

Public Examination into the Haringey Core Strategy June 2011

Indicative Matters and Issues for Examination

Hearing 3

Matter 3 - Issues 3.10- 3.13

Does the Core Strategy provide a suitable and evidenced strategic direction for matters relating to climate change, waste management and water resources?

- i. The Core Strategy's approach for issues relating to water management and flooding is set out in policy SP5 and explained further by paragraphs 4.2.1 – 4.2.6 in the CS.
- ii. Haringey has had a Stage 1 Strategic Flood Risk Assessment carried out jointly with the 6 surrounding boroughs of Barnet, Camden, Enfield, Islington, Hackney and Waltham Forest.
- iii. This has been used to inform a draft site specific Sequential Test for the identified potential Housing sites, as published in the Core Strategy Proposed Submission Draft, May 2010.
- iv. In consultation with and in line with advice from the Environment Agency, this Sequential Test has been modified and finalised and published in association with the Submission Draft of the Core Strategy as supporting documentation.
- v. The Environment Agency has published a Statement of Common Ground with Haringey which confirms resolution of issues of concern relating to flooding.
- vi. Haringey is carrying out, in association with other North London Boroughs in the Drain London sub-region, a Surface Water Management Plan to identify issues with drainage networks and the effects of new development to feed into detailed policy on flood prevention and management.
- vii. Issues regarding the minimisation of the use of water, water recycling, SUDs and attenuation, have been discussed. The strategic lead is taken up by the Core Strategy and is to be followed through with detailed policy within the Haringey Development Management DPD and the Haringey Sustainable Design and Construction SPD.

- viii. Haringey proposes further minor change in the Core Strategy which will lead to the detailed policies in the DM DPD and SD and C SPD requiring the minimisation of water in demolition, construction and operation of new development as well as water recycling, SUDs and attenuation.
- ix. Haringey supports the development of the Thames Tunnel and the Lee Tunnel as important facets of the sewerage infrastructure servicing the borough.
- x. In the Schedule of Minor Changes, Haringey has proposed to add new paragraphs to the SP5 Water Management and Flooding which will add further detail on: water efficiency during construction and operation of new development; an improved linkage to the proposed Development Management DPD and the Sites DPD; and the need to address non-fluvial sources of flooding of development.

10. Issue 3.10

Are issues relating to flooding and PPS25, including the Sequential Test addressed adequately within the CS?

- 10.1 Haringey have previously carried out sequential work for proposed housing sites, published in the submission draft. Draft Flood Risk (PPS25) Sequential Test for Potential Housing Sites in Haringey, 2010 Produced by LBH Ref number LBH-54.
- 10.2 Working closely with the Environment Agency, it was proposed to carry out a further Sequential Test for the Growth Areas and Areas of Change as identified within the Core Strategy.
- 10.3 The Sequential Test has been carried out and is documented in the "Haringey Core Strategy Sequential Testing - Core Strategy Identified Areas of Development, 2011 Produced by London Borough of Haringey, Ref number LBH-55.
- 10.4 With the Inspector's agreement Haringey suggests a proposed further minor change to update the policy regarding flooding and the evolution of the Sequential Test CS SP5 policy. Page 98, policy SP5, 8th bullet points (last two within the policy) will be replaced. The amendment will read:
- 10.5 "In order to facilitate this, the Council: Has carried out a joint SFRA (Strategic Flood Risk Assessment) Stage 1 for the whole borough; Has carried out a Sequential Test for the Core Strategy Areas of Development (Growth Areas and Areas of Change)."
- 10.6 Furthermore, with the Inspector's agreement there will be a need to add further text making an additional proposed further minor change.

This would incorporate an updated reference to the Surface Water Management Plan work carried out by the Drain London project since the Core Strategy Submission document was drafted.

- 10.7 SP5 – Water Management and Flooding 9th bullet point (last bullet) will be amended to read:

“Haringey is carrying out, in association with other North London Boroughs in the Drain London sub-region, a Surface Water Management Plan to identify issues with drainage networks and the effects of new development. “

- 10.8 With the following text to be added after Paragraph 4.2.5:

“The Flood and Water Management Act 2010 brings responsibilities to local authorities for more comprehensive management of flood risk for people, homes and businesses. Haringey forms part of the Drain London Forum, a partnership including London boroughs, the Environment Agency and the Mayor of London which is formed to ensure the requirements from the Flood and Water Management Act 2010 are met in producing a Surface Water Management Plan (SWMP).

The development of SWMPs include a Preliminary Flood Risk Assessment for Haringey and other the other sub-regional boroughs to investigate and address flood risk problems. Haringey will maintain a public register of Flood Risk Management assets by 2015. Following the PFRA, the council will: Finalise a Surface Water Management Plan; Prepare a Hazard Map for 2013; and Prepare a Flood Risk Management Plan for 2015.”

- 10.9 The Haringey Development Management DPD and the Haringey Sites Allocations DPD will require further technical work to assess flood risk policy for particular development within the borough. This will entail a Stage 2 Strategic Flood Risk Assessment. This work will be commissioned by Haringey for the development of the detailed policy and identified sites to be fully expressed within these two DPDs.

- 10.10 In conclusion, the Environment Agency have stated that: “We are satisfied that the Council have applied the Sequential Test to the growth areas/areas for change identified in the Core Strategy in accordance with Planning Policy Statement 25: *Development and Flood Risk*. We also note the Council has made minor changes to address most of our comments to policies SP1, SP5, SP11 and SP13. We therefore accept that the flood risk issues raised in our representations to the Core Strategy (dated 21 June 2010) are now resolved.”

