

London Borough of Haringey

Haringey Local Development Framework

**Issues and Options consultation of Development
Management DPD held March – May 2013**

Regulation 22(1)(c) Consultation Statement

July 2013

Contents

1. Consultation Overview
2. Consultation Methodology
3. Summary of responses
4. **The Council's Response**
5. Next Steps

Appendix 1 - Schedule of Meetings for engagement on draft Development Management Policies March - May 2013

Appendix 2 - Summary of comments received to the draft Development Management Policies Consultation Document March – May 2013

Appendix 3 – List of Contacts on the Council's Consultation Database

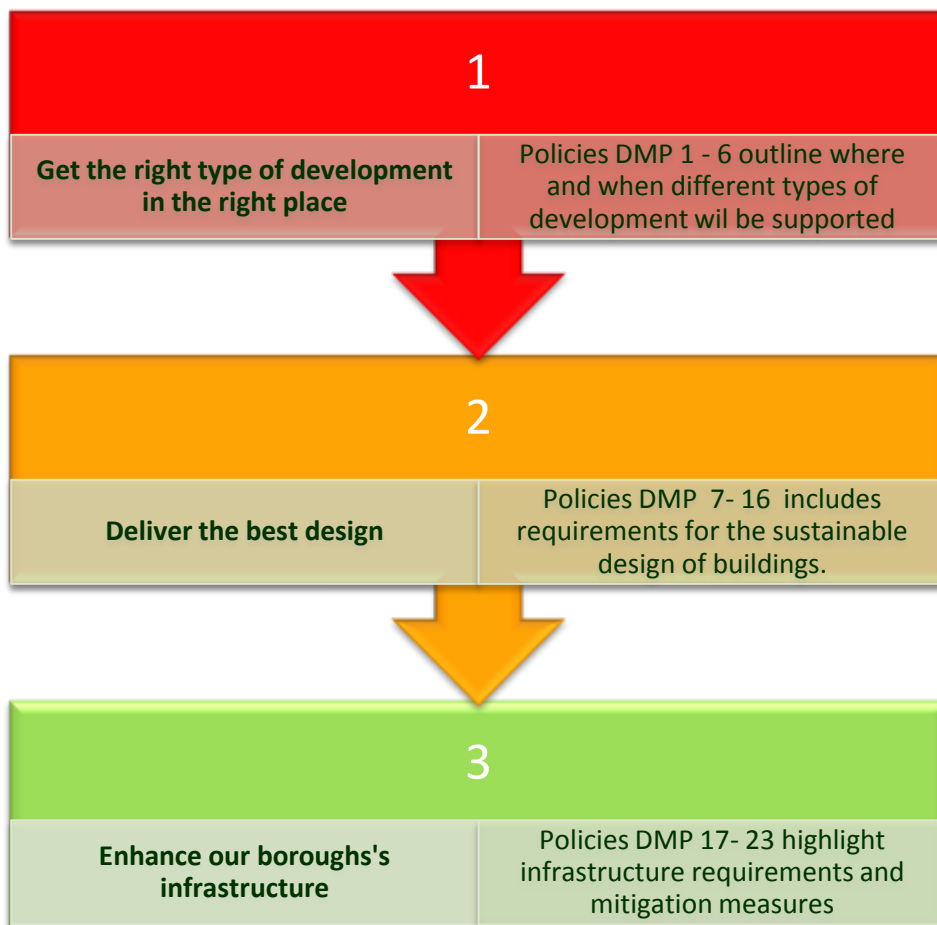
Appendix 4 – Individual Comments Received and the Council's Response

1. Consultation Overview

- 1.1 In March - May 2013 the Council sought views on the draft Development Management Policies (DMP) Consultation Document.
- 1.2 The DMP sets out more detailed planning policy requirements for new development proposals in Haringey and shows how the overall spatial **plan for the borough in the Council's Local Plan Strategic Policies will be** applied to individual sites through setting out requirements for developments in Haringey. Like the Local Plan Strategic Policies Document, the role of the DMP is to encourage growth and deliver sustainable development in Haringey in a way that reflects the vision and aspirations of local communities.
- 1.3 The document contains 23 policy approaches which are organised around three central considerations – or **'steps'** - to determine planning applications.
- 1.4 The first section is concerned with directing development to appropriate locations and ensuring a balance between land uses and in the case of housing, the types of accommodation that should be provided.
- 1.5 The second group of policies set out design requirements – incorporating environmental sustainability standards. The content and requirements in these policies is to some extent pre-determined by design and sustainability standards identified nationally and in the London Plan and the Local Plan Strategic Policies document.
- 1.6 The final group of policies address the need to mitigate any impacts of development on valuable infrastructure and identify the circumstances in which applicants will be required to provide additional infrastructure. This includes social community facilities such as schools; public realm

improvements; energy and utilities infrastructure; open space and a range of other types of infrastructure.

1.7 Section four at the end of this DMP provides further guidance on how the Council will implement these policies. Section five provides further information on the planning application process – including sources of further information and support.



1.8 In total representations comprising 370 individual comments were received. The consultation process allowed the Council to engage with key stakeholders, statutory consultees and local residents.

1.9 The consultation methodology and process were in line with Part 5, Regulation 12 (a) of the Town and Country Planning (Local Development) Regulation 2012, and the Council's Statement of Community Involvement.

2. Methodology

2.1 The consultation took place from 22 March until 10th May 2013. Letters and emails were sent to all consultees on the LDF database, including individual residents, **community and voluntary organisations, residents'** associations, other stakeholders and statutory consultees, notifying them of the purpose of the consultation, where to view the document and how to respond. A notice was placed in the Haringey Independent on the 22nd March providing all relevant information.

2.2 The relevant information and documents were made available on the **Council's website**.

2.3 A copy of the Consultation document was made available to view at:

- All Haringey libraries;
- Civic Centre - High Road, Wood Green, N22 8LE; and
- River Park House - Level 6, Wood Green, N22 8HQ.

2.4 Consultees were invited to submit comments through an online **"Snap"** questionnaire accessed from the website, or to write their own response via letter or email.

2.5 An information leaflet setting out the key points of the document, and how to participate in the consultation was sent to all consultees and were made available at local libraries and consultation events.

2.6 A number of meetings and events were held to encourage wide consultation and to provide a clear understanding of the function and scope of the document, and how to respond. A number of different issues

were raised at these events which were noted and will be taken into account when further developing the policies.

- 2.7 The main issue which arose at every meeting was residents' concerns about how these new policies will be enforced. Their experience was that current policies were either not implemented effectively or not enforced if breached.
- 2.8 The type, location and dates of the events are listed below. Further detail on the discussion at those meetings is set out in Appendix 1.

Drop-in sessions with information

- Hornsey Library, 10th April 2013, 3.30 - 7pm
- Marcus Garvey Library, 16th April 2013, 3.30 - 7pm
- Wood Green Library, 24th April 2013, 3.30 - 7pm

On street engagement with information as part of Bruce Grove Week of Action

- 17th and 18th April 2013, 1 - 3pm

Residents' and amenity groups meetings

- Planning & Licensing Training for Local Community Groups
Park View (West Green Learning Centre)
11th April 2013, 6.30 - 8.30pm
- Dowsett Estate Residents' Association and Friends of Down Lane Park
Mitchely Road Hall, Mitchely Road N17
16th April 2013, 7.15 - 9.15pm
- Pinkham Way Alliance
RPH - 6th Floor
25th April 2013, 2 -3pm

- Highgate Society and Highgate neighbourhood forum
10A South Grove, N6
25th April 2013, 6.45 - 8pm

- Haringey Federation of Residents Association/Tottenham Civic Society
Committee Room 1 Civic Centre
1st May 2013, 6-7pm

- Hornsey CAAC
Old School House, Tottenham Lane N8
6th May 2013, 6.30 - 7.30pm

3. Summary of responses

- 3.1 A total of 29 written responses were received which equated to 371 individual comments. Respondents comprised of community and amenity groups; statutory consultees; organisations; agents on behalf of stakeholder organisations; and individuals, all of whom have previously been involved in planning policy consultations.
- 3.2 The responses to the consultation generally supported the overall principle of the policies and there was some helpful advice to strengthen the policies. No response was fundamentally against our approach but offer a number of suggestions.
- 3.3 The main issues raised include:
- The need for more detail in the policies;
 - The need for new evidence, specifically in relation to housing, design, employment and open space;
 - Clarification of definitions and terms used;
 - Strengthening of wording in policy and supporting text;

- Ensuring flexibility in policies in order to assess cases on a site by site basis;
- Ensuring consistency with the NPPF;
- **The need for better reference to the London Plan and the Mayor's** guidance documents, and avoid repetition the London Plan policies;
- Consistency between the Local Plan and the Development Management policies;
- The need for improved cross referencing of DM policies;
- The GLA, English Heritage, and Environment Agency provided helpful suggestions relating to the scope of some policies, how to ensure conformity and how to strengthen text wording and supporting text;
- There is a significant concern for the effective implementation and enforcement of these policies.

3.4 A schedule of the summary of consultations can be seen in Appendix 2.

3.5 The responses highlighted the need for updated evidence particularly in relation to tall buildings, housing figures, open space designations and employment land need.

3.6 A number of consultees commented on the tone of the document and the lack of detail in the policies. Many felt that they could not provide a comprehensive response to the policies without additional detail. It was explained that as an early engagement document it was intended to present the proposed approach in an accessible manner, set out the overall principles of the policies, and include the specific details in the next version of the document following the consultation.

4. The Council's response

- 4.1 Following the consultation, the Council summarised all comments received and will take these comments into consideration, where appropriate, when preparing the next version of the document.
- 4.2 **The Council's response to comments received will make clear where a suggestion will or will not result in a change in the policy or supporting text.** Where a comment does not result in a change the Council we will provide a reason why. This could be that the issue is addressed in the Local Plan or the London Plan, or it may be beyond the remit of the DMP.
- 4.3 In response to the need for additional evidence to inform and support the policies a number of studies are underway. The Open Space study is currently out for tender; the consultants brief for the Urban Characterisation Study is being prepared; the updated Strategic Housing Land Availability Assessment (SHLAA) is underway; and the brief for the Strategic Housing Market Assessment (SHMA) is being prepared. The Employment Land Study was carried out in 2009 with an update in 2012. The Planning Policy team are considering the need for a further update on this study.
- 4.4 The Development Management Policies will be amended to take into account, where appropriate, the comments submitted to this consultation, the outcomes from the emerging studies, and national and regional policy and guidance.
- 4.5 Overall the Council found that the consultation on the DMP Consultation document was worthwhile and, although it received a relatively small response rate, the responses were informed and helpful.

5. Next Steps

- 5.1 The summaries of the comments have been assessed and the main **issues and concerns have been extracted. The Council's response to** each individual comment is in an appendix. This will then be made public on the Planning Policy web pages.
- 5.2 As set out in paragraph 4.3 the relevant evidence base studies are either underway or being commissioned. These studies are essential to shaping the policies and providing robust data and support for the document.
- 5.3 The amended policies will form the proposed submission DMP and will be consulted on in June 2014. The main reason for the extended time scale for the DMP is due to the current position with limited staff and resources, which means only one document can be brought forward at a time.
- 5.4 The Site Allocations is currently being prepared for consultation in November/December 2013. Following this consultation the Sites Allocations document will be at the same stage of development as the DMP. It is intended that these documents will then be brought forward together and examined simultaneously to reduce costs.
- 5.5 In preparation for the next stage of consultation, the Planning Policy team will continue to develop the policies; managing the commissioned studies; working with colleagues in relevant services and the LDF Members working group to strengthen and test the policies; and working with statutory stakeholders including the GLA and neighbouring boroughs to ensure sound and robust policies which meet NPPF and London Plan requirements.
- 5.6 The Planning Policy team will continue to work closely with Development Management colleagues to ensure the policies include relevant detail and

guidance, and to identify policy gaps and redundant policies from saved UDP policies and SPGs.

- 5.7 The proposed submission DMP will be brought to Cabinet in June 2014 to be agreed for public consultation. Consultation will be carried out in line with Part 5, Regulation 12 (a) of the Town and Country Planning (Local Development) Regulation 2012, and the Council's Statement of Community Involvement.

- 5.8 Following the proposed submission consultation, the policies will be further amended and improved before being submitted to the Secretary of State for examination. It is expected that the DMP will be ready for adoption end of 2014/early 2015.

Appendix 1

Schedule of Meetings for engagement on draft Development Management Policies March - May 2013

DATE and TIME	VENUE	TYPE OF MEETING	ATTENDING	FEEDBACK
10/04/2013 3.30 - 7pm	Hornsey Library	Drop-in session with information	Jill Warren	Attended by a mix of local residents - both those who attended intentionally and those who were using the library, and reps from Muswell Hill CAAC. A range of issues were discussed alongside the DM policies including Localism, planning enforcement, and Green Deal.
11/04/2013 6.30 - 8.30pm	Park View (West Green Learning Centre)	Planning & Licensing Training for Local Community Groups	Ciara Whelehan	Although there was a relatively small turn out (less than 20) the training was very well received with good engagement from those present.
16/04/2013 3.30 - 7pm	Marcus Garvey Library	Drop-in session with information	Jill Warren	Attended by a mix of local residents - both those who attended intentionally and those who were using the library, and reps from Tottenham CAAC. General discussion of the DMP doc – what's new, how does it affect Tottenham regeneration.

DATE and TIME	VENUE	TYPE OF MEETING	ATTENDING	FEEDBACK
16/04/2013 7.15 - 9.15pm	Mitchely Road Hall, Mitchely Road N17	Meeting with Dowsett Estate Residents' Association and Friends of Down Lane Park	Ciara Whelehan	Meeting was well attended. Discussion related to issues of HMOs, town centres, betting shops, littering and public urination, enforcement, and shop fronts. Information was given on how and when to respond to the consultation.
17/04/2013 1 - 3pm	Outside Lloyds Pharmacy on Tottenham High Road	On street engagement with information as part of Bruce Grove Week of Action	Gavin Ball	Stopping and talking to people on the street, and giving out information leaflets. Not a lot of discussion about the policies but a lot of people took leaflets to read.
18/04/2013 1- 3pm	Outside Lloyds Pharmacy on Tottenham High Road	On street engagement with information as part of Bruce Grove Week of Action	Clodagh McGuirk	Stopping and talking to people on the street, and giving out information leaflets. Some discussion especially relating to housing issues. A lot of people took information leaflets.

DATE and TIME	VENUE	TYPE OF MEETING	ATTENDING	FEEDBACK
24/04/2013 3.30 - 7pm	Wood Green Library	Drop-in session with Information	Jill Warren/ Clodagh McGuirk	Engaged with a mix of residents and library staff members. Concern about Wood Green Common – good resource, need to improve facilities there. Concerned about the closed petrol station to the west of the Mall is still boarded off and unused. Safety, peace of mind and infrastructure needed for new development. Enforcement issues: specifically in Conservation Areas and Listed and locally listed buildings. Specifically asked for policy on enforcement. Concern expressed about the two mini-roundabouts at the eastern end of White Hart Lane just to the west of the railway line. They cause problems for pedestrian and in particular those trying to catch a bus. Junctions should be changed. Need for consistent and improved design in neighbourhoods. Need for improved traffic and parking management. Concern about overcrowding and poor HMOs in the area.
25/04/2013 2 -3pm	RPH - 6th Floor	Meeting with Pinkham Way Alliance	Jill Warren/ Clodagh McGuirk	Meeting with three members of the PWA - some discussion about the definitions and consistency of terms of open space/land. Strengthen language used throughout document in next version. Majority of discussion centred around PWAs ideas for the Friern Barnet former sewage works site, and its possible uses in the future and how policy will apply.

DATE and TIME	VENUE	TYPE OF MEETING	ATTENDING	FEEDBACK
25/04/2013 6.45 - 8pm	10A South Grove, N6	Meeting with Highgate Society and Highgate neighbourhood forum	Cllr Strickland/ Ciara Whelehan/ Clodagh McGuirk	Discussion around the process of the consultations - Call for Sites and DMPs. Discussion around possible development sites. Each DM policy was discussed and local issues were raised and how each policy will apply to these issues. A large focus on improved and joined up approach to design - in relation to town centres, streetscapes and housing. The group expressed a concern about enforcement in the borough and asked if these policies would be effectively enforced. The group were preparing a written submission detailing their comments.
01/05/2013 6-7pm	Committee Rm 1 Civic Centre	Meeting with Haringey Federation of Residents Association/Tottenham Civic Society	Cllr Strickland/ Ciara Whelehan/ Clodagh McGuirk	Representatives from residents' associations and community groups. Discussion around the stages and process of the consultations. The residents expressed that proper implementation and enforcement are essential to ensure the policies are effective. They suggested that the policies be tested at each stage to ensure they are effective and realistic. Residents pointed out the need for strong policies which protect community interests. The group expressed the need for policies to contain sufficient detail, clarity, consistency and strong referencing.
06/05/2013 6.30 - 7.30pm	Old School House, Tottenham Lane N8	Meeting with Chris Mason - Hornsey CAAC	Sule Nisancioglu / Clodagh McGuirk/Nairita Chakraborty	Meeting with five members of the Hornsey CAAC. Discussion focused on materials used in townscapes, shopfronts, pavements, cross overs. The main concern from the consultees related to the management, implementation and enforcement of these policies.

