

Development Management Policies DPD Regulation 22(1)(c)(v) Statement of Consultation (Pre Submission)

1. Introduction

1.1 Consultation on the Development Management Policies DPD Pre-submission document took place between 8th January and 4th March 2016. Consultation was undertaken in accordance with the Council's Statement of Community Involvement (2011) and in line with regulations of the Town and Country Planning (Local Planning) (England) Regulations 2012. These regulations require the Council to produce a statement (the 'Consultation Statement') setting out the consultation undertaken on the Development Management Policies DPD at the Pre-Submission stage, a summary of the main issues raised in response to that consultation, and to detail the Council's response to comments made.

2. Summary of consultation undertaken on the Development Management Policies DPD Pre-Submission Document

- 2.1 On 23 November 2015, Haringey's Full Council endorsed the Development Management Policies DPD Pre-submission document and resolved to publish the documents for consultation for a period of eight weeks and, following consultation, submission to the Secretary of State for independent examination in public (see [here](#))
- 2.3 Formal notification of the Pre-Submission publication of the Development Management Policies DPD was given on 8th January 2016, and representations were invited for an eight week period ending 4th March 2016. Representations were also invited on the Sustainability Appraisal of the Development Management Policies DPD during this period.
- 2.4 A formal notice setting out the proposals matters and representations procedure was placed in the Haringey Independent newspaper on both the 8th and 15th January 2016 (see **Appendix A**). In addition, on 8th January, a total of 1,582 notifications (see **Appendix B**) were sent by post or email to all contacts on the LDF database (see **Appendix C**), including all appropriate general consultation bodies. Additionally 8,484 properties within Site Allocation boundaries were notified. Addresses outside Site Allocation boundaries were not notified directly, but site notices were placed outside sites. Enclosed with the letter was the Statement of the Representations Procedure (see **Appendix D**). Those emailed were also provided with the web link to the documents on the Council's Local Plan web pages. All specific consultation bodies (see **Appendix E**) were also notified on 8th January 2016. Unless otherwise requested by the consultation body, enclosed with the notification was a hard copy of the Development Management Policies DPD Pre-submission document, the Statement of the Representations Procedure, and the Sustainability Appraisal Report. In accordance with Regulation 21 of the Town and Country

Planning (Local Planning) (England) Regulations 2012, a separate letter was also sent to the Mayor of London requesting his opinion on the conformity of the DPD with the London Plan 2015 (see **Appendix F**).

- 2.5 Hard copies of the Development Management Policies DPD Pre-submission document, the Sustainability Appraisal Report, the Statement of the Representations Procedure and the response form (see **Appendix G**) were made available at the Haringey Civic Centre, the Planning Reception at River Park House, and at all public libraries across the Borough. Additional copies of the Development Management Policies DPD Pre-submission document were also made available at the libraries for short term loan. The documents were **also made available to view and download from the LDF web pages of the Council’s website**. The response form was made available on **the Council’s website for downloading or could be completed and submitted online**. Council’s Facebook and Twitter were also used to advertise the consultation and the dates of the drop-in events held during the consultation period:

Library	Drop In Date and Time
St Anns’s	Monday 18 th January 4 – 7pm
Highgate	Tuesday 19 th January 2 – 5pm
Wood Green	Thursday 21 st January 11am – 2pm
Alexandra Park	Tuesday 26 th January 1- 4pm
Coombes Croft	Wednesday 27 th January 3 – 6pm
Muswell Hill	Thursday 28 th January 4 – 7pm
Stroud Green	Thursday 4 th February 3 – 6pm
Hornsey	Tuesday 2 nd February 3 – 6pm
Wood Green	Thursday 25 th February 4 – 7pm
Tottenham town hall	Tues 9th Feb - 6. 30-8. 30pm
639 High Road Tottenham	Monday 15th Feb - 6. 30-8. 30pm
Ferry Lane Primary school	Tues 16th Feb - 6. 30-8. 30pm
Northumberland Park Residents Association	Wed 2 nd March
Dowsett Estates RA	26 th January

- 2.6 A week prior to the close of consultation a reminder e-mail was sent out to those on the LDF consultation database to remind online consultees of the closing date for making their comments.

3. Duty to Cooperate

- 3.1 Section 110 of the Localism Act inserts section 33A into the Planning and Compulsory Purchase Act 2004. Section 33A imposes a duty on a local planning authority to co-operate with other local planning authorities, county councils and bodies or other persons as prescribed.
- 3.2 The other persons prescribed are those identified in regulation 4 of The Town and Country Planning (Local Planning) (England) Regulations 2012. The bodies prescribed under section 33A(1)(c) are:
- (a) the Environment Agency;
 - (b) the Historic Buildings and Monuments Commission for England (known as Historic England);
 - (c) Natural England;
 - (d) the Mayor of London;
 - (e) the Civil Aviation Authority;
 - (f) the Homes and Communities Agency;
 - (g) each CCG;
 - (h) the Office of Rail Regulation;
 - (i) Transport for London;
 - (j) each Integrated Transport Authority;
 - (k) each highway authority and
 - (l) the Marine Management Organisation.
- 3.3 The duty imposed to co-operate requires each person, including a local planning authority, to:
- (a) engage constructively, actively and on an ongoing basis in any process by means of which activities within subsection (3) are undertaken, and
 - (b) have regard to activities of the persons or bodies (above) so far as they are relevant to activities within subsection (3).
- 3.4 The relevant activities listed under subsection (3) comprises the preparation of development plan documents/local development documents, and activities which prepare the way for and which support the preparation of development plan documents, so far as relating to a strategic matter.
- 3.5 The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Local Plan, including the Development Management Policies DPD, following the approach set out in the NPPF. The mechanisms for and evidence of cooperation and engagement is set out below.

Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How we Cooperated	Outcomes
<p>Neighbouring authorities (see map 1)</p>	<p>Letters sent inviting representations on the DPD at both stages of preparation and responses received. (See Consultation Statements)</p> <p>Planning Officer meetings with:</p> <ul style="list-style-type: none"> • Camden: 19 September 2014, 15 June 2015, 13 May 2014, 26 February 2016 • Barnet: 22 September 2014 • Islington: 19 September 2014 • Waltham Forest: 25 September 2014 • Hackney: 8 October 2014, 6 April 2016 <p>ALBPO Meetings</p> <ul style="list-style-type: none"> • 24 November 2015 • 22 October 2015 • 31 March 2015 • 28 November 2013 • 6 February 2013 	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements</p> <p>Cross boundary issues identified included:</p> <p>Enfield/Barnet: Pinkham Way (partly in Barnet ownership) and potential Opportunity Area at New Southgate, with outcome seeking to keep future options open for wider comprehensive development – TfL also engaged in such discussions. More recently, preparation of joint statement on the importance of this spur of the Crossrail 2 project remaining in the initial funding bid to Treasury.</p> <p>Hackney – South Tottenham Residential Extensions SPD and the potential to prepare a joint SPD at point of next review. Agreement to work on the issue/ concept of warehouse living and access to and through the Harringay Warehouse District.</p> <p>Enfield – relationship between Meridian Water's development and North Tottenham – agreement over sharing of infrastructure requirements and joint provision cross boundary to avoid duplication.</p> <p>Camden – joint response to the Highgate Neighbourhood Plan ensuring consistency of view from the two LPAs</p> <p>Waltham Forest, Enfield & Hackney: Work on the jointly produced (with GLA) Upper Lee Valley Opportunity Area Framework (OAPF) and OAPF</p>

		<p>District Infrastructure Funding Strategy</p> <p>Updates given by respective Borough's on Local Plan progress at All London Borough Planning Officer Group and any cross boundary issues raised. Meetings last held in March - April and are scheduled for every quarter.</p> <p>Hackney & Islington: Joint progression of the Finsbury Park Town Centre SPD.</p>
Environment Agency	<p>Letters inviting representations on the Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Meetings at Council offices:</p> <ul style="list-style-type: none"> • 1 April 2014, 7 July 2014 	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Key area of discussion was regarding sequential testing of proposed development sites in Tottenham. EA provide flood mapping for the Borough. Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>
Historic England	<p>Letters inviting representations on Local Plan documents and Sustainability Appraisal and responses received. (See Consultation Statements for each DPD)</p> <p>Written communications between the Council and Historic England</p> <p>Early engagement in seeking view of Historic England on the heritage policies sent before formal consultation.</p> <p>Meetings at Council offices</p>	<p>Details of representations received and the Council's actions as a result are detailed in the Consultation Statements.</p> <p>Advice on Heritage and Conservation policies given. Heritage policies amended in light of specialist advice. Funding from HE to assist in preparing up to date CAAMs for the six Conservation Areas in Tottenham with focus on ensuring heritage conservation and the regeneration proposals are better integrated. Further HE funding for completion of the Noel Park CAAM, which is part in and adjoins the Wood Green AAP area. Comments received and taken on board on the Sustainability Appraisal scoping and, in later iterations of the appraisal.</p>

Natural England	Letters inviting representations on all Development Plan Documents and responses received. Engagement on SA	Details of representations received and the Council's actions as a result are detailed in the Consultation Statements. Comments received and taken on board on the SA scoping and, in later iterations, the assessment of effects on natural habitats. Assistance with Habitats Regulations Assessment ensuring compliance with relevant EU Directives.
Greater London Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Meetings with Haringey assigned Officer from the GLA to discuss strategic fit of emerging policies GLA Housing Study meetings and work Liaison with specialist officers for policy development regarding affordable housing and sustainability in light of changes to Lifetime Homes etc and London Plan alterations GLA represented on governance boards for the Tottenham housing zone's and the Wood Green AAP . Current engagement on Crossrail 2 spur serving Wood Green. Submitted responses to the Further Alterations to the London Plan consultation.	Details of representations received and the Council's actions as a result are detailed in the Consultation Statements. Officer advice on policy development to ensure there are no conflicts with the strategic London Plan – especially release of industrial land, affordable housing provision and meeting strategic housing requirements. Participation in the London wide SHLAA and SHMA evidence base studies – most recently the call for sites. Agreement to methodology for surveys on Town Centre Health Checks to take place mid-2016. Discussions held, advice, and funding agreed for tall buildings policy work, including the acquisition of 3D model and zmapping. GLA input into brief and commitment to further involvement on subsequent Tall Buildings and Views SPD. Housing Zone confirmed for Tottenham and ongoing work regarding implementation of development schemes in accordance with agreed DCS and High Road West masterplans – including GLA assistance on procurement process for delivery vehicle.
Civil Aviation Authority	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received are provided in the Consultation Statement. No major issues raised. Further engagement likely to be required on the Tall Buildings and Views SPD, which sets upper

		parameters for tall buildings within growth areas.
Haringey Clinical Commissioning Group (CCG)	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Infrastructure Delivery meetings and correspondence.	Details of representations received and the Council's actions as a result are detailed above. Consulted on evidence base documents, and provided information to inform future service delivery, including 'deep dive' for North Tottenham, Tottenham Hale, Green Lanes and Wood Green areas , resulting in floorspace figures for new provision for CCG to take forward to capital bid stage. Continued engagement on healthcare requirements/priorities being reflected in local plan policies, including those that address obesity and mental health.
Homes and Communities Agency	Letters inviting representations on all Development Plan Documents	Details of representations received are provided in the Consultation Statement. No major issues raised
Highways Agency/ Highways England	Letters inviting representations on all Development Plan Documents and responses received.	Details of representations received are provided in the Consultation Statement. No major issues raised
Transport for London	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD) Quarterly 1:1 meetings to discuss all transport related matters. Liaison with TfL regarding transport study modelling and findings Infrastructure Delivery. Meetings and correspondence on specific transport projects. Meetings on Crossrail 2 proposals Engagement on DCF for the Upper Lee Valley OAPF.	Details of representations received and the Council's actions as a result are detailed in the Consultation Statement. Agreed the methodology for transport modelling of broad growth assumptions, and the results of the findings of the study, using TFL data. Consulted on evidence base documents, and provided information to inform future infrastructure provision in particular around Tottenham, including the Station overdevelopment, Bus station Improvements, STAR, cycle superhighway, White Hart Lane station improvements, and Crossrail2. Further engagement on Crossrail 2 following Council's proposal for a single station serving Wood Green, extension to New Southgate, and subsequently, Growth Commissions recommendation that spur be delayed.

		Confirmation of population projections and sites informing infrastructure provision across the Lee Valley OAPF area, in recognition of refresh.
Office of Rail Regulation	Letters inviting representations on all Development Plan Documents and responses received. (See Consultation Statements for each DPD)	Details of representations received are provided in the Consultation Statement. No major issues raised.

4. Who Responded and Number of Representations Received

4.1 There were 54 representations received to the Development Management Policies DPD Pre-submission document. These came from developers, landowners and agents (18), local residents and individuals (18), local amenity and interest groups (8), public bodies (9) and one representation from a local councillor. **Appendix H** provides a full list of the respondents. In total, 178 individual comments were made that were considered and responded to by the Council. These are provided by Respondent order at **Appendix I** and by Document/Policy order at **Appendix J**.

5. Summary of the main issues/comments raised to the to the Development Management Policies DPD Pre-Submission consultation

5.1 Regulation 22(1)(c)(v) requires a summary of the main issues raised in representations made to the Development Management Policies DPD Pre-submission document. Pursuant to this requirement, the following section summarises the main issues raised through Pre-Submission consultation on the Development **Management Policies DPD and outlines the Council's proposed response to these**, including minor modifications.

General

5.2 Officers of the Greater London Authority (GLA) advised that the Mayor of London is content that the policies of the Development Management Policies DPD are in general conformity with the London Plan (2015). A number of specific representations were made by the GLA on matters of clarity and detail and these have been considered and wherever possible addressed as proposed minor modifications, **noting that the GLA's representation was received after the publication closing date** and is therefore included as a late representation.

Policy DM1 Delivering High Quality Design (Haringey Development Charter)

5.3 Respondents raised soundness concerns with Policy DM1D(b) and, therein, the removal of specified separation distances between habitable room windows that were included in the preferred option draft policy on privacy and amenity. In particular, they consider the

removal of the specified separation distances makes the policy vague and open to liberal interpretation by both developers and planning officers. They would like to see the policy give certainty by re-**instatement of the prescriptive separation distances**. **Council's view** remains that specified separation distances are a useful yardstick for visual privacy, but adhering rigidly to these measure can limit good urban design outcomes and can sometimes unnecessarily restrict density. A more appropriate approach is to require developers to demonstrate how the design of their proposed scheme provides for adequate visual and acoustic privacy for every home, including neighbouring dwellings, acknowledging that there are a variety of measures that could be used, beyond just separation distances, to achieve this.

- 5.4 A further addition sought was for the policy to specify building heights on backlands site, to ensure that future developments do not compromise the privacy and amenity of neighbouring properties. The Council does not consider it necessary to include this additional criterion as the matter is adequately dealt with through Policies DM1, DM 6 and DM 7 in combination.
- 5.5 It was queried whether policy DM1 takes precedence over policies relating to conservation areas. In response, the Council stated that Policy DM 1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character, including historic character and the setting of heritage assets.
- 5.6 The North London Waste Authority sought to ensure design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development. The Council response was that it considers the policy is sufficiently flexible to consider proposals having regard to individual site circumstances and the nature of development.

Policy DM2 Accessible and Safe Environments

5.7 No comments received

Policy DM3 Public Realm

- 5.8 A respondent objected to Criterion B which requires the management of the new privately owned public spaces, including their use and **public access, to be agreed by Council**. **They considered this to be beyond the role of planning policy**. **Council's view however**, is that in requiring the provision of new privately owned public space within new development, the Council has an obligation to ensure such space is maintained over the long-term, in terms of use, access and quality. This can only be ensured through agreement to the proposed management of these spaces.
- 5.9 Another respondent considered that the policy should be reworded to acknowledge that the provision, management and maintenance of public art and public access to spaces should be considered in the context of development viability and balanced against other priorities such as key infrastructure. The Council considers that the policy appropriately seeks to ensure consideration is given to the management and maintenance of public art and privately owned public spaces within developments, and that this is unlike to involve a development cost, as such costs would typically fall to occupiers of the development through, for example, the body corporation fees or rents.

Policy DM4 Provision and Design of Waste Management Facilities

5.10 No comments received

Policy DM5 Locally Significant Views and Vistas

- 5.11 A number of respondents queried how proposals would be able to ‘meet the requirements of’ the Council’s Tall Buildings and Views SPD if this doesn’t yet exist. Council agreed a proposed a minor modification ‘to have regard’ to the SPD, ensuring the policy remained effective.
- 5.12 It was also considered that the criteria under parts A (a-c) of the Policy were too onerous and thus not effective when considered against other development plan policies, namely those promoting intensification. The Council disagreed and considers that, while provision is made for more intensive development within Growth Area, development proposals within Growth Areas should still take account of protected views. The Council does not considered there to be a policy conflict.
- 5.13 It was pointed out that the numbers referencing the views on Figure 2.1 did not completely correspond with the views numbered and listed in Appendix A. **A minor modification is therefore proposed to correct this. It was also noted the Council’s intention to provide an additional map within the Tall Buildings and Views SPD to better show the relationship between the significant local views and tall building locations.**

Policy DM6 Building Heights

- 5.14 Respondents considered that the policy should be amended so that building heights are not applied rigidly to each site within each area. **The Council’s response was that the policy does not prescribe building heights, but rather sets out a positive framework for managing the development of tall and taller buildings in order to deliver the Borough’s spatial strategy, and is sufficiently flexible to consider proposals having regard to individual site circumstances.**
- 5.15 There was objection to Criterion B which requires proposals for taller buildings that project above the prevailing height of the surrounding area to **be justified in ‘community benefit’**. The Council maintains that taller buildings can be prominent and visual features which affect everyone. While good design will ensure these buildings are visually attractive, this is a requirement of all development and, therefore, further mitigation is required to justify the need for a taller. Likewise the promotion of more intensive development, to meet housing need in particular, was not in itself justification for a tall or taller building.
- 5.16 As with Policy DM5, a number of respondents queried how proposals would be able to ‘meet the requirements of’ the Council’s Tall Buildings and Views SPD if this doesn’t yet exist. Council agreed a proposed a minor modification ‘to have regard’ to the SPD, ensuring the policy remained effective.

- 5.17 The response from Workspace supported the detail of the draft policy in respect of **tall buildings being ‘a wayfinder or marker’ (C.a.i)** but considered that it would be appropriate to also add public spaces/ urban squares in to the wording. The Council disagrees. Its view is that **tall buildings often necessarily need to ‘land’ within a generous public spaces or urban square to provide a more human scale at ground level** and to reduce the feeling of dominance and enclosure. The provision of such mitigation can therefore not be considered to justify the tall building, noting also that such spaces would also not be considered to be of the magnitude expected of a location of civic importance in their own right.
- 5.18 It was also highlighted that Figure 2.2 was inaccurate and did not reflect **the most up to date evidence contained in the ‘Potential Tall Buildings Locations Validations Study’ (Nov 2015)**. A minor modification is therefore proposed to amend the map at Figure 2.2 to show two additional locations – the southern end of Finsbury Park and the site on the corner of Seven Sisters Road and Tottenham High Road – as potentially suitable for tall buildings, as identified in the supporting evidence base.
- 5.19 One response queried the use of the term ‘canyon effect’ **which they considered** vague and its application potentially subjective. **Council’s view is that the ‘canyon effect’ is a commonly understand and used widely term to describe the impacts of proximate** tall buildings on various local conditions to be experienced at ground level, in particular, wind conditions.

Policy DM7 Development on Infill, Backland and Garden Land Sites

- 5.20 The responses to the Policy raised concerns about the height of infill and backland development, and sought amendments to include a requirement that new buildings on backlands and infill sites should be no taller than surrounding adjacent properties, or even subordinate to surrounding properties. It was also requested that the Policy include separation distances to maintain the privacy and amenity of neighbouring properties. The Council considers that proposals on backland and infill sites will have to satisfy the requirements of Policy DM 1, as well as Policy DM7, which includes criteria requiring development to relate appropriately and sensitively to its surrounding context, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area.

Policy DM8 Shopfronts, Signs and On-Street Dining

- 5.21 The Policy received general support from the advertisement sector, with the exception of two minor points illuminated fascia signs and brightly illuminated shop fascias. Very minor alterations were suggested to provide clarity to the interpretation of the type of acceptable illuminated signage, which were acceptable to the Council and advanced as minor modifications.

Policy DM9 Management of the Historic Environment

- 5.22 Respondents queried how Policy DM9 related to Policy DM1 and whether one took precedence. The Council did not consider there to be any conflict between the two policies, with Policy DM1 being considered alongside other policies, which seek to ensure that

proposals positively respond to local character. **In the case of historic environments this includes an area's historic character, the significance of the historic assets affected, their setting, and architectural features in accordance with Policy DM9.**

- 5.23 A number of respondents also noted that the policy had been redrafted following comments from Historic England at Regulation 18 Preferred Option stage, and asked that the Inspector note this. Council confirmed that this was the intended outcome of publishing early drafts of the policies at Regulation 18 stage.
- 5.24 Helpfully, many of the responses sought minor changes to add clarity to the Policy, the vast majority of which were accepted by the Council and are put forward as minor modifications.
- 5.25 The representation of the Highgate Society sought to have a statement added to the Policy to the effect that Tall buildings are considered inappropriate within Conservation Areas. However, the Council considered that this was an unjustified statement, as there **are already a number of tall buildings within Haringey's Conservation Areas including civic building, churches and often larger corner plots.** The Council is of the view that Policy DM6C appropriately establishes the potential locations for tall buildings.

Policy DM10 Housing Supply

- 5.26 The respondent queried whether Criterion A of the Policy would be effective unless the Site Allocations document specifically allocates mixed use development sites, namely the Sites SA18 and SA21, to include residential use. **Council's response** was that the Site Allocations DPD does allocate sites for residential or mix-use development, as shown in the table for each allocation under the indicative development capacity. Policy DM10A is therefore considered by the Council to be consistent with the Site Allocations DPD.

Policy DM11 Housing Mix

- 5.27 One respondent sought a change to the Policy to promote a social mix of housing rather than just a mix of housing size and occupancy. The Council considers that provision for social mix is provided for through policies DM13, DM14, DM15 & DM17, noting that Policy **DM12D also requires mixed tenure schemes to be designed to be 'tenure blind'**.
- 5.28 A number of respondents to the Policy highlighted concerns with setting a firm affordable housing target, which they considered would not allow the Council to take advantage of fluctuations in the economy and land values. They go on to suggest Haringey adopt a pan-London format for viability appraisals. Council responded that Policy DM13 seeks the maximum reasonable amount of affordable **housing on sites with capacity for 10 or more dwellings, and that Haringey's current format for viability appraisals is set out in the Planning Obligations SPD but confirmed that if a London-wide format is produced, the Planning Obligations SPD will be updated to reflect this.**
- 5.29 The remainder of the responses came from the development industry sector, which queried whether the Haringey Urban Character Study was useful only as an indicative baseline guide to development, and whether housing mix should be market/demand led, and one

comment also objecting to Part C of the Policy which resists an overconcentration of 1 & 2 bedroom units. The Council responded that the policy sought as a whole to provide a balanced mix of housing across neighbourhood areas, with new development meeting current deficiencies in housing mix or identified housing needs. In this context the UCS helps understanding the wider surrounding built and housing context within which local housing needs and balanced and sustainable communities need to be delivered.

Policy DM12 Housing Design and Quality

5.30 Clarification was sought on when full width extensions and why the South Tottenham House Extensions SPD applies to the South Tottenham area only and not to the rest of the Borough. Council responded that it was not appropriate to provide the guidance suggested as an acceptable full width extension is considered to be an exception and would need to be justified on a case-by-case site by site basis. The South Tottenham House Extensions SPD responded to local circumstances.

Policy DM13 Affordable Housing

5.31 There was objection to the use of existing use land value as the acceptable standard residual valuation approach. Council confirmed that this approach is well established, accepted through the planning appeal process and is considered to be easily definable based on the current planning land use designation.

5.32 It was also suggested that Part B of the Policy, in particular, applying the affordable housing requirement to additional residential units that are created through amended applications, would be contrary to the policy purpose for small developers. Council clarified that the Policy sought to ensure that, when applicants come back to modify consented development, if the revised scheme includes additional units then the amount of affordable housing should also be revisited based on the new total housing figure for the development scheme.

Policy DM14 Self Build and Custom Build Housing

5.33 No comments received

Policy DM15 Specialist Housing

5.34 A representation sought the support for home adaptation to be specifically promised in the Policy. Others were concerned that it should be a priority of the Plan to provide more homes suitable for older people, to rent or to buy. In reply, the Council noted that home adaptations do not normally require planning permission, and that paragraph 3.29 clarified that provision of older persons housing will have regard to the benchmark in the London Plan..

5.35 There was an objection to sub-criterion f) where it was considered onerous to require the provision an element of affordable student accommodation where occupation could not be secured by members of a specified educational institution. It was suggested that this requirement would need to have regard to viability. Council set out that the affordable housing policy, if triggered, includes viability considerations.

Policy DM16 Residential Conversions

5.36 It was suggested that more advice and guidance should be given to residents to conserve gardens; in particular the use of paving with absorption properties. The Council clarified that Policy DM7 sets out a presumption against the loss of garden land, and policies to promote sustainable drainage were set out at Policies DM25 & DM26. It was also noted that the Council may give consideration to the preparation of further guidance to assist with implementation of the Local Plan policies.

Policy DM17 Houses in Multiple Occupation

5.37 No comments received

Policy DM18 Residential Basement Development and Light Wells

5.38 Concern was raised that the Policy was not as robust as policies adopted by other Councils in London, namely Westminster Council and **Camden Council**. **The Council's response was that local policies must be based on local evidence, and in a Haringey context**, the policy is sufficiently robust and proportionate to positively manage basement developments. A minor modification was however promoted that inserted a cross reference to the Development Management Policy DM24 on managing flood risk, given this was seen as a significant area of concern to local residents.

Policy DM19 Nature Conservation

5.39 The Environment Agency noted that they had new revised climate change allowances and that they expected applicants to factor these into their Flood Risk Assessments rather than the previous 20% for peak river flow. The Council therefore agreed to include a reference to the revised allowances through a minor modification as suggested by the EA.

Policy DM20 Open Space and Green Grid

5.40 **An amended to the Policy's supporting text was sought to state that the proposed Green Grid is a pedestrian and cycle link opportunity.** This was considered incorrect by the Council, noting that the purpose of the Green Grid is already clearly set out at paragraph 4.16. A further response sought to ensure that Part F of the Policy would **only apply to development proposals that comprise existing 'green space', and should respond to the visual character of that open land.** Council again disagreed, as development adjacent to green spaces can impact on the use, enjoyment, and visual character of the open space, and is therefore appropriately considered through detailed planning applications. These are important public spaces that are to provide relief from the surrounding urban built up environment. Sport England responded to confirm their support for the policies.

Policy DM21 Sustainable Design, Layout and Construction

5.41 Comments were received concern references to climate change, which the Council considers are addressed through minor modifications elsewhere within the Local Plan, or through existing policy within the London Plan.

Policy DM22 Decentralised Energy

5.42 Respondents on behalf of the development industry considered that it was unreasonable for the Policy to require development proposals to optimise opportunities for extending the communal energy system, irrespective of viability and feasibility. The Council however, considered that the Policy conforms to the London Plan and is sufficiently flexible to enable development proposals to come forward, having regard to individual site circumstances, including certainty of delivery of any planned future DE network. However to ensure consistency with the London Plan a minor modification was included to **replace 'optimise' with 'examine' opportunities to extend** the DE network.

Policy DM23 Environmental Protection

5.43 Two statutory bodies commented to raise awareness of new guidance and to update the text supporting policy DM23 to reflect this, which the Council agree is appropriate.

Policy DM24 Managing and Reducing Flood Risk

5.44 Concern was raised that flood risk arising from breach of Reservoirs was not adequately covered with respect to bedrooms not being located in basements. However, Policy DM18 (B) is clear that habitable rooms will not be permitted in basements in areas prone to flooding.

Policy DM25 Sustainable Drainage Systems

5.45 Comments received from the EA, seeking reference to new allowances, and by the GLA regarding the need to link this policy better with DM24.

Policy DM26 Critical Drainage Areas

5.46 The representation from Sport England supported the policy while the only other representation was from the GLA regarding the need to link this policy better with DM24 and DM25.

Policy DM27 Protecting and Improving Groundwater Quality and Quantity

5.47 Comment was received from the EA, seeking reference to new allowances

Policy DM28 Watercourses and Flood Defences

5.48 Comment was received from the EA, seeking reference to new allowances

Policy DM29 On-Site Management of Waste Water and Water Supply

5.49 No comments received

Policy DM30 New Waste Facilities

5.50 The representation of the North London Waste Authority considered that the reference to 'achieving levels' was unclear in terms of what levels of environmental compliance was being referred to. They suggested amendments to provide clarity, which the Council considered helpful and has put forward as minor modifications.

Policy DM31 Sustainable Transport

5.51 No comments received

Policy DM32 Parking

5.52 No comments received

Policy DM33 Crossovers, Vehicular Access and Adopting Roads

5.53 The representations received to the Policy were generally supportive, with respondents suggesting further amendments to strengthen the policies to deal with the effects of car parking in front gardens in Conservation Areas, and to ensure the criteria in Part A are exclusive of each other. However, none of the amendments were considered by the Council to be necessary when considered in the context of the relevant policies of the Plan as a whole.

Policy DM34 Driveways and Front Gardens

5.54 As with DM33, the representations to the Policy were generally supportive. The suggested amendments regarding drainage provision, permeable landscaping, and proposals within Conservation Areas requiring demolition of a boundary wall, was either considered to already be adequately provided for in the Policy or through Policy DM9: Management of the Historic Environment.

Policy DM35 Cycle Storage in Front Gardens

5.55 The representations received to the Policy were supportive with no changes sought

Policy DM36 Mini Cab Offices

5.56 No comments received

Policy DM37 Maximising the Use of Employment Land and Floorspace

5.57 No comments received

Policy DM38 Employment-Led Regeneration

5.58 Respondents queried the provision for affordable rents, the need to provide the maximum amount of employment floorspace that can be achieved; the need to enable connection to ultra-fast broad band; and the need to investigate an RA site's potential to meeting the Boroughs identified gypsy and traveller accommodation needs. The Council considers the Local Plan is clear on the need to protect employment land to meet objectively assessed need and the Borough's strategic employment target. In line with the NPPF, the Local Plan provides flexibility to respond to market signals, and DM 38 therefore makes allowance for employment enabling mixed use schemes on RA and non-designated sites where viability for employment floorspace provision alone is an issue. The Council is seeking that proposals justify there is demonstrable need for non-commercial uses to cross subsidise and enable employment development, and that this is the maximum that can be achieved on the site through the scheme proposed – it is not requiring developers to justify the principles of mixed use within LEA-RA, as this has been established through the Local Plan policies. DM38 also recognises that RA sites offer flexibility for land uses, and therefore, as part of the mix of uses, opportunities for sites to meet identified need for gypsy and traveller accommodation, where suitable, should be investigated.

Policy DM39 Warehouse Living

5.59 The representation accepts an element of employment floorspace re-provision within the Warehouse Living district, but considers that the wording of the policy is too restrictive. Council remains of the view that the Policy is appropriate and the requirement to prepare a masterplan enables consideration of the employment floorspace to be re-provide having regard to type, quality, existing user needs, and the inter-relationship with the living accommodation to be provided.

Policy DM40 Loss of Employment Land and Floorspace

5.60 Responses to Policy DM 40 ranged from those wanting same area of floorspace to be provided in any proposed redevelopment, to those who consider the policy is inconsistent with the NPPF by continuing to protect non-designated employment land sites for employment use. While the Council considers that the equivalent replacement approach may be too onerous, the NPPF is clear that “where there is no reasonable prospect of a site being used for the current or allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities”. Council's argument here is that we have sufficient sites to meet Haringey's strategic housing requirement over the Plan period but are likely to require other non-residential land to provide the alternative jobs, infrastructure and social facilities needed to support the planned growth. Being truly surplus to their existing employment use means that these sites should be of lower existing use value and therefore more deliverable for alternative Non-residential uses.

Policy DM41 New Town Centre Development

5.61 Only one response received which suggested the policy objective is changed to consider the important supporting role housing can play in sustaining vibrant and vital town centres. The Council however, considers that Policy SP 11 adequately sets out the Council's strategic approach to town centre development, and paragraph 5.3.19 is clear that housing can play a role in supporting town centre vitality. The DM45 addresses the role of housing and the intensification of uses within town centres, while this Policy, DM41 appropriately deals with main town centre uses as defined in the NPPF.

Policy DM42 Primary and Secondary Frontages

5.62 The responses received were in respect of betting shops, for which the respondents consider the policy is too restrictive. The Council **disagree and considers that the Policy is about maintaining and supporting the role and function of Haringey's higher order town centres and accords with national and regional policy.**

Policy DM43 Local Shopping Centres

5.63 As per Policy DM42, the responses received were in respect of betting shops, for which the respondents consider the policy is too restrictive. The Council disagree and considers that the Policy is about maintaining and supporting the role and function of **Haringey's** higher order town centres and accords with national and regional policy.

Policy DM44 Neighbourhood Parades and Other Non-Designated Frontages

5.64 Respondents queried whether the policy was included in the Preferred Option consultation documents. Council confirms the Policy was part C of DM53 in the Preferred Options version. The policy was amended in response to Reg 18 consultation comments and was separated to ensure clarity for policy implementation, and renamed in terms of the Town Centres hierarchy.

Policy DM45 Maximising the Use of Town Centre Land and Floorspace

5.65 A comment was received from Historic England which asked that the policy wording be amended such that it seeks to optimise land in town centres as oppose to maximise. Council has agreed and proposed a minor modification to this effect.

Policy DM46 Betting Shops

5.66 Representations received on behalf of the betting shop sector which considered that the Policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between shops. The Council considers that the policy approach is consistent with national and regional policy in addressing health and well-being.

Policy DM47 Hot Food Takeaways

5.67 Representations received on behalf of the takeaways industry which seeks the deletion of Policy DM47 Part (A) and the removal of the specific percentage threshold. The Council considers that the policy approach is consistent with national and regional policy in addressing health and well-being.

Policy DM48 Use of Planning Obligations

5.68 The representation received sought an amendment to the Policy to expressly reference the impact of obligations burden on **development viability. The Council's view is** that development is expected to meet the relevant policy requirements of the Local Plan, and therein, such obligations as necessary to make the development acceptable in planning terms. Without meeting the obligations the

proposed development is unlikely to be considered 'sustainable' and should be refused. Viability concerns should therefore be an exception, based on exceptional site circumstances, and where such is demonstrated, it remains for the planning authority to determine the balance of obligations to be secured, having regard to sustainability and site circumstances.

Policy DM49 Managing the Provision and Quality of Community Infrastructure

5.69 NHS PS responded to the Preferred Options DPD, and their comments were taken into account in the revised Policy which they stated in their representation is now considered to be consistent with paragraph 3.87A of the 2015 London Plan (FALP).

Policy DM50 Public Houses

5.70 Historic England commented that the policy should take into account the potential impacts upon the significance of the heritage asset. Council consider that heritage impacts are adequately provided for in Policy DM9 and need not be repeated.

Policy DM51 Provision of Day Nurseries and Child Care Facilities

5.71 A local resident raised concerns that this policy could likely lead to a shortage of childcare facilities as they consider commercial premises not appropriate for conversion to childcare use. Council does not agree as there are a wide range of non-residential premises that have already been converted successfully.

Policy DM52 Burial Space

5.72 Historic England commented that the policy should take into account the potential impacts upon the significance of the heritage asset. Council consider that heritage impacts are adequately provided for in Policy DM9 and need not be repeated.

Policy DM53 Hotels and Visitor Accommodation

5.73 No comments received

Policy DM54 Facilitating Telecommunications Development

5.74 No comments received

Policy DM55 Regeneration and Masterplanning

5.75 The representation on behalf of Workspace argued that while masterplans are useful tools, they should not be approved as part of a **development but used as background information in the Council's decision-making process**. The Council considers the requirement for site masterplanning provides certainty that individual site development proposals will not prejudice each other or the wider development aspirations of the Borough. The Council considers this policy is necessary to ensure delivery of the spatial strategy, and is therefore effective in line with national policy. The Council expects planning applications to come forward in line with the agreed wider

masterplan. Parkstock Ltd sought comfort on reasonable endeavours with respect to engagement with other landowners. Such a caveat was considered unnecessary, given that any subsequent planning application would be subject to notification to all affected parties.

Policy DM56 Supporting Site Assembly

5.76 This Policy was supported by the only respondent to comment - Workspace

Appendix A Schedule of Locally Significant Views

5.77 Comments made to Appendix A followed those made to Policy DM5 - that the numbering in the Appendix and the views shown on Figure 2.1 do not correspond. The Council acknowledges this error and proposes minor modifications to correct it.

Appendix B Article 4 Directions for Historic Environment

5.78 No comments received

Appendix C Town Centre Primary and Secondary Frontages

5.79 No comments received

Appendix D Saved Unitary Development Plan (UDP) Policy Replacement

5.80 No comments received

Appendix E Supplementary Planning Document and Guidance Replacement

5.81 No comments received

Appendix F Glossary of Terms

5.82 No comments received

Appendix A – Notice placed in the local newspaper on both the 8th and 15th January 2016

thetottenhamindependent.co.uk

TO ADVERTISE: 01923 216232
Email: classifiedads@london.newsquest.co.uk

HARINGEY LOCAL PLAN PUBLIC NOTICE
Planning and Compulsory Purchase Act 2004

The Town and Country Planning (Local Planning) (England) Regulations 2012
Publication of a Local Plan (Regulation 19) Haringey's Local Plan documents:
Alterations to Strategic Policies; Development Management DPD
(Pre-submission); Site Allocations DPD (Pre-submission); and
Tottenham Area Action Plan (Pre-submission)

Haringey Council has prepared the proposed submission versions of the above Development Plan Documents (DPDs), which form Haringey's Local Plan to guide planning and development in the borough up to 2026 and beyond. The Strategic Policies (adopted 2013) is subject to a partial review to take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies. The Development Management DPD contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. The Site Allocations DPD identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified needs for housing, jobs, and the delivery of required infrastructure. The Tottenham Area Action Plan sets out relevant policies, proposals and site allocations for future development within the Tottenham area. The DPDs are accompanied by a Sustainability Appraisal, Habitats Assessment and an Equalities Impact Assessment.

Inspection of documents
The Council is inviting representations on the above DPDs and the accompanying documents. They are available for inspection from **Friday 8th January to Friday 4th March 2016**:

- at all Haringey libraries (during normal opening hours);
- at the Civic Centre, Wood Green N22 8LE;
- at the Planning Service, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ; and
- on line at www.haringey.gov.uk/localplan

Representation procedure
The DPDs are being published in order for representations to be made prior to the documents being submitted to the Secretary of State for examination in public. Representations received during this pre-submission consultation will be considered alongside the submitted DPDs by an independent Planning Inspector. The purpose of the examination is to consider whether the DPDs comply with legal requirements and are 'sound' against the test of soundness prescribed by the Government in the National Planning Policy Framework (2012). To be 'sound' the DPDs must be positively prepared, justified, effective and consistent with national planning policy and in general conformity with the London Plan (2015). Representations may be accompanied by a request to be notified at a specific address about the submission of the DPDs to the Secretary of State for examination in public. All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by 5pm on **Friday 4th March 2016**. Representations may be made by any of the following means:

- the online response form at www.haringey.gov.uk/localplan
- by email at ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further information
For enquiries, email ldf@haringey.gov.uk or contact the Planning Policy Team on 020 8488 1478 or at the above address.
Dated 6th January 2016

January 15, 2016 25

TO ADVERTISE: 01923 216232
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All comments must be made on a 'representation' form which is available at the above venues and on the Council's website. Representations must be received by **5pm on Friday 4th March 2016**. Representations may be made by any of the following means:

- the online response form at <http://haringey.gov.uk/localplan>
- by email at: ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Further information

For enquiries, email ldf@haringey.gov.uk or contact the Planning Policy Team on 020 8489 1479 or at the above address.
Dated 6th January 2016

Appendix B – Notification Letter sent to all Consultees on the Council’s LDF Consultation Database

Date: 6th January 2016

Contact: Planning Policy Team

Direct dial: 020 8489 1479

Email: ldf@haringey.gov.uk

Dear Sir/Madam,

Haringey Local Plan Pre-Submission Public Consultation 8th January2015- 4th March2016

Haringey Council is now consulting on the final drafts of four **Development Plan Documents (DPD)**, which make up Haringey’s Local Plan. These include:

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

These documents have been prepared in response to the previous consultation in February/March 2015; and earlier consultations on the Development Management Policies in 2013; and the Site Allocations and Tottenham Area Action Plan in 2014. We are now seeking your views on the final drafts of the above plans.

The Strategic Policies (adopted 2013) set out the Council’s **spatial strategy for how Haringey will develop and grow over the period to 2026**. The partial review of the policies take account of new growth requirements for the borough as set out in the London Plan as well as the findings of updated evidence base studies.

The Development Management Policies contains the general planning policies for the borough that will be used to assess and determine planning applications for new development. Once adopted, the policies will replace those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations identifies sufficient development sites, outside of the Tottenham AAP area, to meet the identified growth needs/targets set out in the Strategic Policies DPD, including those for housing, jobs, and the delivery of required infrastructure. It also establishes specific site requirements against which planning applications will be considered.

The Tottenham Area Action Plan sets out policies, proposals and site allocations for future development within the Tottenham area, based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

A Local Plan Policies Map has also been produced to graphically represent the planning designations and policies contained in the four DPDs.

Following this consultation, the documents along with the consultation responses will be submitted to the Secretary of State for independent examination.

Please find enclosed a Statement of Representations Procedure, which provides details of how you can provide your comments on the documents, all of which are available to view at www.haringey.gov.uk/local-plan ; and in hard copies at all public libraries, Planning Service offices, 6th Floor, River Park House, 225 High Road Wood Green, N22 8HQ, and the Civic Centre, Wood Green N22 8LE.

Please provide us with your comments via:

- The online response form at <http://haringey.gov.uk/localplan>
- by email at: ldf@haringey.gov.uk; or
- by post to: Local Plan Consultation, Planning Policy, Haringey Council, River Park House, 225 High Road, Wood Green, London N22 8HQ

Comments must be received by 5pm on Friday 4th March 2016.

Comments may be made in support of the policy documents, as well as in objection. However, at this stage of the Local Plan's production it is required that your comments focus on the legal compliance and soundness of the documents. Details of what constitutes legal compliance and soundness can be found in the Statement of Representation Procedures attached. In addition, the Sustainability Appraisal and supporting evidence base are available to view and download from the Council's website: www.haringey.gov.uk/localplan.

Next Stages

Following the end of the consultation period, copies of all responses received will be sent to the Planning Inspectorate for consideration alongside the documents, together with a summary of the key issues, including the Council's responses to the points raised.

The Council anticipates that the Examination in Public will take place in summer 2016. We will regularly update our website www.haringey.gov.uk/localplan with information about this. If you would like to find out more about the Local Plan you can call the Planning Policy team on 020 8489 1479 or email us at ldf@haringey.gov.uk.

Yours faithfully,

Stephen Kelly

Stephen Kelly, Assistant Director, Planning

Appendix C – List of contacts on the Council’s LDF Consultation Database

Lynne Zilkha	Elizabeth Sutton-Klein	Cllr Mallett Antonia	Cllr Christophides Joanna	Cllr Adamou Gina
Jasper Woodcock	Henriette Stuchtey	Cllr Mann Jennifer	Cllr Connor Pippa	Cllr Adje Charles
Heather Wood	Celeste Menich	Cllr Marshall Denise	Cllr Demirci Ali	Cllr Ahmet Peray
Kitty Wong	Margaret Stoves	Cllr McNamara Stuart	Cllr Diakides Isidoros	Cllr Akwasi-Ayisi Eugene
John Wise	Kevin Stanfield	Cllr McShane Liz	Cllr Doron Natan	Cllr Amin Kaushika
Teresa Wing	Michael Edwards	Cllr Meehan George	Cllr Ejiofor Joseph	Cllr Arthur Jason
Carolyn Whitehead	Evelyn Ryan	Cllr Morris Liz	Cllr Elliott Sarah	Cllr Basu Dhiren
Edward Webb	Tara Ryan	Cllr Morton Peter	Cllr Engert Gail	Cllr Beacham David
Julia Warburton	Nicholas Rusz	Cllr Newton Martin	Cllr Gallagher Tim	Cllr Berryman Patrick
Jonathan Vellapah	Joyce Rosser	Cllr Opoku Felicia	Cllr Goldberg Joe	Cllr Bevan John
Nick Triviais	Jeff Rollings	Cllr Ozbek Ali Gul	Cllr Griffith Eddie	Cllr Blake Barbara
Max Tomlinson	Chris Roberts	Cllr Patterson James	Cllr Gunes Makbule	Cllr Blake Mark
Joey Toller	Lorna Reith	Cllr Peacock Sheila	Cllr Hare Bob	Cllr Bull Clare
Jane Thompson	Barry Rawlings	Cllr Reith Lorna	Cllr Hearn Kirsten	Cllr Bull Gideon
Rachel Tedesco	Kimberley Pyper	Cllr Rice Reg	Cllr Ibrahim Emine	Cllr Carroll Vincent
Alison Taylor-Smith	Annabruna Poli	Cllr Ross Viv	Cllr Jogee Adam	Cllr Carter Clive
Simon Miller	Karl-Dirk Plutz	Cllr Ryan James	Cllr Kober Claire	Cllr Sahota Raj
Richard Perry	Chris McNamara	Gabrielle Kagan	Alexander Elliot Ltd	Cllr Stennett Anne
Andrew Papadopoulos	Louise McNamara	Petal Caddu	Alexandra Mansions Tenants Association	Cllr Strickland Alan
Pavel Pachovský	Peter McNamara	Francois Joubert	Adult Literature Group	Cllr Vanier Bernice
Christopher Owen	Richard Max	Nick Jenkins	African Caribbean Association	Cllr Waters Ann
Stephen Overell	Kim Mason	Tony Hopkins	African Cultural Voluntary Organisation	Cllr Weston Elin
Gerrit Ormel	Colin Marr	Marian Hone	African Women's Welfare Group	David Lammy MP
Christian Ogilvie-Browne	Jason MacKay	Elaine & Ben Holgado	Africans & Descendants Counselling Services Ltd	Lynne Featherstone MP
Juliet Oerton	Stephen Lubell	Susie Holden	Age UK	A Anva Ltd

Carol Norton	John Long	Michael Herbert	Agudas Israel	A P T Consulting
Joseph Nicholas	Alison Lister	Frances Heigham	AH Architects	A S Z Partners Ltd
Ollie. Natelson	Barry and Louise Lewis	Claudia Hawkins	Air Transport Users Council	A. E. Butler & Partners
Jill Naeem	Rebecca Lellis Ferreira	Lauritz Hansen-Bay	Aitch Group	A.C.H. Turkish Speaking Pensioners Club
Eleni Murphy	Ethan Lazell	Paul Hancock	AJ Architects	Abbeyfield (North London) Society
Dave Morris	Charlie Kronick	Laura and Marcus Graham	Alan Cox Associates	Abbeyfield Society
Said Moridi	Heather Kinnersley	Marcos Godinho	Albany & Culross Close Residents Association	ACHE (Action for Crouch End & Hornsey Environment)
Faye Morgan	Angie Kikkides	Joe Friedman	Avenue Mews Tenants Association	Alexandra Palace Action Group
Mary Mitchell	Hannah French	Tinu Cornish	Aztech Architecture Ltd	Alexandra Palace Residents Association
Elaine Graham	Paul Brown	Lucia Brusati	Bahai Community	
Sean Fewlass	Stephen Brice	Tim Brierley	Bangladesh Muslim Organisation	Alexandra Park/Grove Lodge Meadow Allotments
Carla Ferrarello	Jill Bowden	Arthur Leigh	Bangladeshi Cultural Society	Alexandra Primary School
Pasco Fearon	Tim Blake	Beatrice Hyams	Bangladeshi Women's Association	Alexandra Residents Association
Cindy Evans	Anna Blackburn	Valerie Rose Berry	Baptist Church	Alexandra Tenants Association Group
Sue Ettinger	Matthias Bauss	Bill Temple-Pediani	Barnet, Enfield and Haringey Health Authority	Allenson House Medical Centre
Chris Elser	Frances Basham	Laura Forrest-Hay	Bashkal & Associates	Ally Pally Allotment Society
Kieron Edwards	Miles Attenborough	Sarah Lane	Bedford Road Tenants Association	Al-Rasheed Dauda Architect
Johnny Dixon	James Athanassiou	Elizabeth Gray	Belcher Hall Associates	Altaras Architecture

Angharad Davies	Ruth Antoniadis	Nicola Venning	Bell Residents Association	Anatolitis Associates
Felipe Da Rocha	Paulette Amadi	Panos Nicolaidis	Belmont Infant & Junior School	Ancient Monuments Society
Ruth Cowan	Linda Alliston	Poppy Rose	Bethel United Church of Jesus Christ	Andrew Kellock Architects
Stephen Cook	Andreas Adamides	Christopher Chadwick	Bhagwati Sai Culture & Social Centre	Andrew Mulroy Architects Ltd
Kenneth Connelly	Leila Sifri	Barry James	Bibles Christian's Assembly	Anglo Asian Women's Association
Anastasia Christofis	Eliza Kaczynska-Nay	Bob Maltz	Bicknell Associates Chartered Architects	Apcar Smith Planning
David Burrowes MP	Cynthia Jenkins	Flavio Poli	ASRA (GLHA)	Arbours Association
Paul Bumstead	Robert Franks	Selina & Dan Egerton	Aspire Design & Survey Ltd	Architectural Heritage Fund
Reuben Payne	Elizabeth Barnett	Broadwater Farm Community Health Centre	Blitzgold Ltd	Architectyourhome-Highgate
Hannah Redler Hawes	Angela Rossi Carter	Broadwater Farm Residents Association	Born Again Evangelistic	Archi-Tone Ltd
John Murray	Tony Baker	Broadwater Residents Association	Bostall Architecture Services	Archway Road Residents Association
Christine King	Gordon Forbes	Brown & Co (Surveyors) Ltd	Bounds Green & District Residents Association	Archway Road Tenants Association
Jon Brooks	Huub Nieuwstadt	Bruce Castle Village Residents Association	Bounds Green Group Practice	Archway Road Tenants Association
Chris Warburton	Bill Nottage	Brunswick Park Health Centre	Bounds Green Health Centre	ARHAG Housing Association
David Lichtenstein	Frederick Limbaya	Buckingham Lodge Residents Association	Bounds Green Infant & Junior School	Arnold Road Residents Association
Nick Oparvar	Feolezico Calboli	Building Design Consultants	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Arnos Grove Medical Centre
Ruth Ortiz	Sue Penny	CA (UK) Ltd	Bowes Park Community Association	Arta Architectural
Ursula Riniker	J N Douglas	CAAC Highgate	Bowes Park Community	Ashdown Court Residents

			Association	Association
David Baker	David Rennie	CABE	Bracknell Close/Winkfield Road Residents Association	Asian Carers Support Group
Michele Eastmond	Steve Roe	Campbell Court Residents Association	Brendan Woods Architects	Asian Community Centre
Chris Mayled	Katy Andrews	Campsbourne Baptist Church	Bridge House Health Care Centre	Asian Community Group
Jeremy Munday	Sophie Cattell	Campsbourne Centre	Briffa Phillips Architects	Asian Family Group
Nicholas Embling	Capital Architecture Ltd	Campsbourne Infant School	Britannia Hindu Temple Trust	Broadwater Farm Community Centre
Andrew Tiffney	Calvary Church of God in Christ	Chestnut Area Residents Association (CARA)	Client Design Services Ltd	Crawford Partnership
Carolyn Squire	Carr Gomm Society	Chestnut Northside Residents Association	Clyde Area Residents Association	Crouch End open Space (CREOS)
Corporation of London	Carter Surveying Associates	Chestnuts Community Centre	Coldfall Community Centre	CRH Tenants Association
London Borough of Haringey	Caryatid Architects	Chinese Community Centre	Coldfall Primary School	Cromwell Avenue Residents Association
London Borough of Sutton Planning and Transportation	Casa de la Salud Hispano Americana CASAHA	Chomley & Causton Residents Association	Coleraine Park Primary School	Crouch End Dental Practice
London Borough of Redbridge	CASCH	Christ Apostolic Church Kingswell	Collage Arts	Crouch End Health Centre
London Borough of Brent Planning Services	Charlton House Medical Centre	Christ Church	Commerce Road Tenants Association	Crouch End Health Centre
London Borough of Barking & Dagenham	Cherry Tree House Residents	Christchurch West Green	Community Action Sport	Crouch End Traders Association
London Borough of Barnet Planning Department	CASE	Christopher Wickham Associates	Community Church of God	Crouch End URC Church
London Borough of Bexley	Causeway Irish	Church Commissioners	Community Gay & Lesbian Association	Crouch Hall Road Surgery
London Borough of	CB Architects	Church Crescent	Community Response	Crowland Primary School

Croydon		Residents Association	Unit	
London Borough of Enfield	Cemex (UK) Operation Ltd	Crammond Browne Architects	Community Safety Unit	Cube Building Consultancy
London Borough of Hammersmith and Fulham	Central & Cecil	Circle 33 Home Ownership Ltd	Confederation of British Industry	CUE
London Borough of Harrow	Centre for Accessible Environments	Circle 33 Housing Group	Co-op Homes	CUFOS Community Centre
London Borough of Hillingdon	Charisma Baptist Church	Clark Designs Ltd	Coppetts Residents Association	Cypriot Centre
London Borough of Hounslow	Albany & Culross Close Residents Association	Clarke Desai Ltd	Corporation of London	Cypriot Women's League
RB Kensington & Chelsea	Alexandra Mansions Tenants Association	Claudio Novello Architects	Council for British Archaeology	Cyprus Turkey Democratic Association
RB Kingston upon Thames	Alexandra Palace Action Group	Cherry Tree House Residents	Edgcott Grove Residents Association	D R M Associates
London Borough of Lambeth	Alexandra Palace Residents Association	Chestnut Area Residents Association (CARA)	Eldon Road Baptist Church	DASH
London Borough of Lewisham	Alexandra Park/Grove Lodge Meadow Allotments	Chestnut Northside Residents Association	EMJCC Community Side	David Langan Architects
London Borough of Merton	Alexandra Residents Association	Chomley & Causton Residents Association	ENKI Architectural Design	Dental Health Centre
London Borough of Newham	Alexandra Residents Association	Church Crescent Residents Association	Eritrean Community in Haringey	Dental Practice
London Borough of Richmond Upon Thames Policy and Design	Alexandra Tenants Association Group	Clyde Area Residents Association	Ermine House Residents Association	Dental Surgery
London Borough of Tower Hamlets Strategic Planning	Archway Road Residents Association	Commerce Road Tenants Association	Ermine Road Residents Association	Department for Culture Media and Sport
London Borough of Waltham Forest	Campbell Court Residents Association	Coppetts Residents Association	Evering Pentecostal Church	Ecodomus
Westminster City Council Planning and City	Archway Road Tenants Association	CRH Tenants Association	FA Drawing Service	Devonshire Hill Primary School

Development				
London Borough of Havering	Arnold Road Residents Association	Cromwell Avenue Residents Association	Faith Baptist Church	Direct Planning Ltd
London Borough of Wandsworth	Ashdown Court Residents Association	Eastbourne Ward Residents Association	Faith Mosque	Discount Plans Ltd
London Borough of Ealing	Avenue Mews Tenants Association	Edgcott Grove Residents Association	Faith Restoration Ministry	Downhills Infant & Junior School
London Borough of Hackney	Bedford Road Tenants Association	Ermine House Residents Association	Family Health Service Authority	DPA (London) Ltd
City of London	Bell Residents Association	Ermine Road Residents Association	Family/Landmark Housing Association	DPDS Consulting Group
London Borough of Camden	Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	Ferry Lane Estate Residents Association	Federation of African Peoples Organisation	Duckett Dental Surgery
Department for Transport	Bowes Park Community Association	Fortismere Residents Association	Ferry Lane Estate Residents Association	Earlsmead Primary School
Garden Residents Association	Bowes Park Community Association	Garden Residents Association	Finsbury Park Track & Gym	Eastbourne Ward Residents Association
Grosvenor Road Residents Association	Bracknell Close/Winkfield Road Residents Association	Muswell Colney Residents Association	Friends of Ivatt Way	Ebenezer Foundation Advisory Association
Hale Estate Residents Association	Broadwater Farm Residents Association	Nelson Mandela Residents Association	Friends of Lordship Rec	South Hornsey Residents Association
Harmony Close Residents Association	Broadwater Residents Association	Noel Park North Area Residents Association	Friends of Markfield Recreation Ground	Southwood Lane Residents Association
Hillcrest Tenants & Residents Association	Bruce Castle Village Residents Association	North Grove Residents Association	Friends of Muswell Hill Playing Fields	Springfield Avenue Residents Association
Hillside Road Residents Group	Buckingham Lodge Residents Association	Northumberland Park Tenants & Community Association	Friends of Muswell Hill Playing Fields & Coldfall Wood	Stokley Court Residents Association
Hilltop House Residents Association	Flower Michelin Ltd	Oakdale Resident Association / South Tottenham RA	Friends of Noel Park	Stroud Green Residents Association
Hornsey Lane/Colwick	Forestry Commission	Palace Gates Residents	Friends of Paignton Road	Suffolk Road Residents'

Close Residents Association	England	Association		Association
HTBG Residents Association	Fortismere Residents Association	Palace View Residents Association	Friends of Queen's Wood	Summersby Road Residents Association
Jackson's Lane Residents Association	Fortismere School	Park Lane Close Residents Association	Friends of Railway Fields	The Chine & Cascade Residents Association
James Place/Church Road Residents Association	FOW	Partridge Way Residents Association	Friends of Railway Fields	The Weymarks Residents Association
Kingsley Place Residents Association	Frederick Knight Sports Ground	Plevna Crescent Residents Association	Friends of Stationer's Park	Tiverton Tewkesbury Residents Association
Lancaster Road Residents Association	Freight Transport Association	Remington Road Residents Association	Friends of the Earth (London Region)	Tower Gardens Residents Network
Lomond Close & Brunswick Road RA	Friends of Albert Road Recreation Ground	Resident Association	Friends of Tottenham Cemetery	Turner Avenue Residents Association
Lomond Close Residents Association	Friends of Bowes Park Garden	Resident Association	Friends of Wood Green Common	Veryan Court Residents Association
Love Lane Residents Association	Friends of Bruce Castle	Robert Burns Residents Association	G T Project Management	Wood Green Black Tenants Group
Millicent Fawcett Tenants Association	Friends of Hornsey Church Tower	Seymour Road Residents Association	Gage Limited	Wood Green Central Area Tenants & Community Assoc.
Moselle Close Residents Association	Friends of Brunswick Road Open Space	Sophia House Residents Association	Garden Drive Neighbourhood Watch	Woodridings Court Residents Association
Friends of Chestnut Park	Friends of Cherry Tree Wood	Friends of Crouch End Open Space	Friends of Downhills Park	Woodside Residents Association
Garden Residents Association	Guyana People's Congress	West Green Residents' Association	Haringey Irish Cultural & Community Centre	The Queens Mansions Residents Association
Gf Planning Limited	Habinteg Housing Association	Woodlands Park Residents Association	Haringey Leaseholders Association	Avenue Gardens Residents Association
Gladesmore Community School	Haines Philip Architects	Woodstock Road Residents Association	Haringey Mencap	Beresford Road Residents Association
Gladesmore Girl's & Young Women's Club	Hale Estate Residents Association	Cranley Gardens Residents' Association	Haringey Pakistan Cultural Society	Burghley Road Residents Association

Gladesmore Youth Club	Hamilton Bishop Ltd.	Wood Lane Residents Association	Haringey Phoenix Group	Chestnuts Northsid Residents Assn
Globe Projects Ltd	Hancock Architects	Gardens Residents Association (GRA)	Haringey Police	Chitts Hill Residents Association
Goan Community Centre	Haringey African Organisation	Grovelands, Lemsford & Leabank Residents Assoc.	Haringey Solidarity Group	Glasslyn, Montenotte Tivoli Road Residents Assoc.
Grace Baptist Chapel	Haringey Area Youth Project	Torrington Park Residents Association	Haringey Sports Council	HFRA (Haringey Federation of Residents Association)
Greek Community Care	Haringey Arts Council	Tynemouth Area Residents' Association	Haringey United Church	Morrish Residents Association
Greek Orthodox Church	Haringey Asian Women Aid	Friern Village Residents' Association	Haringey Women's Aid	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park
Greek Parents Association	Haringey Autism	The Bounds Green and District Residents Association	Harmony Close Residents Association	Parkside & Malvern Residents Association
Green City Landscapes Ltd	Haringey Breastfeeding Centre	Dowset Road Residents Association.	HART Architecture	Parkside Malvern Residents Association
Greig City Academy	Haringey Community Volunteer	Haselmere Residents Association	Hartleys Projects Ltd	Rookfield Estate Residents Association
Gridline Architecture	Haringey Deaf Group	Haselmere Residents Association	Health and Safety Executive	Sandlings Residents Association
Grosvenor Road Residents Association	Haringey Faith Forum	Haringey Federation of Residents Associations	High Cross Church	The Alexandra Residents Association
Groundwork London	Haringey Ghanaian Community	Palace Gates Residents' Association	High Cross United Reformed Church	Warner Estate Residents Association
Gus Alexander Architects	Haringey Group London	Haringey Living Streets/	Highgate Group Practice	West Green Residents'

	Wildlife Trust	Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth		Association
Highgate Library Action Group	Crouch End Forum	Alexandra Palace Charitable Trust	Home Craft Consultant	HTBG Residents Association
Highgate Newton Community Centre	Fountayne Residents Association	Al-Hijra Somali Community Association	Homebase Ltd	IBI Design Associates
Highgate Primary School	Office of Government Commerce	Alliance Planning	Homebound Social & Luncheon Group	Industrial Dwellings Society
Highgate United Synagogue	Cornerstone Trading	Angolan Community Association	Homes & Community Agency	Innisfree Housing Association
Highgate Wood School	Barratt Development PLC	Arriva London	Hornsey Dental Practice	Irish Community Centre
Highpoint Dental Surgery	Inland Waterways Association	Asian Action Group	Hornsey Housing Trust	Irish in Britain Representation Group
Highway Youth Club	LB Greenwich	Asian Women's Association	Hornsey Housing Trust	Islamic Community Centre
Hill Homes	Metropolitan Development Service	Avenue Gardens Residents Association	Hornsey Lane & Colwick Close RA	Islamic Community Centre Women's Group
Hillcrest Tenants & Residents Association	London TravelWatch	Avenue Gardens Residents Association	Hornsey Lane Association	JA Architecture
Hillside Road Residents Group	St. Peter in Chains RC Infant School	Barnard Hill Association	Hornsey Lane/Colwick Close Residents Association	Jack Cruickshank Architects
Hilltop House Residents Association	Aarogya Medical Centre	Barton Willmore	Hornsey Moravian Church	Jacksons Lane Community Centre
Hollickwood Park Campaign	London Ambulance Service	Barton Willmore	Hornsey Mosque	Jackson's Lane Residents Association
Holly Park Clinic	3 Valleys	Bellway Homes	Hornsey Police Station	James Place/Church Road Residents Association
Holmes Design Ltd	African Caribbean Leadership Council	Beresford Road Residents Association	Hornsey School for Girls	Jason Read Pugh
Holmesdale Road &	Alexandra Palace & Park	Black & Ethnic Minority	Hornsey YMCA	Jesus for the Word

Orchard Road Neighbourhood Watch	CAAC	Carers Support Service		Community Project
Holy Innocents	Christian Action (Enfield) Housing Association	BME Community Services - Selby Centre	Housing 21	Jewish Orthodox Association
Holy Trinity Church	City Planning Group	BPTW	HPN Ltd	John Grooms Housing Association
British Waterways	Civil Engineers Ltd	John L Sims Surveyor	The Old Surgery	LB Harrow
Canal River Trust Head Office	Cluttons LLP	John Perrin & Co	Ethiopian Community Centre	LB Havering
Bruce Grove Primary School	College of Haringey, Enfield and North East London	JS Surveying And Design	Euroart Studios	LB Kensington & Chelsea
Burghley Road Residents Association	Colney Hatch Management Company Ltd.	Julian Cowie Architects	Family Mosaic	LB Lambeth
Buying Solutions	Connexions	Kings Avenue Dental Practice	Fields in Trust	LB Merton
CARA Irish Housing Association	Council of Asian People (Haringey)	Kingsley Place Residents Association	First Plus Planning	LB Newham
CB RE	Crossover Group	Kurdish Advice Centre	FirstPlan	LB Richmond Upon Thames
CGMS Consulting	Cypriot Elderly & Disabled Group	Kurdish Community Centre	Friends of Priory Park	LB Sutton
CGMS Consulting	Department for Business, Innovation and Skills	Kurdish Housing Association	Friends of Priory Park	LB Tower Hamlets
CGMS Consulting	Alexandra Park School	Kush Housing Association	Muswell Hill and Hornsey Friends of the Earth	LB Wandsworth
CgMS Ltd	Department of Environment Food and Rural Affairs	L & P Consultants	Friends of the Earth Tottenham & Wood Green	Lea Valley Primary School
CGMS Ltd	Derek Horne & Associates	Ladybur Housing Co-operativr	Friends, Families and Travellers and Traveller Law Reform Project	League of Jewish Women
Chestnuts Northsid	Dialogue Communicating	Lancaster Road Residents	Fusion Online Limited	LETEC

Residents Assn	Planning	Association		
Chettle Court Ranger Youth (FC)	DP9 Planning Consultants	LB Barking & Dagenham	Genesis Housing Group	Level Ltd
Cheverim Youth Organisation	Drivers Jonas Deloitte	LB Brent	Glasslyn, Montenotte Tivoli Road Residents Assoc.	Liberty Church
Chitts Hill Residents Association	LB Hammersmith & Fulham	LB Croydon	GLC-RAG	Lidl UK
Alderton Associates	Greek Cypriot Women's Organisation	LB Ealing	Grace Organisations - Elderly Care Centre	Lipton Plant Architects
GreenN8 Community Group	Livingstone Youth & Parent Support Centre	Hornsey Historical Society	Lord Morrison Community Centre	Living World Temple
Gt. Lakes Initiative & Support Project	Lomond Close & Brunswick Road RA	Hornsey Vale Community Association	Lordship Lane Infant School	Metropolitan Housing Trust
Haringey Chinese Centre	Lomond Close Residents Association	London First	Lordship Lane Junior School	Metropolitan Police
Haringey Cycling Campaign	London Ambulance Service	Jala - Johnathan A Law and Associates	Loren Design Ltd	Metropolitan Police
Haringey Fire Service	London Basement Company Ltd	Jamait-Al-Nissa	Love Lane Residents Association	Methodist Church
Haringey Peace Alliance	London Bat Group	Joint CAAC	M C Dentistry	Ministry of Justice
Haringey Play Association	London City Airport	Jones Lang LaSalle Planning	Manor House Dental Practice	Morrish Residents Association
Haringey Racial Equality Council	London Forum of Amenity & Civic Societies	King Sturge Llp	Marianne Davys Architects Ltd	Mount Anvil plc
Haringey Somali Community & Cultural Association	London Historic Parks & Gardens Trust	Knight Frank	Mario Pilla Architects	Mulalley and Company Ltd
Haringey Womens Forum	London Housing Federation	Ladder Community Safety Partnership	Markfield Project	Nathaniel Lichfields and Partners
HAVCO	London Islamic Cultural Society	Lambert Smith Hampton	MD Designs	National Federation of Gypsy Liaison Groups
Her Majesty's Court Service	London Islamic Cultural Society	LB Bexley	Metropolitan Development Consultancy	AMEC for National Grid

HFRA (Haringey Federation of Residents Association)	London Port Health Authority	LB Redbridge	Metropolitan Home Ownership	National Market Traders' Federation
Home Builders Federation - London	London Walking Forum	Lee Valley Estates	Metropolitan Police	New Testament Church of God
Home Office	London Waste Ltd	Lee valley Park Authority	Metropolitan Police Service	NHS London Healthy Urban Development Unit
Home-Start Haringey	London Wildlife Trust	London Continental Railway	Middle Lane Methodist Church	Noel Park CAAC
Hornsey CAAC	London Windows Direct Ltd	Dron & Wright	Middlesex Area Probation Service	Tottenham CAAC
Millicent Fawcett Tenants Association	North London Business	Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park	Millennium Neighbourhood Watch & Residents Association	Rapleys
Millyard 7th day Baptist Church	North London Chamber of Commerce	Muswell Hill & Highgate Pensioners Action Group	New Stroud Green Health Centre	Redrow Homes (Eastern) Ltd
Ministry of Praise	North London Partnership Consortium	Muswell Hill Police Station	Newton Architecture	Restoration Community Project
Missionaries of Africa	North London Waste Authority	Muswell Hill Synagogue	NHS London	Rookfield Estate Residents Association
MJW	North London Waste Authority	Muswell Hill Youth Project	Nightingale Primary School	RPS Planning
Moravian Church	North Middlesex Hospital	N London Cultural Diversity Group	Noel Park Infant & Junior School	Sandlings Residents Association
More Space	Caldotec Ltd	N.A.G.	Noel Park North Area Residents Association	Savills
Morris House Dental Surgery	Campsbourne School	National Romany Rights Association	Noel Park Over 55's Club	Savills Planning
Morris House Surgery	Parkside & Malvern Residents Association	Neelkamal Asian Cultural Centre	North Grove Residents Association	St. James Church

Moselle Close Residents Association	Parkside Malvern Residents Association	Neil Wilson Architects	North Harringay Infant & Junior School	Selby Trust
Mountview Arts Centre	Peacock & Smith for WM Morrison Supermarkets plc	Nelson Mandela Residents Association	North London West Indian Association	Shian Housing Association Ltd
Mt. Olivet Baptist Church	Peacock and Smith	New Deal for Communities	Northumberland Park Community School	Haringey Trades Council
Murray Graham Architecture Ltd	PEEC Family Centre	New Image Design	Northumberland Park Tenants & Community Association	Woodstock Road Residents Association
Murray Mackeson Associates	Planning Perspectives	New River Action Group	Northumberland Park Women's & Childrens Centre	Workspace Group
Muswell Colney Residents Association	Pollard Thomas & Edwards Architects	New River Sports Centre	npower	YMCA
Muswell Hill & Fortis Green Association	PTEA	New Space	Oakdale Resident Association / South Tottenham RA	Cabinda Community Association
Muswell Hill & Highgate Handicapped Pensioners Club	Okpanam Women's Association	Patrick Hickey Design	Tottenham CAAC	Veolia Water Partnership
St. Mary's Church	Oromo Community in Haringey	Paul Archer Design	Tottenham Civic Society + Tottenham CAAC	London Parks and Gardens Trust
Stapleton Hall Ltd	Osel Architecture	Paul Buxton Associates	Transport For London	Pinkham Way Alliance
Stewart Ross Association/Dev Plan	Outline Building Limited	Peabody Design Group	Tree Trust for Haringey	Thames Water
Stock Woolstencroft	P R P Architects	Peabody Trust	Triangle Community Centre	Freehold Community Association
Stonewall	P. E. Ottery	Peabody Trust	Turley Associates	Natural England Consultation Service
Sustrans	P.D. Associates	People's Christian Fellowship	Campaign to Protect Rural England (CPRE)	Office of the Green MEPs,
Tan Dental Practice	Palace Gardens Association	Perfect Fit Kitchen & Interiors Ltd	Turnaround Publisher Services	Member of Parliament for Chipping Barnet

