

Clodagh McGuirk  
London Borough of Haringey

**Our ref:** NE/2006/000070/CS-04/PO2-L01

**Date:** 23 March 2016

By email: [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Dear Clodagh

### **Local Plan Pre-Submission Regulation 19 consultation**

Thank you for consulting us on the following Local Plan consultation including the following documents:

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

We have filled out a response form for each of the above documents and referred to relevant evidence base documents where appropriate (Strategic Flood Risk Assessment, Sequential Test and Sustainability Appraisals). The response forms are attached to this email. Overall we are pleased to see that the majority of our comments have been taken on board and we feel that the Development Management Policies in particular are very strong.

As you are aware, the Strategic Flood Risk Assessment was not made available to us until 7 March 2016, after the formal response deadline of 4 March 2016. We requested this document several times both in writing (4 February, 15 February, 18 February) and over the phone, and at the time of requesting the SFRA you agreed to an extension to provide our comments. We are therefore very concerned to learn that your authority may make the decision that our representations may no longer be taken into account because they have been received after the deadline.

We strongly urge you to take account of our representations as we feel have acted in good faith and tried to work with you under the Duty to Co-operate. We have specifically held off making our formal response until we had received all of the evidence documents, in order that we could minimise the risk of having to find the plan unsound.

Our specific comments are within the attached representation forms and we would like to provide the following general comments.

#### **Strategic Flood Risk Assessment**

There are several sites which still state an incorrect flood zone and grid reference. It is imperative that you revisit the SFRA to check that the flood zones referred to are as up to date as possible. Currently it is difficult to cross reference some sites with the Site

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Allocations document and Sequential Test and some sites state different flood zones between the documents, which may cause confusion when sites are brought forward as planning applications.

To reflect the fact that flood zones change over time as modeling is refined, it may be sensible to outline this in the main body of the SFRA and make applicants aware that they should check the Environment Agency Flood Maps for the most up to date information.

### **Sequential Test**

We are pleased to see that the sequential test has now been made available on your website along the other evidence documents. Although many of our comments have been taken on board, the site IDs and names remain unchanged, which again has made it difficult and more time consuming when cross-referencing all of the documents.

It is also disappointing that you have not considered our previous comments regarding sites which fall within Critical Drainage Areas and considered all forms of flooding in the sequential test. Additionally there could be much greater clarity as to the criteria that have been used to select the sites which have been sequentially tested.

We are pleased that site SA52 (Pinkham Way) has now been included in the sequential test. As outlined in the response form, the Site Allocations documents should reflect the wording in the sequential test and be clear that no more vulnerable development will be permitted in areas of Flood Zone 3.

We note that the Development Management DPD now includes reference for sequentially testing windfall sites in the supporting text.

### **Tottenham Area Action Plan**

Whilst there is no reference to flood risk, water resources or biodiversity in the overarching policies of the action plan, we are satisfied that management and mitigation of the potential negative effect of flooding can be provided by the Borough-wide flood risk management policies in the DM Policies DPD. Therefore we have not requested additional wording in the AAP.

We have reviewed a number of site allocations that fail to identify the correct level of flood risk, and groundwater sensitivity. This is required to ensure that these sites are submitted with the appropriate level of assessment, in line with the guidance in the NPPF.

Furthermore a number of site allocations have failed to acknowledge the presence of culverted main rivers on site, or made reference to the need for deculverting in their site guidelines. Deculverting is a key Water Framework Directive action for much of the Moselle Brook in Tottenham, and failure to secure improvements in the river prevents reductions in flood risk, and important ecological gains in the area.

Yours sincerely

**Mrs Jane Wilkin**  
**Planning Advisor**

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