10.11 It is therefore considered that with the proposed further minor change and in stronger linkage with draft DM DPD and draft Sites Allocations DPD, policies and evidence base, that the Core Strategy addresses adequately the issue of flooding, including the Sequential Test and PPS25.

11. Issue 3.11

Should targets be included for the minimisation of water use?

- 11.1 Haringey will have regard to the impact of development proposals on water demand and existing capacity. In line with the London Plan, Haringey has discussed the feasibility of applying a maximum water use target of 105 litres per person, per day for residential development. A standard such as this will be updated by the then current standards in the Code for Sustainable Homes.
- 11.2 As a background to assessing the potential policy for the Core Strategy, Haringey has confirmed that Thames Water are required under current legislation to install a water meter if a property is new or converted, if the property has a pool, a power shower or uses a sprinkler. All commercial properties should have water meters and all properties should be metered if the water is used for non-domestic purposes.
- 11.3 It may be feasible therefore to set a “target” for water use and the monitoring could be carried out by the utility provider – Thames Water. The enforcement of such a target has been considered potentially impractical for a local planning authority to implement.
- 11.4 Haringey Policy SP5 therefore aims to strategically encourage lower water use through the implementation of the Code for Sustainable Homes and through Building Regulations where applicable. Policy also supports the installation of water metering into all new properties to encourage behavioural change in order to meet, as far as feasible, the London Plan target of 105l/p/d. The detail policy for this is to be included within the Haringey Development Management DPD and of the Haringey Sustainable Design and Construction SPD.
- 11.5 With the Inspector’s agreement Haringey suggests a proposed further minor change to incorporate this cross referencing of the policy regarding water use to the DM DPD and the Sustainable Design and Construction SPD. Page 98, policy SP5. The amendment will read:
- “Haringey will require the incorporation of water saving measures and equipment in all new development in order to meet the London Plan water consumption targets of 105l/p/d.”*

11.6 It is therefore considered that with the Minor Changes, the proposed further minor change and in combination with the DM DPD and Sites Allocations DPD, policies and the evidence base, that the Core Strategy addresses adequately the issue of the minimisation of water use.

12. Issue 3.12

Should reference be made to water recycling, SUDS and attenuation?

12.1 The Core Strategy policy SP5 currently states that all development will “implement Sustainable Urban Drainage Systems (SUDs) from strategic to individual site level to improve water attenuation, quality and amenity”.

12.2 This has further been added to by proposed Minor Changes which state that the “Development Management DPD and the Sites DPD will set out borough-wide standards and guidance respectively for managing flood risk , including those relating to: The use and design of SUDS;”

12.3 It is proposed that the link between the Core Strategy and these two supportive Policy Documents need s to be strengthened and that water recycling should also be specifically referred to within SP5.

12.4 With the Inspector’s agreement Haringey suggests a proposed further minor change to incorporate this cross referencing and clarification of the policy regarding water recycling, SUDs and water attenuation to the DM DPD and the Sustainable Design and Construction SPD to policy SP5.

12.5 The proposed further minor change will read:

“Development Management DPD and the Sites DPD will set out borough-wide standards and guidance respectively for managing flood risk, including those relating to: The use and design of SUDS; The use and design of water recycling; the use and design of water attenuation (in-line with the drainage hierarchy set out by the London Plan).”

12.6 It is therefore considered that with the Minor Changes, the proposed further minor change and in combination with the Development Management DPD and Sites DPD, policies and the evidence base, that the Core Strategy addresses adequately the issue of the water recycling, SUDs and attenuation.

13. Issue 3.13

Is the Thames Tunnel referenced adequately (in supportive terms) within the CS? Should it be included as a target and Strategic objective of the CS?

- 13.1 Reference is made to the Thames Tunnel within the Haringey Community Infrastructure Study (2010).
- 13.2 Haringey supports the development of the Thames Tunnel as a piece of strategic sewerage infrastructure, with the Inspector's agreement there will be a need to add some further text to take make it a target and strategic objective by supportive reference to this within the Core Strategy.
- 13.3 Reference is made within the Community Infrastructure study to the Thames Tunnel; however it is not referenced within the Core Strategy Submission draft. With the Inspector's agreement there will be a need to add further text to incorporate an updated reference to the Thames Tunnel and the Lee Tunnel, a proposed further minor change.
- 13.4 This reference will be inserted on page 99, after Paragraph 4.2.3 Water Demand the proposed further minor change will read:

“Sewerage Services. Haringey is served by both Beckton (Newham) and Mogden (Twickenham) main sewage treatment works. Thames Water own and manage the network of public foul and surface water sewers in Haringey and in London. Thames Water is implementing a number of Urban Waste Water Treatment Directive / Water Framework legislation-driven projects to improve the quality of water within London's rivers. These include improvements to the five largest Sewage Treatment Works (STW) discharging into the tidal reaches of the River Thames, to treat sewage to a higher standard before discharge and to fully treat more flow, as well as the proposed London Tideway Tunnels (Thames Tunnel and Lee Tunnel), each of which will deal with combined sewer overflows (CSOs), and also the partial replacement of the Deephams sewage treatment works.

Of significant strategic importance for London will be the proposed Lee Tunnel and the Thames Tunnel which aim to reduce the incidence of sewage discharges into the River Lee and the Thames respectively.”

- 13.5 It is therefore considered that with the Minor Changes, the proposed further minor change and in combination with the DMDPD and Sites Allocations DPD, policies and the evidence base, that the Core Strategy references adequately the Thames Tunnel.