Tetlow King Planning	Palace Gates Residents Association	Peter Brades Architects	Pathmeads	One Housing Group
Thames Water Utilities Ltd	Palace View Residents Association	Phoenix Group	Unite Group PLC	Hyde Housing
Thames Water Wastewater Services	Park Lane Close Residents Association	Plevna Crescent Residents Association	Veolia Environmental Services (UK) Plc	Protect Bruce Castle Area (PBCA)
The Alexandra Residents Association	Park Road Dental Practice	Police & Community Working Group	Wards Corner Community Coalition	Pyramid Counselling Services
Haringey Council	Park Road Pool	Port of London Authority	Wards Corner Community Development Group	Quorum Associates
The Mulberry Primary School	Park View Academy	Post Office	Warner Estate Residents Association	Randall Shaw Billingham
The Planning Inspectorate	My Dental Care	Post Office Counters Ltd	Haringey Citizen's Advice Bureau	Redemption Church of God
The Ramblers	Park Vue Dental Practice	Powergen plc	West Green Residents' Association	Remington Road Residents Association
The Theatres Trust	Parsons Brinckerhoff Ltd	Pride of Ferry Lane	Woodlands Park Residents Association	Rennie & Partners
<u>Sustrans</u>	Partridge Way Residents Association	Propel Projects	Sierra Leone Family Welfare Association	Rhodes Avenue Primary School
Tiverton Primary School	Mobile Operators Association	Planning Potential	Sigma Design Build UK	Richard S McCarthy Architect
Viridian Housing	Milmead Industrial Management Ltd.	Shire Consulting	Simon Bocking Building Services	Rie Nijo Architecture
Tamil Community Housing Association Ltd	Martineau	Sunlight Lofts Ltd	Simon Levy Associates	Risley Avenue Infant & Junior School
London & Quadrant	Royal Society for the Protection of Birds	Haringey Allotments Forum	Society for the Protection of Ancient Buildings (SPAB)	Robert Burns Residents Association
Muswell Hill CAAC	Rutland House Surgery	Montagu Evans	Solon Housing Co-operative Housing Services	Robert Harrison Property
Lee Valley Regional Park Authority	Saheli Asian Girls & Young Womens Group	Newlon Housing Trust	Somali Community Group	Rolfe Judd Planning Ltd

LB Southwark	Sakumoh Dance Group	Karin Housing Association	Somali Welfare Association	Royal Mail Property Holdings
British Waterways Board (London Office)	Sanctuary Housing Association	CG Architects	Somerset Gardens Family Health Care	Springfield Avenue Residents Association
Friends of Parkland Walk	Sanctuary Youth Club	Tottenham Police Station	Sophia House Residents Association	St, Paul's and All Hallows CE Junior School
Friends of Woodside Park	Save Britain's Heritage	Methodist Homes	South Harringay Infant School	St. Andrews Vicarage
The Highgate Society	Save the Environment of Park & Palace (STEPP)	Network Housing	South Harringay Junior School	St. Ann's Primary School
Circle Houing Group	Savills Plc	Innisfree HA	South Hornsey Residents Association	St. Anns Church
Highgate CAAC	Scenario Architecture	Arhag HA	Southwood Lane Residents Association	St. Benet Fink
Lien Viet Housing Association	Schamroth + Harriss Architects	Lee Valley Estates	Spenser Associates	St. Cuthbert's Church
Islington and Shoreditch HA	Servite Houses	Logic Homes Ltd	Sport England London Region	St. Francis de Sales RC Infant & Junior School
Apna Ghar Housing Association	Seven Sisters Infant & Junior School	North London Business	Sporting & Education Solution	St. Gildas' RC Junior School
Carr-Gomm	Seventh Day Adventist Church	North London Sub-Region	St. Paul's Church	St. Ignatuis RC Primary School
Circle 33 Housing Trust	Seymour Road Residents Association	Notting Hill Housing Association	St. Peter Le Poer	St. James CE Primary School
Community HT (One HG)	SGI Sokagakkia	Nottinghill Housing Group	St. Thomas More School	St. James Dental Surgery
Grainger PLC	Sierra Leone Community Empowerment Project	Origin Housing	St. Vincent Social & Economic Association	St. John the Baptist Greek Church
Guinness Trust	Space Design Consultants Ltd	Origin Housing	Stagecoach - SELKENT	St. John Vianney Church
Habinteg Housing Association Ltd	Stokley Court Residents Association	Origin Housing Group	Stamford Hill Primary School	St. John's
Hornsey Housing Trust	Stroud Green Baptist Church	Pocket	Stationers Community Centre	St. Marks Methodist Church
Housing 21	Stroud Green Housing	Pocket	Staunton Group Practice	St. Mary Community

	Co-operative			Centre
Teachers Housing Association	Stroud Green Residents Association	Pocket Living	Stephen Donald Architects	St. Mary's CE Infant School
The Abbeyfield Society	STS Structural Engineering	Sahil HA	LB Bromley	St. Mary's CE Junior School
Pinkham Way Alliance	Stuart Crescent Health Centre	Sahil Housing	St. Martin of Porres RC Primary School	St. Mary's Greek Orthodox Cathedral
Muswell Hill Sustainability Group	Stuart Henley & Partners	Sanctuary Group	Turkish Cypriot Community Association	St. Mary's RC Infant & Junior School
S. Mary's Vicarage	Studio 11 Design Ltd	Sanctuary Housing	Iceni Projects Limited	St. Michael's CE Primary School
Networked Neighbourhoods	Studio 136 Architects	Shian Housing Association	Mind In Haringey	St. Paul the Apostle
Cranley Gardens Residents' Association	Suffolk Road Residents' Association	Southgate Churches & Wood Green	Pellings Llp	St. Paul's
The Hawthorns RA and Neighbourhood Watch	Summersby Road Residents Association	St Mungo	Oliver Burston Architects	St. Paul's and All Hallows CE Infant School
Haringey Forum for Older People	Sunshine Garden Centre	Tetherdown Primary School	Highgate URC Church	The Clock Tower Practice
Woodside High School	Sure Youth Foundation Project	Thames Gateway London Partnership	Earlham Primary School	The Gainsborough Clinic
LB Lewisham	Symon Smith & Partners	The Alexandra Surgery	John Rowe-Parr Architects	The Georgian Group
Barker Parry Town Planning Ltd	T.B.F.H.A	The Bowes Road Dental Practice	The Garden History Society	The Green CE Primary School
Lancasterian Primary School	Tasou Associates	The Chine & Cascade Residents Association	Westminster City Council	The Gypsy Council
Exposure Organisation	Temple of Refuge	The Christchurch Hall Surgery	Wood Lane Residents Association	8 Stuart Crescent Health Centre,
Open Door	Templeton Associates	Spur Road Surgery	Gardens Residents Association (GRA)	The John Loughborough School
Muswell Hill Primary School	The Willow Primary School	The Tree Council	Royal Borough of Kingston upon Thames	The North London Gay & Lesbian Association
Family Mediation Service	Millennium Dental	The Tree Trust for	St. John the Baptist Greek	The Surgery

	Practice	Haringey	Church	
Sovereign Group Ltd	St. Paul's Catholic Primary School	The United Reformed Church	Grovelands, Lemsford & Leabank Residents Assoc.	Myddleton Road Surgery
St. Francis de Sales	Rokesly Junior School	The Victorian Society	Tottenham Traders Association	St John's Road Surgery
Leads Design Partnership	Tynemouth Area Residents' Association	The Weymarks Residents Association	Tottenham Trust	Dowset Road Residents Association.
St. Aidan's VC Primary School	Papa Architects Ltd	Affinity Water Limited	Tottenham Women's Aid	Bridge Renewal Trust
Keeping it Simple Training (KIS) Ltd	Friern Village Residents' Association	Tibbalds TM2	Tower Gardens CAAC	Winbourne Martin French (chartered surveyors).
Home Group	Enfield, Haringey and Barnet Samaritans	Tiverton Tewkesbury Residents Association	Tower Gardens Residents Network	Muswell Hill & Fortis Green CAAC
The Parish of Wood Green	Dixon Searle LLP	Tomlinson Tree Surgeons	Town & Country Planning Limited	Transition Crouch End
Ferry Lane Primary School	Mario Pilla Architects Ltd	Tottenham & Wood Green Pensioners Group	Trafalgar Christian Centre	Hornsey Historical Society member.
St. John Vianney School	LB Merton	Tottenham Baptist Church	Transco	MHFGA
Action for Kids Charitable Trust	LB Merton	Tottenham Community Sports Centre	Trinity at Bowes Methodist Church	CgMs Consulting
Muswell Hill Centre	The Bounds Green and District Residents Association	Tottenham Green Sports Centre	Turkish Cypriot Counselling Group	London borough of Enfield
Coleridge Primary School	Rapleys LLP	Tottenham Green Taskforce	Turkish Cypriot Elderly Group	London Borough of Enfield
Stroud Green Primary School	Savills,	Tottenham Irish Women's Group	Turkish Cypriot Forum	Collins & Coward
Barnet, Enfield and Haringey Mental Health Trust	Mario Pilla Architects Ltd	Tottenham Peoples Initiative	Turkish Cypriot Peace Movement in Britain	Hornsey Historical Society member
Our Lady of Muswell Hill Primary School	Planning Bureau - McCarthy and Stone	Tottenham Police Station	Turkish Cypriot Women's Project	A2 Dominion Group
Torrington Park Residents	Turnpike Lane Citizens	Warham Road	Turkish Parents	The Highgate Society

Association	Advice Bureau	Neighbourhood Watch	Association	
Mayor's Office for Policing and Crime	Twentieth Century Society	Charalambous Architectural Consultant	Turkish Youth Association	Urban Vision Partnership Limited Regulatory Services
Haringey Young Carers Project	TWG FoE/FoE London	Welbourne Primary School	Turner Avenue Residents Association	Planware Ltd
We Love Myddleton Road	Tynemouth Medical Practice	West Green Neighbourhood Watch	TfL London Rail	Wood Green Central Area Tenants & Community Assoc.
Architectural Heritage Fund	Uganda Welfare Association	West Green Primary School	LOROL	Wood Green Community Link
Smith Jenkins Town Planning Consultants	Umfreville Road Neighbourhood Watch	West Green Regeneration Group	Metroline	Wood Green Dental Practice
Level Ltd	Unit One Architects	Westbury Dental Practice	Abellio	Wood Green Police Station
SSA Planning Ltd	United Apostolic Faith Church	Westbury Medical Centre	Go Ahead	Wood Green Regeneration
London Gypsy and Traveller Unit	Universal Church of the Kingdom of God	Weston Park Primary School	Greater Anglia	The Archdeacon of Hampstead
Met Police – Safer Transport Team - Haringey	Urban Futures London Ltd	White Young Green Planning	Haselmere Residents Association	Wood Green Youth Club
First Capital Connect	Urban Homes Ltd	Whitehall Community Centre	Haringey Disability First Consortium	Woodberry Down Baptist Church
DSO Edmonton London Ambulance Service	Van Rooyen Design	Willoughby Road Methodist Church	London Travel Watch - Chair of Consumer Affairs	Woodlands Park Infant & Junior School
London Ambulance Service	Veryan Court Residents Association	Wilson & Bell	London Travel Watch	Woodridings Court Residents Association
Arriva	Victim Support Haringey	Winkfield Road Community Centre	Haringey Cycling Campaign	Woodside Residents Association
Metroline	Visit London	Wise thoughts - gaywise	Age UK	Xeva Design Concepts
Transport for London	Vivendi Architects LLP	Women & Medical Practice	Mobility Forum/ Age Concern Haringey	Yabsley Stevens Architects
W. A. Shersby	Voluntary Action Haringey	Wood Green Area Youth	Haringey Disability First	Young Lesbian Group

		Project	Consortium (Access & Transport sub-group)	
Haringey Federation of Residents Associations	Amec Foster Wheeler on behalf of National Grid	Wood Green Black Tenants Group	Fairview	Youth One Stop Shop
Palace Gates Residents' Association	Berkeley Homes (North East London) Ltd	The Queens Mansions Residents Association	Fountayne Residents Association	Youth Theatre Project
Highgate Neighbourhood Forum	Boyer Planning London	Ladder Community Safety Partnership	DP9 Planning Consultants	Zatkhon Construction Co. Ltd.
Sustainable Haringey/ Muswell Hill and Fortis Green Association	Living Under One Sun	Department for Education	Chartered Landscape Architect	NHS Property Services Ltd
Sustainable Haringey Transport Group	Hackney Community Transport Group	Chris Thomas Ltd	Fairview New Homes	HAVCO
Barking-Gospel Oak line users group	London at BT Group and Chair, Haringey Business Board	Haringey NHS	Crouch End Forum	Whittington Hospital Trust
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	Haringey Teaching Primary Care Trust			

Appendix D – Statement of Representation Procedure

Statement of Representations Procedure for the Haringey Local Plan:
Alterations to the Local Plan Strategic Policies Proposed Submission (Regulation 19)
Development Management DPD Proposed Submission (Regulation 19)
Site Allocations DPD Proposed Submission (Regulation 19)
Tottenham AAP Proposed Submission (Regulation 19)

As part of the local Plan, Haringey Council plans to submit four Local Development Documents (Alterations to the Local Plan: Strategic Policies DPD, the Development Management DPD, the Site Allocations DPD, and the Tottenham Area Action Plan) to the Secretary of State for Communities and Local Government. The submission documents are being published for representations.

Title of Documents

Alterations to the Local Plan Strategic Policies: Pre-Submission Consultation
Development Management DPD: Pre-Submission Consultation
Site Allocations DPD: Pre-Submission Consultation
Tottenham AAP: Pre-Submission Consultation

Subject Matter

The Strategic Policies were adopted in 2013 and **sets out the Council's spatial strategy for how Haringey will develop and grow over the period to 2026**. A partial review is proposed to take account of new growth requirements for the Borough as set out in the London Plan (2015) as well as the findings of updated evidence base studies. A schedule of proposed changes is subject to public consultation and comment. The Development Management Policies DPD sets out the policies that will be used to assess and determine planning applications for development across the borough. Once adopted, the policies will supersede those contained in the Haringey Unitary Development Plan (2006).

The Site Allocations DPD **allocates 'proposal sites' for development** where opportunities have been identified, and identifies new or revised designations to which planning policies will apply (including shopping frontages and reclassification of industrial designated land), outside of the Tottenham AAP area. Once adopted, the proposal sites and designations will appear on the Haringey policies map, replacing that which accompanies the Haringey Unitary Development Plan (2006).

The Tottenham Area Action Plan proposes a comprehensive set of policies, proposals and site allocations for future development within the Tottenham area based around the four neighborhoods of Tottenham Hale, Bruce Grove, Seven Sisters/Tottenham Green, & North Tottenham.

Area Covered

The draft Tottenham Area Action Plan area comprises the wards of Northumberland Park, Tottenham Hale and Tottenham Green, and parts of the Bruce Grove, St. Ann's and Seven Sisters.

The Strategic Policies (Partial Review) and Development Management Policies apply to the entire Borough, while the draft Site Allocations DPD applies to that part of the Borough outside of the draft Tottenham AAP boundary.

Period within which representations must be made

Representations must be made between 8th January and received no later than 5pm Friday 4th March 2016.

Where have the documents been made available, and the places and times at which they can be inspected:

The four DPDs and supporting documentation are available for inspection at the following locations:

- Council’s website www.haringey.gov.uk/localplan
- Haringey Civic Centre, Wood Green High Rd, N22 8LE
- Level 6 River Park House, Wood Green, N22 8HQ
- At all of Haringey’s libraries (see details below)

Address	Opening Times	Address	Opening Times
Alexandra Park Library Alexandra Park Road, N22 7UJ	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	Coombes Croft Library Tottenham High Road, N17 8AG	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
Highgate Library Shepherds Hill, Highgate, N6 5QT	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	Hornsey Library Haringey Park, Hornsey N8 9JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm
Marcus Garvey Library 1 Philip Lane, Tottenham Green N15 4JA	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm	Muswell Hill Library Queens Avenue, Muswell Hill N10 3PE	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
St Ann’s Library Cissbury Road, Tottenham N15 5PU	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed	Stroud Green and Harringay Library Quernmore Road N4 4QR	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun Closed
Wood Green Library High Road, Wood Green N22 6XD	Mon – Fri 9am – 7pm Sat 9am – 5pm Sun noon – 4pm		

Making a representation

The Council welcomes comments on the four DPDs. At this stage of the plan-making process, it is important that representations are made in the format included on the representations response form. These are available alongside consultation documents both online and in hard copy form.

Representations can be made via:

- the online response form at <http://haringey.gov.uk/localplan>
- by email at ldf@haringey.gov.uk
- by post to **Local Plan Consultation, Level 6, River Park house, Wood Green, N22 8HQ**

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

Comments must be received by 5pm on Friday 4th March.

For any further enquiries, please email ldf@haringey.gov.uk or contact the Local Plan Team on 020 8489 1479

Appendix E – List of Specific Consultation Bodies

Greater London Authority
English Heritage
The Coal Authority
Environment Agency
The Historic Buildings & Monuments Commission for England
Natural England
London Midland
Harrow Primary Care Trust
Defence Infrastructure Organisation
British Gas PLC Group
EDF Energy
Thames Water Utilities Ltd
Thames Water Property
Veolia Water Central
Homes and Communities Agency - London
Planning Inspectorate
Communities and Local Government
Entec on behalf of National Grid

Appendix F – Letter to the Mayor of London

Mayor of London

City Hall

The Queen's Walk

London

SE1 2AA

Date: **11th January 2016**

Contact : Planning Policy Team

Direct dial: 020 8489 1479

Email: ldf@haringey.gov.uk

Dear Mayor,

Haringey Local Plan Regulation 19 Pre-Submission Public Consultation 8th January 2016 - 4th March 2016

As you are aware, Haringey Council has recently published four Local Plan documents for pre-submission consultation in accordance with Regulation 19(a) of the Town and Country Planning (Local Planning) (England) Regulations 2012.

The four Development Plan Documents are the:

- Alterations to the Strategic Policies 2011 - 2026;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

Copies of these are enclosed.

Pre-submission consultation on the DPDs will run for eight weeks from **Friday, 8th January** to **Friday, 4th March 2016**.

I write to you pursuant to section 24(4)(a) of the Planning and Compulsory Purchase Act (2004) and Regulation 21(1) of the Town and Country Planning (Local Planning) (England) Regulations 2012 to seek your opinion as to the conformity of the pre-submission Development Plan Documents with the London Plan.

In accordance with the statutory requirements, I would be grateful to receive your opinion no later than Friday 4th March 2016.

Yours sincerely,

Matthew Patterson

Matthew Patterson, Head of Strategic Planning

cc. Graham Clements, Greater London Authority

Appendix G – Response Form

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation

The council is publishing four Development Plan Documents for consultation. These are the:

- Alterations to the Strategic Policies (DPD) (adopted 2013)
- Draft Tottenham Area Action Plan: Preferred Option
- Draft Development Management Policies (DPD): Preferred Option
- Draft Site Allocations (DPD): Preferred Option

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” (see DPDs appendices and the guidance note on our website for more information on the “tests of soundness”).

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 on-line:

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:

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	<input type="text"/>	<input type="text"/>
First Name	<input type="text"/>	<input type="text"/>
Last Name	<input type="text"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1	<input type="text"/>	<input type="text"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text"/>	<input type="text"/>
Post Code	<input type="text"/>	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email address	<input type="text"/>	<input type="text"/>

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:

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

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

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

(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.

(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

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

Date:

Appendix H – Respondents to the Pre-Submission Development Management Policies DPD Consultation

ID	Respondent	Wishes to Attend Hearings	ID	Respondent	Wishes to Attend Hearings
1	Hermione Davis	No	28	DP9 on behalf of KA Investments	Not stated
2	Councillor Bob Hare	Yes	29	Anastasia Harrison	No
3	Enid Hunt	No	30	Peter Mcnaughton	Yes
4	Michael Johns	No	31	Stephen Robinson	Yes
5	Graham Laurie	Not stated	32	Jenny Willis	Yes
6	Roswitha Dharampal	Not stated	33	Lynne Zilkha	Not Stated
7	Nigel Tattersfield	Not stated	34	SF Planning obo Jigsaw Housing	Not stated
8	Oscar & Jennifer Hill	Not stated	35	Sport England	Not stated
9	Janet Shapiro	Not stated	36	David Wheatley	Not stated
10	Stroud Green CAAC	Not Stated	37	Muswell Hill & Fortis Green Association	Not stated
11	Highgate Society	Not stated	38	Crossover Group	Not stated
12	Quod on behalf of THFC	Yes	39	Hornsey Historical Society	Not stated
13	Iceni Projects on behalf of Berkeley Homes	Yes	40	Colliers on behalf of Diamond Build	Not stated
14	Canal and River Trust	Not stated	41	Knights obo Power Leisure Bookmakers Ltd	Yes
15	North London Waste Authority	No	42	William Hill	Not stated
16	Rapleys obo LaSalle Investment Management	Yes	43	Steve Simms	Yes
17	Barton Willmore on behalf of Workspace	Not stated	44	Planware obo McDonald's Restaurants Ltd	Not stated
18	Chris Thomas Ltd obo British Sign and Graphics Association	Not stated	45	NHS Property Services	Not stated
19	Alexandra Park and Palace Conservation Area Advisory Committee	Not stated	46	Environment Agency	No
20	Quod obo Muse Developments and the Canal and River Trust	Yes	47	Campaign to Protect Rural England	Not stated
21	CGMS obo Parkstock Ltd	Yes	48	Alan Stanton	Not stated
22	Quod on behalf of St. William	Yes	49	London Borough of Hackney	Not stated
23	CGMS on behalf of Provewell	Yes	50	CGMS on behalf of Highgate Capital LLP	Not stated
24	Montagu Evans on behalf of Hale Village	Not stated	51	Greater London Authority	Not stated

	Properties				
25	Tony Rybacki	Yes	52	Transport for London	Not stated
26	GL Hearn Limited obo Capital and Regional Plc	Yes	53	Historic England	Not stated
27	Hillary Beecroft	Yes	54	Page Green Residents Association	Not stated

Appendix I – Responses to the Pre-Submission Development Management Policies DPD Consultation – Respondent Order

Respondent 1: Hermione Davis

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RDM1	DM1/ 2.1	No	Not Stated	Given the previous representations about light, the current amendment does not address the action in the Council's response to provide requirements that should be adhered to, and as such remains ambiguous.	Link the two sentences in paragraph 2.10 to specify that proposals will be assessed for compliance with The Building Research Establishment (BRE) guidance on Site Layout Planning for Daylight and Sunlight: a guide to good practice.	Disagree. The draft policy in the Preferred Option document has been amended to clarify requirements on protection of amenity (including for sunlight and daylight) and to signpost relevant BRE guidance, which all proposals will be expected to have regard to as a material consideration; however such guidance does not constitute a policy requirement, which linking the sentences as suggested, would seek to imply. The policy provides sufficient flexibility to consider proposals having regard to individual site circumstances. No change.

Respondent 2: Councillor Bob Hare

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
2	RDM2	DM 1	No	Yes	Development Management Plan Policy DM1: Privacy and amenity (D) (b) Privacy and	Development Management Plan Policy DM1: Privacy	Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to

				<p>protection from overlooking. The earlier policy specified distances such as a 20m separation distance between 1st floor habitable room windows, with an additional 10m for each additional floor. I am concerned at the potentially significantly-damaging effect of the 'blanket' removal of these distances. I appreciate that the application of these minimum distances to new developments could make it impossible to group taller buildings as part of a wished-for landscape (eg Tottenham Hale Village), and could affect viability. I recognise that such grouping of new taller buildings has a potentially crucial role in helping create a 'good' landscape in which there are areas of different character. However, the blanket removal of these distances could make possible new developments in areas of existing, older housing stock, including in Conservation Areas, that could severely damage character. In potentially allowing tall developments close alongside lower-rise existing housing stock, the policy without distances could work against the aim of grouping taller</p>	<p>and amenity (D) (b) Privacy and protection from overlooking. I consider that the policies protecting privacy and against overlooking should be re-framed so that distances are again specified where character is of lower-rise.</p> <p>In addition, that there should be specific policy/ies to assist the council as planning authority to define the future landscape of the borough in relation to tall buildings as part of the publicly-defined policy base rather than a site-by-site response to planning applications. The aim of these changes is better planning of the borough's landscapes and character, and</p>	<p>these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances. Policy DM 1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character.</p> <p>The Council considers that the Local Plan sets out a positive framework for managing landscapes, townscapes and views, including in relation to tall and taller buildings, through the DM DPD policies, including DM 5 (Locally Significant Views and Vistas) and DM 6 (Building Heights), which are supported by local evidence.</p> <p>No change.</p>
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					buildings. It could also work against the aims expressed in other policies that are designed to conserve character, particularly in Conservation Areas. It could be said that the policies are internally-inconsistent.	policy that is clearer and better understood by both the public and developers.	
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Respondent 3: Enid Hunt

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RD M3	DM 1 Section D paragraph b	No	Not Stated	I consider the Policy on Privacy and Overlooking to be unsound for the following reasons: 1) It is too vague and reliant on the variable subjective responses of individual planning officers. It will therefore lead to inconsistency in decision-making, and undermine the community's confidence in the planning process. 2) Site cramming and excessive density will result if no prescriptive separation distances are included. This is evidenced by the Connaught House development (HGY/2014/1973 & HGY/2015/1956), which has a density of 305 hr/ha 3) Planning approval will be given for developments which do not comply with separation distances	Policy DM3 of the Draft Development Management DPD (February 2015) should be reinstated, in order to ensure that the Policy on Privacy and Overlooking is clear and can be applied with consistency. Policy DM1 Section D b should therefore be revised as follows: All dwellings should provide a reasonable amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development, including a distance of no less than 20m between	Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.

				<p>as previously included in Haringey's Housing SPD (revoked November 2014) and in the Draft Development Management DPD (February 2015). This is evidenced by the Connaught House development, where a four-storey block of flats comes within 16m of an adjacent two-storey house (HGY/2014/1973). 4) Angled windows and obscure glazing are an unacceptable alternative to a robust and clear policy on separation distances. See planning inspector's report HGY/2005/0979 5) Policy DM3 in the Draft Development DPD was withdrawn following responses of six planning consultants/agents on behalf of developers. I do not consider the decision to drop this policy is sound:- a) It does not reflect the wishes of the local community; almost 90% of respondents and more than 99.5% of those consulted had no objection. Its exclusion at the behest of a few developers conflicts with the stated policy in the Local Plan that people should be put at the heart of change. b) No evidence has been submitted to demonstrate that development is undeliverable with a prescriptive distances policy</p>	<p>facing 1st floor habitable room windows of neighbouring homes. New homes should be designed so they and neighbouring existing homes have 1st floor (2nd storey) windows to habitable rooms that do not face windows of habitable rooms of another dwelling that is less than 20m away. Care should be taken to avoid any ground floor windows being overlooked although there will normally be natural screening (garden walls and fences) that mean this is not possible. There should be an additional 10m for each additional floor; a minimum of 30m between a 2nd floor window and any window that could be overlooked on the ground, 1st or 2nd floor, 40m between a 3rd floor window and any window that could be overlooked on the ground, 1st, 2nd or 3rd floor and so on, up to a separation of 60m (no greater separation is considered necessary).</p>	<p>No change.</p>
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3	RD M4	DM 7 B a, b	No	Not Stated	This policy is too vague and will lead to subjective and inconsistent decision-making by individual officers, thus undermining public confidence in the planning process.	The following should be added to make the policy sound, in order to avoid inconsistency in planning decisions: "New buildings on backlands and infill sites should be no taller than surrounding adjacent properties"	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively. Policy DM 7 requires that proposals on backland and infill sites satisfy DM 1 and relate appropriately and sensitively to the surrounding context, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area. No change.
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Respondent 4: Michael Johns

ID	Rep ID	Policy / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		/ Figure					
4	RDM5	DM 1	Not stated	Not stated	<p>I wish to comment on changes made to the draft plan which was the subject of consultation last year. The draft policy prescribed separation distances for a new development of at least 20m at first floor level for facing habitable rooms, with an additional 10m for each additional floor. This provision is no longer included in the pre-submission version. The evidence behind this withdrawal is not stated. It seems to me clear that some such restriction is required to protect the privacy and amenity of neighbours. It may be argued that the general provision in DM1 to relate positively to their locality having regard to building heights and form, scale and massing prevailing round the site suffices, but this leaves a wide scope to subjective judgement. With the best will in the world, planning officers and committees may find it difficult to defend any particular proposal against attempts by developers with a financial interest in cramming buildings together as tightly as possible unless there is an objective criterion for judging the issue. To provide evidence in support of my comment, the planning application to redevelop Connaught House off</p>	<p>In my view, this experience shows that the only satisfactory strategy to ensure that overcrowding does not occur is to prescribe general limits on separation distances.</p>	<p>Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>Prior decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>

					Connaught Gardens N10 (HGY/2013/2421) was approved even though the new four storey block of flats is less than 20 metres from neighbouring properties. The building is now being constructed and it is already apparent that this is a substantial reduction in amenity for neighbours.		
4	RDM6	DM 7	Not stated	Not stated	For the same reason I believe that DM7, the proposed backlands policy should include a specific provision that building heights should be subordinate to surrounding properties on the lines of previous policies. In small infill developments there needs to be a strong control on height to prevent developments overshadowing local properties, with Connaught House being an example where the absence of such controls has led to an oppressive loss of amenity to neighbours.	I believe that DM7, the proposed backlands policy should include a specific provision that building heights should be subordinate to surrounding properties on the lines of previous policies.	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively. Policy DM 7 requires that proposals on backland sites satisfy DM 1 and relate appropriately and sensitively to the local area, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area. No change.

Respondent 5: Graham Laurie

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
5	RDM7	DM 1	Not	Not Stated	I wish to comment on Policy	No response	Disagree. The specific separation

			Stated		<p>DM1. The policy DM1 is too loosely framed. The word "appropriate" is far too indefinite and open to debate as to what is and what is not "appropriate".</p> <p>The deleted policy DM3 was much more helpful to residents concerning overlooking and privacy.</p>	given	<p>distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change.</p>
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Respondent 6: Roswitha Dharampal

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
6	RDM8	DM 1	Not Stated	Not Stated	The Council is now relying on its amenity policy (DM1 section D on page 11) to control overlooking, but the weakness in this policy is clearly demonstrated by the recent approval for the development of the Connaught House site. It is too subjective and too dependent on how developers and planning officers assess amenity. According to the withdrawn prescriptive distance policy, there should	I would like to request the re-instatement of the prescriptive distances policy, and the addition of an amendment to specify building heights on backlands site, to ensure that future developments do not compromise	<p>Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>The Council does not consider it necessary to include additional criteria</p>

					<p>be at least 40m distance between facing habitable rooms for four-storey buildings.</p> <p>There is nothing like this distance on any side of flats development, in particular Teresa Walk. Likewise the four-storey houses on the other part of the site are too close to houses in Connaught Gardens, their rear windows being some 25m apart. The result is a development which is too high and overbearing and completely out of character in this neighbourhood.</p>	<p>the privacy and amenity of neighbouring properties.</p>	<p>to specify building heights on backland sites within DM 1. This matter is dealt with through Policies DM 6 and DM 7.</p> <p>Prior decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>
6	RDM9	DM 7	Not Stated	Not Stated	<p>The proposed Backlands Policy (DM7 on page 19) is not prescriptive on heights. Unlike the withdrawn guidance SPG 3c, it does not specify that building heights should be subordinate to surrounding properties. The need for this is clearly demonstrated by the excessive heights of the Connaught House development which will loom over its neighbours.</p>	<p>I would like to request the reinstatement of the prescriptive distances policy, and the addition of an amendment to specify building heights on backlands site, to ensure that future developments do not compromise the privacy and</p>	<p>Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively.</p> <p>Policy DM 7 requires that proposals on backland sites satisfy DM 1 and relate appropriately and sensitively to the local area, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the</p>

						amenity of neighbouring properties.	surrounding area. Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation. No change.
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Respondent 7: Nigel Tattersfield

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
7	RDM10	DM 1	Not stated	Not stated	It is of considerable concern that the Local Plan now excludes the separation of distances policy for residential buildings and that the proposed Backlands Policy is not prescriptive on heights of buildings.	I would urge Haringey to reinstate the distances policy and to amend the Backlands Policy so that future developments do not adversely affect the privacy and amenity of neighbouring properties.	The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances. No change.
7	RDM11	DM 7	Not stated	Not stated	It is of considerable concern that the Local Plan now excludes the separation of distances policy for residential buildings and that	I would urge Haringey to reinstate the distances policy and to amend the	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively.

					the proposed Backlands Policy is not prescriptive on heights of buildings.	Backlands Policy so that future developments do not adversely affect the privacy and amenity of neighbouring properties.	Policy DM 7 requires that proposals on backland sites satisfy DM 1 and relate appropriately and sensitively to the local area, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area. No change.
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Respondent 8: Oscar & Jennifer Hill

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
8	RDM12	DM 1	Not sated	Not stated	Some proposed changes in the Plan are unacceptable. In particular, the abandonment of the previous precise distances between buildings that would minimise intrusive overlooking should be restored. The suggested alternative of a judgment on amenity is flawed. Anything that depends on judgment is bound to introduce fuzziness. Inevitably, developers	No response given	Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to

					will argue for a lesser distance than the people who would live there and be overlooked. In arguments of this sort the developers will always win, if necessary taking the case to appeal. The Council cannot afford the cost of prolonged litigation and has to give up sooner than the developer. There is no argument when the distance is stated in metres. The same considerations apply to the height of new developments.		individual site circumstances. No change.
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Respondent 9: Janet Shapiro

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM13	DM 1	Not Stated	Not Stated	<p>The plan does not reassure residents that their interests will be protected at a time when local land value is high, making it profitable for speculators to invest in over-development in order to reap a high return.</p> <p>Favoured developments are for houses & flats for sale, closely packed with high densities; these will not be available to ordinary workers. Haringey needs the workers that are being priced out of accommodation in the borough.</p>	The plan should include clear regulations to assist good practice in Haringey planning committees. The regulations should be clear and include specifications that developers are not allowed to ignore.	<p>The introduction of planning regulations is outside the scope of the Local Plan.</p> <p>Haringey's Local Plan includes policies to secure provision for a range of housing types and tenures in order to meet objectively assessed needs. Development proposals will be assessed having regard to the Council's adopted Local Plan policies, the London Plan and relevant material considerations such as</p>

				<p>Even the very weak obligation to build 'affordable' homes is frequently dodged, as the policy set out on in DM13 page 28 does not apply to sites with fewer than 10 additional homes.</p> <p>Too few rented homes are provided and the term 'affordable' is based on local market prices rather than on local average earnings. Most building taking place will not be available to key workers, or low paid workers.</p> <p>The Development Plan should, within its powers, set out regulations that will make sure that developments are not the slums of the future. The regulations should be clear and include specifications that developers are not allowed to ignore.</p> <p>Planning committees should be discouraged from setting aside recommended separation distances, heights, basement depths and densities. Building Control also needs to be robust.</p> <p>Current practice is that planning guidance is vague. The vague guidelines make it possible that</p>		<p>supplementary guidance like the London Housing Design Guide.</p> <p>No change.</p>
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					<p>applicants for planning permission could appeal a rejection and win compensation. Councillors serving on Planning Committees are thus prevented from judging correctly whether the application damages the amenity of residents. Also, the process does not enable them to assess the overall and accumulative impact of a succession of developments upon the local environment.</p>		
9	RDM14	DM 1	Not Stated	Not Stated	<p>Specifications in earlier policies should not be weakened.</p> <p>Separation distances for residential buildings were specified in the Housing SPD (revoked November 2014) and included in consultations last year.</p> <p>The prescribed separation distances were at least 20m at first floor level for facing habitable rooms, with an additional 10m for each additional floor, implying that for four-storey buildings the separation distances should be 40m.,</p> <p>It was developers that requested withdrawal on this policy. If this policy is not restored future crowding of residential homes can easily be imagined. Residents not</p>	<p>Please include specified minimum distances</p>	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is appropriate and sufficiently robust to ensure the protection of amenity and privacy whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p>

					<p>developers should set down minimal standards.</p> <p>The earlier stipulated distances have been signally flouted in a development given planning permission near my house. [5-9 Connaught House HGY/2015/1956]</p>		No change.
9	RDM15	DM 1 Page 11 bullet D	Not Stated	Not Stated	<p>It is not sufficient to make vague requirements relating to overlooking and privacy. The aspirations expressed in 2.9 cannot be achieved without recommended distances.</p> <p>Building heights are mentioned in DM6, but in relation to those areas where very high buildings are to be allowed. DM6 Page 17 Policy A says</p> <p>For all development proposals, the Council expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1</p> <p>This should also apply to backland developments, but there are no specifications on maximum heights allowed for new build that could</p>	<p>Please insert that, in general, within residential settings, new buildings should not exceed the height of existing homes.</p>	<p>Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively.</p> <p>Policy DM6A on building heights does apply to backland development proposals that would fall under Policy DM7. There is no need to repeat policy requirements throughout the document.</p> <p>No change.</p>

					affect how the aspirations expressed in section DM1 could be achieved.		
9	RDM16	DM 7	Not Stated	Not Stated	<p>In section DM7, page 19 – 20, points 2.44 – 2.48 admit the necessity of allowing backland developments to meet the Borough’s housing needs and correctly indicate that policy set out in earlier needs to be observed, but without specified rules.</p> <p>This is precisely the type of development where residents’ amenity may be damaged. This is acknowledged on page 19 bullet points B – in particular d, but no specifications for distances, heights or densities are included. Applicants with strong investment interests are bound to submit arguments to satisfy such a vague policy.</p> <p>Also, what is not said is that the permitted new homes may not be affordable – and thus do not satisfy the needs of the Borough.</p> <p>Note that the development behind my house was originally Social Housing; even well-paid key-workers are not likely to be able to purchase homes in the new development. The obligation to</p>	Minimal specified heights and separation distances need to be added to section DM7 on backland developments.	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers Policy DM1 is appropriate and sufficiently robust to ensure the protection of amenity and privacy on backland development proposals having regard to individual site circumstances.</p> <p>Policy DM6A on building heights does apply to backland development proposals that would fall under Policy DM7. There is no need to repeat policy requirements throughout the document.</p> <p>The objectively assessed housing needs for the borough includes a significant need for market housing as well as for affordable provision.</p> <p>Previous decisions on</p>

					<p>provide 'affordable housing was avoided, by two developers making separate applications for two parts of the site, both parts for fewer than 10 new dwellings, although they cooperate for building operations. HGY/2015/1956</p> <p>I am not sure how the applications escaped the clause in DM 13 page 29</p> <p>The affordable housing requirement will apply to: Sites that are artificially sub-divided or developed in phases;</p>		<p>proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>
9	RDM17	DM 10 DM 11	Not Stated	Not Stated	<p>The assurances under DM10, including mixed use, repair of existing homes etc. are good for the community. DM11 refers to mix referring to size & occupancy, but social mix should also be promoted. One good thing that came of the 'Right to Buy' is that tenants and owner-occupiers live side-by side. Developers often seek to segregate tenants and home-owners, and this should be vigorously opposed.</p>	<p>DM11 refers to mix referring to size & occupancy, but social mix should also be promoted.</p>	<p>Provision for Social mix is provided for in policies DM13, DM14, DM15 & DM17. Policy DM12D requires mixed tenure schemes to be designed to be 'tenure blind'.</p> <p>No change.</p>
9	RDM18	DM 15	Not Stated	Not Stated	<p>On page 31 for DM15, point 3.28 includes the needs of older people. Support for home adaptation should be specifically promised. Also greater provision of homes suitable for older people, to rent or</p>	<p>Support for home adaptation should be specifically promised. Also greater provision of homes suitable for</p>	<p>Home adaptations do not normally require planning permission and, therefore, a policy supporting home adaptation would be redundant. DM15 supports</p>

					to buy should be a council priority. This may contribute to freeing up family homes that are badly needed.	older people, to rent or to buy should be a council priority.	provisions for older persons housing. As set out at paragraph 3.29, the provision of older persons housing will have regard to the benchmark in the London Plan, which suggest provision should be made for 100 older person's home per annum within Haringey but this would be in the context of delivering the borough strategic requirement of 1,502 homes. No change.
9	RDM19	DM 16	Not Stated	Not Stated	Front gardens converted to hard standing is included.	More advice and guidance should be given to residents to conserve gardens; in particular residents should be advised to use paving with absorption properties to avoid heavy rain putting a strain on drains.	Noted. The DM DPD sets out a presumption against the loss of garden land, and policies to promote sustainable drainage. The Council may give consideration to the preparation of further guidance to assist with implementation of Local Plan policies. No change.
9	RDM20	DM 18	Not Stated	Not Stated	Residential conversions are making increasing use of basements. Guidelines are given in DM18, but building control needs to be active in checking that water courses and neighbouring properties are not badly affected.	No response given.	This is the intent of Part A of the Policy. No change.
9	RDM21	DM 20	Not	Not Stated	The green open space used for	The	It is not clear what

			Stated		<p>children's play has been lost in the approved development behind my house. In addition 5 mature lime trees were felled before the developer submitted his application. Both are a loss to the local environment. HGY/2015/1956</p>	<p>recommendations in DM20 should be applied in backland developments.</p>	<p>"recommendations" are being referred. Policy DM 7 sets out requirements for managing backland development, having regard to the protection of local character and amenity.</p> <p>Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>
9	RDM22	Not stated	Not Stated	Not Stated	<p>Responsibility to Haringey Residents</p> <p>Government policy makes council controlled building of homes difficult, but the plan should reference the 'Haringey Housing Needs Assessment June 2007'. Since then the situation will have been made worse; the shortfall of 3,405 social units/year over the following 5 years.</p> <p>The plan should indicate how Haringey intends to minimise the impact of government cuts and austerity policies on low-income household in the borough. The plan should retain with proper investment the borough's council housing estates. A substantial new</p>	<p>The plan should indicate how Haringey intends to minimise the impact of government cuts and austerity policies on low-income household in the borough.</p> <p>The plan should retain with proper investment the borough's council housing estates.</p> <p>The policy that reduces council homes must be reconsidered in favour of a policy</p>	<p>Haringey's Strategic Policies Local Plan sets out the Council's approach to secure provision for a range of housing types and tenures in order to meet objectively assessed need and the Borough's strategic housing target over the plan period. The DM DPD helps give effect to the Strategic Policies and include requirements for affordable housing as part of new housing schemes.</p> <p>The Alterations to Strategic Policies Local Plan sets out the strategic approach to housing estate renewal and improvement. This affects only a very small portion of Council</p>

					<p>build programme for rented council homes is needed together with schemes for new build protected against the 'Right to Buy' Act so that the housing stock is not eroded.</p> <p>Demolition of housing estates is not the best solution, being disruptive for families schooling etc. with some not having secure tenure to support them during the renovations or in the interim. This method destroys local community support networks. It also involves partnership with large companies with all their commercial interests to contend with. To date there are over 3,000 council homes at risk of demolition.</p> <p>The policy that reduces council homes must be reconsidered in favour of a policy that respects communities and increases the stock of secure affordable tenancies.</p>	<p>that respects communities and increases the stock of secure affordable tenancies.</p>	<p>housing stock and, ultimately, seeks its replacement in better quality development.</p> <p>Adopted Policy SP 2 includes criteria to ensure no net loss of existing affordable housing floorspace in development.</p> <p>The Council's Housing Strategy sets out Council's ambitious plans to build new Council homes and sets out the Tenancies Policy with respect to existing, new & renewed Council housing development.</p> <p>No change.</p>
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Respondent 10: Stroud Green CAAC

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RDM23	DM 1	No	Not stated	The above policies are too loosely framed and not	Not stated specifically.	The specific separation distances were a useful yardstick for visual privacy but

				<p>supplemented in subsequent policies to ensure the public will have confidence in planning decisions. DM3 (January 2014 version) provided clarity and should be reinstated to ensure confidence in decision-making which may otherwise prove inconsistent, undermining the credibility of the planning process. Acceptable distances should take into account land gradients relative to existing buildings.</p> <p>We note that DM3 (Jan 2015 version) was dropped following responses from a small number of agents responding to the Jan 2015 consultation on behalf of their clients with vested interests in particular sites and with no evidence to support their comments. We do not therefore consider the decision to drop DM3 was sound. Lack of response in support of DM3 should not lead to the assumption that it was generally regarded as unsound.</p>		<p>adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers Policy DM1 is appropriate and sufficiently robust to ensure the protection of amenity and privacy having regard to individual site circumstances.</p> <p>No change.</p>
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					Are neighbours in the opinion of the Examiner better protected by the change from 'reasonable' to 'appropriate'?		
10	RDM24	DM 1	No	Not stated	It should be made clear whether this policy takes precedence over policies relating to conservation areas	Not stated specifically.	Policy DM 1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character, including historic character and the setting of heritage assets. No change.
10	RDM25	DM 7	Not Stated	Not Stated	This policy is welcomed with reservations. Building heights should be subordinate to surrounding properties.	Not stated specifically.	Policy DM6 applies to proposals on backland and infill sites and requires that building heights be of an appropriate scale which responds positively to the site's surroundings, the local context and achieves a high standard of design in accordance with Policy DM1. The Council therefore considers appropriate policies are provided to manage buildings heights with respect to backland and infill development. No change.
10	RDM26	DM 9	Not Stated	Not Stated	It is not clear how DM9 relates to DM1	Not stated specifically.	There is no conflict between the two policies. Policy DM1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character. In the case of historic environments this includes an area's historic character , the significance of the historic assets affected, their setting, and architectural

							features in accordance with Policy DM9. No change.
10	RDM27	DM9	Not Stated	Not Stated	We note that the earlier DM12 has been entirely re-written following comments from English Heritage, Highgate CAAC and others regarding inconsistencies with NPPF and other matters. This policy, having been entirely rewritten, is being consulted upon for the first time. We trust the Examiner will consider what has been dropped (including the earlier DM33) to ensure our heritage assets will be sufficiently protected	Not stated specifically.	The draft policy in the Preferred Options document has been amended to ensure consistency with the NPPF and to take account of the comments received. This is the intended purpose of publishing early drafts for comment. The resulting policy, Policy DM9, is therefore considered to be appropriate and robust having been subject to that process. The earlier version of the DPD and the responses received to previous consultation stages will be submitted to the Planning Inspector for consideration. No change.
10	RDM28	DM 9 Para 2.26	Not Stated	Not Stated	Satellite dishes have an adverse effect on Conservation Areas where located in a position where they are visible from CAs. Para 2.26 suggests that policy is flexible on this point which would be unacceptable	Not stated specifically.	This paragraph highlights the requirement for the need to assess proposals for telecommunications in CAs against DM9 as well as DM3. No change.
10	RDM29	DM 9 Para 2.58	Not Stated	Not Stated	The word 'agreed' in line 5 is inappropriate.	Last line: add 'Area' between 'Conservation'	Minor modifications: factual correction of title - add 'Area' between 'Conservation' and

					The function of a Heritage Statement is a means for the Applicant to suggest to LBH what the significance of the Asset is. On receipt of that document, LBH may agree, or not, with that assessment	and 'Advisory'	'Advisory' Comments noted. For clarity including a Minor modification to remove 'agreed' on the fifth line.
10	RDM30	DM 9 Para 2.59	Not Stated	Not Stated	'Highest, moderate and low significance' Cite source of these criteria	Not stated specifically.	These are relative terms for describing significance for the purpose of assessing proposals and are dependent on a number of considerations. See for example current best practice guidance, Historic Environment Good Practice Advice in Planning Note 2. No change.
10	RDM31	DM 11, Para 3.3, 3rd bullet	Not Stated	Not Stated	'... strategic Borough target of 40%' Evidence base may suggest this is the case now but it would be regrettable to give a firm target with the result that advantage cannot be taken of fluctuations in the economy and land values. This policy should be framed in the same way as the Carbon reduction one : Haringey will achieve targets in line the national and London Plan policy and/or:	Not stated specifically.	Evidence from the Borough's latest viability assessment – Haringey Development Appraisals & Viability Testing, Jan 2015 – strongly indicates that the existing borough wide target (50%) is not viable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure that the provision of affordable housing does not harm the delivery of housing. This is a proposed amendment in the Alterations to the Strategic Policies (Alt49). Targets for affordable housing should only be set locally having regard to local needs and circumstances. Fluctuations are able to be picked up through monitoring undertaken annually and can result in

							recommendations update to the Local Plan, as necessary. No change
10	RDM32	DM 11, Para 3.8	Not Stated	Not Stated	'robustly seek... affordable housing' Adopt a Haringey or, if it comes forward, a London Plan, format for viability statements that are transparent, robust and reliable with Section 106 agreements to allow claw-back of profits in excess of those anticipated to be returned to LBH, ring-fenced for social or affordable housing.	Not stated specifically.	Agreed. Haringey's current format for viability appraisals is set out in the Planning Obligations SPD. If a London-wide format is produced, the Planning Obligations SPD will be updated to reflect this. Where appropriate, s106 agreements include review mechanisms and/or claw-back arrangements to ensure the maximum reasonable amount of affordable housing is secured on individual development sites. Any uplift, if achieved, could result in further affordable housing being provided on site or a financial contribution in lieu, the latter 'ring-fenced' for affordable housing provision. No change.
10	RDM33	DM 12	Not Stated	Not Stated	Para 3.15 states full width extensions would not normally be acceptable. Guidance on when full width extensions would be acceptable would be helpful and aid sound and consistent decision-making in Conservation Areas and elsewhere	Clarification recommended	It is not appropriate to provide the guidance suggested as an acceptable full width extension is considered to be an exception. This paragraph allows for proposals to be assessed on a case by case basis, having regard to site specific circumstances. If a proposal for a full width rear extension is submitted it would be expected to meet the requirements of the relevant policies as well as the guidance set out in para 3.15 and DM1.

							No change.
10	RDM34	DM 18	Not Stated	Not Stated	<p>These policies are adopted by other Councils in London-look at Westminster Council and Camden Council</p> <p>Recent basement applications in Haringey involved inappropriate proposals that could have been dealt with if these clauses had been in effect</p> <p>We suggest reference should be made to DM24 including to the supporting documents (see our comments on DM24)</p> <p>We suggest that issues of safety, nuisance, etc during construction should be in a separate clause on Construction Management Plans which should be based on HSE Guidelines</p>	<p>The residential basement policy needs strengthening. We suggest that the following clauses be added to the policy for residential properties:</p> <p>a) basement development does not involve the excavation of more than one storey below the lowest original floor level (except in the case of swimming pools) and should be within the existing footprint of the property</p> <p>b) natural ventilation and daylighting should be used where habitable accommodation is being provided and ventilation and lighting</p>	<p>The Plan should be read in its entirety and proposals should meet the requirements of all relevant policies, including flooding, SUDS, sustainability, energy efficiency, and landscaping, including arboricultural impacts.</p> <p>The Council considers that the suggested changes repeat policies contained elsewhere in the Local Plan and that such duplication is unwarranted.</p> <p>The requirement for a Construction Management Plan would form part of the Basement Impact Assessment (see para 3.44), as it is likely to include the mitigation measures proposed to manage any amenity impacts identified.</p> <p>No change.</p>

					<p>should be energy efficient</p> <p>c) Given the significant disruption of basement construction on adjoining neighbours, a construction management plan which demonstrates that the applicant will comply with the relevant parts of the Council's Code of Construction Practice and be aware of the need to comply with other public and private law requirements governing development of this kind</p> <p>d) a basement extension will not be permitted where the purpose is to create a new dwelling house in</p>	
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						<p>the residential property or for the purpose of further subdividing the existing residential property</p> <p>e) where a basement extension is to a terraced property, the impact on the terrace as a whole (not just the adjoining property) needs to be considered to ensure it is stable, particularly if the terrace is on a slope</p> <p>f) the cumulative impact of a number of basement developments in the same terrace needs to be carefully considered.</p> <p>g) provide a satisfactory landscaping</p>	
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						<p>scheme, incorporating soft landscaping, planting and permeable surfacing as appropriate;</p> <p>h) not result in the loss of trees of townscape, ecological or amenity value and, where trees are affected, provide an arboricultural report setting out in particular the steps to be taken to protect existing trees; there should not be a net loss of trees. New replacement trees should be at least semi-mature and of indigenous species</p> <p>i) incorporate sustainable urban drainage measures to reduce peak rate of run-off or any</p>	
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						<p>other mitigation measures recommended in the structural statement or flood risk assessment;</p> <p>j) protect the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape are sensitively designed and discreetly located;</p> <p>k) protect heritage assets, safeguarding significant archaeological deposits and in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where</p>	
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						this contributes to significance;	
10	RDM35	DM 24	Not Stated	Not Stated	Flood risk arising from breach of Reservoirs not adequately covered	It should be made clear which, or both, of these documents are provided in evidence: Haringey's Strategic Flood Risk Assessment 2103 and JBA's Flood Risk Assessment 2015. Both documents state that bedrooms should not be located in basements within areas indicated in NRIM. It is not clear from policy if these recommendations apply.	DM18 (B) states that habitable rooms will not be permitted in basements in areas prone to flooding. JBA's SFRA replaces and updates the North London Level 1 SFRA and replaces the SFRA issued by Haringey in March 2013. Therefore, the relevant and up to date evidence study is the SFRA 2015. This detail will be updated for accurate referencing. No change.
10	RDM36	DM 33	Not Stated	Not Stated	This policy is welcomed	Not stated specifically.	Support noted.
10	RDM37	DM 34	Not Stated	Not Stated	This policy is welcomed	Not stated specifically.	Support noted.
10	RDM38	DM 35	Not Stated	Not Stated	This policy is welcomed	Not stated specifically.	Support noted.
10	RDM39	DM 40	Not Stated	Not Stated	Loss of employment floorspace. The policy as	Not stated specifically.	Disagree. Para 22 of the NPPF states that planning policies should avoid the

					<p>written is unsound</p> <p>Where a development involves demolition of a building containing employment floorspace, the same area of floorspace must be provided in the proposed building. Replacing lost floor space elsewhere will reduce flexibility and vitality of economic activity essential for growth. Using Section 106 monies for training loses the floor space altogether and would therefore be unacceptable.</p>		<p>long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. It goes on to state that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The Council considers DM40, along with other relevant policies, complies with the NPPF and is the most appropriate approach to managing the loss of non-designated employment land and floor space.</p> <p>No change.</p>
10	RDM40	DM 44	Not Stated	Not Stated	<p>No equivalent policy at first consultation stage. Map required</p> <p>'a window display or other appropriate town centre frontage'</p> <p>Ye Olde Sweete Shoppe in Quernmore Road N4 has received much local opprobrium and mockery. It is doubtful that BRE Daylight and Sunlight standards have been reached in the dwelling</p>	Not stated specifically.	<p>This policy was part C of DM53 in the Preferred Options version. The policy was amended in response to Reg 18 consultation comments and was separated to ensure clarity for policy implementation, and renamed in terms of the Town Centres hierarchy.</p> <p>Mapping neighbourhood parades and other non designated frontages is too detailed for a borough wide plan. This may be more appropriate at a Neighbourhood Plan level.</p> <p>Previous decisions on proposals made</p>

					<p>which has replaced the shop. The Design Quality and Quality of Life (Jan 2015 DM2) of the dwelling is compromised. However it is noted that Quernmore Road is shown as a Local Shopping Centre on the Policy Map. We assume non-retail uses would not include conversion of shops to residential within a Conservation Area or elsewhere</p>		<p>under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>Proposals in neighbourhood parades and other non designated frontages will be expected to meet the requirements set out in DM44 as well as other relevant policies. Conversion of town centre uses to residential will not be permitted on designated frontages.</p> <p>No change.</p>
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Respondent 11: Highgate Society

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
11	RDM41	DM 1 A(a), A(b), B(a), B(b), D(b)	No	Not stated	<p>The above policies are too loosely framed and not supplemented in subsequent policies to ensure the public will have confidence in planning decisions.</p> <p>DM3 (January 2014 version) should be reinstated to ensure confidence in decision-making which may otherwise prove inconsistent, undermining the credibility of the planning process.</p> <p>We note that DM3 (Jan 2015 version) was dropped following responses from a small number of</p>	Not stated specifically.	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers Policy DM1 is appropriate and sufficiently robust to ensure the protection of amenity and privacy having regard to individual site circumstances.</p>

					agents responding to the Jan 2015 consultation on behalf of their clients with vested interests in particular sites. We do not therefore consider the decision to drop DM3 was sound. Lack of response in support of DM3 should not lead to the assumption that it was generally regarded as unsound.		No change.
11	RDM42	DM 1 (A&B)	No	Not stated		It should be made clear whether this policy takes precedence over policies relating to conservation areas	Policy DM 1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character, including historic character and the setting of heritage assets. No change.
11	RDM43	DM 7	No	Not stated	This policy is welcomed with reservations	Building heights should be subordinate to surrounding properties.	Policy DM6 applies to proposals on backland and infill sites and requires that building heights be of an appropriate scale which responds positively to the site's surroundings, the local context and achieves a high standard of design in accordance with Policy DM1. The Council therefore considers appropriate policies are provided to manage buildings heights with respect to backland and infill development. No change.

11	RDM44	DM 9	No	Not stated	<p>We note that the earlier DM12 has been entirely re-written following comments from English Heritage and Highgate CAAC regarding inconsistencies with NPPF and other matters.</p> <p>This policy, having been entirely rewritten, is being consulted upon for the first time. We trust the Examiner will consider what has been dropped (including the earlier DM33) to ensure our heritage assets will be sufficiently protected</p>	Not stated specifically.	<p>The draft policy in the Preferred Options document has been amended to ensure consistency with the NPPF and to take account of the comments received. This is the intended purpose of publishing early drafts for comment. The resulting policy, Policy DM9, is therefore considered to be appropriate and robust having been subject to that process. The earlier version of the DPD and the responses received to previous consultation stages will be submitted to the Planning Inspector for consideration.</p> <p>No change.</p>
11	RDM45	DM 9 (D)	No	Not stated		The words 'do not' appear to be missing before 'detract' in line 3	<p>The word 'detract' refers to existing sites and buildings that 'detract' from the character of the conservation area, rather than to the potential new development.</p> <p>No change.</p>
11	RDM46	Para 2.26	No	Not stated	<p>Satellite dishes have an adverse effect on Conservation Areas where located in a position where they are visible from the CA.</p> <p>Para 2.26 suggests that policy is flexible on this point which would be unacceptable</p>	Not stated specifically.	<p>This paragraph highlights the requirement for the need to assess proposals for telecommunications in CAs against DM9 as well as DM3.</p> <p>No change.</p>

11	RDM47	Para 2.58	No	Not stated	The function of a Heritage Statement is a means for the Applicant to suggest to LBH what the significance of the Asset is. On receipt of that document, LBH may disagree, or not, with that assessment	Not stated specifically.	Comments noted. For clarity including a Minor modification to remove 'agreed' on the fifth line.
11	RDM48	Para 2.58	No	Not stated		Last line: add 'Area' between 'Conservation' and 'Advisory'	Minor modifications: factual correction of title - add 'Area' between 'Conservation' and 'Advisory'
11	RDM49	DM 11 Para 3.3 3 rd bullet, and Para 3.8	Not Stated	Not Stated	'... strategic Borough target of 40%' 'robustly seek... affordable housing' Evidence base may suggest this is the case now but it would be regrettable to give a firm target with the result that advantage cannot be taken of fluctuations in the economy and land values. This policy should be framed in the same way as the Carbon reduction one : Haringey will achieve targets in line the national and London Plan policy and/or: Adopt a Haringey or, if it comes forward, a London Plan, format for viability statements that are transparent, robust and reliable with Section 106 agreements to allow claw-back of profits in	Not stated specifically.	Evidence from the Borough's latest viability assessment – Haringey Development Appraisals & Viability Testing, Jan 2015 – strongly indicates that the existing borough wide target (50%) is not viable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure that the provision of affordable housing does not harm the delivery of housing. This is a proposed amendment in the Alterations to the Strategic Policies (Alt49). Targets for affordable housing should only be set locally having regard to local needs and circumstances. Fluctuations are able to be picked up through monitoring undertaken annually and can result in recommendations update to the Local Plan, as

					excess of those anticipated to be returned to LBH, ring-fenced for social or affordable housing.		necessary. Agreed. Haringey's current format for viability appraisals is set out in the Planning Obligations SPD. If a London-wide format is produced, the Planning Obligations SPD will be updated to reflect this. Where appropriate, s106 agreements include review mechanisms and/or claw-back arrangements to ensure the maximum reasonable amount of affordable housing is secured on individual development sites. Any uplift, if achieved, could result in further affordable housing being provided on site or a financial contribution in lieu, the latter 'ring-fenced' for affordable housing provision. No change.
11	RDM50	DM 12	Not Stated	Not Stated	Para 3.15 states full width extensions would not normally be acceptable. Guidance on when full width extensions would be acceptable would be helpful and aid sound and consistent decision-making.	Not stated specifically.	It is not appropriate to provide the guidance suggested as an acceptable full width extension is considered to be an exception. This paragraph allows for proposals to be assessed on a case by case basis, having regard to site specific circumstances. If a proposal for a full width rear extension is submitted it would be expected

							to meet the requirements of the relevant policies as well as the guidance set out in para 3.15 and DM1. No change.
11	RDM51	DM 18 A(a-g)	Not Stated	Not Stated		We suggest in 'b' that reference is made to DM24	Agreed. Minor Modification to include a reference to Policy DM24 at Part A(b) of Policy 18.
11	RDM52	DM 18 A(h-i)	Not Stated	Not Stated	We suggest that issues of safety, nuisance, etc should be in a separate clause on CMPs	In 'h', we suggest adding after 'harm to' in first line : 'neighbours or people passing over their land; to'	Disagree. The Council considers that Part (h) of DM18 is comprehensive and already has regard to neighbours and all others through the inclusion of ' <i>nor place unreasonable inconvenience on the day to day life of those living, working or visiting nearby</i> '. The suggested change would therefore not add further to the Policy. No change.
11	RDM53	DM 18 B	Not Stated	Not Stated		We suggest reference should be made to DM24 including to the supporting documents (see our comments on DM24)	The proposed minor modification to Part A(b) would already ensure the cross reference between Policy DM18 and Policy DM24. A further reference is unnecessary. No change
11	RDM54	DM 33	Yes	Yes	Not stated specifically.	Not stated specifically.	Noted.
11	RDM55	DM 34	Yes	Yes	Not stated specifically.	Not stated specifically.	Noted

11	RDM56	DM 35	Yes	Yes	Not stated specifically.	Not stated specifically.	Noted
11	RDM57	DM 40 B	Not Stated	Not Stated	Loss of employment floorspace. The policy as written is unsound.	Where a development involves demolition of a building containing employment floorspace, the same area of floorspace must be provided in the proposed building. Replacing lost floor space elsewhere will reduce flexibility and vitality of economic activity essential for growth. Using Section 106 monies for training loses the floor space altogether and therefore unacceptable.	Disagree. Para 22 of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. It goes on to state that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The Council considers DM40, along with other relevant policies, complies with the NPPF and is the most appropriate approach to managing the loss of non-designated employment land and floor space. No change.
11	RDM58	DM 44	Not Stated	Not Stated	No equivalent policy at first consultation stage. Map required	Not stated specifically.	This policy was part C of DM53 in the Preferred Options version. The policy was amended in response to Reg 18 consultation comments and was separated to ensure clarity for policy

							implementation, and renamed in terms of the Town Centres hierarchy. Mapping neighbourhood parades and other non designated frontages is too detailed for a borough wide plan. This may be more appropriate at a Neighbourhood Plan level. No change
11	RDM59	DM 44 A	Not Stated	Not Stated	'a window display or other appropriate town centre frontage' Ye Olde Sweete Shoppe in Quernmore Road N4 has received much local opprobrium and mockery. It is doubtful that BRE Daylight and Sunlight standards have been reached in the dwelling which has replaced the shop. The Design Quality and Quality of Life (Jan 2015 DM2) of the dwelling is compromised. We assume non-retail uses would not include conversion of shops to residential in a Conservation Area	Not stated specifically.	Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation. Proposals in neighbourhood parades and other non designated frontages will be expected to meet the requirements set out in DM44 as well as other relevant policies. Conversion of town centre uses to residential will not be permitted on designated frontages. No change.