Appendix 2

Summary of comments received to the draft Development Management Policies Consultation Document

March – May 2013

DMP 1 Employment and Business Uses
The policy should be rigorous in terms of criteria for releasing employment land for other uses, otherwise the authority will face numerous applications for higher value land uses (i.e. residential) on land allocated to meet the authorities economic needs.
Welcome the inclusion of policy wording that provides for the release of sites from employment use where it is demonstrated that a site is unviable as employment land.
The emerging policy should state that LBH will seek mixed use development with a mix of uses appropriate to the site, site setting and in response to local need and market demand.
Ensure policy is in line with London Plan and its guidance and improve referencing to these.
Evidence should be gathered to evaluate employment need before analysing where that need can be accommodated.
The policy is generally supported, however, more clarity is required to reflect policy SP8 of the Local Plan
There should be some flexibility within DM policy to allow for policing services on such land.
It is considered that a marketing period of 18 months is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. It is recommended that the policy is revised to allow marketing requirements to be agreed with the Council on a site by site basis once the nature of the site and specific issues are fully understood during pre-application discussions.
'Warehousing and logistics' ought to be added to the uses identified under Strategic Industrial Locations (SIL).

<p>Policy should be clearer how the criteria relates to the various types of industrial and employment land set out in London Plan and the Local Plan. A more rigorous approach to determining whether land is surplus to requirements in SIL should be applied, having regard to the Mayor's Land for Industry SPG (paragraphs 4.14 to 4.16).</p>
<p>The policy should make clear that sui generis uses which are equivalent to B class uses are explicitly supported within employment areas.</p>
<p>In line with London Plan, suggest that SIL be expanded to include 'and other waste' after 'recycling' and before 'facilities'.</p>
<p>More flexibility should be built into this policy and its supporting text to ensure consistency with the NPPF. Provision should be subject to considerations of need and viability, for example, the locality may not be suitable for such uses or there may already be an oversupply of these types of uses in the locality or their provision may not impact on the overall viability of the development.</p>
<p>Consistency with terms and definitions.</p>
<p>DMP 2 Retail and Town Centres</p>
<p>We do not consider that all of the issues in relation to retail and town centres have yet been identified or that the role both Tottenham Hale Retail Park and Ferry Island perform as a shopping centre in the Borough has been taken into account. Policy SP10 already supports further growth in the area. At present, this theme is not reflected in Policy DMP2.</p>
<p>The Council should adopt a positive and flexible approach towards proposals which seek to enhance the retail and/or leisure offer on the retail park and meet the varying needs of the surrounding communities.</p>
<p>The reference to community uses as being acceptable within town centres is welcomed and reflects Local Plan Policy SP10.</p>
<p>It is recommended that the policy provides flexibility to permit and encourage retail uses within Finsbury Park in line</p>

with adjoining borough policies and the London Plan.
Scale appears to be the only consideration in relation to town centre uses. The Council is encouraged to word this policy to ensure that the scale of retail, leisure and community development would be considered relative to the size, role and function of a town centre in line with London Plan Policy
The final paragraph of the policy box on page 12 states that “retail uses will generally not be permitted outside our District town centres”. This statement should apply to all town centres, not only District centres.
The aspiration to manage issues with respect to betting shops and hot food takeaways is supported.
Non retail uses should be limited in town centres to no more than 15 %. Various forms of food businesses should also be restricted to prevent local shopping centres being denuded of useful retail outlets.
The policy for retail uses and town centres is flexible so that it can respond to rapid changes in circumstances.
Policy DMP2 needs to reflect SP 10 more explicitly and set out the criteria for the designation of new town centres.
The policy should not completely preclude the loss of retail uses from Town centres. The provision of retail uses outside of existing town centres should be more appropriately justified through retail impact assessment (and sequential assessment, if required).
DMP 3 Meeting Housing Need
The policy must ensure flexibility to plan beyond this figure given the likelihood that housing need will increase over the plan period.
The policy wording must not be too rigid and should make clear that each site will be assessed on its merits and in light of the local context and character, transport capacity, existing and future PTAL and proximity to other infrastructure as envisaged by the London Plan 2011.

More clarity on student housing
Increasingly important that account is taken of site specific circumstances when assessing whether the dwelling types and sizes are appropriate. Consideration should be given to local housing types and sizes; identified needs, site constraints; and also to viability issues. These factors should be noted as being material considerations in the policy or within its supporting text.
DMP 4 Balancing Housing Tenure
Each proposal should considered on its own merits taking account of site specific circumstances and the policy should be drafted to take this into account.
The policy should refer to viability appraisals and include details of other factors that may influence provision. This proposed policy would also benefit from greater explanation as to the basis on which affordable housing provision will be negotiated and what factors will be considered as part of this negotiation.
The mix and split of tenures should be based on a site by site assessment of the character and tenure mix within the area to ensure the provision of mixed and balanced communities
In the detail on negotiating affordable housing include a reference to the impacts of the availability of affordable housing resources, viability, and maximisation as per London Plan Policy 3.12.
DMP 5 Managing Housing in Multiple Occupation
Conversions must be to a high standard if an area is not to be degraded. Extensions need particular care.
The proposed Article 4 Direction should cover the whole of the borough (not just the eastern wards, as currently proposed).
DMP 6 Managing Housing Conversions
Clearer definitions and explanations needed.

DMP 7 Good Design and Quality of Life
The Council should make it plain that the title of this policy extends to all forms of development
More emphasis should be placed on access to open space. While DMP21 deals specifically with open space, an overall policy on Quality of Life should inform residents and developers alike of the raft of studies showing how general well-being is enhanced by proximity to quality open space.
The Council needs to include more explicit wording on the need for quality hard and soft landscaping schemes to be prepared for major developments
The view from the Friern Bridge Retail Park over the Pinkham Way site up towards Alexandra Palace is a welcome relief from the harsh urban impact of the A406, as well as being an intrinsically fine view, and should be protected.
The aim of this policy should be to secure high standards of amenity through design. The policy must restrict new development that causes significant harm to the amenity of neighbour's buildings and for enhancing the amenity and vitality of surrounding streets and local resident's access to open space. It should also ensure that adequate space standards are provided and enforced.
With respect to peoples living conditions, The London Plan 2011 space standards should be applied as a 'minimum'. This policy should not therefore simply repeat the provisions of the London Plan and must add something new. The NPPF states that local plans should be succinct.
The draft policy must therefore provide a policy mechanism for LBH to assess the merit of planning applications against the provisions of the London Housing Design Guide and Haringey Housing SPD.
The policy lists possible local views that could be considered for protection. However, we consider that the London Plan already protects the strategic views of most importance and only once appropriate modelling has been undertaken can we make a view with respect to local views.
The acknowledgement that people deserve a safe environment is welcome and supported.

<p>The supporting text could then be expanded to reflect the policies intention of recognising and enhancing the positive aspects of the Borough and its component parts that contribute to its local distinctiveness.</p>
<p>We welcome the intention of including possible local views that could require protection. It would be useful to see the evidence for these views and to explore the option of developing a SPD that would help explain how they could be managed</p>
<p>We propose that the views of Alexander Palace from Tottenham and the Lee Valley should be included in protected views.</p>
<p>We think public art should be formally protected.</p>
<p>This policy needs to be more comprehensive to ensure it provides greater clarity and adequate coverage of issues.</p>
<p>Improving referencing to London Plan and suggestion on layout of policy.</p>
<p>The Council should consider whether a specific development management policy to promote the managed local protection of this view should exist within this document.</p>
<p>The Council should also seek to encourage designs that increase the permeability of sites, and establish a web of connections (making areas more pedestrian and cycle friendly), and increase access to strategic transport networks.</p>
<p>The supporting text and the policy itself should recognise that design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development.</p>
<p>Recommends that such a policy be made more precise as to the particular views to be protected and that such protection does not seek to fetter the reasonable requirements for tall and large buildings within existing designated employment and industrial areas.</p>
<p>Need to clarify what is meant by ‘good design’ which can be particularly contentious in CAs, where the existing character, rhythm and materials need to be enhanced.</p>

The principles proposed are admirable but must be enforced. The need to protect Conservation Areas such as Highgate at risk from overlarge and ostentatious development is a key requirement.
DMP 8 Sustainable Development and Climate Change
Will Haringey produce local guidance or will applicants be directed to other guidance? How many or what type of design measures will developments be expected to incorporate?
The Council may wish to include a cross reference within this policy or its supporting text.
Support for water conservation and the efficient use of water and this should be covered in Policy DMP8
We have no specific representations at this stage on the content of DMP 8, but note that it overlaps significantly with policy/chapter DMP10 and appears duplicative. We suggest that the two are amalgamated or consolidated.
We welcome the requirement for a sustainability statement to be submitted with all planning applications except “householder development”.
DMP 9 Waste, Demolition and Construction
Supports this policy approach, subject to it being applied flexibly so that reporting requirements for each development are proportionate and reasonable.
Policy should focus on ensuring that material arising from demolition is reused or recycled as far as possible.
Recommended that bespoke policies be developed for each. 1. Dealing with construction and demolition waste; 2. Addressing climate change and energy; and 3. Meeting the land requirements of the North London Waste Plan.

<p>We fully support the London Borough of Haringey making appropriate provision and recommend that the development management policies support the safeguarding of existing waste management sites and those allocated in the emerging North London Waste Plan.</p>
<p>An approach to managing freight issues associated with development should be incorporated in the policy.</p>
<p>The draft states that existing buildings should be conserved rather than demolished ‘where feasible and sustainable’. The CAAC heartily endorses this policy and the requirement to justify all demolition should be applied with vigour.</p>
<p>The final paragraph of DMP9 deals with the new NLWP and allocation of waste sites in general, it feels that this policy should show much stronger emphasis on the Council’s own criteria.</p>
<p>Although developers would normally seek to retain and reuse existing buildings where possible, there is no statutory or policy basis for enshrining the need to justify the demolition of a building that is not a heritage asset. The requirement should be removed.</p>
<p>DMP 10 Energy and Carbon Reduction</p>
<p>Perhaps it might be helpful to make some reference to the existence of the LBH Carbon Commission 40:20 Report</p>
<p>The policy should therefore be drafted to take account of site specific circumstances, viability and feasibility.</p>
<p>The viability aspect of this target should be retained through the drafting stages of this policy as in some cases the requirement may make development undeliverable.</p>
<p>The policy should be broadened to encompass a range of carbon saving methods.</p>
<p>LBH should intend to adopt the provisions of London Plan 2011 policy 5.2.</p>
<p>This policy must take into account viability of a scheme, or the constraints of the individual site in its prescription of the Code Level or BREEAM rating. The lack of flexibility within this policy puts a burden on developers that may make</p>

development on some sites unviable.
In principle we agree with this approach as it would be unreasonable to expect ever site to viably provide onsite provision.
The Council have not indicated whether Policy DMP10 will be subject to a viability appraisal or whether this will be subject to floor space thresholds or specific projects. On this basis we do not consider that at this stage the requirements are achievable or realistic and may hinder growth, whereby developers are constrained by deliverability.
Improve referencing to London Plan and strengthen wording.
While carbon reduction targets are required it must be recognised that solar panels if placed insensitively can damage a conservation area. Similarly there are considerable disadvantages to external insulation applied to listed buildings or those making a positive contribution to a CA.
The Authority considers that the Council has identified all the issues in relation to energy and carbon reduction.
Where on-site provision is not feasible or would be uneconomic, the policy should support consideration of the widest possible variety of offsetting options.
DMP 11 Heritage and Conservation
Reference should be made to the Mayor’s commitment to heritage- led regeneration (policy 7.9). In planning decisions policy 7.9 seeks to ensure that the design of proposed schemes should recognise the significance of heritage assets in their own right and be used as a catalyst for regeneration.
The need for proportionate and relevant information to be submitted with proposals, in order that the significance of assets affected and the impact of the development upon those assets can be fully assessed.
Recognition that heritage assets comprise of all designated assets including Registered Parks and Gardens, and non-

designated assets such as locally listed buildings.
Greater clarity that elements that positively contribute to the significance of conservation areas should be conserved. Where opportunities exist for development then this should enhance the significance of the conservation area.
where changes are proposed that they should be assessed against whether they would cause harm to the significance of the asset or assets.
The need for greater emphasis upon the conservation of archaeology, so that it is expressed more clearly, with a reference to Schedule monuments, known archaeology and yet to be discovered archaeology.
the need to improve energy efficiency should be given high priority, and that e.g. fitting solar panels to roofs that are not very visible from the street, fitting good solid wall insulation to facades that are not in themselves of great interest, and of internal insulation where internal character is not important, should all be encouraged.
The policies listed are admirable but they must be enforced. The requirement on developers to preserve and enhance the character of the CA must not be regarded as 'motherhood and apple pie ' but a statement of principle binding on all.
There is no specific reference to any of the other CAs in Haringey. We believe that there should be an analysis, even if only briefly, of every CA in Haringey
There is no reference to soft landscaping or external areas, and we would like to see clearer policy on this, particularly relating to front gardens and hard-standings, and the continuing problem of unsightly refuse bins.
DMP 12 Environmental Protection
The policy should contain criteria which permits development that may give rise to significant environmental effects if the wider benefits of the scheme (i.e. environmental, economic or social) outweigh the harm that would be caused.
The policy approach should also aim to improve on the existing situation wherever possible.

<p>We would add that piling foundations in areas of potential contamination should be also be appropriately assessed via a piling risk assessment.</p>
<p>Nature conservation is listed as an aim here but it is not clear how this is addressed in the policy, apart from possible impact of light pollution on nocturnal wildlife. Noise standards should be sufficiently rigorous that noise creep from a number of different developments is prevented.</p>
<p>The policy aim to ‘include appropriate environmental protection’ is nebulous, and too subject to equivocation. It feels that ‘appropriate’ should be substituted by a concept that is firmer and simpler, such as ‘the highest quality/ calibre’</p>
<p>Clarification on terms used.</p>
<p>DMP 13 Tall and Large Buildings</p>
<p>The policy wording as proposed is too rigid and should not be based on the geographical location of a site, but should be amended to make clear that applications for tall buildings will be assessed on their merits and in light of the local context and character.</p>
<p>The policy approach currently does not outline the potential impacts of shading and lighting on ecology (including watercourses) or how this impact should be addressed.</p>
<p>Issues affecting tall and large buildings within employment and industrial areas have not been considered or addressed in the consultation document.</p>
<p>The council only identifies Haringey Heartlands and Tottenham Hale as being potentially suitable locations for tall buildings. The council should add Northumberland Park Area of change as a location that is potentially suitable for tall buildings.</p>
<p>DMP 14 Basement Development</p>
<p>Risks from both fluvial and surface water flooding should be considered, as well as any potential for groundwater flooding.</p>

<p>The Council's Basement Development Guidance Note needs to be strengthened. The issues around hydrological problems and the stability of adjoining properties are too important to be glossed over. All applications involving a new or extended basement should provide full hydrological and hydro geological statements along with a basement impact assessment which includes details of how the impact of construction will be minimised. There is a strong case for introducing a borough-wide Article 4 direction removing permitted development rights in this area.</p>
<p>DMP 15 Shop fronts and On-Street Dining</p>
<p>The content or subject matter is not controllable under the Advertisements Regulations. this criterion should be deleted from the policy.</p>
<p>The proposal to promote activity onto high streets through on-street dining is supported. It is also welcomed that the policy recognises that pavement seating should only be permitted where footways are sufficiently wide to allow for this. Whilst this should be assessed on a case by case basis, TfL recommends that a minimum clear width of two metres is retained for footways.</p>
<p>DMP 16 Advertisements</p>
<p>The proposal to consult TfL on advertisement applications adjacent to its road network is supported.</p>
<p>DMP 17: Parking and Transport Impacts</p>
<p>Recommended that updated parking standards are set out to ensure they are up to date. Including for disabled and electric vehicles.</p>
<p>Support for increasing cycle storage and reducing need for car parking.</p>
<p>Criticism that a cycle store should attract a planning application. Make it a minor operation. Discuss with DM.</p>
<p>Recommended minimum parking standards for theatres</p>

Make all paving permeable for parking in front gardens
Recommendation to add reducing air pollutants to aims
DMP 18: Managing Provision of Community Infrastructure
Recommends a no net loss approach to policing facilities.
Include emergency services in infrastructure list.
Add green infrastructure to the infrastructure list.
Amended definition of community facilities add cultural to leisure facilities in list of types of infrastructure.
Add green spaces to list of infrastructures
Add waste infrastructure to list of infrastructures
Reference recent Policing estates strategy.
Recommended no CIL charge for waste facilities, and that waste facilities should receive CIL funding.
DMP 19: Managing the quality of community facilities
Consider design guidance covering how good practice can be implemented on sports facilities developments
DMP 20: Jobs and employment
Rep received against requiring local labour when there may not be a supply of the appropriate skills.
Uncertainty regarding the mechanism for implementation of the policy.
Against S106 to secure jobs, not enough flexibility for developers.

