

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:

Alterations to Strategic Policies

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	Ms	
First Name	Rachel	
Last Name	Allison	
Job Title (where relevant)	Chair	
Organisation (where relevant)	Highgate Neighbourhood Forum	
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
Email address		

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: Highgate Neighbourhood Forum

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

Paragraph	Alt 64 Section 3.2 para 3.2.29	Policy	SP2 Haringey' Housing Estate Renewal	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 type="checkbox"/>
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.

Highgate Neighbourhood Forum consider the alterations to SP2 suggested at Alt64 (Haringey's Housing Estate Renewal) to be unlawful and unsound. The reasons for this are summarised as:

- The policy is unlawful because it has not been prepared in accordance with the LPA's statement of Community Involvement.
- The Policy is not justified because it has not been prepared with the participation of the local community and others having a stake in the area.

The Policy has not been prepared in accordance with Haringey's Statement of Community Involvement

Alt 64 has been completely rewritten following the 'preferred options' consultation (Jan 2015), ostensibly in response to representations made during the consultation. In effect this is a completely new policy paragraph, which abandons the principle of estate regeneration and replaces it with 'estate renewal'.

The previous version the policy expressed that '*the driver for estate renewal is to improve the quality of the existing social housing stock*' (my emphasis). The new version is instead motivated by the need to 'meet housing need', 'provide greater housing choice' and 'cross-subsidise the costs of modernising the existing housing stock'.

This is the first time that stakeholders and the local community have been consulted on the inclusion of a policy that allows councils to 'renew' housing estates, even if the estates/housing units themselves are not in need of renewal or regeneration. It is the first time that a policy has included the idea of 'cross subsidy' and the capitalisation of council-owned assets.

The policy alteration also proposes to include a new paragraph (in effect a new strategic policy) to justify the use of council owned land for 'infill development'. This policy does not include a commitment to build new social or even 'affordable' housing on these council owned sites, but simply includes a provision for *low cost home ownership*. *This term is not defined in the plan and its use is misleading and confusing.*

We consider that this proposed alteration does not take into account the views of respondents to the previous consultation and seeks to introduce a new strategic policy, which has not been subject to the full ('preferred options) consultation. We therefore consider this alteration to be counter to the SCI and therefore to be unlawful and the document legally non-compliant.

The Policy has not been prepared with the participation of the local community and others having a stake in the area.

For the reasons detailed above we also consider the document to be unsound, in that Alt 64 of the strategic policies has not been prepared with the participation of the local community.

(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.

The new policy, which replaces 'improving the quality of existing social housing' with 'increasing housing provision' as the driver for estate regeneration/renewal should be removed. Policy wording should make it clear that demolition and re-provision of social housing and social housing estates will only take place when there is an overriding need for the estate/and or housing to be regenerated or renewed.

If the council wishes to include this new policy of estate renewal in the Strategic Policies DPD, the policy should first be subject to a full consultation in accordance with the SCI.

The new policy paragraph introducing the idea of infill on council owned land should be deleted. This is a new policy of 'infill', does not belong in estate regeneration or renewal and has not been consulted upon in accordance with the SCI.

(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

The forum area contains some examples of successful social housing estates with cohesive communities. We are anxious to secure the future of these estates and their residents and are concerned that the high land values in the forum area may see our social housing being capitalised at the expense of the existing communities. We are concerned that this new policy amendment has not been subject to adequate consultation and we respectfully request that our views are heard at the inspection.

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

Rachel Allison

Date:

4th March
2016

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**