Respondent 12: Quod on behalf of THFC

ID	Rep ID	Policy / Para /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure					
12	RDM60	DM1	Yes	Yes	THFC support the incorporation of policy DM3: 'Privacy and protection from overlooking' from the Development Management Policies Preferred Option Consultation (February 2015) into policy DM1 and the removal of prescribed distances between neighbouring homes. This is consistent with the Mayor's Housing SPG (para. 2.3.30) which recognises the unnecessary restrictions that can be placed on development through using minimum separation distances.	Not stated	Support noted.
12	RDM61	DM6	Yes	Yes	THFC support the amendments to Figure 2.2 to define wider Tall Building Growth Areas, which for Northumberland Park aligns with the North Tottenham Growth Area. This will allow the exact location for tall buildings to be defined through site analysis and careful design. This is also consistent with paragraph 2.48 of the Pre-submission Tottenham AAP which describes meeting the housing targets of the AAP area through higher density and well-designed taller buildings in accessible locations.	Not stated	Support noted.
12	RDM62	DM40	No	Not stated	As previously drafted, Policy DM52: 'Loss of employment land and floorspace' of the Development Management Policies Preferred Option Consultation (February 2015) made provision for the loss of employment floorspace to non-employment uses, subject to a number of criteria. These included that the site was no longer suitable or viable for its existing or an alternative business or industrial use; or a change of use was required to enable site redevelopment as part of a strategically coordinated regeneration scheme or	Not stated	The Council has prepared an up-to-date technical evidence base to inform Local Plan preparation. This includes the Employment Land Study (2015) which clearly sets out future long-term employment land and floorspace requirements for B Class (commercial and industrial) uses, and therefore supports the strategic

				<p>programme, with demonstrable wider community benefits that outweigh those of retaining the land exclusively for industrial and business use. Supporting paragraph 5.26 of DM52 stated:</p> <p>“The Council will strongly resist proposals involving the loss of employment land. However, in line with the National Planning Policy Framework, it is important to promote economic development by ensuring that sites are not needlessly protected when there is no reasonable prospect of them coming forward for specific types of development.”</p> <p>As previously drafted, Policy DM52 did not exclude designated employment land from conversion to non-employment uses, where the criteria were met. Policy DM52 is similar to Haringey Unitary Development Plan (UDP) Policy EMP4 Saved (March 2013): ‘Non Employment Generating Uses’ which allows for, subject to criteria, the redevelopment or change of land and buildings in an employment generating use. Again, policy EMP4 does not exclude designated employment land from changes of use.</p> <p>As currently drafted, Policy DM40: ‘Loss of Employment Land and Floorspace’ of the Development Management DPD Pre-Submission Version (January 2016), now only applies to non-designated employment land. The draft policy also introduces a sequential approach to delivering alternative uses.</p>	<p>approach to safeguard Haringey’s designated and non-designated employment sites, as set out in SP 8. This approach is considered to be in general conformity with the London Plan as confirmed by the Mayor for London.</p> <p>Through the Local Plan process, the Council has undertaken a review and reconfiguration of its employment land portfolio, taking account of local evidence and having regard to market signals, to designate SIL and LSIS for safeguarding, and LEA, where more a flexible approach to land uses will be permitted. Through this process some sites have changed designation (i.e. changed from LSIS to LEA). The approach is considered to be consistent with NPPF paragraph 22. It is noted that the LEA-RA designation provides a positive framework for delivering appropriate area base regeneration in accordance with the Spatial Strategy.</p>
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				<p>THFC object to the application of policy DM40 to only non-designated employment sites. The exclusion of designated employment sites would be inconsistent with paragraph 22 of the NPPF which states:</p> <p>“Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p> <p>The Government’s recommended methodology in Planning Practice Guidance for planning for future economic development needs recommends (Reference ID: 2a-032-20140306) that provision should be based on sectoral and employment change, demographic change and associated employment needs, analysis of past take-up and future sectoral requirements, and consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics. Tottenham is an identified area of significant population, demographic and sectoral (economic) change and policy should reflect that.</p> <p>This point is evidenced in the change in employment by sector experienced in</p>	<p>Policy DM 40 sets out criteria for considering proposals on non-designated sites where a loss of employment land and floorspace is proposed. The Local Plan has been amended from the Regulation 18 (February 2015) version to remove similar ‘tests’ for loss of employment land and floorspace for designated sites. This is owing to the need to safeguard these sites to meet objectively assessed need and the Borough’s strategic employment target, and to ensure these sites are not compromised by the introduction of inappropriate non-employment uses in order to deliver the Spatial Strategy.</p> <p>No change</p>
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				<p>Tottenham in recent years. As can be seen in the figure below, Tottenham has seen its most significant decline in jobs in the manufacturing sector: (SEE REP FOR Figure 1 Graphic)</p> <p>Whilst Figure 1 may suggest that employment in transport and storage sectors has increased, a more fine-grained approach indicates that this recent growth is mainly accounted for by industries such as computer programming and other telecommunications activity, and road and rail transport (altogether accounting for 90% of net growth in the Transport, Storage, Comms and Information sector) rather than in traditional warehousing or manufacturing-related sectors (based on analysis of 4-digit SIC level Annual Business Inquiry and Business Register and Employment Survey data 2003-2013).</p> <p>Based on London-wide sectoral forecasts from the London Plan (2015), this change is anticipated to continue to reduce the need for protection of this type of employment space over the plan period due to a downturn in the number of jobs it is projected to create: (See rep for Figure 2 Graphic)</p> <p>Coupled with this, existing demand for employment by current residents (based on JSA sought occupation, DWP, 2015) is overwhelmingly for personal service, sales and customer service roles. Industrial jobs were sought by only 1 in 5 unemployed people in the area. In fact more of Haringey's unemployed were seeking management, professional and</p>		
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				<p>associate professional jobs than were looking for jobs in industry. The following chart shows the mis-match between sought occupations of existing unemployed residents and the type of jobs protected by traditional warehouse sectors: (See rep for Figre 3 graphic)</p> <p>Given these changes in the employment and demographic make up in Tottenham, clear policies should be in place to allow designated employment sites to be redeveloped where there is no reasonable prospect of the site being used for the allocated employment use.</p> <p>The exclusion from policy DM40 is also inconsistent with Strategic Policy SP8: ‘Employment’ which states that Locally Significant Industrial Sites (LSIS) will be safeguarded where they continue to meet demand and the needs of modern industry and business. A clear provision should be made for the redevelopment of LSIS, or parts of LSIS, which don’t meet the demands and needs of modern industry and business.</p> <p>The tests set out in saved UDP Policy EMP4 and Preferred Options Policy DM52 provide adequate criteria to rigorously assess whether or not the loss of employment land was acceptable and there is no reason why the policy has been changed in the Pre-Submission version of the document.</p> <p>It is also unclear why the link in Preferred Options Policy DM52 to strategically</p>		
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				<p>coordinated regeneration schemes or programmes has been taken out. THFC are currently bringing forward redevelopment proposals at 500 White Hart Lane for a mixed use residential-led scheme and a planning application was submitted on 4 March 2016. The 500 White Hart Lane site occupies part of an LSIS, albeit it is partly vacant and the site as a whole is significantly underutilised. Through the redevelopment of the site, there is the opportunity to help the regeneration of the Love Lane housing estate in Tottenham through the early decant of Love Lane residents to the 500 White Hart Lane site. The scheme has been designed to meet Haringey's Regeneration Team's requirements and in conjunction with prospective residents. This has a clear link to the Pre-submission version of Strategic Policy SP2: 'Housing' which supports strategic improvements of Haringey's housing estates (including Love Lane). The removal of a reference to strategically coordinated regeneration schemes within the loss of employment land/floorspace policy could therefore make it more difficult for such schemes to come forward.</p> <p>Overall and for the reasons set out above, THFC consider that Pre-submission policy DM40 is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, effective or consistent with national planning policy and is therefore as drafted unsound.</p>		
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Respondent 13: Icen Projects Ltd on behalf of Berkeley Homes (North East London Limited)

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RDM63	DM 1	Yes	Not stated	Berkeley Homes support the proposed change to the policy (previous Policy DM3) which removes the arbitrary rule of 20m separation between properties which is restrictive, ineffective and is not justified in a central London context.	No response given.	Support noted.
13	RDM64	DM 6	Not stated	Not stated	The policy continues to state that tall buildings will only be acceptable in areas identified on Figure 2.2. It is suggested that this policy should not put a ceiling on the appropriate height of buildings in the borough. Proposals for tall buildings should be considered on their individual merits and the Council should not rely on an arbitrary figure.	The policy should be amended so that building heights are not applied rigidly to each site within each area. The borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying onerous policies such as this will inevitably hinder the Council's delivery of housing.	The policy does not prescribe building heights. It sets out a positive framework for managing the development of tall and taller buildings in order to deliver the Borough's spatial strategy. This approach is justified by evidence, as set out in the supporting text. The Council considers that the policy is the most appropriate and sufficiently flexible to consider proposals having regard to individual site circumstances. No change.
13	RDM65	DM 11	No	Not stated	As outlined for Policy SP2, this approach to density is not	Para 3.9 of the supporting text suggests an approach	The Council considers that the suggested changes are

					<p>consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density but the quality of the proposed development and the place it will create.</p> <p>The Haringey Urban Characterisation Study 2014 is helpful but should only be used in practice as an indicative baseline guide to development and the policy should be updated to reflect this. An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space.</p>	<p>such as this but the wording of the Policy itself should be relaxed, to allow easy application</p>	<p>currently reflected in the Policy DM 11(B).</p> <p>No change.</p>
13	RDM66	DM 13	No	Not stated	<p>Policy DM13 D, is not wholly supported. It states that viability assessments must be based on a standard residual valuation approach, with the benchmark existing use land value taken as the existing/alternative use value.</p> <p>Viability and deliverability are key to securing national policy's aspiration of sustainable development, as outlined in Paragraph 173 of the National Planning Policy Framework</p>	<p>The RICS Guidance (2012: pp.38) additionally explains that 'Competitive returns can only be achieved in a market context (i.e. Market value) not one which is hypothetically based with an arbitrary mark-up applied, as in the case of EUV. As such, we request that this element of the policy is amended accordingly and we refer to our earlier representations at</p>	<p>In line with the London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land</p>

					(NPPF). Land or site value is central to the consideration of viability and the most appropriate way to assess this value can vary. The CLG guidance on section 106 and affordable housing requirement states: 'Any purchase price used should be benchmarked against both market values and sales prices of comparable sites in the locality' (with our emphasis added)	Regulation 18 stage in this respect.	use designation. No change.
13	RDM67	DM 40	Not Stated	Not stated	As stated in previous representation, in relation to draft Policy DM40 Ab), there is no evidence to suggest why a three-year marketing campaign is required. It is typical in other London boroughs to exercise periods of 12 months. The NPPF resists the long term protection of sites, where there is no reasonable prospect of the site being used for that purpose, having consideration to market signals and relative need for different land uses. Given the nature of land acquisition and development process this length of time would hinder actual delivery of needed new homes.	No response given.	The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy . The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating

							uses where there is no demonstrable demand for that use. No change.
13	RDM68	DM 41	Not Stated	Not stated	No response given.	<p>We suggest that the policy objective is changed to consider the important supporting role housing can play in sustaining vibrant and vital town centres, in light of changing shopping habits, the evidence from the Outer London Commission (third report) and the Experian consumer expenditure survey.</p> <p>Similarly, the policy should make specific reference to encourage a greater density of development within town centre locations which are also often hubs for public transport and sustainable travel in order to ensure the policy is compatible with emerging changes to the National Planning Policy Framework NPPF.</p>	<p>Policy SP 11 sets out the Council's strategic approach to town centre development, and paragraph 5.3.19 is clear that housing can play a role in supporting town centre vitality. The DM DPD gives effect to SP 11. Policy DM 41 deals with main town centre uses as defined in the NPPF, and objectives for housing are not considered appropriate in this policy. The Council considers that Policy DM 45 addresses the suggested changes, providing further detail both in regard of housing and the intensification of uses within town centres.</p> <p>No change.</p>

Respondent 14: Canal and River Trust

ID	Rep ID	Policy / Para /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure					
14	RDM69	Section 2 and 4	Reserve position on this matter	Not Stated	In March 2015 the Trust responded to Publication of the Development Management Policies Consultation Document. The Trust made comment on section 2: Housing and section 4: Environmental Sustainability. Whilst the Council's response to our comments on section 4 appear to be covered in the regulation 18 statement, our comments on section 2 do not appear to have been considered by the Council. As such we are unable to comment on the soundness of the plan in this regard as we are unable to understand the Council's position on the matter of the inclusion of a policy on mooring.	Not stated	The response to the Trust on residential moorings was dealt with in respect of Alt47 to the Strategic Policies. This states that the Council considers that the authority for increasing residential moorings lies with the Canal & Rivers Trust. Any proposal should first be discussed with the Lee Valley Regional Park Authority. While the Council is likely to support additional residential moorings, as a means of providing relatively cheap living accommodation, such provision would be treated as 'windfall' development, in regard to its contribution to meeting Haringey's housing needs. The role of the LPA in respect to moorings is to ensure waterside development does not detract from waterways usage. No specific policy is therefore required and the Council considers the impacts of increased residential moorings can be adequately addressed by other relevant policies in the Local Plan such as waste management Policy DM4 and DM29 on waste water and water supply. No change
14	RDM70	Section 2	Not Stated	Not Stated	As such we reserve our position to that set out in our previous response and request a meeting with the Council to discuss this matter. I	Not stated	The Council is happy to meet with the Trust at its earliest convenience. It would also be useful to understand what is meant by 'residential mooring'

					would also like to request a meeting with the Council to discuss our representations on the Development Management DPD.		as Council understands this can take several different forms, with each having different regulatory requirements.
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Respondent 15: North London Waste Authority

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	RDM71	DM 1	No	Yes	Broadly NLWA considers that this policy is sound and the Authority notes the positive changes to this policy since the previous draft which make it more explicit. However, NLWA considers that the policy should recognise that design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development. Paragraph A is not explicit in terms of recognising that the design requirements may be usefully reflective of the nature of the development. For instance, NLWA considers that for industrial employment facilities set within designated employment and industrial areas greater emphasis should be placed on supporting their potential to generate employment and ensuring that they do not give rise to adverse	The Authority considers that paragraph A should be amended to make this policy workable in practice, as follows, (with the proposed amendments in bold italics): <u>Haringey Development Charter</u> A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area, <i>however design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development.</i> The Council will support design-led development proposals which meet the following criteria:	The current policy wording is clear that all proposals, irrespective of land use, will be expected to deliver high quality design having regard to the local context and setting, and further details in respect of policy implementation are set out in the supporting text. The Council considers that the policy is sufficiently flexible to consider proposals having regard to individual site circumstances and the nature of development. No change.

					<p>local environmental impacts. Good functional design will be appropriate in such locations and the policy should be applied flexibly and should not be used to impose onerous and costly requirements on such developments.</p> <p>Specifically the design of a new local waste facility should not be subject to the same design requirements as for example the redevelopment of an iconic building in the borough. Waste facilities in particular should be recognised as essential community infrastructure ultimately funded by local taxpayers, where the emphasis should in most cases be on a functional design which protects amenity and the local environment rather than on “iconic” but typically more costly schemes.</p>	<p>a Relate positively to neighbouring structures, new or old, to create a harmonious whole;</p> <p>b Make a positive contribution to a place, improving the character and quality of an area <i>but additionally reflecting the nature of the development</i>;</p> <p>c Confidently address feedback from local consultation;</p> <p>d Demonstrate how the quality of the development will be secured when it is built; and</p> <p>e Are inclusive and incorporate sustainable design and construction principles.</p>	
15	RDM72	DM 30	No	Yes	<p>The Authority considers that there is a lack of clarity regarding what the phrase “to achieve levels” means. As waste facilities will be permitted (or exempt from environmental permitting) by the Environment Agency, the permit will set the prescribed levels for compliance on a range of environmental criteria. The reference to ‘achieving levels’ is</p>	<p>The Authority suggests that the following changes are made to this policy (the proposed changes are listed in bold italics):</p> <p>“..... that any impacts caused by the operation of the facility can be controlled to achieve levels that <i>such that the facility</i> will not have a</p>	<p>Agreed. The suggested changes will be included in a schedule of proposed minor modifications.</p>

					unclear in terms of what levels it is referring to and adds confusion given the permitting requirements which will also apply.	significant adverse effect on human health and the environment <i>in line with regulatory requirements.</i> "	
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Respondent 16: Rapleys on behalf of LaSalle Investment Management

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	RDM73	DM 3 (B)	No	Not stated	Criterion B requires the management of the new privately owned public spaces, including their use and public access, will need to be agreed by Council. We object to this, as it is onerous to require the private estate management matters to be agreed by the Council, and it goes beyond the role of planning policy.	We therefore request that the second sentence of Criterion B is deleted.	Disagree. In requiring the provision of new privately owned public space within new development, the Council has an obligation to ensure such space is maintained over the long-term, in terms of use, access and quality. This can only be ensured through agreement to the proposed management of these spaces. No change
16	RDM74	DM 6 Para 2.42	No	Not stated	Policy DM6's supporting paragraph 2.42 refers to the Urban Characterisation Study (2015) (UCS). As we commented in the previous representations, we are concerned with the recommended approach for Wood Green in this document. It recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and	Not stated.	The Urban Characterisation Study is referenced in the supporting text as part of the technical evidence base informing and justifying the policy approach. The UCS is but one consideration in establishing the appropriate building height for broad locations and individual sites. As set out in paragraph 2.42,

					terraces that line Hornsey Park Road and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. We therefore <i>object</i> to the reference to this document unless it is updated as further work is undertaken, as evidence base for tall buildings or a material consideration in the determination of planning applications.		the Council will prepare further planning guidance on tall buildings. The Local Plan includes site allocations along the eastern area of the railway line. No change
16	RDM75	DM 6	No	Not stated	<p>Policy DM6 (Building Heights): We <i>object</i> to Criterion B which requires proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in ‘community benefit’. There is no justification or explanation for requiring justification in relation to community benefit. The Growth Area is likely to include tall/taller buildings in order to intensify and increase the development capacity in order to facilitate growth and regeneration. As such, it is considered unnecessary and onerous to justify community benefit.</p> <p>We welcome and support the amendments made to Map 2.2 as it identifies the Wood Green Growth Area as potential locations appropriate for</p>	Not stated	As set out at paragraph 2.40, taller buildings can be prominent and visual features which affect everyone. While good design will ensure these buildings are visually attractive, this is a requirement of all development and, therefore, further mitigation is required to justify their need. No change

					Tall Building, in line with the strategic objectives. As the Tall Building Validation Study (November 2015) indicates, further detailed work will be necessary including assessment of individual site that would be subject of any planning applications, as required by Criterion E. As such, the approach to define the Growth Area as potential Tall Building locations is considered appropriate.		
16	RDM76	DM6	No	Not Stated	Sub-criterion c under Criterion C requires proposals for Tall Buildings should be consistent with the Council's Tall Buildings and Views Supplementary Planning Document ('SPD'). The NPPF defines SPDs as documents which add further detail to the policies in the Local Plan and can be used to provide further guidance for development on specific sites or on particular issues such as design. The NPPF further advises that SPDs should be used where they can help applicants make successful applications. It makes it clear that it is not part of the Development plan. As such documents will not go through the examination process, we are concerned that the criterion requires proposals to be "consistent with" yet to be prepared SPD, for which no clarification is provided as to what additional guidance will cover over and above the requirements set out in the DM in	It is considered that the criterion is amended to state: <i>"have regard to be consistent with the Council's</i> Tall Buildings and Views Supplementary Planning Document."	Agreed. The suggested changes will be included in a schedule of proposed minor modifications.

					relation to tall buildings, key views and design. In order to ensure that such a SPD is not used to add unnecessary and unjustified requirements for proposals for tall buildings.		
16	RDM77	DM 10	Yes	Not stated	We support Criterion A which supports and directs proposals for new housing to sites allocated for residential development, including mixed use residential development. However, as noted in our representations on the Site Allocations document, this policy would be ineffective unless the Site Allocations document specifically allocates mixed use development sites, namely the Sites SA18 and SA21, to include residential use.	Not stated	The Site Allocations DPD does allocate sites for residential or mix-use development, as shown in the table for each allocation under the indicative development capacity. Policy DM10A is therefore consistent with the Site Allocations DPD. No change.
16	RDM78	DM13	No	Not stated	Sub-criterion a) of Criterion A refers to the borough-wide target of 40% affordable housing provision. As we objected (to the Strategic Policies SP2) we consider that for development proposals within Haringey Heartland, a lower affordable housing target should be set, to ensure the deliverability of redevelopment schemes to facilitate regeneration of the area.	A lower affordable housing target should be set, to ensure the deliverability of redevelopment schemes to facilitate regeneration of the area.	The borough-wide affordable housing delivery target has been set having regard to local evidence, including the SHMA and Haringey Development Appraisals Viability Testing (2015), which suggests that a 40% target, from all sources, is appropriate to ensure the provision of much needed affordable housing does not harm development viability. No change.
16	RDM79	DM15	No	Not stated	Policy DM15 (Specialist Housing): Criterion C supports student accommodation to be delivered as part	In line with the London Plan (paragraph 5.53B),	As set out in DM13, unsecured student accommodation will trigger the provisions of the

					<p>of new major development schemes in Haringey's Growth Areas and within or at the edge of a town centre, if a requirement for further student accommodation is identified in the future. We support this aspect of the policy, as student accommodation could be delivered on long term redevelopment opportunity sites in Haringey Heartland such as our client's sites.</p> <p>Criterion D sets out criteria based assessment for proposals for student accommodation. We <i>object</i> to sub-criterion f) as it is considered onerous to require the provision an element of affordable student accommodation in the event that it is not made available for occupation by members of a specified educational institution(s).</p>	<p>the provision of an element of affordable student accommodation should be subject to viability, and in the context of average student incomes and rests for broadly comparable accommodation provided by London universities. The supporting paragraph 3.33 should also be amended.</p>	<p>Affordable Housing policy, which includes at Part D viability considerations.</p> <p>No change.</p>
16	RDM80	DM 20	No	Not stated	<p>Criterion C seeks all development providing new or replacement open space wherever possible, to connect to the All London Green Grid. The policy's supporting paragraph 4.15 explains that Figure 4.3 shows the existing and proposed Green Grid, including possible links to other points of interest in the Borough such as cultural quarter and town centres.</p>	<p>As Figure 4.3 shows new proposed green grid running through the Heartlands and identified as cycle and walk to green space. In order to clarify the purpose of the Green Grid, the supporting paragraph 4.15 should be</p>	<p>Disagree. The Green Grid is a network of green and open spaces integrated with the Blue Ribbon Network of rivers and waterways, which may include but is not limited to pedestrian and cycle link opportunities. The Council considers that the purpose of the Green Grid is suitably explained in paragraph 4.16.</p> <p>No change.</p>

						amended to state that proposed Green Grid is a pedestrian and cycle link opportunity.	
16	RDM81	DM 22	No	Not stated	Criterion B requires all major developments to incorporate site-side communal energy system, irrespective of whether it is connected to Decentralised Energy and to optimise opportunities for extending such systems beyond the site boundary. It should be noted that the London Plan Policy 5.6 requires development proposals <i>examine opportunities</i> to extend the <i>Combined Heat and Energy (CHP) system</i> beyond the site boundary. It is therefore unreasonable to require development proposals to optimise opportunities for extending the communal energy system, irrespective of viability and feasibility. We support the amendment to sub-criterion d) of Criterion C which will take account of technical feasibility and financial viability of a connection to an existing or planning future Decentralised Energy network where connection is expected.	We therefore <i>object</i> to sub-criterion b) and consider that it should be amended as follows: “all development that incorporates site-side communal energy systems should optimise opportunities for extending such systems beyond the site boundary, <i>and where feasible and viable...</i> ”	Agree in part. The Council considers that the policy is in general conformity with the London Plan. However to ensure consistency, the Council will include a minor modification to replace ‘optimise’ with ‘examine’.
16	RDM82	DM 38	Not Stated	Not Stated	The policy supports proposals for mixed use development within a LEA – Regeneration Area (RA), where this is necessary to facilitate the renewal and	DM 38 represents repetition of Strategic Policy SP8 which states	Local Plan Policy SP 8 sets out the strategic approach for managing land within Haringey’s employment land

				<p>regeneration, including intensification, of existing employment land and floorspace. However, this represents repetition of Strategic Policy SP8 which states that RAs can include uses appropriate in a mixed use development including residential uses, and Policy SP1 identifies Wood Green/Heartlands as a Growth Area, where development is required to maximise opportunities. Whilst we do not object to the principle of supporting mixed use development in RAs, we are concerned with the number of criteria for proposals for mixed use development:</p> <p>It is noted that Paragraph 6.14 in relation to criterion a) states that applicants will be required to submit a viability assessment that demonstrates the proposed mixed use is necessary to enable the delivery of employment uses, and mixed use proposals will not be acceptable unless the introduction of a non-employment use is demonstrably necessary to make the employment development viable. There is no clear justification why this requirement is necessary, as Policy SP8 permits mixed use development within the LEA - RAs. The policy is considered to be onerous as the term 'employment uses' could be interpreted to mean traditional employment uses (those within B Class uses) whilst</p>	<p>that RAs can include uses appropriate in a mixed use development.</p> <p>Criterion DM 38 A (a) should be removed as it would add an unnecessary requirement to developers to justify the principle of mixed use development, which is enshrined in the Strategic Policies particularly in relation to sites allocated for mixed use redevelopment in the Site Allocation document or in the emerging AAP.</p> <p>As currently worded, it (DM 38 A.c.i) is not unclear what this policy is seeking to achieve. We therefore <i>object</i> to this and</p>	<p>hierarchy. SP 8 provides in-principle support for mixed use development within the LEA-RA designation. DM 38 gives effect to SP 8, providing further detail on LEA - RA, including where mixed-used proposals are appropriate. The Council considers DM 38 is necessary to ensure delivery of the Borough's spatial strategy.</p> <p>The Council disagrees with the suggested change to remove DM 38 A (a). The Local Plan is clear on the need to protect employment land to meet objectively assessed need and the Borough's strategic employment target. In line with the NPPF, the Local Plan provides flexibility to respond to market signals, and DM 38 therefore makes allowance for employment enabling mixed use schemes where viability is an issue. The Council is seeking that proposals justify there is demonstrable need for non-commercial uses to cross subsidise and enable employment development – it is not requiring developers to justify the principles of mixed use within LEA-RA, as this has</p>
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				<p>employment generating uses are permissible under Policy SP8. Furthermore, Policy SP1 identifies Wood Green/Heartlands as a Growth Area, where both jobs and housing are sought to be delivered through an intensive mixed use development. As such, this criterion should be removed as it would add an unnecessary requirement to developers to justify the principle of mixed use development, which is enshrined in the Strategic Policies particularly in relation to sites allocated for mixed use redevelopment in the Site Allocation document or in the emerging AAP.</p> <p>The criterion seeks to maximise the amount of floorspace to be provided within the mixed use scheme having regard to development viability. This requirement is ambiguous and would be difficult to demonstrate the “maximum” amount of employment floorspace that can be achieved on site. This requirement does not take account of the type of employment uses, the quality of employment floorspace and the number of jobs generated from them, and the relationships with other uses proposed within a mixed use development. We therefore object to this requirement as currently worded.</p>	<p>suggest the following:</p> <p>“The provision of employment generating floorspace should represent improvements to the existing provision, having regard to...”</p> <p>This should not be expressed as a requirement for development proposals to enable connection to high speed broadband.</p>	<p>been established through the Local Plan policies.</p> <p>With regard to requirements of DM 38 A (b), paragraph 6.14 of the supporting text sets out that the maximum amount of floorspace will be considered having regard the minimum required non-commercial floorspace to make the development viable. The Council does not consider this criterion to be ambiguous. Further, Policy DM 38 A (c) provides that the Council will take into account other factors such as quality of floorspace and number of jobs delivered.</p> <p>The policy seeks to ensure that enabling mixed-use schemes improve the site’s suitability for employment generating uses over the plan period, thereby contributing to delivery of the spatial strategy. This may be through the introduction of new employment floorspace, or improvements to existing provision. Objection is noted, but Council disagrees with the suggested change for reasons set out above.</p>
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				<p>The criterion requires provisions of demonstrable improvements in the site's suitability for continued employment and business use having regard to a number of sub-criterion including provision for an element of affordable workspace, where viable. As currently worded, it is not unclear what this policy is seeking to achieve. We therefore <i>object</i> to this and suggest the following:</p> <p>“The provision of employment generating floorspace should represent improvements to the existing provision, having regard to...”</p> <p>It is not unclear why proposals in the Regeneration and Growth Areas are required to investigate gypsy and traveller accommodation needs. We request clarification and justification for this for a further opportunity to comment.</p> <p>Residential amenity can be protected by design and appropriate mitigation measures. Therefore, we consider that it is inappropriate to require an adequate “separation of uses,” as it would compromise the development potential for allocated mixed use development sites.</p> <p>We would agree that any proposals</p>		<p>As LEA-RA offer flexibility for land uses, the Council considers it appropriate that proposals investigate opportunities for sites to meet identified need for gypsy and traveller accommodation, where suitable.</p> <p>With regard to Policy DM 38 A (e), the Council considers that separation of commercial and non-commercial uses is necessary to ensure the protection of amenity for all site uses and occupants, as well as to ensure that the integrity of the site for employment generating uses is not compromised. No change.</p> <p>In response to comments on telecommunications, a minor modification is proposed so that Policy DM 38 A (g) will read:</p> <p>g) <u>Be designed to enable connection to ultra fast broadband.</u></p>
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					<p>should ensure that the employment function of the site and nearby employment sites are not undermined.</p> <p>The NPPF requires Local Planning Authorities to support the expansion of electronic communications network including high speed broadband. However, it is not expressed as a requirement for developers to provide high speed broadband from development proposals. Whether development can be connected to high speed broadband will depend on the availability of broadband infrastructure. As such, this should not be expressed as a requirement for development proposals to enable connection to high speed broadband.</p>		
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Respondent 17: Barton Willmore on behalf of Workspace

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RDM83	DM 3	Not Stated	Not Stated	This policy seeks to deliver high quality public realm that is appropriately managed and maintained. Whilst this aspiration is supported, the policy as drafted requires the provision of public art and public access to open spaces within a development and their	In light of paragraph 173, we consider that the policy should be reworded to acknowledge that the provision, management and maintenance of public art and public access to spaces will be considered in the context of	Disagree. The policy seeks to ensure that appropriate consideration is given to the management and maintenance of public art and privately owned public spaces within developments. This is unlike to involve a development cost, as such

					<p>long-term retention, management and maintenance. This would be a notable cost that could impact on development viability.</p> <p>NPPF paragraph 173 states that developments ‘should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened’.</p>	<p>development viability and balanced against other priorities such as key infrastructure.</p>	<p>costs would typically fall to occupiers of the development through, for example, the body corporation fees or rents. However, such maintenance costs could be minimised through appropriate design and materials, as well as suitable management arrangements.</p> <p>No change</p>
17	RDM84	DM 6	Not Stated	Not Stated	<p>Policy DM6 seeks to deliver the Council’s objectives for ‘tall’ and ‘taller’ buildings.</p> <p>Workspace welcomes the identification of Wood Green as an appropriate location for tall buildings and the helpful definition of ‘tall’ and ‘taller’ buildings (paragraph 2.39). Furthermore, Workspace supports the detail of the draft policy in respect of tall buildings being ‘a wayfinder or marker’ (C.a.i) and considers that it would be appropriate to also add public spaces/ urban squares in to the wording.</p> <p>There are, however two elements of the draft policy to which Workspace objects:</p>	<p>Workspace supports the detail of the draft policy in respect of tall buildings being ‘a wayfinder or marker’ (C.a.i) and considers that it would be appropriate to also add public spaces/ urban squares in to the wording.</p> <p>In our view, requiring community benefits is inappropriate and unreasonable in the context of tall and taller buildings and should be deleted from the policy.</p>	<p>For suggested change on (C.a.i) the Council disagrees as tall buildings often necessarily need to ‘land’ within a generous public spaces or urban square to provide a more human scale at ground level and to reduce the feeling of dominance and enclosure. The provision of such mitigation can therefore not be considered to justify the tall building.</p> <p>As set out at paragraph 2.40, taller buildings can be prominent and visual features which affect everyone. While good design will ensure these buildings are visually attractive, this is a requirement of all development and, therefore,</p>

				<p>Part B of the draft policy states that taller buildings (and as required by Part C, tall buildings) ‘must be justified in community benefit as well as urban design terms’. If a tall or taller building is acceptable in urban design terms there should be no need to mitigate its impact by demonstrating community benefits or through other means. In heritage terms, the NPPF requires public benefits to be demonstrated if harm is being caused to the significance of a heritage asset (see paragraphs 133 and 134). However, draft Policy DM6 is not specifically concerned with the impact of tall and taller buildings on heritage assets. As drafted, Policy DM6 appears to presuppose that harm will result from the provision of tall or taller buildings. This approach does not result in a positively prepared, forward thinking policy that encourages development and the optimisation of sites to deliver the growth envisaged by the development plan as a whole. In our view, requiring community benefits is inappropriate and unreasonable in the context of</p>	<p>further mitigation is required to justify their need.</p> <p>3D digital modelling is now common practice, and costs are reasonable and considered proportionate to the impacts of tall and taller buildings. Further, the Council has invested in a 3D model for its Growth Areas, which reduces the burden to be placed on applicants promoting tall or taller buildings. This is essential as it enables consideration of the proposal in the context of the spatial development planned for the surrounding area, so will not just consider the context of the building in-situ but in the likely future context of the entire growth area.</p> <p>No change</p>
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					<p>tall and taller buildings and should be deleted from the policy.</p> <p>Part E requires the submission of a digital 3D model for all proposals for taller or tall buildings. Paragraph 193 of the NPPF states that local authorities ‘should only request supporting information that is relevant, necessary and material to the application in question’. Whilst we appreciate that sufficient information would need to be submitted in respect of tall and taller buildings to allow a full and thorough assessment of impact, we consider that it is unreasonable to policy to prescribe the exact nature of such information. 3D images of tall and taller buildings taken from agreed viewpoints is often sufficient to determine the acceptability of building.</p> <p>Requiring a digital 3D model would add to the financial burden of an application in direct conflict with national planning policy.</p>		
17	RDM85	DM 11	Not Stated	Not Stated	Policy DM11 aspires for a mix of housing in new developments having regard to a range of	It should be reworded to clarify that, in line with the NPPF, market demand will	Disagree. The Plan as a whole seeks to meet local housing needs and to deliver

					<p>factors which are supported. Part C of the draft policy seeks to prevent an overconcentration of smaller units (i.e. one and two-bed units) unless part of larger developments or in areas where there is a predominance of larger units. In line with the NPPF, local authorities should plan for a mix of housing based on 'current and future demographic trends, market trends and the needs of different groups' (paragraph 50). Whilst demographic trends may indicate need for units with three bedrooms or more, demand for these is likely to exist in certain areas within the borough and may not correspond to market trends. As worded, we consider the policy to be overly restrictive and not sufficiently flexible to respond to changing market demand. It should be reworded to clarify that, in line with the NPPF, market demand will also be taken in to consideration when determining appropriate housing mix.</p>	<p>also be taken in to consideration when determining appropriate housing mix.</p>	<p>balanced and sustainable communities. Market demand should conform to the former and help deliver the latter but where market demand is at odds with meeting these strategic objectives, it is likely to result in harmful impacts.</p> <p>No change</p>
17	RDM86	DM 13	Not Stated	Not Stated	<p>Policy DM13 considers Affordable Housing provision. It is of note that Haringey is socially and economically</p>	<p>Not specifically stated</p>	<p>DM13 must necessarily reflect current national and regional policies on affordable housing, and</p>

				<p>polarised with high levels of deprivation in certain parts and extreme affluence in others. As expected, the majority of social rented accommodation is heavily concentrated in the poorer areas to the east of the borough. On this basis it is crucial that proposed policy wording makes it clear of the basis on which affordable housing provision will be negotiated. Whilst the policy should refer to viability appraisals and include details of other factors that may influence provision, we note that the pre submission version now specifies the approach of viability assessments (existing/ alternative use value). Furthermore, the level and type of affordable housing should be considered in the context of the availability of grant and the level of developer contributions for on and off-site infrastructure works.</p> <p>LBH must take account of the ever changing backdrop to affordable housing. Indeed at the time of writing the Housing and Infrastructure Bill is due to be heard for a second time and</p>		<p>should not pre-determine what might come out of draft Bills.</p> <p>The Council's policy on affordable housing has been informed by viability appraisal testing and has regard to geographic variations by altering the tenure mix in Tottenham through the Tottenham AAP.</p> <p>DM13A(e) includes public subsidy. However, standard viability appraisals include exceptional site costs and grant assumptions. It is therefore not necessary to include all variable in the policy as they will be relevant or not to the negotiation of affordable housing provision depending on site circumstances.</p> <p>No change</p>
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					could become law later this summer. The requirement for starter homes and other forms of tenure must further be explored before LBH crystallise policy DM13.		
17	RDM87	DM 22	Not Stated	Not Stated	It is accepted that developments should seek to connect to existing decentralised energy networks but only where feasible and financially viable to do so (C.d). The inclusion of this provision is welcome and allows for flexibility in the event that there are physical or other reasons why connection is not possible. In our view, it is not appropriate for the policy to require developments within 500 metres of a planned network to secure connection. Delays with the delivery of a planned network could significantly impact on the delivery of development reliant on connection to the network which would be unreasonable and could undermine the growth strategy of the development plan as a whole.	Not specifically stated.	The Council considers that the policy is sufficiently flexible to enable development proposals to come forward, having regard to individual site circumstances, including certainty of delivery of the planned future DE network. Paragraph 4.48 provides further details in this regard. No change
17	RDM88	DM 38	Not Stated	Not Stated	Workspace supports the general approach to this draft policy, but has concerns with the provision of capped	Not specifically stated	The policy does not impose capped commercial rents as implied, rather the policy supports flexible use of

					commercial rents both in policy SA19 (separate representation) and DM38. There is no supporting evidence looking at viability and we consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce. It is noted that draft Policy DM38(c) (iv) gives consideration to viability when determining affordable rents. Workspace requests that at a minimum viability matters should be expressly noted in the site allocation. If LBH seek to minimise rental income, this will be to the detriment of the type employment space that Workspace deliver and would create unnecessary uncertainty.		existing employment buildings and new forms of employment development to meet the needs of occupiers who require different types of workspace, including affordable workspace. Council's viability work in support of its CIL charging schedule shows that commercial rents in the borough are not sufficient to support new build commercial floorspace. The Workspace Viability Study highlights that new businesses are attracted to the borough's affordable workspace provision. The purpose of the DM38Ac(iv) is to ensure affordable workspace can be considered as part of demonstrating improvements in a site's suitability for continued employment and business use. No change
17	RDM89	DM 48	Not Stated	Not Stated	Whilst supporting paragraph 7.7 acknowledges that development viability may result in reduced financial contributions to allow a scheme to be delivered, this is not	Not specifically stated	The application of the Local Plan policies on development viability has been tested and the policies amended where necessary (e.g. through the reduction of the affordable

				<p>expressly provided for the draft policy. The viability of a development is key to its delivery. If the weight of financial burden is such that a developer will not secure competitive returns on a development that development will not come forward. NPPF paragraph 173 specifically states that developments 'should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened'. The policy should be reworded to make specific reference to development viability. Moreover, development viability may not allow for financial contributions to all items listed in the draft policy (including affordable housing, infrastructure and employment contributions). It should therefore be clarified that the Council will identify the priorities in respect of each site and should seek contributions accordingly.</p> <p>The Council has an adopted CIL Charging Schedule. It will be essential to ensure that policy DM48 works effectively with the</p>		<p>housing target from 50% to 40%). Development is expected to meet the revised policy requirements, and therein, such obligations as necessary to make the development acceptable in planning terms. Without meeting the obligations the proposed development should be refused. Developers are therefore expected to take into account the costs of policy compliance, including infrastructure requirements & affordable housing, into account in their negotiation of land deals. Viability concerns should therefore be an exception, based on exceptional site circumstances, and where such is demonstrated, it remains for the planning authority to determine the balance of obligations to be secured, having regard to sustainability and site circumstances.</p> <p>The Regulation 123 list ensures 'double charging' does not occur.</p>
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					local CIL and that 'double charging' does not occur and an unreasonable financial burden is not placed on developments.		No change
17	RDM90	DM 55	Not Stated	Not Stated	Workspace acknowledges the benefit of masterplanning in some instances and agrees with the draft wording of Policy DM55 which requires masterplans 'if appropriate' . Masterplans are a useful tool in demonstrating how a development on an area of land can be delivered without fettering or prejudicing future delivery of development on adjoining land. Such masterplans should not be approved as part of a development but used as background information in the Council's decision-making process .	Not stated.	The Council considers the requirement for site masterplanning provides certainty that individual site development proposals will not prejudice each other or the wider development aspirations of the Borough. The Council considers this policy is necessary to ensure delivery of the spatial strategy, and is therefore effective in line with national policy. The Council expects planning applications to come forward in line with the agreed wider masterplan. No change
17	RDM91	DM 56	Not Stated	Not Stated	Workspace support the provision of this policy and the council's aspiration to achieve comprehensive redevelopment through compulsory purchase powers where necessary .	Not stated	Support it noted.

Respondent 18: Chris Thomas Ltd obo British Sign and Graphics Association

ID	Rep ID	Policy / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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18	RDM92	DM 3 (C) DM 8 (B)	Yes	Not Stated	<p>The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).</p> <p>We commented on earlier drafts of this document in May 2010, March 2013 and February 2015. We are pleased that most of our comments have been taken into account in the production of this latest draft.</p> <p>We consider Policy DM3(C) to be sound. We also consider Policy DM8(B) to be sound.</p>	Not stated	Confirmation that the respondent considers the policies to be sound is welcomed.
18	RDM93	DM 8 Para 2.51	Not stated	Not stated	<p>We have minor reservations about two points in the supporting text. In paragraph 2.51, it is stated that “internally illuminated box fascias” detract from the appearance of the streetscape. This partly contradicts Policy DM8(B) which states that the Council will grant consent for “illuminated fascia signs”. Many modern internally illuminated</p>	<p>We therefore suggest that in paragraph 2.51 after ‘poor quality materials,’ be inserted ‘bulky and crudely attached, fully’.</p>	<p>Agreed. The Council generally considers that internally illuminated box fascias are not appropriate, however it is recognised that the supporting text can be amended to provide greater flexibility for considering proposals on a case by case basis. The suggested</p>

					<p>fascia signs (which necessarily must be in a “box” of some sort, even if individual letters or halo illuminated) are slimline. Many are designed so as to illuminate only the letters/logo. They can be wholly successfully installed on appropriate shopfronts. We think that the advice is intended to discourage older types of bulky, fully internally illuminated signs which may be crudely attached over an existing fascia. We think that the text should make this clear. We therefore suggest that in paragraph 2.51 after ‘poor quality materials,’ be inserted ‘bulky and crudely attached, fully’.</p>		<p>changes will be included in a schedule of proposed minor modifications.</p>
18	RDM94	DM 8 Para 2.53	Not stated	Not stated	<p>In paragraph 2.53, “brightly illuminated” shop fascias are discouraged. There is nothing wrong with a “bright” fascia in the appropriate location. What is not acceptable is an <u>excessively</u> bright fascia which will stand out in the street to the detriment of the overall area. We therefore suggest that, in the first sentence of paragraph 2.53, “brightly” be deleted and replaced with “excessively bright”.</p>	<p>We therefore suggest that, in the first sentence of paragraph 2.53, “brightly” be deleted and replaced with “excessively bright”.</p>	<p>Agreed. The suggested changes will be included in a schedule of proposed minor modifications.</p>

Respondent 19: Alexandra Park and Palace Conservation Area Advisory Committee

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
19	RDM95	DM 5	No	Not Stated	The APPCAAC welcomes the	The APPCAAC	As set out at 2.35, specific

					recognition given to the significance of viewing corridors and locally important views. However, there is an omission with regard to the need to protect views within and from conservation areas	recommends an additional point E under Policy DM5 to show: “The Council will protect Views into, within and from Conservation Areas”	views from within or to conservations areas are identified in the Conservation Area Appraisals and Management Plans. These identified views are not protected Locally Significant Views but are a material consideration where a development proposal may affect the identified view. No change.
19	RDM96	DM 5	No	Not Stated	We also note that the Map 2.3 on page 16 showing Locally Significant Views is deficient and needs to be augmented. Similarly, in the Site Allocations Development Plan, Table 5: Local Views on page 162 needs to be augmented. The APPCAAC has already made recommendations on this, which seem not to have been taken into account	Augment Map and Table as recommended.	It is recognised that the map is unclear and not aligned with the schedule of views in Table 5 of the Site Allocations and Appendix A of DM DPD. This will be amended for clarity and accuracy. However, in line with Council’s response above the map , nor corresponding schedules will not be amended to incorporate all views into, within and from CAs. No change

Respondent 20: Quod obo Muse Developments and the Canal and River Trust

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
20	RDM97	DM 5	No	Not	The criteria under parts A (a-c)	The wording under	The Council considers the

				Stated	<p>within Policy DM5 are too onerous and thus are not effective considered against other development plan policies, failing this soundness test.</p> <p>Furthermore, part A(c) requires proposals to meet the requirements of the Council’s Tall Buildings and Views Supplementary Planning Document (SPD), which does not yet exist. As such it is difficult to assess the appropriateness of this requirement and therefore is not based on robust evidence, failing the ‘justified’ policy test.</p> <p>Please refer to the accompanying cover letter (part (d) (i)).</p>	<p>criteria A (a-c) of Policy DM5 should be reworded or removed in order to be considered effective.</p> <p>It may also be more appropriate for proposals to demonstrate how development proposals have been informed by that future SPD, rather than slavishly meet the requirements of a supplementary planning document.</p>	<p>wording at DM5A(a-c) to be effective and not onerous, and notes that no detailed evidence has been provided to challenge this assertion. While provision is made for more intensive development within Growth Area, development proposals within Growth Areas should still take account of protected views. There is not considered to be a policy conflict.</p> <p>No change</p> <p>Agreed. A minor amendment is proposed to DM6C(c) to delete the wording ‘Be consistent with’ and replace this with ‘Have regard to’.</p>
20	RDM98	DM 13	Not Stated	Not Stated	<p>Policy DM13 should make clear that Part A (a-g) is not set out in any particular order or level of hierarchy to ensure that equal weight is given to each component part of the Policy.</p> <p>Please refer to the accompanying cover letter (part (d) (ii)).</p>	<p>Policy DM13 should make clear that Part A (a-g) is not set out in any particular order or level of hierarchy to ensure that equal weight is given to each component part of the Policy.</p>	<p>This is not considered necessary as none of the criteria imply an order or hierarchy unless specifically stated so in the policy.</p> <p>No change</p>
20	RDM99	DM 20	No	Not Stated	<p>Policy DM Part F requires that “development adjacent to open space should seek to protect and enhance the value and visual character of the open land”.</p>	<p>Alter wording so that only development proposals that comprise existing ‘green space’ should respond to the visual</p>	<p>Disagree. Development adjacent to green spaces can impact on the use, enjoyment, and visual character of an open space, through impacts such as shadowing and dominance,</p>

					<p>Figure 4.1 identifies The Paddock, located to the east of the site, as 'green space'.</p> <p>Similar to our comments regarding policy TH9 relating to the Green Belt, only development proposals that comprise existing 'green space' should respond to the visual character of that open land.</p> <p>Please refer to the accompanying cover letter (part (d) (iii)).</p>	<p>character of that open land.</p>	<p>for example. These are important public spaces that are to provide relief from the surrounding urban built up environment. In accordance with DM1, new developments need to have regard to their surroundings and should therefore address open space much as they do the street, by ensuring proposals not impact its character.</p> <p>No change</p>
20	RDM100	DM 38	Not Stated	Not Stated	<p>The maximum amount of employment floorspace (based on scheme viability) should not undermine the ability to ensure the successful occupation of that floorspace.</p> <p>Please refer to the accompanying cover letter (part (d) (iv)).</p>	<p>Not specifically stated</p>	<p>Disagree. The Council considers that ensuring occupation of employment floorspace is as much to do with providing the right type and layout, rather than quantum. The Employment Land Review clearly demonstrates demand for additional employment floorspace provision and the Workspace Viability Study sets out how appropriate workspace provision can be achieved.</p> <p>No change</p>
20	RDM101	Not stated	Not Stated	Not Stated	<p>Muse Developments and the CRT welcome the generally positive approach taken in the Development Management DPD</p>	<p>Not specifically stated</p>	<p>The Council does not consider there to be conflicts between the DPD policies. Where several designations apply to a</p>

					<p>which further identifies the site in a Tall Building Growth Area.</p> <p>It is important however that policies within the Development Management DPD does not conflict with other Development Plan Documents and Area Action Plans.</p>		<p>development site, applicants will need to demonstrate how their urban design strategy has sought to address these, consistent with a design-led approach.</p> <p>No change</p>
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Respondent 21: CGMS obo Parkstock Ltd

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
21	RDM102	DM 40	No	Yes	<p>Policy DM40 A Part b: The suggested criteria against which the loss of employment floorspace will be considered includes documented evidence of an unsuccessful marketing campaign over a period of 3 years.</p> <p>It is considered that a marketing period of 3 years is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. A blanket marketing period of 3 years before alternative uses are permitted will go further to hamper development.</p> <p>The policy is therefore not effective.</p>	<p>It is recommended that the policy is revised to allow marketing requirements to be agreed with the Council on a site by site basis once the nature of the site and specific issues are fully understood during pre-application discussions.</p>	<p>The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not</p>

							unreasonably protected for employment generating uses where there is no demonstrable demand for that use. No change.
21	RDM103	DM 55	No	Yes	<p>DM55 requires a masterplan to be prepared for the wider area and beyond to accompany development proposals for allocated sites. This would need to involve engagement with other landowners and occupiers of other parts of the allocated site.</p> <p>Whilst we can understand the benefits of a masterplan approach, demonstrating how individual submissions would not compromise future proposals and involving engagement with adjoining owners where possible, the Council should take a pragmatic approach to engagement with neighbours on a site by site basis.</p> <p>There may be circumstances where adjoining landowners are unwilling to engage or discuss proposals and such situations should not delay or hamper development proposals unnecessarily.</p> <p>The policy as currently worded is therefore not effective.</p>	<p>The supporting text should explain that the level of engagement with neighbouring landowners should be proportionate to the proposed scheme, and if an applicant has taken on reasonable endeavours to engage with other landowners who are not forthcoming then the Council will not allow this to delay or hamper development proposals unnecessarily.</p>	<p>The Council considers Part B of the Policy to be sufficient without the suggested caveat, noting that any subsequent planning application would be subject to notification to all affected parties.</p> <p>No change</p>

21	RDM104	Figure 2.1 DM 5	No	Yes	<p>We note that Figure 2.1 should be read in conjunction with Appendix A (Schedule of Locally Significant Views). However, the numbers referencing the views on Figure 2.1 do not completely correspond with the views numbered and listed in Appendix A. This is confusing and not effective.</p>	<p>The views within Figure 2.2 and Appendix A should be referenced correctly so that they align and the plan is effective.</p>	<p>Noted. It is recognised that the map is unclear and not aligned with the schedule of views. A minor modification is proposed to amend the figure for clarity and accuracy.</p>
21	RDM105	Figure 2.2 DM 6	No	Yes	<p>Policy DM6 Part C</p> <p>Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – 271 Seven Sister’s Road located within Finsbury Park. This site falls within allocation SA36: Finsbury Park Bowling Alley within the Site Allocations DPD.</p> <p>Policy DM6 Part C notes that tall buildings will only be acceptable within areas identified on Figure 2.2 as being suitable for tall buildings. Allocated site SA36 is not shown as a potential location appropriate for tall buildings on Figure 2.2.</p> <p>The text associated with SA36 within the Site Allocations DPD notes that “Taller buildings will be permitted on either side of the new entrance which will help mark Finsbury Park as a destination. This site may be suitable for a tall building if designed in accordance with DM6.” It goes onto</p>	<p>Figure 2.2 should be amended to show SA36 as a potential location for tall buildings to ensure consistency between documents and the delivery of an effective plan, based on the evidence base.</p>	<p>It is recognised that Figure 2.2 is inaccurate and does not reflect the most up to date evidence contained in the ‘Potential Tall Buildings Locations Validations Study’ (Nov 2015). This map will be amended to show two additional locations potentially suitable for tall buildings. Including southern end of Finsbury Park and the site on the corner of Seven Sisters Road and Tottenham High Road. In addition, to reflect this updated evidence the fifth bullet point in the site requirements of SA36 should be amended to remove the first sentence.</p>

				<p>state that “Regarding height, the design needs to be carefully justified and designed to demonstrate an acceptable relationship with the retained pub buildings opposite and the buildings across the road, but this site could potentially be suitable for a tall building.”</p> <p>SA36 makes it very clear that the site is potentially suitable for a tall building.</p> <p>Consideration has also been given to the Council’s evidence base and specifically SLR’s Potential Tall Buildings Locations Validations Study (November 2015). In line with SA36, this Study concludes that “there is potential for tall buildings to provide a land-marking role for the town centre, as well as identifying the locations for the station and / or access to Finsbury Park.”</p> <p>In addition, the Council’s Urban Character Study (February 2015), which also forms part of the evidence base, notes that SA36 could again be suitable for taller, high rise buildings</p> <p>We are therefore unclear why SA36 is not shown on Development Management DPD Figure 2.2 which shows potential locations for tall</p>		
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					<p>buildings.</p> <p>There is therefore a clear discrepancy and inaccuracy between the Site Allocations DPD SA36 and Figure 2.2 within the Development Management DPD. In addition, Figure 2.2 as currently drafted is not justified as it does not align with the Council's evidence base in relation to the potential locations for tall buildings.</p>		
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Respondent 22: Quod on behalf of St. William

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RDM106	DM 5 & Appendix A	Not Stated	Not Stated	<p>Policy DM5: Locally Significant Views and Vistas illustrated by Figure 2.1 Haringey Views (as below) and Appendix A Table 2 Schedule of Locally Significant Views seeks protection of local views across the borough. The basis of these views arises from the 1998 UDP and 2014 Urban Characterisation Study (assumed to be the 2015 Study).</p> <p>Figure 2.1 does not corresponded to the indexation of Appendix A and should be rectified, moreover, the viewpoints are not clearly cross referenced with the Urban Character Study (UCS) (2015) and the Tall Buildings Locations Validation Study</p>	Not specifically stated	<p>It is recognised that the map is unclear and not aligned with the schedule of views in Table 5 of the Site Allocations and Appendix A of DM DPD. A minor modification is proposed to amend Figure 2.1 for clarity and accuracy.</p> <p>An additional map will also be included showing the relationship between the significant views and tall building locations. This will aid assessment of proposals for tall buildings and will form part of the Tall Buildings and Views SPD.</p>

				<p>(2015) to define the relevance and weighting of the viewpoints which should be addressed.</p> <p>We are concerned that the requirements of the policy may result in inevitable conflict with the development plan policy objectives for the Growth Area and therefore may not be technically 'effective'. As currently drafted the policy may fail for Wood Green.</p> <p>Haringey Council are planning to support a minimum of 6,000 new homes in Wood Green and a significant increase in employment generating floorspace. Clarendon Gas Works has permission for tall buildings, is part of the tall buildings cluster at the junction of Western and Coburg Roads, and lies adjacent to current tall building allocations. The Issue and Options Wood Green AAP confirms that "The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device".</p> <p>This approach needs to be balanced with the converging Locally Significant Linear Views (No.19, 20, 21, and 22) which cross the Wood Green Growth Area and Wood Green & Haringey Tall</p>		
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				<p>Building Area to Alexandra Palace. The Potential Tall Buildings Validation Study 2015 recognises that “There is potential for any development of tall buildings at this location (Wood Green and Heartlands) to be visible from several sensitive receptors, which will need to be considered in further detail”. The Study also refers to a “height limit” within the Growth Area, which St William has concerns about, albeit the report does not recommend what this might be, or how it might be assessed. We would be concerned if proposed height limitations arose out of non-development plan documents.</p> <p>Policy DM5 (Part A (a-c)) requires proposals in the viewing corridors of the Locally Significant Views to demonstrate how the proposal enhances the viewers’ ability to recognise and appreciate the landmark being viewed; makes a positive contribution to the composition of the local view; and meet the requirement of the Council’s Tall Buildings and Views Supplementary Planning Document (which does not yet exist). It is considered that requirements (a-c) are too onerous for key development sites in Wood Green and will not be effective, considering other development plan policies which promote development within these viewing corridors. We do</p>		
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					not consider this wording to be effective, and it should be removed or reworded.		
22	RDM107	DM 6	Not Stated	Not Stated	For the reasons explained for Policy DM5, we have concerns regarding Part B(b) of this policy. Part C(c) of the Policy also refers to Council’s Tall Buildings and Views Supplementary Planning Document which has not yet been issued for comment and therefore it is inappropriate to consider it formally within this consultation as we cannot comment on its acceptability.	Not specifically stated	The Tall Buildings and Views SPD will provide further guidance on the interpretation of these key policies, and will go through a separate consultation process at a later stage. However, a minor modification is proposed to DM6A(c) to delete the wording ‘Be consistent with’ and replace this with ‘Have regard to’
T22	RDM108	DM 11	Not Stated	Not Stated	Part A (a) of the policy should include reference to the viability of the development in accordance with the NPPF and NPPG. Part A (b) requires the target mix for affordable housing, in accordance with Policies SP2 and DM13, and the Council’s Housing Strategy which itself is in draft and has been out to consultation. Part B confirms that “The Council will apply the London Plan policies on residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-	Not specifically stated	Disagree. The issue of viability is clearly stated in SP2 (5), to which DM11 A(b) refers. The Council’s Housing Strategy sets out the Council vision, objectives and principles for housing in the borough. The draft status of the Housing Strategy does not affect the bringing forward of this policy. The assessment of townscape character within the Haringey Urban Characterisation Study (2015) takes account of a wider area, and may therefore not be specific to an individual site but

					<p>led approach (see Policies DM1 and DM2), also having regard to the findings of the Haringey Urban Characterisation Study (2015)".</p> <p>We consider the first component of Part B to be unnecessary owing to Policy SP2, and do not consider that the Haringey Urban Characterisation Study should inform "the optimum housing potential of a site". Page 156 of the 2015 Urban Character Study Building Height Recommendations suggests, for example, buildings heights of 3 to 6 storeys across the Clarendon Gas Works site. This despite it being an allocated Central site for Density Purposes (see page 240 of the 2015 Urban Character Study); the majority of the rest of the Borough being an urban, suburban or greenfield location; and the growth requirements of the London Plan. 3 to 6 storeys would be an underutilisation of this site, and in any event would not reflect the extant planning permission which is principally for 7 to 9 storeys. We consider that Part B should be deleted.</p>		<p>is representative of the surrounding context.</p> <p>No change</p>
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Respondent 23: CGMS on behalf of Provewell

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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23	RDM109	DM 39	Not stated	Not stated	<p>ProveWell support the inclusion of policy promoting Warehouse Living within the Haringey Warehouse District. Whilst ProveWell accept an element of employment floorspace re-provision within the district, it is considered that the wording of the policy is too restrictive. The policy states in C:</p> <p>The preparation of a masterplan will have regard to the following matters:</p> <p>B The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community;</p> <p>C The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b);</p> <p>The policy outlined above seeks to re-introduce employment uses to the site, focussing on the intensification and re-provision of employment floorspace, ProveWell consider that this emphasis is overly restrictive, does not allow for adequate flexibility, and in the case of Arena Design Centre, which as detailed above is no longer desirable to businesses, would inhibit future development opportunities, to the detriment of the existing community and surrounding areas. Employment should be instead measured on density, rather than floorspace; employment re-provision should be met through the number of jobs rather than the amount of floorspace. The current floorspace creates space for 1 job per 45sqm; however</p>	Not stated specifically	<p>Part B seeks to establish the lawful planning uses on the site. If the site benefits from lawful development certificates then this is taken into account in establishing the baseline position. It is also important to bear in mind that the sites are employment land, and therefore the retention of the employment floorspace and its intensification is consistent with this designation. The Council disagrees with the suggestion that the sites are no longer desirable to businesses, as our evidence suggests there are a range of different businesses working out of the Warehouse Living estates and demand being created through inner London provision being effective squeezed out. The policy allows for redevelopment to make these sites more suitable for both business and warehousing living use, and the requirement for a masterplan ensures sufficient flexibility.</p> <p>No change</p>
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					redevelopment of the site will allow for 1 job per 10sqm, thus increasing capacity. Replacement floorspace will be of a far greater quality which would enable an increase in employment densities, and is therefore likely to generate significant employment opportunities from redevelopment proposals.		
23	RDM110	DM 40	Not stated	Not stated	<p>ProveWell consider the requirement to provide 3 years of marketing evidence is overly restrictive.</p> <p>Policy should be more flexible to ensure that employment land continues to meet the demand of the industry, and should market demand change over a period less than 3 years, then policy should be more responsive to this need. The Government favour a flexible response to reallocating redundant employment land, as evidenced by paragraph 22 of the NPPF, and the proposed alterations to the NPPF, which states in paragraph 35 that: <i>a balance needs to be struck between making land available to meet commercial and economic needs, and not reserving land which has little likelihood of being taken up for these uses</i></p>	Not stated specifically	<p>The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use.</p> <p>No change.</p>
23	RDM111	DM 6	Not stated	Not stated	This Policy restricts the development of tall buildings to Tottenham Hale, Northumberland Park, and Woodgreen and Harringey	Not stated specifically	DM6 is clear that a taller building is a building two or three storeys higher than the

				<p>Heartlands, as demonstrated on map 2.2.</p> <p>The Policy allows “proposals for taller buildings that project above the prevailing height of the surrounding area” but defines taller buildings as “those that are two to three storeys higher than the prevailing surrounding building heights”. Provwewell object to this limitation, as allowing for a flexible variation in building heights would enhance the streetscene.</p> <p>It is considered that the Overbury and Eade Road site has the opportunity to deliver a landmark building which would act as a gateway to the Haringey Warehouse District, which would add to the vibrancy of the area, attract businesses and residents alike, and will be intrinsic to the success of the Warehouse District overall. The site allocation SA34: Eade and Overbury Roads earmarks the location of this site on the corner of Seven Sisters Road and Eade Road has the opportunity to become a gateway location to the Warehouse District, yet the restriction of Policy DM6 prevents the opportunity from becoming fully realised. Policy DM6 needs to therefore allow for exceptions, in appropriate locations such as this.</p> <p>The Growing London Report by the Mayor’s Design Advisory Group examined how best to meet London’s housing needs, and suggests that “we have to make better use of the land we have available. We have to develop more</p>		<p>surrounding buildings heights up to a maximum of nine storeys – i.e. below the 10 storey trigger of a ‘tall’ building’. The Council therefore considers the policy to be flexible and appropriate to sites outside of Growth Areas and sites where the principle of a tall building has been agreed. The provision of a tall building on the Overbury and Eade Road site is not supported by evidence and would be considered to be ‘inappropriately’ located given the site and surrounding context.</p> <p>No change.</p>
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				<p>densely, and we need to do so within the context of the existing urban fabric and communities".</p> <p>The PTAL rating for the corner of the site is 5, thus supporting the location for a taller, and higher density development at this part of SA34. Paragraph 65 of the NPPF states that: Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.</p> <p>The London Plan Policy 7.7 supports tall building in locations which improve legibility of an area by emphasising visual significance and contribute towards improving permeability of a site, and significantly contribute towards local regeneration. A tall building on the corner of Eade Road and Seven Sisters Road would therefore accord with this Policy.</p> <p>Historic England's Tall Buildings Guidance Note 4 also highlights the advantages of tall building policies, and also stresses the importance of identifying areas appropriate for tall buildings, and ensuring early development on public consultation.</p> <p>Haringey Council have identified this as a potential location for a gateway building; and DM6 should therefore carry this through to</p>		
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					ensure that this opportunity is maximised. It is considered that this is an ideal location for a taller building, and in light of the above, this policy should not restrict building heights in sustainable locations.		
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Respondent 24: Montagu Evans on behalf of Hale Village Properties

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
24	RDM112	DM 6	No	Not stated	<p>In our opinion the principle of a tall buildings policy is sound as this will ensure that the plan is both justified and effective. The identification of areas (at figure 2.2) within the Borough suitable for tall buildings is also supported as this will ensure that the plan is positively prepared and justified. The Council's preparation of an Urban Characterisation Study constitutes a robust and up to date evidence base and justifies the tall building locations defined at figure 2.2.</p> <p>However, Policy DM6 is very detailed and in our opinion as currently drafted this part of the DPD is unsound as it is not justified or effective. In particular, Part D(a) of the policy, which concerns the canyon effect of proximate tall buildings, is in our opinion not justified and could compromise the effectiveness of the Plan.</p> <p>The term canyon effect is vague and its application subjective. The remained of Policy</p>	In order to make the Plan sound we recommend that Policy DM6 Part D(a) is deleted in its entirety.	<p>Disagree. The canyon effect is a term used widely to describe the impacts of proximate tall buildings on various local conditions to be experienced at ground level, in particular, wind conditions. There is a significant body of evidence of the impact of the canyoning effect from development within central London, which has resulted in acceptable and potentially dangerous conditions for pedestrians and others at street level.</p> <p>No change.</p>

					DM6, combined with other design related policies provide sufficient criteria against which to assess the effects, suitability, appropriateness of tall buildings.		
24	RDM113	DM13	No	Not stated	<p>In our opinion Part D of Policy DM13 is unsound as it is not justified nor consistent with national policy. Part D as currently worded proposes a fix to the valuation methodology and approach to determining land value. In our opinion it is not the purpose of planning policy/or the planning system to be prescriptive concerning particular methods of valuation.</p> <p>The National Planning Policy Guidance (NPPG) at Paragraph 14, Reference ID 10-014-20140306 states:</p> <p>‘Central to the consideration of viability is the assessment of land or site value. The most appropriate way to assess land or site value will vary but there are common principles which should be reflected.</p> <p>In all cases, estimated land or site value should:</p> <ul style="list-style-type: none"> reflect emerging policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge; provide a competitive return to willing developers and land owners (including equity resulting from those building their own homes); and be informed by comparable, market-based evidence wherever possible. Where transacted bids are 	In order to render the Plan sound we recommend that Part D of Policy DM13 is deleted entirely.	<p>In line with the London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land use designation.</p> <p>No change</p>

					significantly above the market norm, they should not be used as part of this exercise. In our opinion Part D of Policy DM13 would preclude the ability to apply alternative means of determining site value and as such is not consistent with national policy. The NPPG very clearly sets out that the most appropriate way assess site or land value will vary. Furthermore, the Council have not provided any evidence which would justify the precise drafting of this part of the policy.		
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Respondent 25: Tony Rybacki

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
25	RDM114	DM9	No	Not Stated	As presently worded, Policy DM9 (Dev Mgt DPD) says the Council will: “give consideration to, and support where appropriate, proposals for the sensitive <i>redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area...</i>” The area was designated a Conservation Area in 1967 because of concerns that it was in danger of overdevelopment. This	b) Para C of DM6 in The Development Management DPD needs to be amended to incorporate the additional second sentence shown in italics below: “C Tall buildings will only be acceptable in areas identified on Figure 2.2 as being suitable for tall buildings. <i>They are considered inappropriate for and will not be allowed within the Highgate Conservation Area.</i>”	Disagree. The Council considers DM6 C appropriate and clear in setting out the appropriate locations for tall buildings. No change. The word ‘detract’ refers to the sites and buildings to be redevelopment, rather than to the potential new

					<p>designation has been successful in preserving the area until recently. With a new planning regime obliged to treat favourably all plans that have not been expressly precluded, it is necessary to rule out inappropriate heights, densities and forms with clearly stated limits in the Local Plan.</p> <p>NPPF Guidance - Local Plans - Preparing a Local Plan (Paragraph: 006):</p> <p><i>“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).</i></p>	<p>c) Para D of DM9 in the Development Management DPD needs to be amended to incorporate the words “do not” into Para D under the heading Conservation areas, so the sentence reads:</p> <p><i>“D Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these do not detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or compliment the special characteristics and significance of the area.”</i> <i>(It would be contrary to the Council’s duties to support proposals that could be said to detract from the character and appearance of the Conservation Area – this is a drafting mistake.)</i></p>	<p>development.</p> <p>No change.</p>
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Respondent 26: GL Hearn Limited obo Capital and Regional Plc

ID	Rep ID	Policy / Para /	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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		Figure					
26	RDM115	DM 11	No	Not Stated	<p>Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.</p> <p>Part C of Policy DM11 indicates that the Council will not support proposals which result in an over concentration of 1 and 2 bed units unless they are part of larger developments or within neighbourhoods where such provision would deliver a better mix of unit sizes which include larger and family units. Part A (a) of the policy states that the suitability of a proposed housing development would be considered, in part, on the basis of 'individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed'. There is an internal conflict between this part of the policy and Part C. The latter appears to apply an absolute requirement which fails to acknowledge that there may be individual site circumstances, as set out in Part A (a) that militate against such an approach.</p>	<p>On the above basis we recommend that part C should be deleted from the policy.</p>	<p>DM 11 A should be considered in its entirety, also taking into account DM 11 A (e) which states that proposals will be considered having regard to the need to achieve mixed and balanced communities. The Council considers that DM 11 C complements DM 11 A on this matter, and provides sufficient flexibility to consider proposals having regard to individual site circumstances.</p> <p>Para 3.11 clearly sets out the purpose of part C.</p> <p>No change.</p>

					Part (A) of the policy sets out the criteria against which development will be considered and in our view provides sufficient guidance for determining planning applications.		
					We therefore consider that part C is neither justified nor effective and unsound on this basis.		

