

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:

Site Allocations 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	Ms	
First Name	Hannah	
Last Name	Liptrot	
Job Title (where relevant)	Secretary	
Organisation (where relevant)	Hillcrest Residents Association	
Address Line 1		
Address Line 2		
Address Line 3		
Post Code		
Telephone Number		
Email address	hillcrestra@outlook.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: Hillcrest Residents Association

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

Paragraph	<input type="text"/>	Policy	<input type="text"/>	Policies Map	<u>SA 44 (Hillcrest)</u>
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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.

We consider that the Haringey Local Plan Site Allocations DPD in its current form fails to meet some of the basic conditions and is unsound, for the following reasons

- The inclusion of SA44 (Hillcrest) in the site allocations DPD is not based on a strategy which seeks to meet objectively assessed development and infrastructure requirements (is not positively prepared)
- SA44 is not the most appropriate strategy when considered against reasonable alternatives (is not justified)
- SA44 is inconsistent with provisions of the NPPF (is not consistent with National Policy)

The evidence for these conclusions is laid out below.

The Plan is Not Positively Prepared

SA44 proposes the allocation of Hillcrest housing estate and the surrounding woodland as a potential site for new housing. The allocations says that the new buildings will be placed 'in the gaps that exist between the existing buildings.'

The 'gaps' on the estate consist of well-used amenity areas. One of these is an informal football pitch, supplied with goalposts and very heavily used for ball games. Additional housing on Hillcrest would almost certainly result in the loss of the informal football pitch. The impact of this loss on the health and

wellbeing cannot be assessed as the council have not included in its evidence base a full open space strategy and playing pitch strategy. The existing open space and biodiversity study shows that Hillcrest (SA44) is in an area of deficiency for several categories of open space and play space, and the previous playing field study (Atkins 2008) revealed Hillcrest to be on the border of the area deficient in playing fields.

Without an up to date playing field strategy the proposal to allocate an existing kick-about area for housing cannot be considered to be positively prepared. It is our understanding that Haringey is undertaking an open space and playing field study, but for the plan to be sound the evidence should come *before* the site allocations are made and not used to retrospectively support an allocation. The plan should be evidence led.

The plan is not justified (does not provide the most appropriate strategy when considered against reasonable alternatives.)

Site allocation SA44 in the Site allocations DPD is shown to include the whole of the Hillcrest Estate as well as the surrounding, SINC designated woodland. The site requirements say that the new buildings will be placed in the gaps between existing buildings on the site. The indicative capacity is given as 34 units.

It must be presumed that the 'gaps' in question include the estate amenity areas. These areas have been chosen by the local community (Highgate Forum Area) as a 'Local Green Space' in accordance with NPPF 76 and 77, this designation has been included as Policy OS3 in the emerging Highgate Neighbourhood Plan, which has been written in general conformity with the Strategic Policies of the emerging Local Plan.

The neighbourhood plan and its Policy OS3 (Local Green Spaces) has been subject to an independent sustainability appraisal (AECOM 2016). The full appraisal can be read here:

<http://www.highgateneighbourhoodforum.org.uk/wp-content/uploads/2015/12/Highgate-Neighbourhood-Plan-Environmental-Report-copy.pdf>

The appraisal determined the preferred option for Hillcrest to be allocated as Local Green Space:

"Protecting the existing open and green space in the long term could lead to wide ranging benefits. Most significant are benefits to existing residents of the estate (which comprises social housing), but there are also notable benefits from a heritage and biodiversity perspective. As such, a policy to designate Local Green Space (Option 1) is the preferred option when considered in terms of the majority of sustainability objectives."

The evidence in support of the allocation as Local Green Space is included in the '2nd Draft for consultation (Dec 2015) of the Highgate Neighbourhood Plan and can be read here:

<http://www.highgateneighbourhoodforum.org.uk/wp-content/uploads/2013/01/Local-Green-Spaces-evidence.pdf>

The Plan is not Consistent with National Policy

The NPPF requires that:

76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them.

The allocation of Hillcrest (SA44) for housing is not consistent with this policy.

The NPPF requires that (155) *A wide section of the community should be proactively engaged so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.*

Hillcrest is within the area of the Highgate Neighbourhood Forum (HNF). HNF contributed significantly to the previous draft of the Site Allocations DPD through the 'Call for Sites' process. The forum has worked hard with Haringey and Camden Councils meet the borough's housing targets while reflecting the vision for the area as laid out in the neighbourhood plan. Hillcrest was not included as a site by HNF because Hillcrest is not believed, by the forum, or the Highgate Community, to be a suitable site for sustainable development.

(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 following offers suggested amendments, in order to help ensure that the plan is sound:

Hillcrest (SA 44) should be deleted as a Housing allocation and put forward as a local green space allocation in conformity with Para 76 of the NPPF. As SA44 designated the whole of Hillcrest as a housing site, it is unclear whether the local green space designations (which are redlined in the neighbourhood plan) could co exist with the housing allocation. If SA44 is not deleted it should be modified to show the boundaries of the housing allocation, which should not encroach on the designated local green spaces and should not lead to the loss of designated or undesignated amenity/recreational green space.

(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 a group of community volunteers and members of the public, we have no expertise in making formal representations on the soundness of local authority documents.

We have put this response together from many hours of internet research and discussion, as an attempt to obtain a fair hearing for our views. We have no legal or professional representation and have not the resources to obtain any.

The Site allocation SA44 (Hillcrest) is our home and we sincerely believe that its inclusion in the Site Allocations DPD is unjustified. We hope that we have provided adequate evidence to support this view.

We feel that we may be better able to articulate our conclusions and highlight our evidence under questioning from an examiner and we respectfully request that we are allowed a hearing.

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:

27/02/2016

Making a Representation: Guidance Note 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**