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 Or by email to: Or complete it online at:

Level 6, River Park

House, ldf@haringey.gov.uk www.haringey.gov.uk/localplan

Wood Green London N22 8HQ

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:

Local Plan

Publication Stage Response Form



(for official use only)

Name of the DPD to which this representation relates:

Tottenham Area Action Plan

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. Perso	nal Details¹	2. Agent's Details
Title	Mr	
First Name	Edward	
Last Name	Crome	
Job Title (where relevant)	Planning Advisor	
Organisation (where relevant)	Environment Agency	
Address Line 1	Ergon House	
Address Line 2	Horseferry Road	
Address Line 3	Westminster	
Post Code	SW1P 2AL	
Telephone Number		
Email address	Northlondonplanning@environment -agency.gov.uk	

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.



Name or Organisation: Environment Agency

3. To which part of the Local Plan does this representation relate?						
Paragraph <u>1.29, 1.30</u>	Policy	Policies Map				
4. Do you consider the Local Plan i	s (tick):					
4.(1) Legally compliant	Yes x	No [
4.(2) Sound	Yes x	No				
4.(3) Complies with the Duty to co-operate	Yes x	No [
Please tick as appropriate						
5. Please give details of why you co or fails to comply with the duty-to If you wish to support the legal c with the duty to co-operate, pleas	o-cooperate. Please be as detail ompliance or soundness of the l	ed as possible. ∟ocal Plan or its cor				
Currently there is no reference to floo policies of the action plan. This is sup Tottenham AAP Sustainability Apprais	od risk, water resources or biodiv oported in sections 12.13.2, 12.1	ersity in the overare				
This plan shows that high levels of development are proposed for Tottenham Hale, much of which is in flood zone 2. Consequently new development in the area could exacerbate flood risk (to occupiers and/or to other buildings) by being in the flood zone as well as by increasing the risk of surface water and sewer flooding (by reducing the permeability of the ground and adding to the pressure on the combined sewers during heavy rainfall events). Also some other development sites are in critical drainage areas for surface water flooding.						
Management and mitigation of these potential negative effects should be provided by the Borough- wide flood risk management policies in the DM Policies DPD, which will apply equally to the Tottenham area, and on a site by site basis through the development guidelines in the Site Allocations.						
 Please set out what modification compliant or sound, having regal this relates to soundness. (NB ploperate is incapable of modificat modification will make the Local able to put forward your suggest detailed as possible. 	rd to the test you have identified lease note that any non-complia ion at examination). You will nee Plan legally compliant or sound.	at question 5 abovence with the duty to ed to say why this It will be helpful if y	re where o co- you are			



Name or Organisation: Environment Agency

7. To which part of	the Local Plan does th	is repres	entation relate?			
Paragraph	NT6, Polic	y		Policies Map		
8. Do you consider	the Local Plan is (tick)):				
4.(1) Legally complian	nt	Yes	Х	No		
4.(2) Sound		Yes	х	No		
4.(3) Complies with th co-operate	ne Duty to	Yes	Х	No		
Please tick as appropriate						
or fails to comply If you wish to su	nils of why you conside y with the duty-to-coop pport the legal complia co-operate, please also	erate. Ple ince or sc	ease be as detail oundness of the I	ed as possible. ₋ocal Plan or its co		
We are pleased to see that this site allocation has now been included in the Strategic Flood Risk Assessment as previously requested. We recommended including the site in the SFRA to highlight the potential for flood risk arising from the culverted Moselle Brook which runs through adjacent to the site. It is disappointing that the presence of the culvert, which is currently in poor condition, has not been included in the supporting text within the SFRA. We therefore seek an amendment to the SFRA to incorporate this. The Site allocation correctly identifies that the site falls in FZ2, but the development guidelines does not stipulate the requirement for an FRA to be submitted at the planning stage.						
10. 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 cooperate 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.						
risk, due to potential r also require a referen culvert.	e is addressed in the flow due lice to the need for an 8	to collaps 3m develo	se or blockage d ppment free buffe	uring flood events. er between the edg	We would ge of the	
Suggested wording to	or the site allocation si	te require	ements/developm	nent guidelines is b	elow:	

The Moselle Brook runs in a culvert adjacent to the site, and has been identified as being in a poor condition. Development proposals must consider the flood risk impacts of the Moselle Brook. No new buildings will be permitted within 8m of the edge of the culvert and it's condition must be

To address the lack of a requirement for an FRA we suggest that you include the same wording as



commensurate with the lifetime of the development.

