

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	
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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	Mr
First Name	Michael	Steffan
Last Name	Orr	Rees
Job Title (where relevant)		Associate
Organisation (where relevant)	Muse Developments and the Canal and River Trust	Quod
Address Line 1		Ingeni Building
Address Line 2		17 Broadwick Street
Address Line 3		London
Post Code		W1F 0AX
Telephone Number		020 3597 1000
Email address		Steffan.rees@quod.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: Quod

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

Paragraph	Table 6	Policy	AAP4 AND TH9	Policies Map	
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4. Do you consider the Local Plan is (tick):

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

This response relates to the lack of clarity and inconsistencies in relation to:

- § the definition of “replacement floorspace” and “replacement employment”;
- § indicative development capacities;
- § the lack of clear guidance on the timescales and strategy for the reclassification of Designated Employment Areas.

Accordingly, without such clarity and with such inconsistencies, the Plan is unsound, ineffective and not therefore deliverable over the plan period.

Please refer to the accompanying cover letter (part (b) (i)) for full and more detailed comments.

(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.

1. There needs to be consistency in the terminology for “replacement floorspace” or “replacement employment” with a definition to provide clear guidance on the policy test for development proposals;
2. Inconsistencies between indicative development capacities should be corrected;
3. The timescales and strategy for the reclassification of Designated Employment Areas should be provided.

Incorporating such changes will make those policies effective and deliverable over the plan period.

(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

Muse and CRT are bringing forward a site forming part of a Strategic Allocation in the Borough. This will bring a number of regeneration benefits and could act as a catalyst for unlocking other development parcels within the Site Allocation. These representations relate to the effectiveness and deliverability of the Site Allocation and as such respectfully request the opportunity to support their points at examination.

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

[Redacted Signature]

Date:

4.3.16

Part B – Please use a separate sheet for each response

Name or Organisation: Quod

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

Paragraph	<input type="text"/>	Policy	AAP1 AND TH9	Policies Map	<input type="text"/>
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2. Do you consider the Local Plan is (tick):

4.(1) Legally compliant	Yes <input 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 type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

3. 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.

The meaning of “comprehensiveness” should be sufficiently clear so as not to prejudice the development aspirations of component parts of Site Allocations to be realised (particularly where there are multiple development parcels within Site Allocations).

It should be clarified that in relation to Site Allocation TH9, “comprehensiveness” means that the various development parcels can come forward individually. The lack of clarity could prejudice the ability to deliver important and component parts of the Site Allocation and is therefore ineffective and could undermine the deliverability of the Site Allocation over the plan period.

More detailed comments are provided in the accompanying cover letter (part (b) (ii))

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

4. 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.

It should be made clear that in relation to Policy TH9 that “comprehensiveness” does not mean that the entire Site Allocation must be developed at the same time. The policy should be amended and clarified to allow sufficient flexibility for the development aspirations of components part of the Site Allocation to be realised, particularly given the different policy designations affecting component parts.

Making such amendments will ensure an effective policy that allows multiple development parcels within Site Allocations to be developed comprehensively but not prejudice the ability to deliver important and component parts independently.

(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.

5. 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

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

Muse and CRT are bringing forward a site forming part of a Strategic Allocation in the Borough. This will bring a number of regeneration benefits and could act as a catalyst for unlocking other development parcels within the Site Allocation. These representations relate to the effectiveness and deliverability of the Site Allocation and as such respectfully request the opportunity to support their points at examination.

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.

7. Signature

Date:

4.3.16

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?

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 4th March 2016**

Part B – Please use a separate sheet for each response

Name or Organisation: Quod

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

Paragraph	<input type="text"/>	Policy	TH9	Policies Map	<input type="text"/>
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2. Do you consider the Local Plan is (tick):

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Please tick as appropriate

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The 'Development Guidelines' within policy TH9 fail the soundness test with regards to consistency with national planning policy.

The guidelines state that building heights will have to respond to the proximity and openness of the greenbelt. Paragraph 79 of the National Planning Policy Framework (NPPF) addresses green belt, however there is no specific policy requirement in the NPPF in relation to the setting of the green belt, and in this respect the NPPF itself does not provide guidance in respect of sites adjoining the green belt.

Please refer to the accompanying cover later (part (b) part (iii)).

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

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The 'Development Guidelines' on page 129 needs to be made clear that only the garage site (which currently lies within the greenbelt) should respond to the openness of the green belt. All other proposals should respond to other relevant policies within the local development plan documents.

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