

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](http://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:

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	2. Agent's Details
Title	Mr	
First Name	Stephen	
Last Name	Robinson	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Address Line 2		

Address Line 3

Post Code

Telephone Number

Email address

Part B – Please use a separate sheet for each response

Name or Organisation: Stephen Robinson

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

Paragraph	<input type="text"/>	Policy	<input type="text" value="DB18"/>	Policies Map	<input type="text"/>
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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.

I think that Haringey Council must have a basement policy- it is essential to ensure that there is appropriate development and that Haringey residents are protected from inappropriate basement development.

DB 18 is a reasonable start but it is pretty basic. There are many more policies that need to be added to protect residents from inappropriate basement development and protect them during the construction process.

My neighbour made a highly objectionable planning application which included an excessively large basement in a row of terraced houses on a steep slope in Highgate. I was shocked to learn that Haringey did not have a basement policy that was fully in force.

This is essential for the Council to have in order to protect Haringey residents from the actions of inconsiderate neighbours. There have been several instances where houses have fallen down due to basements and the impact on adjoining properties, particularly in terraced housing, is enormous.

I cannot think of many other areas in London with the distinct topography of Highgate with its steep hills. I appreciate policy has to apply to the borough as a whole, however, the risk of basement development on the steep hills of Highgate (particularly on terraced housing where many other people will be impacted not just the applicant) needs to be addressed by Haringey Council.

(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 residential basement policy needs strengthening. I suggest that the following clauses be added to the policy for residential properties: Many of these clauses have come from other London Councils such as Camden and Westminster. These clauses are additional to the existing policies set out in DB18

a) basement development does not involve the excavation of more than one storey below the lowest original floor level (except in the case of swimming pools) and should be within the existing footprint of the property

b) natural ventilation and daylighting should be used where habitable accommodation is being provided and ventilation and lighting should be energy efficient.

Note: The existing planning rules habitable accommodation must be applied to basement application. The shortage of land in Haringey must not allow sub-standard living accommodation to be created through basement development

c) Given the significant disruption of basement construction on adjoining neighbours, a construction management plan which demonstrates that the applicant will comply with the relevant parts of the Council's Code of Construction Practice and awareness of the need to comply with other public and private law requirements governing development of this kind

d) The Council may need a Code of Construction practice for basements, for example to deal with use of noise and vibration reducing equipment during the basement build or restricting the hours of operation of excavating

e) a basement extension will not be permitted where the purpose is to create a new dwelling house in the residential property or for the purpose of further sub-dividing the existing residential property. You have to control the use of basements to create new flats or dwelling house.

f) where a basement extension is to a terraced property, the impact on the terrace as a whole (not just the adjoining property) needs to be considered to ensure it is stable, particularly if the terrace is on a slope-

Note; Highgate has many steep slopes- the impact of building basements , particularly on terraced housing on steep slopes has to be considered and restricted. The Council need to devise an appropriate policy to deal with this issue

g) the cumulative impact of a number of basement developments in the same terrace needs to be carefully considered as well.

h) provide a satisfactory landscaping scheme, incorporating soft landscaping, planting and permeable surfacing as appropriate;

i) not result in the loss of trees of townscape, ecological or amenity value and, where trees are affected, provide an arboricultural report setting out in particular the steps to be taken to protect existing trees;

j) incorporate sustainable urban drainage measures to reduce peak rate of run-off or any other mitigation measures recommended in the structural statement or flood risk assessment;

k) protect the character and appearance of the existing building, garden setting or the surrounding area, ensuring lightwells, plant, vents, skylights and means of escape are sensitively designed and discreetly located;

l) protect heritage assets, safeguarding significant archaeological deposits and in the case of listed buildings, not unbalance the buildings' original hierarchy of spaces, where this contributes to significance;

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

I am willing to participate in the oral representation if it is helpful. As the adjoining owner of a property where a neighbour was applying for permission to develop an excessively large basement, then I believe my views on Haringey's basement policy are highly relevant.

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:

4.3.2016

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?

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?

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