Respondent 27: Hilary Beecroft

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
27	RDM116	Paragraph 1.22 / Paragraph 3.17	Not Stated	Not Stated	Point 1 Paragraph 1.22 States It is intended that the policies contained within this document are to be applied borough-wide unless specified otherwise in an Area Action Plan. However Para 3.17 States that "The Council considers that there are exceptional circumstances for residential extensions in South Tottenham that merit further considerations. Proposals will therefore be expected to have regard to the South Tottenham House Extensions Supplementary Planning Document. Paragraph 3.17 provides for a special treatment of a particular locality and in its operation, special treatment of a particular community, it is therefore in conflict with	Haringey to identify the outcome of all relevant impact assessments on all documents referenced in the plan. Haringey to explain why the South Tottenham House Extensions Supplementary Planning Document applies to the South Tottenham area only and not to the rest of the Borough	<p>Equality Impact Assessments (EqIA) are carried out for all Development Plan Documents, in line with regulations.</p> <p>The EqIA and Health Impact Assessments were integrated into the Sustainability Appraisals for the Local Plan Documents. This is available to view on the Local Plan webpages.</p> <p>An EqIA was also carried out for the original version of the South Tottenham House Extensions SPD. (This can be accessed on the Council's website) The</p>

					<p>paragraph 1.22 and possibly with equalities legislation.</p> <p>Point 2 Impact Assessments: Although the document states that Impact Assessments as described in paragraphs 1.14 to 1.17 have been carried out on the Plan. It appears that documents that have been referenced in the Plan including SPD's may not been subject to impact assessments. Impact assessments should be shown to have been carried out on all documents that form part of or are referenced in the plan</p>		<p>Council considered it appropriate to refer to the original EqIA and the Local Plan Strategic Policies EqIA to support the preparation of the review of the House Extensions SPD. The purpose and role of the SPD is clearly set out in the documents, this can be accessed on the Council's website.</p> <p>No change</p>
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Respondent 28: DP9 on behalf of KA Investments (Safestore Ltd)

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
28	RDM117	DM13	Not Stated	Not Stated	Part B of draft Policy DM13 seeks to apply the affordable housing requirement to, amongst other things, additional residential units that are created through amended applications. The application of this policy is considered to be contrary to the policy purpose for small developers and instead should be applied	The application of this policy is considered to be contrary to the policy purpose for small developers and instead should be applied on a site by site basis, with full consideration given to the sites characteristics and merits of the proposal.	Part B(b) seeks to ensure that, when applicants come back to modify consented development, if the revised scheme includes additional units then the amount of affordable housing is also to be revisited based on the new total housing figure.

					on a site by site basis, with full consideration given to the sites characteristics and merits of the proposal.		No change
28	RDM118	DM40	Not Stated	Not Stated	<p>Policy DM40 seeks to protect all non-designated employment land that does not fall within designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas, in accordance with Local Plan Policy SP8.</p> <p>The current drafting of the policy, when taken as a whole, has the effect of affording the same degree of protection to non-designated employment floorspace and sites as designated employment floorspace and sites.</p> <p>It is not reasonable to seek to provide a blanket protection on all non-designated employment land within the Borough, as this fails to take account of those sites where the loss of an employment use to a more sensitive use is desirable. Further the exception tests are excessively onerous with regard to the requirement for a</p>	<p>The policy needs to be redrafted to provide some exception tests where it would be acceptable to support the loss of non-designated employment land where three years marketing evidence is not possible. Saved UDP Policy EMP4 provides reasonable exception tests that could be added to draft Policy DM40 to this effect. Set out below is suggested wording for policy DM40: The Council will seek to retain in employment use any non-designated employment floorspace and sites and planning permission will only be granted to redevelop or change the use of non-designated employment land and floorspace provided:</p> <p>a) the land or building is no longer suitable for business or industry use on environmental, amenity and transport grounds in the short, medium and long term; and</p>	<p>The Council considers that Policy DM 40 is necessary to meet objectively assessed needs for employment land/floorspace and the Borough's strategic employment target.</p> <p>The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council does not consider 3 years to be excess or within the definition of 'long term protection' given that once lost to non-employment use such sites never return to employment use and</p>

				<p>marketing campaign covering a continuous period of three years in order to justify a change to a non-employment use. This approach is also contrary to the NPPF (paragraph 22), which requires policies to avoid the long term protection of sites allocated for employment use, where there is no reasonable prospect of a site being used for that purpose.</p> <p>Part B of Policy DM40 states that where the Council is satisfied that the loss of non-designated employment land or floorspace is acceptable, it will require new development proposals to apply a sequential approach to delivering an alternative use, prioritising community infrastructure, followed by mixed use development that includes employment generating and/or community uses and lastly residential use. This again is overly onerous and is contrary to the policy aspirations of the NPPF (paragraph 22), as the wording fails to treat proposals for alternative uses on their</p>	<p>b) there is well documented evidence of an unsuccessful marketing/advertisement campaign, including price sought over a period of normally 18 months in areas outside the DEAs, or 3 years within a DEA; or</p> <p>c) the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and result in wider regeneration benefits.</p> <p>Part B of Policy DM40 is unsound and should be removed.</p>	<p>reduce the Borough's economic stock and potential. Further, the Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use.</p> <p>Where a loss of non-designated employment land or floorspace is acceptable, the Council considers that a sequential approach to investigating alternative uses is consistent with the NPPF and appropriate to support delivery of the spatial strategy. Where alternative uses are considered, applicants may use evidence to demonstrate why certain uses are not deliverable (e.g. viability or other site specific circumstances).</p>
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					merits, having no regard to market signals , nor the relative need for different land uses to support sustainable local communities. KA Investments is therefore of the view that this part of the policy is unsound and should be removed.		No change.
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Respondent 29: Anastasia Harrison

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
29	RDM119	DM18	No	Yes	DM18 is a good start given current planning policy on basements. It does, however, not go far enough. As the neighbour of a resident who is requesting planning permission for a basement, I believe the neighbour protections are not sufficient. Enhanced neighbour protections (as laid out in the Neighbourhood	The Highgate Neighbourhood Plan, currently out for consultation, has a detailed Basement policy. This has been well considered and uses best practice from other London boroughs. There are elements within the proposed policy, particularly regarding neighbour protections, that should be added to the DM18 to make it far more robust. In addition there should be additional rules during the construction process, such as requiring the use of equipment that minimises noise and vibration. For reference, the details below come from the Highgate Neighbourhood plan found here: http://www.highgateneighbourhoodforum.org.uk/plan/Basements There is considerable concern in Highgate regarding the effect of proliferation of basement developments. Full consideration should be given to the potential impacts of basement developments at application stage. Any assessment has to be full and informed and should cover: • The effect of	Local policies must be based on local evidence. The Council considers that the policy is sufficiently robust and proportionate to positively manage this type of development. Many of the detailed matters raised can be addressed

				<p>Plan) would, given the lack of specificity within the Party Act to deal with basements, also provide protections over time to those carrying out excavations and additionally provide protections for subsequent owners of both properties.</p>	<p>subterranean development on the structural stability of adjacent properties and associated damage caused. Around 45% of all insurance claims nationwide that involve impact from adjacent basement works relate to failure at design stage; • Irreparable damage to the local water regime both in terms of ground water diversion and surface water flooding. Specific concerns were raised around the effect on a decrease in rainfall catchment for Highgate and Hampstead ponds; • The individual and cumulative impact of developments on the character and biodiversity of gardens and adjacent open spaces, particularly in designated conservation areas and those areas designated Private Open Space adjacent to Metropolitan Open Land (on the Fringes of Hampstead Heath); and • The general loss of amenity to both existing and future residents caused by over development on site. Camden have a comprehensive policy covering basement development in their adopted Core Strategy (DP27). At the time of the production of this Plan, however, Haringey did not have a similarly complete adopted policy. Policy DH5 of this Plan seeks to build on Camden’s current policy and ensure that applications for basement development across the Plan area are considered in a consistent and robust manner. Policy DH5: Basements Applications for basement development will be supported where they provide adequate supporting information and meet the requirements set out within this policy. All proposals of this type will require the following to be considered undertaken and / or provided: 1. Enhanced Basement Impact Assessment (BIA) requirements: i) All applications should be informed by a pre-application BIA questionnaire from neighbours to inform scope of</p>	<p>through the Basement Impact Assessment required of applicants, where appropriate.</p> <p>The Council has a statutory duty to support the Highgate Neighbourhood Forum in the preparation of its Neighbourhood Plan, and is aware of the draft basement policy, which has not yet been subject to independent examination. The NPPF requires that Neighbourhood Plan policies are in conformity with the strategic policies of Haringey’s</p>
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					<p>Site Investigation on development site; and ii) Applicants will be required to sample soil along boundaries with neighbours and to monitor ground water for a minimum of 3 months prior to submission in conjunction with meteorological data to establish a realistic model of existing ground water regime; 2. Protection for Neighbours: i) Notwithstanding existing provisions under the Party Wall Act, that may or may not apply, a Schedule of Condition survey will be required of neighbours' properties up to a distance of twice the depth of the basement from the point of excavation. Costs will be covered by the Applicant. ii) A suitably qualified engineer will be appointed by the applicant to oversee the development of basement proposals on behalf of the affected neighbour(s) from their perspective, beginning with the planning stage right the way through to the construction phase and thereafter up to 5 years after building works have been completed. Costs will be covered by the Applicant. iii) The Applicant must obtain an insurance policy to cover any potential damage arising to neighbouring properties. Alternatively the Applicant can opt to place funds in an Escrow Account to cover any such damage; iv) The applicant must pay a Construction Management Plan (CMP) levy of £2/m³ of excavation volume to be used specifically to repair local roads adjacent to the development site; v) All basements subject of this policy will be designed to a Burland Category of Level 1 as a basic standard and Level 0 where critical above ground structures, such as a swimming pool could be affected; and vi) All BIA issues must be resolved to the satisfaction of the local planning authority prior to determination; and vii) In the interest of openness and transparency Section 106 Agreements may not be used in connection with</p>	<p>Local Plan. No change</p>
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						<p>any basement conditions. Currently all conditions included in S106 Agreements are discharged without involvement/feedback from affected neighbours. 3. Consideration of Construction Impacts on Neighbours: i) Any basement development should comprise of no more than one storey deep; ii) The footprint of any basement should not exceed 35% of the plot area, with this level reduced to 20% where it will be below Private Open Space; iii) A CMP will be required at planning stage to ensure construction noise, vibration and dust are kept to a minimum and HGV/LGV movements do not significantly increase traffic congestion placing unreasonable stress on local residents given works can take up to 2 years to complete; and iv) A Construction Management Strategy (CMS) will be required at planning stage to ensure methods of construction are tenable. 4. Limiting Environmental/ Ecological Impacts: i) The TER score must take into consideration power used for ventilation, A/C, space heating, pumps; and ii) Any basement development must allow for a minimum of one metre of permeable soil above any part of the basement beneath a garden to support biodiversity and larger trees/planting</p>	
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Respondent 30: Peter Mcnaughton

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
30	RDM120	DM 18	No	Not Stated	My comments relate to the lack of a formal basement policy in Haringey. This form of development is becoming	Clauses adopted from planning regulations relating to basements in force in other	Policy DM 18 sets out a policy on residential basement development in Haringey. The Council considers that the

				<p>increasingly popular, and is rapidly spreading in many areas of Highgate; in my own short street there have been four within the recent past and this rate of basement development seems likely to continue. Some councils (e.g. Camden) have implemented a formal policy to control intrusive and damaging development and it is essential that Haringey should do likewise.</p> <p>A formal policy to protect neighbours is particularly important in Highgate, where many properties are terraced and on steep hills. The structural threat to nearby properties is considerable and some control must be exerted on unsuitable developments, which may in extreme cases (not unknown in other parts of London) cause complete collapse of entire houses and significant damage to neighbouring properties.</p>	<p>London councils should be adopted in Haringey. In particular:</p> <ol style="list-style-type: none"> 1. Excessively sized basements should be curbed. Development should be restricted to the original (usually Victorian) footprint and to one floor. 2. The impact on the whole terrace (in the case of terraced houses), and the possible impact of many basement applications within the same terrace, should be considered 3. Applicants should be required to lodge a basement impact assessment (BIA) on application and neighbouring residents should be given the option to challenge it 4. The impact of basement developments on houses on a steep slope, and of subterranean water flows down the slope, should be explicitly 	<p>policy is sufficiently robust and proportionate to positively manage this type of development, including consideration of impact on amenity, local character, structural stability of adjoining properties and flood risk. Basement Impact Assessments will be required, where appropriate as provided in paragraphs 3.43 and 3.44. The suggested criterion (7.) is not considered to be consistent with NPPF paragraph 193.</p> <p>With regard to the limit on size and storeys of basement proposals, there is currently no local evidence to support a restriction on size. Even in Westminster, the policy limits basements to a single storey 'in most instances' and is therefore not an absolute. In effect, it is for the applicant to demonstrate a genuine need for the size of the basement proposed and the ability to manage impacts especially over a longer build out period which should dictate the acceptability of the scheme.</p> <p>No change</p>
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						<p>considered.</p> <p>5. The impact of the development on the townscape and historical character of the area should be considered</p> <p>6. A construction management plan should be required as part of the application in order to minimise disruption to neighbours.</p> <p>7. An application should be required to explain how the benefit to the occupants of a basement conversion outweighs the significant inconvenience to neighbours.</p>	
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Respondent 31: Stephen Robinson

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
31	RDM121	DM 18	No	Not Stated	I think that Haringey Council must have a basement policy- it is essential to ensure that there is appropriate	The residential basement policy needs strengthening. I suggest that the following clauses be added to the policy for residential properties: Many of these clauses have come form	The Council considers that the suggested changes are too onerous and DM18 is considered to be the

				<p>development and that Haringey residents are protected from inappropriate basement development.</p> <p>DB 18 is a reasonable start but it is pretty basic. There are many more policies that need to be added to protect residents from inappropriate basement development and protect them during the construction process.</p> <p>My neighbour made a highly objectionable planning application which included an excessively large basement in a row of terraced houses on a steep slope in Highgate. I was shocked to learn that Haringey did not have a basement policy that was fully in force. This is essential for the Council to have in order to protect</p>	<p>other London Councils such as Camden and Westminster. These clauses are additional to the existing policies set out in DB18</p> <p>a) basement development does not involve the excavation of more than one storey below the lowest original floor level (except in the case of swimming pools) and should be within the existing footprint of the property</p> <p>b) natural ventilation and daylighting should be used where habitable accommodation is being provided and ventilation and lighting should be energy efficient. Note: The existing planning rules habitable accommodation must be applied to basement application. The shortage of land in Haringey must not allow sub-standard living accommodation to be created through basement development</p> <p>c) Given the significant disruption of basement construction on adjoining neighbours, a construction management plan which demonstrates that the applicant will comply with the relevant parts of the Council's Code of Construction Practice and awareness of the need to comply with other public and private law requirements governing development of this kind</p>	<p>most appropriate approach and sufficiently robust to manage basement development.</p> <p>With regard to the limit on size and storeys of basement proposals, there is currently no local evidence to support a restriction on size. Even in Westminster, the policy limits basements to a single storey 'in most instances' and is therefore not an absolute. In effect, it is for the applicant to demonstrate a genuine need for the size of the basement proposed and the ability to manage impacts especially over a longer build out period which should dictate the acceptability of the scheme.</p> <p>No change.</p>
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				<p>Haringey residents from the actions of inconsiderate neighbours. There have been several instances where houses have fallen down due to basements and the impact on adjoining properties, particularly in terraced housing, is enormous.</p> <p>I cannot think of many other areas in London with the distinct topography of Highgate with its steep hills. I appreciate policy has to apply to the borough as a whole, however, the risk of basement development on the steep hills of Highgate (particularly on terraced housing where many other people will be impacted not just the applicant) needs to be addressed by Haringey Council</p>	<p>d) The Council may need a Code of Construction practice for basements, for example to deal with use of noise and vibration reducing equipment during the basement build or restricting the hours of operation of excavating</p> <p>e) a basement extension will not be permitted where the purpose is to create a new dwelling house in the residential property or for the purpose of further sub-dividing the existing residential property. You have to control the use of basements to create new flats or dwelling house.</p> <p>f) where a basement extension is to a terraced property, the impact on the terrace as a whole (not just the adjoining property) needs to be considered to ensure it is stable, particularly if the terrace is on a slope- Note; Highgate has many steep slopes- the impact of building basements, particularly on terraced housing on steep slopes has to be considered and restricted. The Council need to devise an appropriate policy to deal with this issue</p> <p>g) the cumulative impact of a number of basement developments in the same terrace needs to be carefully considered as well.</p>	
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					<p>h) provide a satisfactory landscaping scheme, incorporating soft landscaping, planting and permeable surfacing as appropriate;</p> <p>i) not result in the loss of trees of townscape, ecological or amenity value and, where trees are affected, provide an arboricultural report setting out in particular the steps to be taken to protect existing trees;</p> <p>j) incorporate sustainable urban drainage measures to reduce peak rate of run-off or any other mitigation measures recommended in the structural statement or flood risk assessment;</p> <p>k) protect the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape are sensitively designed and discreetly located;</p> <p>l) protect heritage assets, safeguarding significant archaeological deposits and in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance;</p>	
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Respondent 32: Jenny Willis

ID	Rep ID	Policy /	Soun	Legally	Reason	Change Sought	Council's Comments
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		Para / Figure	d	Compliant			/ Response
32	RDM122	DM18	No	Yes	A basement policy for Haringey is long overdue so Policy DM18 is most welcome and provides good basic protection in standard circumstances for neighbouring residents. However, more needs to be done in respect of proposed developments in rows of terraced houses particularly those on steep slopes with a history of instability, of which there are many examples in Highgate and Muswell Hill.	<p>I suggest the following modifications in respect of terraced housing:</p> <p>The Council will not permit basements within terraces with a known history of subsidence and water ingress.</p> <p>Failing that:</p> <p>Basements within terraces should be restricted to the footprint of the house as originally built.</p> <p>To protect the stability of the terrace as a whole, basements should be formed using internal piled walls (without underpinning) within the load bearing walls. This reduces the likelihood of differential movement problems and allows the terrace to continue to move.</p> <p>If the Council is not minded to implement (c) then:</p> <p>The applicant is required to enter into Party Wall Agreements with the owners of <u>all</u> properties within the terrace to cover potential damage throughout the terrace, which is in effect a single construction.</p>	<p>The Council considers that the suggested changes are too onerous and DM18 is considered to be sufficiently robust to address the issues of subsidence and stability.</p> <p>It should be noted that Part Wall agreements fall outside of planning – being covered by separate legislation.</p> <p>No change.</p>

Respondent 33: Lynne Zilkha

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
33	RDM123	DM18	Not Stated	Not Stated	The Haringey LPA has indicated at Local Plan consultations that it intends to follow the lead as set by other LAs	As stated in blue	Local policies must be based on local evidence. Haringey Council cannot simply apply Kensington and

				<p>namely Kensington & Chelsea. On comparison with K&C basement policy CL7 adopted in January 2015, I welcome the not more than 50% garden rule. However, after comparison, it stops short on several key points. Haringey's DM18 is more generally worded and open to interpretation while K and C's policy is more specific and less open to interpretation.</p> <p>The parts highlighted in yellow below are the elements which differ from Haringey's draft basement policy, my comments are in blue. We ask that Haringey LPA includes these points as they had said they would at planning forums etc.</p> <p>Kensington and Chelsea, Policy CL7, Basements (attached)- The Council will require all basement development to:</p> <p>a) not exceed a maximum of 50% of each garden or open part of the site. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens. Exceptions may be made on large sites;</p> <p>b) not comprise more than one storey. Exceptions may be made on large sites; (comment- Haringey LPA could be more bullish, and confident- why not copy this example to limit the impact of super basements)</p> <p>c) not add further basement floors where</p>	<p>Chelsea's basement policy as the circumstances of the two boroughs are not entirely similar. The Council considers that the suggested changes are too onerous and DM18 is considered to be the most appropriate approach and sufficiently robust to manage basement development proposals within Haringey.</p> <p>No change.</p>
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				<p>there is an extant or implemented planning permission for a basement or one built through the exercise of permitted development rights;</p> <p>d) not cause loss, damage or long term threat to trees of townscape or amenity value;</p> <p>e) comply with the tests in national policy as they relate to the assessment of harm to the significance of heritage assets;</p> <p>f) not involve excavation underneath a listed building (Haringey could be more prescriptive they're policy just refers to the historic environment) (including vaults);</p> <p>g) not introduce light wells and railings (Haringey could extend this definition to include railings or glazed balustrades, the draft policy just refers to lightwells) to the front or side of the property where they would seriously harm the character and appearance of the locality, particularly where they are not an established and positive feature of the local streetscape;</p> <p>h) maintain and take opportunities to improve the character or appearance of the building, garden or wider area, with external elements such as light wells, roof lights, plant and means of escape being sensitively designed and discreetly sited; in the case of light wells and roof lights, also limit the impact of light pollution (Haringey's policy could</p>		
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					<p>refer to light pollution);</p> <p>i) include a sustainable drainage system (SuDS), to be retained thereafter; (perhaps Haringey should also include the provision of SuD's in all basements as best practice)</p> <p>j) include a minimum of one metre of soil above any part of the basement beneath a garden; (Haringey's policy simply refers to 'adequate soil depth' again, why not be precise and actually refer to a minimum depth of 1m?)</p> <p>k) ensure that traffic and construction activity do not cause unacceptable harm to pedestrian, cycle, vehicular and road safety; adversely affect bus or other transport operations (e.g. cycle hire), significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working and visiting nearby;</p> <p>l) ensure that construction impacts such as noise, vibration and dust are kept to acceptable levels for the duration of the works;</p> <p>m) be designed to safeguard the structural stability of the existing building, nearby buildings and other infrastructure including London Underground tunnels and the highway; (Haringey's draft policy does not refer to the underground)</p> <p>n) be protected from sewer flooding through the installation of a suitable pumped device. A specific policy</p>		
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				<p>requirement for basements is also contained in Policy CE2, Flooding. In addition, K & C have a Basements SPD which will provide guidance for the information that will need to be submitted with basement application, including the following:</p> <ul style="list-style-type: none"> - Accompanying (but not part of) a planning application, a construction method statement (CMS) will need to be submitted by an appropriately qualified civil or structural engineer, which will contain a report into the ground and hydrological conditions of the site including groundwater flow and explain how these matters will be dealt with during the construction of the site. The CMS will also demonstrate how the excavation, demolition and construction work (including temporary propping and other temporary works) can be carried out whilst safeguarding structural stability. The structural stability of the development itself is not controlled by planning but through Building Regulations. The Party Wall Act is more suited to dealing with damage related issues. - ways to minimise disturbance be included in the CMS. Detailed matters to include the drilling of boreholes; impact on trees; the sequence of temporary works to minimise the effect on 		
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					<p>neighbours; water flow; the consideration of related cumulative impacts; the link between a basement and the host property and the need for professional verification of certain works. Guidance relating to safeguarding amenity, that is noise, vibration and dust from construction works be included.</p> <p>- a draft construction traffic management plan (CTMP) be required to be submitted with the application and where planning permission is granted, the Council will attach a condition requiring a full CTMP. The CTMP will address issues relating to highway safety, the freeflow of traffic, noise associated with/from construction vehicles and availability of parking. Detailed matters will include vehicle stationing, manoeuvring and routing, parking suspensions and issues in relation to residential and workplace disturbance, arising from vehicle stationing, loading and unloading and movement.</p>		
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Respondent 34: SF Planning on behalf of Jigsaw Student Living Ltd

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
34	RDM124	DM15	Not Stated	Not Stated	- Specialist Housing Accommodation Like many other boroughs, Haringey's Housing Strategy	None Stated	Comments noted.

				<p>confirms the Council are finding it increasingly difficult to secure good quality, sustainable and affordable temporary accommodation of all types in London. Competition for private rented homes has driven up prices, sometimes further fuelled by suppliers who actively inflate the market. Meanwhile, the council is dealing with rising levels of homelessness, with households often spending longer in temporary accommodation.</p> <p>The housing strategy sets out to meet the challenge on demand, and to contain costs, the council are working in different ways and are;</p> <p>“Forging new partnerships with investors offering long-term investment to provide affordable, good quality, secure homes to help homeless households as well as additional, less expensive temporary accommodation. P25 – para.2”</p> <p>Haringey’s emerging policy DM15 relates to “Specialist Housing” and is relevant in this case. The policy sets out the Council will support proposals for new special needs housing where it can be shown that there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey’s Housing Strategy and Older People Strategy.</p> <p>To establish whether there is a local need for specialist accommodation, discussions have been held with Andrew Billany, Managing Director of Homes from Haringey. These discussions have confirmed there is a need for specialist accommodation which is capable of the meeting the needs of the local authorities housing demands Haringey Homes would in principle be willing to enter into a lease agreement to take over the building as a whole.</p> <p>The new building which already has consent and is located within an area with good public transport links, has the potential to provide suitable temporary accommodation and, subject to appropriate management and safeguards for occupiers and neighbouring residents, will help to integrate</p>		
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					vulnerable people, and special needs groups into the community.		
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Respondent 35: Sport England

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
35	RDM125	Policy DM26 Para A.	Yes	Not stated	<p>Sport England supports the strengthened wording that recognises the loss of open space as acceptable, where evidence shows that the open space is surplus to requirements.</p> <p>It is understood that Haringey is undertaking a Playing Pitch Strategy in liaison with Sport England. This work should be allowed to be concluded and the outcomes fed into Policy, making it more robust; linking to the evidence base that sits behind it.</p>	None stated	<p>Support noted.</p> <p>Unfortunately work on the Playing Pitch Strategy has not progressed as rapidly as hoped and should not hold up the adoption of the Local Plan but be included, where appropriate, in any subsequent review, noting that the Strategy itself would be a material consideration where relevant to the determination of a planning application.</p>
35	RDM126	Policy DM20 Para D.	Yes	Not stated	<p>Sport England supports the replacement of 'small-scale' with 'appropriate scale' with reference to ancillary development; which affords more flexibility and ensures support for outdoor sport and recreation provision.</p>	None Stated	Support noted.
35	RDM127	Policy DM20 Para G.	Yes	Not stated	<p>Sport England supports the approach for the provision of publically accessible open space on sites over 1ha for housing, subject to viability. This is under the</p>	Not Specifically stated	Support noted.

					premise that the standards are locally derived and underpinned by the Council's emerging Playing Pitch Strategy.		
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Respondent 36: David Wheatley

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
36	RDM128	DM22	Not stated	Not stated	Finally I am concerned about proposals for a decentralised energy network. The likely outcome of this would be a district heat network, with heat generated by combined heat and power generators, run on gas fuel. Fossil fuel generation causes CO2 emissions and does not align with the UK's objective of reducing CO2 emissions by 80% in 2050. We must have electrically powered homes for heating and small power/lighting so that in the future we can benefit from an electrical supply that is powered by renewable energy. This means we need electrically powered heat pumps (probably air source) to provide heating.	Not specifically stated	DM 22 is supported by national and regional policy. Decentralised Energy is part of a package of measures to deliver more energy efficient development, working towards a low carbon borough, as set out in SP4. No change.

Respondent 37: Muswell Hill & Fortis Green Association

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
37	RDM129	DM33	Not Stated	Not Stated		Proposed Additions (shown in red) : POLICY DM33: CROSSOVERS, VEHICULAR ACCESS AND	The suggested change does not add any benefit to the policy. No change.

						<p>ADOPTING ROADS</p> <p>A The Council will only support a proposal for a crossover or new vehicular access where it is demonstrated that the proposal does not result in:</p> <p>a A reduction in pedestrian or highway safety; or b A reduction of on-street parking capacity within a Controlled Parking Zone; or c A visual intrusion to the street scene.</p> <p>B New access roads to new development will only be adopted where they:</p> <p>a Serve a large number of residential dwellings (generally greater than 200 units); b Form a link to the highway network; and c Form a useful extension to an existing highway.</p>	
37	RDM130	DM34	Not Stated	Not Stated		<p>Proposed Additions (shown in red):</p> <p>POLICY DM34: DRIVEWAYS AND FRONT GARDENS</p> <p>A The Council will only permit parking on front gardens where a minimum of 50% BY AREA[<i>of existing</i>] of the relevant front garden is retained as or made into soft landscaping [area is being retained]. Any hard standing should have drainage provision within the curtilage of the property and reduce flooding</p>	<p>Disagree. The Council considers DM34 to be the most appropriate approach and sufficiently robust to manage driveways and front gardens in relation to flood risk and local character.</p> <p>Conservation area consent no longer exists, it is just planning permission. Proposals affecting Conservations Area will be</p>

						<p>through the use of a permeable paving material.</p> <p>B In a Conservation Area, where demolition of a boundary wall is needed for vehicle access, Conservation Area consent is required for removal of all or any part of a front boundary walls, gate, railing or hedge where any part of the relevant wall, gate railing or hedge exceeds 1metre in height. Conservation Area consent will normally be refused for proposals which fail to preserve or enhance the character or appearance of a Conservation Area as a result of the loss or disruption of these features</p>	<p>assessed against all relevant policies.</p> <p>No change.</p>
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Respondent 38: Crossover Group

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
38	RDM131	DM 33	Not Stated	Not Stated	Not stated	<p>Proposed amendments/ additions marked in red and deletions marked in green – see below:</p> <p>(Council note: For formatting reasons, proposed additions have been made bold and deletions in strikethrough. See original response for colour coding).</p> <p>A The Council will only support a proposal for a crossover or new vehicular access where it is demonstrated that the proposal does not result in:</p>	<p>The suggested change does not add any benefit to the policy.</p> <p>No change.</p>

						<p>a A reduction in pedestrian or highway safety; or b A reduction of on-street parking capacity within a Controlled Parking Zone; or c A visual intrusion to the street scene.</p>	
38	RDM132	DM 34	Not Stated	Not Stated	Not stated	<p>Proposed amendments/ additions marked in red and deletions marked in green – see below:</p> <p>(Council note: For formatting reasons, proposed additions have been made bold and deletions in strikethrough. See original response for colour coding).</p> <p>A The Council will only permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained. Any hard standing should have drainage provision within the curtilage of the property and reduce flooding through the use of a permeable paving material.</p> <p>B In a conservation area, where demolition of a boundary wall is needed for vehicle access, Conservation Area consent is required for removal of all or any part of front boundary walls, gates or railings where any part of these exceeds 1m in height. Conservation Area consent will normally be refused for proposals which fail to preserve or enhance the character or appearance of a conservation area as a result of the loss or disruption of</p>	<p>Disagree. The Council considers DM34 to be the most appropriate approach and sufficiently robust to manage driveways and front gardens in relation to flood risk and local character.</p> <p>Conservation area consent no longer exists, it is just planning permission. Proposals affecting Conservations Area will be assessed against all relevant policies.</p> <p>No change</p>

						these features Footnote 1: The additional paragraph B above (in red) is derived from an accepted and non-controversial part of previous policy SPG1b.	
38	RDM133	DM 33 DM 34	Not Stated	Not Stated	Not stated	Footnote 2: The amendments proposed here are consistent with the submission made by the Hornsey Historical Society to which reference should be made	Noted.

Respondent 39: Hornsey Historical Society

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
39	RDM134	DM 33 DM 34	Not Stated	Not Stated	These two policies are inextricably linked and the provision of car parking space in front gardens of residential properties and part A of Policy DM33 requires further consideration and stronger policies particularly in respect of properties within a Conservation	<p>In most residential areas within CPZs proposals to permit a vehicular access for car parking on a front garden would fail to meet all the tests set out under DM33A. Where there is no CPZ there would be a loss of on street car parking space which in most Haringey streets is at a premium.</p> <p>The reference to visual intrusion does not adequately cover the effects of creating car parking in front gardens which usually involves removing part of the garden wall and the creation of a hard surface. This is only partially dealt with in DM34. It should be made clear that this policy relates to a dwelling house and that permitted development rights do not apply to houses converted into flats.</p> <p>While recognising that the powers of the Council are limited because of permitted development rights we consider that there should be stronger</p>	<p>Disagree. The Council considers DMs 33 and 34 along with DM32 to be the most appropriate approach and sufficiently robust to manage parking and crossovers, and driveways and front gardens in relation to flood risk and local character.</p> <p>Proposals affecting Conservation Area will be assessed against all relevant policies.</p> <p>No change.</p>

					Area.	<p>policies to deal with the effects of car parking in front gardens in Conservation Areas where, in many instances, the provision of a car parking space with the attendant destruction of garden walls detracts from the character and appearance of the area. Ideally the Council would make an Article 4 Direction to make it necessary to obtain permission to demolish any front garden wall in a Conservation Area. As express permission is required if a wall is over 1 metre high this should be made clear in Para. 5.13.</p> <p>Policy DM34 should include a statement that the council will require as much as possible of the existing garden wall to be retained and any additional walls to be erected or replaced to be in keeping with the existing. In addition there should be a requirement that permission will not be granted where the size of the garden is insufficient to reasonably accommodate a vehicle and where the configuration of the site would result in a vehicle manoeuvring in or out of the site in a manner dangerous to road traffic and pedestrians.</p> <p>In DM34 it states that the Council will require a minimum of 50% of existing soft landscaping to be retained whereas Para. 5.13 states “..... will seek the retention of 50% of the garden as soft landscaping..” which is not the same thing. This should be redrafted appropriately.</p>	
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Respondent 40: Colliers on behalf of Diamond Build PLC

ID	Rep ID	Policy	Sound	Legally	Reason	Change Sought	Council's Comments /
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		/ Para / Figure		Compliant			Response
40	RDM135	DM38	Not stated	Not stated	Our client is encouraged by Policy DM38's support for mixed-use development within a defined "Local Employment Area – Regeneration Areas". It goes on to identify additional policy requirements that a scheme must include in order to be considered acceptable. However, our client does not consider Part D, which requires the need to investigate the site's potential to meeting the Borough's identified gypsy and traveller accommodation needs, justified. The main aim of this policy is to maximise the amount of employment accommodation deliverable on a site, through the introduction of a higher value uses such as market residential. The introduction of the need to investigate accommodating gypsy and traveller accommodation would have a similar, if not bigger, impact as having to include affordable housing into a mixed use scheme i.e. the level of deliverable employment floorspace would be significantly reduced. In order for this approach to be considered effective, there is a need to define in the wording of	d investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs ; In order to maximise the amount of employment floorspace to be provided in the mixed use scheme, affordable housing provision will not be required;	Local Plan Policy SP 8 sets out the strategic approach for managing land within Haringey's employment land hierarchy. SP 8 states that LEA – RA designation is the most flexible in the hierarchy, and provides in-principle support for mixed use development. DM 38 gives effect to SP 8, providing further detail on LEA - RA, including where mixed-used proposals are appropriate. The Council considers DM 38 is necessary to ensure delivery of the Borough's spatial strategy. All new residential development, including mixed-use schemes, will be expected to provide a mix of housing in line with DMs10, 11, and 13. As LEA-RA offer flexibility for land uses, the Council considers it appropriate that proposals investigate opportunities for sites to meet identified need for gypsy and

					the policy that the provision of affordable housing would not be required, as the introduction of residential units is only considered acceptable where it seeks to facilitate the maximum provision of employment floorspace including where possible capped rents. We propose the following amendment to Policy DM38(d):		traveller accommodation, where suitable. No change.
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Respondent 41: Knights obo Power Leisure Bookmakers Ltd

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
41	RDM136	DM 42	No	Yes	<p>In our view policy DM42 is not Sound as the policy is no 'justified' as it is 'not using the most appropriate strategy' when considered to the alternatives suggested in the Retail Study. In addition, it is not 'effective' as it is not 'flexible' and it is not 'consistent with National Policy'. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.</p> <p>The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with the guidance set out in the London Plan Town Centres SPG.</p>	The policy should be re-worded, or as a minimum, significantly loosened to allow for health competition between betting shops. A full explanation can be found in our letter of representation that has been submitted alongside this form.	<p>Disagree. DM42 is about maintaining and supporting the role and function of Haringey's higher order town centres and accords with national and regional policy.</p> <p>Betting shops are specifically addressed in DM46.</p> <p>No change</p>

					The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.		
	RDM137	DM 43	No	Yes	<p>In our view policy DM43 is not Sound as the policy is not ‘justified’ as it is ‘not using the most appropriate strategy’ when considered to the alternatives in the Retail Study. In addition, it is not ‘effective’ as it is not ‘flexible’ and it is not ‘consistent with National Policy’. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.</p> <p>The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with the guidance set out in the London Plan Town Centres SPG.</p> <p>The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	The policy should be re-worded, or as a minimum, significantly loosened to allow for health competition between betting shops. A full explanation can be found in our letter of representation that has been submitted alongside this form.	<p>Disagree. DM43 is about maintaining and supporting the role and function of Haringey’s higher order town centres and accords with national and regional policy.</p> <p>Betting shops are specifically addressed in DM46.</p> <p>No change</p>
41	RDM138	DM 46	No	Yes	In our view policy DM46 is not Sound as the policy is not ‘justified’ as it is	The policy should be re-worded, or as a	The Council has reviewed Greenwich

				<p>‘not using the most appropriate strategy’ when considered to the alternatives in the Retail Study. In addition, it is not ‘effective’ as it is not ‘flexible’ and it is not ‘consistent with National Policy’. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.</p> <p>The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with the guidance set out in the London Plan Town Centres SPG.</p> <p>The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>minimum, significantly loosened to allow healthy competition between shops. Greenwich Council’s betting shop policy provides a good example of a ‘model policy’ that is appropriate and compliant with the aspirations of both regions and local policy. The policy states:</p> <p>“When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and the need to avoid over-concentration and saturation of this particular type of use”.</p> <p>We suggest that Haringey consider the points raised within our representation letter and adopt the model</p>	<p>Council’s betting shop policy and considered it ineffective in not providing any certainty as to how the policy may be applied.</p> <p>No change</p>
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						policy text rather than the current text. On adoption of the model policy, we would then consider the Plan 'sound'.	
41	RDM139	Para 6.33 – 6.48 DM 42	No	Yes	<p>In our view some of the paragraphs from 6.33 – 6.48 are not Sound as they are not 'justified' as they do not provide the most appropriate strategy when considered against the alternatives. In addition, they are not considered 'consistent with National Policy (NPPF) or with the London Plan and Town Centres SPG.</p> <p>It is noted within the text (specifically paragraphs 6.35, 6.37, 6.45 and 6.46) that the thresholds set out in policies DM42 and DM43 are supported by the Retail and Town Centres Study (2013) but on review of the document it is unclear how this conclusion was reached. The study actually suggests that although A1 threshold figures can be adopted, it may be appropriate to consider an alternative criteria on a case by case basis.</p> <p>The onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.</p>	Remove the threshold figures from Policy DM42 and DM43 for the reasons set out within our accompanying letter.	<p>Disagree. Policy DM42 and its supporting text seeks to support and maintain the important role and function of Haringey's higher order town centres and accords with national and regional policy.</p> <p>Betting shops are specifically addressed in DM46.</p> <p>No change.</p>

					<p>The text therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>		
41	RDM140	<p>Para 6.54 – 6.57</p> <p>DM 46</p>			<p>In our view paragraphs 6.54 – 6.57 are not Sound as they are not ‘justified’ as they are ‘not based on a robust and credible evidence base’ in the form of the Health Evidence Base. In addition, it is not ‘consistent with National Policy’ (NPPF) or with the London Plan and Town Centres SPG.</p> <p>The onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.</p> <p>The text therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>Reference to the Health Evidence Base should be removed from the supporting text to Policy DM46 as it does not form a credible evidence base. The Health Evidence Base document relates to problem gambling which is a matter already dealt with under the Licensing Act, and contrary to the Council’s statements, the study suggests that there is not enough empirical evidence to support the thresholds that have been formulated for betting shops on the grounds of health concerns.</p> <p>We suggest that Haringey consider the points raised within our</p>	<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting</p>

						<p>representation letter and remove reference to the Health Evidence Base document.</p>	<p>town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot</p>
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							<p>food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change</p>
41	RDM141	General	No	Not stated	We write on behalf of Power Leisure Bookmakers Ltd to make representations to the Haringey Local Plan pre-submission consultation – Development Management DPD (hereafter referred to as the ‘Plan’).	Not stated	Noted. The Council considers the policies of the Local Plan to be in general conformity with the London Plan and based on robust

				<p>Section 19 of the Planning and Compulsory Purchase Act 2004 requires that Development Plan documents or any other local development document must have regard to national policy documents and guidance as in the National Planning Policy Framework ('NPPF'). For reasons set out below, this draft document is plainly contrary to the NPPF.</p> <p>Part 4, Regulation 8 Town and Country Planning (Local Planning) (England) Regulations 2012 prescribes that Local Plans must contain a reasoned justification of the policies. As set out in the National Planning Practice Guidance ('NPPG') (Paragraph 014. Reference ID: 12-014-20140306) “appropriate and proportionate evidence is essential for producing a sound Local Plan” and “evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan”. Paragraph 182 of the NPPF states that a local planning authority ('LPA') should submit a plan for examination which it considers is sound — namely that it is: positively prepared, justified, effective and consistent with national policy. It is considered that the Plan is not justified, as it is not founded on a</p>	<p>evidence. The Mayor for London has also confirmed that the policies are in general conformity with the London Plan.</p> <p>No change</p>
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					<p>robust and credible evidence base and does not offer the most appropriate strategy when considered against alternatives particularly in relation to betting shops.</p> <p>The London Plan forms part of the Development Plan and was adopted in March 2015. The Local Plan should be in general conformity with the London Plan. Policy 4.8 is concerned with Supporting a Successful and Diverse Retail Sector and Related Facilities and Services and states that the Mayor will, and boroughs and other stakeholders should, support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need. The London Plan Town Centres SPG (July 2014) states that Councils are encouraged to manage over concentrations of activities, for example, betting shops, hot food takeaways and pay day loan outlets. The supporting text outlines current and potential mechanisms for managing the over-concentration of such uses. In particular, paragraph 1.2.28 states that if the concentration of a use has reached saturation levels where the negative impacts outweigh benefits, local authorities can set thresholds at this level of saturation.</p>		
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					We have reviewed Policies DM42, DM43 and DM46 (and the associated supporting text) of the pre submission version of the Development Management DPD and our response to the policies and text is set out below.		
41	RDM142	DM 42 DM 43	No	Yes	<p>On review of the Council's pre-submission version of the Local Plan, it is clear that there are many hurdles that applications for betting shop uses need to overcome prior to even being assessed against Policy DM46 on 'Betting Shops'. Applications will also be assessed against Policies DM42 if located within primary and secondary frontages and Policy DM43 if located within a local shopping centre which contain thresholds for non-retail uses.</p> <p>As noted above, Policy DM42 notes that within primary shopping frontages of Metropolitan and District centres, the use of ground floor units for retail, financial & professional services, restaurants & cafes and pubs & bars will be permitted where the overall number of units in nonretail use (including extant planning permissions) will not exceed 35% unless a number of criteria can be satisfied. It is clear, that since betting shops are now considered under Sui Generis use, betting shop uses are not even considered appropriate for these</p>	Not specifically stated	The thresholds in DM42 & DM43 apply to all non-retail uses and not just betting shops. The application of the thresholds seeks to support and maintain the important role and function of Haringey's higher order town centres. In particular, ensuring the primary shopping area is mostly retail shops, with more flexibility provided within secondary and non-designated frontages for more diverse town centre uses. This approach accords with both national and regional policy and is consistent with the local evidence base. The policy does not deal with the clustering of uses, other than at Part C which addresses the

				<p>areas. It is not clear however if this is the intention of the policy wording, or whether betting shops have simply fallen off the policy due to the changes to the use classes.</p> <p>In secondary shopping frontages of the Metropolitan and District town centres, it is noted that the use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage unless a number of criteria can be satisfied.</p> <p>Policy DM43 notes that in local shopping centres, the use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage unless a number of criteria can be satisfied.</p> <p>It is noted within the policy supporting text (paragraphs 6.35, 6.37, 6.45 and 6.46) that the thresholds are supported by the Retail and Town Centres Study (2013) (which was published prior to Betting Shop uses being moved to the Sui Generis so refers to them under the A2 Use Class). However, on review</p>		<p>potential impacts of over concentrations of similar community uses.</p> <p>No change</p>
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				<p>of this document, it is unclear how this conclusion has actually been reached. When discussing the 'Clustering of Uses', the document is clear and it actually states:</p> <p>"Our analysis does not suggest that there is any significant clustering of specific uses, such as betting shops, within the town centres. A higher number of these types of uses can be found in the larger centres such as Wood Green, but this reflects the centre's Metropolitan Centre designation and the proportion of units in these uses remains small" (paragraph15.30);</p> <p>In regards to Local centres and A2-A5 uses it is noted that "our analysis has not identified any clustering in the Local Centres" (paragraph 15.31). The paragraph then goes on to state that the majority of local centres have just 1 betting shop and only 2 centres have more but both are larger local centres;</p> <p>"We therefore do not consider that there is any requirement to control the amount and location of Class A2 and A5 uses at this stage either through an Article 4 Direction or new planning policies" (paragraph 15.32).</p> <p>The study then notes that it may be</p>		
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				<p>appropriate to maintain a proportion of AI uses within each centre by providing threshold policy (as provided in the existing UDP) but states further that ‘if considered necessary, a criteria could be included that requires consideration on a case by case basis to be given to the balance of shops and services where a change of use to Class A2 or A3/A5 is proposed’ (paragraph 15.35).</p> <p>Taking this into consideration, it is clear that the study actually suggests that although AI threshold figures can be adopted, it may be appropriate to <u>consider an alternative criteria on a case by case basis</u> where a change to A2 use or A3/A5 uses is proposed.</p> <p>In addition, it is important to note that we had expected the Plan to provide an explanation as to why betting shops are not even considered appropriate within primary shopping frontages and why the <u>specific</u> threshold figures (35%, 50% respectively) have been chosen to assess concentration of uses. Disappointingly the document is silent on this critical point, as well as the Retail Study.</p> <p>A betting shop use is a typical town centre use and when grouped collectively with other ‘non-retail’ uses will no doubt amount to a high</p>		
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				<p>proportion of uses within centres already (prior to the policy being adopted). Many centres across the country and in Haringey are healthy, despite having a high number of non-retail uses.</p> <p>In addition, it should be noted that including extant planning permissions' within the threshold calculations is unreasonable, since many applications may not be implemented but would be required to be considered as part of the threshold calculation.</p> <p>There is a real danger that adopting such an approach will effectively put a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than out of centre.</p> <p>We strongly suggest that the Council revisits this proposed approach.</p> <p>We are also concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and</p>		
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					<p>promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should “promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres”. This is a sentiment echoed in the London Plan (Policy 4.8). Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre. Again, regard needs to be had to the very real impact that the document is likely to have on a number of different industries and the clear conflict that would arise with the NPPF and the London Plan.</p> <p>In this respect, it is considered that the document is unsound. It is not justified as it is not using the most appropriate strategy when considered to the alternatives suggested in the Retail Study. In addition, it is not effective as it is not flexible and it is not consistent with national policy.</p>		
41	RDM143	DM 46	No	Yes	<p>Part A of the policy states that proposals for betting shops should have regard to Policies DM42 and DM43. We have already provided our comments on these policies above and how we consider these policies unsound.</p>	Not specifically stated	<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of</p>

				<p>Part B of the policy states that the total number of betting shops (including extant planning permissions) will not exceed 5% of the units within the town or local centre. Within the supporting text for the policy, it is noted that the policy seeks to manage a proliferation or over-concentration of betting shops. It is also noted that the ‘Health Evidence Base’ document (2012) highlights the link between “health outcomes and the proximity of betting shops”. It concludes that there is sufficient evidence to demonstrate that “access to gambling venues, including betting shops, leads to increased gambling behaviour and that, this in turn, is associated with poor health outcome”. The supporting text then discusses the vitality and viability of the centres in the borough.</p> <p>It should be noted that Health and Vitality and Viability are completely separate issues. The NPPF recognises the role of the planning system in supporting the vitality of town centres and promoting healthy communities. Paragraph 23 of the NPPF is clear when it states that LPAs should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. In this regard, LPAs should set out</p>	<p>planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of</p>
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					<p>policies that make clear which uses will be permitted in such locations, and promote competitive town centres that provide a diverse retail offer which reflects the individuality of a town centre. However, it is considered that the Council are not pursuing policies that will support the vitality and viability of their centres as the stringent threshold policies they are proposing could discourage new operators and new uses out of centres not promoting competitive town centre environments</p>		<p>betting shops and hot food takeaways can give rise to particular concerns", which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p>
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							<p>The Council considers the policies 42 and 43 set out the most appropriate and robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change</p>
41	RDM144	DM 46	No	Not stated	<p>We consider that in line with the London Plan and Town Centres SPG (2014) the starting point for Plan policy making is whether there is an existing over concentration or cluster of uses (including betting shops) which has reached saturation levels where positive impacts are outweighed by negative impacts.</p> <p>As noted, the Council’s Retail and Town Centres Study (2013) (prepared by NLP) which is part of their evidence base clearly states that the analysis undertaken:</p> <p>Does not suggest that there is any significant clustering of specific uses, such as betting shops, within the town centres” (para 15.30).</p> <p>The study states that quite rightly,</p>	Not specifically stated	<p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The threshold of 5% needs to be seen in the context of non-retail</p>

				<p>there are a higher number of these types of uses within the larger centres (such as Wood Green) but this reflects the centre's Metropolitan centre designation and the proportion of units in these uses still remains small. In addition, in regards to the local centres the study suggests that:</p> <p>“The analysis has not identified any clustering” (paragraph 15.31)</p> <p>It is important to note that Haringey has 66 betting shops in the borough which is a far lower figure than many other London boroughs. It is even highlighted within the study that the majority of local centres have just 1 betting shop (only 2 centres have above 2 but these are larger local centres) and 8 local centres (of 38) had no betting shops at all at the time the study was published.</p> <p>From the evidence base information available it is impossible to establish whether saturation levels have been reached resulting in harm to the centres when assessed in line with the 8 criteria of London Plan policy 4.8. However, one would assume that based on the comments made in the Retail Study, that there is no concern over a cluster of these uses within the</p>		<p>provision within Town Centres in accordance with DM42 & DM43 and therefore would represent a significantly high portion of non-town centre uses, which the Council would class as an over concentration of a single type of use, harmful to the vitality of the town centre and giving rise to unacceptable health outcomes for local residents. If as suggested, there are not clusters of betting shops within Harrows town centres then the threshold will not be breached and applications for new betting premises will be approved.</p> <p>No change</p>
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					<p>centres or concern that saturation levels have being reached. On this basis, it is unclear how the 5% threshold figure in the policy has been derived at. There is no indication in the evidence base documents that this particular figure is appropriate and no explanation as to how, based on the evidence, the figure has been chosen. Indeed, the evidence base identifies no significant clusters of betting shop uses within the centres. As such, it is clear that there is no basis for the threshold figure.</p> <p>We consider that the document should provide further information on why the 5% threshold is appropriate. At present, in this regard, the policy is unsound as it is not 'justified' (it is not using the most appropriate strategy when taking into account the conclusions of the Retail Study), it is not 'effective' as it is not flexible nor is it 'consistent with national policy'.</p>		
41	RDM145	DM 46	No	Not stated	<p>As noted the supporting text of the Plan (paragraph 6.55) notes that the Council's 'Health Evidence Base' document (2012) highlights the link between health outcomes and the proximity of betting shops'. It concludes that there is sufficient evidence to demonstrate that access to gambling venues, including betting shops, leads to increased gambling</p>	<p>It is considered therefore that reference to the Health Evidence Base should be removed from the supporting text to Policy DM46 as it is not 'justified' or based on a credible evidence base.</p>	<p>The Council considers that the policy approach is in conformity with national and regional policy and was assessed against alternatives.</p> <p>The Sustainability Assessment appraised</p>

				<p>behaviour and that, this in turn, is associated with poor health outcomes". The document then states that the Council is committed to improving the health and well-being of its residents along with visitors of the borough and in light of the above evidence, it is considered appropriate for the Local Plan to seek to manage betting shops (by applying the 5% threshold policy).</p> <p>However, within the evidence base document it is clearly stated that:</p> <p>"Although many of these situational characteristics (e.g. concentration, clustering or proximity of venues) are thought to influence vulnerable gamblers, there has been very definitive conclusions can be made. The scientific literature therefore falls short of supporting particular densities or exclusion/saturation distances for betting shops in the area" (paragraph 6.2.54).</p> <p>This suggests that contrary to the Council's statements, there is not enough empirical evidence to support particular thresholds being formulated for betting shops on the grounds of health.</p> <p>However, it should be emphasised that this document relates to problem</p>		<p>the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The threshold of 5% needs to be seen in the context of non-retail provision within Town Centres in accordance with DM42 & DM43 and therefore would represent a significantly high portion of non-</p>
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				<p>gambling which is a matter already dealt with under the Licensing Act and a matter that cannot really be dealt with under the Planning system. It is important to note that gambling is one of the most heavily regulated activities in the country which has resulted in a socially responsible industry. Betting shops are governed by the three gambling objectives. Betting shop operators wishing to open a new betting shop must demonstrate that their operation will:</p> <ol style="list-style-type: none"> 1. prevent gambling from being a source of crime and disorder, being associated with crime or disorder, or being used to support crime; 2. ensure that gambling is conducted in a fair and open way; and 3. protect children and other vulnerable people from being harmed or exploited by gambling. <p>As such, when applying for their gaming licence, betting shop operators must provide information and evidence demonstrating that they have appropriate training and management procedures/policies in place to show that they will comply with these objectives, including the protection of children and other vulnerable people, something that betting shop operators take very seriously. This of course includes being members of various</p>		<p>town centre uses, which the Council would class as an over concentration of a single type of use, harmful to the vitality of the town centre. Therefore beyond ensuring the health outcomes of local residents is looked after, the threshold is also appropriate for maintaining the vitality of Haringey's town centres.</p> <p>No change</p>
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				<p>schemes. For example, Paddy Power was a founding member of the Senet Group, an independent body set up to promote responsible gambling standards. They are also certified by Gamcare, as are the majority of the major betting shop operators.</p> <p>Failure to demonstrate compliance with the objectives means that a licence will not be granted, and of course, if at any time a betting shop operator is found not to be complying with the objectives in the future, their licence can be reviewed and ultimately revoked. Where the licensing authority has any concerns about a new operation when considering a licence application, they are perfectly entitled to impose conditions on a licence to ensure that additional measures/policies/procedures are put in place.</p> <p>Taking this into consideration and in summary, we do not believe that the Council should be using problem gambling as a means to policy formulation when this matter is dealt with under the Licensing Act, nor is there any justification for a 5% threshold figure.</p> <p>It is considered therefore that reference to the Health Evidence Base</p>		
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					should be removed from the supporting text to Policy DM46 as it is not 'justified' or based on a credible evidence base.		
41	RDM146	DM 42 DM 43 DM 46	No	Not stated	<p>Summary and conclusions</p> <p>In our view policies DM42, DM43 and DM46 and supporting text paragraphs 6.54 – 6.57 are not 'justified', 'positively prepared' or 'consistent with national policy'. The policy and reasons are not founded on a robust and credible evidence base. Furthermore, the policy and supporting text is not consistent with national policy nor with the London Plan. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p> <p>We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any clusters or concentrations which would lead to</p>	<p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council's betting shop policy provides a good example of a 'model policy' that is appropriate and compliant with the aspirations of both regions and local policy. The policy states:</p> <p>"When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this</p>	<p>The Council considers that policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, in particular, town centre vitality and viability.</p> <p>The Council has reviewed Greenwich Council's betting shop policy and considered it ineffective in not providing any certainty as to how the policy may be applied.</p> <p>No change</p>

				<p>negative impacts, however, to assert unnecessary thresholds as a starting point for all new applications that are not based on a robust and credible evidence base is wholly unsubstantiated and does not allow officers/members to make objective decisions.</p> <p>Indeed, many of the centres will have exceeded the thresholds outlined in the policy already, many of the extant planning permissions will not be implemented, and if the decision-makers are told that there is already an issue with betting shop use within the borough, many will naturally conclude that an additional betting shop in an area would result in an area being at high risk of adverse impacts and there will be a tendency to conclude that the application should be refused. This is clearly unacceptable, particularly given that there is not specific robust and credible evidence to back up the document's presumptions in this regard.</p> <p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council's betting shop policy provides a good example of a 'model policy' that is appropriate and</p>	<p>particular type of use".</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan 'sound'.</p>	
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					<p>compliant with the aspirations of both regions and local policy. The policy states:</p> <p>“When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this particular type of use”.</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan ‘sound’.</p> <p>We would be grateful if you would take the above comments on board in the preparation of the Plan and request that you keep us informed on further progress and dates for the Examination in Public.</p>		
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Respondent 42: William Hill

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
42	RDM147	DM46	Not stated	Not stated	We object to the proposed policy under DM46 which is said to relate to local concerns about the “over concentration” of betting shops. “Over	Not specifically stated	Objection noted.

					<p>concentration” is undefined and the policy does not appear to be based on any clear empirical evidence relating to either vibrancy, vitality or evidence of any negative impact on public health. The proposed policy is neither necessary, proportionate or objectively justifiable and there is no reference to supporting evidence.</p>		
42	RDM148	DM42	Not stated	Not stated	<p>DM42 and 43 are already restrictive in their nature and to attempt to impose a 5% cap on the numbers of betting shops in addition to these other proposed restrictions is we believe unlawful and would be susceptible to judicial review on the grounds of unreasonableness. Such restrictions set an unwelcome precedent and William Hill would be minded to challenge as it prejudices the commercial well being of a business that has its headquarters in the Borough. William Hill employs some 250 people in Haringey and the authority should not be introducing a policy which prejudices local jobs (Administration offices and betting shops)</p> <p>Planning evidence held by William Hill (see below) supports the view that betting shops drive considerable footfall and, in attempting to bring forward such a policy, a conflict is created with the Gambling Act 2005.</p>	Not specifically stated	<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which</p>

				<p>The Authority is under a general duty to aim to permit gambling.</p> <p>Whilst planning and licensing law fall to be considered separately, this proposal clearly creates a conflict of laws. Gambling law specifically deals with issues relating to protecting children and the vulnerable so if this policy is related to the vibrancy and vitality of the high street, then the authority is duty bound to bring forward evidence that (a) there is an “over concentration” and (b) that such concentrations would damage the vibrancy and vitality of town or local centres. The plan produces no such evidence and if the authority proposes such restrictions then the onus is on it to provide the substantial evidence required to introduce a policy that is prima facie an interference with legitimate trade.</p> <p>A previous enquiry into betting shops in the Borough did not find any particular evidence of betting shops creating substantial social harm. Problem gambling levels in the UK are low by international standards (0.4%) and probably falling. The Authority have also failed to consider the negative outcomes of an overly restrictive policy in terms of creating a risk that this restriction may cause unmet demand for gambling and a risk of migration to</p>	<p>states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change</p>
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					<p>an illegal market.</p> <p>A restrictive policy is also at odds with competition law as it introduces market restriction which has a direct impact on new market entrants.</p>		
42	RDM149	DM43	Not stated	Not stated	<p>DM42 and 43 are already restrictive in their nature and to attempt to impose a 5% cap on the numbers of betting shops in addition to these other proposed restrictions is we believe unlawful and would be susceptible to judicial review on the grounds of unreasonableness. Such restrictions set an unwelcome precedent and William Hill would be minded to challenge as it prejudices the commercial well being of a business that has its headquarters in the Borough. William Hill employs some 250 people in Haringey and the authority should not be introducing a policy which prejudices local jobs (Administration offices and betting shops)</p> <p>Planning evidence held by William Hill (see below) supports the view that betting shops drive considerable footfall and, in attempting to bring forward such a policy, a conflict is created with the Gambling Act 2005. The Authority is under a general duty to aim to permit gambling.</p>	Not specifically stated	<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular</p>

				<p>Whilst planning and licensing law fall to be considered separately, this proposal clearly creates a conflict of laws. Gambling law specifically deals with issues relating to protecting children and the vulnerable so if this policy is related to the vibrancy and vitality of the high street, then the authority is duty bound to bring forward evidence that (a) there is an “over concentration” and (b) that such concentrations would damage the vibrancy and vitality of town or local centres. The plan produces no such evidence and if the authority proposes such restrictions then the onus is on it to provide the substantial evidence required to introduce a policy that is prima facie an interference with legitimate trade.</p> <p>A previous enquiry into betting shops in the Borough did not find any particular evidence of betting shops creating substantial social harm. Problem gambling levels in the UK are low by international standards (0.4%) and probably falling. The Authority have also failed to consider the negative outcomes of an overly restrictive policy in terms of creating a risk that this restriction may cause unmet demand for gambling and a risk of migration to an illegal market.</p> <p>A restrictive policy is also at odds with</p>	<p>concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change</p>
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					competition law as it introduces market restriction which has a direct impact on new market entrants.		
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Respondent 43: Steve Simms

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
43	RDM150	DM47	No	No	Compliance We consider that no regard has been given to national policy and advice in preparing Policy DM47 because no National Planning Policy Framework (NPPF) policies deal with dietary issues. This means that the draft DM DPD does not comply with sub-section 19 (2) (a) of The Planning and Compulsory Purchase Act 2004 (PCPA04). Specifically, taking into account the proximity of hot food takeaways to schools or indeed any other type of facility has no basis in national policy and national practice guidance simply refers to a briefing paper containing case studies on the issue. Indeed, restricting accessibility to services is directly contrary to national policy. We consider that no regard has been given to national policy and advice in preparing Policy DM47 because the draft DM DPD would furthermore be rendered unsound in terms of the criteria set out at NPPF paragraph 182. This also means that the draft DM DPD does not	The deletion of Policy DM47 Part (A) entirely, and, from Part (B), the text “Subject to (A) above” and “only” and the criteria (b) and (c). Specific percentage	The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.

				<p>comply with sub-section 19 (2) (a) of PCPA04. We do not consider a reasoned justification for the draft policy has been substantially provided in accordance with regulation 8 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012. Neither the text at paragraphs 6.58 – 6.62 nor the evidence base support zonal restrictions on food and drink uses.</p> <p>Positively Prepared The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a primary or secondary school as zero, but does so without evidence of either a link between the incidence of childhood obesity and the proximity of hot food takeaways to schools or of any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed. In fact, the distance chosen has the effect of banning hot food takeaways from a large majority of the Borough. Because no assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts. The policy is negative in its assumptions, using the</p>	<p>The Council considers that the policy approach is also in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Council considers the approach is the most appropriate when considered against alternatives, having been considered through the Sustainability Appraisal process, and is supported by up-to-date technical evidence.</p> <p>Council agrees to an amendment to paragraph 6.59 for sentence to read: “The Public Health Directorate has published a health evidence base, which, along with Hot Food Takeaway Shops: An</p>
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				<p>concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. Justified The only evidence referred to specific to the draft policy appears to be a Government Office for Science Report from 2007 that simply observes that diet is a key determinant of obesity levels. It does not make a spatial link between the incidence of obesity and the proximity of hot food takeaways to schools or indeed any other locations. Whilst supporting text to Policy 3.2 of the London Plan at paragraph 3.11 suggests that planning policies established as contributing to health “...can be complemented by other measures, such as local policies to address concerns over the development of fast food outlets close to schools”, this does not itself represent evidence. Indeed, it aspires only to tackle “concerns” and omits a definition of what “close” might mean because no adverse effects of the proximity of hot food takeaways to schools have been established. To that extent, the London Plan simply passes responsibility on to Boroughs to justify any such policies they may seek to promote. There is no objective evidence for any link between</p>		<p><u>Evidence Base Study (2015) to has informed preparation of Haringey’s Local Plan.</u></p>
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				<p>the incidence of obesity and the proximity of hot food takeaways to schools, so it is at best unclear whether refusing planning applications for hot food takeaways on the basis suggested could ever have an effect on the incidence of obesity, childhood or adult, near schools or elsewhere. The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children's diets are quite properly the responsibility their parents or guardians. Consequently, it is far from clear how refusing planning permission for hot food take-aways "close to" primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. A further difficulty of using simple distance radii as shown in Figure 6.1 is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key</p>	
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				<p>determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more appropriate strategy for reducing childhood obesity. Whilst no evidence is presented to support any public health effects of concentrations of food and drink uses referred to in draft Policy DM47 (B), we consider high concentrations of any one type of use are unhealthy in retail health terms, and that this may sometimes also be the case in terms of human health. Effective For the reasons set out above in respect of the lack of justification for the policy, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods; however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. The area that would be affected by the policy covers most of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against the objective result in reduction or expansion of the zones? What other corrective action might be taken short of its</p>		
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					<p>withdrawal? Consistent with National Policy We consider that no regard has been had to national policy and advice in preparing Policy DM47 because none of the NPPF policies include dietary issues. The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable. National practice guidance simply refers to a briefing paper containing case studies.</p>		
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Respondent 44: Planware on behalf of McDonald's Restaurants Ltd

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
44	RD M151	DM47	Not Stated	Not Stated	<p>This response relates to Policy DM47 and the supporting text of the above consultation document.</p> <p>We have considered Policy DM47 with regard to the principles set out within the Framework. Local Plans should "plan" positively for development; be justified; effective; and consistent with the Framework.</p> <p>The policy restricts proposals for hot food takeaway shops located within 400 metres of the boundaries of a primary or secondary school. Additionally the policy restricts the percentage of hot food takeaway shops will not exceed 5% of</p>	Not stated.	Obesity and, in particular, child obesity, is a significant health issue facing the country and also Haringey. As shown in the recent Joint Strategic Needs Assessment, Haringey has a high proportion of obese

				<p>designated shopping frontage in Metropolitan and District Town Centres. Furthermore, the policy restricts the concentration of hot food takeaways in the Borough.</p> <p>We consider that limiting the location, number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices.</p> <p>There is no adequate evidence to justify the underlying assumption, that locating any Hot Food Takeaway within certain distances of schools causes adverse health consequences, which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or a restriction on the location and concentration of Hot Food Takeaways.</p> <p>We consider that a 5% threshold is unjustified. To limit Hot Food Takeaway units to 5% of any designated shopping frontage would be too restrictive.</p> <p>2. Such an approach is not positive, justified, effective or consistent with the Framework.</p> <p>Restricting the quantity, concentration and location of Hot Food Takeaway proposals within the borough, is not a positive approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic, environmental and social progress for this and future generations.</p> <p>The suggested restriction, takes an ambiguous view of Hot Food Takeaway uses in relation to the proximity to primary and secondary schools. It would apply an over-generic approach to</p>		<p>children when benchmarked against London and national averages. The prevalence of obesity disproportionately affects those from lower socioeconomic backgrounds, with children living in the east of the borough particularly affected. The NHS is trying to tackle this significant issue using all means possible, including the planning system, through the promotion of more active lifestyles (walking, cycling networks, quiet ways, cycle facilities at work – showers & lockers – open space provision, retention of playing fields, inclusive design, recreation facilities etc) and through prevention (restrictions on uses</p>
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				<p>restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.</p> <p>Thus is inconsistent with Para 19 and 21 of the Framework. Para 19 states: <i>Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</i></p> <p>2.4 Para 21 states:</p> <p><i>Investment in business should not be over-burdened by the combined requirements of planning policy expectations.</i></p> <p>Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at Appendix A.</p> <p>A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation <i>'did not find strong evidence at this time to justify policies related to regulating the food environments around schools.'</i> It instead highlighted the need to <i>'develop a higher quality evidence base'</i>.¹</p> <p>This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating <i>'the evidence base does not adequately justify the need for such a policy'</i>, and due to the lack of information, it is impossible to <i>'assess their likely</i></p>	<p>that contribute to poor health outcomes).</p> <p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being of local residents, particularly those most vulnerable – our children.</p> <p>Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also</p>
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				<p><i>impact on the town, district or local centres</i>'.²</p> <p>The evidence provided at Appendix B confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.³</p> <p>No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.</p> <p>There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in Appendix C.</p> <p>Research by Peter Dolton states that <i>"At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."</i>⁴ This clarifies that a blanket restriction on opening hours is unjustified.</p> <p>Similarly, research by Brighton & Hove concluded that <i>"the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding allowing students to leave school premises during the day"</i>.⁵</p> <p>Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix D.</p> <p>1 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th</p>		<p>considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that "over-concentrations of betting shops and hot food takeaways can give rise to particular concerns", which is supported by local technical evidence.</p> <p>The Council considers the</p>
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				<p>December 2013. <i>A systematic review of the influence of the retail food environment around schools on obesity-related outcomes.</i></p> <p>2 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate</p> <p>3 <i>The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools</i>, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University</p> <p>4 Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, <i>Childhood Obesity in the UK: Is Fast Food a Factor?</i> http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt</p> <p>5 Brighton & Hove City Council & NHS Sussex, <i>Hot-food takeaways near schools: An impact study on takeaways near secondary schools in Brighton and Hove</i>, page 30, September 2011 Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>Given the limited access that children have to fast food during the school day, a generic restriction is disproportionate; is not justified; and would not be effective.</p> <p>Such an approach would have a disproportionate effect on land use planning and the economy when taking into account the limited purchases made by school children who may only have the potential to visit Hot Food Takeaway establishments at the end of the school day, and only during term time.</p> <p>The proposed 5% restriction on Hot Food Takeaway uses is considered unsound. No consideration is given to other A class</p>	<p>approach is the most appropriate when considered against alternatives, having been considered through the Sustainability Appraisal process, and is supported by up-to-date technical evidence.</p> <p>Change: At paragraph 6.59 amend for sentence to read: “The Public Health Directorate has published a health evidence base, <u>which, along with Hot Food Takeaway Shops: An Evidence Base Study (2015)</u> to <u>has informed</u> preparation of Haringey’s Local Plan.</p>
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				<p>uses. The policy directly conflicts with national guidance, and would provide an overly restrictive limitation on prospective development. The percentage threshold is too low.</p> <p>Not all Hot Food Takeaway uses contribute to unattractive shopping frontages. Takeaway units can provide active frontages within the streetscene throughout the day.</p> <p>The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.</p> <p>The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.</p> <p>3. Soundness - summary</p> <p>We consider that restricting the quantity, concentration and location of hot food takeaways would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.</p> <p>Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of.</p>		
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				<p>4. McDonald's has made major steps in recent years to expand the range of healthy offerings</p> <p>As a responsible business, McDonald's recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald's has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald's has:</p> <p>Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu</p> <p>Completely removed hydrogenated trans-fats from its menu</p> <p>Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003</p> <p>Reduced fat in its milkshakes by 34% per serving since 2010</p> <p>Reduced fat in its deli rolls by 42% since 2011 Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>McDonald's has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald's has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.</p> <p>This is in addition to the nutritional information that is already available on its website, on its tray liners, on its packaging, and via McDonald's mobile phone app. In 2012 alone, McDonald's</p>		
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				<p>received 2.2 million visits to its nutrition web page.</p> <p>Furthermore, McDonald's is committed to responsible advertising, and advertise to children only food items that are not classified by the Government's nutrient scoring criteria as High in Fat, Salt or Sugar "non-HFSS". All of McDonald's advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.</p> <p>As a significant customer of British farming, McDonald's buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009.</p> <p>All of McDonald's burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.</p> <p>In addition, McDonald's only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.</p> <p>McDonald's was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald's use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded 'Food Business of the Year' by the British Free Range Egg Producers Association.</p> <p>The strength of McDonald's supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris Elliott, who said in light of the horsemeat scandal: "<i>McDonald's invited us to look at farms and abattoirs – it was a very simple</i></p>		
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				<p><i>supply chain. The other thing I was very impressed about was the length of contract McDonald's had with its suppliers."</i>⁶</p> <p>6 Evidence at Environment, Food & Rural Affairs Select Committee Inquiry, January 2014</p> <p>5. McDonald's also contributes to the community</p> <p>As the Community Partner of the Football Association, McDonald's has helped to train and recruit more than 25,000 coaches. These coaches in turn have provided more than 2 million hours of free quality coaching, to one million young players.</p> <p>Over 1,000 McDonald's restaurants across the UK are 'twinned' with a local team to provide free kit, equipment, advice and expertise.</p> <p>Each of McDonald's restaurants also conduct a minimum of three litter patrols on a daily basis, and conduct larger Love Where You Live 'clean up' events. McDonald's is also the primary sponsor of the Mayor of London's Capital Clean Up campaign, to tackle litter across London. Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>Last year, McDonald's restaurants in Greater London organised over 50 community clean-up events, with over 1,400 volunteers taking part.</p> <p>6. McDonald's is a major employer of young people</p> <p>McDonald's is a major employer of young people under the age of 25, and for many it provides a first step on the career ladder. McDonald's offers all staff the opportunity to gain qualifications which include Adult Certificates in English and Maths, a Level 2</p>		
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				<p>Apprenticeship, and a Foundation Degree in Managing Business Operations.</p> <p>McDonald's invest £43 million annually in staff training and development</p> <p>7. There is a lack of evidence to demonstrate whether fast food is located by schools, or whether schools are located by town centres</p> <p>When McDonald's looks at the economic viability of a new site, it does not factor in predicted sales from school children or proximity to schools.</p> <p>Research by Christoph Buck has identified a similar approach with other retailers. His research suggests that <i>'food retailers are mainly located near major roads and in inner cities.'</i>⁷</p> <p>Indeed, <i>'food retailers are not clustered around schools for up to 1.5 km'</i>⁸ Correlations between schools and fast food density are therefore due to the proximity of both to town centres, where there is a broad mix of retail on offer.</p> <p>With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres – contrary to the sequential test.</p>		
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Respondent 45: NHS Property Services

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
45	RDM152	DM 49	Not Stated	Not Stated	NHS PS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare	Not stated.	Noted.

