

## Haringey Local Plan Pre-submission Response Form

### Pre-Submission Consultation 8<sup>th</sup> January – 4<sup>th</sup> 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](http://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](mailto:ldf@haringey.gov.uk)

Or complete it online at:

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

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4<sup>th</sup> 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](http://www.haringey.gov.uk/localplan) or email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Ref:  (for official use only)	<b>Local Plan</b> Publication Stage Response Form	
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Name of the DPD to which this representation relates:

<b>Tottenham Area Action Plan</b>
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**Please return to London Borough of Haringey by 5pm on Friday 4<sup>th</sup> March 2016**

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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.

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## Part A

	1. Personal Details <sup>1</sup>	2. Agent's Details
Title	-	Mr
First Name	-	Scott
Last Name	-	Hudson
Job Title (where relevant)	-	Director
Organisation (where relevant)	<b>Empyrean Developments and Paul Simon Magic Group</b>	<b>Savills (UK) Limited</b>
Address Line 1	-	<b>Finsbury Circus House</b>
Address Line 2	-	<b>15 Finsbury Circus</b>
Address Line 3	-	<b>London</b>
Post Code	-	<b>EC2M 7EB</b>
Telephone Number	-	<b>020 3320 8279</b>
Email address	-	<b>shudson@savills.com</b>

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<sup>1</sup> 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	Gourley Site Allocation (Page 64 and 65)	Policy	SS4	Policies Map	
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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.

Site Allocation Gourley Triangle (SS4) provides indicative development capacity figures for the Gourley Triangle site. On behalf of the Applicant we wish to contest these figures, where Policy SS4 is considered unsound as it is not justified or effective.

### 1)The policy is unsound as it is not justified

The Site was identified for redevelopment in Haringey's Site Allocations DPD January 2014 Consultation Document as THR9- Gourley Place & Wickes Site. This outlined a potential development capacity for 54,000m<sup>2</sup> of residential and 22,000m<sup>2</sup> of commercial development.

In February 2015 an evidence base study was undertaken by GVA on behalf of Haringey Council to support their Local Plan preparation titled; *London Borough of Haringey Site Allocation Viability Assessment - February 2015*. This outlined that the Gourley Triangle Site has the potential to provide 213 residential units (based on an average unit size of 70sqm GIA) and 4,976sqm of business space.

The indicative figures for this site are significantly different between the DPD January 2014 Consultation Document and the Allocation Viability Assessment - February 2015. Viability is a subjective matter and it may not always be possible to rely on the conclusions of the third party. The two key issues here are firstly that the Policy SS4 indicative development capacity figures do not reflect the evidence base study undertaken, where the figures for Policy SS4 do not correspond to the Allocation Viability Assessment - February 2015.

Secondly, the evidence base does not provide a clear reason for the significant difference between the two indicative capacity figures for the DPD January 2014 Consultation Document and the Allocation Viability Assessment - February 2015.

## 2) The Policy is unsound as it is not justified

The London Plan 2015 density matrix indicates that in urban locations a density of 200-700 habitable room per hectare or between 70- 260 units per hectare is acceptable. Given the site area at approximately 2.0ha the figure of 191 net residential units is low. Based on this figure this assumes an equivalent figure of 1ha = 95.5 units. This is within the density range, however is considerably low and does not fully satisfy London Plan objectives, where:

Paragraph 3.19 of the London Plan states: *'In addition, the process of managing the release of surplus industrial land should focus on bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development'*.

It is considered that the indicative development capacity figures for both residential and commercial are too low and do not reflect the London Plan objective to deliver 'high density development' in areas with good public transport, where the Gourley site has PTAL rating of 5.

## 3) The Policy is unsound as it is not effective

The indicative development capacity figures are not consistent with emerging policy objectives, where:

The commentary provided in SS4 Policy specifically highlights that: *'the Council is seeking to encourage redevelopment of the area to introduce a range higher density employment uses'*.

Furthermore Policy AAP3 of the emerging Tottenham Area Action Plan outlines that: *'Higher densities and capacities may be acceptable in appropriate locations, close to town centres, in areas with good local facilities and amenities and in areas well served by public transport, providing the other policies of this AAP and Haringey's Local Plan are not compromised'*.

The current indicative development capacity figures as outlined in Policy SS4 do not reflect the objective of higher density employment uses. It is considered that the Gourley site has the potential to deliver a mixed use proposal:

- The site has the potential to deliver approximately 9,000 – 12,000sqm of commercial floorspace.
- The site has the potential to deliver approximately 600 – 700 residential units.

(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 indicative development capacity figures as outlined in SS4 need to be changed to reflect the reasons as outlined above. The indicative capacity figure needs to be flexible and non prescriptive, setting out a minimum figure for both residential and commercial development.

(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>A</b>	Policy	<b>AAP1</b>	Policies Map	
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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) This policy is unsound as it is not effective.**

Policy AAP1 is 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)

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**

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.**

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  Policy  Policies Map

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

4.(1) Legally compliant	Yes <input checked="checked" type="checkbox"/>	No <input type="checkbox"/>
4.(2) Sound	Yes <input type="checkbox"/>	No <input checked="checked" type="checkbox"/>
4.(3) Complies with the Duty to co-operate	Yes <input checked="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)The Policy is unsound as it is not effective.**

Policy AAP 3 should be consistence 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)

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**

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.**

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	<b>A) and e)</b>	Policy	<b>AAP5</b>	Policies Map	
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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)

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**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

**END**

## **Making a Representation: Guidance Note**

### **Haringey's Local Plan Pre-Submission Consultation**

**8<sup>th</sup> January – 4<sup>th</sup> 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?

Further detailed guidance on how to respond to the documents can be found

### **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?

in the appendices of each document.

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

All responses must be received by **5pm 4<sup>th</sup> March 2016**