The development will need to be designed having regard to risk of flooding and in accordance with the Strategic Flood Risk Assessment
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.
11. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
x No, I do not wish to participate at the oral examination Yes, I wish to participate at the oral examination
12. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary
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.
13. Signature Date:

is included in other sites such as TH9;



Name or Organisation: Environment Agency

14.	14. To which part of the Local Plan does this representation relate?							
Par	agraph	<u>NT7</u>	Policy		Policies Map			
			J		J			
15.	Do you consider	the Local Plan	is (tick):					
1 (1) Logally complian	n+	Yes		No			
4.(1) Legally compliar	п	162	X	No			
4.(2) Sound		Yes	Х	No			
`	,							
4.(3) Complies with th	ne Duty to	Yes	Х	No			
CO-C	perate							
Please tick as appropriate								
16.	16. 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							
	•		•	is box to set out yo		прпапсе		
	mar and duty to c	o operato, piec	200 4.00 400 111	io den le doi dui ye	ar commone.			

We are pleased to see that this site allocation has now been included in the Strategic Flood Risk Assessment as previously requested. We recommended including the site in the SFRA to highlight the potential for flood risk arising from the culverted Moselle Brook which runs through adjacent to the site. It is disappointing that the presence of the culvert, which is currently in poor condition, has not been included in the development guidelines in the site allocation. We therefore seek an amendment to the allocation to incorporate this.

The Site allocation fails to identify that the site falls in FZ2, but the development guidelines does not stipulate the requirement for an FRA to be submitted at the planning stage.

17. 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 cooperate 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.

It is key that this issue is addressed in the flood risk guidance as culverts represent a major flood risk, due to potential restrictions in flow due to collapse or blockage during flood events. We would also require a reference to the need for an 8m development free buffer between the edge of the culvert.

Suggested wording for the site allocation site requirements/development guidelines is below:

The Moselle Brook runs in a culvert adjacent to the site, and has been identified as being in a poor condition. Development proposals must consider the flood risk impacts of the Moselle Brook. No new buildings will be permitted within 8m of the edge of the culvert and it's condition must be commensurate with the lifetime of the development.

To address the lack of a requirement for an FRA we suggest that you include the same wording as



The development will need to be designed having regard to risk of flooding and in accordance with the Strategic Flood Risk Assessment
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?
x 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
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 Date:

is included in other sites such as TH9;



Name or Organisation: Environment Agency

21.	21. To which part of the Local Plan does this representation relate?						
_			1		7 		
Para	agraph	NT4, NT5, NT7, TH2, TH3, TH6, TH7, TH8, TH13	Policy		Policies Map		
22.	Do you consid	der the Local F	Plan is (tick):				
ZZ.	Do you consid	der the Local F	riair is (tick).				
4.(1)	Legally comp	liant	Yes	Х	No		
4.(2)) Sound		Yes	Х	No		
• •	Complies witl o-operate	h the Duty	Yes	Х	No		
Pleas	se tick as appropri	ate					
23. 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.							
				e falls in FZ2, and to be submitted at			
24. 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.							
To address the lack of a requirement for an FRA we suggest that you include the same wording as is included in other sites such as TH9;							
		will need to be Flood Risk Ass		ing regard to risk o	of flooding and in	n accordance	

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.

25. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?						
x No , I do not w examination	vish to participate at the oral		I wish to poral exami	participate at nation		
	26. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary					
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.						
27. Signature			Date:			



Name or Organisation: Environment Agency

28. To which part of the Local Plan does this representation relate?							
Paragraph <u>5.135</u>	Policy	<u>TH1</u>	Policies Map				
29. Do you consider the Local Plan is (tick):							
4.(1) Legally compliant	Yes	Х	No				
4.(2) Sound	Yes	Х	No				
4.(3) Complies with the Duty to co-operate	Yes	Х	No				
Please tick as appropriate							
30. 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. Paragraph 5.135 should include references to the need for ecological improvements to the area, alongside the improvements in amenity access. As a Local Authority you have responsibilities to ensure that spatial plans complement River Basin Management Plans and do not compromise the achievement of Water Framework Directive objectives. Water Framework Directive Actions for the River Lee have previously been raised, and the inclusion of references to these in the policy represents an opportunity for encouraging the improvement of the Blue Ribbon Network as a whole.							
31. 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.							

