

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	
--	---	--

Name of the DPD to which this representation relates:

**The Development Management
Development Plan Document**

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="Mr"/>
First Name	<input type="text"/>	<input type="text" value="Paul"/>
Last Name	<input type="text"/>	<input type="text" value="Woods"/>
Job Title (where relevant)	<input type="text"/>	<input type="text" value="Director"/>
Organisation (where relevant)	<input type="text" value="Capital and Regional Plc"/>	<input type="text" value="GL Hearn Limited"/>
Address Line 1	<input type="text" value="52 Grosvenor Gardens"/>	<input type="text" value="75 Wells Street"/>
Address Line 2	<input type="text"/>	<input type="text"/>
Address Line 3	<input type="text" value="London"/>	<input type="text" value="London"/>
Post Code	<input type="text" value="SW1W 0AU"/>	<input type="text" value="W1T 3QH"/>
Telephone Number	<input type="text"/>	<input type="text" value="020 7580 5886"/>
Email address	<input type="text"/>	<input type="text" value="Paul.woods@glhearn.com"/>

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	<input type="text" value="DM11"/>	Policies Map	<input type="text"/>
-----------	----------------------	--------	-----------------------------------	--------------	----------------------

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

4.(1) Legally compliant	Yes <input 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 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.

Capital and Regional (C&R) is one of the leading community shopping centre owners in the UK and currently operates eight major centres. C&R acquired The Mall at Wood Green in 1996, since which time it has made substantial investment to modernise both the malls and car park and to broaden the range of uses, introducing a cinema and restaurants. C&R has been a major investor in Wood Green for 20 years and is committed to further investment in the Mall to improve both the quality and range of its offer to visitors. C&R is a therefore a major landowner in Wood Green Town Centre and a key stakeholder in plans to bring forward development in the town centre.

Part C of Policy DM11 indicates that the Council will not support proposals which result in an over concentration of 1 and 2 bed units unless they are part of larger developments or within neighbourhoods where such provision would deliver a better mix of unit sizes which include larger and family units. Part A (a) of the policy states that the suitability of a proposed housing development would be considered, in part, on the basis of 'individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed'. There is an internal conflict between this part of the policy and Part C. The latter appears to apply an absolute requirement which fails to acknowledge that there may be individual site circumstances, as set out in Part A (a) that militate against such an approach. Part (A) of the policy sets out the criteria against which development will be considered and in our view provides sufficient guidance for determining planning applications.

We therefore consider that part C is neither justified nor effective and unsound on this basis.

(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.

On the above basis we recommend that part C should be deleted from the policy.

(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

As owner of the Mall Shopping Centre in Wood Green, Capita and Regional is a major landowner in Wood Green and therefore a key stakeholder in plans to bring forward development. Our representations raise important policy issues which we would wish to discuss at the oral examination.

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

Paul Woods

Date:

04/03/2016

Part B – Please use a separate sheet for each response

Name or Organisation:

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="DM40"/>	Policies Map	<input type="text"/>
-----------	----------------------	--------	-----------------------------------	--------------	----------------------

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

4.(1) Legally compliant	Yes <input 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 type="checkbox"/>	No <input type="checkbox"/>

Please tick as appropriate

12. 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.

The Council's policy approach to protection of employment land is confused. Policy DM40 has been redrafted since the preferred options version such that it specifically relates to the loss of non-designated employment land. There is now no similar policy relating to the protection of designated employment land.

Under the heading building a strong, competitive economy, paragraph 21 of the NPPF indicates that investment in business should not be overburdened by the combined requirements of policy expectations. It is noted that policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. Paragraph 22 notes that planning policies should avoid the long term protection of sites allocated for employment uses where there is no reasonable prospect of a site being used for that purposes and that alternative use of land and buildings should be treated on their merits having regard to market signals and the relative need for different land uses.

In our view, the draft policy is far too onerous in relation to non-designated employment land and floor space having regard to the above national policy guidance. Such a policy approach may be more suited to designated employment sites (albeit even then a 3 year marketing campaign seems excessive), however a more flexible approach should be taken in respect of non-designated employment sites with proposals judged on their merits having regard to market signals and the relative need for different land uses.

We therefore consider that the policy as currently drafted is unsound in that it is neither justified nor effective and is inconsistent with national planning policy.

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

13. 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.

We recommend that the heading of the policy should be reworded to relate to 'Loss of designated employment land and floorspace'. In part A of the policy, the reference to 'non-designated' should be changed to 'designated'.

(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.

14. 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

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

As owner of the Mall Shopping Centre in Wood Green, Capita and Regional is a major landowner in Wood Green and therefore a key stakeholder in plans to bring forward development. Our representations raise important policy issues which we would wish to discuss at the oral examination.

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.

16. Signature	<i>Paul Woods</i>	Date:	04/03/2016
---------------	-------------------	-------	------------

Making a Representation: Guidance Note

Part B – Please use a separate sheet for each response

Name or Organisation:

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

Paragraph		Policy	DM55	Policies Map	
------------------	--	---------------	------	---------------------	--

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

4.(1) Legally compliant	Yes		No	
4.(2) Sound	Yes		No	X
4.(3) Complies with the Duty to co-operate	Yes		No	

Please tick as appropriate

19. 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.

The policy indicates that where development forms part of an allocated site, the Council will require a masterplan to be prepared for the wider site and beyond if appropriate to demonstrate that the proposal will not prejudice the future development of other parts of the site.

In our view, preparation of a wider masterplan enshrined in development plan policy is unduly onerous on developers and may serve to frustrate development opportunities coming forward which would otherwise contribute the Council's policy objectives. Such matters should be the subject of consideration through the development management process having regard to the circumstances of individual applications. The wider site allocation will be the starting point for the Council and judgements should rightly be made on the requirement for supporting information and relationship to adjoining sites in the context of individual applications. We consider that the policy is unsound on the basis that is neither justified nor effective.

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

20. 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.

We recommend that Policy DM55 should be deleted.

(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.

21. 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

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

As owner of the Mall Shopping Centre in Wood Green, Capita and Regional is a major landowner in Wood Green and therefore a key stakeholder in plans to bring forward development. Our representations raise important policy issues which we would wish to discuss at the oral examination.

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.

23. Signature

Paul Woods

Date:

04/03/2016

Haringey's Local Plan Pre-Submission Consultation

8th January – 4th 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 4th March 2016**