Does not support restriction on trade in terms of labour supply. Or payment in lieu.
Recommends combining DM20 into DM1
DMP 21: Open Space
Policy needs to address how open space is going to be provided to meet demand from a new development.
Policy needs to set out the standards for open space (ie establish a clear link to the standards)
Supports land adjoining Open Space should enhance the Open Space and maintain the character of the Open Space.
Recommends that open space be assessed on a site by site basis including deficit areas.
Employment sites should not need to provide open space to overcome existing deficiencies.
Concern that developments in close proximity to open space are not unnecessarily restricted in size or operation.
Recommendation that the policy address unallocated open space?
DMP 22: Nature Conservation
NLWA supports biodiversity offsetting to enable developments in open space areas for key sites.
PWA would like to see a stronger wording on development on sites of nature conservation to will not be permitted from should be avoided.
Support for not want any weakening of policy on SINCs, proposes strengthened wording.
Would like to know how evidence of compensation of habitat impact is monitored.
Support for provision for new tree planting in developments.

DMP 23: Water Management & Flood Risk
Utilities such as waste water and sewerage should be included in policy
No sequential test for allocations

Appendix 3 – List of Contacts on the Council’s Consultation Database

Individual First Name	Individual Family Name
Lynne	Zilkha
Jasper	Woodcock
Heather	Wood
Kitty	Wong
John	Wise
Teresa	Wing
Carolyn	Whitehead
Edward	Webb
Julia	Warburton
Jonathan	Vellapah
Nick	Triviais
Max	Tomlinson
Joey	Toller
Jane	Thompson
Rachel	Tedesco

Councillor/MP Name
Clr Adamou Gina
Clr Adje Charles
Clr Ahmet Peray
Clr Akwasi-Ayisi Eugene
Clr Amin Kaushika
Clr Arthur Jason
Clr Basu Dhiren
Clr Beacham David
Clr Berryman Patrick
Clr Bevan John
Clr Blake Barbara
Clr Blake Mark
Clr Bull Clare
Clr Bull Gideon
Clr Carroll Vincent

Alison	Taylor-Smith
Elizabeth	Sutton-Klein
Henriette	Stuchtey
Celeste	Menich
Margaret	Stoves
Kevin	Stanfield
Michael	Edwards
Evelyn	Ryan
Tara	Ryan
Nicholas	Rusz
Joyce	Rosser
Jeff	Rollings
Chris	Roberts
Lorna	Reith
Barry	Rawlings
Kimberley	Pyper
Annabruna	Poli

Cllr Carter Clive
Cllr Christophides Joanna
Cllr Connor Pippa
Cllr Demirci Ali
Cllr Diakides Isidoros
Cllr Doron Natan
Cllr Ejiofor Joseph
Cllr Elliott Sarah
Cllr Engert Gail
Cllr Gallagher Tim
Cllr Goldberg Joe
Cllr Griffith Eddie
Cllr Gunes Makbule
Cllr Hare Bob
Cllr Hearn Kirsten
Cllr Ibrahim Emine
Cllr Jogee Adam

Karl-Dirk	Plutz
Richard	Perry
Andrew	Papadopoulos
Pavel	Pachovský
Christopher	Owen
Stephen	Overell
Gerrit	Ormel
Christian	Ogilvie-Browne
Juliet	Oerton
Carol	Norton
Joseph	Nicholas
Ollie.	Natelson
Jill	Naeem
Eleni	Murphy
Dave	Morris
Said	Moridi
Faye	Morgan
Mary	Mitchell

Cllr Kober Claire
Cllr Mallett Antonia
Cllr Mann Jennifer
Cllr Marshall Denise
Cllr McNamara Stuart
Cllr McShane Liz
Cllr Meehan George
Cllr Morris Liz
Cllr Morton Peter
Cllr Newton Martin
Cllr Opoku Felicia
Cllr Ozbek Ali Gul
Cllr Patterson James
Cllr Peacock Sheila
Cllr Reith Lorna
Cllr Rice Reg
Cllr Ross Viv
Cllr Ryan James

Simon	Miller
Chris	McNamara
Chris	McNamara
Louise	McNamara
Peter	McNamara
Richard	Max
Kim	Mason
Colin	Marr
Jason	MackKay
Stephen	Lubell
John	Long
Alison	Lister
Barry and Louise	Lewis
Rebecca	Lellis Ferreira
Ethan	Lazell
Charlie	Kronick
Heather	Kinnersley

Cllr Sahota Raj
Cllr Stennett Anne
Cllr Strickland Alan
Cllr Vanier Bernice
Cllr Waters Ann
Cllr Weston Elin
David Lammy MP
Lynne Featherstone MP

Company/Organisation
A Anva Ltd
A P T Consulting
A S Z Partners Ltd
A. E. Butler & Partners
A.C.H. Turkish Speaking Pensioners Club
Abbeyfield (North London) Society
Abbeyfield Society

Angie	Kikkides
Gabrielle	Kagan
Petal	Caddu
Francois	Joubert
Nick	Jenkins
Tony	Hopkins
Marian	Hone
Elaine & Ben	Holgado
Susie	Holden
Michael	Herbert
Frances	Heigham
Claudia	Hawkins
Lauritz	Hansen-Bay
Paul	Hancock
Laura and Marcus	Graham
Marcos	Godinho

ACHE (Action for Crouch End & Hornsey Environment)
Adult Literature Group
Adult Literature Group
Adult Literature Group
African Caribbean Association
African Cultural Voluntary Organisation
African Women's Welfare Group
Africans & Descendants Counselling Services Ltd
Age UK
Agudas Israel
AH Architects
Air Transport Users Council
Aitch Group
AJ Architects
Alan Cox Associates
Albany & Culross Close Residents Association

Joe	Friedman
Hannah	French
Elaine	Graham
Sean	Fewlass
Carla	Ferrarello
Pasco	Fearon
Cindy	Evans
Sue	Ettinger
Chris	Elser
Kieron	Edwards
Johnny	Dixon
Angharad	Davies
Felipe	Da Rocha
Ruth	Cowan
Stephen	Cook
Kenneth	Connelly

Alexander Elliot Ltd
Alexandra Mansions Tenants Association
Alexandra Palace Action Group
Alexandra Palace Residents Association
Alexandra Park/Grove Lodge Meadow Allotments
Alexandra Primary School
Alexandra Residents Association
Alexandra Tenants Association Group
Allenson House Medical Centre
Ally Pally Allotment Society
Al-Rasheed Dauda Architect
Altaras Architecture
Anatolitis Associates
Ancient Monuments Society
Andrew Kellock Architects

Anastasia	Christofis
David	Burrowes MP
Paul	Bumstead
Paul	Brown
Stephen	Brice
Jill	Bowden
Tim	Blake
Anna	Blackburn
Matthias	Bauss
Frances	Basham
Miles	Attenborough
James	Athanassiou
Ruth	Antoniades
Paulette	Amadi
Linda	Alliston
Andreas	Adamides
Leila	Sifri

Andrew Mulroy Architects Ltd
Anglo Asian Women's Association
Apcar Smith Planning
Arbours Association
Architectural Heritage Fund
Architectyourhome-Highgate
Archi-Tone Ltd
Archway Road Residents Association
Archway Road Tenants Association
Archway Road Tenants Association
ARHAG Housing Association
Arnold Road Residents Association
Arnos Grove Medical Centre
Arta Architectural
Ashdown Court Residents Association
Asian Carers Support Group
Asian Community Centre

Eliza	Kaczynska-Nay
Cynthia	Jenkins
Robert	Franks
Selina & Dan	Egerton
Tinu	Cornish
Lucia	Brusati
Tim	Brierley
Arthur	Leigh
Beatrice	Hyams
Valerie Rose	Berry
Bill	Temple-Pediani
Laura	Forrest-Hay
Sarah	Lane
Elizabeth	Gray
Nicola	Venning
Panos	Nicolaides
Poppy	Rose

Asian Community Group
Asian Family Group
Aspire Design & Survey Ltd
ASRA (GLHA)
Avenue Mews Tenants Association
Aztech Architecture Ltd
Bahai Community
Bangladesh Muslim Organisation
Bangladeshi Cultural Society
Bangladeshi Women's Association
Baptist Church
Barnet, Enfield and Haringey Health Authority
Bashkal & Associates
Bedford Road Tenants Association
Belcher Hall Associates
Bell Residents Association
Belmont Infant & Junior School

Christopher	Chadwick
Barry	James
Bob	Maltz
Flavio	Poli
Reuben	Payne
Hannah	Redler Hawes
John	Murray
Christine	King
Jon	Brooks
Chris	Warburton
David	Lichtenstein
Nick	Oparvar
Ruth	Ortiz
Ursula	Riniker
David	Baker
Michele	Eastmond

Bethel United Church of Jesus Christ
Bhagwati Sai Culture & Social Centre
Bibles Christian's Assembly
Bicknell Associates Chartered Architects
Blitzgold Ltd
Born Again Evangelistic
Bostall Architecture Services
Bounds Green & District Residents Association
Bounds Green Group Practice
Bounds Green Health Centre
Bounds Green Infant & Junior School
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch
Bowes Park Community Association
Bowes Park Community Association
Bracknell Close/Winkfield Road Residents Association
Brendan Woods Architects

Chris	Mayled
Jeremy	Munday
Nicholas	Embling
Andrew	Tiffney
Elizabeth	Barnett
Angela	Rossi Carter
Tony	Baker
Gordon	Forbes
Huub	Nieuwstadt
Bill	Nottage
Frederick	Limbaya
Feolezico	Calboli
Sue	Penny
J N	Douglas
David	Rennie

Bridge House Health Care Centre
Briffa Phillips Architects
Britannia Hindu Temple Trust
Broadwater Farm Community Centre
Broadwater Farm Community Health Centre
Broadwater Farm Residents Association
Broadwater Residents Association
Brown & Co (Surveyors) Ltd
Bruce Castle Village Residents Association
Brunswick Park Health Centre
Buckingham Lodge Residents Association
Building Design Consultants
CA (UK) Ltd
CAAC Highgate
CABE

Steve	Roe
Katy	Andrews
Sophie	Cattell

Statutory Consultee	
Greater London Authority	
LB Enfield	
LB Waltham Forest Spatial Planning	
London Borough of Barnet	
London Borough of Camden	
London Borough of Hackney	
London Borough of Islington	
Natural England	
Environment Agency	
English Heritage - London Region	
Highways Agency	
Departments for Communities and Local	

Campbell Court Residents Association
Campsbourne Baptist Church
Campsbourne Centre
Campsbourne Infant School
Calvary Church of God in Christ
Capital Architecture Ltd
Carolyn Squire
Carr Gomm Society
Carter Surveying Associates
Caryatid Architects
Casa de la Salud Hispano Americana CASAHA
CASCH
CASCH
Casch
CASE
Causeway Irish
CB Architects

Government	
Network Rail	
Haringey Fire Service	
London Ambulance Service	
NHS London	

Company / Organisation	
Corporation of London	
London Borough of Haringey	
London Borough of Sutton Planning and Transportation	
London Borough of Redbridge	
London Borough of Brent Planning Services	
London Borough of Barking & Dagenham	
London Borough of Barnet Planning Department	
London Borough of Bexley	

Cemex (UK) Operation Ltd
Central & Cecil
Centre for Accessible Environments
Charisma Baptist Church
Charlton House Medical Centre
Cherry Tree House Residents
Chestnut Area Residents Association (CARA)
Chestnut Northside Residents Association
Chestnuts Community Centre
Chinese Community Centre
Chomley & Causton Residents Association
Christ Apostolic Church Kingswell
Christ Church
Christchurch West Green

London Borough of Croydon	
London Borough of Enfield	
London Borough of Hammersmith and Fulham	
London Borough of Harrow	
London Borough of Hillingdon	
London Borough of Hounslow	
RB Kensington & Chelsea	
RB Kingston upon Thames	
London Borough of Lambeth	
London Borough of Lewisham	
London Borough of Merton	
London Borough of Newham	
London Borough of Richmond Upon Thames Policy and Design	
London Borough of Tower Hamlets Strategic Planning	
London Borough of Waltham Forest	
Westminster City Council Planning and City Development	

Christopher Wickham Associates
Church Commissioners
Church Crescent Residents Association
Circle 33 Home Ownership Ltd
Circle 33 Home Ownership Ltd
Circle 33 Housing Group
Clark Designs Ltd
Clarke Desai Ltd
Claudio Novello Architects
Client Design Services Ltd
Clyde Area Residents Association
Coldfall Community Centre
Coldfall Primary School
Coleraine Park Primary School
Collage Arts
Commerce Road Tenants Association

London Borough of Havering	
London Borough of Wandsworth	
London Borough of Ealing	
London Borough of Hackney	
City of London	
London Borough of Camden	
London Borough of Camden	
London Borough of Camden	

Name	
Alexandra Park Library	
Coombes Croft Library	
Highgate Library	
Hornsey Library	
Marcus Garvey Library	
Muswell Hill Library	
St. Ann's Library	

Community Action Sport
Community Church of God
Community Gay & Lesbian Association
Community Response Unit
Community Safety Unit
Confederation of British Industry
Co-op Homes
Coppetts Residents Association
Corporation of London
Council for British Archaeology
Crammond Browne Architects
Crawford Partnership
Crouch End open Space (CREOS)
CRH Tenants Association
Cromwell Avenue Residents Association
Crouch End Dental Practice
Crouch End Health Centre

Stroud Green Library	
Wood Green Central Library	
Reception	
Company/Organisation	
Albany & Culross Close Residents Association	
Alexandra Mansions Tenants Association	
Alexandra Palace Action Group	
Alexandra Palace Residents Association	
Alexandra Park/Grove Lodge Meadow Allotments	
Alexandra Residents Association	
Alexandra Residents Association	
Alexandra Tenants Association Group	
Archway Road Residents Association	
Archway Road Tenants Association	
Archway Road Tenants Association	
Arnold Road Residents Association	

Crouch End Health Centre
Crouch End Traders Association
Crouch End URC Church
Crouch Hall Road Surgery
Crowland Primary School
Cube Building Consultancy
CUE
CUFOS Community Centre
Cypriot Centre
Cypriot Women's League
Cyprus Turkey Democratic Association
D R M Associates
DASH
David Langan Architects
Dental Health Centre
Dental Practice
Dental Surgery

Ashdown Court Residents Association	
Avenue Mews Tenants Association	
Bedford Road Tenants Association	
Bell Residents Association	
Bounds Green Owner/Occupier Ass. & Neighbourhood Watch	
Bowes Park Community Association	
Bowes Park Community Association	
Bracknell Close/Winkfield Road Residents Association	
Broadwater Farm Residents Association	
Broadwater Residents Association	
Bruce Castle Village Residents Association	
Buckingham Lodge Residents Association	
Campbell Court Residents Association	
Cherry Tree House Residents	

Department for Culture Media and Sport
Department for Transport
Devonshire Hill Primary School
Direct Planning Ltd
Discount Plans Ltd
Downhills Infant & Junior School
DPA (London) Ltd
DPDS Consulting Group
Duckett Dental Surgery
Earlsmead Primary School
Eastbourne Ward Residents Association
Ebenezer Foundation Advisory Association
Ecodomus
Edgcott Grove Residents Association

Chestnut Area Residents Association (CARA)	
Chestnut Northside Residents Association	
Chomley & Causton Residents Association	
Church Crescent Residents Association	
Clyde Area Residents Association	
Commerce Road Tenants Association	
Coppetts Residents Association	
CRH Tenants Association	
Cromwell Avenue Residents Association	
Eastbourne Ward Residents Association	
Edgcott Grove Residents Association	
Ermine House Residents Association	
Ermine Road Residents Association	
Ferry Lane Estate Residents Association	
Fortismere Residents Association	
Garden Residents Association	

Eldon Road Baptist Church
EMJCC Community Side
ENKI Architectural Design
Eritrean Community in Haringey
Ermine House Residents Association
Ermine Road Residents Association
Evering Pentecostal Church
FA Drawing Service
Faith Baptist Church
Faith Mosque
Faith Restoration Ministry
Family Health Service Authority
Family/Landmark Housing Association
Federation of African Peoples Organisation
Ferry Lane Estate Residents Association
Finsbury Park Track & Gym

Garden Residents Association	
Grosvenor Road Residents Association	
Hale Estate Residents Association	
Harmony Close Residents Association	
Hillcrest Tenants & Residents Association	
Hillside Road Residents Group	
Hilltop House Residents Association	
Hornsey Lane/Colwick Close Residents Association	
HTBG Residents Association	
Jackson's Lane Residents Association	
James Place/Church Road Residents Association	
Kingsley Place Residents Association	
Lancaster Road Residents Association	
Lomond Close & Brunswick Road RA	
Lomond Close Residents Association	
Love Lane Residents Association	

Flower Michelin Ltd
Forestry Commission England
Fortismere Residents Association
Fortismere School
FQW
Frederick Knight Sports Ground
Freight Transport Association
Friends of Albert Road Recreation Ground
Friends of Bowes Park Garden
Friends of Bruce Castle
Friends of Bruce Castle
Friends of Brunswick Road Open Space
Friends of Cherry Tree Wood
Friends of Chestnut Park
Friends of Crouch End Open Space
Friends of Downhills Park