					<p>and working environments. NHS PS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>NHS PS responded to Draft Policy DM58: Managing the Provision of Community Infrastructure as part of the “preferred options” consultation, February 2015. NHS PS has reviewed Policy DM49: Managing the Provision and Quality of Community Infrastructure of the Development Management DPD Pre-Submission Version. NHS PS notes the inclusion of Paragraph 7.17 within the supporting text of policy DM49. NHS PS welcomes this inclusion. The Policy now provides a greater degree of flexibility, and would allow the NHS to manage its estate more efficiently.</p> <p>NHS PS now considers Policy DM49 to be consistent with paragraph 3.87A of the 2015 London Plan (FALP).</p>		
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Respondent 46: Environment Agency

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27 DM28	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.	In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments	<p>Additional text to paragraph 4.77 as follows:</p> <p><u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment</u></p>

						<p>rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account.</p> <p>We recommend that you include our suggested wording below to address this.</p> <p><i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i></p>	<p><u>submitted for sites at risk of fluvial flooding.</u></p>
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Respondent 47: Campaign to Protect Rural England

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
47	RDM154	DM20, Point A	Not stated	Not stated	Policy DM20, Point A, should reiterate those policies laid out in Policy SP13, in particular in relation to Green belt and Metropolitan Open Land (MOL). Additionally, the text in Point A, relating to granting permission that result in the loss of open space where the open space has been assessed as being surplus to requirements, does not hold for these two designations which receive the strongest protection in the London Plan and National Policy: Green Belt and MOL is protected from inappropriate development, unless exceptional circumstances can be proven.	The text of this section should be amended to reflect the strongest protection afforded to Green Belt and MOL.	<p>The Council does not consider it necessary to repeat the requirements of Policy SP 13 here – the cross reference to this policy is sufficient for signposting.</p> <p>Policy SP 13 and DM 20 make clear that open space will be protected from inappropriate development. This includes considerations for protecting MOL and Green Belt, in line with the London Plan and NPPF.</p> <p>No change.</p>
47	RDM155	DM 20 Point B	Not stated	Not stated	Under Point B of Policy DM20, an additional criterion should be added on the basis of significant community consultation and recognition of their support.	Under Point B of Policy DM20, an additional criterion should be added on the basis of significant community consultation and recognition of their support.	<p>The Council does not consider this to be an appropriate planning consideration for determining the acceptability of proposals. Consultation forms part of the planning application process and officers will have regard to the support or opposition given to a specific proposal, and will weigh this against the planning merit of the proposal.</p>

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Respondent 48: Alan Stanton

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
48	RDM156	DM51	No (not effective)	Not stated	There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need. The assessment of the need for school places does not appear to reflect the implications of building high rise, largely one or two bedroom flats. What provision will there be for community facilities? Whilst the Council's recent school planning places document suggests an increased child population because of the regeneration, Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. The outcome of this policy is likely to be a	Not specifically stated	Disagree. The Council considers that the Local Plan sets a positive framework for the provision of infrastructure, including social infrastructure, to appropriately support delivery of the spatial strategy for the Borough. Policies SP 16 and SP 17 set out the strategic approach in this regard, with other Local Plan documents giving effect to these strategic policies. The Council has prepared an Infrastructure Delivery Plan (IDP) which sets out the service areas where investment will be needed to support growth over the plan period. The IDP will be reviewed and updated regularly over the life of the plan, reflecting delivery across these areas.

					shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use.		DM 51 is not considered to restrict the scope of delivering childcare provision to meet need. The policy supports this use in appropriate residential and non-residential buildings and locations, however recognising the Council's position to protect against the loss of housing in line with other Local Plan policies. No change
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Respondent 49: London Borough of Hackney

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
49	RDM157	DM39	Not stated	Not stated	It is also noted that Haringey has made provision for proposals for warehouse living within the Haringey Warehouse District as defined in the Site Allocations Local Plan. A number of these sites allocations are situated at the Borough boundary. Policy DM39: Warehouse Living set out the criteria which proposals for warehousing living will be assessed against. Live / work arrangements are not supported under Hackney's existing	Not specifically stated	Noted. These policies respond to issues experienced in respect of unauthorised uses in Haringey's designated employment areas. By legitimising warehouse living through the statutory development plan, ensuring transparency around control and management around the different uses on these sites, the Council is seeking to ensure that the outcomes are enforceable. Part E of the Policy reflects the experiences of Hackney and other London boroughs and resists

					<p>Development Plan due to the historical loss of employment floorspace in the Borough through residential conversions and the difficulty in regulating the work component. Whilst the DM39 considers controls over management and warehouse living space, there is a concern that this policy may potentially create a number of land-use and enforcement problems in the future if not monitored rigorously.</p> <p>The Council would welcome further discussion with Haringey officers to understand how the employment policies within the DMDPD (in particular DM39), and allocations within SADPD have been underpinned by the Council's Employment Land Study and Economic Growth Assessment.</p>		<p>proposals for Live/Work units anywhere in the borough's employment land stock.</p> <p>Haringey Council notes that since this response was submitted, it has held a meeting with Hackney officers, in line with the Duty to Cooperate, where the emerging Local Plan policies were discussed.</p> <p>No change</p>
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Respondent 50: CGMS on behalf of Highgate Capital LLP

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
50	RDM158	DM 40	Not Stated	Not Stated	Highgate Capital LLP seek further to make representations to the wording outlined within emerging policy DM40 which seeks to regulate the loss of non-designated employment land and floorspace to a non-employment	Greater flexibility in the requirement to provide 3 years worth of marketing evidence where loss of employment floorspace is	The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect

				<p>use. Supporting text at paragraph 6.26 of the pre-submission document states that; “Where a loss of non-designated employment land or floorspace is proposed the Council will require that applicants submit a statement and evidence demonstrating that the site is no longer suitable or viable for the existing or an alternative employment use. Considerations may include access, compatibility of adjoining uses, site size and orientation and other potential development constraints”. Where land has been vacant and underutilised for a sustained period of time this should suffice in reasonably justifying a change of use of the site to enable its immediate regeneration. Highgate Capital however consider the requirement to provide 3 years marketing evidence overly restrictive, particularly in cases where the use of the land has been vacant for a sustained period of time. In itself, this should mark compelling evidence as to the marketability of the site and further market demand for re-providing such uses on site.</p>	<p>proposed</p>	<p>against the loss of employment land and floorspace in order to deliver the Borough’s spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use.</p> <p>No change.</p>
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					<p>Policy should be more flexible to ensure that employment land continues to meet the demand of the industry, and should market demand change over a period less than 3 years, then policy should be more responsive to this need. The Government favour a flexible response to reallocating redundant employment land, as evidenced by paragraph 22 of the NPPF, and the proposed alterations to the NPPF, which states in paragraph 35 that: <i>“a balance needs to be struck between making land available to meet commercial and economic needs, and not reserving land which has little likelihood of being taken up for these uses”</i>.</p> <p>In addition to this, it is further held within the proposed alterations that timeframes to provide evidence of market interest should be revisited to enable greater avenue towards the release of unused non-designated and indeed designated employment land.</p> <p>A 3 year marketing campaign is therefore too onerous where there is no reasonable prospect of the employment floorspace being used for employment uses, and will restrict the bringing forward of</p>		
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					<p>other viable uses for these sites, leading to vacant buildings that make a negative contribution to Haringey and the wider area. Therefore the policy needs to ensure it is not overly restrictive by imposing a 3 year rule. It must take a more holistic approach considering the surrounding area, the condition of the site and its ability to meet the needs of modern industry. A reduced period of 1-2 years should suffice in such instances.</p>		
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Respondent 51: Greater London Authority

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
51	RDM159	DM 5 DM 6	Not Stated	Not Stated	<p>Locally Significant Views and Vistas and Building Heights There appears to be significant overlap between the locally significant views and the locations identified as being suitable for tall buildings. The document states that a Tall Buildings and Views Supplementary Planning Document will be produced. However, to ensure a robust approach, the borough should consider providing more detail in</p>	<p>The borough should consider providing more detail in policy DM5 and DM6 as to what the views are aiming to preserve. Further detail should also be provided in the Wood Green Area Action Plan (AAP).</p>	<p>Policy DM5 and its associated table should be read in conjunction with the Schedule of Locally Significant Views included as Appendix A of the DM DPD, which provides further details in this respect – for example, ‘viewing places’ and ‘assessment points’, along with types of view (i.e. panorama, linear, townscape). To assist with policy implementation, the</p>

					policy DM5 and DM6 as to what the views are aiming to preserve. Further detail should also be provided in the Wood Green Area Action Plan (AAP).		Council will prepare a Tall Buildings and View SPG. The Council will also give consideration to further details in the Wood Green AAP.
51	RDM160	DM11	Not Stated	Not Stated	Housing Mix The Mayor welcomes Haringey's acknowledgement of the important role the private rented sector can play in providing housing choice. However, proposed policy DM11 should recognise, as the London Plan does, the distinct economics of covenanted private rented developments and this should be taken into account when undertaking viability assessments of covenanted schemes. Building on the draft interim version, the Mayor's Housing SPG will be published in March and will provide further guidance on the working of covenants and clawback mechanisms for private rented developments.	Proposed policy DM11 should recognise, as the London Plan does, the distinct economics of covenanted private rented developments and this should be taken into account when undertaking viability assessments of covenanted schemes.	Include the following after the 3 rd sentence at paragraph 3.9: "In accordance with the London Plan, the distinct economics of covenanted private rented developments will be taken into account in the assessment of scheme viability."
51	RDM161	DM15	Not Stated	Not Stated	Special needs housing It is noted that the council will have regard to the London Plan's monitoring benchmarks for the provision of specialist housing for older	The 2015 London Plan is clear that boroughs should identify and address the need for specialist older person's accommodation, including through targets	Paragraph 3.29 sets out that the Council will monitor delivery of specialist housing, having regard to the indicative benchmarks set out in

					<p>people, this is welcomed. However, as stated in the Mayor's previous letter, the 2015 London Plan is clear that boroughs should identify and address the need for specialist older person's accommodation, including through targets and performance indicators. In addition, para 3.50C states that Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites. It is suggested that Policy DM15 and supporting text should be updated to address this. Opportunities for identifying suitable locations for older people housing could be progressed through Haringey's emerging Area Action Plans.</p>	<p>and performance indicators. In addition, para 3.50C states that Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites. It is suggested that Policy DM15 and supporting text should be updated to address this</p>	<p>Table A5.1 of the London Plan.</p> <p>Paragraph 3.30 reflects the suggested change re: London Plan paragraph 3.50C, stating that the Council will seek to work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites.</p> <p>It should be noted that this may include refurbishment of existing houses.</p> <p>Haringey's Housing Strategy will include further details on how specialist accommodation for older people may be delivered.</p> <p>No change</p>
51	RDM162	DM22	Not Stated	Not Stated	<p>Energy and carbon dioxide emissions</p> <p>The Mayor welcomes the changes to the draft document, in line with his previous comments on this matter. With regards to the Mayor's carbon dioxide targets, as set out in policy 5.2 of the London Plan,</p>	<p>In support of policy 5.2 of the London Plan, the Mayor would encourage Haringey to set out an approach to carbon off-setting and establishing a ring-fenced fund in line with his Sustainable Design and Construction (SD&C) SPG.</p>	<p>The Council notes the Mayor's forthcoming guidance documents.</p> <p>Policy DM 21.D sets out the Local Plan approach on carbon-offsetting, in line with the London Plan, and further details in this respect will be included in</p>

					<p>further guidance on the definition of ‘zero carbon’ homes will be provided in the Housing SPG in March. Guidance on zero carbon development will also be provided in the revised Energy Planning - GLA Guidance on preparing energy assessments document. In support of policy 5.2 of the London Plan, the Mayor would encourage Haringey to set out an approach to carbon off-setting and establishing a ring-fenced fund in line with his Sustainable Design and Construction (SD&C) SPG.</p>		<p>supplementary planning documents.</p> <p>No change</p>
51	RDM163	Paragraph 4.31	Not Stated	Not Stated	<p>Overheating and cooling The changes to this section are welcome. There is an opportunity to note the importance of providing ‘cool’ refuges within the public realm. Such an approach could link in with Haringey’s proposed approach to open space and the green grid, especially where paragraph 4.15 notes the projected population increase, much of which is likely to be housed in flats with limited access to a</p>	<p>There is an opportunity to note the importance of providing ‘cool’ refuges within the public realm.</p>	<p>Noted. The Council considers that this point is addressed by the London Plan. However, further consideration will be given to including local guidance on this matter in its supplementary planning documents.</p>

					garden.		
51	RDM164	DM23	Not Stated	Not Stated	<p>Air Quality The Mayor welcomes Haringey's approach to environmental protection. The section on air quality should note the London Plan's 'air quality neutral' approach set out in London Plan policy 7.14 and the SD&C SPG. The Mayor's revised 'The Control of Dust and Emissions from Construction and Demolition' was published in 2014 and is available on the Mayor's web-site.</p>		<p>The Council considers that Policy DM 23.A reflects the London Plan position that all development should be at least 'air quality neutral' and not lead to a further deterioration of existing poor air quality in Air Quality Management Areas. However, this will be further clarified in the supporting text.</p> <p>Additional sentence at end of paragraph 4.58 to read:</p> <p>"In line with London Plan Policy 7.14, the Council expects that all development should be at least 'air quality neutral'."</p> <p>To reflect updated guidance, amend paragraph 4.59 to read:</p> <p>"The GLA and London Council's Best Practice Guidance on <u>Mayor's 'The Control of Dust Emissions from Construction and Demolition' SPG (2014) should be...</u>"</p>
51	RDM165	DM24,	Not	Not	Flood Risk, Surface Drainage	These three policies should	The Council considers that

		DM25, DM26	Stated	Stated	Systems and Critical Drainage Areas These three policies should be more closely linked with regards to the potential impacts and mitigation measures. Whilst Sustainable Drainage Systems are important across the borough, they are critical up catchment from the Critical Drainage Areas. In Critical Drainage Areas it is important that development does not displace potential flood water onto nearby sites. The impacts of flooding in Critical Drainage Areas may be as great as in Flood Zones 2 and 3a.	be more closely linked with regards to the potential impacts and mitigation measures.	the Local Plan presents an appropriate framework for managing flood risk, consistent with the NPPF. Comments in respect of Critical Drainage Areas are noted. The Council agrees that a rigorous approach is needed to assess impacts of development in all vulnerable areas. Therefore, the overarching Policy DM 24 (Managing and Reducing Flood Risk) provides that site specific Flood Risk Assessments will be required for all proposals in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has identified critical drainage problems. FRAs will provide a basis for consideration of site specific issues in respect of impacts and appropriate mitigation. No change.
51	RDM166	Paragraph 7.35	Not Stated	Not Stated	Employment The Mayor welcomes the locally specific approach to Haringey's proposed employment policies that seek to reinvigorate and	The Mayor welcomes the locally specific approach to Haringey's proposed employment policies that seek to reinvigorate and intensify areas of	The Council welcomes the support for its suite of employment policies. Policy DM 55 sets out principles for regeneration and masterplanning to

					intensify areas of employment, where required, in order for Haringey to provide sufficient floorspace to meet its employment projections set out in Table 1.1 of the London Plan. This objective should also be reflected in paragraph 7.35 so that not only housing potential is noted, but also an intensified employment offer, where appropriate. The Mayor also welcomes the sequential approach to the redevelopment of non-designated employment land to provide similarly lower value land uses such as community infrastructure.	employment, where required, in order for Haringey to provide sufficient floorspace to meet its employment projections set out in Table 1.1 of the London Plan. This objective should also be reflected in paragraph 7.35 so that not only housing potential is noted, but also an intensified employment offer, where appropriate	ensure delivery of the spatial strategy. Paragraph 7.35 is used as an example where this approach can help with delivery in respect of housing. The Council does not consider it necessary to incorporate the suggested change here, as the Local Plan clearly sets out the objectives and policies in respect employment elsewhere in the Plan. No change
51	RDM167	DM46, DM47	Not Stated	Not Stated	Town centres and Retail The Mayor supports Haringey's aim to ensure vibrant high streets by managing the overconcentration of betting shops. He also supports the approach to limiting hot food take-away in order to address public health issues.		The Council welcomes support for the proposed policies.

Respondent 52: Transport for London

ID	Rep ID	Policy / Para /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure					
52	RDM168	DM 3 Para 2.16	Not Stated	Not Stated	Public Realm - Advertisements – Welcome the reference in paragraph 2.16 – although the text should be corrected to “<u>Transport for London Road Network</u>” and the date of the TfL Streetscape Guidance is 2015 not 2009. TfL has a set criteria of requirements that it imposes on advertisement on the Transport for London Road Network (TLRN), particularly illuminated/electronic signs. This requires a number of conditions to be imposed in order to mitigate any impact on safety/driver distraction, details of these can be provided if required.	The text should be corrected to “ <u>Transport for London Road Network</u> ” and the date of the TfL Streetscape Guidance is 2015 not 2009	Noted. Amend last sentence in paragraph 2.16 to read: Transport for London’s (TfL) Streetscape Guidance (2009 (2015)) provides guidance for use on TfL roads <u>the Transport for London Road Network (TLRN)</u>.
52	RDM169	DM55	Not Stated	Not Stated	Regeneration and Masterplanning– the principle of Policy DM55 is welcomed. Within the context of Crossrail 2 it will be important to provide the necessary flexibility so that currently safeguarded land can, where appropriate change as a result of changing economic circumstances. Notwithstanding this, further flexibility may be required if full benefits from Crossrail 2 are to be realised. For example, the re-provision of existing employment facilities allowing for alternative development which capitalises on Crossrail 2 benefits and supports wider regeneration objectives to take place. Paragraph 7.35 refers to the positive impact that Crossrail will have on	Clarify references to Crossrail and Crossrail 2 in paragraph 7.35 Incorporate direct reference to maximising the transformative impacts of Crossrail 2 in policy DM55	Policy DM 55 sets out principles for regeneration and masterplanning to ensure delivery of the spatial strategy. Whilst recognising that the application of this policy will be particularly important to optimise the benefits of Crossrail 2, as provided in the supporting text, the Council does not consider it appropriate to list specific circumstances in the main policy text. The 2 nd last sentence of Paragraph 7.35 amended to clarify reference to

					accessibility in the borough. It is unclear whether this relates to Crossrail 2 (which is proposed to directly serve the borough) or Crossrail (1), which will not. Should this relate to Crossrail 2; this should be made more explicit. The overall emphasis of this text is supported, although reference to maximising the transformative impacts of Crossrail 2 for development and regeneration should be referenced directly within policy DM55.		Crossrail 2 as follows: Another such example will be <u>Crossrail 2</u> which will redefine accessibility levels in parts of the Borough.
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Respondent 53: Historic England

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
53	RDM170	DM6	Not stated	Not stated	We welcome the inclusion of the significance of heritage assets and their settings as a design requirement when assessing proposals for both 'taller' and 'tall' buildings. However it is important to ensure consistency in the evidence used to support both forms of tall buildings. For example paragraph 2.42 states that Council's approach to Tall buildings has been informed by their own Urban Characterisation Study and the Tall Buildings Location Validation Study. This implies that there is no evidence to support the concept and potential location of 'taller' buildings. This raises concerns on the robustness of this aspect of the policy and its deliverability without causing potential harm to heritage interests. Further clarification is needed on this important aspect	Clarification needed	The issue with 'taller' buildings is that they are not specific to locations, rather they are deemed suitable across the borough subject to meeting the policy tests, as well as other policy requirements in the plan including those relating to density and urban design. This should naturally limit their

							acceptability to only certain circumstances
							No change
53	RDM171	DM 5	Not stated	Not stated	Paragraph 2.35 should be amended to include both Conservation Area Management Plans and Appraisals, as a source of views that proposals need to be considered.	Paragraph 2.35 should be amended to include both Conservation Area Management Plans and Appraisals, as a source of views that proposals need to be considered.	Paragraph 2.35 amended to read: There are a number of views included in the Council's Conservation Area Management Plans and Appraisals that proposals should have regard to in order to positively respond to local character.
53	RDM172	DM 9	Not stated	Not stated	In general the policy provides a useful framework in which to manage Haringey's historic environment . However, in its current form insufficient guidance is given on how to treat issues around potential harm to the significance of heritage assets. In particular it does not consider the level of harm that could be caused, its relationship with the significance of the heritage asset (as potentially expressed in its grade and type) and the reason when harm may be justified. It is noted with interest that this issue has been addressed in the Tottenham AAP (policy AAP5) but not carried forward in this borough wide policy. This aspect is a key requirement of the NPPF (e.g. as expressed in paragraphs 132-135), which needs to be recognised in the context of the whole Local Plan not in specific parts (as currently	Policy should include guidance is given on how to treat issues around potential harm to the significance of heritage assets. Policy should consider open spaces that have heritage interest. Managing Haringey's	The Council considers that Policy DM 9 sets a positive framework for conserving and enhancing Haringey's heritage assets – this gives effect to, and is considered to be consistent with, the NPPF. The policy sets out key principles and requirements against which all

				<p>presented).</p> <p>In addition the policy does not consider open spaces that have heritage interest. In particular registered parks and gardens (e.g. four designated RP&G in the borough), and other open spaces that may have been identified by the London Parks and Gardens Trust (link below) and the issues that need to be considered to ensure their significance is appropriately conserved and enhanced. (web link to the LP&GT - http://www.londongardensonline.org.uk/select-borough-results.asp?Borough=Haringey&Submit=Go)</p> <p>Under part I (archaeology) we would seek to ensure all assessments are published, therefore enabling dissemination of findings to all. In addition it should be noted that with the support of the Mayor, the Greater London Archaeological Advisory Service is conducting a review of all the London Borough's Archaeological Priority Areas to ensure that they provide a consistent and up to date evidence base for Local Plans. Haringey's APAs have not been reviewed for many years so may no longer be a reliable indication of archaeological significance and potential. The review of Haringey's APAs is currently timetabled for 2022 although we would welcome funded arrangements for accelerating the service.</p> <p>Managing Haringey's Heritage Assets - Archaeology paragraph 2.75 line 8 - the word 'assessment' should be replaced with 'evaluation', and line 15-need to substituted 'archiving' with</p>	<p>Heritage Assets - Archaeology paragraph 2.75 line 8 - the word 'assessment' should be replaced with 'evaluation', and line 15-need to substituted 'archiving' with 'publication and deposition in an appropriate designated museum'. Paragraph 2.76 clarification: the Greater London Archaeological Advisory Service is part of Historic England, so 'and where appropriate' could be deleted.</p>	<p>proposals will be assessed, and the supporting text is considered to provide an appropriate level of guidance to assist with policy implementation, with clear signposting to the NPPF. The Council does not consider it necessary to repeat national policy in the Local Plan.</p> <p>Paragraphs 2.55 and 2.56 set out the local Historic Environment Record, which includes registered parks and gardens, historic green spaces and other parks and gardens. The Local Plan is clear that in applying Policy DM 9, proposals will be considered having regard to these heritage assets.</p>
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				<p>‘publication and deposition in an appropriate designated museum’.</p> <p><i>Paragraph 2.76</i> clarification: the Greater London Archaeological Advisory Service is part of Historic England, so ‘<i>and where appropriate</i>’ could be deleted.</p>		<p>The Council considers that DM 9.1 as currently worded provides scope for the publishing of assessments, however this will be further clarified in the supporting text along the lines suggested.</p> <p>Amend 2nd last sentence of paragraph 2.75 to read:</p> <p>“If it is suitably demonstrated that this is not possible, a programme of conservation will be required including satisfactory excavation and recording of remains on site along with arrangements for archiving, <u>including publication and deposition in an appropriate designated museum.</u>”</p>
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							Amend paragraph 2.76 to read: “Applicants should seek advice from, and the Council will consult, GLAAS (Greater London Authority Archaeological Service) and, where appropriate, Historic England in all applications...”
53	RDM173	DM 45	Not stated	Not stated	We would strongly suggest that this policy should seek to optimise land in town centres as oppose to maximise. By optimising you are recognising that there are other factors to consider which will influence the degree and form of the change being encouraged. In particular the capacity of heritage assets to accommodate change without causing harm to their significance. This is a challenge which is likely to occur in the Borough’s town centres, where there is a greater likelihood of heritage assets being present. This balanced approach reflects the NPPF’s principles of delivering sustainable development.	Policy should require land use to be optimised rather than maximised	Agreed. Change Policy DM 45 title to read: Maximising <u>Optimising</u> the Use of Town Centre Land and Floorspace Change Policy DM 45.A to read: The Council will seek to maximise <u>optimise</u> the use of land...
53	RDM174	DM 48	Not stated	Not stated	As part of the Council’s commitment and strategy for the historic environment in Haringey, we would	Identify Heritage assets as	The use of planning obligations must, in

					strongly suggest that heritage assets are identified as a potential beneficiary from s106. This could include infrastructure structures and buildings that contain heritage interest or are covered by heritage designation.	potential beneficiary of s106	<p>every instance meet the legal tests –</p> <p>(a) necessary to make the development acceptable in planning terms;</p> <p>(b) directly related to the development;</p> <p>and</p> <p>(c) fairly and reasonably related in scale and kind to the development.</p> <p>It is difficult to see how heritage assets could be potential beneficiaries of s106 unless directly affected by a planning application and, then, necessary to make the development proposal acceptable.</p> <p>No change.</p>
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53	RDM175	DM 50	Not stated	Not stated	It should be noted that many public houses are of heritage interest and may be recognised as heritage assets. In these circumstances we would seek to ensure the test for redevelopment of changes of use will take into account the potential impacts upon the significance of the heritage asset. This is point is not recognised in the policy or supporting text.	Not stated.	<p>Paragraph 7.20 of the supporting text already states that public houses may be buildings of historic interest or heritage assets.</p> <p>Policy DM 9 provides appropriate consideration of the impact of proposals on the significance of heritage assets, where relevant. The Council does not consider it necessary to repeat this policy here.</p> <p>No change.</p>
53	RDM176	DM52	Not stated	Not stated	As with the policy DM52, it should be noted that many burial spaces are of heritage interest and may be recognised as heritage assets. In these circumstances we would seek to ensure the test for re use will take into account the potential impacts upon the significance of the heritage asset (including archaeological interest). This is point is not recognised in the policy or supporting text.	Not stated.	<p>Policy DM 9 provides appropriate consideration of the impact of proposals on the significance of heritage assets, where relevant. The Council does not consider it necessary to repeat this policy here.</p>

							No change.
53	RDM177	DM 55	Not stated	Not stated	We support the inclusion of a policy that encourages the preparation of masterplans for site allocations and beyond. In the details of the policy or supporting text we would urge you to ensure that the accompanying masterplans include a thorough understanding of the historic environment, heritage assets, and their significance including setting. This baseline information of values and understanding should then be used to inform the principles of development articulated in the final masterplan. By including this aspect in the Council's expectations of masterplanning , would help align the policy with the NPPF and in particular paragraphs 58-61, and its reference to responding to local character and history, reinforcing local distinctiveness, and addressing integration of new developments with the historic environment.	In the details of the policy or supporting text we would urge you to ensure that the accompanying masterplans include a thorough understanding of the historic environment, heritage assets, and their significance including setting.	Policy DM 55 sets out principles for regeneration and masterplanning to ensure delivery of the spatial strategy. Whilst recognising that the application of this policy will be important to ensure due consideration of the historic environment, the Council does not consider it appropriate to list specific requirements in the main policy text, where these are provided elsewhere in the Local Plan. No change.

Respondent 54: Page Green Residents Association

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
54	RDM178	DM 16/ Topic: Restricted Conversion	No	No	(We were just about to submit this Pre-Submission consultation at 4:45pm, when we pressed the back button to check on the previous page, and the whole of our	Under Table B: Sets of Alternatives That Have Been the Focus of	Policy DM 16 (Residential Conversions) has been set recognising

		Areas/ HMOs (unsure of the number)			consultation submission went blank. So we contacted Mercy in Planning and she said that, although it was after 5pm we could resubmit. We are now having to rewrite our submission). We are opposed to Option 1: 'Restricted conversion area'. We strongly support Option 2: 'No restricted conversion areas'. (4a) Not Legally Compliant 1, The adoption of Option 1, 'Restricted conversion area' is not compliant with the Statement of Community Involvement, as the Council has not adequately consulted with residents as to their adoption of this Option. Page Green residents have made it clear to Planning and to the local Tottenham Green councillors that they do not want a restricted conversion area, "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. (Let us point out here that these terrible conditions have not once been tackled by Haringey Planning Enforcement without enormous pressure by local residents, who have sometimes had to	Appraisal. We are opposed to Option 1: 'Restricted conversion area'. We strongly support Option 2: 'No restricted conversion areas'. *To make Option 2 more compliant with Statement of Community Involvement criteria, we suggest that this option be open to neighbourhood referendum as was the Article 4 Direction on HMOs. Legality 1. Option 2 is compliant with Statement of Community Involvement as it is based on resident and councillor feedback and experience. 2. It is sustainable as it will improve the social, economic and environmental outlook of the	the cumulative adverse impact that conversions have had in parts of the Borough, as set out in paragraph 3.35, along with the need to secure a mix of housing types and tenures in delivering the spatial strategy for the Borough. Further, monitoring information indicates that a greater proportion of 1 and 2 bedroom units are being delivered compared to larger and family size units. In light of the above, the Council considers the approach is an appropriate response to maintaining a supply of family sized bedroom units in identified areas, recognising the Local Plan is not reliant on housing conversions to meet its strategic housing target. The restricted
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				<p>resort to contacting national news outlets. And now Haringey Council proposes to continue this situation!) 2. Option 1 does not conform generally with regional policy as set out in the London Plan. Regional policy supports home ownership. Option 1 will make home ownership less possible. Furthermore, In SA of the Site Allocation DPD, Housing (page 14) it states, Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%). Option 2, 'No restriction of conversion' supports conversion into flats of big homes, and therefore, will facilitate not only homeownership but more affordable housing whilst Option 1 supports family homes becoming HMOs. 4. It is not in line with Haringey's Sustainable Community because Option 1, which restricts conversion, and therefore, encourages large houses being brought by developers and turned into HMOs. 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 are running our neighbourhoods down in every way. On the other hand, residents living in flats, which were converted from houses, are much-appreciated members of our</p>	<p>community, by supporting home ownership and community coherence and is a buffer against drugs, prostitution and exploitation 3. It supports the national policy by supporting home ownership and affordable housing. Soundness 1. Option 2 is justified as it is an option based on sound resident evidence and evidence that can also be supported by Haringey Planning Enforcement records. 2. It is an appropriate alternative strategy to Option 2 because it does more good than harm, whereas Option 1 does the opposite. 3. Option 2 is effective and deliverable as it is</p>	<p>conversion policy will be applied alongside Policy DM 17, which will ensure appropriate control over the development of Houses in Multiple Occupation, which has been set recognising local issues experienced as a result of the proliferation of this type of use. However, the enforcement of HMOs, is outside the scope of the Local Plan.</p> <p>The policy is considered to be justified, having been subject to and supported by outcomes of a sustainability appraisal, in which reasonable alternatives were considered and assessed.</p> <p>The Council considers that it has carried out public consultation in</p>
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				<p>community. We have found flat owners are far more responsible than HMOs transient population and, moreover, are as home owners, eager to contribute to the well being of our neighbourhood. Therefore, conversions support sustainability, whereas the availability of large houses for landlords to turn into HMOs does not support sustainability. 4b. Not Sound 1. Option 1 is not supported by evidence. The Council response to our original submission to the Local Plan states, " 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 against a 'no restriction approach' as part of the sustainability appraisal process in considering reasonable policy alternatives. The appraisal has concluded that there are likely positive effects associated with the proposed policy." We residents have never seen this sustainability appraisal. So we have had no chance to evaluate it. Thus the evidence that the Council puts forward is not evidence at all. Moreover, local Tottenham Green councillors can attest to the evidence that large houses, brought by landlords to create HMOs, create a large part of the planning problems in our area, whereas, houses created into flats certainly do not. 2. Option 1, 'Restricted conversion</p>	<p>not dependent on Haringey Enforcement. 4. It is flexible, as owners are not forced to convert, whereas, in Option 1 owners are not allowed to convert, even if they wish to. 5. It is consistent with national policy in that it supports home ownership.</p>	<p>line with its adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>No change</p>
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					<p>area' is not the most appropriate strategy. Option 2 is the most appropriate strategy. 3. Options 1 is not deliverable. The Council response to our initial submission is that "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 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." First, despite the Article 4 Direction in November 2013, there have been an increasing amount of problem-generating HMOs in our neighbourhood. So the Council has demonstrated that it is not able to effectively deliver enforcement or even monitor this Directive. Secondly, how can the Council say that enforcement is outside the scope of the Local Plan, when deliverability and evidence is one of the</p>		
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					criteria of this plan? 4. Option 1 is not flexible in that it does not take a case-by-case position. Instead it just restricts without adequate evidence. 5. This restriction of conversion works against the National Policy to encourage home ownership because it will disallow conversion into smaller properties, which would be more affordable thus facilitating home ownership.		
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Appendix J – Responses to the Pre-Submission Development Management Policies DPD Consultation – Document Order

Introduction

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
27	RDM116	Paragraph 1.22 / Paragraph 3.17	Not Stated	Not Stated	Point 1 Paragraph 1.22 States It is intended that the policies contained within this document are to be applied borough-wide unless specified otherwise in an Area Action Plan. However Para 3.17 States that "The Council considers that there are exceptional circumstances for residential extensions in South Tottenham that merit further considerations. Proposals will therefore be expected to have regard to the South Tottenham House Extensions Supplementary Planning Document. Paragraph 3.17 provides for a special treatment of a particular locality and in its operation, special treatment of a particular community, it is therefore in conflict with paragraph 1.22 and possibly with equalities legislation.	Haringey to identify the outcome of all relevant impact assessments on all documents referenced in the plan. Haringey to explain why the South Tottenham House Extensions Supplementary Planning Document applies to the South Tottenham area only and not to the rest of the Borough	<p>Equality Impact Assessments (EqIA) are carried out for all Development Plan Documents, in line with regulations.</p> <p>The EqIA and Health Impact Assessments were integrated into the Sustainability Appraisals for the Local Plan Documents. This is available to view on the Local Plan webpages.</p> <p>An EqIA was also carried out for the original version of the South Tottenham House Extensions SPD. (This can be accessed on the Council's website) The Council considered it appropriate to refer to the original EqIA and the Local Plan Strategic Policies EqIA to support the</p>

					Point 2 Impact Assessments: Although the document states that Impact Assessments as described in paragraphs 1.14 to 1.17 have been carried out on the Plan. It appears that documents that have been referenced in the Plan including SPD's may not be subject to impact assessments. Impact assessments should be shown to have been carried out on all documents that form part of or are referenced in the plan		preparation of the review of the House Extensions SPD. The purpose and role of the SPD is clearly set out in the documents, this can be accessed on the Council's website.
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Policy DM1 Delivering High Quality Design (Haringey Development Charter)

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
1	RDM1	DM1/ 2.1	No	Not Stated	Given the previous representations about light, the current amendment does not address the action in the Council's response to provide requirements that should be adhered to, and as such remains ambiguous.	Link the two sentences in paragraph 2.10 to specify that proposals will be assessed for compliance with The Building Research Establishment (BRE) guidance on Site Layout Planning for Daylight and Sunlight: a guide to good practice.	Disagree. The draft policy in the Preferred Option document has been amended to clarify requirements on protection of amenity (including for sunlight and daylight) and to signpost relevant BRE guidance, which all proposals will be expected to have regard to as a material

							consideration; however such guidance does not constitute a policy requirement, which linking the sentences as suggested, would seek to imply. The policy provides sufficient flexibility to consider proposals having regard to individual site circumstances. No change.
2	RDM2	DM 1	No	Yes	Development Management Plan Policy DM1: Privacy and amenity (D) (b) Privacy and protection from overlooking. The earlier policy specified distances such as a 20m separation distance between 1st floor habitable room windows, with an additional 10m for each additional floor. I am concerned at the potentially significantly- damaging effect of the 'blanket' removal of these distances. I appreciate that the application of these minimum distances to new developments could make it impossible to group taller buildings as part of a wished-for landscape (eg Tottenham Hale Village), and could affect viability. I recognise that such grouping of new taller buildings has a potentially crucial role in helping create a 'good'	Development Management Plan Policy DM1: Privacy and amenity (D) (b) Privacy and protection from overlooking. I consider that the policies protecting privacy and against overlooking should be re-framed so that distances are again specified where character is of lower-rise. In addition, that there should be specific policy/ies to assist the council as planning authority to define the future landscape of the	Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances. Policy DM 1 will be considered alongside other policies which seek to ensure that

					landscape in which there are areas of different character. However, the blanket removal of these distances could make possible new developments in areas of existing, older housing stock, including in Conservation Areas, that could severely damage character. In potentially allowing tall developments close alongside lower-rise existing housing stock, the policy without distances could work against the aim of grouping taller buildings. It could also work against the aims expressed in other policies that are designed to conserve character, particularly in Conservation Areas. It could be said that the policies are internally-inconsistent.	borough in relation to tall buildings as part of the publicly-defined policy base rather than a site-by-site response to planning applications. The aim of these changes is better planning of the borough's landscapes and character, and policy that is clearer and better understood by both the public and developers.	proposals positively respond to local character. The Council considers that the Local Plan sets out a positive framework for managing landscapes, townscapes and views, including in relation to tall and taller buildings, through the DM DPD policies, including DM 5 (Locally Significant Views and Vistas) and DM 6 (Building Heights), which are supported by local evidence. No change.
3	RDM3	DM 1 Section D paragraph b	No	Not Stated	I consider the Policy on Privacy and Overlooking to be unsound for the following reasons: 1) It is too vague and reliant on the variable subjective responses of individual planning officers. It will therefore lead to inconsistency in decision-making, and undermine the community's confidence in the planning process. 2) Site cramming and excessive density will result if no prescriptive separation distances are included. This is evidenced by the Connaught House development (HGY/2014/1973 &	Policy DM3 of the Draft Development Management DPD (February 2015) should be reinstated, in order to ensure that the Policy on Privacy and Overlooking is clear and can be applied with consistency. Policy DM1 Section D b should therefore be revised as follows: All dwellings should provide a reasonable	Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity

				<p>HGY/2015/1956), which has a density of 305 hr/ha</p> <p>3) Planning approval will be given for developments which do not comply with separation distances as previously included in Haringey's Housing SPD (revoked November 2014) and in the Draft Development Management DPD (February 2015). This is evidenced by the Connaught House development, where a four-storey block of flats comes within 16m of an adjacent two-storey house (HGY/2014/1973).</p> <p>4) Angled windows and obscure glazing are an unacceptable alternative to a robust and clear policy on separation distances. See planning inspector's report HGY/2005/0979</p> <p>5) Policy DM3 in the Draft Development DPD was withdrawn following responses of six planning consultants/agents on behalf of developers. I do not consider the decision to drop this policy is sound:-</p> <p>a) It does not reflect the wishes of the local community: almost 90% of respondents and more than 99.5% of those consulted had no objection. Its exclusion at the behest of a few developers conflicts with the stated policy in the Local Plan that people should be put at the heart of change.</p> <p>b) No evidence has been</p>	<p>amount of privacy to their residents and neighbouring properties to avoid overlooking and loss of privacy detrimental to the amenity of neighbouring residents and the residents of the development, including a distance of no less than 20m between facing 1st floor habitable room windows of neighbouring homes. New homes should be designed so they and neighbouring existing homes have 1st floor (2nd storey) windows to habitable rooms that do not face windows of habitable rooms of another dwelling that is less than 20m away. Care should be taken to avoid any ground floor windows being overlooked although there will normally be natural screening (garden walls and fences) that mean this is not possible. There</p>	<p>whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change.</p>
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					submitted to demonstrate that development is undeliverable with a prescriptive distances policy	should be an additional 10m for each additional floor; a minimum of 30m between a 2nd floor window and any window that could be overlooked on the ground, 1st or 2nd floor, 40m between a 3rd floor window and any window that could be overlooked on the ground, 1st, 2nd or 3rd floor and so on, up to a separation of 60m (no greater separation is considered necessary).	
4	RDM5	DM 1	Not stated	Not stated	I wish to comment on changes made to the draft plan which was the subject of consultation last year. The draft policy prescribed separation distances for a new development of at least 20m at first floor level for facing habitable rooms, with an additional 10m for each additional floor. This provision is no longer included in the pre-submission version. The evidence behind this withdrawal is not stated. It seems to me clear that some such restriction is required to protect the privacy and amenity of neighbours. It may be argued that the general provision in DM1 to relate positively to their locality	In my view, this experience shows that the only satisfactory strategy to ensure that overcrowding does not occur is to prescribe general limits on separation distances.	Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual

					<p>having regard to building heights and form, scale and massing prevailing round the site suffices, but this leaves a wide scope to subjective judgement. With the best will in the world, planning officers and committees may find it difficult to defend any particular proposal against attempts by developers with a financial interest in cramming buildings together as tightly as possible unless there is an objective criterion for judging the issue. To provide evidence in support of my comment, the planning application to redevelop Connaught House off Connaught Gardens N10 (HGY/2013/2421) was approved even though the new four storey block of flats is less than 20 metres from neighbouring properties. The building is now being constructed and it is already apparent that this is a substantial reduction in amenity for neighbours.</p>		<p>site circumstances.</p> <p>Prior decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>
5	RDM7	DM 1	Not Stated	Not Stated	<p>I wish to comment on Policy DM1. The policy DM1 is too loosely framed. The word "appropriate" is far too indefinite and open to debate as to what is and what is not "appropriate".</p> <p>The deleted policy DM3 was much more helpful to residents concerning overlooking and privacy</p>	No response given	<p>Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council</p>

							considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.
							No change.
6	RDM8	DM 1	Not Stated	Not Stated	<p>The Council is now relying on its amenity policy (DM1 section D on page 11) to control overlooking, but the weakness in this policy is clearly demonstrated by the recent approval for the development of the Connaught House site. It is too subjective and too dependent on how developers and planning officers assess amenity. According to the withdrawn prescriptive distance policy, there should be at least 40m distance between facing habitable rooms for four-storey buildings.</p> <p>There is nothing like this distance on any side of flats development, in particular Teresa Walk. Likewise the four-storey houses on the other part of the site are too close to houses in Connaught Gardens, their rear windows being some 25m apart. The result is a development which is too high and overbearing</p>	<p>I would like to request the re-instatement of the prescriptive distances policy, and the addition of an amendment to specify building heights on backlands site, to ensure that future developments do not compromise the privacy and amenity of neighbouring properties.</p>	<p>Disagree. The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>The Council does not consider it necessary to include additional criteria to specify building heights</p>

					and completely out of character in this neighbourhood.		<p>on backland sites within DM 1. This matter is dealt with through Policies DM 6 and DM 7.</p> <p>Prior decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>
7	RDM10	DM 1	Not stated	Not stated	It is of considerable concern that the Local Plan now excludes the separation of distances policy for residential buildings and that the proposed Backlands Policy is not prescriptive on heights of buildings.	I would urge Haringey to reinstate the distances policy and to amend the Backlands Policy so that future developments do not adversely affect the privacy and amenity of neighbouring properties.	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change.</p>
8	RDM12	DM 1	Not stated	Not stated	Some proposed changes in the Plan are unacceptable. In particular, the	No response given	Disagree. The specific separation distances were

					<p>abandonment of the previous precise distances between buildings that would minimise intrusive overlooking should be restored. The suggested alternative of a judgment on amenity is flawed. Anything that depends on judgment is bound to introduce fuzziness. Inevitably, developers will argue for a lesser distance than the people who would live there and be overlooked. In arguments of this sort the developers will always win, if necessary taking the case to appeal. The Council cannot afford the cost of prolonged litigation and has to give up sooner than the developer. There is no argument when the distance is stated in metres. The same considerations apply to the height of new developments.</p>		<p>a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is the most appropriate approach and sufficiently robust to ensure the protection of amenity whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>No change.</p>
9	RDM13	DM 1	Not Stated	Not Stated	<p>The plan does not reassure residents that their interests will be protected at a time when local land value is high, making it profitable for speculators to invest in over-development in order to reap a high return.</p> <p>Favoured developments are for houses & flats for sale, closely packed with high densities; these will not be available to ordinary workers. Haringey needs the</p>	<p>The plan should include clear regulations to assist good practice in Haringey planning committees. The regulations should be clear and include specifications that developers are not allowed to ignore.</p>	<p>The introduction of planning regulations is outside the scope of the Local Plan.</p> <p>Haringey's Local Plan includes policies to secure provision for a range of housing types and tenures in order to meet objectively assessed needs. Development proposals will be assessed</p>

				<p>workers that are being priced out of accommodation in the borough.</p> <p>Even the very weak obligation to build 'affordable' homes is frequently dodged, as the policy set out on in DM13 page 28 does not apply to sites with fewer than 10 additional homes.</p> <p>Too few rented homes are provided and the term 'affordable' is based on local market prices rather than on local average earnings. Most building taking place will not be available to key workers, or low paid workers.</p> <p>The Development Plan should, within its powers, set out regulations that will make sure that developments are not the slums of the future. The regulations should be clear and include specifications that developers are not allowed to ignore.</p> <p>Planning committees should be discouraged from setting aside recommended separation distances, heights, basement depths and densities. Building Control also needs to be robust.</p> <p>Current practice is that planning</p>		<p>having regard to the Council's adopted Local Plan policies, the London Plan and relevant material considerations such as supplementary guidance like the London Housing Design Guide.</p> <p>No change.</p>
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					<p>guidance is vague. The vague guidelines make it possible that applicants for planning permission could appeal a rejection and win compensation. Councillors serving on Planning Committees are thus prevented from judging correctly whether the application damages the amenity of residents.</p> <p>Also, the process does not enable them to assess the overall and accumulative impact of a succession of developments upon the local environment.</p>		
9	RDM14	DM 1	Not Stated	Not Stated	<p>Specifications in earlier policies should not be weakened.</p> <p>Separation distances for residential buildings were specified in the Housing SPD (revoked November 2014) and included in consultations last year.</p> <p>The prescribed separation distances were at least 20m at first floor level for facing habitable rooms, with an additional 10m for each additional floor, implying that for four-storey buildings the separation distances should be 40m.</p> <p>It was developers that requested withdrawal on this policy. If this policy is not restored future crowding of residential homes can</p>	<p>Please include specified minimum distances</p>	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers the policy is appropriate and sufficiently robust to ensure the protection of amenity and privacy whilst providing flexibility to consider proposals having regard to individual site circumstances.</p> <p>Previous decisions on</p>

					<p>easily be imagined. Residents not developers should set down minimal standards.</p> <p>The earlier stipulated distances have been signally flouted in a development given planning permission near my house. [5-9 Connaught House HGY/2015/1956]</p>		<p>proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>
9	RDM15	DM 1 Page 11 bullet D	Not Stated	Not Stated	<p>It is not sufficient to make vague requirements relating to overlooking and privacy. The aspirations expressed in 2.9 cannot be achieved without recommended distances.</p> <p>Building heights are mentioned in DM6, but in relation to those areas where very high buildings are to be allowed. DM6 Page 17 Policy A says</p> <p>For all development proposals, the Council expects building heights to be of an appropriate scale which respond positively to the site's surroundings, the local context, and the need to achieve a high standard of design in accordance with Policy DM1</p> <p>This should also apply to backland developments, but there are no specifications on maximum heights allowed for new build that could</p>	<p>Please insert that, in general, within residential settings, new buildings should not exceed the height of existing homes.</p>	<p>Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively.</p> <p>Policy DM6A on building heights does apply to backland development proposals that would fall under Policy DM7. There is no need to repeat policy requirements throughout the document.</p> <p>No change.</p>

					affect how the aspirations expressed in section DM1 could be achieved.		
10	RDM23	DM 1	No	Not stated	<p>The above policies are too loosely framed and not supplemented in subsequent policies to ensure the public will have confidence in planning decisions. DM3 (January 2014 version) provided clarity and should be reinstated to ensure confidence in decision-making which may otherwise prove inconsistent, undermining the credibility of the planning process. Acceptable distances should take into account land gradients relative to existing buildings.</p> <p>We note that DM3 (Jan 2015 version) was dropped following responses from a small number of agents responding to the Jan 2015 consultation on behalf of their clients with vested interests in particular sites and with no evidence to support their comments. We do not therefore consider the decision to drop DM3 was sound. Lack of response in support of DM3 should not lead to the assumption that it was generally regarded as unsound.</p> <p>Are neighbours in the opinion of the</p>	Not stated specifically.	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers Policy DM1 is appropriate and sufficiently robust to ensure the protection of amenity and privacy having regard to individual site circumstances.</p> <p>No change.</p>

					Examiner better protected by the change from 'reasonable' to 'appropriate'?		
10	RDM24	DM 1	No	Not stated	It should be made clear whether this policy takes precedence over policies relating to conservation areas	Not stated specifically.	Policy DM 1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character, including historic character and the setting of heritage assets. No change.
11	RDM41	DM 1 A(a), A(b), B(a), B(b), D(b)	No	Not stated	The above policies are too loosely framed and not supplemented in subsequent policies to ensure the public will have confidence in planning decisions. DM3 (January 2014 version) should be reinstated to ensure confidence in decision-making which may otherwise prove inconsistent, undermining the credibility of the planning process. We note that DM3 (Jan 2015 version) was dropped following responses from a small number of agents responding to the Jan 2015 consultation on behalf of their clients with vested interests in particular sites. We do not therefore consider the decision to drop DM3 was sound. Lack of response in support of DM3 should not lead to	Not stated specifically.	The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers Policy DM1 is appropriate and sufficiently robust to ensure the protection of amenity and privacy having regard to individual site circumstances. No change.

					the assumption that it was generally regarded as unsound.		
11	RDM42	DM 1 (A&B)	No	Not stated		It should be made clear whether this policy takes precedence over policies relating to conservation areas	Policy DM 1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character, including historic character and the setting of heritage assets. No change.
12	RDM60	DM1	Yes	Yes	THFC support the incorporation of policy DM3: 'Privacy and protection from overlooking' from the Development Management Policies Preferred Option Consultation (February 2015) into policy DM1 and the removal of prescribed distances between neighbouring homes. This is consistent with the Mayor's Housing SPG (para. 2.3.30) which recognises the unnecessary restrictions that can be placed on development through using minimum separation distances.	Not stated	Support noted
13	RDM63	DM 1	Yes	Not stated	Berkeley Homes support the proposed change to the policy (previous Policy DM3) which removes the arbitrary rule of 20m separation between properties which is restrictive, ineffective and is not justified in a central London context.	No response given.	Support noted.

15	RDM71	DM 1	No	Yes	<p>Broadly NLWA considers that this policy is sound and the Authority notes the positive changes to this policy since the previous draft which make it more explicit. However, NLWA considers that the policy should recognise that design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development. Paragraph A is not explicit in terms of recognising that the design requirements may be usefully reflective of the nature of the development. For instance, NLWA considers that for industrial employment facilities set within designated employment and industrial areas greater emphasis should be placed on supporting their potential to generate employment and ensuring that they do not give rise to adverse local environmental impacts. Good functional design will be appropriate in such locations and the policy should applied flexibly and should not be used to impose onerous and costly requirements on such developments.</p> <p>Specifically the design of a new local waste facility should not be subject to the same design</p>	<p>The Authority considers that paragraph A should be amended to make this policy workable in practice, as follows, (with the proposed amendments in bold italics):</p> <p><u>Haringey Development Charter</u> A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area, <i>however design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development.</i> The Council will support design-led development proposals which meet the following criteria: a Relate positively to neighbouring</p>	<p>The current policy wording is clear that all proposals, irrespective of land use, will be expected to deliver high quality design having regard to the local context and setting, and further details in respect of policy implementation are set out in the supporting text. The Council considers that the policy is sufficiently flexible to consider proposals having regard to individual site circumstances and the nature of development.</p> <p>No change.</p>
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					<p>requirements as for example the redevelopment of an iconic building in the borough. Waste facilities in particular should be recognised as essential community infrastructure ultimately funded by local taxpayers, where the emphasis should in most cases be on a functional design which protects amenity and the local environment rather than on “iconic” but typically more costly schemes.</p>	<p>structures, new or old, to create a harmonious whole; b Make a positive contribution to a place, improving the character and quality of an area <i>but additionally reflecting the nature of the development</i>; c Confidently address feedback from local consultation; d Demonstrate how the quality of the development will be secured when it is built; and e Are inclusive and incorporate sustainable design and construction principles.</p>	
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Policy DM2 Accessible and Safe Environments

No comments received

Policy DM3 Public Realm

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
11	RDM46	Para	No	Not stated	Satellite dishes have an adverse	Not stated	This paragraph highlights

		2.26			effect on Conservation Areas where located in a position where they are visible from the CA. Para 2.26 suggests that policy is flexible on this point which would be unacceptable	specifically.	the requirement for the need to assess proposals for telecommunications in CAs against DM9 as well as DM3. No change.
16	RDM73	DM 3 (B)	No	Not stated	Criterion B requires the management of the new privately owned public spaces, including their use and public access, will need to be agreed by Council. We <i>object</i> to this, as it is onerous to require the private estate management matters to be agreed by the Council, and it goes beyond the role of planning policy.	We therefore request that the second sentence of Criterion B is deleted.	Disagree. In requiring the provision of new privately owned public space within new development, the Council has an obligation to ensure such space is maintained over the long-term, in terms of use, access and quality. This can only be ensured through agreement to the proposed management of these spaces. No change
17	RDM83	DM 3	Not Stated	Not Stated	This policy seeks to deliver high quality public realm that is appropriately managed and maintained. Whilst this aspiration is supported, the policy as drafted requires the provision of public art and public access to open spaces within a development and their long-term retention, management and	In light of paragraph 173, we consider that the policy should be reworded to acknowledge that the provision, management and maintenance of public art and	Disagree. The policy seeks to ensure that appropriate consideration is given to the management and maintenance of public art and privately owned public spaces within developments. This is unlike to involve a

					<p>maintenance. This would be a notable cost that could impact on development viability.</p> <p>NPPF paragraph 173 states that developments ‘should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened’.</p>	<p>public access to spaces will be considered in the context of development viability and balanced against other priorities such as key infrastructure.</p>	<p>development cost, as such costs would typically fall to occupiers of the development through, for example, the body corporation fees or rents. However, such maintenance costs could be minimised through appropriate design and materials, as well as suitable management arrangements.</p> <p>No change</p>
18	RDM92	DM 3 (C) DM 8 (B)	Yes	Not Stated	<p>The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).</p> <p>We commented on earlier drafts of this document in May 2010, March 2013 and February 2015. We are pleased that most of our</p>	Not stated	Confirmation that the respondent considers the policies to be sound is welcomed.

					<p>comments have been taken into account in the production of this latest draft.</p> <p>We consider Policy DM3(C) to be sound. We also consider Policy DM8(B) to be sound.</p>		
52	RDM168	DM 3 Para 2.16	Not Stated	Not Stated	<p>Public Realm - Advertisements – Welcome the reference in paragraph 2.16 – although the text should be corrected to “<u>Transport for London Road Network</u>” and the date of the TfL Streetscape Guidance is 2015 not 2009. TfL has a set criteria of requirements that it imposes on advertisement on the Transport for London Road Network (TLRN), particularly illuminated/electronic signs. This requires a number of conditions to be imposed in order to mitigate any impact on safety/driver distraction, details of these can be provided if required.</p>	<p>The text should be corrected to “<u>Transport for London Road Network</u>” and the date of the TfL Streetscape Guidance is 2015 not 2009</p>	<p>Noted. Amend last sentence in paragraph 2.16 to read:</p> <p>Transport for London’s (TfL) Streetscape Guidance (2009) (2015) provides guidance for use on TfL roads <u>the Transport for London Road Network (TLRN)</u>.</p>

Policy DM4 Provision and Design of Waste Management Facilities

No comments received

Policy DM5 Locally Significant Views and Vistas

ID	Rep ID	Policy / Para /	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
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		Figure					
19	RDM95	DM 5	No	Not Stated	The APPCAAC welcomes the recognition given to the significance of viewing corridors and locally important views. However, there is an omission with regard to the need to protect views within and from conservation areas	The APPCAAC recommends an additional point E under Policy DM5 to show: “The Council will protect Views into, within and from Conservation Areas”	As set out at 2.35, specific views from within or to conservations areas are identified in the Conservation Area Appraisals and Management Plans. These identified views are not protected Locally Significant Views but are a material consideration where a development proposal may affect the identified view. No change.
19	RDM96	DM 5	No	Not Stated	We also note that the Map 2.3 on page 16 showing Locally Significant Views is deficient and needs to be augmented. Similarly, in the Site Allocations Development Plan, Table 5: Local Views on page 162 needs to be augmented. The APPCAAC has already made recommendations on this, which seem not to have been taken into account	Augment Map and Table as recommended.	It is recognised that the map is unclear and not aligned with the schedule of views in Table 5 of the Site Allocations and Appendix A of DM DPD. This will be amended for clarity and accuracy. However, in line with Council’s response above the map, nor corresponding schedules will not be amended to incorporate all views into, within and from CAs. No change
20	RDM97	DM 5	No	Not Stated	The criteria under parts A (a-c) within Policy DM5 are too onerous and thus are not effective considered against other development plan policies, failing this soundness test.	The wording under criteria A (a-c) of Policy DM5 should be reworded or removed in order to be considered effective.	The Council considers the wording at DM5A(a-c) to be effective and not onerous, and notes that no detailed evidence has been provided to challenge this assertion. While provision is made for more intensive development within Growth Area, development

					<p>Furthermore, part A(c) requires proposals to meet the requirements of the Council's Tall Buildings and Views Supplementary Planning Document (SPD), which does not yet exist. As such it is difficult to assess the appropriateness of this requirement and therefore is not based on robust evidence, failing the 'justified' policy test.</p> <p>Please refer to the accompanying cover letter (part (d) (i)).</p>	<p>It may also be more appropriate for proposals to demonstrate how development proposals have been informed by that future SPD, rather than slavishly meet the requirements of a supplementary planning document.</p>	<p>proposals within Growth Areas should still take account of protected views. There is not considered to be a policy conflict.</p> <p>No change</p> <p>Agreed. A minor amendment is proposed to DM5A(c) to delete the wording 'Be consistent with' and replace this with 'Have regard to'.</p>
53	RDM17 1	DM 5	Not stated	Not stated	<p>Paragraph 2.35 should be amended to include both Conservation Area Management Plans and Appraisals, as a source of views that proposals need to considered.</p>	<p>Paragraph 2.35 should be amended to include both Conservation Area Management Plans and Appraisals, as a source of views that proposals need to considered.</p>	<p>Paragraph 2.35 amended to read:</p> <p>There are a number of views included in the Council's Conservation Area Management Plans and Appraisals that proposals should have regard to in order to positively respond to local character.</p>
51	RDM15 9	DM 5 & DM 6	Not Stated	Not Stated	<p>Locally Significant Views and Vistas and Building Heights</p> <p>There appears to be significant overlap between the locally significant views and the locations identified</p>	<p>The borough should consider providing more detail in policy DM5 and DM6 as to what the views are aiming to</p>	<p>Policy DM5 and its associated table should be read in conjunction with the Schedule of Locally Significant Views included as Appendix A of the DM DPD, which provides further details in this respect – for example, 'viewing</p>

					as being suitable for tall buildings. The document states that a Tall Buildings and Views Supplementary Planning Document will be produced. However, to ensure a robust approach, the borough should consider providing more detail in policy DM5 and DM6 as to what the views are aiming to preserve. Further detail should also be provided in the Wood Green Area Action Plan (AAP).	preserve. Further detail should also be provided in the Wood Green Area Action Plan (AAP).	places’ and ‘assessment points’, along with types of view (i.e. panorama, linear, townscape). To assist with policy implementation, the Council will prepare a Tall Buildings and View SPG. The Council will also give consideration to further details in the Wood Green AAP.
21	RDM10 4	Figure 2.1 DM 5	No	Yes	We note that Figure 2.1 should be read in conjunction with Appendix A (Schedule of Locally Significant Views). However, the numbers referencing the views on Figure 2.1 do not completely correspond with the views numbered and listed in Appendix A. This is confusing and not effective.	The views within Figure 2.2 and Appendix A should be referenced correctly so that they align and the plan is effective.	Noted. It is recognised that the map is unclear and not aligned with the schedule of views. A minor modification is proposed to amend the figure for clarity and accuracy.
22	RDM10 6	DM 5 & Appendix A	Not Stated	Not Stated	Policy DM5: Locally Significant Views and Vistas illustrated by Figure 2.1 Haringey Views (as below) and Appendix A Table 2 Schedule of Locally Significant Views seeks protection of local views across the borough. The	Not specifically stated	It is recognised that the map is unclear and not aligned with the schedule of views in Table 5 of the Site Allocations and Appendix A of DM DPD. A minor modification is proposed to amend Figure 2.1 for clarity and accuracy. An additional map will also be

				<p>basis of these views arises from the 1998 UDP and 2014 Urban Characterisation Study (assumed to be the 2015 Study).</p> <p>Figure 2.1 does not corresponded to the indexation of Appendix A and should be rectified, moreover, the viewpoints are not clearly cross referenced with the Urban Character Study (UCS) (2015) and the Tall Buildings Locations Validation Study (2015) to define the relevance and weighting of the viewpoints which should be addressed.</p> <p>We are concerned that the requirements of the policy may result in inevitable conflict with the development plan policy objectives for the Growth Area and therefore may not be technically 'effective'. As currently drafted the policy may fail for Wood Green.</p> <p>Haringey Council are planning to support a minimum of 6,000 new homes in Wood Green and a</p>		<p>included showing the relationship between the significant views and tall building locations. This will aid assessment of proposals for tall buildings and will form part of the Tall Buildings and Views SPD.</p>
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				<p>significant increase in employment generating floorspace. Clarendon Gas Works has permission for tall buildings, is part of the tall buildings cluster at the junction of Western and Coburg Roads, and lies adjacent to current tall building allocations. The Issue and Options Wood Green AAP confirms that “The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device”.</p> <p>This approach needs to be balanced with the converging Locally Significant Linear Views (No.19, 20, 21, and 22) which cross the Wood Green Growth Area and Wood Green & Haringey Tall Building Area to Alexandra Palace. The Potential Tall Buildings Validation Study 2015 recognises that “There is potential for any</p>	
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				<p>development of tall buildings at this location (Wood Green and Heartlands) to be visible from several sensitive receptors, which will need to be considered in further detail". The Study also refers to a "height limit" within the Growth Area, which St William has concerns about, albeit the report does not recommend what this might be, or how it might be assessed. We would be concerned if proposed height limitations arose out of non-development plan documents.</p> <p>Policy DM5 (Part A (a-c)) requires proposals in the viewing corridors of the Locally Significant Views to demonstrate how the proposal enhances the viewers' ability to recognise and appreciate the landmark being viewed; makes a positive contribution to the composition of the local view; and meet the requirement of the Council's Tall Buildings and Views Supplementary Planning Document (which does not</p>		
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					yet exist). It is considered that requirements (a-c) are too onerous for key development sites in Wood Green and will not be effective, considering other development plan policies which promote development within these viewing corridors. We do not consider this wording to be effective, and it should be removed or reworded.		
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Policy DM6 Building Heights

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
12	RDM61	DM6	Yes	Yes	THFC support the amendments to Figure 2.2 to define wider Tall Building Growth Areas, which for Northumberland Park aligns with the North Tottenham Growth Area. This will allow the exact location for tall buildings to be defined through site analysis and careful design. This is also consistent with paragraph 2.48 of the Pre-submission Tottenham AAP which describes meeting the housing targets of the AAP area through higher density and well-designed taller buildings in accessible locations.	Not stated	Support noted.
13	RDM64	DM 6	Not stated	Not stated	The policy continues to state that tall buildings will only be acceptable in areas identified on Figure 2.2. It is suggested that this policy should not put a ceiling on the appropriate height of buildings in the borough. Proposals for tall buildings should be considered on their individual	The policy should be amended so that building heights are not	The policy does not prescribe building heights. It sets out a positive

					merits and the Council should not rely on an arbitrary figure	applied rigidly to each site within each area. The borough has an ambitious strategic housing target, which it rightly aims to meet and exceed. Applying onerous policies such as this will inevitably hinder the Council's delivery of housing.	framework for managing the development of tall and taller buildings in order to deliver the Borough's spatial strategy. This approach is justified by evidence, as set out in the supporting text. The Council considers that the policy is the most appropriate and sufficiently flexible to consider proposals having regard to individual site circumstances. No change.
16	RDM74	DM 6 Para 2.42	No	Not stated	Policy DM6's supporting paragraph 2.42 refers to the Urban Characterisation Study (2015) (UCS). As we commented in the previous representations, we are concerned with the recommended approach for Wood Green in this document. It recommends that heights should be greatest along the railway line (mid to high rise) stepping down to mid-rise towards the existing 2-3 storey building and terraces that line Hornsey Park Road	Not stated.	The Urban Characterisation Study is referenced in the supporting text as part of the technical evidence base

					and Mayes Road. We are concerned with this approach, as there are no development sites available or allocated along the eastern area of the railway line when compared with the Building Height Recommendation Plan on page 156 of the UCS, and the proposed site allocations for Haringey Heartland. We therefore <i>object</i> to the reference to this document unless it is updated as further work is undertaken, as evidence base for tall buildings or a material consideration in the determination of planning applications		informing and justifying the policy approach. The UCS is but one consideration in establishing the appropriate building height for broad locations and individual sites. As set out in paragraph 2.42, the Council will prepare further planning guidance on tall buildings. The Local Plan includes site allocations along the eastern area of the railway line. No change
16	RDM75	DM 6	No	Not stated	Policy DM6 (Building Heights): We <i>object</i> to Criterion B which requires proposals for taller buildings that project above the prevailing height of the surrounding area must be justified in 'community benefit' . There is no justification or explanation for requiring justification in relation to community benefit. The Growth Area is likely to include tall/taller buildings in order to intensify and increase the development capacity in order to facilitate	Not stated	As set out at paragraph 2.40, taller buildings can be prominent and visual features which affect everyone. While

					<p>growth and regeneration. As such, it is considered unnecessary and onerous to justify community benefit.</p> <p>We welcome and support the amendments made to Map 2.2 as it identifies the Wood Green Growth Area as potential locations appropriate for Tall Building, in line with the strategic objectives. As the Tall Building Validation Study (November 2015) indicates, further detailed work will be necessary including assessment of individual site that would be subject of any planning applications, as required by Criterion E. As such, the approach to define the Growth Area as potential Tall Building locations is considered appropriate.</p>		<p>good design will ensure these buildings are visually attractive, this is a requirement of all development and, therefore, further mitigation is required to justify their need.</p> <p>No change</p>
16	RDM76	DM6	No	Not Stated	<p>Sub-criterion c under Criterion C requires proposals for Tall Buildings should be consistent with the Council's Tall Buildings and Views Supplementary Planning Document ('SPD'). The NPPF defines SPDs as documents which add further detail to the policies in the Local Plan and can be used to provide further guidance for development on specific sites or on particular issues such as design. The NPPF further advises that SPDs should be used where they can help applicants make successful applications. It makes it clear that it is not part of the Development plan. As such documents will not go through the examination process, we are concerned that the criterion requires proposals to be "consistent with" yet to be prepared SPD, for which no clarification is provided as to what additional guidance will cover over and above the requirements set out in the DM in relation to tall buildings, key views and design. In order to ensure that such a SPD is not used to add unnecessary and unjustified requirements for proposals for tall buildings.</p>	<p>It is considered that the criterion is amended to state: <i>"have regard to be consistent with the Council's Tall Buildings and Views Supplementary Planning Document."</i></p>	<p>Agreed. The suggested changes will be included in a schedule of proposed minor modifications.</p>

17	RDM84	DM 6	Not Stated	Not Stated	<p>Policy DM6 seeks to deliver the Council’s objectives for ‘tall’ and ‘taller’ buildings.</p> <p>Workspace welcomes the identification of Wood Green as an appropriate location for tall buildings and the helpful definition of ‘tall’ and ‘taller’ buildings (paragraph 2.39). Furthermore, Workspace supports the detail of the draft policy in respect of tall buildings being ‘a wayfinder or marker’ (C.a.i) and considers that it would be appropriate to also add public spaces/ urban squares in to the wording.</p> <p>There are, however two elements of the draft policy to which Workspace objects:</p> <p>Part B of the draft policy states that taller buildings (and as required by Part C, tall buildings) ‘must be justified in community benefit as well as urban design terms’. If a tall or taller building is acceptable in urban design terms there should be no need to mitigate its impact by demonstrating community benefits or through other means. In heritage terms, the NPPF requires public benefits to be demonstrated if harm is being caused to the significance of a heritage asset (see paragraphs 133 and 134). However, draft Policy DM6 is not specifically concerned with the impact of tall and taller buildings on heritage assets. As drafted, Policy DM6 appears to presuppose that harm will result from the provision of tall or taller buildings. This approach does not result in a positively prepared, forward thinking policy that encourages development and the optimisation of sites to deliver the growth envisaged by the development plan as a whole. In our view, requiring community benefits is inappropriate and unreasonable in the context of tall and taller buildings and should be deleted from the</p>	<p>Workspace supports the detail of the draft policy in respect of tall buildings being ‘a wayfinder or marker’ (C.a.i) and considers that it would be appropriate to also add public spaces/ urban squares in to the wording.</p> <p>In our view, requiring community benefits is inappropriate and unreasonable in the context of tall and taller buildings and should be deleted from the policy.</p>	<p>For suggested change on (C.a.i) the Council disagrees as tall buildings often necessarily need to ‘land’ within a generous public spaces or urban square to provide a more human scale at ground level and to reduce the feeling of dominance and enclosure. The provision of such mitigation can therefore not be considered to justify the tall building.</p> <p>As set out at paragraph 2.40, taller buildings can be prominent and visual features which affect everyone. While</p>
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				<p>policy.</p> <p>Part E requires the submission of a digital 3D model for all proposals for taller or tall buildings. Paragraph 193 of the NPPF states that local authorities ‘should only request supporting information that is relevant, necessary and material to the application in question’. Whilst we appreciate that sufficient information would need to be submitted in respect of tall and taller buildings to allow a full and thorough assessment of impact, we consider that it is unreasonable to policy to prescribe the exact nature of such information. 3D images of tall and taller buildings taken from agreed viewpoints is often sufficient to determine the acceptability of building. Requiring a digital 3D model would add to the financial burden of an application in direct conflict with national planning policy.</p>		<p>good design will ensure these buildings are visually attractive, this is a requirement of all development and, therefore, further mitigation is required to justify their need.</p> <p>3D digital modelling is now common practice, and costs are reasonable and considered proportionate to the impacts of tall and taller buildings. Further, the Council has invested in a 3D model for its Growth Areas, which reduces the burden to be placed on applicants promoting tall</p>
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							<p>or taller buildings. This is essential as it enables consideration of the proposal in the context of the spatial development planned for the surrounding area, so will not just consider the context of the building in-situ but in the likely future context of the entire growth area.</p> <p>No change</p>
21	RDM105	Figure 2.2 DM 6	No	Yes	<p>Policy DM6 Part C</p> <p>Parkstock Ltd are the freeholders of both 10 Stroud Green Road and 269 – 271 Seven Sister’s Road located within Finsbury Park. This site falls within allocation SA36: Finsbury Park Bowling Alley within the Site Allocations DPD.</p> <p>Policy DM6 Part C notes that tall buildings will only be acceptable within areas identified on Figure 2.2 as being suitable for tall buildings. Allocated site SA36 is not</p>	<p>Figure 2.2 should be amended to show SA36 as a potential location for tall buildings to ensure consistency between documents</p>	<p>It is recognised that Figure 2.2 is inaccurate and does not reflect the most up to date evidence contained in the ‘Potential Tall Buildings Locations</p>

				<p>shown as a potential location appropriate for tall buildings on Figure 2.2.</p> <p>The text associated with SA36 within the Site Allocations DPD notes that “Taller buildings will be permitted on either side of the new entrance which will help mark Finsbury Park as a destination. This site may be suitable for a tall building if designed in accordance with DM6.” It goes onto state that “Regarding height, the design needs to be carefully justified and designed to demonstrate an acceptable relationship with the retained pub buildings opposite and the buildings across the road, but this site could potentially be suitable for a tall building.”</p> <p>SA36 makes it very clear that the site is potentially suitable for a tall building.</p> <p>Consideration has also been given to the Council’s evidence base and specifically SLR’s Potential Tall Buildings Locations Validations Study (November 2015). In line with SA36, this Study concludes that “there is potential for tall buildings to provide a land-marking role for the town centre, as well as identifying the locations for the station and / or access to Finsbury Park.”</p> <p>In addition, the Council’s Urban Character Study (February 2015), which also forms part of the evidence base, notes that SA36 could again be suitable for taller, high rise buildings</p> <p>We are therefore unclear why SA36 is not shown on Development Management DPD Figure 2.2 which shows potential locations for tall buildings.</p> <p>There is therefore a clear discrepancy and inaccuracy</p>	<p>and the delivery of an effective plan, based on the evidence base.</p>	<p>Validations Study’ (Nov 2015). This map will be amended to show two additional locations potentially suitable for tall buildings. Including southern end of Finsbury Park and the site on the corner of Seven Sisters Road and Tottenham High Road. In addition, to reflect this updated evidence the fifth bullet point in the site requirements of SA36 should be amended to remove the first sentence.</p>
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					between the Site Allocations DPD SA36 and Figure 2.2 within the Development Management DPD. In addition, Figure 2.2 as currently drafted is not justified as it does not align with the Council's evidence base in relation to the potential locations for tall buildings.		
22	RDM107	DM 6	Not Stated	Not Stated	For the reasons explained for Policy DM5, we have concerns regarding Part B(b) of this policy. Part C(c) of the Policy also refers to Council's Tall Buildings and Views Supplementary Planning Document which has not yet been issued for comment and therefore it is inappropriate to consider it formally within this consultation as we cannot comment on its acceptability.	Not specifically stated	The Tall Buildings and Views SPD will provide further guidance on the interpretation of these key policies, and will go through a separate consultation process at a later stage. However, a minor modification is proposed to DM6A(c) to delete the wording 'Be consistent with' and replace this with 'Have regard to'
23	RDM111	DM 6	Not stated	Not stated	This Policy restricts the development of tall buildings to Tottenham Hale, Northumberland Park, and Woodgreen and Harringey Heartlands, as demonstrated on map 2.2.	Not stated specifically	DM6 is clear that a taller building is a building two or

				<p>The Policy allows “proposals for taller buildings that project above the prevailing height of the surrounding area” but defines taller buildings as “those that are two to three storeys higher than the prevailing surrounding building heights”. Provwewell object to this limitation, as allowing for a flexible variation in building heights would enhance the streetscene.</p> <p>It is considered that the Overbury and Eade Road site has the opportunity to deliver a landmark building which would act as a gateway to the Haringey Warehouse District, which would add to the vibrancy of the area, attract businesses and residents alike, and will be intrinsic to the success of the Warehouse District overall. The site allocation SA34: Eade and Overbury Roads earmarks the location of this site on the corner of Seven Sisters Road and Eade Road has the opportunity to become a gateway location to the Warehouse District, yet the restriction of Policy DM6 prevents the opportunity from becoming fully realised. Policy DM6 needs to therefore allow for exceptions, in appropriate locations such as this.</p> <p>The Growing London Report by the Mayor’s Design Advisory Group examined how best to meet London’s housing needs, and suggests that “we have to make better use of the land we have available. We have to develop more densely, and we need to do so within the context of the existing urban fabric and communities”.</p> <p>The PTAL rating for the corner of the site is 5, thus supporting the location for a taller, and higher density development at this part of SA34. Paragraph 65 of the NPPF states that: Local planning authorities should not refuse planning permission for buildings or infrastructure</p>		<p>three storey’s higher than the surrounding buildings heights up to a maximum of nine storeys – i.e. below the 10 storey trigger of a ‘tall’ building’. The Council therefore considers the policy to be flexible and appropriate to sites outside of Growth Areas and sites where the principle of a tall building has been agreed. The provision of a tall building on the Overbury and Eade Road site is not supported by evidence and would be considered to be ‘inappropriately’</p>
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					<p>which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.</p> <p>The London Plan Policy 7.7 supports tall building in locations which improve legibility of an area by emphasising visual significance and contribute towards improving permeability of a site, and significantly contribute towards local regeneration. A tall building on the corner of Eade Road and Seven Sisters Road would therefore accord with this Policy.</p> <p>Historic England’s Tall Buildings Guidance Note 4 also highlights the advantages of tall building policies, and also stresses the importance of identifying areas appropriate for tall buildings, and ensuring early development on public consultation.</p> <p>Haringey Council have identified this as a potential location for a gateway building; and DM6 should therefore carry this through to ensure that this opportunity is maximised. It is considered that this is an ideal location for a taller building, and in light of the above, this policy should not restrict building heights in sustainable locations.</p>		<p>located given the site and surrounding context.</p> <p>No change.</p>
24	RDM112	DM 6	No	Not stated	<p>In our opinion the principle of a tall buildings policy is sound as this will ensure that the plan is both justified and effective. The identification of areas (at figure 2.2) within the Borough suitable for tall buildings is also supported as this will ensure that the plan is positively prepared and justified. The Council’s preparation of an Urban Characterisation Study constitutes a robust and up to date evidence base and justifies the tall building locations defined at figure 2.2.</p>	<p>In order to make the Plan sound we recommend that Policy DM6 Part D(a) is deleted in its entirety.</p>	<p>Disagree. The canyon effect is a term used widely to describe the impacts of proximate tall buildings on various local</p>

