

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation 8th January – 4th March 2016

The Council is consulting on four Development Plan Documents (DPDs).

These are the:

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

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

How to Make Comments

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

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

Complete the form overleaf and return to:

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

Or by email to:

ldf@haringey.gov.uk

Or complete it online at:


www.haringey.gov.uk/localplan

To ensure your comments are considered, please ensure we receive them by **5pm on Friday 4th March 2016**.

Next Steps

In the summer of 2016 the Planning Inspector will hold an "Examination in Public" to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

For further information please visit www.haringey.gov.uk/localplan or email ldf@haringey.gov.uk

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

Local Plan: Development Management DPD

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" value="Miss"/>
First Name	<input type="text"/>	<input type="text" value="Sophie"/>
Last Name	<input type="text"/>	<input type="text" value="Knapper"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Trainee Solicitor"/>
Organisation (where relevant)	<input type="text" value="Paddy Power Leisure Bookmakers Ltd"/>	<input type="text" value="Knights Professional Services Limited"/>
Address Line 1	<input type="text" value="C/O Agent"/>	<input type="text" value="The Brampton"/>
Address Line 2	<input type="text"/>	<input type="text" value="Newcastle-under-Lyme"/>
Address Line 3	<input type="text"/>	<input type="text" value="Staffordshire"/>
Post Code	<input type="text"/>	<input type="text" value="ST5 0QW"/>
Telephone Number	<input type="text"/>	<input type="text" value="01782 619225"/>
Email address	<input type="text"/>	<input type="text" value="sophie,knapper@knights1759.co.uk"/>

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	DM46	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 DM46 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 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".

We suggest that Haringey consider the points raised within our representation letter and adopt the model policy text rather than the current text. On adoption of the model policy, we would then consider the Plan 'sound'.

(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 addressed 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