


Ref:  (for official use only)	<b>Local Plan Publication Stage Response Form</b>	
-------------------------------------	---	--

Name of the DPD to which this representation relates:

**DM55**

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	MR	
First Name	ALEX	
Last Name	TRYFONOS	
Job Title (where relevant)	CHAIRMAN	
Organisation (where relevant)	TOTTENHAM BUSINESS GROUP	
Address Line 1	757 High Road	
Address Line 2		
Address Line 3	Tottenham	
Post Code	N17 8AH	
Telephone Number		
Email address		

<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	<u>A/C/D</u>	Policy	<u>AAP1</u>	Policies Map	<u>NT5</u>
-----------	--------------	--------	-------------	--------------	------------

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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.

A sound plan should be positively prepared  
The statutory examination of the Allocations DPD and Area Action Plans for Tottenham must consider that this scheme is the “most appropriate when considered against more reasonable alternatives based on proportionate evidence  
The evidence now out for consultation does not support a strategy based on a stadium scheme. The scheme was found by the Inspectors Report on the Archway Metal Company to deliver little or no benefit against tremendous adverse effects for established local business.  
The documents out for consultation are flawed in many ways.  
The Scoping Reports for both the Allocations DPD and The Area Action Plan provided no information as ‘to reasonable alternatives’ to the present proposed plan. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that “sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment and social factors.  
NT5 was an AAP prepared on the back of the existing THFC scheme for a sports and leisure destination. The concept that the area should be a major sport and leisure area was adopted as set in stone. It was not tested through consultation.  
The Master plan for NT5 was presented ahead of the AAP and DPD documentation  
The Council has commented that it was able to set objective strategies but this does not hold true in the evidence  
Six plans were drawn up by ARUP, one of which would have retained the existing local businesses. This or a variation of this was not presented as a reasonable alternative to the community. Strong representations by the Tottenham Business Group representing the threatened local sites to redress this by incorporating some of its features to the Council selected Option  
  
At the initial Consultation each version of the plan presented had no alternative to the demolition of local shops and businesses. These demolitions can only be directly attributable to the needs of the Stadium Development NT7

The needs of the Stadium Development were allowed to prejudice the NT5 plans. No reasonable alternatives were given.

NT5 is inherently linked to the Stadium. It is based on a scheme set to provide the new stadium with a grand entrance and maximum commercial dominance. To that end discussion of local proposals for modest changes to retain the local business base was not tolerated.

NT5 is unsound because the question remains whether in accordance with paragraph 182 of the NPPF it is 'justified' in the sense that is the most appropriate when considered against the more reasonable alternatives, based on proportionate evidence.

The Stadium Scheme has been acknowledged publicly as delivering paltry benefits" against the tremendous adverse effects for established businesses. This has been intensified by the new plans for a more intensively developed site.

There is no evidence and no information in any of the documents, which have been out for consultation during this process as to "reasonable alternatives' to the present proposed scheme. This is inconsistent with the EAPP regulations and the advice in paragraph 165 of the NPPF that 'sustainability which meets the requirements of the European Directive on strategic environmental assessment should be an integral part of the plan preparation process, and should consider the likely significant effects on the environment.

#### Evidence of Local Pressure for An Alternative to Demolition

Meeting of Representatives of TBG with Alan Strickland Cabinet Minister for Regeneration 13<sup>th</sup> June 2013

Petition of 2500 local names asking for an alternative to demolition.

Representatives were told they would all be required to move their businesses from the area and asked to join a "Steering Group for that purpose.

26<sup>th</sup> May 2013 Letter of 'Blight" received by affected Businesses (two days before last Consultation Meeting.

8<sup>th</sup> October 2013 Haringey held meeting with affected businesses at the Irish Centre.

Alan Strickland and Lyn Garner, Director of Regeneration attended

Mr. Strickland again confirmed that all businesses would have to move.

Lyn Garner Director of Regeneration confirmed, "There would be no more metal bangers allowed in the area", a remark that was later apologized for by Mr. Strickland.

8<sup>th</sup> October 2013 The Designated "Steering Group' formed into The Tottenham Business Group.

28<sup>th</sup> November 2013 Deputation to the Cabinet by The Tottenham Business Group presented the Petition (now with over 4000 signatures) requesting the protection of local businesses an alternative to demolition

Presentation of 4000 signatures asking for alternatives to demolition.

Response by Alan Strickland Cabinet Member for Regeneration included the pledge to 'explore options which would retain ' the threatened high street shops and businesses.

25<sup>th</sup> February 2014 Chairman and Vice Chair of TBG met with ARUP designer Alan Strickland and Lyn Garner. They were shown 6 alternative plans that had been considered by the Cabinet prior to the June Consultation, They were told no consideration of alternatives or modifications.