					<p>However, Policy DM6 is very detailed and in our opinion as currently drafted this part of the DPD is unsound as it is not justified or effective. In particular, Part D(a) of the policy, which concerns the canyon effect of proximate tall buildings, is in our opinion not justified and could compromise the effectiveness of the Plan.</p> <p>The term canyon effect is vague and its application subjective. The remained of Policy DM6, combined with other design related policies provide sufficient criteria against which to assess the effects, suitability, appropriateness of tall buildings.</p>		<p>conditions to be experienced at ground level, in particular, wind conditions. There is a significant body of evidence of the impact of the canyoning effect from development within central London, which has resulted in acceptable and potentially dangerous conditions for pedestrians and others at street level.</p> <p>No change.</p>
51	RDM159	DM 5 & DM 6	Not Stated	Not Stated	<p>Locally Significant Views and Vistas and Building Heights</p> <p>There appears to be significant overlap between the locally significant views and the locations identified as being suitable for tall buildings. The document states that a Tall Buildings and Views Supplementary Planning Document will be produced. However, to ensure a robust approach, the borough should consider providing more detail in policy DM5 and DM6 as to what the views are aiming to preserve. Further detail should also be provided</p>	The borough should consider providing more detail in policy DM5 and DM6 as to what the views are aiming to preserve.	Policy DM5 and its associated table should be read in conjunction with the Schedule of Locally Significant Views included as Appendix A

					in the Wood Green Area Action Plan (AAP).	Further detail should also be provided in the Wood Green Area Action Plan (AAP).	of the DM DPD, which provides further details in this respect – for example, ‘viewing places’ and ‘assessment points’, along with types of view (i.e. panorama, linear, townscape). To assist with policy implementation, the Council will prepare a Tall Buildings and View SPG. The Council will also give consideration to further details in the Wood Green AAP.
53	RDM170	DM6	Not stated	Not stated	We welcome the inclusion of the significance of heritage assets and their settings as a design requirement when assessing proposals for both ‘taller’ and ‘tall’ buildings. However it is important to ensure consistency in the evidence used to support both forms of tall buildings. For example paragraph 2.42 states that Council’s approach to Tall buildings has been informed by their own Urban Characterisation Study and the Tall Buildings Location	Clarification needed	The issue with ‘taller’ buildings is that they are not specific to locations, rather they are deemed suitable across

					Validation Study. This implies that there is no evidence to support the concept and potential location of 'taller' buildings. This raises concerns on the robustness of this aspect of the policy and its deliverability without causing potential harm to heritage interests. Further clarification is needed on this important aspect		the borough subject to meeting the policy tests, as well as other policy requirements in the plan including those relating to density and urban design. This should naturally limit their acceptability to only certain circumstances No change
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Policy DM7 Development on Infill, Backland and Garden Land Sites

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
3	RD M4	DM 7 B a, b	No	Not Stated	This policy is too vague and will lead to subjective and inconsistent decision-making by individual officers, thus undermining public confidence in the planning process.	The following should be added to make the policy sound, in order to avoid inconsistency in planning decisions:	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively. Policy DM 7 requires that proposals on backland and infill sites satisfy DM 1 and relate appropriately and sensitively to the surrounding context,

						"New buildings on backlands and infill sites should be no taller than surrounding adjacent properties"	and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area. No change.
4	RD M6	DM 7	Not stated	Not stated	For the same reason I believe that DM7, the proposed backlands policy should include a specific provision that building heights should be subordinate to surrounding properties on the lines of previous policies. In small infill developments there needs to be a strong control on height to prevent developments overshadowing local properties, with Connaught House being an example where the absence of such controls has led to an oppressive loss of amenity to neighbours.	I believe that DM7, the proposed backlands policy should include a specific provision that building heights should be subordinate to surrounding properties on the lines of previous policies.	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively. Policy DM 7 requires that proposals on backland sites satisfy DM 1 and relate appropriately and sensitively to the local area, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area. No change.
6	RD M9	DM 7	Not Stated	Not Stated	The proposed Backlands Policy (DM7 on page 19) is not prescriptive on heights. Unlike the withdrawn guidance SPG 3c, it does not specify that building	I would like to request the re-instatement of the prescriptive dist	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively.

					heights should be subordinate to surrounding properties. The need for this is clearly demonstrated by the excessive heights of the Connaught House development which will loom over its neighbours.	ances policy, and the addition of an amendment to specify building heights on backlands site, to ensure that future developments do not compromise the privacy and amenity of neighbouring properties.	Policy DM 7 requires that proposals on backland sites satisfy DM 1 and relate appropriately and sensitively to the local area, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing height of the surrounding area. Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation. No change.
7	RD M11	DM 7	Not stated	Not stated	It is of considerable concern that the Local Plan now excludes the separation of distances policy for residential buildings and that the proposed Backlands Policy is not prescriptive on heights of buildings.	I would urge Haringey to reinstate the distances policy and to amend the Backlands Policy so that future developments do not adversely affect the privacy and amenity of neighbouring properties.	Disagree. The suggested change is considered too onerous and not in line with the NPPF requirement to plan positively. Policy DM 7 requires that proposals on backland sites satisfy DM 1 and relate appropriately and sensitively to the local area, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. In addition, Policy DM 6 sets out requirements on building heights and includes criteria for considering proposals for buildings that project above the prevailing

							height of the surrounding area. No change.
9	RD M16	DM 7	Not Stated	Not Stated	<p>In section DM7, page 19 – 20, points 2.44 – 2.48 admit the necessity of allowing backland developments to meet the Borough’s housing needs and correctly indicate that policy set out in earlier needs to be observed, but without specified rules.</p> <p>This is precisely the type of development where residents’ amenity may be damaged. This is acknowledged on page 19 bullet points B – in particular d, but no specifications for distances, heights or densities are included. Applicants with strong investment interests are bound to submit arguments to satisfy such a vague policy.</p> <p>Also, what is not said is that the permitted new homes may not be affordable – and thus do not satisfy the needs of the Borough.</p> <p>Note that the development behind my house was originally Social Housing; even well-paid key-workers are not likely to be able to purchase homes in the new</p>	Minimal specified heights and separation distances need to be added to section DM7 on backland developments.	<p>The specific separation distances were a useful yardstick for visual privacy but adhering rigidly to these measures often compromised the achievement of better urban design layouts and unnecessarily restricted densities. The Council considers Policy DM1 is appropriate and sufficiently robust to ensure the protection of amenity and privacy on backland development proposals having regard to individual site circumstances.</p> <p>Policy DM6A on building heights does apply to backland development proposals that would fall under Policy DM7. There is no need to repeat policy requirements throughout the document.</p> <p>The objectively assessed housing needs for the borough includes a significant need for market housing as well as for affordable provision.</p> <p>Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>No change.</p>

					<p>development. The obligation to provide 'affordable housing was avoided, by two developers making separate applications for two parts of the site, both parts for fewer than 10 new dwellings, although they cooperate for building operations. HGY/2015/1956</p> <p>I am not sure how the applications escaped the clause in DM 13 page 29 The affordable housing requirement will apply to: Sites that are artificially sub-divided or developed in phases;</p>		
10	RD M25	DM 7	Not Stated	Not Stated	<p>This policy is welcomed with reservations.</p> <p>Building heights should be subordinate to surrounding properties.</p>	Not stated specifically	<p>Policy DM6 applies to proposals on backland and infill sites and requires that building heights be of an appropriate scale which responds positively to the site's surroundings, the local context and achieves a high standard of design in accordance with Policy DM1. The Council therefore considers appropriate policies are provided to manage buildings heights with respect to backland and infill development.</p> <p>No change.</p>
11	RD M43	DM 7	No	Not stated	This policy is welcomed with reservations	Building heights should be subordinate to surrounding	Policy DM6 applies to proposals on backland and infill sites and requires that building heights be of an appropriate scale which responds

						properties.	<p>positively to the site's surroundings, the local context and achieves a high standard of design in accordance with Policy DM1. The Council therefore considers appropriate policies are provided to manage buildings heights with respect to backland and infill development.</p> <p>No change.</p>
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Policy DM8 Shopfronts, Signs and On-Street Dining

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
18	RDM92	DM 3 (C) DM 8 (B)	Yes	Not Stated	<p>The BSGA represents 65% of the sales of signage throughout the UK and monitors development plans throughout the country to ensure the emerging Local Plan Policies do not inappropriately apply more onerous considerations on advertisements than already apply within the NPPF, Planning Practice Guidance (PPG) and the Town and Country Planning (Control of Advertisements)(England) Regulations 2007 (as amended).</p> <p>We commented on earlier drafts of this document in May 2010, March 2013 and February 2015. We are pleased that most of our comments have been taken into account in the production of this</p>	Not stated	Confirmation that the respondent considers the policies to be sound is welcomed.

					latest draft. We consider Policy DM3(C) to be sound. We also consider Policy DM8(B) to be sound.		
18	RDM93	DM 8 Para 2.51	Not stated	Not stated	We have minor reservations about two points in the supporting text. In paragraph 2.51, it is stated that “internally illuminated box fascias” detract from the appearance of the streetscape. This partly contradicts Policy DM8(B) which states that the Council will grant consent for “illuminated fascia signs”. Many modern internally illuminated fascia signs (which necessarily must be in a “box” of some sort, even if individual letters or halo illuminated) are slimline. Many are designed so as to illuminate only the letters/logo. They can be wholly successfully installed on appropriate shopfronts. We think that the advice is intended to discourage older types of bulky, fully internally illuminated signs which may be crudely attached over an existing fascia. We think that the text should make this clear. We therefore suggest that in paragraph 2.51 after ‘poor quality materials,’ be inserted ‘bulky and crudely attached, fully’.	We therefore suggest that in paragraph 2.51 after ‘poor quality materials,’ be inserted ‘bulky and crudely attached, fully’.	Agreed. The Council generally considers that internally illuminated box fascias are not appropriate, however it is recognised that the supporting text can be amended to provide greater flexibility for considering proposals on a case by case basis. The suggested changes will be included in a schedule of proposed minor modifications.
18	RDM94	DM 8 Para 2.53	Not stated	Not stated	In paragraph 2.53, “brightly illuminated’ shop fascias are discouraged. There is nothing wrong with a “bright” fascia in the appropriate location. What is not	We therefore suggest that, in the first sentence of paragraph	Agreed. The suggested changes will be included in a schedule of proposed minor modifications.

					acceptable is an <u>excessively</u> bright fascia which will stand out in the street to the detriment of the overall area. We therefore suggest that, in the first sentence of paragraph 2.53, “ brightly ” be deleted and replaced with “ excessively bright ”.	2.53, “ brightly ” be deleted and replaced with “ excessively bright ”.	
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Policy DM9 Management of the Historic Environment

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
10	RDM26	DM 9	Not Stated	Not Stated	It is not clear how DM9 relates to DM1	Not stated specifically.	There is no conflict between the two policies. Policy DM1 will be considered alongside other policies which seek to ensure that proposals positively respond to local character. In the case of historic environments this includes an area’s historic character, the significance of the historic assets affected, their setting, and architectural features in accordance with Policy DM9. No change.
10	RDM27	DM9	Not Stated	Not Stated	We note that the earlier DM12 has been entirely re-written following comments from English Heritage, Highgate CAAC and others regarding inconsistencies with NPPF and other	Not stated specifically.	The draft policy in the Preferred Options document has been amended to ensure consistency with the NPPF and to take account of the

					<p>matters.</p> <p>This policy, having been entirely rewritten, is being consulted upon for the first time. We trust the Examiner will consider what has been dropped (including the earlier DM33) to ensure our heritage assets will be sufficiently protected</p>		<p>comments received. This is the intended purpose of publishing early drafts for comment. The resulting policy, Policy DM9, is therefore considered to be appropriate and robust having been subject to that process. The earlier version of the DPD and the responses received to previous consultation stages will be submitted to the Planning Inspector for consideration.</p> <p>No change.</p>
10	RDM28	DM 9 Para 2.26	Not Stated	Not Stated	<p>Satellite dishes have an adverse effect on Conservation Areas where located in a position where they are visible from CAs.</p> <p>Para 2.26 suggests that policy is flexible on this point which would be unacceptable</p>	Not stated specifically.	<p>This paragraph highlights the requirement for the need to assess proposals for telecommunications in CAs against DM9 as well as DM3.</p> <p>No change.</p>
10	RDM29	DM 9 Para 2.58	Not Stated	Not Stated	<p>The word 'agreed' in line 5 is inappropriate.</p> <p>The function of a Heritage Statement is a means for the Applicant to suggest to LBH what the significance of the Asset is. On receipt of that document, LBH may agree, or not, with that assessment</p>	Last line: add 'Area' between 'Conservation' and 'Advisory'	<p>Minor modifications: factual correction of title - add 'Area' between 'Conservation' and 'Advisory'</p> <p>Comments noted. For clarity including a Minor modification to remove 'agreed' on the fifth line.</p>
10	RDM30	DM 9 Para	Not Stated	Not Stated	'Highest, moderate and low significance'	Not stated specifically.	These are relative terms for describing significance for the

		2.59	d		Cite source of these criteria		purpose of assessing proposals and are dependent on a number of considerations. See for example current best practice guidance, Historic Environment Good Practice Advice in Planning Note 2. No change.
1 1	RDM44	DM 9	No	Not stated	We note that the earlier DM12 has been entirely re-written following comments from English Heritage and Highgate CAAC regarding inconsistencies with NPPF and other matters. This policy, having been entirely rewritten, is being consulted upon for the first time. We trust the Examiner will consider what has been dropped (including the earlier DM33) to ensure our heritage assets will be sufficiently protected	Not stated specifically.	The draft policy in the Preferred Options document has been amended to ensure consistency with the NPPF and to take account of the comments received. This is the intended purpose of publishing early drafts for comment. The resulting policy, Policy DM9, is therefore considered to be appropriate and robust having been subject to that process. The earlier version of the DPD and the responses received to previous consultation stages will be submitted to the Planning Inspector for consideration. No change.
1 1	RDM45	DM 9 (D)	No	Not stated		The words 'do not' appear to be missing before 'detract' in line 3	The word 'detract' refers to existing sites and buildings that 'detract' from the character of the conservation area, rather than to the potential new development.

							No change.
1 1	RDM47	Para 2.58	No	Not stated	The function of a Heritage Statement is a means for the Applicant to suggest to LBH what the significance of the Asset is. On receipt of that document, LBH may disagree, or not, with that assessment	Not stated specifically.	Comments noted. For clarity including a Minor modification to remove ‘agreed’ on the fifth line.
1 1	RDM48	Para 2.58	No	Not stated		Last line: add 'Area' between 'Conservation' and 'Advisory'	Minor modifications: factual correction of title - add 'Area' between 'Conservation' and 'Advisory'
2 5	RDM11 4	DM9	No	Not Stated	As presently worded, Policy DM9 (Dev Mgt DPD) says the Council will: “give consideration to, and support where appropriate, proposals for the sensitive <i>redevelopment of sites and buildings where these detract from the character and appearance of a Conservation Area...</i>” The area was designated a Conservation Area in 1967 because of concerns that it was in danger of overdevelopment. This designation has been successful in preserving the area until recently. With a new planning regime obliged to treat favourably all plans that have not been expressly precluded, it is necessary to rule out inappropriate heights, densities and forms with clearly stated limits in the Local Plan. NPPF Guidance - Local Plans -	b) Para C of DM6 in The Development Management DPD needs to be amended to incorporate the additional second sentence shown in italics below: “C Tall buildings will only be acceptable in areas identified on Figure 2.2 as being suitable for tall buildings. <i>They are considered inappropriate for and will not be allowed within the Highgate</i>	Disagree. The Council considers DM6 C appropriate and clear in setting out the appropriate locations for tall buildings. No change. The word ‘detract’ refers to the sites and buildings to be redevelopment, rather than to the potential new development. No change.

				<p>Preparing a Local Plan (Paragraph: 006):</p> <p><i>“Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the ‘what, where, when and how’ questions).</i></p>	<p><i>Conservation Area.”</i></p> <p>c) Para D of DM9 in the Development Management DPD needs to be amended to incorporate the words “do not” into Para D under the heading Conservation areas, so the sentence reads:</p> <p><i>“D Subject to (A-C) above the Council will give consideration to, and support where appropriate, proposals for the sensitive redevelopment of sites and buildings where these do not detract from the character and appearance of a Conservation Area and its setting, provided that they are compatible with and/or compliment</i></p>	
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						<p><i>the special characteristics and significance of the area.”</i> <i>(It would be contrary to the Council’s duties to support proposals that could be said to detract from the character and appearance of the Conservation Area – this is a drafting mistake.)</i></p>	
53	RDM172	DM 9	Not stated	Not stated	<p>In general the policy provides a useful framework in which to manage Haringey’s historic environment. However, in its current form insufficient guidance is given on how to treat issues around potential harm to the significance of heritage assets. In particular it does not consider the level of harm that could be caused, its relationship with the significance of the heritage asset (as potentially expressed in its grade and type) and the reason when harm may be justified. It is noted with interest that this issue has been addressed in the Tottenham AAP (policy AAP5) but not carried forward in this borough wide policy. This aspect is a key requirement of the NPPF (e.g. as expressed in paragraphs 132-135), which needs to be recognised in the</p>	<p>Policy should include guidance is given on how to treat issues around potential harm to the significance of heritage assets.</p> <p>Policy should consider open spaces that have heritage interest.</p> <p>Managing Haringey’s Heritage Assets - Archaeology paragraph 2.75 line 8 - the word ‘assessment’ should be replaced with</p>	<p>The Council considers that Policy DM 9 sets a positive framework for conserving and enhancing Haringey’s heritage assets – this gives effect to, and is considered to be consistent with, the NPPF. The policy sets out key principles and requirements against which all proposals will be assessed, and the supporting text is considered to provide an appropriate level of guidance to assist with policy implementation, with clear signposting to the NPPF. The Council does not consider it necessary to repeat national policy in the Local Plan.</p> <p>Paragraphs 2.55 and 2.56 set</p>

				<p>context of the whole Local Plan not in specific parts (as currently presented).</p> <p>In addition the policy does not consider open spaces that have heritage interest. In particular registered parks and gardens (e.g. four designated RP&G in the borough), and other open spaces that may have been identified by the London Parks and Gardens Trust (link below) and the issues that need to be considered to ensure their significance is appropriately conserved and enhanced. (web link to the LP&GT - http://www.londongardensonline.org.uk/select-borough-results.asp?Borough=Haringey&Submit=Go)</p> <p>Under part I (archaeology) we would seek to ensure all assessments are published, therefore enabling dissemination of findings to all. In addition it should be noted that with the support of the Mayor, the Greater London Archaeological Advisory Service is conducting a review of all the London Borough's Archaeological Priority Areas to ensure that they provide a consistent and up to date evidence base for Local Plans. Haringey's APAs have not been reviewed for many years so may no</p>	<p>'evaluation', and line 15-need to be substituted 'archiving' with 'publication and deposition in an appropriate designated museum'. Paragraph 2.76 clarification: the Greater London Archaeological Advisory Service is part of Historic England, so 'and where appropriate' could be deleted.</p>	<p>out the local Historic Environment Record, which includes registered parks and gardens, historic green spaces and other parks and gardens. The Local Plan is clear that in applying Policy DM 9, proposals will be considered having regard to these heritage assets.</p> <p>The Council considers that DM 9.1 as currently worded provides scope for the publishing of assessments, however this will be further clarified in the supporting text along the lines suggested.</p> <p>Amend 2nd last sentence of paragraph 2.75 to read:</p> <p><u>"If it is suitably demonstrated that this is not possible, a programme of conservation will be required including satisfactory excavation and recording of remains on site along with arrangements for archiving, including publication and deposition in an appropriate designated museum."</u></p> <p>Amend paragraph 2.76 to</p>
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					<p>longer be a reliable indication of archaeological significance and potential. The review of Haringey's APAs is currently timetabled for 2022 although we would welcome funded arrangements for accelerating the service.</p> <p><i>Managing Haringey's Heritage Assets - Archaeology</i> paragraph 2.75 line 8 - the word 'assessment' should be replaced with 'evaluation', and line 15-need to substituted 'archiving' with 'publication and deposition in an appropriate designated museum'.</p> <p>Paragraph 2.76 clarification: the Greater London Archaeological Advisory Service is part of Historic England, so 'and where appropriate' could be deleted.</p>		<p>read:</p> <p>“Applicants should seek advice from, and the Council will consult, GLAAS (Greater London Authority Archaeological Service) and, where appropriate, Historic England in all applications...”</p>
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Policy DM10 Housing Supply

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM17	DM 10 DM 11	Not Stated	Not Stated	The assurances under DM10, including mixed use, repair of existing homes etc. are good for the community. DM11 refers to mix referring to size & occupancy, but social mix should also be promoted. One good thing that came of the	DM11 refers to mix referring to size & occupancy, but social mix should also be promoted.	Provision for Social mix is provided for in policies DM13, DM14, DM15 & DM17. Policy DM12D requires mixed tenure schemes to be designed to be 'tenure blind' . No change.

					'Right to Buy' is that tenants and owner-occupiers live side-by side. Developers often seek to segregate tenants and home-owners, and this should be vigorously opposed.		
16	RDM77	DM 10	Yes	Not stated	We support Criterion A which supports and directs proposals for new housing to sites allocated for residential development, including mixed use residential development. However, as noted in our representations on the Site Allocations document, this policy would be ineffective unless the Site Allocations document specifically allocates mixed use development sites, namely the Sites SA18 and SA21, to include residential use.	Not stated	The Site Allocations DPD does allocate sites for residential or mix-use development, as shown in the table for each allocation under the indicative development capacity. Policy DM10A is therefore consistent with the Site Allocations DPD. No change.

Policy DM11 Housing Mix

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM17	DM 10 DM 11	Not Stated	Not Stated	The assurances under DM10, including mixed use, repair of existing homes etc. are good for the community. DM11 refers to mix referring to size & occupancy,	DM11 refers to mix referring to size & occupancy, but social mix should also be promoted.	Provision for Social mix is provided for in policies DM13, DM14, DM15 & DM17. Policy DM12D requires mixed tenure schemes to be designed to be 'tenure blind' . No change.

					but social mix should also be promoted. One good thing that came of the 'Right to Buy' is that tenants and owner-occupiers live side-by side. Developers often seek to segregate tenants and home-owners, and this should be vigorously opposed.		
10	RDM31	DM 11, Para 3.3, 3rd bullet	Not Stated	Not Stated	'... strategic Borough target of 40%' Evidence base may suggest this is the case now but it would be regrettable to give a firm target with the result that advantage cannot be taken of fluctuations in the economy and land values. This policy should be framed in the same way as the Carbon	Not stated specifically.	Evidence from the Borough's latest viability assessment – Haringey Development Appraisals & Viability Testing, Jan 2015 – strongly indicates that the existing borough wide target (50%) is not viable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure that the provision of affordable housing does not harm the delivery of housing. This is a proposed amendment in the Alterations to the Strategic Policies (Alt49). Targets for affordable housing should only be set locally having regard to local needs and circumstances. Fluctuations are able to be picked up through monitoring undertaken annually and can result in recommendations update to the Local Plan, as necessary. No change

					reduction one : Haringey will achieve targets in line the national and London Plan policy and/or:		
10	RDM32	DM 11, Para 3.8	Not Stated	Not Stated	'robustly seek... affordable housing' Adopt a Haringey or, if it comes forward, a London Plan, format for viability statements that are transparent, robust and reliable with Section 106 agreements to allow claw-back of profits in excess of those anticipated to be returned to LBH, ring-fenced for social or affordable housing.	Not stated specifically.	Agreed. Haringey's current format for viability appraisals is set out in the Planning Obligations SPD. If a London-wide format is produced, the Planning Obligations SPD will be updated to reflect this. Where appropriate, s106 agreements include review mechanisms and/or claw-back arrangements to ensure the maximum reasonable amount of affordable housing is secured on individual development sites. Any uplift, if achieved, could result in further affordable housing being provided on site or a financial contribution in lieu, the latter 'ring-fenced' for affordable housing provision. No change.
11	RDM49	DM 11 Para 3.3 3 rd bullet, and Para	Not Stated	Not Stated	'... strategic Borough target of 40%' 'robustly seek... affordable housing'	Not stated specifically.	Evidence from the Borough's latest viability assessment – Haringey Development Appraisals & Viability Testing, Jan 2015 – strongly indicates that the existing borough wide target (50%) is not viable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure that the provision of affordable housing does not harm the

		3.8		<p>Evidence base may suggest this is the case now but it would be regrettable to give a firm target with the result that advantage cannot be taken of fluctuations in the economy and land values. This policy should be framed in the same way as the Carbon reduction one :</p> <p>Haringey will achieve targets in line the national and London Plan policy and/or:</p> <p>Adopt a Haringey or, if it comes forward, a London Plan, format for viability statements that are transparent, robust and reliable with Section 106 agreements to allow claw-back of profits in excess of</p>	<p>delivery of housing. This is a proposed amendment in the Alterations to the Strategic Policies (Alt49). Targets for affordable housing should only be set locally having regard to local needs and circumstances. Fluctuations are able to be picked up through monitoring undertaken annually and can result in recommendations update to the Local Plan, as necessary.</p> <p>Agreed. Haringey’s current format for viability appraisals is set out in the Planning Obligations SPD. If a London-wide format is produced, the Planning Obligations SPD will be updated to reflect this. Where appropriate, s106 agreements include review mechanisms and/or claw-back arrangements to ensure the maximum reasonable amount of affordable housing is secured on individual development sites. Any uplift, if achieved, could result in further affordable housing being provided on site or a financial contribution in lieu, the latter ‘ring-fenced’ for affordable housing provision.</p> <p>No change.</p>
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					those anticipated to be returned to LBH, ring-fenced for social or affordable housing.		
13	RDM65	DM 11	No	Not stated	As outlined for Policy SP2, this approach to density is not consistent with national policy. Development proposals should be design-led. The key consideration for any development should not be density but the quality of the proposed development and the place it will create. The Haringey Urban Characterisation Study 2014 is helpful but should only be used in practice as an indicative baseline guide to development and	Para 3.9 of the supporting text suggests an approach such as this but the wording of the Policy itself should be relaxed, to allow easy application	The Council considers that the suggested changes are currently reflected in the Policy DM 11(B). No change.

					the policy should be updated to reflect this. An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space.		
17	RDM85	DM 11	Not Stated	Not Stated	Policy DM11 aspires for a mix of housing in new developments having regard to a range of factors which are supported. Part C of the draft policy seeks to prevent an overconcentration of smaller units (i.e. one and two-bed units) unless part of larger developments or in areas where there is a predominance of	It should be reworded to clarify that, in line with the NPPF, market demand will also be taken in to consideration when determining appropriate housing mix.	Disagree. The Plan as a whole seeks to meet local housing needs and to deliver balanced and sustainable communities. Market demand should conform to the former and help deliver the latter but where market demand is at odds with meeting these strategic objectives, it is likely to result in harmful impacts. No change

					<p>larger units. In line with the NPPF, local authorities should plan for a mix of housing based on 'current and future demographic trends, market trends and the needs of different groups' (paragraph 50). Whilst demographic trends may indicate need for units with three bedrooms or more, demand for these is likely to exist in certain areas within the borough and may not correspond to market trends. As worded, we consider the policy to be overly restrictive and not sufficiently flexible to respond to changing market demand. It should be reworded to</p>		
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					clarify that, in line with the NPPF, market demand will also be taken in to consideration when determining appropriate housing mix.		
22	RDM108	DM 11	Not Stated	Not Stated	<p>Part A (a) of the policy should include reference to the viability of the development in accordance with the NPPF and NPPG.</p> <p>Part A (b) requires the target mix for affordable housing, in accordance with Policies SP2 and DM13, and the Council's Housing Strategy which itself is in draft and has been out to consultation.</p> <p>Part B confirms that "The Council will apply the London Plan policies on</p>	Not specifically stated	<p>Disagree. The issue of viability is clearly stated in SP2 (5), to which DM11 A(b) refers.</p> <p>The Council's Housing Strategy sets out the Council vision, objectives and principles for housing in the borough. The draft status of the Housing Strategy does not affect the bringing forward of this policy.</p> <p>The assessment of townscape character within the Haringey Urban Characterisation Study (2015) takes account of a wider area, and may therefore not be specific to an individual site but is representative of the surrounding context.</p> <p>No change</p>

					<p>residential density in accordance with Policy SP2 but expects the optimum housing potential of a site to be determined through a rigorous design-led approach (see Policies DM1 and DM2), also having regard to the findings of the Haringey Urban Characterisation Study (2015)”.</p> <p>We consider the first component of Part B to be unnecessary owing to Policy SP2, and do not consider that the Haringey Urban Characterisation Study should inform “the optimum housing potential of a site”. Page 156 of the 2015 Urban Character Study Building Height</p>	
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					<p>Recommendations suggests, for example, buildings heights of 3 to 6 storeys across the Clarendon Gas Works site. This despite it being an allocated Central site for Density Purposes (see page 240 of the 2015 Urban Character Study); the majority of the rest of the Borough being an urban, suburban or greenfield location; and the growth requirements of the London Plan. 3 to 6 storeys would be an underutilisation of this site, and in any event would not reflect the extant planning permission which is principally for 7 to 9 storeys. We consider that Part B should be</p>	
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					deleted.		
26	RDM115	DM 11	No	Not Stated	Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors.	On the above basis we recommend that part C should be deleted from the policy.	DM 11 A should be considered in its entirety, also taking into account DM 11 A (e) which states that proposals will be considered having regard to the need to achieve mixed and balanced communities. The Council considers that DM 11 C complements DM 11 A on this matter, and provides sufficient flexibility to consider proposals having regard to individual site circumstances. Para 3.11 clearly sets out the purpose of part C. No change.

					<p>C&R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.</p> <p>Part C of Policy DM11 indicates that the Council will not support proposals which result in an over concentration of 1 and 2 bed units unless they are part of larger developments or within neighbourhoods where such provision would deliver a better mix of unit sizes which include larger and family units. Part A (a) of the policy states that the suitability of a proposed housing development</p>	
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					<p>would be considered, in part, on the basis of ‘individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed’. There is an internal conflict between this part of the policy and Part C. The latter appears to apply an absolute requirement which fails to acknowledge that there may be individual site circumstances, as set out in Part A (a) that militate against such an approach.</p> <p>Part (A) of the policy sets out the criteria against which development will</p>		
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					<p>be considered and in our view provides sufficient guidance for determining planning applications.</p> <p>We therefore consider that part C is neither justified nor effective and unsound on this basis.</p>		
51	RDM160	DM11	Not Stated	Not Stated	<p>Housing Mix The Mayor welcomes Haringey’s acknowledgement of the important role the private rented sector can play in providing housing choice. However, proposed policy DM11 should recognise, as the London Plan does, the distinct economics of covenanted private rented developments and</p>	<p>Proposed policy DM11 should recognise, as the London Plan does, the distinct economics of covenanted private rented developments and this should be taken into account when undertaking viability assessments of covenanted schemes.</p>	<p>Include the following after the 3rd sentence at paragraph 3.9: “In accordance with the London Plan, the distinct economics of covenanted private rented developments will be taken into account in the assessment of scheme viability.”</p>

					<p>this should be taken into account when undertaking viability assessments of covenanted schemes. Building on the draft interim version, the Mayor's Housing SPG will be published in March and will provide further guidance on the working of covenants and clawback mechanisms for private rented developments.</p>		
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Policy DM12 Housing Design and Quality

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RDM33	DM 12	Not Stated	Not Stated	Para 3.15 states full width extensions would not normally be acceptable. Guidance on when full width extensions would be acceptable would be helpful and aid sound and consistent decision-making in Conservation Areas and	Clarification recommended	It is not appropriate to provide the guidance suggested as an acceptable full width extension is considered to be an exception. This paragraph allows for proposals to be assessed on a case by case basis, having regard to site specific circumstances. If a proposal for a

					elsewhere		full width rear extension is submitted it would be expected to meet the requirements of the relevant policies as well as the guidance set out in para 3.15 and DM1. No change.
11	RDM50	DM 12	Not Stated	Not Stated	Para 3.15 states full width extensions would not normally be acceptable. Guidance on when full width extensions would be acceptable would be helpful and aid sound and consistent decision-making.	Clarification recommended	It is not appropriate to provide the guidance suggested as an acceptable full width extension is considered to be an exception. This paragraph allows for proposals to be assessed on a case by case basis, having regard to site specific circumstances. If a proposal for a full width rear extension is submitted it would be expected to meet the requirements of the relevant policies as well as the guidance set out in para 3.15 and DM1. No change.
27	RDM116	Paragraph 1.22 / Paragraph 3.17	Not Stated	Not Stated	Point 1 Paragraph 1.22 States It is intended that the policies contained within this document are to be applied borough-wide unless specified otherwise in an Area Action Plan. However Para 3.17 States that "The Council considers that there are exceptional circumstances for residential extensions in South Tottenham that merit further considerations. Proposals will therefore be expected to have	Haringey to identify the outcome of all relevant impact assessments on all documents referenced in the plan. Haringey to explain why the South Tottenham House	Equality Impact Assessments (EqIA) are carried out for all Development Plan Documents, in line with regulations. The EqIA and Health Impact Assessments were integrated into the Sustainability Appraisals for the Local Plan Documents. This is available to view on the Local Plan webpages. An EqIA was also carried out for the

					<p>regard to the South Tottenham House Extensions Supplementary Planning Document. Paragraph 3.17 provides for a special treatment of a particular locality and in its operation, special treatment of a particular community, it is therefore in conflict with paragraph 1.22 and possibly with equalities legislation.</p> <p>Point 2 Impact Assessments: Although the document states that Impact Assessments as described in paragraphs 1.14 to 1.17 have been carried out on the Plan. It appears that documents that have been referenced in the Plan including SPD's may not be subject to impact assessments. Impact assessments should be shown to have been carried out on all documents that form part of or are referenced in the plan</p>	<p>Extensions Supplementary Planning Document applies to the South Tottenham area only and not to the rest of the Borough</p>	<p>original version of the South Tottenham House Extensions SPD. (This can be accessed on the Council's website) The Council considered it appropriate to refer to the original EqlA and the Local Plan Strategic Policies EqlA to support the preparation of the review of the House Extensions SPD. The purpose and role of the SPD is clearly set out in the documents, this can be accessed on the Council's website.</p> <p>No change</p>
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Policy DM13 Affordable Housing

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RDM66	DM 13	No	Not stated	Policy DM13 D, is not wholly supported. It states that viability	The RICS Guidance (2012: pp.38)	In line with the London Plan approach, the Council

					<p>assessments must be based on a standard residual valuation approach, with the benchmark existing use land value taken as the existing/alternative use value.</p> <p>Viability and deliverability are key to securing national policy's aspiration of sustainable development, as outlined in Paragraph 173 of the National Planning Policy Framework (NPPF). Land or site value is central to the consideration of viability and the most appropriate way to assess this value can vary.</p> <p>The CLG guidance on section 106 and affordable housing requirement states: 'Any purchase price used should be benchmarked against both market values and sales prices of comparable sites in the locality' (with our emphasis added)</p>	<p>additionally explains that 'Competitive returns can only be achieved in a market context (i.e. Market value) not one which is hypothetically based with an arbitrary mark-up applied, as in the case of EUV.</p> <p>As such, we request that this element of the policy is amended accordingly and we refer to our earlier representations at Regulation 18 stage in this respect.</p>	<p>considers that existing / alternative use value is the appropriate benchmark for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based on the current planning land use designation.</p> <p>No change.</p>
16	RDM78	DM13	No	Not stated	<p>Sub-criterion a) of Criterion A refers to the borough-wide target of 40% affordable housing provision. As we objected (to the Strategic Policies SP2) we consider that for development proposals within Haringey Heartland, a lower affordable housing target should be set, to ensure the deliverability of redevelopment schemes to facilitate regeneration of the area.</p>	<p>A lower affordable housing target should be set, to ensure the deliverability of redevelopment schemes to facilitate regeneration of the area.</p>	<p>The borough-wide affordable housing delivery target has been set having regard to local evidence, including the SHMA and Haringey Development Appraisals Viability Testing (2015), which suggests that a 40% target, from all sources, is appropriate to ensure the provision of much needed affordable housing does not harm development viability.</p> <p>No change.</p>

17	RDM86	DM 13	Not Stated	Not Stated	<p>Policy DM13 considers Affordable Housing provision. It is of note that Haringey is socially and economically polarised with high levels of deprivation in certain parts and extreme affluence in others. As expected, the majority of social rented accommodation is heavily concentrated in the poorer areas to the east of the borough. On this basis it is crucial that proposed policy wording makes it clear of the basis on which affordable housing provision will be negotiated. Whilst the policy should refer to viability appraisals and include details of other factors that may influence provision, we note that the pre submission version now specifies the approach of viability assessments (existing/ alternative use value). Furthermore, the level and type of affordable housing should be considered in the context of the availability of grant and the level of developer contributions for on and off-site infrastructure works.</p> <p>LBH must take account of the ever changing backdrop to affordable housing. Indeed at the time of writing the Housing and Infrastructure Bill is due to be heard for a second time and could become law later this summer. The requirement for starter</p>	Not specifically stated	<p>DM13 must necessarily reflect current national and regional policies on affordable housing, and should not pre-determine what might come out of draft Bills.</p> <p>The Council's policy on affordable housing has been informed by viability appraisal testing and has regard to geographic variations by altering the tenure mix in Tottenham through the Tottenham AAP.</p> <p>DM13A(e) includes public subsidy. However, standard viability appraisals include exceptional site costs and grant assumptions. It is therefore not necessary to include all variable in the policy as they will be relevant or not to the negotiation of affordable housing provision depending on site circumstances.</p> <p>No change</p>
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					homes and other forms of tenure must further be explored before LBH crystallise policy DM13.		
20	RDM98	DM 13	Not Stated	Not Stated	<p>Policy DM13 should make clear that Part A (a-g) is not set out in any particular order or level of hierarchy to ensure that equal weight is given to each component part of the Policy.</p> <p>Please refer to the accompanying cover letter (part (d) (ii).</p>	<p>Policy DM13 should make clear that Part A (a-g) is not set out in any particular order or level of hierarchy to ensure that equal weight is given to each component part of the Policy.</p>	<p>This is not considered necessary as none of the criteria imply an order or hierarchy unless specifically stated so in the policy.</p> <p>No change</p>
24	RDM113	DM13	No	Not stated	<p>In our opinion Part D of Policy DM13 is unsound as it is not justified nor consistent with national policy. Part D as currently worded proposes a fix to the valuation methodology and approach to determining land value. In our opinion it is not the purpose of planning policy/or the planning system to be prescriptive concerning particular methods of valuation. The National Planning Policy Guidance (NPPG) at Paragraph 14, Reference ID 10-014-20140306 states:</p> <p>'Central to the consideration of viability is the assessment of land or site value. The most appropriate way to assess land or site value will vary but there are common principles which should be reflected. In all cases, estimated land or site value should:</p>	<p>In order to render the Plan sound we recommend that Part D of Policy DM13 is deleted entirely.</p>	<p>In line with the London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land use designation.</p> <p>No change</p>

					<p>reflect emerging policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge; provide a competitive return to willing developers and land owners (including equity resulting from those building their own homes); and be informed by comparable, market-based evidence wherever possible. Where transacted bids are significantly above the market norm, they should not be used as part of this exercise.'</p> <p>In our opinion Part D of Policy DM13 would preclude the ability to apply alternative means of determining site value and as such is not consistent with national policy. The NPPG very clearly sets out that the most appropriate way assess site or land value will vary. Furthermore, the Council have not provided any evidence which would justify the precise drafting of this part of the policy.</p>		
28	RDM117	DM13	Not Stated	Not Stated	Part B of draft Policy DM13 seeks to apply the affordable housing requirement to, amongst other things, additional residential units that are created through amended applications. The application of this policy is considered to be contrary to the policy purpose for small	The application of this policy is considered to be contrary to the policy purpose for small developers and instead should be applied on a site	Part B(b) seeks to ensure that, when applicants come back to modify consented development, if the revised scheme includes additional units then the amount of affordable housing is also to be revisited based on the new

					developers and instead should be applied on a site by site basis, with full consideration given to the sites characteristics and merits of the proposal.	by site basis, with full consideration given to the sites characteristics and merits of the proposal.	total housing figure. No change
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Policy DM14 Self Build and Custom Build Housing

No comments received

Policy DM15 Specialist Housing

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM18	DM 15	Not Stated	Not Stated	On page 31 for DM15, point 3.28 includes the needs of older people. Support for home adaptation should be specifically promised. Also greater provision of homes suitable for older people, to rent or to buy should be a council priority. This may contribute to freeing up family homes that are badly needed.	Support for home adaptation should be specifically promised. Also greater provision of homes suitable for older people, to rent or to buy should be a council priority.	Home adaptations do not normally require planning permission and, therefore, a policy supporting home adaptation would be redundant. DM15 supports provisions for older persons housing. As set out at paragraph 3.29, the provision of older persons housing will have regard to the benchmark in the London Plan, which suggest provision should be made for 100 older person's home per annum within Haringey but this would be in the context of delivering the borough

							strategic requirement of 1,502 homes.
							No change.
16	RDM79	DM15	No	Not stated	<p>Policy DM15 (Specialist Housing): Criterion C supports student accommodation to be delivered as part of new major development schemes in Haringey's Growth Areas and within or at the edge of a town centre, if a requirement for further student accommodation is identified in the future. We support this aspect of the policy, as student accommodation could be delivered on long term redevelopment opportunity sites in Haringey Heartland such as our client's sites.</p> <p>Criterion D sets out criteria based assessment for proposals for student accommodation. We <i>object</i> to sub-criterion f) as it is considered onerous to require the provision an element of affordable student accommodation in the event that it is not made available for occupation by members of a specified educational institution(s).</p>	In line with the London Plan (paragraph 5.53B), the provision of an element of affordable student accommodation should be subject to viability, and in the context of average student incomes and rests for broadly comparable accommodation provided by London universities. The supporting paragraph 3.33 should also be amended.	As set out in DM13, unsecured student accommodation will trigger the provisions of the Affordable Housing policy, which includes at Part D viability considerations.
34	RDM124	DM15	Not Stated	Not Stated	- Specialist Housing Accommodation Like many other boroughs, Haringey's Housing Strategy confirms the Council are finding it increasingly difficult to secure good quality, sustainable and affordable temporary accommodation of all types in London. Competition for	None Stated	Comments noted.

				<p>private rented homes has driven up prices, sometimes further fuelled by suppliers who actively inflate the market. Meanwhile, the council is dealing with rising levels of homelessness, with households often spending longer in temporary accommodation.</p> <p>The housing strategy sets out to meet the challenge on demand, and to contain costs, the council are working in different ways and are;</p> <p>“Forging new partnerships with investors offering long-term investment to provide affordable, good quality, secure homes to help homeless households as well as additional, less expensive temporary accommodation. P25 – para.2”</p> <p>Haringey’s emerging policy DM15 relates to “Specialist Housing” and is relevant in this case. The policy sets out the Council will support proposals for new special needs housing where it can be shown that there is an established local need for the form of special needs housing sought having regard also to the aims and recommendations of Haringey’s Housing Strategy and Older People Strategy.</p> <p>To establish whether there is a local need for specialist accommodation, discussions have been held with Andrew Billany, Managing Director of</p>		
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					<p>Homes from Haringey. These discussions have confirmed there is a need for specialist accommodation which is capable of the meeting the needs of the local authorities housing demands Haringey Homes would in principle be willing to enter into a lease agreement to take over the building as a whole.</p> <p>The new building which already has consent and is located within an area with good public transport links, has the potential to provide suitable temporary accommodation and, subject to appropriate management and safeguards for occupiers and neighbouring residents, will help to integrate vulnerable people, and special needs groups into the community.</p>		
51	RDM16 1	DM15	Not State d	Not Stated	<p>Special needs housing</p> <p>It is noted that the council will have regard to the London Plan's monitoring benchmarks for the provision of specialist housing for older people, this is welcomed. However, as stated in the Mayor's previous letter, the 2015 London Plan is clear that boroughs should identify and address the need for specialist older person's accommodation, including through targets and performance indicators. In addition, para 3.50C states that Boroughs should work proactively with providers of specialist accommodation</p>	<p>The 2015 London Plan is clear that boroughs should identify and address the need for specialist older person's accommodation, including through targets and performance indicators. In addition, para 3.50C states that Boroughs should</p>	<p>Paragraph 3.29 sets out that the Council will monitor delivery of specialist housing, having regard to the indicative benchmarks set out in Table A5.1 of the London Plan.</p> <p>Paragraph 3.30 reflects the suggested change re: London Plan paragraph 3.50C, stating that the Council will seek to work proactively with providers</p>

					for older people to identify and bring forward appropriate sites. It is suggested that Policy DM15 and supporting text should be updated to address this. Opportunities for identifying suitable locations for older people housing could be progressed through Haringey's emerging Area Action Plans .	work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites. It is suggested that Policy DM15 and supporting text should be updated to address this	of specialist accommodation for older people to identify and bring forward appropriate sites. It should be noted that this may include refurbishment of existing houses. Haringey's Housing Strategy will include further details on how specialist accommodation for older people may be delivered. No change
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Policy DM16 Residential Conversions

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM19	DM 16	Not Stated	Not Stated	Front gardens converted to hard standing is included.	More advice and guidance should be given to residents to conserve gardens; in particular residents should be advised to use paving with absorption properties to avoid heavy rain putting a strain on drains.	Noted. The DM DPD sets out a presumption against the loss of garden land, and policies to promote sustainable drainage. The Council may give consideration to the preparation of further guidance to assist with

							implementation of Local Plan policies.
							No change.
54	RDM178	DM 16/ Topic: Restricted Conversion Areas/ HMOs (unsure of the number)	No	No	(We were just about to submit this Pre-Submission consultation at 4:45pm, when we pressed the back button to check on the previous page, and the whole of our consultation submission went blank. So we contacted Mercy in Planning and she said that, although it was after 5pm we could resubmit. We are now having to rewrite our submission). We are opposed to Option 1: 'Restricted conversion area'. We strongly support Option 2: 'No restricted conversion areas'. (4a) Not Legally Compliant 1, The adoption of Option 1, 'Restricted conversion area' is not compliant with the Statement of Community Involvement, as the Council has not adequately consulted with residents as to their adoption of this Option. Page Green residents have made it clear to Planning and to the local Tottenham Green councillors that they do not want a restricted conversion area, "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	Under Table B: Sets of Alternatives That Have Been the Focus of Appraisal. We are opposed to Option 1: 'Restricted conversion area'. We strongly support Option 2: 'No restricted conversion areas'. *To make Option 2 more compliant with Statement of Community Involvement criteria, we suggest that this option be open to neighbourhood referendum as was the Article 4 Direction on HMOs. Legality 1. Option 2 is compliant with Statement of Community Involvement as it is based on resident and councillor feedback and experience. 2. It is sustainable as it will improve the social, economic and	Policy DM 16 (Residential Conversions) has been set recognising the cumulative adverse impact that conversions have had in parts of the Borough, as set out in paragraph 3.35, along with the need to secure a mix of housing types and tenures in delivering the spatial strategy for the Borough. Further, monitoring information indicates that a greater proportion of 1 and 2 bedroom units are being delivered compared to larger and family size units. In light of the above, the Council considers the approach is an appropriate response to maintaining a supply

				<p>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; overflowing rubbish bins; hot-bedding; prostitution; and drugs. (Let us point out here that these terrible conditions have not once been tackled by Haringey Planning Enforcement without enormous pressure by local residents, who have sometimes had to resort to contacting national news outlets. And now Haringey Council proposes to continue this situation!) 2. Option 1 does not conform generally with regional policy as set out in the London Plan. Regional policy supports home ownership. Option 1 will make home ownership less possible. Furthermore, In SA of the Site Allocation DPD, Housing (page 14) it states, Affordability of housing is a significant issue in the area. The Borough has a relatively low proportion of home ownership (38.8%) compared to London (48.2%). Option 2, 'No restriction of conversion' supports conversion into flats of big homes, and therefore, will facilitate not only homeownership but more affordable housing whilst Option 1 supports family homes becoming HMOs. 4. It is not in line with Haringey's Sustainable Community because Option 1, which</p>	<p>environmental outlook of the community, by supporting home ownership and community coherence and is a buffer against drugs, prostitution and exploitation 3. It supports the national policy by supporting home ownership and affordable housing. Soundness 1. Option 2 is justified as it is an option based on sound resident evidence and evidence that can also be supported by Haringey Planning Enforcement records. 2. It is an appropriate alternative strategy to Option 2 because it does more good than harm, whereas Option 1 does the opposite. 3. Option 2 is effective and deliverable as it is not dependent on Haringey Enforcement. 4. It is flexible, as owners are not forced to convert, whereas, in Option 1 owners are not allowed to convert,</p>	<p>of family sized bedroom units in identified areas, recognising the Local Plan is not reliant on housing conversions to meet its strategic housing target.</p> <p>The restricted conversion policy will be applied alongside Policy DM 17, which will ensure appropriate control over the development of Houses in Multiple Occupation, which has been set recognising local issues experienced as a result of the proliferation of this type of use. However, the enforcement of HMOs, is outside the scope of the Local Plan.</p> <p>The policy is considered to be justified, having been</p>
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				<p>restricts conversion, and therefore, encourages large houses being brought by developers and turned into HMOs. 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 are running our neighbourhoods down in every way. 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 HMOs transient population and, moreover, are as home owners, eager to contribute to the well being of our neighbourhood. Therefore, conversions support sustainability, whereas the availability of large houses for landlords to turn into HMOs does not support sustainability. 4b. Not Sound 1. Option 1 is not supported by evidence. The Council response to our original submission to the Local Plan states, " 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</p>	<p>even if they wish to. 5. It is consistent with national policy in that it supports home ownership.</p>	<p>subject to and supported by outcomes of a sustainability appraisal, in which reasonable alternatives were considered and assessed.</p> <p>The Council considers that it has carried out public consultation in line with its adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.</p> <p>No change</p>
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				<p>an approach to restrict the conversion of family homes in certain areas and this has been tested against a 'no restriction approach' as part of the sustainability appraisal process in considering reasonable policy alternatives. The appraisal has concluded that there are likely positive effects associated with the proposed policy." We residents have never seen this sustainability appraisal. So we have had no chance to evaluate it. Thus the evidence that the Council puts forward is not evidence at all. Moreover, local Tottenham Green councillors can attest to the evidence that large houses, brought by landlords to create HMOs, create a large part of the planning problems in our area, whereas, houses created into flats certainly do not. 2. Option 1, 'Restricted conversion area' is not the most appropriate strategy. Option 2 is the most appropriate strategy. 3. Options 1 is not deliverable. The Council response to our initial submission is that "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 problems associated with poor quality HMOs, an Article 4 Direction was introduced in November 2013 which removed permitted development rights</p>	
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					<p>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." First, despite the Article 4 Direction in November 2013, there have been an increasing amount of problem-generating HMOs in our neighbourhood. So the Council has demonstrated that it is not able to effectively deliver enforcement or even monitor this Directive. Secondly, how can the Council say that enforcement is outside the scope of the Local Plan, when deliverability and evidence is one of the criteria of this plan? 4. Option 1 is not flexible in that it does not take a case-by-case position. Instead it just restricts without adequate evidence. 5. This restriction of conversion works against the National Policy to encourage home ownership because it will disallow conversion into smaller properties, which would be more affordable thus facilitating home</p>	
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					ownership.		
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Policy DM17 Houses in Multiple Occupation

No comments received

Policy DM18 Residential Basement Development and Light Wells

ID	Rep ID	Policy / Para / Figure	Sou nd	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM20	DM 18	Not Stated	Not Stated	Residential conversions are making increasing use of basements. Guidelines are given in DM18, but building control needs to be active in checking that water courses and neighbouring properties are not badly affected.	No response given.	This is the intent of Part A of the Policy. No change.
10	RDM34	DM 18	Not Stated	Not Stated	<p>These policies are adopted by other Councils in London- look at Westminster Council and Camden Council</p> <p>Recent basement applications in Haringey involved inappropriate proposals that could have been dealt with if these clauses had been in effect</p> <p>We suggest reference should be made to DM24 including to the supporting documents (see our comments on DM24)</p> <p>We suggest that issues of safety,</p>	<p>The residential basement policy needs strengthening. We suggest that the following clauses be added to the policy for residential properties:</p> <p>a) basement development does not involve the excavation of more than one storey below the lowest original floor level (except in the case of swimming pools) and should be within the existing footprint of the property</p> <p>b) natural ventilation and daylighting should be used where habitable accommodation is being provided and ventilation and lighting should be energy efficient</p> <p>c) Given the significant disruption of</p>	The Plan should be read in its entirety and proposals should meet the requirements of all relevant policies, including flooding, SUDS, sustainability, energy efficiency, and landscaping, including arboricultural impacts.

					<p>nuisance, etc during construction should be in a separate clause on Construction Management Plans which should be based on HSE Guidelines</p>	<p>basement construction on adjoining neighbours, a construction management plan which demonstrates that the applicant will comply with the relevant parts of the Council's Code of Construction Practice and be aware of the need to comply with other public and private law requirements governing development of this kind</p> <p>d) a basement extension will not be permitted where the purpose is to create a new dwelling house in the residential property or for the purpose of further sub-dividing the existing residential property</p> <p>e) where a basement extension is to a terraced property, the impact on the terrace as a whole (not just the adjoining property) needs to be considered to ensure it is stable, particularly if the terrace is on a slope</p> <p>f) the cumulative impact of a number of basement developments in the same terrace needs to be carefully considered.</p> <p>g) provide a satisfactory landscaping scheme, incorporating soft landscaping, planting and permeable surfacing as appropriate;</p> <p>h) not result in the loss of trees of townscape, ecological or amenity value and, where trees are affected, provide an arboricultural report setting out in particular the steps to</p>	<p>The Council considers that the suggested changes repeat policies contained elsewhere in the Local Plan and that such duplication is unwarranted.</p> <p>The requirement for a Construction Management Plan would form part of the Basement Impact Assessment (see para 3.44), as it is likely to include the mitigation measures proposed to manage any amenity impacts identified.</p> <p>No change.</p>
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						<p>be taken to protect existing trees; there should not be a net loss of trees. New replacement trees should be at least semi-mature and of indigenous species</p> <p>i) incorporate sustainable urban drainage measures to reduce peak rate of run-off or any other mitigation measures recommended in the structural statement or flood risk assessment;</p> <p>j) protect the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape are sensitively designed and discreetly located;</p> <p>k) protect heritage assets, safeguarding significant archaeological deposits and in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance;</p>	
11	RDM5 1	DM 18 A(a-g)	Not Stat ed	Not Stated		We suggest in 'b' that reference is made to DM24	Agreed. Minor Modification to include a reference to Policy DM24 at Part A(b) of Policy 18.
11	RDM5 2	DM 18 A(h-i)	Not Stat	Not Stated	We suggest that issues of safety, nuisance, etc should be in a separate	In 'h', we suggest adding after 'harm to' in first line : 'neighbours or people	Disagree. The Council

			ed		clause on CMPs	passing over their land; to'	considers that Part (h) of DM18 is comprehensive and already has regard to neighbours and all others through the inclusion of ' <i>nor place unreasonable inconvenience on the day to day life of those living, working or visiting nearby</i> '. The suggested change would therefore not add further to the Policy. No change.
11	RDM53	DM 18 B	Not Stated	Not Stated		We suggest reference should be made to DM24 including to the supporting documents (see our comments on DM24)	The proposed minor modification to Part A(b) would already ensure the cross reference between Policy DM18 and Policy DM24. A

							further reference is unnecessary.
							No change
29	RDM1 19	DM18	No	Yes	DM18 is a good start given current planning policy on basements. It does, however, not go far enough. As the neighbour of a resident who is requesting planning permission for a basement, I believe the neighbour protections are not sufficient. Enhanced neighbour protections (as laid out in the Neighbourhood Plan) would, given the lack of specificity within the Party Act to deal with basements, also provide protections over time to those carrying out excavations and additionally provide protections for subsequent owners of both properties.	The Highgate Neighbourhood Plan, currently out for consultation, has a detailed Basement policy. This has been well considered and uses best practice from other London boroughs. There are elements within the proposed policy, particularly regarding neighbour protections, that should be added to the DM18 to make it far more robust. In addition there should be additional rules during the construction process, such as requiring the use of equipment that minimises noise and vibration. For reference, the details below come from the Highgate Neighbourhood plan found here: http://www.highgateneighbourhoodforum.org.uk/plan/ Basements There is considerable concern in Highgate regarding the effect of proliferation of basement developments. Full consideration should be given to the potential impacts of basement developments at application stage. Any assessment has to be full and informed and should cover: <ul style="list-style-type: none"> • The effect of subterranean development on the structural stability of adjacent properties and associated damage caused. Around 45% of all insurance 	Local policies must be based on local evidence. The Council considers that the policy is sufficiently robust and proportionate to positively manage this type of development. Many of the detailed matters raised can be addressed through the Basement Impact Assessment required of applicants, where appropriate. The Council has a statutory duty to support the Highgate

					<p>claims nationwide that involve impact from adjacent basement works relate to failure at design stage; • Irreparable damage to the local water regime both in terms of ground water diversion and surface water flooding. Specific concerns were raised around the effect on a decrease in rainfall catchment for Highgate and Hampstead ponds; • The individual and cumulative impact of developments on the character and biodiversity of gardens and adjacent open spaces, particularly in designated conservation areas and those areas designated Private Open Space adjacent to Metropolitan Open Land (on the Fringes of Hampstead Heath); and • The general loss of amenity to both existing and future residents caused by over development on site. Camden have a comprehensive policy covering basement development in their adopted Core Strategy (DP27). At the time of the production of this Plan, however, Haringey did not have a similarly complete adopted policy. Policy DH5 of this Plan seeks to build on Camden's current policy and ensure that applications for basement development across the Plan area are considered in a consistent and robust manner. Policy DH5: Basements Applications for basement</p>	<p>Neighbourhood Forum in the preparation of its Neighbourhood Plan, and is aware of the draft basement policy, which has not yet been subject to independent examination. The NPPF requires that Neighbourhood Plan policies are in conformity with the strategic policies of Haringey's Local Plan.</p> <p>No change.</p>
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						<p>development will be supported where they provide adequate supporting information and meet the requirements set out within this policy. All proposals of this type will require the following to be considered undertaken and / or provided: 1. Enhanced Basement Impact Assessment (BIA) requirements: i) All applications should be informed by a pre-application BIA questionnaire from neighbours to inform scope of Site Investigation on development site; and ii) Applicants will be required to sample soil along boundaries with neighbours and to monitor ground water for a minimum of 3 months prior to submission in conjunction with meteorological data to establish a realistic model of existing ground water regime; 2. Protection for Neighbours: i) Notwithstanding existing provisions under the Party Wall Act, that may or may not apply, a Schedule of Condition survey will be required of neighbours' properties up to a distance of twice the depth of the basement from the point of excavation. Costs will be covered by the Applicant. ii) A suitably qualified engineer will be appointed by the applicant to oversee the development of basement proposals on behalf of the affected neighbour(s) from their perspective, beginning with the</p>	
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						<p>planning stage right the way through to the construction phase and thereafter up to 5 years after building works have been completed. Costs will be covered by the Applicant. iii) The Applicant must obtain an insurance policy to cover any potential damage arising to neighbouring properties. Alternatively the Applicant can opt to place funds in an Escrow Account to cover any such damage; iv) The applicant must pay a Construction Management Plan (CMP) levy of £2/m3 of excavation volume to be used specifically to repair local roads adjacent to the development site; v) All basements subject of this policy will be designed to a Burland Category of Level 1 as a basic standard and Level 0 where critical above ground structures, such as a swimming pool could be affected; and vi) All BIA issues must be resolved to the satisfaction of the local planning authority prior to determination; and vii) In the interest of openness and transparency Section 106 Agreements may not be used in connection with any basement conditions. Currently all conditions included in S106 Agreements are discharged without involvement/feedback from affected neighbours. 3. Consideration of Construction Impacts on Neighbours:</p>	
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						<p>i) Any basement development should comprise of no more than one storey deep; ii) The footprint of any basement should not exceed 35% of the plot area, with this level reduced to 20% where it will be below Private Open Space; iii) A CMP will be required at planning stage to ensure construction noise, vibration and dust are kept to a minimum and HGV/LGV movements do not significantly increase traffic congestion placing unreasonable stress on local residents given works can take up to 2 years to complete; and iv) A Construction Management Strategy (CMS) will be required at planning stage to ensure methods of construction are tenable. 4. Limiting Environmental/ Ecological Impacts: i) The TER score must take into consideration power used for ventilation, A/C, space heating, pumps; and ii) Any basement development must allow for a minimum of one metre of permeable soil above any part of the basement beneath a garden to support biodiversity and larger trees/planting</p>	
30	RDM1 20	DM 18	No	Not Stated	<p>My comments relate to the lack of a formal basement policy in Haringey. This form of development is becoming increasingly popular, and is rapidly spreading in many areas of Highgate; in my own short street</p>	<p>Clauses adopted from planning regulations relating to basements in force in other London councils should be adopted in Haringey. In particular: 1. Excessively sized basements should be curbed. Development</p>	<p>Policy DM 18 sets out a policy on residential basement development in Haringey. The</p>

				<p>there have been four within the recent past and this rate of basement development seems likely to continue. Some councils (e.g. Camden) have implemented a formal policy to control intrusive and damaging development and it is essential that Haringey should do likewise.</p> <p>A formal policy to protect neighbours is particularly important in Highgate, where many properties are terraced and on steep hills. The structural threat to nearby properties is considerable and some control must be exerted on unsuitable developments, which may in extreme cases (not unknown in other parts of London) cause complete collapse of entire houses and significant damage to neighbouring properties.</p>	<p>should be restricted to the original (usually Victorian) footprint and to one floor.</p> <p>2. The impact on the whole terrace (in the case of terraced houses), and the possible impact of many basement applications within the same terrace, should be considered</p> <p>3. Applicants should be required to lodge a basement impact assessment (BIA) on application and neighbouring residents should be given the option to challenge it</p> <p>4. The impact of basement developments on houses on a steep slope, and of subterranean water flows down the slope, should be explicitly considered.</p> <p>5. The impact of the development on the townscape and historical character of the area should be considered</p> <p>6. A construction management plan should be required as part of the application in order to minimise disruption to neighbours.</p> <p>7. An application should be required to explain how the benefit to the occupants of a basement conversion outweighs the significant inconvenience to neighbours.</p>	<p>Council considers that the policy is sufficiently robust and proportionate to positively manage this type of development, including consideration of impact on amenity, local character, structural stability of adjoining properties and flood risk. Basement Impact Assessments will be required, where appropriate as provided in paragraphs 3.43 and 3.44. The suggested criterion (7.) is not considered to be consistent with NPPF paragraph 193.</p>
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							<p>With regard to the limit on size and storeys of basement proposals, there is currently no local evidence to support a restriction on size. Even in Westminster, the policy limits basements to a single storey 'in most instances' and is therefore not an absolute. In effect, it is for the applicant to demonstrate a genuine need for the size of the basement proposed and the ability to manage impacts especially over a longer build out period which should dictate the acceptability of the scheme.</p> <p>No change</p>
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31	RDM1 21	DM 18	No	Not Stated	<p>I think that Haringey Council must have a basement policy- it is essential to ensure that there is appropriate development and that Haringey residents are protected from inappropriate basement development.</p> <p>DB 18 is a reasonable start but it is pretty basic. There are many more policies that need to be added to protect residents from inappropriate basement development and protect them during the construction process.</p> <p>My neighbour made a highly objectionable planning application which included an excessively large basement in a row of terraced houses on a steep slope in Highgate. I was shocked to learn that Haringey did not have a basement policy that was fully in force. This is essential for the Council to have in order to protect Haringey residents from the actions of inconsiderate neighbours. There have been several instances where houses have fallen down due to basements and the impact on adjoining properties, particularly in terraced housing , is enormous.</p> <p>I cannot think of many other areas in London with the distinct topography of Highgate with its steep hills. I appreciate policy has to apply to the</p>	<p>The residential basement policy needs strengthening. I suggest that the following clauses be added to the policy for residential properties: Many of these clauses have come from other London Councils such as Camden and Westminster. These clauses are additional to the existing policies set out in DB18</p> <p>a) basement development does not involve the excavation of more than one storey below the lowest original floor level (except in the case of swimming pools) and should be within the existing footprint of the property</p> <p>b) natural ventilation and daylighting should be used where habitable accommodation is being provided and ventilation and lighting should be energy efficient.</p> <p>Note: The existing planning rules habitable accommodation must be applied to basement application. The shortage of land in Haringey must not allow sub-standard living accommodation to be created through basement development</p> <p>c)Given the significant disruption of basement construction on adjoining neighbours, a construction management plan which</p>	<p>The Council considers that the suggested changes are too onerous and DM18 is considered to be the most appropriate approach and sufficiently robust to manage basement development.</p> <p>With regard to the limit on size and storeys of basement proposals, there is currently no local evidence to support a restriction on size. Even in Westminster, the policy limits basements to a single storey 'in most instances' and is therefore not an absolute. In effect, it is for the applicant to</p>
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					<p>borough as a whole, however, the risk of basement development on the steep hills of Highgate (particularly on terraced housing where many other people will be impacted not just the applicant) needs to be addressed by Haringey Council</p>	<p>demonstrates that the applicant will comply with the relevant parts of the Council's Code of Construction Practice and awareness of the need to comply with other public and private law requirements governing development of this kind</p> <p>d) The Council may need a Code of Construction practice for basements, for example to deal with use of noise and vibration reducing equipment during the basement build or restricting the hours of operation of excavating</p> <p>e) a basement extension will not be permitted where the purpose is to create a new dwelling house in the residential property or for the purpose of further sub-dividing the existing residential property. You have to control the use of basements to create new flats or dwelling house.</p> <p>f) where a basement extension is to a terraced property, the impact on the terrace as a whole (not just the adjoining property) needs to be considered to ensure it is stable, particularly if the terrace is on a slope- Note; Highgate has many steep slopes- the impact of building basements , particularly on terraced</p>	<p>demonstrate a genuine need for the size of the basement proposed and the ability to manage impacts especially over a longer build out period which should dictate the acceptability of the scheme.</p> <p>No change.</p>
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					<p>housing on steep slopes has to be considered and restricted. The Council need to devise an appropriate policy to deal with this issue</p> <p>g) the cumulative impact of a number of basement developments in the same terrace needs to be carefully considered as well.</p> <p>h) provide a satisfactory landscaping scheme, incorporating soft landscaping, planting and permeable surfacing as appropriate;</p> <p>i) not result in the loss of trees of townscape, ecological or amenity value and, where trees are affected, provide an arboricultural report setting out in particular the steps to be taken to protect existing trees;</p> <p>j) incorporate sustainable urban drainage measures to reduce peak rate of run-off or any other mitigation measures recommended in the structural statement or flood risk assessment;</p> <p>k) protect the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape are sensitively designed and discreetly</p>	
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						located; l) protect heritage assets, safeguarding significant archaeological deposits and in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance;	
32	RDM1 22	DM18	No	Yes	A basement policy for Haringey is long overdue so Policy DM18 is most welcome and provides good basic protection in standard circumstances for neighbouring residents. However, more needs to be done in respect of proposed developments in rows of terraced houses particularly those on steep slopes with a history of instability, of which there are many examples in Highgate and Muswell Hill.	I suggest the following modifications in respect of terraced housing: The Council will not permit basements within terraces with a known history of subsidence and water ingress. Failing that: Basements within terraces should be restricted to the footprint of the house as originally built. To protect the stability of the terrace as a whole, basements should be formed using internal piled walls (without underpinning) within the load bearing walls. This reduces the likelihood of differential movement problems and allows the terrace to continue to move. If the Council is not minded to implement (c) then: The applicant is required to enter into Party Wall Agreements with the owners of <u>all</u> properties within the terrace to cover potential damage throughout the terrace, which is in effect a single construction.	The Council considers that the suggested changes are too onerous and DM18 is considered to be sufficiently robust to address the issues of subsidence and stability. It should be noted that Part Wall agreements fall outside of planning – being covered by separate legislation. No change.

