

## Appendix 2.0 - General comments on the Local Plan: Strategic Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
408	DM1	Mario Petrou	Objection to national government interference in local policy making	Imposition of national and regional policy and targets ignore local considerations of every local policy aim. Reference made to planning application approval at St Ann's Hospital which ignored the council's duty to preserve and enhance heritage assets.	The Local Plan must be consistent with the National Planning Policy Framework and in general conformity with the London Plan. The Local Plan will be tested at independent examination and found unsound if it does not meet these requirements. The Council has set out locally specific approaches to planning for and managing development within the national and regional policy framework.
408	DM2	Mario Petrou	Consultation period	Given the number of documents consulted on, communities would have been better served if the consultation began in January. Some of the documents have were clearly finished in Autumn 2014	The Local Plan consultation was carried out in line with the Council's adopted Statement of Community Involvement, Local Development Scheme (LDS) and Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
408	DM3	Mario Petrou	General support for the aims of the Development Management DPD	Generally support the aims of the DPD	The Council welcomes support for the aims of the Local Plan.
258	DM4	Ladder Community Safety Partnership	Council policies	Responses based on two straight forward principles drawn from Haringey's own long establish policies. Future development will not worsen the quality of life for those living and working in Haringey (Saved UDP, UD3) and non of existing policies which are designed to protect residential amenity should be in any way weakened or compromised and where possible strengthened.	The DM Policies Local Plan will set out further detailed policies to assist in delivering the adopted Strategic Policies. The Local Plan will update the Council's suite of planning policies to ensure they are consistent with the national and regional planning policy framework, and through this process replace the remaining saved Unitary Development Plan policies set out in Annex 1 of the Strategic Policies. The Council considers that the proposed policies will ensure that residential amenity is appropriately protected.
258	DM5	Ladder Community Safety Partnership	Density	While need for housing is self evident this should not be achieved by over-development and cramming in of small, high density units. Overcrowded and dense development do not foster community cohesion and wellbeing and tends to lead to anti social behaviour and crime and at the very least the serious loss of amenity for both new and existing residents	In order to meet Haringey's housing target it is essential that the development capacity of sites is optimised. The Council will apply the London Plan policies on residential density and its density matrix, which sets out a benchmark of appropriate densities based on transport accessibility and broad locational settings. Further consideration will be given to site circumstances and local context, so that densities achieved on sites will assist in delivery of the spatial strategy.
258	DM6	Ladder Community Safety Partnership	Housing targets	Policies are being driven by attempts to meet unrealistic targets, i.e. Site allocations sets out revised London Plan targets. However in housing section of DM policies the target has become a requirement driving all before it.	The Local Plan must be consistent with the National Planning Policy Framework and in general conformity with the London Plan. The Local Plan will be tested at independent examination and found unsound if it does not meet these requirements. The Council has set out locally specific approaches to planning for and managing development within the national and regional policy framework. The Local Plan aims to meet Haringey's strategic targets, such as for housing and employment.
258	DM7	Ladder	Shisha lounges	As mentioned LCSP welcomes policies to promote community well-being.	The Council welcomes support for Local Plan policies.