Millicent Fawcett Tenants Association	
Moselle Close Residents Association	
Muswell Colney Residents Association	
Nelson Mandela Residents Association	
Noel Park North Area Residents Association	
North Grove Residents Association	
Northumberland Park Tenants & Community Association	
Oakdale Resident Association / South Tottenham RA	
Palace Gates Residents Association	
Palace View Residents Association	
Park Lane Close Residents Association	
Partridge Way Residents Association	
Plevna Crescent Residents Association	
Remington Road Residents Association	
Resident Association	
Resident Association	

Friends of Downhills Park
Friends of Hornsey Church Tower
Friends of Ivatt Way
Friends of Lordship Rec
Friends of Markfield Recreation Ground
Friends of Muswell Hill Playing Fields
Friends of Muswell Hill Playing Fields & Coldfall Wood
Friends of Noel Park
Friends of Paignton Road
Friends of Queen's Wood
Friends of Railway Fields
Friends of Railway Fields
Friends of Stationer's Park
Friends of the Earth (London Region)
Friends of Tottenham Cemetery
Friends of Wood Green Common

Robert Burns Residents Association	
Seymour Road Residents Association	
Sophia House Residents Association	
South Hornsey Residents Association	
Southwood Lane Residents Association	
Springfield Avenue Residents Association	
Stokley Court Residents Association	
Stroud Green Residents Association	
Suffolk Road Residents' Association	
Summersby Road Residents Association	
The Chine & Cascade Residents Association	
The Weymarks Residents Association	
Tiverton Tewkesbury Residents Association	
Tower Gardens Residents Network	
Turner Avenue Residents Association	
Veryan Court Residents Association	
Wood Green Black Tenants Group	

G T Project Management
Gage Limited
Garden Drive Neighbourhood Watch
Garden Residents Association
Garden Residents Association
Gf Planning Limited
Gladesmore Community School
Gladesmore Girl's & Young Women's Club
Gladesmore Youth Club
Globe Projects Ltd
Goan Community Centre
Grace Baptist Chapel
Greek Community Care
Greek Orthodox Church
Greek Parents Association
Green City Landscapes Ltd
Greig City Academy

Wood Green Central Area Tenants & Community Assoc.	
Woodridings Court Residents Association	
Woodside Residents Association	
The Queens Mansions Residents Association	
Avenue Gardens Residents Association	
Avenue Gardens Residents Association	
Beresford Road Residents Association	
Burghley Road Residents Association	
Chestnuts Northsid Residents Assn	
Chitts Hill Residents Association	
Glasslyn, Montenotte Tivoli Road Residents Assoc.	
HFRA (Haringey Federation of Residents Association)	
Morrish Residents Association	
Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park	

Gridline Architecture
Grosvenor Road Residents Association
Groundwork London
Gus Alexander Architects
Guyana People's Congress
Habinteg Housing Association
Haines Philip Architects
Hale Estate Residents Association
Hamilton Bishop Ltd.
Hancock Architects
Haringey African Organisation
Haringey Area Youth Project
Haringey Arts Council
Haringey Asian Women Aid

Parkside & Malvern Residents Association	
Parkside Malvern Residents Association	
Rookfield Estate Residents Association	
Sandlings Residents Association	
The Alexandra Residents Association	
Warner Estate Residents Association	
West Green Residents' Association	
West Green Residents' Association	
Woodlands Park Residents Association	
Woodstock Road Residents Association	
Cranley Gardens Residents' Association	
Wood Lane Residents Association	
Gardens Residents Association (GRA)	
Grovelands, Lemsford & Leabank Residents Assoc.	
Torrington Park Residents Association	
Tynemouth Area Residents' Association	

Haringey Autism
Haringey Breastfeeding Centre
Haringey Community Volunteer
Haringey Deaf Group
Haringey Faith Forum
Haringey Ghanaian Community
Haringey Group London Wildlife Trust
Haringey Irish Cultural & Community Centre
Haringey Leaseholders Association
Haringey Mencap
Haringey Pakistan Cultural Society
Haringey Phoenix Group
Haringey Police
Haringey Solidarity Group
Haringey Sports Council
Haringey United Church

Friern Village Residents' Association	
The Bounds Green and District Residents Association	
Dowset Road Residents Association.	
Haselmere Residents Association	
Haselmere Residents Association	
Haringey Federation of Residents Associations	
Palace Gates Residents' Association	
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	
Crouch End Forum	
Fountayne Residents Association	

Company/Organisation	
Office of Government Commerce	
Cornerstone Trading	
Barratt Development PLC	
Inland Waterways Association	

Haringey Women's Aid
Harmony Close Residents Association
HART Architecture
Hartleys Projects Ltd
Health and Safety Executive
High Cross Church
High Cross United Reformed Church
Highgate Group Practice
Highgate Library Action Group
Highgate Newton Community Centre
Highgate Primary School
Highgate United Synagogue
Highgate Wood School
Highpoint Dental Surgery
Highway Youth Club
Hill Homes

LB Greenwich	
Metropolitan Development Service	
London TravelWatch	
St. Peter in Chains RC Infant School	
Aarogya Medical Centre	
London Ambulance Service	
3 Valleys	
African Caribbean Leadership Council	
Alexandra Palace & Park CAAC	
Alexandra Palace Charitable Trust	
Al-Hijra Somali Community Association	
Alliance Planning	
Angolan Community Association	
Arriva London	
Asian Action Group	
Asian Women's Association	

Hillcrest Tenants & Residents Association
Hillside Road Residents Group
Hilltop House Residents Association
Hollickwood Park Campaign
Holly Park Clinic
Holmes Design Ltd
Holmesdale Road & Orchard Road Neighbourhood Watch
Holy Innocents
Holy Trinity Church
Home Craft Consultant
Homebase Ltd
Homebound Social & Luncheon Group
Homes & Community Agency
Hornsey Dental Practice
Hornsey Housing Trust
Hornsey Housing Trust

Avenue Gardens Residents Association	
Avenue Gardens Residents Association	
Barnard Hill Association	
Barton Willmore	
Barton Willmore	
Bellway Homes	
Beresford Road Residents Association	
Black & Ethnic Minority Carers Support Service	
BME Community Services - Selby Centre	
BPTW	
British Waterways	
Canal River Trust Head Office	
Bruce Grove Primary School	
Burghley Road Residents Association	
Buying Solutions	
CARA Irish Housing Association	
CB RE	

Hornsey Lane & Colwick Close RA
Hornsey Lane Association
Hornsey Lane/Colwick Close Residents Association
Hornsey Moravian Church
Hornsey Mosque
Hornsey Police Station
Hornsey School for Girls
Hornsey YMCA
Housing 21
HPN Ltd
HTBG Residents Association
IBI Design Associates
Industrial Dwellings Society
Innisfree Housing Association
Irish Community Centre
Irish in Britain Representation Group
Islamic Community Centre

CGMS Consulting	
CGMS Consulting	
CGMS Consulting	
CgMS Ltd	
CGMS Ltd	
Chestnuts Northsid Residents Assn	
Chettle Court Ranger Youth (FC)	
Cheverim Youth Organisation	
Chitts Hill Residents Association	
Alderton Associates	
Christian Action (Enfield) Housing Association	
Christian Action (Enfield) Housing Association	
City Planning Group	
Civil Engineers Ltd	
Cluttons LLP	
College of Haringey, Enfield and North East London	

Islamic Community Centre Women's Group
JA Architecture
Jack Cruickshank Architects
Jacksons Lane Community Centre
Jackson's Lane Residents Association
James Place/Church Road Residents Association
Jason Read Pugh
Jesus for the Word Community Project
Jewish Orthodox Association
John Grooms Housing Association
John L Sims Surveyor
John Perrin & Co
JS Surveying And Design
Julian Cowie Architects
Kings Avenue Dental Practice
Kingsley Place Residents Association

Colney Hatch Management Company Ltd.	
Connexions	
Council of Asian People (Haringey)	
Crossover Group	
Cypriot Elderly & Disabled Group	
Department for Business, Innovation and Skills	
Alexandra Park School	
Department of Environment Food and Rural Affairs	
Derek Horne & Associates	
Dialogue Communicating Planning	
DP9 Planning Consultants	
Drivers Jonas Deloitte	
The Old Surgery	
Ethiopian Community Centre	
Euroart Studios	
Family Mosaic	

Kurdish Advice Centre
Kurdish Community Centre
Kurdish Housing Association
Kush Housing Association
L & P Consultants
Ladybur Housing Co-operativr
Lancaster Road Residents Association
LB Barking & Dagenham
LB Brent
LB Croydon
LB Ealing
LB Hammersmith & Fulham
LB Harrow
LB Havering
LB Kensington & Chelsea
LB Lambeth

Fields in Trust	
First Plus Planning	
FirstPlan	
Friends of Priory Park	
Friends of Priory Park	
Muswell Hill and Hornsey Friends of the Earth	
Friends of the Earth Tottenham & Wood Green	
Friends, Families and Travellers and Traveller Law Reform Project	
Fusion Online Limited	
Genesis Housing Group	
Glasslyn, Montenotte Tivoli Road Residents Assoc.	
GLC-RAG	
Grace Organisations - Elderly Care Centre	
Greek Cypriot Women's Organisation	
GreenN8 Community Group	
Gt. Lakes Initiative & Support Project	

LB Merton
LB Newham
LB Richmond Upon Thames
LB Sutton
LB Tower Hamlets
LB Wandsworth
Lea Valley Primary School
League of Jewish Women
LETEC
Levvel Ltd
Liberty Church
Lidl UK
Lipton Plant Architects
Living World Temple
Livingstone Youth & Parent Support Centre
Lomond Close & Brunswick Road RA

Haringey Chinese Centre	
Haringey Cycling Campaign	
Haringey Fire Service	
Haringey Peace Alliance	
Haringey Play Association	
Haringey Racial Equality Council	
Haringey Somali Community & Cultural Association	
Haringey Womens Forum	
HAVCO	
Her Majesty's Court Service	
HFRA (Haringey Federation of Residents Association)	
Home Builders Federation - London	
Home Office	
Home-Start Haringey	
Hornsey CAAC	
Hornsey Historical Society	

Lomond Close Residents Association
London Ambulance Service
London Basement Company Ltd
London Bat Group
London City Airport
London Forum of Amenity & Civic Societies
London Historic Parks & Gardens Trust
London Housing Federation
London Islamic Cultural Society
London Islamic Cultural Society
London Port Health Authority
London Walking Forum
London Waste Ltd
London Wildlife Trust
London Windows Direct Ltd
Lord Morrison Community Centre

Hornsey Vale Community Association	
Hornsey Vale Community Association	
Jala - Johnathan A Law and Associates	
Jamait-Al-Nissa	
Joint CAAC	
Jones Lang LaSalle Planning	
King Sturge Llp	
Knight Frank	
Ladder Community Safety Partnership	
Lambert Smith Hampton	
LB Bexley	
LB Redbridge	
Lee Valley Estates	
Lee valley Park Authority	
London Continental Railway	
Dron & Wright	
London First	

Lordship Lane Infant School
Lordship Lane Junior School
Loren Design Ltd
Love Lane Residents Association
M C Dentistry
Manor House Dental Practice
Marianne Davys Architects Ltd
Mario Pilla Architects
Markfield Project
MD Designs
Metropolitan Development Consultancy
Metropolitan Home Ownership
Metropolitan Police
Metropolitan Police Service
Middle Lane Methodist Church
Middlesex Area Probation Service
Millennium Neighbourhood Watch & Residents Association

Metropolitan Housing Trust	
Metropolitan Police	
Metropolitan Police	
Methodist Church	
Ministry of Justice	
Morrish Residents Association	
Mount Anvil plc	
Mulalley and Company Ltd	
Nathaniel Lichfields and Partners	
National Federation of Gypsy Liaison Groups	
AMEC for National Grid	
National Market Traders' Federation	
New Testament Church of God	
NHS London Healthy Urban Development Unit	
Noel Park CAAC	
Tottenham CAAC	

Millicent Fawcett Tenants Association
Millyard 7th day Baptist Church
Ministry of Praise
Missionaries of Africa
MJW
Moravian Church
More Space
Morris House Dental Surgery
Morris House Surgery
Moselle Close Residents Association
Mountview Arts Centre
Mt. Olivet Baptist Church
Murray Graham Architecture Ltd
Murray Mackeson Associates
Muswell Colney Residents Association
Muswell Hill & Fortis Green Association

Noel Park North Area Residents Association/Noel Park Conservation Area Advisory Committee/Friends of Noel Park	
North London Business	
North London Chamber of Commerce	
North London Partnership Consortium	
North London Waste Authority	
North London Waste Authority	
North Middlesex Hospital	
Caldotec Ltd	
Campsbourne School	
Parkside & Malvern Residents Association	
Parkside Malvern Residents Association	
Peacock & Smith for WM Morrison Supermarkets plc	
Peacock and Smith	
PEEC Family Centre	
Planning Perspectives	

Muswell Hill & Highgate Handicapped Pensioners Club
Muswell Hill & Highgate Pensioners Action Group
Muswell Hill & Highgate Pensioners Action Group
Muswell Hill Police Station
Muswell Hill Synagogue
Muswell Hill Youth Project
N London Cultural Diversity Group
N.A.G.
National Romany Rights Association
Neelkamal Asian Cultural Centre
Neil Wilson Architects
Nelson Mandela Residents Association
New Deal for Communities
New Image Design
New River Action Group

Pollard Thomas & Edwards Architects	
PTEA	
Rapleys	
Rapleys	
Redrow Homes (Eastern) Ltd	
Restoration Community Project	
Rookfield Estate Residents Association	
RPS Planning	
Sandlings Residents Association	
Savills	
Savills	
Savills	
Savills	
Savills Planning	
Savills	

New River Sports Centre
New Space
New Stroud Green Health Centre
Newton Architecture
NHS London
Nightingale Primary School
Noel Park Infant & Junior School
Noel Park North Area Residents Association
Noel Park Over 55's Club
North Grove Residents Association
North Harringay Infant & Junior School
North London West Indian Association
Northumberland Park Community School
Northumberland Park Tenants & Community Association
Northumberland Park Women's &

Selby Trust	
Shian Housing Association Ltd	
St. James Church	
St. Mary's Church	
Stapleton Hall Ltd	
Stewart Ross Association/Dev Plan	
Stock Woolstencroft	
Stonewall	
Sustrans	
Tan Dental Practice	
Tetlow King Planning	
Thames Water Utilities Ltd	
Thames Water Wastewater Services	
The Alexandra Residents Association	
Haringey Council	
The Mulberry Primary School	

Childrens Centre
npower
Oakdale Resident Association / South Tottenham RA
Okpanam Women's Association
Oromo Community in Haringey
Osel Architecture
Outline Building Limited
P R P Architects
P. E. Ottery
P.D. Associates
Palace Gardens Association
Palace Gates Residents Association
Palace View Residents Association
Park Lane Close Residents Association
Park Road Dental Practice
Park Road Pool
Park View Academy

The Planning Inspectorate	
The Ramblers	
The Theatres Trust	
<u>Sustrans</u>	
Tiverton Primary School	
Tottenham CAAC	
Tottenham Civic Society + Tottenham CAAC	
Transport For London	
Tree Trust for Haringey	
Triangle Community Centre	
Turley Associates	
Campaign to Protect Rural England (CPRE)	
Turnaround Publisher Services	
Turnaround Publisher Services	
Unite Group PLC	
Veolia Environmental Services (UK) Plc	
Wards Corner Community Coalition	

My Dental Care
Park Vue Dental Practice
Parsons Brinckerhoff Ltd
Partridge Way Residents Association
Pathmeads
Patrick Hickey Design
Paul Archer Design
Paul Buxton Associates
Peabody Design Group
Peabody Trust
Peabody Trust
People's Christian Fellowship
Perfect Fit Kitchen & Interiors Ltd
Peter Brades Architects
Phoenix Group
Plevna Crescent Residents Association
Police & Community Working Group

Wards Corner Community Development Group	
Warner Estate Residents Association	
Haringey Citizen's Advice Bureau	
West Green Residents' Association	
West Green Residents' Association	
Woodlands Park Residents Association	
Haringey Trades Council	
Woodstock Road Residents Association	
Workspace Group	
YMCA	
Cabinda Community Association	
Veolia Water Partnership	
London Parks and Gardens Trust	
Pinkham Way Alliance	
Thames Water	
Freehold Community Association	
Natural England	

Port of London Authority
Post Office
Post Office Counters Ltd
Powergen plc
Pride of Ferry Lane
Propel Projects
Protect Bruce Castle Area (PBCA)
Pyramid Counselling Services
Quorum Associates
Randall Shaw Billingham
Redemption Church of God
Remington Road Residents Association
Rennie & Partners
Resident Association
Resident Association
Rhodes Avenue Primary School
Richard S McCarthy Architect