33	RDM1 23	DM18	Not Stat ed	Not Stated	<p>The Haringey LPA has indicated at Local Plan consultations that it intends to follow the lead as set by other LAs namely Kensington & Chelsea. On comparison with K&C basement policy CL7 adopted in January 2015, I welcome the not more than 50% garden rule. However, after comparison, it stops short on several key points. Haringey's DM18 is more generally worded and open to interpretation while K and C's policy is more specific and less open to interpretation.</p> <p>The parts highlighted in yellow below are the elements which differ from Haringey's draft basement policy, my comments are in blue. We ask that Haringey LPA includes these points as they had said they would at planning forums etc.</p> <p>Kensington and Chelsea, Policy CL7, Basements (attached)-</p> <p>The Council will require all basement development to:</p> <p>a) not exceed a maximum of 50% of each garden or open part of the site. The unaffected garden must be in a single area and where relevant should form a continuous area with other neighbouring gardens. Exceptions may be made on large sites;</p> <p>b) not comprise more than one storey. Exceptions may be made on large sites; (comment- Haringey LPA</p>	As stated in blue	<p>Local policies must be based on local evidence. Haringey Council cannot simply apply Kensington and Chelsea's basement policy as the circumstances of the two boroughs are not entirely similar. The Council considers that the suggested changes are too onerous and DM18 is considered to be the most appropriate approach and sufficiently robust to manage basement development proposals within Haringey.</p> <p>No change.</p>
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				<p>could be more bullish, and confident-why not copy this example to limit the impact of super basements)</p> <p>c) not add further basement floors where there is an extant or implemented planning permission for a basement or one built through the exercise of permitted development rights;</p> <p>d) not cause loss, damage or long term threat to trees of townscape or amenity value;</p> <p>e) comply with the tests in national policy as they relate to the assessment of harm to the significance of heritage assets;</p> <p>f) not involve excavation underneath a listed building (Haringey could be more prescriptive they're policy just refers to the historic environment) (including vaults);</p> <p>g) not introduce light wells and railings (Haringey could extend this definition to include railings or glazed balustrades, the draft policy just refers to lightwells) to the front or side of the property where they would seriously harm the character and appearance of the locality, particularly where they are not an established and positive feature of the local streetscape;</p> <p>h) maintain and take opportunities to improve the character or appearance of the building, garden or wider area,</p>	
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				<p>with external elements such as light wells, roof lights, plant and means of escape being sensitively designed and discreetly sited; in the case of light wells and roof lights, also limit the impact of light pollution (Haringey's policy could refer to light pollution);</p> <p>i) include a sustainable drainage system (SuDS), to be retained thereafter; (perhaps Haringey should also include the provision of SuD's in all basements as best practice)</p> <p>j) include a minimum of one metre of soil above any part of the basement beneath a garden; (Haringey's policy simply refers to 'adequate soil depth' again, why not be precise an actually refer to a minimum depth of 1m?)</p> <p>k) ensure that traffic and construction activity do not cause unacceptable harm to pedestrian, cycle, vehicular and road safety; adversely affect bus or other transport operations (e.g. cycle hire), significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working and visiting nearby;</p> <p>l) ensure that construction impacts such as noise, vibration and dust are kept to acceptable levels for the duration of the works;</p> <p>m) be designed to safeguard the structural stability of the existing</p>		
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				<p>building, nearby buildings and other infrastructure including London Underground tunnels and the highway; (Haringey's draft policy does not refer to the underground)</p> <p>n) be protected from sewer flooding through the installation of a suitable pumped device. A specific policy requirement for basements is also contained in Policy CE2, Flooding. In addition, K & C have a Basements SPD which will provide guidance for the information that will need to be submitted with basement application, including the following:</p> <ul style="list-style-type: none"> - Accompanying (but not part of) a planning application, a construction method statement (CMS) will need to be submitted by an appropriately qualified civil or structural engineer, which will contain a report into the ground and hydrological conditions of the site including groundwater flow and explain how these matters will be dealt with during the construction of the site. The CMS will also demonstrate how the excavation, demolition and construction work (including temporary propping and other temporary works) can be carried out whilst safeguarding structural stability. The structural stability of the development itself is not controlled by planning but 	
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				<p>through Building Regulations. The Party Wall Act is more suited to dealing with damage related issues.</p> <p>- ways to minimise disturbance be included in the CMS. Detailed matters to include the drilling of boreholes; impact on trees; the sequence of temporary works to minimise the effect on neighbours; water flow; the consideration of related cumulative impacts; the link between a basement and the host property and the need for professional verification of certain works. Guidance relating to safeguarding amenity, that is noise, vibration and dust from construction works be included.</p> <p>- a draft construction traffic management plan (CTMP) be required to be submitted with the application and where planning permission is granted, the Council will attach a condition requiring a full CTMP. The CTMP will address issues relating to highway safety, the freeflow of traffic, noise associated with/from construction vehicles and availability of parking. Detailed matters will include vehicle stationing, manoeuvring and routeing, parking suspensions and issues in relation to residential and workplace disturbance, arising from vehicle</p>		
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					stationing, loading and unloading and movement.		
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Policy DM19 Nature Conservation

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27 DM28	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.	In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures.	Additional text to paragraph 4.77 as follows: <u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u>

						<p>Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account. We recommend that you include our suggested wording below to address this.</p> <p><i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i></p>	
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Policy DM20 Open Space and Green Grid

ID	Rep ID	Policy / Para /	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
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		Figure		nt			
9	RDM21	DM 20	Not Stated	Not Stated	The green open space used for children’s play has been lost in the approved development behind my house. In addition 5 mature lime trees were felled before the developer submitted his application. Both are a loss to the local environment. HGY/2015/1956	The recommendations in DM20 should be applied in backland developments.	It is not clear what “recommendations” are being referred. Policy DM 7 sets out requirements for managing backland development, having regard to the protection of local character and amenity. Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation. No change.
16	RDM80	DM 20	No	Not stated	Criterion C seeks all development providing new or replacement open space wherever possible, to connect to the All London Green Grid. The policy’s supporting paragraph 4.15 explains that Figure 4.3 shows the existing and proposed Green Grid, including possible links to other points of interest in the Borough such as cultural quarter and town centres.	As Figure 4.3 shows new proposed green grid running through the Heartlands and identified as cycle and walk to green space. In order to clarify the purpose of the Green Grid, the supporting paragraph 4.15 should be amended to state that proposed Green Grid is a pedestrian and cycle link opportunity.	Disagree. The Green Grid is a network of green and open spaces integrated with the Blue Ribbon Network of rivers and waterways, which may include but is not limited to pedestrian and cycle link opportunities. The Council considers that the purpose of the Green Grid is suitably explained in paragraph 4.16. No change.
20	RDM99	DM 20	No	Not Stated	Policy DM Part F requires that “development adjacent to open	Alter wording so that only development	Disagree. Development adjacent to green spaces can

					<p>space should seek to protect and enhance the value and visual character of the open land".</p> <p>Figure 4.1 identifies The Paddock, located to the east of the site, as 'green space'.</p> <p>Similar to our comments regarding policy TH9 relating to the Green Belt, only development proposals that comprise existing 'green space' should respond to the visual character of that open land.</p> <p>Please refer to the accompanying cover letter (part (d) (iii).</p>	<p>proposals that comprise existing 'green space' should respond to the visual character of that open land.</p>	<p>impact on the use, enjoyment, and visual character of an open space, through impacts such as shadowing and dominance, for example. These are important public spaces that are to provide relief from the surrounding urban built up environment. In accordance with DM1, new developments need to have regard to their surroundings and should therefore address open space much as they do the street, by ensuring proposals not impact its character.</p> <p>No change</p>
35	RDM1 26	Policy DM20 Para D.	Yes	Not stated	<p>Sport England supports the replacement of 'small-scale' with 'appropriate scale' with reference to ancillary development; which affords more flexibility and ensures support for outdoor sport and recreation provision.</p>	None Stated	Support noted.
35	RDM1 27	Policy DM20 Para G.	Yes	Not stated	<p>Sport England supports the approach for the provision of publically accessible open space on sites over 1ha for housing, subject to viability. This is under the premise that the standards are locally derived and underpinned by the Council's emerging Playing Pitch Strategy.</p>	Not Specifically stated	Support noted.

47	RDM1 54	DM20, Point A	Not stated	Not stated	Policy DM20, Point A, should reiterate those policies laid out in Policy SP13, in particular in relation to Green belt and Metropolitan Open Land (MOL). Additionally, the text in Point A, relating to granting permission that result in the loss of open space where the open space has been assessed as being surplus to requirements, does not hold for these two designations which receive the strongest protection in the London Plan and National Policy: Green Belt and MOL is protected from inappropriate development, unless exceptional circumstances can be proven.	The text of this section should be amended to reflect the strongest protection afforded to Green Belt and MOL.	The Council does not consider it necessary to repeat the requirements of Policy SP 13 here – the cross reference to this policy is sufficient for signposting. Policy SP 13 and DM 20 make clear that open space will be protected from inappropriate development. This includes considerations for protecting MOL and Green Belt, in line with the London Plan and NPPF. No change.
47	RDM1 55	DM 20 Point B	Not stated	Not stated	Under Point B of Policy DM20, an additional criterion should be added on the basis of significant community consultation and recognition of their support.	Under Point B of Policy DM20, an additional criterion should be added on the basis of significant community consultation and recognition of their support.	The Council does not consider this to be an appropriate planning consideration for determining the acceptability of proposals. Consultation forms part of the planning application process and officers will have regard to the support or opposition given to a specific proposal, and will weigh this against the planning merit of the proposal. No change

Policy DM21 Sustainable Design, Layout and Construction

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27 DM28	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.	In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account. We recommend that you include our suggested wording below to address this.	Additional text to paragraph 4.77 as follows: <u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u>

						<i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i>	
51	RDM163	Paragraph 4.31	Not Stated	Not Stated	Overheating and cooling The changes to this section are welcome. There is an opportunity to note the importance of providing 'cool' refuges within the public realm . Such an approach could link in with Haringey's proposed approach to open space and the green grid, especially where paragraph 4.15 notes the projected population increase, much of which is likely to be housed in flats with limited access to a garden.	There is an opportunity to note the importance of providing 'cool' refuges within the public realm.	Noted. The Council considers that this point is addressed by the London Plan. However, further consideration will be given to including local guidance on this matter in its supplementary planning documents.

Policy DM22 Decentralised Energy

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	RDM81	DM 22	No	Not stated	Criterion B requires all major developments to incorporate site-side communal energy system, irrespective of whether it is connected to Decentralised Energy and to optimise opportunities for extending such systems beyond	We therefore <i>object</i> to sub-criterion b) and consider that it should be	Agree in part. The Council considers that the policy is in general conformity with the London Plan. However

					<p>the site boundary. It should be noted that the London Plan Policy 5.6 requires development proposals <i>examine opportunities</i> to extend the <i>Combined Heat and Energy (CHP) system</i> beyond the site boundary. It is therefore unreasonable to require development proposals to optimise opportunities for extending the communal energy system, irrespective of viability and feasibility.</p> <p>We support the amendment to sub-criterion d) of Criterion C which will take account of technical feasibility and financial viability of a connection to an existing or planning future Decentralised Energy network where connection is expected.</p>	<p>amended as follows: “all development that incorporates site-side communal energy systems should optimise opportunities for extending such systems beyond the site boundary, and where feasible and viable...’</p>	<p>to ensure consistency, the Council will include a minor modification to replace ‘optimise’ with ‘examine’.</p>
17	RDM87	DM 22	Not Stated	Not Stated	<p>It is accepted that developments should seek to connect to existing decentralised energy networks but only where feasible and financially viable to do so (C.d). The inclusion of this provision is welcome and allows for flexibility in the event that there are physical or other reasons why connection is not possible. In our view, it is not appropriate for the policy to require developments within 500 metres of a planned network to secure connection. Delays with the delivery of a planned network could significantly impact on the delivery of development reliant on connection to the network which would be unreasonable and could undermine the growth strategy of the development plan as a whole.</p>	<p>Not specifically stated.</p>	<p>The Council considers that the policy is sufficiently flexible to enable development proposals to come forward, having regard to individual site circumstances, including certainty of delivery of the planned future DE network. Paragraph 4.48 provides further details in this regard.</p> <p>No change</p>
36	RDM128	DM22	Not stated	Not stated	<p>Finally I am concerned about proposals for a decentralised energy network. The likely outcome of this would be a district heat network, with heat generated by combined heat and power</p>	<p>Not specifically stated</p>	<p>DM 22 is supported by national and regional policy. Decentralised Energy is part of a</p>

					generators, run on gas fuel. Fossil fuel generation causes CO2 emissions and does not align with the UK's objective of reducing CO2 emissions by 80% in 2050. We must have electrically powered homes for heating and small power/lighting so that in the future we can benefit from an electrical supply that is powered by renewable energy. This means we need electrically powered heat pumps (probably air source) to provide heating		package of measures to deliver more energy efficient development, working towards a low carbon borough, as set out in SP4. No change.
51	RDM162	DM22	Not Stated	Not Stated	Energy and carbon dioxide emissions The Mayor welcomes the changes to the draft document, in line with his previous comments on this matter. With regards to the Mayor's carbon dioxide targets, as set out in policy 5.2 of the London Plan, further guidance on the definition of 'zero carbon' homes will be provided in the Housing SPG in March. Guidance on zero carbon development will also be provided in the revised Energy Planning - GLA Guidance on preparing energy assessments document. In support of policy 5.2 of the London Plan, the Mayor would encourage Haringey to set out an approach to carbon off-setting and establishing a ring-fenced fund in line with his Sustainable Design and Construction (SD&C) SPG.	In support of policy 5.2 of the London Plan, the Mayor would encourage Haringey to set out an approach to carbon off-setting and establishing a ring-fenced fund in line with his Sustainable Design and Construction (SD&C) SPG.	The Council notes the Mayor's forthcoming guidance documents. Policy DM 21.D sets out the Local Plan approach on carbon-offsetting, in line with the London Plan, and further details in this respect will be included in supplementary planning documents. No change

Policy DM23 Environmental Protection

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21	Yes	Yes	We are pleased to note the inclusion of our comments	In March 2016 we published revised climate change allowances. The revised allowances are based on improved	Additional text to paragraph 4.77 as follows:

		DM23 DM24 DM25 DM27 DM28			<p>from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.</p>	<p>climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account.</p> <p>We recommend that you include our suggested wording below to address this. <i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i></p>	<p><u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u></p>
51	RDM164	DM23	Not Stated	Not Stated	<p>Air Quality The Mayor welcomes Haringey's</p>		<p>The Council considers that Policy DM 23.A reflects the London Plan position that all development</p>

					<p>approach to environmental protection. The section on air quality should note the London Plan’s ‘air quality neutral’ approach set out in London Plan policy 7.14 and the SD&C SPG. The Mayor’s revised ‘The Control of Dust and Emissions from Construction and Demolition’ was published in 2014 and is available on the Mayor’s web-site.</p>		<p>should be at least ‘air quality neutral’ and not lead to a further deterioration of existing poor air quality in Air Quality Management Areas. However, this will be further clarified in the supporting text.</p> <p>Additional sentence at end of paragraph 4.58 to read:</p> <p>“In line with London Plan Policy 7.14, the Council expects that all development should be at least ‘air quality neutral’.”</p> <p>To reflect updated guidance, amend paragraph 4.59 to read:</p> <p>“The GLA and London Council’s Best Practice Guidance on <u>Mayor’s ‘The Control of Dust Emissions from Construction and Demolition’ SPG (2014)</u> should be...”</p>
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Policy DM24 Managing and Reducing Flood Risk

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RDM35	DM 24	Not Stated	Not Stated	Flood risk arising from breach of Reservoirs not adequately covered	It should be made clear which, or both, of these documents are provided in evidence: Haringey's Strategic Flood Risk Assessment 2103 and JBA's Flood Risk Assessment 2015. Both documents state that bedrooms should not be located in basements within areas indicated in NRIM. It is not clear from policy if these recommendations apply.	DM18 (B) states that habitable rooms will not be permitted in basements in areas prone to flooding. JBA's SFRA replaces and updates the North London Level 1 SFRA and replaces the SFRA issued by Haringey in March 2013. Therefore, the relevant and up to date evidence study is the SFRA 2015. This detail will be updated for accurate referencing. No change.
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27 DM28	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.	In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations,	Additional text to paragraph 4.77 as follows: <u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u>

						<p>it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account.</p> <p>We recommend that you include our suggested wording below to address this.</p> <p><i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i></p>	
51	RDM165	DM24, DM25, DM26	Not Stated	Not Stated	<p>Flood Risk, Surface Drainage Systems and Critical Drainage Areas</p> <p>These three policies should be more closely linked with</p>	<p>These three policies should be more closely linked with regards to the potential impacts and mitigation measures.</p>	<p>The Council considers that the Local Plan presents an appropriate framework for managing flood risk, consistent with the NPPF. Comments in respect of Critical Drainage Areas are noted. The Council</p>

					<p>regards to the potential impacts and mitigation measures. Whilst Sustainable Drainage Systems are important across the borough, they are critical up catchment from the Critical Drainage Areas. In Critical Drainage Areas it is important that development does not displace potential flood water onto nearby sites. The impacts of flooding in Critical Drainage Areas may be as great as in Flood Zones 2 and 3a.</p>		<p>agrees that a rigorous approach is needed to assess impacts of development in all vulnerable areas. Therefore, the overarching Policy DM 24 (Managing and Reducing Flood Risk) provides that site specific Flood Risk Assessments will be required for all proposals in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has identified critical drainage problems. FRAs will provide a basis for consideration of site specific issues in respect of impacts and appropriate mitigation.</p> <p>No change.</p>
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Policy DM25 Sustainable Drainage Systems

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the	In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to	<p>Additional text to paragraph 4.77 as follows:</p> <p><u>The Environment Agency requires that Flood Risk Assessments take into</u></p>

		DM28			<p>updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.</p>	<p>factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account.</p> <p>We recommend that you include our suggested wording below to address this. <i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i></p>	<p><u>account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u></p>
51	RDM165	DM24, DM25, DM26	Not Stated	Not Stated	<p>Flood Risk, Surface Drainage Systems and Critical Drainage Areas These three policies should be</p>	<p>These three policies should be more closely linked with regards to the potential impacts and mitigation measures.</p>	<p>The Council considers that the Local Plan presents an appropriate framework for managing flood risk, consistent with the NPPF. Comments in respect of Critical Drainage Areas are</p>

					<p>more closely linked with regards to the potential impacts and mitigation measures. Whilst Sustainable Drainage Systems are important across the borough, they are critical up catchment from the Critical Drainage Areas. In Critical Drainage Areas it is important that development does not displace potential flood water onto nearby sites. The impacts of flooding in Critical Drainage Areas may be as great as in Flood Zones 2 and 3a.</p>		<p>noted. The Council agrees that a rigorous approach is needed to assess impacts of development in all vulnerable areas. Therefore, the overarching Policy DM 24 (Managing and Reducing Flood Risk) provides that site specific Flood Risk Assessments will be required for all proposals in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has identified critical drainage problems. FRAs will provide a basis for consideration of site specific issues in respect of impacts and appropriate mitigation.</p> <p>No change.</p>
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Policy DM26 Critical Drainage Areas

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
35	RDM125	Policy	Yes	Not stated	Sport England supports the	None stated	Support noted.

		DM26 Para A.			<p>strengthened wording that recognises the loss of open space as acceptable, where evidence shows that the open space is surplus to requirements.</p> <p>It is understood that Haringey is undertaking a Playing Pitch Strategy in liaison with Sport England.</p> <p>This work should be allowed to be concluded and the outcomes fed into Policy, making it more robust; linking to the evidence base that sits behind it.</p>		<p>Unfortunately work on the Playing Pitch Strategy has not progressed as rapidly as hoped and should not hold up the adoption of the Local Plan but be included, where appropriate, in any subsequent review, noting that the Strategy itself would be a material consideration where relevant to the determination of a planning application.</p>
51	RDM165	DM24, DM25, DM26	Not Stated	Not Stated	<p>Flood Risk, Surface Drainage Systems and Critical Drainage Areas</p> <p>These three policies should be more closely linked with regards to the potential impacts and mitigation measures. Whilst Sustainable Drainage Systems are important across the borough, they are critical up catchment from the Critical Drainage Areas. In Critical Drainage Areas it is important that development does not displace potential flood water onto nearby sites. The impacts of flooding in Critical Drainage Areas may be as great as in Flood Zones 2 and 3a.</p>	<p>These three policies should be more closely linked with regards to the potential impacts and mitigation measures.</p>	<p>The Council considers that the Local Plan presents an appropriate framework for managing flood risk, consistent with the NPPF. Comments in respect of Critical Drainage Areas are noted. The Council agrees that a rigorous approach is needed to assess impacts of development in all vulnerable areas. Therefore, the overarching Policy DM 24 (Managing and Reducing Flood Risk) provides that site specific Flood Risk Assessments will be required for all proposals in Flood Zones 2 and 3, or in an area within Flood Zone 1 which has identified critical drainage problems. FRAs will provide a basis for consideration of site specific issues in respect of impacts and appropriate mitigation.</p>

						No change.
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Policy DM27 Protecting and Improving Groundwater Quality and Quantity

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27 DM28	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.	In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account. We recommend that you include our suggested wording below to address this. <i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i>	Additional text to paragraph 4.77 as follows: <u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u>

Policy DM28 Watercourses and Flood Defences

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
46	RDM153	DM19 DM 21 DM23 DM24 DM25 DM27 DM28	Yes	Yes	We are pleased to note the inclusion of our comments from the Regulation 18 consultation in the updated Development Management DPD. We find policies; DM19, DM21, DM23, DM24, DM25, DM27, DM28 to be sound.	<p>In March 2016 we published revised climate change allowances. The revised allowances are based on improved climate science and reflect the catchment characteristics within each river basin district. We are expecting applicants to factor the revised climate change allowances into their Flood Risk Assessments rather than the previous 20% for peak river flow. For some development types and locations, it is important to assess a range of risk using more than one allowance. The extent, speed and depth of flooding shown in the assessment should be used to determine the flood level for flood risk mitigation measures. Given the advanced stage of these DM policies we have not requested that these changes to the climate change allowances be included in a policy. We do suggest that you include the wording below in the additional wording for policy DM24, as sites coming forward will be required to take the new levels into account.</p> <p>We recommend that you include our suggested wording below to address this.</p> <p><i>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</i></p>	<p>Additional text to paragraph 4.77 as follows:</p> <p><u>The Environment Agency requires that Flood Risk Assessments take into account the hazard posed to the development by climate change. These should form the basis of any flood risk assessment submitted for sites at risk of fluvial flooding.</u></p>

Policy DM29 On-Site Management of Waste Water and Water Supply

No comments received

Policy DM30 New Waste Facilities

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
15	RDM72	DM 30	No	Yes	The Authority considers that there is a lack of clarity regarding what the phrase “to achieve levels” means . As waste facilities will be permitted (or exempt from environmental permitting) by the Environment Agency, the permit will set the prescribed levels for compliance on a range of environmental criteria. The reference to ‘achieving levels’ is unclear in terms of what levels it is referring to and adds confusion given the permitting requirements which will also apply.	The Authority suggests that the following changes are made to this policy (the proposed changes are listed in bold italics): “..... that any impacts caused by the operation of the facility can be controlled to achieve levels that <i>such that the facility</i> will not have a significant adverse effect on human health and the environment <i>in line with regulatory requirements.</i>”	Agreed. The suggested changes will be included in a schedule of proposed minor modifications.

Policy DM31 Sustainable Transport

No comments received

Policy DM32 Parking

No comments received

Policy DM33 Crossovers, Vehicular Access and Adopting Roads

ID	Rep ID	Policy	Sound	Legally	Reason	Change Sought	Council's
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		/ Para / Figure		Compliant			Comments / Response
10	RDM36	DM 33	Not Stated	Not Stated	This policy is welcomed	Not stated specifically.	Support noted.
11	RDM54	DM 33	Yes	Yes	Not stated specifically.	Not stated specifically.	Noted.
37	RDM129	DM33	Not Stated	Not Stated		<p>Proposed Additions (shown in red) :</p> <p>POLICY DM33:</p> <p>CROSSOVERS, VEHICULAR ACCESS AND ADOPTING ROADS</p> <p>A</p> <p>The Council will only support a proposal for a crossover or new vehicular access where it is demonstrated that the proposal does not result in:</p> <p>a A reduction in pedestrian or highway safety; or</p> <p>b A reduction of on-street parking capacity within a Controlled Parking Zone; or</p> <p>c A visual intrusion to the street scene.</p> <p>B</p> <p>New access roads to new development will only be adopted where they:</p> <p>a Serve a large number of residential dwellings (generally greater than 200 units);</p> <p>b Form a link to the highway network; and</p> <p>c Form a useful extension to an existing highway.</p>	<p>The suggested change does not add any benefit to the policy.</p> <p>No change.</p>
38	RDM131	DM	Not	Not Stated	Not stated	Proposed amendments/ additions marked in red and	The suggested

		33	Stated			<p>deletions marked in green – see below:</p> <p>(Council note: For formatting reasons, proposed additions have been made bold and deletions in strikethrough. See original response for colour coding).</p> <p>A The Council will only support a proposal for a crossover or new vehicular access where it is demonstrated that the proposal does not result in:</p> <p>a A reduction in pedestrian or highway safety; or b A reduction of on-street parking capacity within a Controlled Parking Zone; or c A visual intrusion to the street scene.</p>	<p>change does not add any benefit to the policy.</p> <p>No change.</p>
38	RDM133	DM 33 DM 34	Not Stated	Not Stated	Not stated	Footnote 2: The amendments proposed here are consistent with the submission made by the Hornsey Historical Society to which reference should be made	Noted.
39	RDM134	DM 33 DM 34	Not Stated	Not Stated	These two policies are inextricably linked and the provision of car parking space in front gardens of residential properties and part A of Policy DM33 requires further consideration and stronger	<p>In most residential areas within CPZs proposals to permit a vehicular access for car parking on a front garden would fail to meet all the tests set out under DM33A. Where there is no CPZ there would be a loss of on street car parking space which in most Haringey streets is at a premium.</p> <p>The reference to visual intrusion does not adequately cover the effects of creating car parking in front gardens which usually involves removing part of the garden wall and the creation of a hard surface. This is only partially dealt with in DM34. It should be made clear that this policy relates to a dwelling house and that permitted development rights do not apply to houses converted into flats.</p>	Disagree. The Council considers DMs 33 and 34 along with DM32 to be the most appropriate approach and sufficiently robust to manage parking and crossovers, and driveways and front gardens in relation to flood

					<p>policies particularly in respect of properties within a Conservation Area.</p>	<p>While recognising that the powers of the Council are limited because of permitted development rights we consider that there should be stronger policies to deal with the effects of car parking in front gardens in Conservation Areas where, in many instances, the provision of a car parking space with the attendant destruction of garden walls detracts from the character and appearance of the area. Ideally the Council would make an Article 4 Direction to make it necessary to obtain permission to demolish any front garden wall in a Conservation Area. As express permission is required if a wall is over 1 metre high this should be made clear in Para. 5.13.</p> <p>Policy DM34 should include a statement that the council will require as much as possible of the existing garden wall to be retained and any additional walls to be erected or replaced to be in keeping with the existing. In addition there should be a requirement that permission will not be granted where the size of the garden is insufficient to reasonably accommodate a vehicle and where the configuration of the site would result in a vehicle manoeuvring in or out of the site in a manner dangerous to road traffic and pedestrians.</p> <p>In DM34 it states that the Council will require a minimum of 50% of existing soft landscaping to be retained whereas Para. 5.13 states “..... will seek the retention of 50% of the garden as soft landscaping..” which is not the same thing. This should be redrafted appropriately.</p>	<p>risk and local character.</p> <p>Proposals affecting Conservations Area will be assessed against all relevant policies.</p> <p>No change.</p>
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Policy DM34 Driveways and Front Gardens

ID	Rep ID	Policy / Para	Sound	Legally Compliant	Reason	Change Sought	Council's Comments /
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		/ Figure					Response
10	RDM37	DM 34	Not Stated	Not Stated	This policy is welcomed	Not stated specifically.	Support noted.
11	RDM55	DM 34	Yes	Yes	Not stated specifically.	Not stated specifically.	Noted
37	RDM130	DM34	Not Stated	Not Stated		<p>Proposed Additions (shown in red):</p> <p>POLICY DM34:</p> <p>DRIVEWAYS AND FRONT GARDENS</p> <p>A</p> <p>The Council will only permit parking on front gardens where a minimum of 50% BY AREA[<i>of existing</i>] of the relevant front garden is retained as or made into soft landscaping [<i>area is being retained</i>]. Any hard standing should have drainage provision within the curtilage of the property and reduce flooding through the use of a permeable paving material.</p> <p>B</p> <p>In a Conservation Area, where demolition of a boundary wall is needed for vehicle access, Conservation Area consent is required for removal of all or any part of a front boundary walls, gate, railing or hedge where any part of the relevant wall, gate railing or hedge exceeds 1metre in height. Conservation Area consent will normally be refused for proposals which fail to preserve or enhance the character or appearance of a Conservation Area as a result of the loss or disruption of these features</p>	<p>Disagree. The Council considers DM34 to be the most appropriate approach and sufficiently robust to manage driveways and front gardens in relation to flood risk and local character.</p> <p>Conservation area consent no longer exists, it is just planning permission. Proposals affecting Conservations Area will be assessed against all relevant policies.</p>

							No change.
38	RDM132	DM 34	Not Stated	Not Stated	Not stated	<p>Proposed amendments/ additions marked in red and deletions marked in green – see below:</p> <p>(Council note: For formatting reasons, proposed additions have been made bold and deletions in strikethrough. See original response for colour coding).</p> <p>A The Council will only permit parking on front gardens where a minimum of 50% of existing soft landscaping area is being retained. Any hard standing should have drainage provision within the curtilage of the property and reduce flooding through the use of a permeable paving material.</p> <p>B In a conservation area, where demolition of a boundary wall is needed for vehicle access, Conservation Area consent is required for removal of all or any part of front boundary walls, gates or railings where any part of these exceeds 1m in height. Conservation Area consent will normally be refused for proposals which fail to preserve or enhance the character or appearance of a conservation area as a result of the loss or disruption of these features</p> <p>Footnote 1: The additional paragraph B above (in red) is derived from an accepted and non-controversial part of previous policy SPG1b.</p>	<p>Disagree. The Council considers DM34 to be the most appropriate approach and sufficiently robust to manage driveways and front gardens in relation to flood risk and local character.</p> <p>Conservation area consent no longer exists, it is just planning permission. Proposals affecting Conservations Area will be assessed against all relevant policies.</p> <p>No change</p>
38	RDM133	DM 33 DM 34	Not Stated	Not Stated	Not stated	Footnote 2: The amendments proposed here are consistent with the submission made by the Hornsey Historical Society to which reference should be made	Noted.

39	RDM134	DM 33 DM 34	Not Stated	Not Stated	<p>These two policies are inextricably linked and the provision of car parking space in front gardens of residential properties and part A of Policy DM33 requires further consideration and stronger policies particularly in respect of properties within a Conservation Area.</p>	<p>In most residential areas within CPZs proposals to permit a vehicular access for car parking on a front garden would fail to meet all the tests set out under DM33A. Where there is no CPZ there would be a loss of on street car parking space which in most Haringey streets is at a premium.</p> <p>The reference to visual intrusion does not adequately cover the effects of creating car parking in front gardens which usually involves removing part of the garden wall and the creation of a hard surface. This is only partially dealt with in DM34. It should be made clear that this policy relates to a dwelling house and that permitted development rights do not apply to houses converted into flats.</p> <p>While recognising that the powers of the Council are limited because of permitted development rights we consider that there should be stronger policies to deal with the effects of car parking in front gardens in Conservation Areas where, in many instances, the provision of a car parking space with the attendant destruction of garden walls detracts from the character and appearance of the area. Ideally the Council would make an Article 4 Direction to make it necessary to obtain permission to demolish any front garden wall in a Conservation Area. As express permission is required if a wall is over 1 metre high this should be made clear in Para. 5.13.</p> <p>Policy DM34 should include a statement that the council will require as much as possible of the existing garden wall to be retained and any additional walls to be erected or replaced to be in keeping with the existing. In addition there should be a requirement that permission will not be</p>	<p>Disagree. The Council considers DMs 33 and 34 along with DM32 to be the most appropriate approach and sufficiently robust to manage parking and crossovers, and driveways and front gardens in relation to flood risk and local character.</p> <p>Proposals affecting Conservations Area will be assessed against all relevant policies.</p> <p>No change.</p>
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						<p>granted where the size of the garden is insufficient to reasonably accommodate a vehicle and where the configuration of the site would result in a vehicle manoeuvring in or out of the site in a manner dangerous to road traffic and pedestrians.</p> <p>In DM34 it states that the Council will require a minimum of 50% of existing soft landscaping to be retained whereas Para. 5.13 states “..... will seek the retention of 50% of the garden as soft landscaping..” which is not the same thing. This should be redrafted appropriately.</p>	
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Policy DM35 Cycle Storage in Front Gardens

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RDM38	DM 35	Not Stated	Not Stated	This policy is welcomed	Not stated specifically.	Support noted.
11	RDM56	DM 35	Yes	Yes	Not stated specifically.	Not stated specifically	Noted

Policy DM36 Mini Cab Offices

No comments received

Policy DM37 Maximising the Use of Employment Land and Floorspace

No comments received

Policy DM38 Employment-Led Regeneration

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
16	RDM8	DM 38	Not	Not Stated	The policy supports proposals for	DM 38	Local Plan Policy SP 8 sets out the

	2		Stated		<p>mixed use development within a LEA – Regeneration Area (RA), where this is necessary to facilitate the renewal and regeneration, including intensification, of existing employment land and floorspace. However, this represents repetition of Strategic Policy SP8 which states that RAs can include uses appropriate in a mixed use development including residential uses, and Policy SP1 identifies Wood Green/Heartlands as a Growth Area, where development is required to maximise opportunities. Whilst we do not object to the principle of supporting mixed use development in RAs, we are concerned with the number of criteria for proposals for mixed use development:</p> <p>It is noted that Paragraph 6.14 in relation to criterion a) states that applicants will be required to submit a viability assessment that demonstrates the proposed mixed use is necessary to enable the delivery of employment uses, and mixed use proposals will not be acceptable unless the introduction of a non-employment use is demonstrably</p>	<p>represents repetition of Strategic Policy SP8 which states that RAs can include uses appropriate in a mixed use development.</p> <p>Criterion DM 38 A (a) should be removed as it would add an unnecessary requirement to developers to justify the principle of mixed use development, which is enshrined in the Strategic Policies particularly in relation to sites allocated for mixed use redevelopment in the Site Allocation document or in the emerging</p>	<p>strategic approach for managing land within Haringey’s employment land hierarchy. SP 8 provides in-principle support for mixed use development within the LEA-RA designation. DM 38 gives effect to SP 8, providing further detail on LEA - RA, including where mixed-used proposals are appropriate. The Council considers DM 38 is necessary to ensure delivery of the Borough’s spatial strategy.</p> <p>The Council disagrees with the suggested change to remove DM 38 A (a). The Local Plan is clear on the need to protect employment land to meet objectively assessed need and the Borough’s strategic employment target. In line with the NPPF, the Local Plan provides flexibility to respond to market signals, and DM 38 therefore makes allowance for employment enabling mixed use schemes where viability is an issue. The Council is seeking that proposals justify there is demonstrable need for non-commercial uses to cross subsidise and enable employment development – it is not requiring developers to justify the principles of mixed use within LEA-RA, as this has been established through the Local Plan policies.</p>
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				<p>necessary to make the employment development viable. There is no clear justification why this requirement is necessary, as Policy SP8 permits mixed use development within the LEA - RAs. The policy is considered to be onerous as the term 'employment uses' could be interpreted to mean traditional employment uses (those within B Class uses) whilst employment generating uses are permissible under Policy SP8. Furthermore, Policy SP1 identifies Wood Green/Heartlands as a Growth Area, where both jobs and housing are sought to be delivered through an intensive mixed use development. As such, this criterion should be removed as it would add an unnecessary requirement to developers to justify the principle of mixed use development, which is enshrined in the Strategic Policies particularly in relation to sites allocated for mixed use redevelopment in the Site Allocation document or in the emerging AAP.</p> <p>The criterion seeks to maximise the amount of floorspace to be provided within the mixed use</p>	<p>AAP.</p> <p>As currently worded, it (DM 38 A.c.i) is not unclear what this policy is seeking to achieve. We therefore <i>object</i> to this and suggest the following:</p> <p>"The provision of employment generating floorspace should represent improvements to the existing provision, having regard to..."</p> <p>This should not be expressed as a requirement for development proposals to enable connection to high speed broadband.</p>	<p>With regard to requirements of DM 38 A (b), paragraph 6.14 of the supporting text sets out that the maximum amount of floorspace will be considered having regard the minimum required non-commercial floorspace to make the development viable. The Council does not consider this criterion to be ambiguous. Further, Policy DM 38 A (c) provides that the Council will take into account other factors such as quality of floorspace and number of jobs delivered.</p> <p>The policy seeks to ensure that enabling mixed-use schemes improve the site's suitability for employment generating uses over the plan period, thereby contributing to delivery of the spatial strategy. This may be through the introduction of new employment floorspace, or improvements to existing provision. Objection is noted, but Council disagrees with the suggested change for reasons set out above.</p> <p>As LEA-RA offer flexibility for land uses, the Council considers it appropriate that proposals investigate opportunities for sites to meet identified need for gypsy and traveller accommodation, where</p>
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				<p>scheme having regard to development viability. This requirement is ambiguous and would be difficult to demonstrate the “maximum” amount of employment floorspace that can be achieved on site. This requirement does not take account of the type of employment uses, the quality of employment floorspace and the number of jobs generated from them, and the relationships with other uses proposed within a mixed use development. We therefore object to this requirement as currently worded.</p> <p>The criterion requires provisions of demonstrable improvements in the site’s suitability for continued employment and business use having regard to a number of sub-criterion including provision for an element of affordable workspace, where viable. As currently worded, it is not unclear what this policy is seeking to achieve. We therefore <i>object</i> to this and suggest the following:</p> <p>“The provision of employment generating floorspace should represent improvements to the existing provision, having regard</p>	<p>suitable.</p> <p>With regard to Policy DM 38 A (e), the Council considers that separation of commercial and non-commercial uses is necessary to ensure the protection of amenity for all site uses and occupants, as well as to ensure that the integrity of the site for employment generating uses is not compromised. No change.</p> <p>In response to comments on telecommunications, a minor modification is proposed so that Policy DM 38 A (g) will read:</p> <p>g) <u>Be designed to</u> enable connection to ultra fast broadband.</p>
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					<p>to...”</p> <p>It is not unclear why proposals in the Regeneration and Growth Areas are required to investigate gypsy and traveller accommodation needs. We request clarification and justification for this for a further opportunity to comment.</p> <p>Residential amenity can be protected by design and appropriate mitigation measures. Therefore, we consider that it is inappropriate to require an adequate “separation of uses,” as it would compromise the development potential for allocated mixed use development sites.</p> <p>We would agree that any proposals should ensure that the employment function of the site and nearby employment sites are not undermined.</p> <p>The NPPF requires Local Planning Authorities to support the expansion of electronic communications network including high speed broadband. However, it is not expressed as a requirement for developers to</p>		
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					provide high speed broadband from development proposals. Whether development can be connected to high speed broadband will depend on the availability of broadband infrastructure. As such, this should not be expressed as a requirement for development proposals to enable connection to high speed broadband.		
17	RDM88	DM 38	Not Stated	Not Stated	Workspace supports the general approach to this draft policy, but has concerns with the provision of capped commercial rents both in policy SA19 (separate representation) and DM38. There is no supporting evidence looking at viability and we consider that its inclusion goes beyond the spectrum of planning and would be particularly hard to enforce. It is noted that draft Policy DM38(c) (iv) gives consideration to viability when determining affordable rents. Workspace requests that at a minimum viability matters should be expressly noted in the site allocation. If LBH seek to minimise rental income, this will be to the detriment of the type employment space that Workspace deliver and would create unnecessary uncertainty.	Not specifically stated	The policy does not impose capped commercial rents as implied, rather the policy supports flexible use of existing employment buildings and new forms of employment development to meet the needs of occupiers who require different types of workspace, including affordable workspace . Council's viability work in support of its CIL charging schedule shows that commercial rents in the borough are not sufficient to support new build commercial floorspace. The Workspace Viability Study highlights that new businesses are attracted to the borough's affordable workspace provision. The purpose of the DM38Ac(iv) is to ensure affordable workspace can be considered as part of demonstrating improvements in a site's suitability for continued employment and business use.

							No change
20	RDM1 00	DM 38	Not Stated	Not Stated	The maximum amount of employment floorspace (based on scheme viability) should not undermine the ability to ensure the successful occupation of that floorspace. Please refer to the accompanying cover letter (part (d) (iv).	Not specifically stated	Disagree. The Council considers that ensuring occupation of employment floorspace is as much to do with providing the right type and layout, rather than quantum. The Employment Land Review clearly demonstrates demand for additional employment floorspace provision and the Workspace Viability Study sets out how appropriate workspace provision can be achieved. No change
40	RDM1 35	DM38	Not stated	Not stated	Our client is encouraged by Policy DM38's support for mixed-use development within a defined "Local Employment Area – Regeneration Areas" . It goes on to identify additional policy requirements that a scheme must include in order to be considered acceptable. However, our client does not consider Part D, which requires the need to investigate the site's potential to meeting the Borough's identified gypsy and traveller accommodation needs , justified. The main aim of this policy is to maximise the amount of employment accommodation deliverable on a site, through the introduction of a higher value uses such as market residential. The introduction of the need to	d investigate the site's potential to contribute to meeting the Borough's identified gypsy and traveller accommodation needs ; In order to maximise the amount of employment floorspace to be provided in the mixed use scheme, affordable housing provision will not be required;	Local Plan Policy SP 8 sets out the strategic approach for managing land within Haringey's employment land hierarchy . SP 8 states that LEA – RA designation is the most flexible in the hierarchy, and provides in-principle support for mixed use development. DM 38 gives effect to SP 8, providing further detail on LEA - RA, including where mixed-used proposals are appropriate. The Council considers DM 38 is necessary to ensure delivery of the Borough's spatial strategy . All new residential development, including mixed-use schemes, will be expected to provide a mix of housing in line with DMs10, 11, and 13.

					<p>investigate accommodating gypsy and traveller accommodation would have a similar, if not bigger, impact as having to include affordable housing into a mixed use scheme i.e. the level of deliverable employment floorspace would be significantly reduced.</p> <p>In order for this approach to be considered effective, there is a need to define in the wording of the policy that the provision of affordable housing would not be required, as the introduction of residential units is only considered acceptable where it seeks to facilitate the maximum provision of employment floorspace including where possible capped rents. We propose the following amendment to Policy DM38(d):</p>		<p>As LEA-RA offer flexibility for land uses, the Council considers it appropriate that proposals investigate opportunities for sites to meet identified need for gypsy and traveller accommodation, where suitable.</p> <p>No change.</p>
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Policy DM39 Warehouse Living

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
23	RDM109	DM 39	Not stated	Not stated	Provewell support the inclusion of policy promoting Warehouse Living within the Haringey Warehouse District. Whilst Provewell accept an element of employment floorspace re-provision within the district, it is considered that the wording of the	Not stated specifically	Part B seeks to establish the lawful planning uses on the site. If the site benefits from lawful development certificates

					<p>policy is too restrictive. The policy states in C: The preparation of a masterplan will have regard to the following matters: B The lawful planning uses on site, establishing the existing baseline with respect to the intensification of the employment offer and re-provision of the host community; C The quantum of commercial floorspace to be retained, re-provided, increased, and the resulting increase in employment density to be achieved having regard to the baseline at (b);</p> <p>The policy outlined above seeks to re-introduce employment uses to the site, focussing on the intensification and re-provision of employment floorspace, Prowevell consider that this emphasis is overly restrictive, does not allow for adequate flexibility, and in the case of Arena Design Centre, which as detailed above is no longer desirable to businesses, would inhibit future development opportunities, to the detriment of the existing community and surrounding areas. Employment should be instead measured on density, rather than floorspace; employment re-provision should be met through the number of jobs rather than the amount of floorspace. The current floorspace creates space for 1 job per 45sqm; however redevelopment of the site will allow for 1 job per 10sqm, thus increasing capacity. Replacement floorspace will be of a far greater quality which would enable an increase in employment densities, and is therefore likely to generate significant employment opportunities from redevelopment proposals.</p>		<p>then this is taken into account in establishing the baseline position. It is also important to bear in mind that the sites are employment land, and therefore the retention of the employment floorspace and its intensification is consistent with this designation. The Council disagrees with the suggestion that the sites are no longer desirable to businesses, as our evidence suggests there are a range of different businesses working out of the Warehouse Living estates and demand being created through inner London provision being effective squeezed out. The policy allows for redevelopment to make these sites more suitable for both business and warehousing living use, and the requirement for a masterplan ensures sufficient flexibility.</p> <p>No change</p>
49	RDM157	DM39	Not	Not stated	It is also noted that Haringey has made provision for	Not	Noted. These policies

			stated	<p>proposals for warehouse living within the Haringey Warehouse District as defined in the Site Allocations Local Plan. A number of these sites allocations are situated at the Borough boundary. Policy DM39: Warehouse Living set out the criteria which proposals for warehousing living will be assessed against.</p> <p>Live / work arrangements are not supported under Hackney's existing Development Plan due to the historical loss of employment floorspace in the Borough through residential conversions and the difficulty in regulating the work component. Whilst the DM39 considers controls over management and warehouse living space, there is a concern that this policy may potentially create a number of land-use and enforcement problems in the future if not monitored rigorously.</p> <p>The Council would welcome further discussion with Haringey officers to understand how the employment policies within the DMDPD (in particular DM39), and allocations within SADPD have been underpinned by the Council's Employment Land Study and Economic Growth Assessment.</p>	specifically stated	<p>respond to issues experienced in respect of unauthorised uses in Haringey's designated employment areas. By legitimising warehouse living through the statutory development plan, ensuring transparency around control and management around the different uses on these sites, the Council is seeking to ensure that the outcomes are enforceable. Part E of the Policy reflects the experiences of Hackney and other London boroughs and resists proposals for Live/Work units anywhere in the borough's employment land stock.</p> <p>Haringey Council notes that since this response was submitted, it has held a meeting with Hackney officers, in line with the Duty to Cooperate, where the emerging Local Plan policies were discussed.</p> <p>No change</p>
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Policy DM40 Loss of Employment Land and Floorspace

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RDM39	DM 40	Not Stated	Not Stated	<p>Loss of employment floorspace. The policy as written is unsound</p> <p>Where a development involves demolition of a building containing employment floorspace, the same area of floorspace must be provided in the proposed building. Replacing lost floor space elsewhere will reduce flexibility and vitality of economic activity essential for growth. Using Section 106 monies for training loses the floor space altogether and would therefore be unacceptable.</p>	Not stated specifically.	<p>Disagree. Para 22 of the NPPF states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. It goes on to state that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The Council considers DM40, along with other relevant policies, complies with the NPPF and is the most appropriate approach to managing the loss of non-designated employment land and floor space.</p> <p>No change.</p>
11	RDM57	DM	Not	Not Stated	Loss of employment floorspace. The policy	Where a	Disagree. Para 22 of the NPPF

		40 B	Stated		as written is unsound.	<p>development involves demolition of a building containing employment floorspace, the same area of floorspace must be provided in the proposed building. Replacing lost floor space elsewhere will reduce flexibility and vitality of economic activity essential for growth. Using Section 106 monies for training loses the floor space altogether and therefore unacceptable .</p>	<p>states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. It goes on to state that where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities. The Council considers DM40, along with other relevant policies, complies with the NPPF and is the most appropriate approach to managing the loss of non-designated employment land and floor space.</p> <p>No change.</p>
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12	RDM62	DM40	No	Not stated	<p>As previously drafted, Policy DM52: ‘Loss of employment land and floorspace’ of the Development Management Policies Preferred Option Consultation (February 2015) made provision for the loss of employment floorspace to non-employment uses, subject to a number of criteria. These included that the site was no longer suitable or viable for its existing or an alternative business or industrial use; or a change of use was required to enable site redevelopment as part of a strategically coordinated regeneration scheme or programme, with demonstrable wider community benefits that outweigh those of retaining the land exclusively for industrial and business use. Supporting paragraph 5.26 of DM52 stated:</p> <p>“The Council will strongly resist proposals involving the loss of employment land. However, in line with the National Planning Policy Framework, it is important to promote economic development by ensuring that sites are not needlessly protected when there is no reasonable prospect of them coming forward for specific types of development.”</p> <p>As previously drafted, Policy DM52 did not exclude designated employment land from conversion to non-employment uses, where the criteria were met. Policy DM52 is similar to Haringey Unitary Development Plan (UDP) Policy EMP4 Saved (March 2013): ‘Non Employment Generating Uses’</p>	Not stated	<p>The Council has prepared an up-to-date technical evidence base to inform Local Plan preparation. This includes the Employment Land Study (2015) which clearly sets out future long-term employment land and floorspace requirements for B Class (commercial and industrial) uses, and therefore supports the strategic approach to safeguard Haringey’s designated and non-designated employment sites, as set out in SP 8. This approach is considered to be in general conformity with the London Plan.</p> <p>Through the Local Plan process, the Council has undertaken a review and reconfiguration of its employment land portfolio, taking account of local evidence and having regard to market signals, to designate SIL and LSIS for safeguarding, and LEA, where more a flexible approach to land uses will be permitted. Through this process some sites have changed designation (i.e. changed from LSIS to LEA). The approach is considered to be consistent with NPPF paragraph 22. It is noted that the LEA-RA</p>
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				<p>which allows for, subject to criteria, the redevelopment or change of land and buildings in an employment generating use. Again, policy EMP4 does not exclude designated employment land from changes of use.</p> <p>As currently drafted, Policy DM40: ‘Loss of Employment Land and Floorspace’ of the Development Management DPD Pre-Submission Version (January 2016), now only applies to non-designated employment land. The draft policy also introduces a sequential approach to delivering alternative uses.</p> <p>THFC object to the application of policy DM40 to only non-designated employment sites. The exclusion of designated employment sites would be inconsistent with paragraph 22 of the NPPF which states: “Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.”</p>	<p>designation provides a positive framework for delivering appropriate area base regeneration in accordance with the Spatial Strategy.</p> <p>Policy DM 40 sets out criteria for considering proposals on non-designated sites where a loss of employment land and floorspace is proposed. The Local Plan has been amended from the Regulation 18 (February 2015) version to remove similar ‘tests’ for loss of employment land and floorspace for designated sites. This is owing to the need to safeguard these sites to meet objectively assessed need and the Borough’s strategic employment target, and to ensure these sites are not compromised by the introduction of inappropriate non-employment uses in order to deliver the Spatial Strategy.</p>
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				<p>The Government's recommended methodology in Planning Practice Guidance for planning for future economic development needs recommends (Reference ID: 2a-032-20140306) that provision should be based on sectoral and employment change, demographic change and associated employment needs, analysis of past take-up and future sectoral requirements, and consultation with relevant organisations, studies of business trends, and monitoring of business, economic and employment statistics. Tottenham is an identified area of significant population, demographic and sectoral (economic) change and policy should reflect that.</p> <p>This point is evidenced in the change in employment by sector experienced in Tottenham in recent years. As can be seen in the figure below, Tottenham has seen its most significant decline in jobs in the manufacturing sector: (SEE REP FOR Figure 1 Graphic)</p> <p>Whilst Figure 1 may suggest that employment in transport and storage sectors has increased, a more fine-grained approach indicates that this recent growth is mainly accounted for by industries such as computer programming and other telecommunications activity, and road and rail transport (altogether accounting for</p>		
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				<p>90% of net growth in the Transport, Storage, Comms and Information sector) rather than in traditional warehousing or manufacturing-related sectors (based on analysis of 4-digit SIC level Annual Business Inquiry and Business Register and Employment Survey data 2003-2013).</p> <p>Based on London-wide sectoral forecasts from the London Plan (2015), this change is anticipated to continue to reduce the need for protection of this type of employment space over the plan period due to a downturn in the number of jobs it is projected to create: (See rep for Figure 2 Graphic)</p> <p>Coupled with this, existing demand for employment by current residents (based on JSA sought occupation, DWP, 2015) is overwhelmingly for personal service, sales and customer service roles. Industrial jobs were sought by only 1 in 5 unemployed people in the area. In fact more of Haringey's unemployed were seeking management, professional and associate professional jobs than were looking for jobs in industry. The following chart shows the mis-match between sought occupations of existing unemployed residents and the type of jobs protected by traditional warehouse sectors: (See rep for Figure 3 graphic)</p> <p>Given these changes in the employment</p>		
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				<p>and demographic make up in Tottenham, clear policies should be in place to allow designated employment sites to be redeveloped where there is no reasonable prospect of the site being used for the allocated employment use.</p> <p>The exclusion from policy DM40 is also inconsistent with Strategic Policy SP8: 'Employment' which states that Locally Significant Industrial Sites (LSIS) will be safeguarded where they continue to meet demand and the needs of modern industry and business. A clear provision should be made for the redevelopment of LSIS, or parts of LSIS, which don't meet the demands and needs of modern industry and business.</p> <p>The tests set out in saved UDP Policy EMP4 and Preferred Options Policy DM52 provide adequate criteria to rigorously assess whether or not the loss of employment land was acceptable and there is no reason why the policy has been changed in the Pre-Submission version of the document.</p> <p>It is also unclear why the link in Preferred Options Policy DM52 to strategically coordinated regeneration schemes or programmes has been taken out. THFC are currently bringing forward redevelopment proposals at 500 White Hart Lane for a mixed use residential-led scheme and a</p>		
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					<p>planning application was submitted on 4 March 2016. The 500 White Hart Lane site occupies part of an LSIS, albeit it is partly vacant and the site as a whole is significantly underutilised. Through the redevelopment of the site, there is the opportunity to help the regeneration of the Love Lane housing estate in Tottenham through the early decant of Love Lane residents to the 500 White Hart Lane site. The scheme has been designed to meet Haringey's Regeneration Team's requirements and in conjunction with prospective residents. This has a clear link to the Pre-submission version of Strategic Policy SP2: 'Housing' which supports strategic improvements of Haringey's housing estates (including Love Lane). The removal of a reference to strategically coordinated regeneration schemes within the loss of employment land/floorspace policy could therefore make it more difficult for such schemes to come forward.</p> <p>Overall and for the reasons set out above, THFC consider that Pre-submission policy DM40 is not justified as it is not the most appropriate strategy when considered against the reasonable alternatives, effective or consistent with national planning policy and is therefore as drafted unsound.</p>		
13	RDM67	DM 40	Not Stated	Not stated	As stated in previous representation, in relation to draft Policy DM40 Ab), there is no evidence to suggest why a three-year	No response given.	The policy requirements for site marketing have been set in line with London Plan

					marketing campaign is required. It is typical in other London boroughs to exercise periods of 12 months. The NPPF resists the long term protection of sites, where there is no reasonable prospect of the site being used for that purpose, having consideration to market signals and relative need for different land uses. Given the nature of land acquisition and development process this length of time would hinder actual delivery of needed new homes.		Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use. No change.
21	RDM102	DM 40	No	Yes	Policy DM40 A Part b: The suggested criteria against which the loss of employment floorspace will be considered includes documented evidence of an unsuccessful marketing campaign over a period of 3 years. It is considered that a marketing period of 3 years is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. A blanket marketing period of 3 years before alternative uses are permitted will go further to hamper	It is recommended that the policy is revised to allow marketing requirements to be agreed with the Council on a site by site basis once the nature of	The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in

					development. The policy is therefore not effective.	the site and specific issues are fully understood during pre-application discussions.	circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use. No change.
23	RDM110	DM 40	Not stated	Not stated	Prove well consider the requirement to provide 3 years of marketing evidence is overly restrictive. Policy should be more flexible to ensure that employment land continues to meet the demand of the industry, and should market demand change over a period less than 3 years, then policy should be more responsive to this need. The Government favour a flexible response to reallocating redundant employment land, as evidenced by paragraph 22 of the NPPF, and the proposed alterations to the NPPF, which states in paragraph 35 that: <i>a balance needs to be struck between making land available to meet commercial and economic needs, and not reserving land which has little likelihood of being taken up for these uses</i>	Not stated specifically	The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use. No change.
28	RDM118	DM40	Not	Not Stated	Policy DM40 seeks to protect all non-	The policy	The Council considers that

			Stated	<p>designated employment land that does not fall within designated Strategic Industrial Locations, Locally Significant Industrial Sites and Local Employment Areas, in accordance with Local Plan Policy SP8.</p> <p>The current drafting of the policy, when taken as a whole, has the effect of affording the same degree of protection to non-designated employment floorspace and sites as designated employment floorspace and sites.</p> <p>It is not reasonable to seek to provide a blanket protection on all non-designated employment land within the Borough, as this fails to take account of those sites where the loss of an employment use to a more sensitive use is desirable. Further the exception tests are excessively onerous with regard to the requirement for a marketing campaign covering a continuous period of three years in order to justify a change to a non-employment use. This approach is also contrary to the NPPF (paragraph 22), which requires policies to avoid the long term protection of sites allocated for employment use, where there is no reasonable prospect of a site being used for that purpose.</p> <p>Part B of Policy DM40 states that where the Council is satisfied that the loss of non-designated employment land or floorspace is acceptable, it will require new</p>	<p>needs to be redrafted to provide some exception tests where it would be acceptable to support the loss of non-designated employment land where three years marketing evidence is not possible. Saved UDP Policy EMP4 provides reasonable exception tests that could be added to draft Policy DM40 to this effect. Set out below is suggested wording for policy DM40: The Council will seek to retain in</p>	<p>Policy DM 40 is necessary to meet objectively assessed needs for employment land/floorspace and the Borough's strategic employment target.</p> <p>The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land in order to deliver the Borough's spatial strategy. The Council does not consider 3 years to be excess or within the definition of 'long term protection' given that once lost to non-employment use such sites never return to employment use and reduce the Borough's economic stock and potential. Further, the Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is</p>
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				<p>development proposals to apply a sequential approach to delivering an alternative use, prioritising community infrastructure, followed by mixed use development that includes employment generating and/or community uses and lastly residential use. This again is overly onerous and is contrary to the policy aspirations of the NPPF (paragraph 22), as the wording fails to treat proposals for alternative uses on their merits, having no regard to market signals , nor the relative need for different land uses to support sustainable local communities. KA Investments is therefore of the view that this part of the policy is unsound and should be removed.</p>	<p>employment use any non-designated employment floorspace and sites and planning permission will only be granted to redevelop or change the use of non-designated employment land and floorspace provided:</p> <p>a) the land or building is no longer suitable for business or industry use on environmental, amenity and transport grounds in the short, medium and long term; and</p>	<p>no demonstrable demand for that use.</p> <p>Where a loss of non-designated employment land or floorspace is acceptable, the Council considers that a sequential approach to investigating alternative uses is consistent with the NPPF and appropriate to support delivery of the spatial strategy. Where alternative uses are considered, applicants may use evidence to demonstrate why certain uses are not deliverable (e.g. viability or other site specific circumstances).</p> <p>No change.</p>
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						<p>b) there is well documented evidence of an unsuccessful marketing/advertisement campaign, including price sought over a period of normally 18 months in areas outside the DEAs, or 3 years within a DEA; or</p> <p>c) the redevelopment or re-use of all employment generating land and premises would retain or increase the number of jobs permanently provided on the site, and</p>	
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						<p>result in wider regeneration benefits.</p> <p>Part B of Policy DM40 is unsound and should be removed.</p>	
50	RDM158	DM 40	Not Stated	Not Stated	<p>Highgate Capital LLP seek further to make representations to the wording outlined within emerging policy DM40 which seeks to regulate the loss of non-designated employment land and floorspace to a non-employment use.</p> <p>Supporting text at paragraph 6.26 of the pre-submission document states that; “Where a loss of non-designated employment land or floorspace is proposed the Council will require that applicants submit a statement and evidence demonstrating that the site is no longer suitable or viable for the existing or an alternative employment use. Considerations may include access, compatibility of adjoining uses, site size and orientation and other potential development constraints”.</p> <p>Where land has been vacant and underutilised for a sustained period of time this should suffice in reasonably justifying a change of use of the site to enable its immediate regeneration.</p> <p>Highgate Capital however consider the</p>	<p>Greater flexibility in the requirement to provide 3 years worth of marketing evidence where loss of employment floorspace is proposed</p>	<p>The policy requirements for site marketing have been set in line with London Plan Supplementary Planning Guidance (Land for Industry and Transport), taking into account local evidence which suggests the need to protect against the loss of employment land and floorspace in order to deliver the Borough’s spatial strategy. The Council considers that paragraph 6.27 provides sufficient flexibility to consider proposals in circumstances where the vacancy period has been less than 3 years; this will ensure sites are not unreasonably protected for employment generating uses where there is no demonstrable demand for that use.</p> <p>No change.</p>

				<p>requirement to provide 3 years marketing evidence overly restrictive, particularly in cases where the use of the land has been vacant for a sustained period of time. In itself, this should mark compelling evidence as to the marketability of the site and further market demand for re-providing such uses on site.</p> <p>Policy should be more flexible to ensure that employment land continues to meet the demand of the industry, and should market demand change over a period less than 3 years, then policy should be more responsive to this need. The Government favour a flexible response to reallocating redundant employment land, as evidenced by paragraph 22 of the NPPF, and the proposed alterations to the NPPF, which states in paragraph 35 that:</p> <p><i>“a balance needs to be struck between making land available to meet commercial and economic needs, and not reserving land which has little likelihood of being taken up for these uses”.</i></p> <p>In addition to this, it is further held within the proposed alterations that timeframes to provide evidence of market interest should be revisited to enable greater avenue towards the release of unused non-designated and indeed designated employment land.</p> <p>A 3 year marketing campaign is therefore too onerous where there is no reasonable prospect of the employment floorspace being used for employment uses, and will</p>		
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					restrict the bringing forward of other viable uses for these sites, leading to vacant buildings that make a negative contribution to Haringey and the wider area. Therefore the policy needs to ensure it is not overly restrictive by imposing a 3 year rule. It must take a more holistic approach considering the surrounding area, the condition of the site and its ability to meet the needs of modern industry. A reduced period of 1-2 years should suffice in such instances.		
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Policy DM41 New Town Centre Development

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
13	RDM68	DM 41	Not Stated	Not stated	No response given.	<p>We suggest that the policy objective is changed to consider the important supporting role housing can play in sustaining vibrant and vital town centres, in light of changing shopping habits, the evidence from the Outer London Commission (third report) and the Experian consumer expenditure survey.</p> <p>Similarly, the policy should make specific reference to encourage a greater density of development within town centre locations which are also often hubs for public transport and sustainable travel in order to ensure the policy is compatible with emerging</p>	<p>Policy SP 11 sets out the Council's strategic approach to town centre development, and paragraph 5.3.19 is clear that housing can play a role in supporting town centre vitality. The DM DPD gives effect to SP 11. Policy DM 41 deals with main town centre uses as defined in the NPPF, and objectives for housing are not considered appropriate in this policy. The Council considers that Policy DM 45 addresses the suggested changes, providing further detail both in regard of housing and the intensification of uses within town centres.</p> <p>No change.</p>

						changes to the National Planning Policy Framework NPPF.	
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Policy DM42 Primary and Secondary Frontages

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
41	RDM136	DM 42	No	Yes	<p>In our view policy DM42 is not Sound as the policy is no 'justified' as it is 'not using the most appropriate strategy' when considered to the alternatives suggested in the Retail Study. In addition, it is not 'effective' as it is not 'flexible' and it is not 'consistent with National Policy'. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.</p> <p>The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with the guidance set out in the London Plan Town Centres SPG.</p> <p>The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>The policy should be re-worded, or as a minimum, significantly loosened to allow for health competition between betting shops. A full explanation can be found in our letter of representation that has been submitted alongside this form.</p>	<p>Disagree. DM42 is about maintaining and supporting the role and function of Haringey's higher order town centres and accords with national and regional policy.</p> <p>Betting shops are specifically addressed in DM46.</p> <p>No change</p>
41	RDM139	Para 6.33 – 6.48 DM 42	No	Yes	<p>In our view some of the paragraphs from 6.33 – 6.48 are not Sound as they are not 'justified' as they do not provide the most appropriate strategy when considered against the alternatives. In addition, they are not considered 'consistent with National Policy (NPPF) or with the London Plan</p>	<p>Remove the threshold figures from Policy DM42 and DM43 for the reasons</p>	<p>Disagree. Policy DM42 and its supporting text seeks to support and maintain the important role and function of</p>

					<p>and Town Centres SPG.</p> <p>It is noted within the text (specifically paragraphs 6.35, 6.37, 6.45 and 6.46) that the thresholds set out in policies DM42 and DM43 are supported by the Retail and Town Centres Study (2013) but on review of the document it is unclear how this conclusion was reached. The study actually suggests that although A1 threshold figures can be adopted, it may be appropriate to consider an alternative criteria on a case by case basis.</p> <p>The onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.</p> <p>The text therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>set out within our accompanying letter.</p>	<p>Haringey's higher order town centres and accords with national and regional policy.</p> <p>Betting shops are specifically addressed in DM46.</p> <p>No change.</p>
41	RDM142	DM 42 DM 43	No	Yes	<p>On review of the Council's pre-submission version of the Local Plan, it is clear that there are many hurdles that applications for betting shop uses need to overcome prior to even being assessed against Policy DM46 on 'Betting Shops'. Applications will also be assessed against Policies DM42 if located within primary and secondary frontages and Policy DM43 if located within a local shopping centre which contain thresholds for non-retail uses.</p> <p>As noted above, Policy DM42 notes that within primary shopping frontages of Metropolitan and</p>	<p>Not specifically stated</p>	<p>The thresholds in DM42 & DM43 apply to all non-retail uses and not just betting shops. The application of the thresholds seeks to support and maintain the important role and function of Haringey's higher order town centres. In particular, ensuring the primary</p>

				<p>District centres, the use of ground floor units for retail, financial & professional services, restaurants & cafes and pubs & bars will be permitted where the overall number of units in nonretail use (including extant planning permissions) will not exceed 35% unless a number of criteria can be satisfied. It is clear, that since betting shops are now considered under Sui Generis use, betting shop uses are not even considered appropriate for these areas. It is not clear however if this is the intention of the policy wording, or whether betting shops have simply fallen off the policy due to the changes to the use classes.</p> <p>In secondary shopping frontages of the Metropolitan and District town centres, it is noted that the use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage unless a number of criteria can be satisfied.</p> <p>Policy DM43 notes that in local shopping centres, the use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage unless a number of criteria can be satisfied.</p> <p>It is noted within the policy supporting text (paragraphs 6.35, 6.37, 6.45 and 6.46) that the thresholds are supported by the Retail and Town Centres Study (2013) (which was published prior to</p>		<p>shopping area is mostly retail shops, with more flexibility provided within secondary and non-designated frontages for more diverse town centre uses. This approach accords with both national and regional policy and is consistent with the local evidence base. The policy does not deal with the clustering of uses, other than at Part C which addresses the potential impacts of over concentrations of similar community uses.</p> <p>No change</p>
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				<p>Betting Shop uses being moved to the Sui Generis so refers to them under the A2 Use Class).</p> <p>However, on review of this document, it is unclear how this conclusion has actually been reached.</p> <p>When discussing the ‘Clustering of Uses’, the document is clear and it actually states:</p> <p>“Our analysis does not suggest that there is any significant clustering of specific uses, such as betting shops, within the town centres. A higher number of these types of uses can be found in the larger centres such as Wood Green, but this reflects the centre’s Metropolitan Centre designation and the proportion of units in these uses remains small” (paragraph15.30);</p> <p>In regards to Local centres and A2-A5 uses it is noted that “our analysis has not identified any clustering in the Local Centres” (paragraph 15.31). The paragraph then goes on to state that the majority of local centres have just 1 betting shop and only 2 centres have more but both are larger local centres;</p> <p>“We therefore do not consider that there is any requirement to control the amount and location of Class A2 and A5 uses at this stage either through an Article 4 Direction or new planning policies” (paragraph 15.32).</p> <p>The study then notes that it may be appropriate to maintain a proportion of AI uses within each centre by providing threshold policy (as provided in the existing UDP) but states further that ‘if considered necessary, a criteria could be included that</p>		
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				<p>requires consideration on a case by case basis to be given to the balance of shops and services where a change of use to Class A2 or A3/A5 is proposed' (paragraph 15.35).</p> <p>Taking this into consideration, it is clear that the study actually suggests that although AI threshold figures can be adopted, it may be appropriate to <u>consider an alternative criteria on a case by case basis</u> where a change to A2 use or A3/A5 uses is proposed.</p> <p>In addition, it is important to note that we had expected the Plan to provide an explanation as to why betting shops are not even considered appropriate within primary shopping frontages and why the <u>specific</u> threshold figures (35%, 50% respectively) have been chosen to assess concentration of uses. Disappointingly the document is silent on this critical point, as well as the Retail Study.</p> <p>A betting shop use is a typical town centre use and when grouped collectively with other 'non-retail' uses will no doubt amount to a high proportion of uses within centres already (prior to the policy being adopted). Many centres across the country and in Haringey are healthy, despite having a high number of non-retail uses.</p> <p>In addition, it should be noted that including extant planning permissions' within the threshold calculations is unreasonable, since many applications may not be implemented but would be required to be considered as part of the</p>		
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				<p>threshold calculation.</p> <p>There is a real danger that adopting such an approach will effectively put a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than out of centre.</p> <p>We strongly suggest that the Council revisits this proposed approach.</p> <p>We are also concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should “promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres”. This is a sentiment echoed in the London Plan (Policy 4.8). Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre. Again, regard needs to be had to the very real impact that the document is likely to have on a number of different industries and the clear conflict that would arise with the NPPF and the London Plan.</p> <p>In this respect, it is considered that the document</p>		
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					is unsound. It is not justified as it is not using the most appropriate strategy when considered to the alternatives suggested in the Retail Study. In addition, it is not effective as it is not flexible and it is not consistent with national policy.		
41	RDM146	DM 42 DM 43 DM 46	No	Not stated	<p>Summary and conclusions</p> <p>In our view policies DM42, DM43 and DM46 and supporting text paragraphs 6.54 – 6.57 are not ‘justified’, ‘positively prepared’ or ‘consistent with national policy’. The policy and reasons are not founded on a robust and credible evidence base. Furthermore, the policy and supporting text is not consistent with national policy nor with the London Plan. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p> <p>We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any clusters or concentrations which would lead to negative impacts, however, to assert unnecessary thresholds as a starting point for all new applications that are not based on a robust and credible evidence base is wholly unsubstantiated and does not allow officers/members to make objective decisions.</p>	<p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council’s betting shop policy provides a good example of a ‘model policy’ that is appropriate and compliant with the aspirations of both regions and local policy. The policy states:</p> <p>“When determining</p>	<p>The Council considers that policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, in particular, town centre vitality and viability.</p> <p>The Council has reviewed Greenwich Council’s betting shop policy and considered it ineffective in not providing any certainty as to how the policy may be applied.</p> <p>No change</p>

				<p>Indeed, many of the centres will have exceeded the thresholds outlined in the policy already, many of the extant planning permissions will not be implemented, and if the decision-makers are told that there is already an issue with betting shop use within the borough, many will naturally conclude that an additional betting shop in an area would result in an area being at high risk of adverse impacts and there will be a tendency to conclude that the application should be refused. This is clearly unacceptable, particularly given that there is not specific robust and credible evidence to back up the document’s presumptions in this regard.</p> <p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council’s betting shop policy provides a good example of a ‘model policy’ that is appropriate and compliant with the aspirations of both regions and local policy. The policy states: “When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this particular type of use”.</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan ‘sound’.</p>	<p>applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this particular type of use”.</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On adoption of the model policy, we would then</p>	
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					We would be grateful if you would take the above comments on board in the preparation of the Plan and request that you keep us informed on further progress and dates for the Examination in Public.	consider the Plan 'sound'.	
42	RDM148	DM42	Not stated	Not stated	<p>DM42 and 43 are already restrictive in their nature and to attempt to impose a 5% cap on the numbers of betting shops in addition to these other proposed restrictions is we believe unlawful and would be susceptible to judicial review on the grounds of unreasonableness. Such restrictions set an unwelcome precedent and William Hill would be minded to challenge as it prejudices the commercial well being of a business that has its headquarters in the Borough. William Hill employs some 250 people in Haringey and the authority should not be introducing a policy which prejudices local jobs (Administration offices and betting shops)</p> <p>Planning evidence held by William Hill (see below) supports the view that betting shops drive considerable footfall and, in attempting to bring forward such a policy, a conflict is created with the Gambling Act 2005. The Authority is under a general duty to aim to permit gambling.</p> <p>Whilst planning and licensing law fall to be considered separately, this proposal clearly creates a conflict of laws. Gambling law specifically deals with issues relating to protecting children and the vulnerable so if this policy is related to the vibrancy and vitality of the high street, then the authority is duty bound to bring forward evidence that (a) there is an "over</p>		<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the "social role" of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey's technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach</p>