#### 6. What modifications are necessary

The wishes of the Community as demonstrated in the PETITION presented on the 28<sup>th</sup> November 2013. Should be responded to by considering reasonable alternatives to the demolitions which will have such tremendous adverse affects for local business. A scaling down of the development concessions to THFC and a scaling up of consideration for the established local businesses which now provide a substantial employment base and core local shopping for the existing community(particularly ethnic specialist).

The exclusion of the community from the initial stages of the formulation of the Plan, their continued pressure for an alternative to save established local business and the failure of Haringey to address this issue is a huge omission. The plan cannot be claimed to be robust unless there is a resolution.

(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.

7. 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 wishes of the Community as demonstrated in the PETITION presented on the 28th November 2013. Should be responded to by considering reasonable alternatives to the demolitions which will have such tremendous adverse affects for local business. A scaling down of the development concessions to THFC and a scaling up of consideration for the established local businesses which now provide a substantial employment base and core local shopping for the existing community(particularly ethnic specialist).

(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.***

8. 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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

The exclusion of the community from the initial stages of the formulation of the plan, their continued pressure for an alternative which will save the established business community and the failure of Harringey to address us is a huge flaw and omission. The plan cannot be claimed to be robust unless there is resolution


*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.*

10. Signature

A. Tryfonos

Date:

1.3.2016

Ref:  (for official use only)	<b>Local Plan Publication Stage Response Form</b>	
-------------------------------------	---	--

Name of the DPD to which this representation relates: DM55

---

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>2</sup>	2. Agent's Details
Title	MR	
First Name	ALEX	
Last Name	TRYFONOS	
Job Title (where relevant)	CHAIRMAN	
Organisation (where relevant)	TOTTENHAM BUSINESS GROUP	
Address Line 1	757 High Road	
Address Line 2		
Address Line 3	Tottenham	
Post Code	N17 8AH	
Telephone Number		
Email address		

---

<sup>2</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	<u>B/D</u>	Policy	<u>AAP1</u>	Policies Map	<u>NT7</u>
-----------	------------	--------	-------------	--------------	------------

4. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

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.

A sound plan should be justified and effective  
The Draft site NT7 was based on the NDP scheme promoted by THFC. Original permissions were granted on the basis of planning policies contained in the UDP, which were withdrawn. The developments were perpetuated based on a former planning regime when new sustainable policies had been prepared that could have secured more sustainable planning outcomes.  
There were a number of schemes/alternatives that were better  
Than the NDP scheme but the site application was not flexible enough to have captured these benefits from different options.  
The proposed scheme does not significantly improve the economic and social wellbeing of the area, which was confirmed by the Inspectors report on the CPO inquiry into Archway Metals `company.  
It was made clear that converting the NDP scheme to a site allocation would depend on public sector funding which could be more effectively invested in a more appropriate regeneration and environmental purposes.  
This position has been exacerbated by the new Stadium application, which allows a massively increased stadium size and huge elevations for additional development on the South side.  
The site was originally allocated to reflect approved planning application when it was in fact the subject of a prolonged CPO inquiry, it should have been selected on the basis of a legally compliant SEA and Sustainability Appraisal. This is surely unsound unlawful practice.  
The Draft Site Allocation did not consider the merits of alternative schemes and is solely based on a scheme promoted by THFC. It shows a profoundly flawed methodology which is not a sound basis for established land use allocations within a Site Allocation DPD under Part 2 Of the Planning and Compulsory Purchase Act 2004(as amended) the regulations and the NPPF

(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.
- 7. 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.

ethnic specialist).

(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.**

- 8. 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

9. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary


This organisation is concerned that the basis for this Plan should be fair and robust. We have much experience and expert knowledge of its development being closely involved at every stage

*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.*

10. Signature

A. Tryfonos

Date:

Ref:  (for official use only)	<b>Local Plan Publication Stage Response Form</b>	
-------------------------------------	---	--

Name of the DPD to which this representation relates:

**DM49**

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

	11. Personal Details <sup>3</sup>	12. Agent's Details
Title	MR	
First Name	ALEX	
Last Name	TRYFONOS	
Job Title (where relevant)	CHAIRMAN	
Organisation (where relevant)	TOTTENHAM BUSINESS GROUP	
Address Line 1	757 High Road	
Address Line 2		
Address Line 3	Tottenham	
Post Code	N17 8AH	
Telephone Number	00447941137506	
Email address	tottenhambusinessgroup@yahoo.co.uk	

<sup>3</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:

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

Paragraph	<u>A/B</u>	Policy	<u>AAP4</u>	Policies Map	<u>NT5</u>
-----------	------------	--------	-------------	--------------	------------

14. Do you consider the Local Plan is (tick):

4.(1) Legally compliant Yes  No

4.(2) Sound Yes  No

4.(3) Complies with the Duty to co-operate Yes  No

Please tick as appropriate

15. 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.

A sound plan should be justified and effective

Haringey Council has an obligation to understand and provide support for its existing economy, The Locally significant employment sites in High Road West NT5 have been removed despite their strengths and against evidence in the Employment Land Study 2015 where paragraph 2.26 pledges to safeguard the best sites.