Consultation Service	
Office of the Green MEPs,	
Member of Parliament for Chipping Barnet	
Planner	
One Housing Group	
One Housing Group	
Hyde Housing	
Viridian Housing	
Viridian Housing	
Tamil Community Housing Association Ltd	
London & Quadrant	
London & Quadrant	
London & Quadrant	
London and Quadrant	
British Waterways Board (London Office)	
Friends of Parkland Walk	

Rie Nijo Architecture
Risley Avenue Infant & Junior School
Robert Burns Residents Association
Robert Harrison Property
Rolfe Judd Planning Ltd
Royal Mail Property Holdings
Royal Society for the Protection of Birds
Rutland House Surgery
Saheli Asian Girls & Young Womens Group
Sakumoh Dance Group
Sanctuary Housing Association
Sanctuary Youth Club
Save Britain's Heritage
Save the Environment of Park & Palace (STEPP)
Savills Plc

Friends of Woodside Park	
The Highgate Society	
LB Southwark	
Lee Valley Regional Park Authority	
Martineau	
Milmead Industrial Management Ltd.	
Mobile Operators Association	
Muswell Hill CAAC	
Planning Potential	
Shire Consulting	
Sunlight Lofts Ltd	
Haringey Allotments Forum	
Montagu Evans	
Newlon Housing Trust	
Newlon Housing Trust	
CG Architects	

Scenario Architecture
Schamroth + Harriss Architects
Servite Houses
Seven Sisters Infant & Junior School
Seventh Day Adventist Church
Seymour Road Residents Association
SGI Sokagakkia
Sierra Leone Community Empowerment Project
Sierra Leone Family Welfare Association
Sigma Design Build UK
Simon Bocking Building Services
Simon Levy Associates
Society for the Protection of Ancient Buildings (SPAB)
Solon Housing Co-operative Housing Services
Somali Community Group
Somali Welfare Association

Tottenham Police Station	
Methodist Homes	
Network Housing	
Network Housing	
Arhag HA	
Lee Valley Estates	
Lee Valley Estates	
Innisfree HA	
Karin Housing Association	
Karin Housing Association	
Circle Housing Group	
Circle Housing Group	
Highgate CAAC	
Highgate CAAC	
Highgate CAAC	

Somerset Gardens Family Health Care
Sophia House Residents Association
South Harringay Infant School
South Harringay Junior School
South Hornsey Residents Association
Southwood Lane Residents Association
Spenser Associates
Sport England London Region
Sporting & Education Solution
Springfield Avenue Residents Association
St, Paul's and All Hallows CE Junior School
St. Andrews Vicarage
St. Ann's Primary School
St. Anns Church
St. Benet Fink

Apna Ghar Housing Association	
Carr-Gomm	
Circle 33 Housing Trust	
Community HT (One HG)	
Grainger PLC	
Guinness Trust	
Habinteg Housing Association Ltd	
Hornsey Housing Trust	
Housing 21	
Islington and Shoreditch HA	
Lien Viet Housing Association	
Logic Homes Ltd	
North London Business	
North London Sub-Region	
Notting Hill Housing Association	
Nottinghill Housing Group	
Origin Housing	

St. Cuthbert's Church
St. Francis de Sales RC Infant & Junior School
St. Gildas' RC Junior School
St. Ignatius RC Primary School
St. James CE Primary School
St. James Dental Surgery
St. John the Baptist Greek Church
St. John Vianney Church
St. John's
St. Marks Methodist Church
St. Marks Methodist Church
St. Mary Community Centre
St. Mary's CE Infant School
St. Mary's CE Junior School
St. Mary's Greek Orthodox Cathedral
St. Mary's RC Infant & Junior School
St. Michael's CE Primary School

Origin Housing	
Origin Housing Group	
Pocket	
Pocket	
Pocket Living	
Sahil HA	
Sahil Housing	
Sanctuary Group	
Sanctuary Housing	
Shian Housing Association	
Southgate Churches & Wood Green	
St Mungo	
Teachers Housing Association	
The Abbeyfield Society	
Pinkham Way Alliance	
Muswell Hill Sustainability Group	
S. Mary's Vicarage	

St. Paul the Apostle
St. Paul's
St. Paul's and All Hallows CE Infant School
St. Paul's Church
St. Peter Le Poer
St. Thomas More School
St. Vincent Social & Economic Association
Stagecoach - SELKENT
Stamford Hill Primary School
Stationers Community Centre
Staunton Group Practice
Stephen Donald Architects
Stokley Court Residents Association
Stroud Green Baptist Church
Stroud Green Housing Co-operative
Stroud Green Residents Association
STS Structural Engineering

Networked Neighbourhoods	
Cranley Gardens Residents' Association	
The Hawthorns RA and Neighbourhood Watch	
Haringey Forum for Older People	
Woodside High School	
LB Lewisham	
Barker Parry Town Planning Ltd	
Lancasterian Primary School	
Exposure Organisation	
Open Door	
Open Door	
Open Door	
Space Design Consultants Ltd	
LB Bromley	
St. Martin of Porres RC Primary School	
Turkish Cypriot Community Association	

Stuart Crescent Health Centre
Stuart Henley & Partners
Studio 11 Design Ltd
Studio 136 Architects
Suffolk Road Residents' Association
Summersby Road Residents Association
Sunshine Garden Centre
Sure Youth Foundation Project
Symon Smith & Partners
T.B.F.H.A
Tasou Associates
Temple of Refuge
Templeton Associates
Tenants Association
Tetherdown Primary School
Thames Gateway London Partnership

Iceni Projects Limited	
Mind In Haringey	
Pellings Llp	
Oliver Burstons Architects	
Highgate URC Church	
Earlham Primary School	
John Rowe-Parr Architects	
The Garden History Society	
Westminster City Council	
Wood Lane Residents Association	
Gardens Residents Association (GRA)	
Royal Borough of Kingston upon Thames	
St. John the Baptist Greek Church	
Grovelands, Lemsford & Leabank Residents Assoc.	
Muswell Hill Primary School	
Family Mediation Service	

The Alexandra Surgery
The Bowes Road Dental Practice
The Chine & Cascade Residents Association
The Christchurch Hall Surgery
The Clock Tower Practice
The Gainsborough Clinic
The Georgian Group
The Green CE Primary School
The Gypsy Council
8 Stuart Crescent Health Centre,
The John Loughborough School
The North London Gay & Lesbian Association
The Surgery
The Surgery
The Surgery
The Surgery

Sovereign Group Ltd	
St. Francis de Sales	
Leads Design Partnership	
St. Aidan's VC Primary School	
Keeping it Simple Training (KIS) Ltd	
Home Group	
The Parish of Wood Green	
Ferry Lane Primary School	
St. John Vianney School	
Action for Kids Charitable Trust	
Muswell Hill Centre	
Coleridge Primary School	
Stroud Green Primary School	
Barnet, Enfield and Haringey Mental Health Trust	
Our Lady of Muswell Hill Primary School	
Torrington Park Residents Association	
The Willow Primary School	

Spur Road Surgery
The Surgery
The Surgery
St John's Road Surgery
The Surgery
The Surgery
The Surgery
The Surgery
Myddleton Road Surgery
The Surgery
The Surgery
The Surgery
The Surgery
The Surgery
The Surgery
The Surgery
The Surgery
The Tree Council

Millennium Dental Practice	
St. Paul's Catholic Primary School	
Rokesly Junior School	
Tynemouth Area Residents' Association	
Papa Architects Ltd	
Friern Village Residents' Association	
Enfield, Haringey and Barnet Samaritans	
Dixon Searle LLP	
Mario Pilla Architects Ltd	
LB Merton	
LB Merton	
The Bounds Green and District Residents Association	
Rapleys LLP	
Savills,	
Mario Pilla Architects Ltd	

The Tree Trust for Haringey
The United Reformed Church
The Victorian Society
The Weymarks Residents Association
Affinity Water Limited
Tibbalds TM2
Tiverton Tewkesbury Residents Association
Tomlinson Tree Surgeons
Tottenham & Wood Green Pensioners Group
Tottenham Baptist Church
Tottenham Community Sports Centre
Tottenham Green Sports Centre
Tottenham Green Taskforce
Tottenham Irish Women's Group
Tottenham Peoples Initiative

Planning Bureau - McCarthy and Stone	
Dowset Road Residents Association.	
Bridge Renewal Trust	
Winbourne Martin French (chartered surveyors).	
Muswell Hill & Fortis Green CAAC	
Transition Crouch End	
Hornsey Historical Society member.	
MHFGA	
CgMs Consulting	
London borough of Enfield	
London Borough of Enfield	
Collins & Coward	
Hornsey Historical Society member	
A2 Dominion Group	
The Highgate Society	
Greater London Authority	
Urban Vision Partnership Limited	

Tottenham Police Station
Tottenham Traders Association
Tottenham Trust
Tottenham Women's Aid
Tower Gardens CAAC
Tower Gardens Residents Network
Town & Country Planning Limited
Trafalgar Christian Centre
Transco
Trinity at Bowes Methodist Church
Turkish Cypriot Counselling Group
Turkish Cypriot Elderly Group
Turkish Cypriot Forum
Turkish Cypriot Peace Movement in Britain
Turkish Cypriot Women's Project
Turkish Parents Association
Turkish Youth Association

Regulatory Services	
Planware Ltd	
Mayor's Office for Policing and Crime	
Haringey Young Carers Project	
We Love Myddleton Road	
Architectural Heritage Fund	
Smith Jenkins Town Planning Consultants	
Level Ltd	
SSA Planning Ltd	
London Gypsy and Traveller Unit	
Met Police – Safer Transport Team - Haringey	
Met Police – Safer Transport Team - Haringey	
DSO Edmonton London Ambulance Service	
London Ambulance Service	
Arriva	
Metroline	

Turner Avenue Residents Association
Turnpike Lane Citizens Advice Bureau
Twentieth Century Society
TWG FoE/FoE London
Tynemouth Medical Practice
Uganda Welfare Association
Umfreville Road Neighbourhood Watch
Unit One Architects
United Apostolic Faith Church
Universal Church of the Kingdom of God
Urban Futures London Ltd
Urban Homes Ltd
Van Rooyen Design
Veryan Court Residents Association
Victim Support Haringey

First Capital Connect	
First Capital Connect	
TfL	
TfL	
TfL	
TfL	
TfL London Rail	
LOROL	
Metroline	
Abellio	
Go Ahead	
Greater Anglia	
Haselmere Residents Association	
Haselmere Residents Association	
London Travel Watch - Chair of Consumer Affairs	
London Travel Watch	

Visit London
Vivendi Architects LLP
Voluntary Action Haringey
W. A. Shersby
Warham Road Neighbourhood Watch
Charalambous Architectural Consultant
Welbourne Primary School
West Green Neighbourhood Watch
West Green Primary School
West Green Regeneration Group
Westbury Dental Practice
Westbury Medical Centre
Weston Park Primary School
White Young Green Planning
Whitehall Community Centre
Willoughby Road Methodist Church

Haringey Cycling Campaign	
Age UK	
Mobility Forum/ Age Concern Haringey	
Haringey Disability First Consortium (Access & Transport sub-group)	
Haringey Disability First Consortium	
Haringey Disability First Consortium	
Haringey Federation of Residents Associations	
Palace Gates Residents' Association	
Highgate Neighbourhood Forum	
Sustainable Haringey/ Muswell Hill and Fortis Green Association	
Sustainable Haringey Transport Group	
Barking-Gospel Oak line users group	
Haringey Living Streets/ Clyde Area Residents' Association/ Tottenham and Wood Green Friends of the Earth	
HAVCO	
London at BT Group and Chair, Haringey	

Wilson & Bell
Winkfield Road Community Centre
Wise thoughts - gaywise
Women & Medical Practice
Wood Green Area Youth Project
Wood Green Black Tenants Group
Wood Green Central Area Tenants & Community Assoc.
Wood Green Community Link
Wood Green Dental Practice
Wood Green Police Station
Wood Green Regeneration
The Archdeacon of Hampstead
Wood Green Youth Club
Woodberry Down Baptist Church
Woodlands Park Infant & Junior

Business Board	
Hackney Community Transport Group	
Living Under One Sun	
Boyer Planning London	
Berkeley Homes (North East London) Ltd	
Crouch End Forum	
Fairview New Homes	
Amec Foster Wheeler on behalf of National Grid	
NHS Property Services Ltd	
Fairview	
Persimmon	
Persimmon	
Persimmon	
DP9 Planning Consultants	
Chartered Landscape Architect	
Fountayne Residents Association	

School
Woodridings Court Residents Association
Woodside Residents Association
Xeva Design Concepts
Yabsley Stevens Architects
Young Lesbian Group
Youth One Stop Shop
Youth Theatre Project
Zatkhon Construction Co. Ltd.
The Queens Mansions Residents Association
Ladder Community Safety Partnership
Department for Education
Chris Thomas Ltd
Haringey NHS
Haringey Teaching Primary Care Trust
Whittington Hospital Trust

Appendix 4 – Individual Comments Received and the Council’s Response

Consultee	Policy	Summary	Council Response
Axis for FCC Skanska	DMP 1	With regard to infrastructure we note that certain waste management uses fall within B Class Uses, but others are Sui Generis. Thus the policy should provide for B Class Uses (B1, B2 and B8) and Sui Generis uses similar in nature/character. The policy should be rigorous in terms of criteria for releasing employment land for other uses, otherwise the authority will face numerous applications for higher value land uses (i.e. residential) on land allocated to meet the authorities economic needs.	An Employment Land Review has identified the needs regarding employment land, and this has been reflected in Policy DM48, DM49, DM52, which have rigorous criteria for releasing employment land
Axis for FCC Skanska	DMP 10	The requirement for new development to achieve a reduction in predicted carbon dioxide emissions of 20% from on-site renewable energy generation (where viable) is an important target. However, the viability aspect of this target should be retained through the drafting stages of this policy as in some cases the requirement may make development undeliverable.	Policy DM28 presents options, or Allowable Solutions for situations where it is not possible to meet required CO2 reductions on-site.
Axis for FCC Skanska	DMP 10	The policy should also not restrict the carbon reduction benefits to simply the use of saving methods. Renewable energy due to the fact carbon benefits / carbon reduction can be achieved in other ways. For example recycling facilities can provide very significant carbon benefits through the recovery of natural resources that would otherwise be disposed of. As a consequence, the policy should be broadened to encompass a range of carbon saving methods.	Policy DM28 presents options, or Allowable Solutions for situations where it is not possible to meet required CO2 reductions on-site.
Axis for FCC Skanska	DMP 12	The general policy objective of environmental protection is supported. However, the proposals to meet the policy aim are flawed. Firstly, Environmental Impact Assessment can only be required if a development meets the relevant criteria in the Regulations, not as suggested if there is considered to be a significant impact. Secondly, the policy needs to actually have a purpose i.e. that planning could or would be approved or refused etc. As drafted it merely requires assessment. It is also noted that the policy should contain criteria which permits development that may give rise to significant environmental effects if the wider benefits of the scheme (i.e. environmental, economic or social) outweigh the	This area of policy has been replaced by a range of more detailed policies which have clear development management guidance and criteria. These policies include DM25, DM26, DM27, DM28, DM29, DM30, DM31, DM32, DM33, DM34,

Consultee	Policy	Summary	Council Response
		harm that would be caused.	DM35.
Axis for FCC Skanska	DMP 18 and 19	Adopted Core Strategy Policy SP16 'Community Facilities' identifies that the Council will work with its partners to ensure that appropriate improvement and enhancements, and where possible, protection of community facilities and services are provided for Haringey's communities. Policy SP16 covers a range of infrastructure elements and includes facilities for managing waste. Neither DMP18 nor DMP19 include waste infrastructure within their lists of infrastructure. For consistency with SP16 waste facilities should be added.	Policy DM11 has been added to incorporate guidance on waste facilities, the North London Waste Plan will provide further guidance for waste facilities
Axis for FCC Skanska	DMP 21	Requirement for development outside of but adjacent to Green Belt, Metropolitan Open Land and Significant Local Open Land or other 'valuable' land to maintain or enhance the visual character of the open land itself is not in line with national policy (i.e. the National Planning Policy Framework) and is unlikely to be realistically achievable in an urban area such as North London.	Detailed design policies establish the principles of design required in the borough, including policies DM1, DM2, Dm3, DM5 and DM6. These policies are consistent with the NPPF's chapter 7 "Requiring good design".
Axis for FCC Skanska	DMP 21	The policy aim should be changed to ensure that development adjacent to the various types of open land does not result in any unacceptable adverse effects upon its value / visual character as opposed to requiring it to maintain or enhance the value /character.	Detailed design policies establish the principles of design required in the borough, including policies DM1, DM2, Dm3, DM5 and DM6. These policies are consistent with the NPPF's chapter 7 "Requiring

Consultee	Policy	Summary	Council Response
			good design".
Axis for FCC Skanska	DMP 22	This policy appears to be confused as it deals with nature conservation, open space, design, health, flooding, ancient woodland and cultural heritage under the heading of nature conservation. Furthermore there is insufficient detail to understand what the policy criteria / tests will be. It is suggested that the aforementioned topics are divided into separate policies each with their own clear objectives and tests. In addition, the reference in the supporting text to the need for the ecological impact assessment to be carried out throughout the year in order to enable a full survey of flora and fauna should be amended due to the fact there are specific survey timeframe windows depending on ecological resource.	This area of policy has been replaced by a range of more detailed policies which have clear development management guidance and criteria. These policies include DM25, DM26, DM27, DM28, DM29, DM30, DM31, DM32, DM33, DM34, DM35.
Axis for FCC Skanska	DMP 23 and App 1	In accordance with the National Planning Policy Framework, it should be noted that there is no requirement to undertake a sequential test for any site that is allocated in an adopted development plan.	This is noted
Axis for FCC Skanska	DMP 9	The 'policy' objective appears very unclear. It clearly covers recycling demolition waste which we support, but then talks about a policy dealing with climate change and energy, which we see as an entirely different subject. Finally the supporting text then makes reference to the North London Waste Plan...We see the three matters of: 1. Dealing with construction and demolition waste; 2. Addressing climate change and energy; and 3. Meeting the land requirements of the North London Waste Plan. As entirely discrete issues that each need to be considered separately. It is recommended that bespoke policies be developed for each.	This area of policy has been replaced by a range of more detailed policies which have clear development management guidance and criteria. These policies include DM25, DM26, DM27, DM28, DM29, DM30, DM31, DM32, DM33, DM34, DM35.