		Community Safety Partnership		Concerned no reference to Shisha lounges and the need to ensure planning requirements have been met, especially when a shelter for users is at issue. Urge the inclusion of a policy statement making clear unauthorised development in Shisha businesses will not be tolerated.	Shisha Lounges are considered a Sui Generis use for which planning permission is needed. Unauthorised uses of sites, including for Shisha Lounges, are dealt with by planning enforcement which is outside the scope of the Local Plan. The Council considers that its suite of Local Plan policies, as well as relevant Building Regulations, will ensure this particular use is appropriately controlled.
259	DM8	Archdeacon of Hampstead Fr Luke Miller	Community facilities	The sections on community infrastructure are welcome but there is little <b>evidence of strategic planning for the communities' many and varied needs.</b> Church halls and sometimes the churches are available to the public and thereby provide a significant proportion of facilities available for the <b>community. Your aims of "creating 10,000 additional homes, 5000 jobs and ... community infrastructure," "specifically new schools and healthcare"</b> understate the planning that is needed for successful communities.	The Council recognises the importance of social and community infrastructure in supporting sustainable communities. The Council has prepared and will regularly update an Infrastructure Delivery Plan (IDP), which identifies the service areas where investment will be needed to meet additional demand from growth and development. Community infrastructure is included in the IDP. The Council will work with key stakeholders to assist in delivery of essential infrastructure. In addition, the DM Policies Local Plan sets out policies which seek to protect and enhance provision for community facilities, with places of worship included in the definition of community infrastructure.
634	DM9	Alan Stanton, local resident	Housing mix	The housing proposed in the plans is largely <b>high rise tower blocks 'with the emphasis being on the more affordable end of the spectrum'. (para 5.34). It goes on to say ' the delivery of 1 and 2 bed units will be prioritised in keeping with Tottenham Hale's urban character'. Yet the great need here in Tottenham Hale, as in the rest of Tottenham is for genuinely affordable public housing for families. Introducing a managed, institutionalised private rented sector will do nothing for these families who will be squeezed out as property prices and rents rise.</b>  Tottenham Hale has a high proportion of families living in private rented and temporary accommodation. There is no mention of tenants and their needs in <b>Haringey's "Local Plan Preferred Option Development Management Policies Consultation Document February 2015.</b> The AAP for Tottenham Hale similarly does not mention tenants once, whilst making 46 references to owners. Yet the impact on them of these council proposed policies and plans is extremely serious, especially regarding the singular lack of commitment to genuinely affordable or social housing in these developments.	The aim of the DM policies and the Tottenham AAP is to ensure mixed and balanced communities across all housing tenures in the borough and Tottenham. A better mix of social housing is a mix which provides the opportunity to improve the quality of life of neighbourhoods and improve housing conditions, and one which increases the housing choice and capacity for a range of household sizes, including re-housing families into suitably sized accommodation.  Affordable rented accommodation is by definition (NPPF and London Plan), a social housing product, albeit, charged at rents up to 80% of market rents. In accordance with national policy and the London plan, all new affordable housing will be charged at affordable rents rather than social rents, to be determined on a site by site basis. The priority of intermediate housing is aimed at achieving a better mix of tenures across Tottenham.
422	DM10	Environment Agency	Water Resources	Haringey is located in the Thames Water supply zone and in an area of serious water stress, which does not appear to have been identified in the plan. With such a significant increase in the number of houses, we would expect the AAP and DM DPD to include a policy reflecting the requirements of London Plan policy 5.15 water use and supplies, for residential development to be designed so that water consumption would be at 105 litres or less per head per day. This is supported by the AAP Sustainability Appraisal paragraph 17.15.7. <b>It is Thames Water's responsibility to manage the demand for water. Every five years, Thames Water publishes a Water Resources Management Plan in which they assess future water demand over the next 25 year period. We review and discuss any proposals to meet additional water requirements. The plan put forward by Thames Water has a strong emphasis on demand</b>	The Council recognises the importance of water conservation in delivering sustainable development. Information regarding Thames Water responsibility to manage demand for water is noted. The Council will continue to work with key stakeholders to ensure that growth is appropriately supported by essential <b>infrastructure. Haringey's adopted Strategic Policies Local Plan Policy SP5 (Water Management and Flooding)</b> requires all development in Haringey to be water efficient and paragraph 4.2.3 states that the Council will require the incorporation of water saving measures and equipment in all new development in order to meet London Plan water consumption

