

## Haringey Local Plan Pre-submission Response Form

### Pre-Submission Consultation 8<sup>th</sup> January – 4<sup>th</sup> March 2016

The Council is consulting on four Development Plan Documents (DPDs). These are the:

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

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

### How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the Word compatible version of this form which is available for downloading from the Council's website [www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan).

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they should only relate to the 'tests of soundness' and legal compliance (see guidance note at the back of this form, in the DPDs appendices and on our website for more information).

Complete the form overleaf and return to:

Local Plan team  
Level 6, River Park  
House,  
Wood Green  
London  
N22 8HQ

Or by email to:

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

Or complete it online at:


[www.haringey.gov.uk/localplan](http://www.haringey.gov.uk/localplan)

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4<sup>th</sup> 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](http://www.haringey.gov.uk/localplan) or email [ldf@haringey.gov.uk](mailto:ldf@haringey.gov.uk)

Ref:  (for official use only)	<b>Local Plan Publication Stage Response Form</b>	
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Name of the DPD to which this representation relates:

Local Plan: Development Management DPD

**Please return to London Borough of Haringey by 5pm on Friday 4<sup>th</sup> 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 <sup>1</sup>	2. Agent's Details
Title		Miss
First Name		Sophie
Last Name		Knapper
Job Title (where relevant)		Trainee Solicitor
Organisation (where relevant)	Paddy Power Leisure Bookmakers Ltd	Knights Professional Services Limited
Address Line 1	C/O Agent	The Brampton
Address Line 2		Newcastle-under-Lyme
Address Line 3		Staffordshire
Post Code		ST5 0QW
Telephone Number		01782 619225
Email address		sophie.knapper@knights1759.co.uk

<sup>1</sup> 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	DM42	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is (tick):

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

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

In our view policy DM42 is not Sound as the policy 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'. The policy is not consistent with national policy or with the London Plan and Town Centres SPG.

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.

(Continue on a separate sheet/ expand box if necessary)

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

The 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.

(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

This matter should be addresses and discussed with the Inspector at EIP.

*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:

04/03/2016