Consultee	Policy	Summary	Council Response
Axis for FCC Skanska	DMP 9	With regard to the North London Waste Plan, we fully support the London Borough of Haringey making appropriate provision and recommend that the development management policies support the safeguarding of existing waste management sites and those allocated in the emerging North London Waste Plan.	Existing sites have been safeguarded in the Site Allocations DPD and will be safeguarded in the North London Waste Plan.
Barton Wilmore	DMP 1	We welcome the inclusion of policy wording that provides for the release of sites from employment use. Where it is demonstrated that a site is unviable as employment land, LBH should seek appropriate development on the site that maximises the amount of employment space retained. If the site has been found to be unviable for employment purposes, to require the re-provision of employment space could put an undue burden on the developer with the risk that they are left with vacant units owing to the lack of demand or a planning permission that cannot be implemented resulting in a vacant or underused site.	An Employment Land Review has identified the needs regarding employment land, and this has been reflected in Policy DM48, DM49, DM52, which have rigorous criteria for releasing employment land
Barton Wilmore	DMP 1	To provide flexibility and accord with the above NPPF, the emerging policy should state that LBH will seek mixed use development with a mix of uses appropriate to the site, site setting and in response to local need and market demand.	An Employment Land Review has identified the needs regarding employment land, and this has been reflected in Policy DM48, DM49, DM52, which have rigorous criteria for releasing employment land
Barton Wilmore	DMP 1	The emerging London Industrial Capacity states a site is not viable where it has been marketed at a price that reflects market value for a 'reasonable period' which is defined as normally two years (Paragraph 4.15; page 47). The proposed policy requirement allows for 18months of marketing / advertising and therefore reflects the latest guidance and evidence available.	An Employment Land Review has identified the needs regarding employment land, and this has been reflected in Policy DM48, DM49, DM52, which have rigorous criteria for releasing employment land

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 1	New employment opportunities must be based around an evidence base and linking new jobs with local job creation is one way. However, in a similar methodology to housing needs assessments, if the analysis is objectively tested, it should first evaluate the true employment need of the borough before analysing where and if this can be accommodated.	An Employment Land Review has identified the needs regarding employment land, and this has been reflected in Policy DM48, DM49, DM52, which have rigorous criteria for releasing employment land
Barton Wilmore	DMP 1	We note that LBH has proposed an exception to the permitted development rights above and this is being considered in Wood Green Town Centre, Crouch End, Muswell Hill, Highgate, Tottenham Green, Bruce Grove & 6 Employment Areas. Only once a decision on the proposed relief is made can we properly comment on the impact it may have in the Borough as a whole.	Noted
Barton Wilmore	DMP 10	LBH should intend to adopt the provisions of London Plan 2011 policy 5.2. Local Variation prescribes the Code for Sustainable Homes Level that major developments are to achieve by set dates. Haringey's standards set out in the fact box prescribes Code Level 4 for all new residential development, BREEAM 'Excellent' for refurbishments and all non-residential schemes also to achieve 'Excellent'.	Detailed design policies establish the principles of design required in the borough, including policies DM1, DM2, DM3, DM5 and DM6. These policies are consistent with the NPPF's chapter 7 "Requiring good design".
Barton Wilmore	DMP 10	This policy must take into account viability of a scheme, or the constraints of the individual site in its prescription of the Code Level or BREEAM rating. The lack of flexibility within this policy puts a burden on developers that may make development on some sites unviable. Each site and scheme should be assessed on their merits at that point in time with the attainment of the higher levels/ ratings of Code and BREEAM balanced against scheme viability, the constraints of the individual site and all other planning considerations.	Policy DM28 presents options, or Allowable Solutions for situations where it is not possible to meet required CO2 reductions on-site.

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 10	In principle we agree with this approach as it would be unreasonable to expect every site to viably provide onsite provision. However, the Council must ensure that in setting an offsite tariff, this is at a correct level and does not create viability issues when factored with the overarching developer contributions.	Noted
Barton Wilmore	DMP 11	This policy must not simply repeat the provisions of London Plan Policy 7.8. As London Plan Policy 7.8 already requires the preservation and enhancement of heritage assets according to their significance there is no need for a completely separate policy. The NPPF requires the production of succinct local plans (paragraph 17; page 5). By repeating the provisions of the London Plan, the Development Management DPD restates an existing policy requirement and cannot be considered succinct. This proposed policy does not add any new requirements at a local level and should be deleted in the interests of streamlining local planning policy.	Noted, policies have been edited, and management of the historic environment is now managed by DM12, DM13, DM14, DM15 and the Design policies.
Barton Wilmore	DMP 13	The policy states that tall buildings should be located on specified sites but does not acknowledge that there may be sites outside of these areas that are appropriate for tall buildings or inside these areas that are not owing to the specific character of that area. In our view, the policy wording as proposed is too rigid and should not be based on the geographical location of a site, but should be amended to make clear that applications for tall buildings will be assessed on their merits and in light of the local context and character.	Taller buildings impact on communities and a range of factors, including views, wayfinding, public transport accessibility levels and other urban characteristics should be taken into consideration for taller buildings. These are set out in Policies DM1, DM2, DM3, DM5, DM6, DM12. The Haringey Urban Characterisation Study has also been completed and forms part of the evidence base for determining appropriate locations for tall buildings.

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 13	Further to the above, The London Plan 2011 provides a definition of tall buildings in paragraph 7.25 as those that are 'substantially taller than their surroundings'. This definition should be used to within any future policy or at least cross-referreed to that definition. To simply state 'taller than their neighbours', as has been proposed in other boroughs, would not be acceptable	Noted.
Barton Wilmore	DMP 17	The London Plan policies 6.1 and 6.2 sets out the strategic approach to integrating transport and development for improving sustainable transport; enhancing transport capacity and connectivity; promoting non car use and giving maximum parking standards. It is unclear at this stage whether a local variation to the parking standards will be included within an update to the Development Management DPD or an SPD. If LBH intend to change the parking standards from those within the London Plan they should be included in the DPD and subject to examination and testing now. By delaying the review of the parking standards and not including them as part of this consultation, it is not possible to fully review the implications of the Development Management DPD on development. This approach is not helpful to developers wishing to plan developments within Haringey as it provides a degree of uncertainty in the planning requirements going forward.	Policy DM43 clearly states the adoption of London Plan Standards, and the exception to this for when car free development may be appropriate.
Barton Wilmore	DMP 20	The policy should aim to ensure that new local employment and skills will be generated as a result of existing and new development. In achieving this aim, LBH propose to ensure that opportunities for local contractors and labour during the construction period of the development. We support this policy but would caution against a policy that goes beyond this and makes it compulsory to use such contractors, when they simply may not be available or of a skill level required. Where possible, new jobs and local employment resulting from the ongoing use of the building should be secured. However, there is no indication of the mechanism for ensuring this policy can be put into practice. Without further explanation it is unclear whether such a policy would create problems with finding the right type of skilled employees. LBH cannot be expected to produce	Noted.

Consultee	Policy	Summary	Council Response
		employees for all types of jobs irrespective of skill.	
Barton Wilmore	DMP 20	We raise concern with the motion of securing local jobs through a section 106. In the event the appropriate skills set cannot be found within the locality, a prescriptive section 106 requirement that does not allow flexibility could lead to employers not being able to fill jobs.	Noted.
Barton Wilmore	DMP 21	The policy seeks to make sure that there is adequate provision of open space throughout the borough for a range of uses and this element is supported. The policy should also aim to ensure appropriate levels of open space are provided to meet demand arising from a development. This can be through a financial contribution or on-site provision depending on the scale and/ or nature of the development.	Policy DM26 sets out the policy for open space, and Design Policies DM1 and DM2 set out additional information regarding open space in new developments.

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 21	<p>Qualifying developments and the type and level of provision required for the differing developments should be set within the policy to allow certainly. The supporting text should highlight that the standards have been developed based on a range of evidence including Haringey's Green Space Strategy or equivalent. It is not clear what evidence will be used to develop the standards or whether the implications of achieving the standards have been assessed in general or in terms of scheme viability. Furthermore, from the information available it is unclear what evidence has or will be used to develop the proposed standards.</p>	<p>Haringey completed an Open Space and Biodiversity Assessment in 2014 and this is used as the evidence base to inform policies. The supporting text for Policy DM26 sets out the rationale and approach to the delivery and protection of green space within the borough.</p>
Barton Wilmore	DMP 21	<p>With regard to the proposed area requirements, these must not be too prescriptive and should take account of site constraints, the character of the locality or the relative shortfall / oversupply of open space within a particular area. Supply of and demand for green space varies across Haringey and, in our view, a blanket approach to open space standards is inflexible and not appropriate in this instance. The requirement for open / green space should be assessed on a site by site basis taking account of existing and proposed open space within the vicinity of the site, the specific constraints of the site, the character of the area and market demand.</p>	<p>Policy DM26 sets out the policy for open space, and Design Policies DM1 and DM2 set out additional information regarding open space in new developments. In this way open and green spaces can be assessed on a site by site basis having regard to the specific constraints and character of the site.</p>
Barton Wilmore	DMP 21	<p>With respect to the protection of existing open spaces and development close to any valuable open land boundary, it is unclear on what basis this will be derived. Development adjacent to an open or green space could remove an existing conflicting use or operation, thus improving the character and quality of the space whilst being within the prescribed buffer area. For the policy to be effective and sufficiently flexible it must not therefore include prescriptive buffer sizes and clarify that built development should be set an appropriate distance from existing open spaces relative to the importance and significance of the space and in response to its character.</p>	<p>Detailed design policies establish the principles of design required in the borough, including policies DM1, DM2, DM3, DM5 and DM6.</p>

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 21	The role of the DDMPD is to provide a set of detailed matters against which planning applications will be assessed . If it is LBH's intention to provide further standards then these should be set out in this DPD and subject to examination and testing now. They should not be delegated to an SPD which is not subject to the same level of scrutiny and examination.	Detailed design policies establish the principles of design required in the borough, including policies DM1, DM2, DM3, DM5 and DM6. Supplementary guidance will be produced if required but the 2015 version of the policies contains much more detail than the 2013 and therefore may not be required.
Barton Wilmore	DMP 3	The broad aims of the policy address the issue of meeting future housing need, but should not be restricted to 820 units per year. This figure should be a minimum and there must be the flexibility to plan beyond this figure given the likelihood that housing need will increase over the plan period.	The strategic housing target for the borough is set to increase under the Further Alterations to the London Plan to 1,502. The borough has the ability to meet this figure, and will adjust the housing target should it be necessary in line with the London Plan.

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 3	<p>The Local Variation to London Plan Policy 3.4 sets out how this policy should be applied at a local level by identifying which areas are considered to fall within the central, urban and suburban settings. The variation does not set new policy, rather it explains how London Plan policy will apply within the borough. With regard to any future policy wording, the character of areas differs across the borough with areas that have a distinctly urban character, for example, being located outside of the defined town centre boundaries. In our view, the policy wording must not be too rigid and should make clear that each site will be assessed on its merits and in light of the local context and character, transport capacity, existing and future PTAL and proximity to other infrastructure as envisaged by the London Plan 2011. In our view, the DDMPD should not explain how the regional policy framework will apply at a local level, but instead it would be more effective if it reviewed the London Plan density ranges and identified where additional flexibility could be applied. For example, the policy could set out which areas / development sites are appropriate for development with a density at the higher end of the London Plan range.</p>	<p>The strategic housing target for the borough is set to increase under the Further Alterations to the London Plan to 1,502. The borough has the ability to meet this figure, and will adjust the housing target should it be necessary in line with the London Plan. The location of residential development impacts on communities and a range of factors, including location to town centres, public transport accessibility levels and other urban characteristics should be taken into consideration. These are set out in Policies DM1, DM2, DM3, DM5, DM16, and DM18.</p>
Barton Wilmore	DMP 4	<p>Haringey is socially and economically polarised with high levels of deprivation in certain parts and extreme affluence in others. As expected, the majority of social rented accommodation is heavily concentrated in the poorer areas to the east of the borough. On this basis it is crucial that proposed policy wording makes it clear of the basis on which affordable housing provision will be negotiated. The policy should refer to viability appraisals and include details of other factors that may influence provision. Furthermore, the level and type of affordable housing should be considered in the context of the availability of grant and the level of developer contributions for on and off-site infrastructure works. This proposed policy would also benefit from greater explanation as to the basis on which affordable housing provision will be negotiated and what factors will be considered as part of this negotiation.</p>	<p>Noted. Policy DM19 sets out the policy on affordable housing negotiations, and it should be noted that there are additional policies in the Tottenham AAP in an attempt to address the imbalance of housing tenures in certain parts of Tottenham. The policies have explanation on the basis of which affordable housing provision will be negotiated, Strategic Policy 2 also provides guidance on this.</p>

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 4	Further to the above, and in addressing the specific issues in relations to Haringey, the mix and split of tenures should be based on a site by site assessment of the character and tenure mix within the area to ensure the provision of mixed and balanced communities in line with Paragraph 50 of the NPPF and should not be applied rigidly across the borough.	Noted. Policy DM19 sets out the policy on affordable housing negotiations, and it should be noted that there are additional policies in the Tottenham AAP in an attempt to address the imbalance of housing tenures in certain parts of Tottenham. The polici
Barton Wilmore	DMP 7	The aim of this policy should be to secure high standards of amenity through design. The policy must restrict new development that causes significant harm to the amenity of neighbour's buildings and for enhancing the amenity and vitality of surrounding streets and local resident's access to open space. It should also ensure that adequate space standards are provided and enforced.	Design Policies DM1, DM2, DM3, DM5 and DM6 set out policies on amenity through design. These are much more detailed than the policies contained in the 2013 version of the DM DPD and address the issues raised here.
Barton Wilmore	DMP 7	With respect to peoples living conditions, The London Plan 2011 space standards should be applied as a 'minimum' . This policy should not therefore simply repeat the provisions of the London Plan and must add something new. The NPPF states that local plans should be succinct (paragraph 17; page 5).	Noted. Haringey now uses London Plan space standards having revoked supplementary planning guidance which previously informed Haringey's standards.
Barton Wilmore	DMP 7	This supporting wording also states that development should be in accordance with the detailed provisions of the London Housing Design Guide 2011 and the Haringey Housing SPD 2008. The draft policy must therefore provide a policy mechanism for LBH to assess the merit of planning applications against the provisions of the London Housing Design Guide and Haringey Housing SPD.	Noted. Haringey now uses London Plan space standards having revoked supplementary planning guidance which previously informed Haringey's standards.

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 7	The London Housing Design Guide was published as an interim guide for Homes and Communities Agency (HCA) schemes and development on London Development Agency (LDA) land. This document is not policy, has not been subject to independent examination and testing and was not written to be applied to all schemes. On the basis that the policy should seek to apply the Guide as planning policy, the soundness of the Interim Guide also falls to be considered at the Examination. In this respect, the Guide has not been tested independently and it is not clear from the Council's evidence base whether the implications of imposing the standards within the Guide in general or in terms of scheme viability have been assessed.	Noted. Haringey now uses London Plan space standards having revoked supplementary planning guidance which previously informed Haringey's standards.
Barton Wilmore	DMP 7	With regard to the Haringey Housing SPD, a new version to replace the 2008 SPG should be prepared as this will be somewhat out of date once the Development Management DPD is adopted in 2015. For the policy to be sound, LBH should identify the standards within the Guide and SPD that are to be applied within the borough and set out the robust and credible evidence base to justify the application of these standards within LBH. Alternatively, the Council could rely on the standards set out in the London Plan 2011 as these have been subject to independent testing and found to be sound.	Noted. Haringey now uses London Plan space standards having revoked supplementary planning guidance which previously informed Haringey's standards.
Barton Wilmore	DMP 7	The policy lists possible local views that could be considered for protection. However, we consider that the London Plan already protects the strategic views of most importance and only once appropriate modelling has been undertaken can we make a view with respect to local views.	Haringey has completed an Urban Characterisation Study which lists local views and these are included in the 2015 version of the DM DPD in Policy DM6 Locally important views and vista and Appendix A Schedule of Locally Significant Views.