				management and water efficiency to help meet future water supply requirements. The Environment Agency does support this approach but it will require others to contribute for these aims to be achieved.	standard of 105 litres or less per head per day. Further guidance on water conservation is also included in the <b>Council's Sustainable Design and Construction Guidance SPD</b> .
426	DM11	Thames Water	Water Efficiency	<p>Water conservation and climate change is a vitally important issue to the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water supports water conservation and the efficient use of water and this issue should be specifically covered in the DPD/Local Plan.</p> <p><i>All new dwellings should meet the water usage targets set out in code for sustainable homes code 3 rating as a minimum.</i></p> <p>Thames Water have a water efficiency website: <a href="http://www.thameswater.co.uk/waterwisely">www.thameswater.co.uk/waterwisely</a></p> <p>By exploring the interactive town, Waterwisely, you can discover how you can start saving water, help protect the environment, reduce your energy bill and even cut your water bill if you have a meter. You can calculate your water use, see how you compare against other Thames Water customers and the Government's target, and get lots of hints and tips on how to save water. Thames Water customers, can also order a range of <b>free devices</b> to help save water. The Policy /supporting text could make reference to this guidance.</p>	The Council recognises the importance of water conservation in delivering sustainable development. <b>Haringey's adopted Strategic Policies Local Plan</b> Policy SP5 (Water Management and Flooding) requires all development in Haringey to be water efficient and paragraph 4.2.3 states that the Council will require the incorporation of water saving measures and equipment in all new development in order to meet London Plan water consumption standard of 105 litres or less per head per day. Further guidance on water conservation is also included in the <b>Council's Sustainable Design and Construction Guidance SPD</b> . The Council will consider further opportunities to inform the public about water conservation information and resources, <b>such as Thames Water's water efficiency website</b> .
426	DM12	Thames Water	Water Efficiency	However, managing demand alone will not be sufficient meet increasing <b>demand and Thames Water adopt the Government's twin-track</b> approach of managing demand for water and, where necessary, developing new sources, as reflected in the latest Thames Water Water Resource Management Plan. Therefore, it is important that the DPD/Local Plan facilitates any necessary new water supply infrastructure (refer to comments on the infrastructure issue).	The Council has prepared and will regularly update an Infrastructure Delivery Plan (IDP), which identifies the service areas where investment will be needed to meet additional demand from growth and development, including for water supply and sewerage. The Council will continue to work with key stakeholders, such as Thames Water, in updating the IDP so as to ensure that growth is appropriately supported by essential infrastructure.
372	DM13	Elspeth Clements, Chairman Highgate Society Planning Committee OBO Highgate Society	Document formatting	Maps produced to support some of the policies are of extremely poor quality rendering them virtually unreadable and, possibly, open to challenge by developers etc. so assumptions have been made which may not be correct.	The Council acknowledges that improvements could be made to the map and image resolutions within the consultation Local Plans. The Council will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.
373	DM14	Highgate CAAC	Policy implementation	It is essential that policies are enforced consistently as the future of heritage assets in Haringey is dependent on this.	Noted. Planning enforcement is outside the scope of the Local Plan.
373	DM15	Susan Rose, Chair of Highgate Conservation Area Advisory Committee (CAAC) OBO Highgate	Document formatting	Reproduction of maps is so poor that the legends are illegible and the colouring seems very erratic and inaccurate as to its location	The Council acknowledges that improvements could be made to the map and image resolutions within the consultation Local Plans. The Council will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.

Appendix D (3) Development Management Policies Document Consultation Statement

		CAAC			
421	DM16	Historic England	Clarity	<p>The following comments have been provided in the context of our previous response letter (dated 10th May 2013) on the Issues and Options for the Development Management DPD. The key headline comments on the current version are set out below:</p> <p>The DPD should be accompanied by clear maps that can help understand the application of key policies. For example policy <i>DM5 Siting and design of tall buildings</i> includes map (2.2) which seeks to illustrate the area considered by the Council as appropriate for tall buildings. The quality of the map provided in the web version of the DPD consultation document is poor and raises concerns that consultation on this issue is incomplete.</p> <p>Greater clarity on policy DM6 locally important views and vistas, in terms of the types of views identified by the Council in its evidence and their management.</p> <p>Further amendments need to be made to policy DM12 Management of the historic environment, so that it complies with the NPPF. Specific areas include issues relating to the potential harm, demolition and justifications for such actions based when balanced against public benefits of a scheme.</p>	<p>The Council acknowledges that improvements could be made to the map and image resolutions within the consultation Local Plans. The Council will aim to ensure that documents are written and presented in a way that are clear to understand and consistent in the future.</p> <p>Policy on Views and vistas has been amended to provide clarity and further guidance.</p> <p>DM12 has been amended to ensure compliance with national policy.</p>
610	DM17	Turley on behalf of St. William	Support policy	<p>We are generally supportive of the principles and comments set out in the Development Management Policies that are not highlighted below. Policy DM 2 'Design Standards and Quality of Life', DM 16 'Housing Supply' and DM 18 'Housing Design and Quality' are especially relevant and provide a good framework that is supportive of residential led developments, such as Clarendon Square</p>	<p>The Council welcomes support for the Local Plan policies.</p>

