

## London Borough of Haringey Core Strategy

### Statement of Common Ground (SoCG)

Between

London Borough of Haringey (LBH)

And

Environment Agency (EA). **Position at 11<sup>th</sup> May 2011**

In respect of issue:

In respect of issue (document order)	Representation Ref. No.
Paragraph 1.4.24	16/8/1.4
Paragraph 3.1.5	16/9/2.1
SP5	16/10/4.2
SP5, paragraph 4.2.5 & 4.2.6	16/10/4.2
Paragraph 4.2.5	16/12/4.2

### Background

This Statement of Common Ground relates to a number of representations made by the EA to the Council's Proposed Submission Core Strategy DPD (June 2010). At submission stage LBH submitted the Proposed Minor Changes addressing the EA representations. However, EA still had concerns over the evidence base to support SP1 and SP5.

In January 2011, the EA wrote to Haringey stating that the evidence base to support SP1 and SP5 was not in line with PPS12 and PPS25. Text amendments were proposed by the EA and Haringey accepted these amendments. However, to ensure that SP1 and SP5 are fully supported and robust by updated evidence the Council produced "Haringey's Core Strategy Sequential Testing – Core Strategy Identified Areas of Development".

This Statement of Common Ground takes an opportunity to confirm agreement between both parties on the evidence base to support policies SP1 and SP5 (letter from the Environment Agency on the 5<sup>th</sup> May also confirms this agreement, attached below).

Environment Agency					
Rep. Ref. No.	Para/Policy	EA submission (June 2010)	LBH response (June 2010)	EA Response	Review
16/8/1.4	1.4.24	Needs further clarification of sequential testing	<p>Replace existing paragraph with:</p> <p><i><u>“Parts of the borough are in flood risk zones and the Council will take a strategic, risk-based approach to avoid placing inappropriate developments in areas at risk of flooding by applying the PPS25 Sequential and Exception Test. Mitigation and adaptation measures have an important role in managing the impact of future climatic changes”</u></i></p>	Agree and support this change.	
16/9/2.1	3.1.5	Policy is unsound as it is not consistent with National Policy PPS25: Development and Flood Risk (PPS25). It is not considered that the flood sequential work provided to date fulfils the requirement for Sequential and Exemption Testing for the Growth Areas and Areas of Change. Therefore since this policy has not been informed by this the policy is not justified.	<p>After first sentence in 3.1.5:</p> <p><i><u>“Development should also take account of natural constraints, particularly the risk of flooding”.</u></i></p> <p>New paragraph after 3.1.10 to read:</p> <p><i><u>“The sites within the Tottenham Hale Growth Area have</u></i></p>	Agree and support this change..	

Environment Agency					
Rep. Ref. No.	Para/Policy	EA submission (June 2010)	LBH response (June 2010)	EA Response	Review
			<i>undergone the Sequential Test (and where necessary the Exception Test) in accordance with PPS25 'Development and Flood Risk'. This has ensured that there are no alternative sites of lower flood risk where the development can be located (see the Sequential Test for Tottenham Hale)"</i>		
16/10/4.2	SP5	This policy is not sufficiently informed by the Sequential Test and so it is not deemed to be sound. The policy should be amended to reflect the results of these tests and reflect the strategic approach to flood risk in line with the evidence base of SFRA, Sequential Test, Thames catchment Flood Management Plan.	<p>Amend 8th bullet point to read:</p> <p><i>"has carried out a Joint SFRA (Strategic flood Risk Assessment) Stage 1 and a site specific Stage 2 for identified Housing sites and Tottenham Hale, a Growth Area within Flood Zones 2 and 3."</i></p> <p>At the end of paragraph 4.2.5 insert the following:</p> <p><i>"The Council will prepare Area Action Plans for Tottenham Hale and Northumberland Park. This more detailed work will be informed by the level 2 Strategic Flood Risk</i></p>	Agree and support this change.	

Environment Agency					
Rep. Ref. No.	Para/Policy	EA submission (June 2010)	LBH response (June 2010)	EA Response	Review
			<p><i>Assessments and will identify development sites and the quantum and type of development needed.</i></p> <p><i>Masterplanning exercises and development briefs will ensure that flood risk is considered at an early stage, at an appropriate scale, and in close consultation with the Environment Agency. Flood risk assessments for individual development proposals will need to demonstrate that the development is safe and can meet part (c) of the Exceptions Test in accordance with PPS25”.</i></p>		
16/10/4.2	4.2.6	Same EA submission as above.	<p>Insert new paragraph after 4.2.6 to read:</p> <p><i>“The DM and Site Allocations DPDs, informed by the level 2 SFRA, will set out borough-wide standards and guidance respectively for managing flood risk through development.</i></p>	Agree and support this change.	

Environment Agency					
Rep. Ref. No.	Para/Policy	EA submission (June 2010)	LBH response (June 2010)	EA Response	Review
			<p><i>including those relating to:</i></p> <ul style="list-style-type: none"> <li>▪ <i>The need to address non-fluvial sources of flooding;</i></li> <li>▪ <i>Requirements for site-specific Flood Risk Assessments;</i></li> <li>▪ <i>The use and design of SuDS;</i></li> <li>▪ <i>The design and layout of developments including setting built development back from rivers, watercourses and flood defences; and</i></li> </ul> <p><i>Requirements for implementation of flood resilient and resistant building techniques".</i></p>		
16/12/4.2	4.2.5	Refer to sequential test in paragraph 4.2.4.	Please see change in relation to representation reference 16/9/2.1 which addresses this comment.	Agree and support this change.	

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**Our ref:** NE/2006/000070/CS-01/EW1-L01

**Date:** 5 May 2011

Dear Ms Whelehan

### **Statement of Common Ground for Haringey Core Strategy Submission**

I refer to the Haringey Core Strategy Sequential Testing – Core Strategy Identified Areas of Development dated March 2011 (Document reference LBH-55). I also refer to the Schedule of Minor Changes listed among the submission documents.

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.

We look forward to working with the Council on future DPDs.

If you have any further queries please do not hesitate to contact me.

Yours sincerely

**Keira Murphy**  
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**Environment Agency**

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