Consultee	Policy	Summary	Council Response
Barton Wilmore	DMP 7	Existing public art should be protected. New public art should be promoted in appropriate locations and where viability of additional developer contributions has been assessed. Public art should not be expected for all major development proposals.	Noted, details on how public art would be expected to come forward, where appropriate, is detailed in policy DM4.
Bob Maltz	DMP 17	I agree that cycle storage (as any other front garden storage, such as bin stores, recycling containers, etc) should be of high quality design and "should benefit from appropriate placement within the garden and screening to minimise the impact on the street scene." I think your policy should, however, acknowledge that in so far as increased cycle usage tends to reduce car usage, it will tend to minimise the negative impact on the street scene of cars parked either on the highway, or in front gardens, where you propose to "support parking...where there is a minimum of 50% of the area being retained as soft landscape."	Noted.
Bob Maltz	DMP 17	I strongly disagree with the policy that the Council should require planning consent for cycle stores in front gardens. I cannot see how an effective £172 (application fee) "tax" on cyclists (as it will inevitably be portrayed in the press) will help to encourage cycle usage, for which secure and weathertight front garden cycle storage is in many cases extremely helpful if not essential. A well-designed, attractive and secure cycle store is not cheap and the additional cost of a planning application (the same cost as an application for an entire dwelling) would impose a further financial burden unless the Council adopts a policy of an equivalent grant to cyclists applying for planning consent.	Noted. Outbuildings on land forward of a wall forming the principal elevation of the site generally require planning permission, this is national guidance not Haringey. Planning applications would be assessed against design policies and DM46.
Bob Maltz	DMP 17	If the Council persists with a policy requiring planning consent for front garden cycle stores, while it allows front garden car parking, in many instances without any requirement for planning consent, and indeed has a parallel policy of supporting car parking "in front gardens where there is a minimum of 50% of the area being retained as soft landscape," it will completely undermine the credibility of the Council's professed commitment to favouring sustainable methods of transportation and will be viewed as an attack (in addition to a tax) on the ever-	Noted. Outbuildings on land forward of a wall forming the principal elevation of the site generally require planning permission, this is national guidance not Haringey.

Consultee	Policy	Summary	Council Response
		increasing number of cyclists in the Borough.	
Bob Maltz	DMP 17	In addition, with front garden cycle (not to mention bin) stores already widespread throughout the borough, and being installed without application or consent in ever-increasing numbers, the question of planning enforcement must arise. In the context of the Council's very limited enforcement resources, and with no credible evidence that that situation will significantly alter for the better within the foreseeable future, it cannot make sense for a Council intent on encouraging cycling to divert such scarce resources to front garden cycle stores rather than to planning law violations which have a far greater impact on the environment and the community. To require planning consent in the absence of sufficient resources to apply widespread enforcement in a credible, fair and consistent manner will undermine the integrity of the Council's planning function and leave the way open for only occasional and perhaps arbitrary instances of enforcement.	Noted. Outbuildings on land forward of a wall forming the principal elevation of the site generally require planning permission.
Bob Maltz	DMP 17	In light of the above, I suggest that the Council's policy with regard to cycle stores in front gardens should be one of the following, 1. The Council will consider any front garden cycle store less than 2m high and not "adjacent to the highway" to be an "enclosure" qualifying as a "Minor Operation" permitted under GPDO 1995 Schedule 2 Part 2 Class A and thus not requiring planning permission.	Noted. It is considered that a two metre high structure in the front garden of residential properties within Haringey is of sufficient size that planning consent and scrutiny is appropriate.

Consultee	Policy	Summary	Council Response
Bob Maltz	DMP 17	2. The Council will not normally seek to enforce a requirement for planning permission to be obtained, except where a cycle store is clearly not complying with reasonable Council design guidance, particularly in relation to appropriate placement within the garden and screening to minimise any negative impact on the street scene.	Noted. The size, placement and screening for cycle storage will be considered as part of a development application, and then again should enforcement action be necessary.
Bob Maltz	DMP 17	Notwithstanding the above, should the Council persist in its draft policy of requiring planning permission for all front garden cycle stores, then it should, in order to encourage cycling, sustainable transport and well-being (and to retain a modicum of credibility for those policies), adopt at the same time a policy of offsetting the planning application fee with a grant in the same amount to cover the applicant's cost (a revenue neutral solution for both parties, which could be done in such a way as to avoid any actual cash transfers and the attendant administrative costs).	The DM DPD contains policies which support cycling, including. DM1, DM2, DM26, DM27, DM42 and DM46.
British Sign and Graphics Association	DMP 15	In the para that begins, 'some of the borough's local shopping centres...', the sentence 'shop fascia and any signage will require...', the reference to planning permission is incorrect. All lawfully displayed advertisements are automatically granted planning permission by section 222 of the Town and Country Planning Act 1990. No separate grant of planning permission is required.	Advertisements which meet certain criteria or are in conservation areas will sometimes require planning consent and therefore it is necessary to have policies to assess these against. The 2013 version of the document has been updated in light of this response.
British Sign and Graphics Association	DMP 15	The BSGA considers that the criterion 'are appropriate and relevant ...' in 'How can this policy be achieved' box in Policy DMP15 goes beyond the considerations permitted by the 2007 Regulations...The content or subject matter is not controllable under the Advertisements Regulations. this criterion should be deleted from the policy. Also in this box, the last paragraph makes no sense.	The 2013 version of the document has been updated, and the 2015 version, specifically policy DM8 now contains relevant policy and justification.

Consultee	Policy	Summary	Council Response
British Sign and Graphics Association	DMP 16	In policy DMP16, the last sentence of the first para, 'Advertisements are constructed....' has no main verb and makes no sense. In the 'how can we address these issues ' box, why have the council picked on hoardings, illumination of hoardings, illuminated fascia signs...' as examples of advertisements (and why not petrol station signs, bus stop signs, supermarket signs' etc)? It makes no sense whatsoever since the para properly refers to all advertisements. Everything in brackets should be deleted.	The 2013 version of the document has been updated, and the 2015 version, specifically policy DM8 now contains relevant policy and justification.
British Sign and Graphics Association	DMP 16	There is an error in the para beginning 'The display of most advertisements...'. The current regulations are the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It is also a fact that all advertisements require consent under these regulations, although most are excepted from control or granted deemed consent.	The 2013 version of the document has been updated, and the 2015 version, specifically policy DM8 now contains relevant policy and justification.
British Sign and Graphics Association	DMP 16	In the first para of the section headed 'Amenity', the final sentence makes no sense and is, anyway, unnecessary since it states the obvious.	The 2013 version of the document has been updated, and the 2015 version, specifically policy DM8 now contains relevant policy and justification.
CBRE for Britel Fund Trustees Ltd	DMP 10	We object to Policy DMP10 in its current form. We encourage the Council to consider a more flexible approach to the provision of a reduction in carbon dioxide emissions. Policy DMP10 states that the Council will now expect all new non-residential development to meet at least BREEAM 'excellent' . This exceeds the expectations of the recently adopted Local Plan: Strategic Policies (2013), SP4. The Council have not indicated whether Policy DMP10 will be subject to a viability appraisal or whether this will be subject to floorspace thresholds or specific projects. On this basis we do not consider that at this stage the requirements are achievable or realistic and may hinder growth, whereby developers are constrained by deliverability.	In respect to Carbon Emissions the 2015 version of the policies has an allowable solutions policy. With respect to the rest of the comment, the Council would expect this as leading practice.

Consultee	Policy	Summary	Council Response
CBRE for Britel Fund Trustees Ltd	DMP 10	<p>We therefore do not consider that Policy DMP10 is the most appropriate strategy when considered against reasonable or existing alternatives. The current policy as it stands is inconsistent with the NPPF which looks to ensure viability and deliverability of projects which secure sustainable economic growth.</p> <p>Paragraph 154 of the NPPF states that Local Plans should be aspirational but realistic. This objective is supported by paragraph 173, which acknowledges that ‘pursuing sustainable development requires careful attention to viability and costs in plan-making and decision taking’.And says that Plans should be deliverable.</p> <p>Therefore, the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable. Whilst our client, in principal, is supportive of the Council’s aim to work towards a low carbon Borough and to reduce carbon emissions from new and existing buildings, we consider that this should not be at the risk of economic growth where the viability of new development is affected.</p>	<p>The 2015 version of this document introduces Policy DM28 which contains allowable solutions and is consistent with the NPPF.</p>

Consultee	Policy	Summary	Council Response
CBRE for Britel Fund Trustees Ltd	DMP 2	<p>We object to Policy DM2 in its current form. We do not consider that all of the issues in relation to retail and town centres have yet been identified or that the role both Tottenham Hale Retail Park and Ferry Island perform as a shopping centre in the Borough has been taken into account.</p> <p>Tottenham Hale Retail Park and Ferry Island serve an important economic function within the Borough, offering a strategic location for further development and located close to a significant transport hub. A specific and positive reference to the Retail Park as a shopping destination in its own right, its ability to assist in the sustainable growth of the local economy and the role it plays in the future redevelopment of Tottenham should therefore be included in Draft Policy DMP2. We consider that the Retail Park has significant potential to assist the Council in meeting their target for additional retail growth in the Borough which includes 13,800sqm comparison goods floorspace and an additional 10,000sqm of convenience goods floorspace by 2016 as part of adopted Local Plan Policy SP10 (Town Centres). Policy SP10 already supports further growth in the area. At present, this theme is not reflected in Policy DMP2.</p> <p>Whilst Policy DMP2 Tottenham Hale is referred to as the Borough's 'out of town centre retail park', the policy does not offer any allowance for new retail floorspace on the park and goes on to state that 'retail uses will not normally be permitted outside of our District Centres'. we encourage the Council to include Tottenham Hale Retail Park as an area with opportunity for a wider variety of retail or leisure development and recognise the key shopping attraction the park offers. We consider this would fully support the Council's own adopted policies and the SPD (2006), which envisages Tottenham Hale Retail Park to have a role which extends beyond the traditional concept of a retail park.</p>	<p>Policy DM2 has been updated to reflect the important role of town centres and town centre uses. DM53 and DM54 contain detail on town centre uses, additional detail on the sites referred to in this comment are contained in the site allocations in the Tottenham Area Action Plan. This includes recognition of the role of the Retail Park.</p>
CBRE for Britel Fund Trustees Ltd	DMP 2	<p>We consider that the Council should adopt a positive and flexible approach towards proposals which seek to enhance the retail and/or leisure offer on the retail park and meet the varying needs of the surrounding communities. The future opportunities to bring forward retail or leisure development which would secure the long term future of the park and the resulting benefits for the</p>	<p>Consistent with the approaches to town centre uses outlined in National Guidance and the London Plan, Haringey has provided a positive and flexible approach</p>

Consultee	Policy	Summary	Council Response
		community should be reflected in the Council's emerging policies.	towards retail and leisure offer.
CBRE for Britel Fund Trustees Ltd	DMP 2	We object to the assertion that Tottenham Hale Retail Parks acts solely as an out-of-town retail park and consider that this undermines the important role that the shopping park performs in providing not only services for the local community but attracting shoppers from the wider community to Tottenham. We consider that the Policy in its current form is at odds with both the adopted Local Plan Policy SP10, the Tottenham Hale Urban Centre Masterplan Supplementary Planning Document (2006) and the proposed Area Action Plan for the wider area, which according to the recently adopted Local Plan: Strategic Policies is seeking to promote the wider Tottenham area for long term redevelopment and has aspirations to expand the retail offer in this location.	DM53 and DM54 contain detail on town centre uses, additional detail on the sites referred to in this comment are contained in the site allocations in the Tottenham Area Action Plan. This includes recognition of the role of the Retail Park.
CGMS for Parkstock Ltd	DMP 1	It is considered that a marketing period of 18 months is overly restrictive and does not allow sufficient flexibility to respond to particular circumstances or site characteristics. A blanket vacancy period of 18 months before alternative uses are permitted will go further to hamper development in the current economic climate. It is recommended that the policy is revised to allow marketing requirements to be agreed with the Council on a site by site basis once the nature of the site and specific issues are fully understood during pre-application discussions	Haringey recently completed an Employment Land Review in order to have an evidence base for which to write policies. This recognises the need to safeguard the majority of recognised employment sites, and is consistent with DM48 which in turn is consistent with Haringey's Strategic Policies and the London Plan.

Consultee	Policy	Summary	Council Response
CGMS for Parkstock Ltd	DMP 13	Whilst the overall approach to this policy is supported in principle, it should be recognised that any Urban Characterisation Study must align with other policy documents which are currently being prepared including the Site Allocations Development Plan Document and the Finsbury Park Supplementary Planning Document (being prepared in conjunction with both Islington and Hackney).	Noted, the Urban Characterisation Study is part of the evidence base and informs all policy documents.
CGMS for Parkstock Ltd	DMP 13	We also seek confirmation that the Urban Characterisation Study will be available as part of the next consultation period on the Development Management Policies to allow consultees to review this evidence base as part of the consultation process.	The Urban Characterisation Study, and all other evidence base documents, will be available as part of the next round of consultation.
CGMS for Parkstock Ltd	DMP 2	It is recommended that the policy provides flexibility to permit and encourage retail uses within Finsbury Park in line with adjoining borough policies and the London Plan. We also suggest that as part of any future review of the Proposals Map and District Centre boundaries, consideration is given to including Finsbury Park within a District Centre designation in order to align with Islington, Hackney and the London Plan.	This is noted, Finsbury Park within Haringey is now included in the District Centre designation.
CGMS for The Mayor's Office	DMP 1	This Policy is generally supported, however, whilst employment generation uses are defined as 'non - residential uses that generate employment' more clarity is required to reflect policy SP8 of the Local Plan, in particular the subtext at para 5.1.5, which states that policing proposed within the employment land hierarchy will be dealt with on an individual site basis and regard had to the Local Plan. The nature of policing uses that may be sought on employment /industrial land...would essentially include deployment and patrol base or custody facilities...Whilst falling outside the B use class definition, policing uses suited to employment/industrial land are employment generating and contribute to employment capacity.	Noted, employment policies within the 2015 version of the document give more clarity and are consistent with the Local Plan and London Plan policies.

Consultee	Policy	Summary	Council Response
CGMS for The Mayor's Office	DMP 1	Vehicle movements are also similar and the majority of these facilities do not require continued public access and therefore have no requirement to be located in town centres. For these reasons there should be some flexibility within DM policy to allow for policing on such land.	Noted
CGMS for The Mayor's Office	DMP 10	Supported	This support is noted
CGMS for The Mayor's Office	DMP 17	This policy should be expanded to refer to emergency services provision and that policing is influenced by operational need and will be assessed on a site by site basis. This will reflect the stance represented by the London Plan.	Noted, policing is included as Community Infrastructure.
CGMS for The Mayor's Office	DMP 18	The requirement to provide section 106 contributions to mitigate the impact of development on emergency services is welcomed.	Noted
CGMS for The Mayor's Office	DMP 18	It is considered that existing facilities should be safeguarded unless replacement facilities are proposed on or off site of the same or better size and quality to serve the needs of the area or development will enable the delivery of approved strategies for service improvements. Thus no net loss approach would allow for the objectives of the MOPAC strategies to be met, by allowing the release of parts of the estate to allow reinvestment in policing.	The MOPAC consultation concluded in 2013 and the draft documents have not yet been adopted, estate design is comprehensively covered in the design and housing policies.
CGMS for The Mayor's Office	DMP 18	The MOPAC have recently consulted on a Police and Crime Plan and draft Estates Strategy. The relevant documents should be referred to in subsequent versions of the DMP and IDP.	Noted.
CGMS for The Mayor's Office	DMP 19	The reference to community uses as being encouraged in town and local centres and local centres is welcomed and reflects Local Plan Policy SP10.	Noted.
CGMS for The Mayor's Office	DMP 2	The reference to community uses as being acceptable within town centres is welcomed and reflects Local Plan Policy SP10.	Noted.

Consultee	Policy	Summary	Council Response
CGMS for The Mayor's Office	DMP 23	In relation to flood risk this policy should reflect guidance at national level and allow for policing uses not required during emergencies to be located within flood zones.	Noted.
CGMS for The Mayor's Office	DMP 7	The acknowledgement that people deserve a safe environment is welcome and supported. Reference should be added to proposals applying the principals set out within Secured by Design and Safer Places to reflect Local Policy SP11.	Noted.
English Heritage	DMP 11	In considering the relevant policies of the London Plan that reference should be made to the Mayor's commitment to heritage -led regeneration (policy 7.9). In planning decisions policy 7.9 seeks to ensure that the design of proposed schemes should recognise the significance of heritage assets in their own right and be used as a catalyst for regeneration. This is an important issue that is not full addressed in the DMP11 or wider document.	Noted, policies DM12, Management of the Historic Environment, and Policy DM13, Heritage Led Regeneration, reflect the Mayor's commitment in policy 7.9.
English Heritage	DMP 11	Other issues which need to be addressed in the policy wording to ensure compliance with the NPPF, include: · the need for proportionate and relevant information to be submitted with proposals, in order that the significance of assets affected and the impact of the development upon those assets can be fully assessed. This reflects the requirements of the NPPF (paras 128-129, and 192-193).	The reasoned justification of the policies refers to the need for applicants to provide a Statement of Significance and Assessment of Impact.
English Heritage	DMP 11	recognition that heritage assets comprise of all designated assets including Registered Parks and Gardens, and non-designated assets such as locally listed buildings;	Noted.
English Heritage	DMP 11	greater clarity that elements that positively contribute to the significance of conservation areas should be conserved. Where opportunities exist for development	Noted.