Comments on the Sustainability Appraisal

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
567	DM18	Page Green Resident's Association	Restricted Conversion Areas/ HMOs	<p>We are opposed to Option 1: 'Restricted conversion area'. <b>We strongly support Option 2: 'No restricted conversion areas'</b>. Our residents association has already had a meeting with Emma Williamson, Head of Development Management and Planning Enforcement, regarding this important matter. She suggested to us that we put our concerns in this consultation document.</p> <p>In our opinion Option 1 became the preferred option of Planning without Planning knowing, or seeking to know, the long Tottenham history of difficulties with Homes of Multiple Occupation that occurs when conversion into flats is seen as less profitable than retaining a large family house and renting out every room at exorbitant prices, often with: whole families living in one room with children sharing bathrooms with unrelated adults who are repeatedly inebriated or worse; over flowing rubbish bins; hot-bedding; prostitution; and drugs.</p> <p>HMOs in our area, at our urging, now have to be licensed. But as Planning Enforcement currently has nobody working in the department and has been understaffed for the past 20 years, enforcement forces the community to put up a superhuman effort to get Planning Enforcement to take action. HMOs</p>	<p>Objection to Option 1 of Sustainability Appraisal reasonable alternatives noted. In order to help support and deliver mixed and balanced communities, the Council has considered a range of housing options across the borough. The DM Policies Local Plan proposes an approach to restrict the conversion of family homes in certain areas and this has been tested <b>against a 'no restriction' approach as part of the sustainability appraisal process</b> in considering reasonable policy alternatives. The appraisal has concluded that there are likely positive effects associated with the proposed policy. The Council considers this policy will help to address local housing need whilst maintaining and improving local character and amenity, without inhibiting its ability to meet its strategic housing target.</p> <p>The concerns regarding HMOs are noted. The Council recognises that HMOs play a part in meeting particular local housing needs. In response to many of the</p>

				<p>are running our neighbourhoods down in every way.</p> <p>On the other hand, residents living in flats, which were converted from houses, are much-appreciated members of our community. We have found flat owners are far more responsible than the transient population and are eager to contribute to the well being of our neighbourhood.</p> <p>In addition, the houses in our neighbourhood are now selling for over half a million. Most people in our area cannot afford these prices. By allowing conversions into flats, Haringey will be increasing the number of affordable housing.</p> <p><b>We, therefore, support Option 2: ‘No restricted conversion area’.</b> (HMO licensing should remain. Measures to discourage developers buying houses to let could be introduced – if only Planning would take that initiative!)</p> <p>We state from long and hard experience that HMOs should be discouraged while home ownership should be encouraged if we want our neighbourhoods improved. <b>Option 2, allowing no restrictions to houses being converted into flats</b>, seems the only way to realistically do this. Discouraging landlords buying houses (and they can offer more money than individual families in our area) and turning them into HMOs.</p>	<p>problems associated with poor quality HMOs, an Article 4 Direction was introduced in November 2013 which removed permitted development rights for conversions to small HMOs within the east of the borough. The proposed Local Plan policy DM23 sets out requirements for HMOs, and this will apply to proposals for HMOs or 6 or more people and smaller proposals within the Article 4 Direction area. The policy will ensure that HMOs are developed to the appropriate standard and positively contribute to their communities. Where developments are in breach of these requirements, this will be dealt with via planning enforcement which is outside the scope of the Local Plan.</p>
567	DM19	Page Green Residents’ Association	Policy too flexible	<p><b>We oppose 23.14 Open space</b> because there are too many let out clauses such as, ‘...that development is not to lead to adverse effects on designated sites and will be protected unless the benefits of new development outweigh nature conservation or scientific interest’; ...’ ensure that development proposals do not lead to the whole or partial loss of open spaces without an <b>assessment of the current level of provision</b>, etc. <b>Who is to decide ‘the benefits’? No, there is too much wiggle room here and we believe it</b> will be taken advantage of. There is too little Open Space already and with so many new homes without gardens, Open Spaces needs to be absolutely ring-fenced.</p> <p><b>In the SA of the Site Allocations DPD report, section ‘Open Space’ it states ‘Haringey’s 2014 Open Space and Biodiversity Study identified that Northumberland Park Ward, Tottenham Hale Ward, part of Bruce Grove Ward, Tottenham Green Ward and east of Seven Sisters Ward have the greatest deficiency in access to open and green spaces. The recommendations include improving provision of small local parks and amenity green spaces as well as access to them and securing new open space in new developments’. Section 23.14 is in contraction to this statement by allowing development on Open spaces in ‘some cases’.</b></p>	<p>Disagree. The Council seeks to protect and enhance open space across the borough, as well as improve access to it. The Council considers that adopted Strategic Policy SP13 and proposed policy DM26 together provide robust policy protection for open space, and further reflect recommendations of the Open Space and Biodiversity Study. The DM policy clearly sets out that the Council will not grant planning permission for proposals that would result in a loss of open space unless it can be demonstrated that the open space is surplus to function. Further, the policy also provides that in areas of open space deficiency, <b>as identified by the Council’s latest evidence, all</b> development proposals will be required to make provision for open space. The SA has referred the Open Space and Biodiversity Study in setting the SA framework for assessing the Local Plan, and Open Space is a criterion against which the Local Plan policies are appraised for likely effects.</p>