They fulfill all the economic and land use criteria in particular with regard to the provision of SME's and are part of a larger cluster of existing industrial activity. Their removal would inhibit the operations of the nearby industrial uses with which they interconnect

In the Employment Land Study March 2015 Consultation High Road West was described as “a locally significant site providing a range of B2 uses. It is recognised as well occupied actively marketed with good internal circulation and parking on site”. (5.15)

It was viewed as important to safeguard B2/B8 uses and recommended as vital that any B class jobs affected are either relocated to suitable premises or to existing employment sites that have potential for further intensification

The current plans show more floor space lost in B class use where evidence in the Employment Land Survey (5.136) showed a strong demand with growth forecast, while delivering growth in B2 class where demand is shown to be weak. In 2015 it recommended that any release of employment land should not be to the detriment of successful B2/B8 businesses.

The promise of replacing and resituating displaced sites to protect B2/B8 uses has not been carried through to the policy. In 2015 the Forecast demand for Industrial land was reduced by Haringey to just 32,000m2 up to 2026 However the Employment Land Study 2015 predicted a

total requirement of 137,000m2, which included a net reduction in demand.

Therefore the predicted increase in jobs will not be matched by an increase in workspace. This indicates that Haringey will not have the capacity to relocate the existing B2/B8 businesses Policies under DM49 have never been sustained in the High Road west NT5 Proposals and the underlying evidence has continually been ignored.

This is not in line with the NPPF guidelines which states employment land should not be protected ONLY where there is NO PROSPECT of it being used.

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

16. 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.

17. Please set out what modification(s) you consider necessary to make the Local Plan As Chairman of the Tottenham Business Group I am not qualified to judge what steps are necessary to prevent the loss of the valuable employment base provided by the existing established SME's and B2/B8 uses with no certainty that sufficient new employment demand will be delivered or that it will be able to be filled locally.

---

(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.**

18. 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

19. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary

This organisation is concerned that the basis for this Plan should be fair and robust. We have much experience and expert knowledge of its development being closely involved at every stage. As a group made up of those established SME's which provide a substantial employment base our presence should be required.

*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.*

20. Signature

A. Tryfonos

Date:

## **Making a Representation: Guidance Note**

### **Haringey's Local Plan Pre-Submission Consultation**

**8<sup>th</sup> January – 4<sup>th</sup> March 2016**

The Local Plan documents have been through a number of stages of consultation. The outcomes of each stage of consultation have in turn informed the next stage of development of the documents. The current stage of consultation offers the final opportunity to comment on the draft documents before it is submitted to the Planning Inspector for Independent Examination.

The previous stages of consultation offered wide opportunity to contribute to the development of the policy documents. As the final drafts, any comments made on the documents at this stage may not result in a change but will be recorded and considered alongside the documents at Examination. This will mean that all comments and representations will be made public. This will be the last stage to comment on the Local Plan documents unless requested by the Inspector.

#### **How to respond to Local Plan documents at this stage?**

If you seek a change to any of the document your comments should state clearly what you want changed and why, and you should provide evidence to support these proposals. You should provide wording, where relevant, for the changes proposed.

The documents should be consistent with national and regional policy. If you think this is not the case you should state clearly the reasons why. If you feel that an additional policy should be included in the Local Plan documents, which go against national or regional policy, in order to meet a clearly identified and justified local need, you should state what the local circumstances are and provide supporting evidence.

If you think another policy should be included please ensure the issues are not already addressed in:

- national or regional policy; or
- in the other Local Plan documents.

If the issues are not addressed elsewhere, please state why your suggested policy should be included in the specified Local Plan document and what it should say.

The Local Plan documents must meet two key criteria before it can be submitted and adopted. During Examination the Planning Inspector will only consider comments which refer to these criteria. Therefore, when making representations please keep in mind the following:

**Has the Local Plan documents met the following legal requirements?**

Has it been prepared in accordance with the Local Development Scheme, which sets out the work programme for the Local Plan?

Is it in compliance with the Statement of Community Involvement, which sets out how the Council will involve the community in the preparation of planning documents and in considering planning applications?

Has it been subject to a Sustainability Appraisal to examine the social, economic and environmental impacts of the policies?

Does it have regard to national policy?

Does it conform generally with regional policy as set out in the London Plan?

Is it in line with the objectives set out in Haringey's Sustainable Community Strategy?

Further detailed guidance on how to respond to the documents can be found

**Are the Local Plan documents sound?**

- Is the document justified?
  - Is it based on robust and credible evidence?
  - Is it the most appropriate strategy when considered against the alternatives?
- Is the document effective?
  - Is it deliverable?
  - Is it flexible?
  - Will it be able to be monitored?
- Is it consistent with national policy?

in the appendices of each document.

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

All responses must be received by 5pm 4<sup>th</sup> March 2016