the Landowner)**

45. To which part of the Local Plan does this representation relate?

Paragraph	Policy	Policies Map
7 th bullet point under Development Criteria heading	SS2:Lawrence Site Allocation	

46. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Sound	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

47. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

1)This policy is unsound as it is not effective

This policy should be flexible and aligned to adopted Local Policy SP4, where:

'The Council will promote low- and zero-carbon energy generation through the following measures:

- a. Requiring all developments to assess, identify and implement, where viable, site-wide and area-wide decentralised energy facilities including the potential to link into a wider network;*
- b. Establishing local networks of decentralised heat and energy facilities by requiring developers to prioritise connection to existing or planned networks where feasible;'*

(Continue on a separate sheet/ expand box if necessary)

48. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

Changes Required

This paragraph should be consistent with adopted Policy.
Amend wording as follows (as underlined in bold).

*This site is identified as being in an area with potential for being part of a decentralised energy network. This may be as a decentralised energy hub, as a customer, or requiring part of the site to provide an easement for the network, **where feasible.***

(Continue on a separate sheet/ expand box if necessary)

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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.

49. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

50. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

N/A

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

51. Signature

Scott Hudson

Date:

03/03/2016

END

Making a Representation: Guidance Note

Haringey's Local Plan Pre-Submission Consultation

8th January – 4th March 2016

The Local Plan documents have been through a number of stages of consultation. The outcomes of each stage of consultation have in turn informed the next stage of development of the documents. The current stage of consultation offers the final opportunity to comment on the draft documents before it is submitted to the Planning Inspector for Independent Examination.

The previous stages of consultation offered wide opportunity to contribute to the development of the policy documents. As the final drafts, any comments made on the documents at this stage may not result in a change but will be recorded and considered alongside the documents at Examination. This will mean that all comments and representations will be made public. This will be the last stage to comment on the Local Plan documents unless requested by the Inspector.

How to respond to Local Plan documents at this stage?

If you seek a change to any of the document your comments should state clearly what you want changed and why, and you should provide evidence to support these proposals. You should provide wording, where relevant, for the changes proposed.

The documents should be consistent with national and regional policy. If you think this is not the case you should state clearly the reasons why. If you feel that an additional policy should be included in the Local Plan documents, which go against national or regional policy, in order to meet a clearly identified and justified local need, you should state what the local circumstances are and provide supporting evidence.

If you think another policy should be included please ensure the issues are not already addressed in:

- national or regional policy; or
- in the other Local Plan documents.

If the issues are not addressed elsewhere, please state why your suggested policy should be included in the specified Local Plan document and what it should say.

The Local Plan documents must meet two key criteria before it can be submitted and adopted. During Examination the Planning Inspector will only consider comments which refer to these criteria. Therefore, when making representations please keep in mind the following:

Has the Local Plan documents met the following legal requirements?

Has it been prepared in accordance with the Local Development Scheme, which sets out the work programme for the Local Plan?

Is it in compliance with the Statement of Community Involvement, which sets out how the Council will involve the community in the preparation of planning documents and in considering planning applications?

Has it been subject to a Sustainability Appraisal to examine the social, economic and environmental impacts of the policies?

Does it have regard to national policy?

Does it conform generally with regional policy as set out in the London Plan?

Is it in line with the objectives set out in Haringey's Sustainable Community Strategy?

Are the Local Plan documents sound?

- Is the document justified?
 - Is it based on robust and credible evidence?
 - Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
 - Is it deliverable?
 - Is it flexible?
 - Will it be able to be monitored?
- Is it consistent with national policy?

Further detailed guidance on how to respond to the documents can be found in the appendices of each document.

Please note that all responses received will be made publically available.

All responses must be received by **5pm 4th March 2016**