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.

32. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?						
x No , I do not wi examination	ish to participate at the oral		I wish to pral examin	participate at nation		
33. If you wish to partic consider this to be	cipate at the oral part of the ex necessary	amination, plea	se outline	why you		
•	or will determine the most apped that they wish to participate	, ,		opt to hear		
34. Signature			Date:			



Name or Organisation: Environment Agency

35. To which part of the Local Plan does this representation relate?						
Paga manul	O'C NEE	Delien		l marata		
Paragraph <u>s</u>	Site: NT5	Policy		Policies Map		
_						
36. Do you consider	r the Local Pl	an is (tick):				
4.(1) Legally complia	nt	Yes	Х	No		
4.(2) Sound		Yes	Х	No		
4.(3) Complies with to co-operate	he Duty	Yes	Х	No		
Please tick as appropriate	ı					
If you wish to su	to comply wi	th the duty-to- al compliance	e Local Plan is no cooperate. Pleas or soundness of ease also use this	se be as detailed the Local Plan	d as possible. or its	
The Development G Policy DM28 of the d strengthened by inclu the culvert. We have	raft Developr uding specific	ment Managei guidance on	ment Policies DPI	D. This wording	g can be	
As a Local Authority you have responsibilities to ensure that spatial plans complement River Basin Management Plans and do not compromise the achievement of Water Framework Directive objectives. Deculverting is designated as a Water Framework Directive Action for this site.						
38. 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.						
This wording should	be included i	n the Develop	ment Guidance fo	or this site alloca	ation:	
The Moselle Brook ru poor condition. Deve Brook. No new buildi must be commensur	lopment prop ings will be pe	oosals must co ermitted withir	onsider the flood in 8m of the edge of	risk impacts of t	he Moselle	

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.

39. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?						
x No , I do not wi examination	sh to participate at the oral		, I wish to poral examin	participate at nation		
40. If you wish to partic consider this to be	ipate at the oral part of the ex necessary	amination, plea	ase outline	why you		
•	or will determine the most apped that they wish to participate			opt to hear		
41. Signature			Date:			



Name or Organisation: Environment Agency

42. To which part of the Local Plan does this representation relate?						
Paragraph Sites: SS2, SS2, TG2, BG3, BG4	Policy		Policies Map			
43. Do you consider the Local Pla	an is (tick):					
4.(1) Legally compliant	Yes	х	No			
4.(2) Sound	Yes	Х	No			
4.(3) Complies with the Duty to co-operate	Yes	Х	No			
Please tick as appropriate						
44. 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.						
(Continue on a separate sheet/ expand box if necessary)						
45. 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 consider the site allocations sound however there are a number of inconsistencies in the wording for the development guidelines across sites which have the same constraint. The above sites listed contain different wording to other sites which are also in Source Protection Zones.						
We prefer the following wording to be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12).						
The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken.						
Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.						
(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



on the matters and issues he/she identifies for examination.
46. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?
X No, I do not wish to participate at the oral examination
47. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary
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.
48. Signature

After this stage, further submissions will be only at the request of the Inspector, based

representations based on the original representation at publication stage.



Name or Organisation: Environment Agency

49.	49. To which part of the Local Plan does this representation relate?						
Para	Sites; BG2, NT3, NT4, NT7, TH2, TH3, TH6, TH7, TH8, TH10, TH11, TH12, TH13	Policy		Policies Map			
50.	Do you consider the Local Plan	n is (tick):					
	•	,	· · ·	No			
4.(1)	Legally compliant	Yes [Х	No			
4.(2)	Sound	Yes	Х	No			
		-					
	Complies with the Duty operate	Yes	Х	No			
Please tick as appropriate							
51. 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.							
	Di di di di life di	()			1.01		
52. 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 consider the site allocations sound however the sites listed above lie within a Source Protection Zone and this has not been included in the development guidelines for these sites.							
The following wording must be applied to the above sites to ensure they are consistent with the other sites identified in Source Protection Zones (for example site SA12).							
The site lies in a Source Protection Zone and therefore any development should consider this receptor in any studies undertaken.							
Studies should be undertaken to understand what potential contamination there is on this site prior to any development taking place and where appropriate, a risk management and remediation strategy.							
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.

participate at the oral part of the examination?							
x No , I do not w examination	ish to participate at the oral		I wish to poral examin	participate at nation			
54. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary							
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.							
55. Signature			Date:				



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