				<p>concentration” and (b) that such concentrations would damage the vibrancy and vitality of town or local centres. The plan produces no such evidence and if the authority proposes such restrictions then the onus is on it to provide the substantial evidence required to introduce a policy that is prima facie an interference with legitimate trade.</p> <p>A previous enquiry into betting shops in the Borough did not find any particular evidence of betting shops creating substantial social harm. Problem gambling levels in the UK are low by international standards (0.4%) and probably falling. The Authority have also failed to consider the negative outcomes of an overly restrictive policy in terms of creating a risk that this restriction may cause unmet demand for gambling and a risk of migration to an illegal market.</p> <p>A restrictive policy is also at odds with competition law as it introduces market restriction which has a direct impact on new market entrants.</p>	<p>to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a</p>
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							<p>policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.</p>
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Policy DM43 Local Shopping Centres

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
	RDM137	DM 43	No	Yes	<p>In our view policy DM43 is not Sound as the policy is not 'justified' as it is 'not using the most appropriate strategy' when considered to the alternatives in the Retail Study. In addition, it is not 'effective' as it is not 'flexible' and it is not 'consistent with National Policy'. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.</p> <p>The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with the guidance set out in the London Plan Town Centres SPG.</p> <p>The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>The policy should be re-worded, or as a minimum, significantly loosened to allow for health competition between betting shops. A full explanation can be found in our letter of representation that has been submitted alongside this form.</p>	<p>Disagree. DM43 is about maintaining and supporting the role and function of Haringey's higher order town centres and accords with national and regional policy.</p> <p>Betting shops are specifically addressed in DM46.</p> <p>No change</p>
41	RDM142	DM 42 DM 43	No	Yes	<p>On review of the Council's pre-submission version of the Local Plan, it is clear that there are many hurdles that applications for betting shop uses need to overcome prior to even being assessed against Policy DM46 on 'Betting Shops'. Applications will also be assessed against Policies DM42 if located within primary and secondary frontages and Policy DM43 if located</p>	<p>Not specifically stated</p>	<p>The thresholds in DM42 & DM43 apply to all non-retail uses and not just betting shops. The application of the thresholds seeks to support and maintain</p>

				<p>within a local shopping centre which contain thresholds for non-retail uses.</p> <p>As noted above, Policy DM42 notes that within primary shopping frontages of Metropolitan and District centres, the use of ground floor units for retail, financial & professional services, restaurants & cafes and pubs & bars will be permitted where the overall number of units in nonretail use (including extant planning permissions) will not exceed 35% unless a number of criteria can be satisfied. It is clear, that since betting shops are now considered under Sui Generis use, betting shop uses are not even considered appropriate for these areas. It is not clear however if this is the intention of the policy wording, or whether betting shops have simply fallen off the policy due to the changes to the use classes.</p> <p>In secondary shopping frontages of the Metropolitan and District town centres, it is noted that the use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage unless a number of criteria can be satisfied.</p> <p>Policy DM43 notes that in local shopping centres, the use of ground floor units for appropriate town centre uses will be permitted where the overall number of units in non-retail use (including extant planning permissions) will not exceed 50% across the entire frontage unless a number of criteria can be satisfied.</p>		<p>the important role and function of Haringey's higher order town centres. In particular, ensuring the primary shopping area is mostly retail shops, with more flexibility provided within secondary and non-designated frontages for more diverse town centre uses. This approach accords with both national and regional policy and is consistent with the local evidence base. The policy does not deal with the clustering of uses, other than at Part C which addresses the potential impacts of over concentrations of similar community uses.</p> <p>No change</p>
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				<p>It is noted within the policy supporting text (paragraphs 6.35, 6.37, 6.45 and 6.46) that the thresholds are supported by the Retail and Town Centres Study (2013) (which was published prior to Betting Shop uses being moved to the Sui Generis so refers to them under the A2 Use Class). However, on review of this document, it is unclear how this conclusion has actually been reached. When discussing the ‘Clustering of Uses’, the document is clear and it actually states:</p> <p>“Our analysis does not suggest that there is any significant clustering of specific uses, such as betting shops, within the town centres. A higher number of these types of uses can be found in the larger centres such as Wood Green, but this reflects the centre’s Metropolitan Centre designation and the proportion of units in these uses remains small” (paragraph 15.30);</p> <p>In regards to Local centres and A2-A5 uses it is noted that “our analysis has not identified any clustering in the Local Centres” (paragraph 15.31). The paragraph then goes on to state that the majority of local centres have just 1 betting shop and only 2 centres have more but both are larger local centres;</p> <p>“We therefore do not consider that there is any requirement to control the amount and location of Class A2 and A5 uses at this stage either through an Article 4 Direction or new planning policies” (paragraph 15.32).</p>		
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				<p>The study then notes that it may be appropriate to maintain a proportion of AI uses within each centre by providing threshold policy (as provided in the existing UDP) but states further that 'if considered necessary, a criteria could be included that requires consideration on a case by case basis to be given to the balance of shops and services where a change of use to Class A2 or A3/A5 is proposed' (paragraph 15.35).</p> <p>Taking this into consideration, it is clear that the study actually suggests that although AI threshold figures can be adopted, it may be appropriate to <u>consider an alternative criteria on a case by case basis</u> where a change to A2 use or A3/A5 uses is proposed.</p> <p>In addition, it is important to note that we had expected the Plan to provide an explanation as to why betting shops are not even considered appropriate within primary shopping frontages and why the <u>specific</u> threshold figures (35%, 50% respectively) have been chosen to assess concentration of uses. Disappointingly the document is silent on this critical point, as well as the Retail Study.</p> <p>A betting shop use is a typical town centre use and when grouped collectively with other 'non-retail' uses will no doubt amount to a high proportion of uses within centres already (prior to the policy being adopted). Many centres across the country and in Haringey are healthy, despite having a high number of non-retail uses.</p>		
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				<p>In addition, it should be noted that including extant planning permissions' within the threshold calculations is unreasonable, since many applications may not be implemented but would be required to be considered as part of the threshold calculation.</p> <p>There is a real danger that adopting such an approach will effectively put a moratorium on such new uses in centres and potentially encourage new operators and uses out of centres. Clearly such an approach is inappropriate and would fly in the face of the town centres first policy as set out in the NPPF which seeks to encourage town centre shops and services to locate within centres, rather than out of centre.</p> <p>We strongly suggest that the Council revisits this proposed approach.</p> <p>We are also concerned that the document will conflict with paragraph 23 of the NPPF which states that policies should be positive and promote competitive town centres. Bullet point 4 of this paragraph states that LPAs should “promote competitive town centres that provide customer choice and a diverse retail offer and which reflect individuality of town centres”. This is a sentiment echoed in the London Plan (Policy 4.8). Clearly the document is likely to have a serious impact on particular industries and healthy competition between different operators by preventing new operators from locating within a particular centre. Again, regard needs to be had to the very real impact that the document is likely to have on a</p>		
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					<p>number of different industries and the clear conflict that would arise with the NPPF and the London Plan.</p> <p>In this respect, it is considered that the document is unsound. It is not justified as it is not using the most appropriate strategy when considered to the alternatives suggested in the Retail Study. In addition, it is not effective as it is not flexible and it is not consistent with national policy.</p>		
41	RDM146	DM 42 DM 43 DM 46	No	Not stated	<p>Summary and conclusions</p> <p>In our view policies DM42, DM43 and DM46 and supporting text paragraphs 6.54 – 6.57 are not 'justified', 'positively prepared' or 'consistent with national policy'. The policy and reasons are not founded on a robust and credible evidence base. Furthermore, the policy and supporting text is not consistent with national policy nor with the London Plan. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p> <p>We have no issue with the fact that the Council will want to scrutinise new betting shop applications and ensure that they will not lead to any clusters or concentrations which would lead to negative impacts, however, to assert unnecessary thresholds as a starting point for all new applications that are</p>	<p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council's betting shop policy provides a good example of a 'model policy' that is appropriate and compliant with the aspirations of both regions and local</p>	<p>The Council considers that policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, in particular, town centre vitality and viability.</p> <p>The Council has reviewed Greenwich Council's betting shop policy and considered it ineffective in not providing any certainty as to how the policy may be applied.</p> <p>No change</p>

				<p>not based on a robust and credible evidence base is wholly unsubstantiated and does not allow officers/members to make objective decisions.</p> <p>Indeed, many of the centres will have exceeded the thresholds outlined in the policy already, many of the extant planning permissions will not be implemented, and if the decision-makers are told that there is already an issue with betting shop use within the borough, many will naturally conclude that an additional betting shop in an area would result in an area being at high risk of adverse impacts and there will be a tendency to conclude that the application should be refused. This is clearly unacceptable, particularly given that there is not specific robust and credible evidence to back up the document's presumptions in this regard.</p> <p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council's betting shop policy provides a good example of a 'model policy' that is appropriate and compliant with the aspirations of both regions and local policy. The policy states: "When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this particular type of use".</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On</p>	<p>policy. The policy states:</p> <p>"When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this particular type of use".</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the</p>	
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					<p>adoption of the model policy, we would then consider the Plan ‘sound’.</p> <p>We would be grateful if you would take the above comments on board in the preparation of the Plan and request that you keep us informed on further progress and dates for the Examination in Public.</p>	<p>current text. On adoption of the model policy, we would then consider the Plan ‘sound’.</p>	
42	RDM149	DM43	Not stated	Not stated	<p>DM42 and 43 are already restrictive in their nature and to attempt to impose a 5% cap on the numbers of betting shops in addition to these other proposed restrictions is we believe unlawful and would be susceptible to judicial review on the grounds of unreasonableness. Such restrictions set an unwelcome precedent and William Hill would be minded to challenge as it prejudices the commercial well being of a business that has its headquarters in the Borough. William Hill employs some 250 people in Haringey and the authority should not be introducing a policy which prejudices local jobs (Administration offices and betting shops)</p> <p>Planning evidence held by William Hill (see below) supports the view that betting shops drive considerable footfall and, in attempting to bring forward such a policy, a conflict is created with the Gambling Act 2005. The Authority is under a general duty to aim to permit gambling.</p> <p>Whilst planning and licensing law fall to be considered separately, this proposal clearly creates a conflict of laws. Gambling law specifically deals with issues relating to protecting children and the vulnerable so if this policy is related to the vibrancy and vitality of the high street, then the authority is duty bound to bring forward evidence that (a) there</p>		<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy</p>

				<p>is an “over concentration” and (b) that such concentrations would damage the vibrancy and vitality of town or local centres. The plan produces no such evidence and if the authority proposes such restrictions then the onus is on it to provide the substantial evidence required to introduce a policy that is prima facie an interference with legitimate trade.</p> <p>A previous enquiry into betting shops in the Borough did not find any particular evidence of betting shops creating substantial social harm. Problem gambling levels in the UK are low by international standards (0.4%) and probably falling. The Authority have also failed to consider the negative outcomes of an overly restrictive policy in terms of creating a risk that this restriction may cause unmet demand for gambling and a risk of migration to an illegal market.</p> <p>A restrictive policy is also at odds with competition law as it introduces market restriction which has a direct impact on new market entrants.</p>		<p>SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and</p>
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							<p>found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to</p>
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							individual site circumstances.
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Policy DM44 Neighbourhood Parades and Other Non-Designated Frontages

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
10	RDM40	DM 44	Not Stated	Not Stated	<p>No equivalent policy at first consultation stage. Map required</p> <p>'a window display or other appropriate town centre frontage'</p> <p>Ye Olde Sweete Shoppe in Quernmore Road N4 has received much local opprobrium and mockery. It is doubtful that BRE Daylight and Sunlight standards have been reached in the dwelling which has replaced the shop. The Design Quality and Quality of Life (Jan 2015 DM2) of the dwelling is compromised. However it is noted that Quernmore Road is shown as a Local Shopping Centre on the Policy Map. We assume non-retail uses would not include conversion of shops to residential within a</p>	Not stated specifically.	<p>This policy was part C of DM53 in the Preferred Options version. The policy was amended in response to Reg 18 consultation comments and was separated to ensure clarity for policy implementation, and renamed in terms of the Town Centres hierarchy.</p> <p>Mapping neighbourhood parades and other non designated frontages is too detailed for a borough wide plan. This may be more appropriate at a Neighbourhood Plan level.</p> <p>Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation. Proposals in neighbourhood parades and other non designated frontages will be expected to meet the requirements set out in DM44 as well as other relevant policies. Conversion of town centre uses to residential will not be permitted on designated frontages.</p>

					Conservation Area or elsewhere		No change.
11	RDM58	DM 44	Not Stated	Not Stated	No equivalent policy at first consultation stage. Map required	Not stated specifically.	<p>This policy was part C of DM53 in the Preferred Options version. The policy was amended in response to Reg 18 consultation comments and was separated to ensure clarity for policy implementation, and renamed in terms of the Town Centres hierarchy.</p> <p>Mapping neighbourhood parades and other non designated frontages is too detailed for a borough wide plan. This may be more appropriate at a Neighbourhood Plan level.</p> <p>No change</p>
11	RDM59	DM 44 A	Not Stated	Not Stated	<p>'a window display or other appropriate town centre frontage'</p> <p>Ye Olde Sweete Shoppe in Quernmore Road N4 has received much local opprobrium and mockery. It is doubtful that BRE Daylight and Sunlight standards have been reached in the dwelling which has replaced the shop. The Design Quality and Quality of Life (Jan 2015 DM2) of the dwelling is compromised. We assume non-retail uses would not include conversion of shops to residential in a</p>	Not stated specifically.	<p>Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>Proposals in neighbourhood parades and other non designated frontages will be expected to meet the requirements set out in DM44 as well as other relevant policies. Conversion of town centre uses to residential will not be permitted on designated frontages.</p> <p>No change.</p>

					Conservation Area		
11	RDM58	DM 44	Not Stated	Not Stated	No equivalent policy at first consultation stage. Map required	Not stated specifically.	<p>This policy was part C of DM53 in the Preferred Options version. The policy was amended in response to Reg 18 consultation comments and was separated to ensure clarity for policy implementation, and renamed in terms of the Town Centres hierarchy.</p> <p>Mapping neighbourhood parades and other non designated frontages is too detailed for a borough wide plan. This may be more appropriate at a Neighbourhood Plan level.</p> <p>No change</p>
11	RDM59	DM 44 A	Not Stated	Not Stated	<p>'a window display or other appropriate town centre frontage'</p> <p>Ye Olde Sweete Shoppe in Quernmore Road N4 has received much local opprobrium and mockery. It is doubtful that BRE Daylight and Sunlight standards have been reached in the dwelling which has replaced the shop. The Design Quality and Quality of Life (Jan 2015 DM2) of the dwelling is compromised. We assume non-retail uses would not include conversion of shops to residential in a Conservation Area</p>	Not stated specifically.	<p>Previous decisions on proposals made under current adopted policy are outside the scope of this Local Plan consultation.</p> <p>Proposals in neighbourhood parades and other non designated frontages will be expected to meet the requirements set out in DM44 as well as other relevant policies. Conversion of town centre uses to residential will not be permitted on designated frontages.</p> <p>No change.</p>

Policy DM45 Maximising the Use of Town Centre Land and Floorspace

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
53	RDM173	DM 45	Not stated	Not stated	We would strongly suggest that this policy should seek to optimise land in town centres as oppose to maximise. By optimising you are recognising that there are other factors to consider which will influence the degree and form of the change being encouraged. In particular the capacity of heritage assets to accommodate change without causing harm to their significance. This is a challenge which is likely to occur in the Borough's town centres, where there is a greater likelihood of heritage assets being present. This balanced approach reflects the NPPF's principles of delivering sustainable development.	Policy should require land use to be optimised rather than maximised	Agreed. Change Policy DM 45 title to read: <u>Maximising</u> <u>Optimising</u> the Use of Town Centre Land and Floorspace Change Policy DM 45.A to read: The Council will seek to maximise <u>optimise</u> the use of land...

Policy DM46 Betting Shops

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
41	RDM138	DM 46	No	Yes	In our view policy DM46 is not Sound as the policy is not 'justified' as it is 'not using the most	The policy should be re-worded, or as a minimum, significantly	The Council has reviewed Greenwich Council's betting shop policy and considered it

				<p>appropriate strategy’ when considered to the alternatives in the Retail Study. In addition, it is not ‘effective’ as it is not ‘flexible’ and it is not ‘consistent with National Policy’. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.</p> <p>The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with the guidance set out in the London Plan Town Centres SPG.</p> <p>The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>loosened to allow healthy competition between shops. Greenwich Council’s betting shop policy provides a good example of a ‘model policy’ that is appropriate and compliant with the aspirations of both regions and local policy. The policy states:</p> <p>“When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and the need to avoid over-concentration and saturation of this particular type of use”.</p> <p>We suggest that Haringey consider the points raised within our representation letter and adopt the</p>	<p>ineffective in not providing any certainty as to how the policy may be applied.</p> <p>No change</p>
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						model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan ‘sound’ .	
41	RDM140	Para 6.54 – 6.57 DM 46			<p>In our view paragraphs 6.54 – 6.57 are not Sound as they are not ‘justified’ as they are ‘not based on a robust and credible evidence base’ in the form of the Health Evidence Base. In addition, it is not ‘consistent with National Policy’ (NPPF) or with the London Plan and Town Centres SPG.</p> <p>The onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG.</p> <p>The text therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p>	<p>Reference to the Health Evidence Base should be removed from the supporting text to Policy DM46 as it does not form a credible evidence base. The Health Evidence Base document relates to problem gambling which is a matter already dealt with under the Licensing Act, and contrary to the Council’s statements, the study suggests that there is not enough empirical evidence to support the thresholds that have been formulated for betting shops on the grounds of health concerns.</p> <p>We suggest that Haringey consider the</p>	<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8</p>

					<p>points raised within our representation letter and remove reference to the Health Evidence Base document.</p>	<p>which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42, 43 and 46 set out the most appropriate and</p>
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							robust approach to ensure the positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.
41	RDM143	DM 46	No	Yes	<p>Part A of the policy states that proposals for betting shops should have regard to Policies DM42 and DM43. We have already provided our comments on these policies above and how we consider these policies unsound.</p> <p>Part B of the policy states that the total number of betting shops (including extant planning permissions) will not exceed 5% of the units within the town or local centre. Within the supporting text for the policy, it is noted that the policy seeks to manage a proliferation or over-concentration of betting shops. It is also noted that the ‘Health Evidence Base’ document (2012) highlights the link between “health outcomes and the proximity of betting shops”. It concludes that there is sufficient evidence to demonstrate that “access to gambling venues, including betting shops, leads to increased gambling behaviour and that, this in turn, is associated with poor health outcome”. The</p>	Not specifically stated	<p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local</p>

				<p>supporting text then discusses the vitality and viability of the centres in the borough.</p> <p>It should be noted that Health and Vitality and Viability are completely separate issues. The NPPF recognises the role of the planning system in supporting the vitality of town centres and promoting healthy communities. Paragraph 23 of the NPPF is clear when it states that LPAs should recognise town centres as the heart of their communities and pursue policies to support their viability and vitality. In this regard, LPAs should set out policies that make clear which uses will be permitted in such locations, and promote competitive town centres that provide a diverse retail offer which reflects the individuality of a town centre. However, it is considered that the Council are not pursuing policies that will support the vitality and viability of their centres as the stringent threshold policies they are proposing could discourage new operators and new uses out of centres not promoting competitive town centre environments</p>	<p>policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The Council considers the policies 42 and 43 set out the most appropriate and robust approach to ensure the</p>
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							positive management of town centres, whilst providing flexibility to consider proposals having regard to individual site circumstances.
41	RDM144	DM 46	No	Not stated	<p>We consider that in line with the London Plan and Town Centres SPG (2014) the starting point for Plan policy making is whether there is an existing over concentration or cluster of uses (including betting shops) which has reached saturation levels where positive impacts are outweighed by negative impacts.</p> <p>As noted, the Council's Retail and Town Centres Study (2013) (prepared by NLP) which is part of their evidence base clearly states that the analysis undertaken:</p> <p>Does not suggest that there is any significant clustering of specific uses, such as betting shops, within the town centres" (para 15.30).</p> <p>The study states that quite rightly, there are a higher number of these types of uses within the larger centres (such as Wood Green) but this reflects the centre's Metropolitan centre designation and the proportion of units in these uses still remains small. In addition, in regards to the local centres the</p>	Not specifically stated	<p>The Council considers that the policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that "over-concentrations of betting shops and hot food takeaways can give rise to particular concerns", which is supported by local technical evidence.</p> <p>The threshold of 5% needs to be seen in the context of non-retail provision within Town Centres in accordance with DM42 & DM43 and therefore would represent a significantly high portion of non-town centre uses, which the Council would class as an over concentration of a single type of use, harmful to the vitality of the town centre and giving rise to unacceptable health outcomes for local residents. If as suggested, there are not clusters of betting shops within</p>

				<p>study suggests that:</p> <p>“The analysis has not identified any clustering” (paragraph 15.31)</p> <p>It is important to note that Haringey has 66 betting shops in the borough which is a far lower figure than many other London boroughs. It is even highlighted within the study that the majority of local centres have just 1 betting shop (only 2 centres have above 2 but these are larger local centres) and 8 local centres (of 38) had no betting shops at all at the time the study was published.</p> <p>From the evidence base information available it is impossible to establish whether saturation levels have been reached resulting in harm to the centres when assessed in line with the 8 criteria of London Plan policy 4.8. However, one would assume that based on the comments made in the Retail Study, that there is no concern over a cluster of these uses within the centres or concern that saturation levels have been reached. On this basis, it is unclear how the 5% threshold figure in the policy has been derived at. There is no indication in the evidence base</p>		<p>Harrows town centres then the threshold will not be breached and applications for new betting premises will be approved.</p> <p>No change</p>
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					<p>documents that this particular figure is appropriate and no explanation as to how, based on the evidence, the figure has been chosen. Indeed, the evidence base identifies no significant clusters of betting shop uses within the centres. As such, it is clear that there is no basis for the threshold figure.</p> <p>We consider that the document should provide further information on why the 5% threshold is appropriate. At present, in this regard, the policy is unsound as it is not 'justified' (it is not using the most appropriate strategy when taking into account the conclusions of the Retail Study), it is not 'effective' as it is not flexible nor is it 'consistent with national policy'.</p>		
41	RDM145	DM 46	No	Not stated	<p>As noted the supporting text of the Plan (paragraph 6.55) notes that the Council's 'Health Evidence Base' document (2012) highlights the link between health outcomes and the proximity of betting shops'. It concludes that there is sufficient evidence to demonstrate that access to gambling venues, including betting shops, leads to increased gambling behaviour and that, this in turn, is associated with poor health outcomes". The document then states that the</p>	<p>It is considered therefore that reference to the Health Evidence Base should be removed from the supporting text to Policy DM46 as it is not 'justified' or based on a credible evidence base.</p>	<p>The Council considers that the policy approach is in conformity with national and regional policy and was assessed against alternatives.</p> <p>The Sustainability Assessment appraised the options to managing negative clusters (specifically hot food take aways and betting shops) in town centres and found that the preferred option is a policy which seeks to proactively</p>

				<p>Council is committed to improving the health and well-being of its residents along with visitors of the borough and in light of the above evidence, it is considered appropriate for the Local Plan to seek to manage betting shops (by applying the 5% threshold policy).</p> <p>However, within the evidence base document it is clearly stated that:</p> <p>“Although many of these situational characteristics (e.g. concentration, clustering or proximity of venues) are thought to influence vulnerable gamblers, there has been very definitive conclusions can be made. The scientific literature therefore falls short of supporting particular densities or exclusion/saturation distances for betting shops in the area” (paragraph 6.2.54).</p> <p>This suggests that contrary to the Council’s statements, there is not enough empirical evidence to support particular thresholds being formulated for betting shops on the grounds of health.</p> <p>However, it should be emphasised that this document relates to problem gambling which is a matter already dealt with under the Licensing Act and a matter that</p>		<p>manage negative clusters of betting shops and hot food takeaways. This approach will help to deliver the objectives of the Strategic Policies, particularly around improving the health of local residents and addressing deprivation. The preferred option is supported by the SA, which reflects the positive effects across a range of sustainability objectives.</p> <p>The threshold of 5% needs to be seen in the context of non-retail provision within Town Centres in accordance with DM42 & DM43 and therefore would represent a significantly high portion of non-town centre uses, which the Council would class as an over concentration of a single type of use, harmful to the vitality of the town centre. Therefore beyond ensuring the health outcomes of local residents is looked after, the threshold is also appropriate for maintaining the vitality of Haringey’s town centres.</p> <p>No change</p>
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				<p>cannot really be dealt with under the Planning system. It is important to note that gambling is one of the most heavily regulated activities in the country which has resulted in a socially responsible industry.</p> <p>Betting shops are governed by the three gambling objectives. Betting shop operators wishing to open a new betting shop must demonstrate that their operation will:</p> <ol style="list-style-type: none"> 1. prevent gambling from being a source of crime and disorder, being associated with crime or disorder, or being used to support crime; 2. ensure that gambling is conducted in a fair and open way; <p>and</p> <ol style="list-style-type: none"> 3. protect children and other vulnerable people from being harmed or exploited by gambling. <p>As such, when applying for their gaming licence, betting shop operators must provide information and evidence demonstrating that they have appropriate training and management procedures/policies in place to show that they will comply with these objectives, including the protection of children and other vulnerable people, something that betting shop operators take very seriously. This of course includes</p>		
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				<p>being members of various schemes. For example, Paddy Power was a founding member of the Senet Group, an independent body set up to promote responsible gambling standards. They are also certified by Gamcare, as are the majority of the major betting shop operators.</p> <p>Failure to demonstrate compliance with the objectives means that a licence will not be granted, and of course, if at any time a betting shop operator is found not to be complying with the objectives in the future, their licence can be reviewed and ultimately revoked. Where the licensing authority has any concerns about a new operation when considering a licence application, they are perfectly entitled to impose conditions on a licence to ensure that additional measures/policies/procedures are put in place.</p> <p>Taking this into consideration and in summary, we do not believe that the Council should be using problem gambling as a means to policy formulation when this matter is dealt with under the Licensing Act, nor is there any justification for a 5% threshold figure.</p>		
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					It is considered therefore that reference to the Health Evidence Base should be removed from the supporting text to Policy DM46 as it is not 'justified' or based on a credible evidence base.		
41	RDM146	DM 42 DM 43 DM 46	No	Not stated	<p>Summary and conclusions</p> <p>In our view policies DM42, DM43 and DM46 and supporting text paragraphs 6.54 – 6.57 are not 'justified', 'positively prepared' or 'consistent with national policy'. The policy and reasons are not founded on a robust and credible evidence base. Furthermore, the policy and supporting text is not consistent with national policy nor with the London Plan. The overly onerous approach taken by the Council in relation to betting shops is not compliant with the spirit and aspirations of the NPPF or with guidance set out in the London Plan Town Centres SPG. The policy therefore amounts to a conflict with Section 19 of the Planning and Compulsory Purchase Act 2004 and also conflicts with Part 4 Regulation 8 of the 2012 Town and Country Planning (Local Planning) (England) Regulations.</p> <p>We have no issue with the fact that the Council will want to scrutinise</p>	<p>We conclude that the policy should be re-worded, or as a minimum, significantly loosened to allow healthy competition between betting shops. Greenwich Council's betting shop policy provides a good example of a 'model policy' that is appropriate and compliant with the aspirations of both regions and local policy. The policy states:</p> <p>"When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid</p>	<p>The Council considers that policies 42, 43 and 46 set out the most appropriate and robust approach to ensure the positive management of town centres, in particular, town centre vitality and viability.</p> <p>The Council has reviewed Greenwich Council's betting shop policy and considered it ineffective in not providing any certainty as to how the policy may be applied.</p> <p>No change</p>

				<p>new betting shop applications and ensure that they will not lead to any clusters or concentrations which would lead to negative impacts, however, to assert unnecessary thresholds as a starting point for all new applications that are not based on a robust and credible evidence base is wholly unsubstantiated and does not allow officers/members to make objective decisions.</p> <p>Indeed, many of the centres will have exceeded the thresholds outlined in the policy already, many of the extant planning permissions will not be implemented, and if the decision-makers are told that there is already an issue with betting shop use within the borough, many will naturally conclude that an additional betting shop in an area would result in an area being at high risk of adverse impacts and there will be a tendency to conclude that the application should be refused. This is clearly unacceptable, particularly given that there is not specific robust and credible evidence to back up the document's presumptions in this regard.</p> <p>We conclude that the policy should be re-worded, or as a minimum,</p>	<p>over-concentration and saturation of this particular type of use".</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan 'sound'.</p>	
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					<p>significantly loosened to allow healthy competition between betting shops. Greenwich Council's betting shop policy provides a good example of a 'model policy' that is appropriate and compliant with the aspirations of both regions and local policy. The policy states: "When determining applications for new betting shops within protected retail frontages, consideration will be given to the number of existing betting shops in the centre and need to avoid over-concentration and saturation of this particular type of use".</p> <p>We suggest that Haringey consider the points raised within this representation and adopt the model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan 'sound'.</p> <p>We would be grateful if you would take the above comments on board in the preparation of the Plan and request that you keep us informed on further progress and dates for the Examination in Public.</p>		
42	RDM147	DM46	Not stated	Not stated	We object to the proposed policy under DM46 which is said to relate to local concerns about the "over concentration" of betting shops.		Objection noted.

					“Over concentration” is undefined and the policy does not appear to be based on any clear empirical evidence relating to either vibrancy, vitality or evidence of any negative impact on public health. The proposed policy is neither necessary, proportionate or objectively justifiable and there is no reference to supporting evidence.		
51	RDM167	DM46, DM47	Not Stated	Not Stated	Town centres and Retail The Mayor supports Haringey’s aim to ensure vibrant high streets by managing the overconcentration of betting shops. He also supports the approach to limiting hot food take-away in order to address public health issues.		The Council welcomes support for the proposed policies.

Policy DM47 Hot Food Takeaways

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council’s Comments / Response
43	RDM150	DM47	No	No	Compliance We consider that no regard has been given to national policy and advice in preparing Policy DM47 because no National Planning Policy Framework (NPPF) policies deal with dietary issues. This means that the draft DM DPD does not comply with sub-section 19 (2) (a) of The Planning and Compulsory Purchase Act 2004 (PCPA04). Specifically, taking into account the proximity of hot food takeaways to schools or indeed any other type of facility has no basis in national policy and national practice guidance simply refers to a briefing paper	The deletion of Policy DM47 Part (A) entirely, and, from Part (B), the	The Council considers that the policy approach is consistent with national policy in addressing health and well-being. Of the three core dimensions of

				<p>containing case studies on the issue. Indeed, restricting accessibility to services is directly contrary to national policy. We consider that no regard has been given to national policy and advice in preparing Policy DM47 because the draft DM DPD would furthermore be rendered unsound in terms of the criteria set out at NPPF paragraph 182. This also means that the draft DM DPD does not comply with sub-section 19 (2) (a) of PCPA04. We do not consider a reasoned justification for the draft policy has been substantially provided in accordance with regulation 8 (2) of The Town and Country Planning (Local Planning) (England) Regulations 2012. Neither the text at paragraphs 6.58 – 6.62 nor the evidence base support zonal restrictions on food and drink uses. Positively Prepared The draft policy is not based on any objectively assessed development requirement. It effectively assesses the requirement for hot food takeaways within 400 metres of the boundary of a primary or secondary school as zero, but does so without evidence of either a link between the incidence of childhood obesity and the proximity of hot food takeaways to schools or of any particular distance at which that link is demonstrated. Consequently, the development requirement has not been objectively assessed. In fact, the distance chosen has the effect of banning hot food takeaways from a large majority of the Borough. Because no assessment has been made of the number of hot food takeaways that might be refused as a result of this or what the social, economic or environmental impacts of that might be, it is not possible to balance these impacts. The policy is negative in its assumptions, using the concept of ‘unhealthy food’, which is at best unhelpful in isolation from an understanding of the person eating the food, their health and lifestyle, and at worst is simply subjective. Furthermore, it assumes all hot food takeaways offer little choice and serve the same type and standard of food. Justified The only evidence referred to specific to the draft policy appears to be a Government Office for Science Report from 2007 that simply observes that diet is a key determinant of obesity levels. It</p>	<p>text “Subject to (A) above” and “only” and the criteria (b) and (c). Specific percentage</p>	<p>planning set out in the NPPF, health is included in the “social role” of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities. Haringey’s technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the</p>
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				<p>does not make a spatial link between the incidence of obesity and the proximity of hot food takeaways to schools or indeed any other locations. Whilst supporting text to Policy 3.2 of the London Plan at paragraph 3.11 suggests that planning policies established as contributing to health “...can be complemented by other measures, such as local policies to address concerns over the development of fast food outlets close to schools”, this does not itself represent evidence. Indeed, it aspires only to tackle “concerns” and omits a definition of what “close” might mean because no adverse effects of the proximity of hot food takeaways to schools have been established. To that extent, the London Plan simply passes responsibility on to Boroughs to justify any such policies they may seek to promote. There is no objective evidence for any link between the incidence of obesity and the proximity of hot food takeaways to schools, so it is at best unclear whether refusing planning applications for hot food takeaways on the basis suggested could ever have an effect on the incidence of obesity, childhood or adult, near schools or elsewhere. The inclusion of primary schools is particularly problematic, as it is clear that children at primary schools are not usually permitted to leave the premises at lunchtime and, given their age, are unlikely to travel to or from school unaccompanied. Outside school time, children’s diets are quite properly the responsibility their parents or guardians. Consequently, it is far from clear how refusing planning permission for hot food take-aways “close to” primary schools could ever be justified. This was the view taken by a Planning Inspector in an appeal (APP/P4415/A/11/2159082) against refusal of a restaurant and hot food takeaway in January 2012. A further difficulty of using simple distance radii as shown in Figure 6.1 is that it takes no account of real barriers, either physical or perceptual, so that premises on the other side of a line feature such as a canal or busy road could be affected despite in reality being more than a 400m walk away. Diet is clearly a key determinant both of general health and obesity levels. Exercise is the other key</p>	<p>policy approach is also in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Council considers the approach is the most appropriate when considered against alternatives, having been considered through the Sustainability Appraisal</p>
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					<p>determinant which must be considered for a complete picture. Focussing on improving access to open space, sport and recreation facilities would be a far more appropriate strategy for reducing childhood obesity. Whilst no evidence is presented to support any public health effects of concentrations of food and drink uses referred to in draft Policy DM47 (B), we consider high concentrations of any one type of use are unhealthy in retail health terms, and that this may sometimes also be the case in terms of human health. Effective For the reasons set out above in respect of the lack of justification for the policy, it is unclear how refusing permission for hot food takeaways within 400 metres of primary schools could ever be effective. Some hot food takeaways, together with restaurants, pubs and shops are clearly a source of cheap, energy dense and nutrient poor foods; however, not all hot food takeaways, restaurants, pubs and shops are, and the planning system is ineffective in distinguishing between those that are and those that are not. The area that would be affected by the policy covers most of the Borough, so it is hard to see how the effectiveness of its extent could be monitored. Would poor or negative achievement against the objective result in reduction or expansion of the zones? What other corrective action might be taken short of its withdrawal? Consistent with National Policy We consider that no regard has been had to national policy and advice in preparing Policy DM47 because none of the NPPF policies include dietary issues. The NPPF recognises the role planning takes in better enabling people to live healthier lifestyles. However, it seeks to do this by creating, not restricting choice, by increasing access to recreation and health services, and by ensuring developments are walkable. National practice guidance simply refers to a briefing paper containing case studies.</p>		<p>process, and is supported by up-to-date technical evidence.</p> <p>Change: At paragraph 6.59 amend for sentence to read: “The Public Health Directorate has published a health evidence base, <u>which, along with Hot Food Takeaway Shops: An Evidence Base Study (2015) to has informed</u> preparation of Haringey’s Local Plan.</p>
44	RDM1 51	DM47	Not Stated	Not Stated	<p>This response relates to Policy DM47 and the supporting text of the above consultation document.</p> <p>We have considered Policy DM47 with regard to the principles</p>	Not stated.	Obesity and, in particular, child obesity, is a significant health

				<p>set out within the Framework. Local Plans should “plan” positively for development; be justified; effective; and consistent with the Framework.</p> <p>The policy restricts proposals for hot food takeaway shops located within 400 metres of the boundaries of a primary or secondary school. Additionally the policy restricts the percentage of hot food takeaway shops will not exceed 5% of designated shopping frontage in Metropolitan and District Town Centres. Furthermore, the policy restricts the concentration of hot food takeaways in the Borough.</p> <p>We consider that limiting the location, number and location of hot food takeaways would be unsound. By way of overview, the Framework provides no justification at all for using the development control system to seek to influence people's dietary choices.</p> <p>There is no adequate evidence to justify the underlying assumption, that locating any Hot Food Takeaway within certain distances of schools causes adverse health consequences, which would in turn have negative land use planning consequences. The evidence does not support this chain of reasoning or a restriction on the location and concentration of Hot Food Takeaways.</p> <p>We consider that a 5% threshold is unjustified. To limit Hot Food Takeaway units to 5% of any designated shopping frontage would be too restrictive.</p> <p>2. Such an approach is not positive, justified, effective or consistent with the Framework.</p> <p>Restricting the quantity, concentration and location of Hot Food Takeaway proposals within the borough, is not a positive</p>		<p>issue facing the country and also Haringey. As shown in the recent Joint Strategic Needs Assessment, Haringey has a high proportion of obese children when benchmarked against London and national averages. The prevalence of obesity disproportionately affects those from lower socioeconomic backgrounds, with children living in the east of the borough particularly affected. The NHS is trying to tackle this significant issue using all means possible, including the planning system, through the</p>
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				<p>approach to planning. The Framework “foreword” sustainable development is about positive growth, making economic, environmental and social progress for this and future generations.</p> <p>The suggested restriction, takes an ambiguous view of Hot Food Takeaway uses in relation to the proximity to primary and secondary schools. It would apply an over-generic approach to restrict development with little sound planning reasoning or planning justification. This is contrary to Para 14 of the Framework which advises authorities to positively seek opportunities to meet development needs of their area.</p> <p>Thus is inconsistent with Para 19 and 21 of the Framework. Para 19 states: <i>Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system.</i></p> <p>2.4 Para 21 states: <i>Investment in business should not be over-burdened by the combined requirements of planning policy expectations.</i></p> <p>Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>There is a lack of evidence to demonstrate the link between fast food, school proximity and obesity. We confirm this at Appendix A.</p> <p>A systematic review of the existing evidence base by Oxford University (December 2013), funded by the NHS and the British Heart Foundation ‘<i>did not find strong evidence at this time to justify policies related to regulating the food environments around schools.</i>’ It instead highlighted the need to ‘<i>develop a higher</i></p>		<p>promotion of more active lifestyles (walking, cycling networks, quiet ways, cycle facilities at work – showers & lockers – open space provision, retention of playing fields, inclusive design, recreation facilities etc) and through prevention (restrictions on uses that contribute to poor health outcomes).</p> <p>The Council considers that the policy approach is consistent with national policy in addressing health and well-being of local residents, particularly those most vulnerable – our children.</p> <p>Of the three core dimensions of</p>
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				<p><i>quality evidence base</i>'.¹</p> <p>This lack of evidence has been confirmed in a number of planning decisions. For example, in South Ribble the Planning Inspectorate raised concerns about a similar 400m school proximity restriction on fast food, stating <i>'the evidence base does not adequately justify the need for such a policy'</i>, and due to the lack of information, it is impossible to <i>'assess their likely impact on the town, district or local centres'</i>.²</p> <p>The evidence provided at Appendix B confirms that 70% of purchases by students in the school fringe are purchased in non A5 shops.³</p> <p>No consideration has been given to other A class uses and their contribution or impact on daily diet or wellbeing. The suggest approach is therefore not holistic and will not achieve the principle aim.</p> <p>There is lack of evidence to demonstrate that purchases in fast food outlets are any more or less healthy than purchases in other A Class premises. Evidence confirming this is set out in Appendix C.</p> <p>Research by Peter Dolton states that <i>"At least 50% of the days in a year kids don't go to school if we count weekends and holidays and absence. They are only there for 6 hours and all but 1 are lessons. So only around 2-3% of the time can [children] get fast food at school."</i>⁴ This clarifies that a blanket restriction on opening hours is unjustified.</p> <p>Similarly, research by Brighton & Hove concluded that <i>'the greatest influence over whether students choose to access unhealthy food is the policy of the individual schools regarding</i></p>	<p>planning set out in the NPPF, health is included in the "social role" of planning. Further, Section 8 of the NPPF is devoted to promoting healthy communities.</p> <p>Haringey's technical evidence base has identified key health issues which the policy seeks to address, having regard to the NPPF. The policy is also considered to be in line with NPPF paragraph 23, and gives effect to Policy SP 10, which sets out the strategic approach to supporting town centre vitality by ensuring a diversity of uses.</p> <p>The Council considers that the</p>
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				<p><i>allowing students to leave school premises during the day</i>'.5</p> <p>Only limited purchases of food are made at A5 uses on journeys to and from school. Further details are set out in Appendix D.</p> <p>1 J Williams, P Scarborough, A Matthews, G Cowburn, C Foster, N Roberts and M Rayner, Nuffield Department of Population Health, University of Oxford, page 13, 11th December 2013. <i>A systematic review of the influence of the retail food environment around schools on obesity-related outcomes</i>.</p> <p>2 Letter to South Ribble Borough Council, 29th April 2013, from Susan Heywood, Senior Housing & Planning Inspector, The Planning Inspectorate</p> <p>3 <i>The School Fringe: What Pupils Buy and Eat From Shops Surrounding Secondary Schools</i>, July 2008, Sarah Sinclair and Professor J T Winkler, Nutrition Policy Unit of London Metropolitan University</p> <p>4 Peter Dolton, Royal Holloway College, University of London & Centre for Economic Performance, London School of Economics, <i>Childhood Obesity in the UK: Is Fast Food a Factor?</i> http://www.made.org.uk/images/uploads/2_Prof_P_Dolton_presentation.ppt</p> <p>5 Brighton & Hove City Council & NHS Sussex, <i>Hot-food takeaways near schools: An impact study on takeaways near secondary schools in Brighton and Hove</i>, page 30, September 2011 Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>Given the limited access that children have to fast food during the school day, a generic restriction is disproportionate; is not justified; and would not be effective.</p> <p>Such an approach would have a disproportionate effect on land use planning and the economy when taking into account the</p>	<p>policy approach is in conformity with the London Plan, including Policy 4.8 which provides scope for local policies to manage clusters of uses, and Paragraph 4.50A which states that “over-concentrations of betting shops and hot food takeaways can give rise to particular concerns”, which is supported by local technical evidence.</p> <p>The Council considers the approach is the most appropriate when considered against alternatives, having been considered through the Sustainability Appraisal</p>
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				<p>limited purchases made by school children who may only have the potential to visit Hot Food Takeaway establishments at the end of the school day, and only during term time.</p> <p>The proposed 5% restriction on Hot Food Takeaway uses is considered unsound. No consideration is given to other A class uses. The policy directly conflicts with national guidance, and would provide an overly restrictive limitation on prospective development. The percentage threshold is too low.</p> <p>Not all Hot Food Takeaway uses contribute to unattractive shopping frontages. Takeaway units can provide active frontages within the streetscene throughout the day.</p> <p>The Framework cannot be interpreted to provide generic restrictions on a particular use class. Moreover, the evidence does not support such restrictions. The need for evidence is emphasised in para 158 of the Framework which states that each local plan should be based on adequate, up-to-date and relevant evidence. Compliance with the soundness test is still required.</p> <p>The proposal does not accord with the “golden thread” running through the Framework which seeks to build a strong competitive economy. Such a policy could potentially stifle economic development and is not consistent with the Framework.</p> <p>3. Soundness - summary</p> <p>We consider that restricting the quantity, concentration and location of hot food takeaways would be unsound and fails to meet the four tests of the Framework. It is not a positive approach to planning; justified; effective; or consistent with national planning policy. Such a policy should therefore not be taken forward to the next stage of the plan making process.</p>	<p>process, and is supported by up-to-date technical evidence.</p> <p>Change: At paragraph 6.59 amend for sentence to read: “The Public Health Directorate has published a health evidence base, <u>which, along with Hot Food Takeaway Shops: An Evidence Base Study (2015) to has informed</u> preparation of Haringey’s Local Plan.</p>
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				<p>Many restaurant operators have made major steps to expand the range of healthy options and work with the communities within which they are / will be part of.</p> <p>4. McDonald's has made major steps in recent years to expand the range of healthy offerings</p> <p>As a responsible business, McDonald's recognises it has a role to play to support its staff, customers, and the communities in which it operates to live healthier lifestyles. For this reason, McDonald's has invested significantly to evolve its menu over the last 10 years – both to extend the range of choice, and to reformulate our products. For example, McDonald's has:</p> <p>Added porridge, salads, grilled chicken wraps, carrot sticks, fruit bags, orange juice, mineral water, and organic milk to its menu</p> <p>Completely removed hydrogenated trans-fats from its menu</p> <p>Reduced salt in our Chicken McNuggets by 36%, and our fries by a quarter since 2003</p> <p>Reduced fat in its milkshakes by 34% per serving since 2010</p> <p>Reduced fat in its deli rolls by 42% since 2011 Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>McDonald's has also led the way displaying nutritional information to help its customers make informed choices. Since 2011, McDonald's has provided calorie information on every one of its 1,200+ menu boards in restaurants across the UK.</p> <p>This is in addition to the nutritional information that is already</p>		
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				<p>available on its website, on its tray liners, on its packaging, and via McDonald's mobile phone app. In 2012 alone, McDonald's received 2.2 million visits to its nutrition web page.</p> <p>Furthermore, McDonald's is committed to responsible advertising, and advertise to children only food items that are not classified by the Government's nutrient scoring criteria as High in Fat, Salt or Sugar "non-HFSS". All of McDonald's advertising to children features at least one portion of fruit or vegetables, and a no added sugar beverage such as milk.</p> <p>As a significant customer of British farming, McDonald's buys quality ingredients from 17,500 UK and Irish farmers. It now spends more than £390 million every year on British and Irish produce, compared to £269 million in 2009.</p> <p>All of McDonald's burgers are made with 100% British and Irish beef. We use whole cuts of forequarter and flank, with nothing added or taken away in the process.</p> <p>In addition, McDonald's only uses 100% British RSPCA Freedom Food Pork across its entire menu. As a result, all pork suppliers are required to meet strict animal welfare standards.</p> <p>McDonald's was also one of the first retailers to switch to using free range eggs – which it did back in 1998. Free range eggs are now used in its entire menu – including its sauces, muffins and the coating on chicken nuggets. Every year McDonald's use over 100 million free range eggs, sourced from more than 200 UK producers, and for its work in this area they have been awarded 'Food Business of the Year' by the British Free Range Egg Producers Association.</p> <p>The strength of McDonald's supply chain – which was clear of any horsemeat – has also been confirmed by Professor Chris</p>		
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				<p>Elliott, who said in light of the horsemeat scandal: <i>“McDonald’s invited us to look at farms and abattoirs – it was a very simple supply chain. The other thing I was very impressed about was the length of contract McDonald’s had with its suppliers.”</i>⁶</p> <p>6 Evidence at Environment, Food & Rural Affairs Select Committee Inquiry, January 2014</p> <p>5. McDonald’s also contributes to the community</p> <p>As the Community Partner of the Football Association, McDonald’s has helped to train and recruit more than 25,000 coaches. These coaches in turn have provided more than 2 million hours of free quality coaching, to one million young players.</p> <p>Over 1,000 McDonald’s restaurants across the UK are ‘twinned’ with a local team to provide free kit, equipment, advice and expertise.</p> <p>Each of McDonald’s restaurants also conduct a minimum of three litter patrols on a daily basis, and conduct larger Love Where You Live ‘clean up’ events. McDonald’s is also the primary sponsor of the Mayor of London’s Capital Clean Up campaign, to tackle litter across London. Haringey Local Plan Development Management DPD- Pre Submission Version January 2016</p> <p>Last year, McDonald’s restaurants in Greater London organised over 50 community clean-up events, with over 1,400 volunteers taking part.</p> <p>6. McDonald’s is a major employer of young people</p> <p>McDonald’s is a major employer of young people under the age of 25, and for many it provides a first step on the career ladder.</p>		
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					<p>McDonald's offers all staff the opportunity to gain qualifications which include Adult Certificates in English and Maths, a Level 2 Apprenticeship, and a Foundation Degree in Managing Business Operations.</p> <p>McDonald's invest £43 million annually in staff training and development</p> <p>7. There is a lack of evidence to demonstrate whether fast food is located by schools, or whether schools are located by town centres</p> <p>When McDonald's looks at the economic viability of a new site, it does not factor in predicted sales from school children or proximity to schools.</p> <p>Research by Christoph Buck has identified a similar approach with other retailers. His research suggests that <i>'food retailers are mainly located near major roads and in inner cities.'</i>⁷</p> <p>Indeed, <i>'food retailers are not clustered around schools for up to 1.5 km'</i>⁸ Correlations between schools and fast food density are therefore due to the proximity of both to town centres, where there is a broad mix of retail on offer.</p> <p>With a policy restricting location in place, all A5 development would likely be directed away from major, district and local centres – contrary to the sequential test.</p>		
51	RDM167	DM46, DM47	Not Stated	Not Stated	<p>Town centres and Retail</p> <p>The Mayor supports Haringey's aim to ensure vibrant high streets by managing the overconcentration of betting shops. He also supports the approach to limiting hot food take-away in order to address public health issues.</p>		The Council welcomes support for the proposed policies.

Policy DM48 Use of Planning Obligations

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RDM89	DM 48	Not Stated	Not Stated	<p>Whilst supporting paragraph 7.7 acknowledges that development viability may result in reduced financial contributions to allow a scheme to be delivered, this is not expressly provided for the draft policy. The viability of a development is key to its delivery. If the weight of financial burden is such that a developer will not secure competitive returns on a development that development will not come forward. NPPF paragraph 173 specifically states that developments 'should not be subject to such a scale of obligations and policy burdens that their ability to be delivered viably is threatened'. The policy should be reworded to make specific reference to development viability. Moreover, development viability may not allow for financial contributions to all items listed in the draft policy (including affordable housing, infrastructure and employment contributions). It should therefore be clarified that the Council will identify the priorities in respect of each site and should seek contributions accordingly.</p> <p>The Council has an adopted CIL Charging Schedule. It will be essential to ensure that policy DM48 works effectively with the local</p>	Not specifically stated	<p>The application of the Local Plan policies on development viability has been tested and the policies amended where necessary (e.g. through the reduction of the affordable housing target from 50% to 40%). Development is expected to meet the revised policy requirements, and therein, such obligations as necessary to make the development acceptable in planning terms. Without meeting the obligations the proposed development should be refused. Developers are therefore expected to take into account the costs of policy compliance, including infrastructure requirements & affordable housing, into account in their negotiation of land deals. Viability concerns should therefore be an exception, based on exceptional site circumstances, and where</p>

					CIL and that 'double charging' does not occur and an unreasonable financial burden is not placed on developments.		such is demonstrated, it remains for the planning authority to determine the balance of obligations to be secured, having regard to sustainability and site circumstances. The Regulation 123 list ensures 'double charging' does not occur. No change
53	RDM174	DM 48	Not stated	Not stated	As part of the Council's commitment and strategy for the historic environment in Haringey, we would strongly suggest that heritage assets are identified as a potential beneficiary from s106. This could include infrastructure structures and buildings that contain heritage interest or are covered by heritage designation.	Identify Heritage assets as potential beneficiary of s106	The use of planning obligations must, in every instance meet the legal tests – (a) necessary to make the development acceptable in planning terms; (b) directly related to the development; and (c) fairly and reasonably related in scale and kind to the development. It is difficult to see how heritage assets could be potential beneficiaries of s106 unless directly affected by a planning application and, then, necessary to make the development proposal acceptable. No change.

Policy DM49 Managing the Provision and Quality of Community Infrastructure

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
45	RDM152	DM 49	Not Stated	Not Stated	<p>NHS PS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHS PS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>NHS PS responded to Draft Policy DM58: Managing the Provision of Community Infrastructure as part of the “preferred options” consultation, February 2015. NHS PS has reviewed Policy DM49: Managing the Provision and Quality of Community Infrastructure of the Development Management DPD Pre-Submission Version. NHS PS notes the inclusion of Paragraph 7.17 within the supporting text of policy DM49. NHS PS welcomes this inclusion. The Policy now provides a greater degree of flexibility, and would allow the NHS to manage its estate more efficiently.</p> <p>NHS PS now considers Policy DM49 to be consistent with paragraph 3.87A of the 2015 London Plan (FALP).</p>	Not stated.	Noted.

Policy DM50 Public Houses

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
53	RDM175	DM 50	Not stated	Not stated	It should be noted that many public houses are of heritage interest and may be recognised as heritage assets. In these circumstances we would seek to ensure the	Not stated.	Paragraph 7.20 of the supporting text already states that public houses may be buildings of historic interest or

					test for redevelopment of changes of use will take into account the potential impacts upon the significance of the heritage asset. This is point is not recognised in the policy or supporting text.		heritage assets. Policy DM 9 provides appropriate consideration of the impact of proposals on the significance of heritage assets, where relevant. The Council does not consider it necessary to repeat this policy here. No change.
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Policy DM51 Provision of Day Nurseries and Child Care Facilities

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
48	RDM156	DM51	No (not effective)	Not stated	There is a lack of attention to infrastructure requirements, in terms of health facilities, school places, and green/play space near to homes which will be accessible and safe for outdoor play by young children. Two new health centres are envisaged in Tottenham but there is no assessment of overall need. The assessment of the need for school places does not appear to reflect the implications of building high rise, largely one or two bedroom flats. What provision will there be for community facilities? Whilst the Council's recent school planning places document	Not specifically stated	Disagree. The Council considers that the Local Plan sets a positive framework for the provision of infrastructure, including social infrastructure, to appropriately support delivery of the spatial strategy for the Borough. Policies SP 16 and SP 17 set out the strategic approach in this regard, with other Local Plan documents giving effect to these strategic policies. The Council has prepared an Infrastructure Delivery Plan (IDP) which sets out

					<p>suggests an increased child population because of the regeneration, Policy DM51 (in the Development Management DPD) says that planning permission will only be given for a childcare facility if it does not result in the loss of a dwelling. The outcome of this policy is likely to be a shortage of childcare facilities, since commercial premises will rarely be appropriate for conversion to childcare use.</p>		<p>the service areas where investment will be needed to support growth over the plan period. The IDP will be reviewed and updated regularly over the life of the plan, reflecting delivery across these areas.</p> <p>DM 51 is not considered to restrict the scope of delivering childcare provision to meet need. The policy supports this use in appropriate residential and non-residential buildings and locations, however recognising the Council's position to protect against the loss of housing in line with other Local Plan policies.</p> <p>No change</p>
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Policy DM52 Burial Space

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
53	RDM176	DM52	Not stated	Not stated	As with the policy DM52, it should be noted that many burial spaces are of heritage interest and may be recognised as heritage assets. In these circumstances we would	Not stated.	Policy DM 9 provides appropriate consideration of the impact of proposals on the significance of heritage assets,

					seek to ensure the test for re use will take into account the potential impacts upon the significance of the heritage asset (including archaeological interest). This is point is not recognised in the policy or supporting text.		where relevant. The Council does not consider it necessary to repeat this policy here. No change.
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Policy DM53 Hotels and Visitor Accommodation

No comments received

Policy DM54 Facilitating Telecommunications Development

No comments received

Policy DM55 Regeneration and Masterplanning

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RDM90	DM 55	Not Stated	Not Stated	Workspace acknowledges the benefit of masterplanning in some instances and agrees with the draft wording of Policy DM55 which requires masterplans 'if appropriate'. Masterplans are a useful tool in demonstrating how a development on an area of land can be delivered without fettering or prejudicing future delivery of development on adjoining land. Such masterplans should not be approved as part of a development but used as background information in the Council's decision-making process.	Not stated.	The Council considers the requirement for site masterplanning provides certainty that individual site development proposals will not prejudice each other or the wider development aspirations of the Borough. The Council considers this policy is necessary to ensure delivery of the spatial strategy, and is

							therefore effective in line with national policy. The Council expects planning applications to come forward in line with the agreed wider masterplan. No change
21	RDM1 03	DM 55	No	Yes	<p>DM55 requires a masterplan to be prepared for the wider area and beyond to accompany development proposals for allocated sites. This would need to involve engagement with other landowners and occupiers of other parts of the allocated site.</p> <p>Whilst we can understand the benefits of a masterplan approach, demonstrating how individual submissions would not compromise future proposals and involving engagement with adjoining owners where possible, the Council should take a pragmatic approach to engagement with neighbours on a site by site basis.</p> <p>There may be circumstances where adjoining landowners are unwilling to engage or discuss proposals and such situations should not delay or hamper development proposals unnecessarily.</p> <p>The policy as currently worded is therefore not effective.</p>	The supporting text should explain that the level of engagement with neighbouring landowners should be proportionate to the proposed scheme, and if an applicant has taken on reasonable endeavours to engage with other landowners who are not forthcoming then the Council will not allow this to delay or hamper development proposals unnecessarily.	The Council considers Part B of the Policy to be sufficient without the suggested caveat, noting that any subsequent planning application would be subject to notification to all affected parties. No change
51	RDM1	Paragrap	Not	Not	Employment	The Mayor	The Council welcomes

	66	h 7.35	Stated	Stated	The Mayor welcomes the locally specific approach to Haringey's proposed employment policies that seek to reinvigorate and intensify areas of employment, where required, in order for Haringey to provide sufficient floorspace to meet its employment projections set out in Table 1.1 of the London Plan. This objective should also be reflected in paragraph 7.35 so that not only housing potential is noted, but also an intensified employment offer, where appropriate. The Mayor also welcomes the sequential approach to the redevelopment of non-designated employment land to provide similarly lower value land uses such as community infrastructure.	welcomes the locally specific approach to Haringey's proposed employment policies that seek to reinvigorate and intensify areas of employment, where required, in order for Haringey to provide sufficient floorspace to meet its employment projections set out in Table 1.1 of the London Plan. This objective should also be reflected in paragraph 7.35 so that not only housing potential is noted, but also an intensified employment offer, where appropriate	the support for its suite of employment policies. Policy DM 55 sets out principles for regeneration and masterplanning to ensure delivery of the spatial strategy. Paragraph 7.35 is used as an example where this approach can help with delivery in respect of housing. The Council does not consider it necessary to incorporate the suggested change here, as the Local Plan clearly sets out the objectives and policies in respect employment elsewhere in the Plan. No change
52	RDM1 69	DM55	Not Stated	Not Stated	Regeneration and Masterplanning– the principle of Policy DM55 is welcomed. Within the context of Crossrail 2 it will be	Clarify references to Crossrail and Crossrail 2 in	Policy DM 55 sets out principles for regeneration and

					<p>important to provide the necessary flexibility so that currently safeguarded land can, where appropriate change as a result of changing economic circumstances. Notwithstanding this, further flexibility may be required if full benefits from Crossrail 2 are to be realised. For example, the re-provision of existing employment facilities allowing for alternative development which capitalises on Crossrail 2 benefits and supports wider regeneration objectives to take place.</p> <p>Paragraph 7.35 refers to the positive impact that Crossrail will have on accessibility in the borough. It is unclear whether this relates to Crossrail 2 (which is proposed to directly serve the borough) or Crossrail (1), which will not. Should this relate to Crossrail 2; this should be made more explicit. The overall emphasis of this text is supported, although reference to maximising the transformative impacts of Crossrail 2 for development and regeneration should be referenced directly within policy DM55.</p>	<p>paragraph 7.35</p> <p>Incorporate direct reference to maximising the transformative impacts of Crossrail 2 in policy DM55</p>	<p>masterplanning to ensure delivery of the spatial strategy. Whilst recognising that the application of this policy will be particularly important to optimise the benefits of Crossrail 2, as provided in the supporting text, the Council does not consider it appropriate to list specific circumstances in the main policy text.</p> <p>The 2nd last sentence of Paragraph 7.35 amended to clarify reference to Crossrail 2 as follows:</p> <p>Another such example will be <u>Crossrail 2</u> which will redefine accessibility levels in parts of the Borough.</p>
53	RDM1 77	DM 55	Not stated	Not stated	<p>We support the inclusion of a policy that encourages the preparation of masterplans for site allocations and beyond. In the details of the policy or supporting text we would urge you to ensure that the accompanying masterplans include a thorough understanding of the historic environment, heritage assets, and their</p>	<p>In the details of the policy or supporting text we would urge you to ensure that the accompanying masterplans</p>	<p>Policy DM 55 sets out principles for regeneration and masterplanning to ensure delivery of the spatial strategy. Whilst recognising that the application of this</p>

					significance including setting. This baseline information of values and understanding should then be used to inform the principles of development articulated in the final masterplan. By including this aspect in the Council's expectations of masterplanning, would help align the policy with the NPPF and in particular paragraphs 58-61, and its reference to responding to local character and history, reinforcing local distinctiveness, and addressing integration of new developments with the historic environment.	include a thorough understanding of the historic environment, heritage assets, and their significance including setting.	policy will be important to ensure due consideration of the historic environment, the Council does not consider it appropriate to list specific requirements in the main policy text, where these are provided elsewhere in the Local Plan. No change.
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Policy DM56 Supporting Site Assembly

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
17	RDM91	DM 56	Not Stated	Not Stated	Workspace support the provision of this policy and the council's aspiration to achieve comprehensive redevelopment through compulsory purchase powers where necessary.	Not stated	Support it noted.

Appendix A Schedule of Locally Significant Views

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
22	RDM106	DM 5 & Appendix A	Not Stated	Not Stated	Policy DM5: Locally Significant Views and Vistas illustrated by Figure 2.1 Haringey Views (as below) and Appendix A Table 2 Schedule of Locally Significant Views seeks protection of local views across the borough. The basis of these views arises from the 1998 UDP and 2014 Urban Characterisation	Not specifically stated	It is recognised that the map is unclear and not aligned with the schedule of views in Table 5 of the Site

				<p>Study (assumed to be the 2015 Study).</p> <p>Figure 2.1 does not corresponded to the indexation of Appendix A and should be rectified, moreover, the viewpoints are not clearly cross referenced with the Urban Character Study (UCS) (2015) and the Tall Buildings Locations Validation Study (2015) to define the relevance and weighting of the viewpoints which should be addressed.</p> <p>We are concerned that the requirements of the policy may result in inevitable conflict with the development plan policy objectives for the Growth Area and therefore may not be technically 'effective'. As currently drafted the policy may fail for Wood Green.</p> <p>Haringey Council are planning to support a minimum of 6,000 new homes in Wood Green and a significant increase in employment generating floorspace. Clarendon Gas Works has permission for tall buildings, is part of the tall buildings cluster at the junction of Western and Coburg Roads, and lies adjacent to current tall building allocations. The Issue and Options Wood Green AAP confirms that "The redundant gasholders on the Clarendon Road development site are also highly visible, and their removal may emphasise the need for a landmark or significant building in this location as a wayfinding device".</p> <p>This approach needs to be balanced with the converging Locally Significant Linear Views (No.19, 20, 21, and 22) which cross the Wood Green Growth Area and Wood Green & Haringey Tall Building Area to Alexandra Palace. The Potential Tall Buildings</p>	<p>Allocations and Appendix A of DM DPD. A minor modification is proposed to amend Figure 2.1 for clarity and accuracy.</p> <p>An additional map will also be included showing the relationship between the significant views and tall building locations. This will aid assessment of proposals for tall buildings and will form part of the Tall Buildings and Views SPD.</p>
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					<p>Validation Study 2015 recognises that “There is potential for any development of tall buildings at this location (Wood Green and Heartlands) to be visible from several sensitive receptors, which will need to be considered in further detail”. The Study also refers to a “height limit” within the Growth Area, which St William has concerns about, albeit the report does not recommend what this might be, or how it might be assessed. We would be concerned if proposed height limitations arose out of non-development plan documents.</p> <p>Policy DM5 (Part A (a-c)) requires proposals in the viewing corridors of the Locally Significant Views to demonstrate how the proposal enhances the viewers’ ability to recognise and appreciate the landmark being viewed; makes a positive contribution to the composition of the local view; and meet the requirement of the Council’s Tall Buildings and Views Supplementary Planning Document (which does not yet exist). It is considered that requirements (a-c) are too onerous for key development sites in Wood Green and will not be effective, considering other development plan policies which promote development within these viewing corridors. We do not consider this wording to be effective, and it should be removed or reworded.</p>		
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Appendix B Article 4 Directions for Historic Environment

No comments received

Appendix C Town Centre Primary and Secondary Frontages

No comments received

Appendix D Saved Unitary Development Plan (UDP) Policy Replacement

No comments received

Appendix E Supplementary Planning Document and Guidance Replacement

No comments received

Appendix F Glossary of Terms

No comments received

No policy stated

ID	Rep ID	Policy / Para / Figure	Sound	Legally Compliant	Reason	Change Sought	Council's Comments / Response
9	RDM22	Not stated	Not Stated	Not Stated	<p>Responsibility to Haringey Residents</p> <p>Government policy makes council controlled building of homes difficult, but the plan should reference the 'Haringey Housing Needs Assessment June 2007'. Since then the situation will have been made worse; the shortfall of 3,405 social units/year over the following 5 years.</p> <p>The plan should indicate how Haringey intends to minimise the impact of government cuts and</p>	<p>The plan should indicate how Haringey intends to minimise the impact of government cuts and austerity policies on low-income household</p>	<p>Haringey's Strategic Policies Local Plan sets out the Council's approach to secure provision for a range of housing types and tenures in order to meet objectively assessed need and the Borough's strategic housing target over the plan period. The DM DPD helps give effect to the Strategic Policies and include requirements for affordable housing as part of new housing schemes.</p> <p>The Alterations to Strategic Policies Local Plan sets out the strategic</p>

					<p>austerity policies on low-income household in the borough. The plan should retain with proper investment the borough's council housing estates. A substantial new build programme for rented council homes is needed together with schemes for new build protected against the 'Right to Buy' Act so that the housing stock is not eroded.</p> <p>Demolition of housing estates is not the best solution, being disruptive for families schooling etc. with some not having secure tenure to support them during the renovations or in the interim. This method destroys local community support networks. It also involves partnership with large companies with all their commercial interests to contend with. To date there are over 3,000 council homes at risk of demolition.</p> <p>The policy that reduces council homes must be reconsidered in favour of a policy that respects communities and increases the stock of secure affordable tenancies.</p>	<p>in the borough.</p> <p>The plan should retain with proper investment the borough's council housing estates.</p> <p>The policy that reduces council homes must be reconsidered in favour of a policy that respects communities and increases the stock of secure affordable tenancies.</p>	<p>approach to housing estate renewal and improvement. This affects only a very small portion of Council housing stock and, ultimately, seeks its replacement in better quality development.</p> <p>Adopted Policy SP 2 includes criteria to ensure no net loss of existing affordable housing floorspace in development.</p> <p>The Council's Housing Strategy sets out Council's ambitious plans to build new Council homes and sets out the Tenancies Policy with respect to existing, new & renewed Council housing development.</p> <p>No change.</p>
14	RDM69	Section 2 and 4	Reserve position	Not Stated	In March 2015 the Trust responded to Publication of the Development Management Policies Consultation	Not stated	The response to the Trust on residential moorings was dealt with in respect of Alt47 to the Strategic

			n on this matter		Document. The Trust made comment on section 2: Housing and section 4: Environmental Sustainability. Whilst the Council's response to our comments on section 4 appear to be covered in the regulation 18 statement, our comments on section 2 do not appear to have been considered by the Council. As such we are unable to comment on the soundness of the plan in this regard as we are unable to understand the Council's position on the matter of the inclusion of a policy on mooring.		Policies. This states that the Council considers that the authority for increasing residential moorings lies with the Canal & Rivers Trust. Any proposal should first be discussed with the Lee Valley Regional Park Authority. While the Council is likely to support additional residential moorings, as a means of providing relatively cheap living accommodation, such provision would be treated as 'windfall' development, in regard to its contribution to meeting Haringey's housing needs. The role of the LPA in respect to moorings is to ensure waterside development does not detract from waterways usage. No specific policy is therefore required and the Council considers the impacts of increased residential moorings can be adequately addressed by other relevant policies in the Local Plan such as waste management Policy DM4 and DM29 on waste water and water supply. No change
14	RDM70	Section 2	Not Stated	Not Stated	As such we reserve our position to that set out in our previous response and request a meeting with the Council to discuss this matter. I would also like to request a meeting with the Council to discuss our	Not stated	The Council is happy to meet with the Trust at its earliest convenience. It would also be useful to understand what is meant by 'residential mooring' as Council understands this can take several

					representations on the Development Management DPD.		different forms, with each having different regulatory requirements.
20	RDM101	Not stated	Not Stated	Not Stated	<p>Muse Developments and the CRT welcome the generally positive approach taken in the Development Management DPD which further identifies the site in a Tall Building Growth Area.</p> <p>It is important however that policies within the Development Management DPD does not conflict with other Development Plan Documents and Area Action Plans.</p>	Not specifically stated	The Council does not consider there to be conflicts between the DPD policies. Where several designations apply to a development site, applicants will need to demonstrate how their urban design strategy has sought to address these, consistent with a design-led approach.
41	RDM141	General	No	Not stated	<p>We write on behalf of Power Leisure Bookmakers Ltd to make representations to the Haringey Local Plan pre-submission consultation – Development Management DPD (hereafter referred to as the ‘Plan’).</p> <p>Section 19 of the Planning and Compulsory Purchase Act 2004 requires that Development Plan documents or any other local development document must have regard to national policy documents and guidance as in the National Planning Policy Framework (‘NPPF’). For reasons set out below, this draft document is plainly contrary to the NPPF.</p> <p>Part 4, Regulation 8 Town and</p>	Not stated	Noted. The Council considers the policies of the Local Plan to be in general conformity with the London Plan and based on robust evidence. The Mayor for London has also confirmed that the policies are in general conformity with the London Plan.

				<p>Country Planning (Local Planning) (England) Regulations 2012 prescribes that that Local Plans must contain a reasoned justification of the policies. As set out in the National Planning Practice Guidance ('NPPG') (Paragraph 014. Reference ID: 12-014-20140306) “appropriate and proportionate evidence is essential for producing a sound Local Plan” and “evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan”. Paragraph 182 of the NPPF states that a local planning authority ('LPA') should submit a plan for examination which it considers is sound — namely that it is: positively prepared, justified, effective and consistent with national policy. It is considered that the Plan is not justified, as it is not founded on a robust and credible evidence base and does not offer the most appropriate strategy when considered against alternatives particularly in relation to betting shops.</p> <p>The London Plan forms part of the Development Plan and was adopted in March 2015. The Local Plan should be in general conformity with the London Plan. Policy 4.8 is concerned with Supporting a</p>		
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				<p>Successful and Diverse Retail Sector and Related Facilities and Services and states that the Mayor will, and boroughs and other stakeholders should, support a successful, competitive and diverse retail sector which promotes sustainable access to the goods and services that Londoners need. The London Plan Town Centres SPG (July 2014) states that Councils are encouraged to manage over concentrations of activities, for example, betting shops, hot food takeaways and pay day loan outlets. The supporting text outlines current and potential mechanisms for managing the over-concentration of such uses. In particular, paragraph 1.2.28 states that if the concentration of a use has reached saturation levels where the negative impacts outweigh benefits, local authorities can set thresholds at this level of saturation.</p> <p>We have reviewed Policies DM42, DM43 and DM46 (and the associated supporting text) of the pre submission version of the Development Management DPD and our response to the policies and text is set out below.</p>		
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