Consultee	Policy	Summary	Council Response
		then this should enhance the significance of the conservation area;	
English Heritage	DMP 11	<p>where changes are proposed that they should be assessed against whether they would cause harm to the significance of the asset or assets. This includes its setting.</p> <p>If a scheme is proposed that would cause demonstrable harm then this should be assessed against the criteria defined in the NPPF (paras 131-138). For example the great weight should be given to the conservation of designated heritage assets. The more important the asset the greater the weight should be. Where harm or loss is proposed on a heritage asset then clear and convincing justification is required; and</p>	The reasoned justification of the policies refers to the need for applicants to provide a Statement of Significance and Assessment of Impact.
English Heritage	DMP 11	<p>The need for greater emphasis upon the conservation of archaeology, so that it is expressed more clearly, with a reference to Schedule monuments, known archaeology and yet to be discovered archaeology. This includes their management on-site and provisions relating to their investigation, understanding, recording, dissemination and archiving of findings.</p>	There are no scheduled monuments within the borough, however if appropriate the Council will press for their designation. Guidance on archaeology is contained within the reasoned justification.
English Heritage	DMP 11	<p>Within the Fact Box, it would be useful to make reference to the Borough's conservation area appraisals and management plans, and any other heritage related studies, as a key resource in which to help inform how these areas are managed.</p>	Fact boxes have been removed from the 2015 version of the document. Haringey's web page contains links to appraisals and management plans, and will be updated to reflect additional work which is being undertaken on conservation areas within the

Consultee	Policy	Summary	Council Response
			borough.
English Heritage	DMP 13	The reference to the London Plan is partially inaccurate, as policy 7.7 (LDF preparation) advises Boroughs to consider which areas are appropriate, inappropriate and sensitive for tall and large buildings, and to identify them in their LDF.	Noted, an Urban Characterisation Study has been undertaken and now forms part of the evidence base.
English Heritage	DMP 13	We support the inclusion of a tall buildings policy as part of the Development Management Policies. However, we have concerns with the current content as expressed in the ‘How can this policy achieve its aim?’ . Our concern focuses upon the issue of prematurity, in terms of encouraging tall building proposals in locations outside of those already identified in the Core Strategy (now called the Local Plan Strategic Policies - LPSP), principally Haringey Heartlands and Tottenham Hale.	Noted, an Urban Characterisation Study has been undertaken and now forms part of the evidence base.

Consultee	Policy	Summary	Council Response
English Heritage	DMP 13	<p>The LPSP expresses clearly that additional evidence (e.g. AAP and urban characterisation studies (UCS)) would need to be developed that clarifies the appropriateness of Haringey Heartlands and Tottenham Hale for tall buildings, and any other areas within the Borough. It is noted that the Council is committed to undertaking this important work, which we welcome. However, we would suggest that until this evidence is provided, which clearly justifies the potential locations for tall buildings, the wording in DMP13 should be restricted to an evaluation criteria for the assessment of tall buildings in locations that may be considered appropriate (as defined by the LPSP). In addition we would also suggest that the policy recognises that not all existing tall buildings should be retained. For example some may in hindsight be in the wrong location and or too tall. This approach of reviewing the merits of tall buildings is reflected in the EH/CABE Guidance for Tall Buildings (2007).</p>	<p>Noted, an Urban Characterisation Study has been undertaken and now forms part of the evidence base.</p>
English Heritage	DMP 21	<p>We would encourage you to recognise the heritage value of open spaces, of which many are designated in their own right as heritage assets (e.g. Registered Parks and Gardens) or contributors to the significance of assets (e.g. setting or positive element of a conservation area or listed building). In developing the Development Management Policies, we would strongly support the involvement of the Borough's own conservation staff. They are often best placed to advise on local heritage matters. In the meantime we welcome our continued involvement in the Development Management Policies, and look forward to working with the Borough in address the concerns raised.</p>	<p>An Open Space and Biodiversity Study has been undertaken and forms part of the evidence base.</p>

Consultee	Policy	Summary	Council Response
English Heritage	DMP 7	<p>In general we are supportive of the approach proposed subject to the following amendments: How can we achieve this aim? (4th para) We will ask that the local and historic character of the development site and the surrounding area/street scene be taken into account in the design of schemes. New development should address the locality in a positive way.</p> <p>(6th para) Thoughtful and responsive design is particular key in sensitive areas such as where there is an impact on heritage assets, including their settings, such as Conservation Areas and adjacent to Metropolitan Open Land.</p> <p>These changes would help strengthen the policy to ensure good design is delivered in Haringey's historic environment in line with the NPPF (e.g. paras 58, 60-61 and 126)</p>	<p>Taller buildings impact on communities and a range of factors, including views, wayfinding, public transport accessibility levels and other urban characteristics should be taken into consideration for taller buildings. These are set out in Policies DM1,</p>
English Heritage	DMP 7	<p>The supporting text could then be expanded to reflect the policies intention of recognising and enhancing the positive aspects of the Borough and its component parts that contribute to its local distinctiveness. At present the text is limited on this issue and does not explore sufficiently the elements that define an areas character nor advises on how the valued elements of the character can be used and enhanced in future management change. In order to identify the characteristics of the Borough it is not clear whether any Borough-wide characterisation study has been undertaken. Many of the other Borough's in London have undertaken such studies and have seen the benefit of them in helping to inform both plan and decision making functions. The development of this form of evidence base is supported in the NPPF, London Plan policy 7.4 and endorsed in Inspector's reports on recent DPDs.</p>	<p>Noted, an Urban Characterisation Study has been undertaken and now forms part of the evidence base.</p>

Consultee	Policy	Summary	Council Response
English Heritage	DMP 7	We welcome the intention of including possible local views that could require protection. It would be useful to see the evidence for these views and to explore the option of developing a SPD that would help explain how they could be managed	Local views have been included, in Appendix A and DM6 Locally Important views and vista which provides explanation of how views should be managed within the borough.
Environment Agency	DMP 12	There appears to be good coverage of the issues of land contamination and groundwater / watercourses (in the supporting text). However, evidence of water quality of watercourse and groundwater is set out in the Thames RBMP (based on the EU Water Framework Directive) and this is not recognised in the text. Pollution enters watercourses via domestic discharges from misconnected plumbing and urban runoff – neither of these issues is identified or how they could be tackled.	DM40 and DM41 provide policy guidance for the managing drainage connections and waste water, these have been significantly enhanced, clarified and updated from the 2013 draft version of the document.
Environment Agency	DMP 12	We agree that there should be no significant adverse impact on issues such as air quality, land contamination, groundwater and surface waters etc. However, based on evidence in the Thames RBMP and the requirement to achieve good status in waterbodies by 2027, the policy approach should also aim to improve on the existing situation wherever possible.	Noted.
Environment Agency	DMP 12	The supporting text on 'Contaminated Land' and 'Groundwater and Watercourses' is good because it outlines the requirements for desk top studies and site investigations should development be proposed in areas of potential contamination. We also support the references to our GP3 policy to ensure our sensitive groundwater areas and abstraction points are protected and the need to ensure soakaways and infiltration are assessed. We would add that piling foundations in areas of potential contamination should be also be appropriately assessed via a piling risk assessment.	Noted.

Consultee	Policy	Summary	Council Response
Environment Agency	DMP 13	Rivers and their corridors are not suitable for tall buildings because shading of the buildings will prevent sunlight from reaching the vegetation and watercourse channel which can have a detrimental impact on aquatic habitat. The corridor adjacent to a watercourse provides important habitat for the terrestrial life stages of many aquatic insects and migration routes for bats. Artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using and inhabiting the river and its corridor habitat. Wherever possible, riverside locations for tall buildings should be avoided. Where this is not possible the development should incorporate wide buffer zone areas adjacent to the watercourse to lessen the impacts of shading and artificial lighting. This could either be addressed in the supporting text or the policy. The policy approach currently does not outline the potential impacts of shading and lighting on ecology (including watercourses) or how this impact should be addressed.	Noted, the location of taller buildings is sensitive and subject to a range of factors. The location and design of taller buildings is subject to DM1, DM2, DM3, DM5, DM6, DM25, Dm26 and DM27. DM34 Environment Protection and associated reasoned justification contains detailed guidance on light pollution.
Environment Agency	DMP 14	Your approach to basement development needs to be based on the evidence within your Surface Water Management Plan and Strategic Flood Risk Assessment. Are there areas where new basement dwellings would be totally inappropriate because of the hazards from flooding? Are basement dwellings needed in terms of contributing to Haringey's overall housing target ? If there are areas where they would be acceptable in principle and/or needed for wider planning reasons (note requirement for sequential test in the National Planning Policy Framework), what design measures would be needed to mitigate any flood risks? Risks from both fluvial and surface water flooding should be considered, as well as any potential for groundwater flooding.	The 2013 version of the document has been updated, and the 2015 version, specifically policy DM24 now contains relevant policy and justification.
Environment Agency	DMP 14	b. Should we only allow basement development in certain parts of the borough? As stated above this depends on the flood risks identified in your SWMP and level 2 SFRA – these should outline the areas of highest flood risk and what this actually means e.g. likely flood depths, rate of inundation, duration of flooding etc. New basement dwellings are classed as highly vulnerable and indicated as not appropriate in flood zone 3 (see Tables 1, 2 and 3 of the Technical Guide to	The 2013 version of the document has been updated, and the 2015 version, specifically policy DM24 now contains relevant policy and justification.

Consultee	Policy	Summary	Council Response
		the NPPF).	
Environment Agency	DMP 14	<p>c. Do you agree on how we are going to address the issues in relation to basement development in Haringey?</p> <p>There is recognition of flood risk and impact on the water environment in the draft policy i.e. ‘we will resist basement development which includes habitable rooms and other sensitive uses in areas prone to flooding.’ However, we think more needs to be done to understand the flood risks to enable informed spatial decisions to be made about what type of basement development will be acceptable in Haringey. This would need to inform the Council’s draft Basement Development Guidance Note to ensure applicants are aware of guidance in relation to flood risk and drainage.</p>	<p>The 2013 version of the document has been updated, and the 2015 version, specifically policy DM24 now contains relevant policy and justification.</p>
Environment Agency	DMP 22	<p>DMP22 Nature Conservation</p> <p>a) Have we identified all the issues in relation to Nature Conservation?</p> <p>Not yet. Although you recognise designated sites for nature conservation, more should be done to recognise the key role rivers (and water quality) have to the nature conservation of the borough. The Thames RBMP contains evidence of the ecological health of the rivers in Haringey. The State of the Environment Report 2011 available on our website provides a useful summary of the ecological status of Haringey’s watercourses – see here. Local Authorities have a duty to consider River Basin Management Plans when developing policies or making decisions on planning applications. To help Local Authorities understand their role we developed a number of actions they can take which are listed in Annex C of the Thames River Basin Management Plan (see page 115). For example, action TH0017 ‘Biodiversity and New Development’ guides that when developing new DPDs the planning authority should use evidence relating to ‘priority water bodies’ alongside other relevant evidence to maximise opportunities for</p>	<p>Updated DM40 provides more detailed guidance on watercourses and includes a presumption against proposals which adversely affect the natural functioning of main rivers and ordinary watercourses.</p>

Consultee	Policy	Summary	Council Response
		<p>enhancing biodiversity where this can contribute to an improved environment. The River Lee, Pymmes Brook and Moselle Brook are currently classified as having 'moderate' ecological status and steps will need to be taken in the future to enable them to reach 'good' ecological status.</p>	
Environment Agency	DMP 22	<p>Some of the issues preventing these watercourses achieving good status include being culverted, heavily modified (e.g. concrete channels and banks, structures such as weirs) and suffering poor chemical water quality due to domestic misconnections, sewerage discharges and urban runoff. New developments in Haringey can play an important role in enhancing the ecological value of the Lee, Pymmes Brook and Moselle Brook. The strategic policy SP5 'Water Management and Flooding' makes a promising start (restore and enhance the Blue Ribbon Network...deculverting wherever feasible) from which to develop criteria to shape new developments.</p>	<p>Updated DM40 provides more detailed guidance on watercourses and includes a presumption against proposals which adversely affect the natural functioning of main rivers and ordinary watercourses.</p>
Environment Agency	DMP 22	<p>The presence of non-native species along river corridors is a problem recorded in Haringey and noted in the State of the Environment Report 2011. The most common is Japanese Knotweed which has been recorded along the Lee Navigation, Pymmes Brook and Old Moselle Brook. Giant Hogweed and Floating Pennywort have also been recorded. Invasive non-native species can lead to a decline in the native species due to habitat destruction and competition for food and light.</p>	<p>Noted.</p>

Consultee	Policy	Summary	Council Response
Environment Agency	DMP 22	<p>b) Do you agree with how we will address the issues in relation to Nature Conservation?</p> <p>We note the intention to set out criteria which will need to be met should development on or adjacent to designated sites for nature conservation come forward – we support this and would expect, given the evidence in the Thames RBMP, to see criteria on how developments will enhance the ecology of rivers and their corridors. We are concerned with the term ‘designated sites for nature conservation’ as it implies that only EU, national or locally designated sites will be recognised in this policy. The Fact Box on page 60 does specify ‘Ecological Corridors’ however the link between this category and rivers is not explicit.</p>	<p>Noted, the location of taller buildings is sensitive and subject to a range of factors. The location and design of taller buildings is subject to DM1, DM2, DM3, DM5, DM6, DM25, Dm26 and DM27. DM34 Environment Protection and associated reasoned justification contains detailed guidance. Fact boxes are not used in the current version of the document.</p>
Environment Agency	DMP 22	<p>Some of your supporting text outlines measures that would be suitable policy criteria, for example on page 59, green and brown roofs, green walls and the importance of continuity of green corridors. We recommend the policy criteria also include the following:</p> <p>River Lee, Pymmes Brook and Moselle Brook to be restored and enhanced in line with the measures outlined in the Thames RBMP.</p> <p>Wherever possible watercourses should be deculverted. Where this is not possible, culverts in a poor condition should be repaired or replaced and developments set-back.</p> <p>Developments to contribute to creating a network of green spaces across the borough, to include the provision of new green spaces, connection to existing green spaces, living roofs and walls and Sustainable Drainage Systems that improve water quality and habitat.</p> <p>Removal of non-native species e.g. Japanese Knotweed, and ensuring riverside buffer strips are planted with native species.</p> <p>Striking an appropriate balance between quiet, undisturbed and isolated areas for wildlife and creating places for people to access and enjoy.</p>	<p>Deculverting of water courses is Haringey policy and contained in the Strategic Policies of the Local Plan.</p>

Consultee	Policy	Summary	Council Response
Environment Agency	DMP 23	<p>DMP23 Water Management and Flood Risk</p> <p>a) Have we identified all the issues in relation to Water Management and Flood Risk?</p> <p>Not yet. You recognise sources of flood risk in Haringey i.e. fluvial, surface water, sewer flooding etc. However, we don't think the specific recommendations of your SWMP which is your evidence of the surface water flood risks in Haringey have been used to inform the draft policy. Also, a level 2 SFRA would provide the evidence of specific fluvial flooding characteristics (flood depth, velocity, rate of inundation, duration of flooding) and measures that will be required to address the flood risk. This is required because the intention is that areas to the east of your borough lying adjacent to the River Lee (e.g. Tottenham Hale, Northumberland Park) will be areas where development and growth is focussed. At this stage we think the specific flood risk issues in these areas have not been properly identified.</p>	A level 2 SFRA has been completed as part of the evidence base for the current version of the document.
Environment Agency	DMP 23	Your SWMP will have identified areas at risk from surface water flooding such as Critical Drainage Areas (CDAs) and more focused Local Flood Risk Zones (LFRZs). With the future SuDs Approval Body role under the Floods and Water Management Act 2010, you will need to consider how this policy could assist you in fulfilling this role and what requirements you might have for developments within CDAs/LFRZs.	A level 2 SFRA has been completed as part of the evidence base for the current version of the document.
Environment Agency	DMP 23	The policy text does not outline what the water resource issues are for Haringey. Haringey Borough Council sits within an area of 'serious' water stress. This means there is a high population with high water demands and limited water availability. Average water use in Haringey Borough in 2010/2011 is 166.5 l/h/d which is above the England and Wales average of 148l/h/d.	Noted.

Consultee	Policy	Summary	Council Response
Environment Agency	DMP 23	Water quality is a key issue for Haringey. The State of the Environment Report for Haringey 2011 summarises this - basically watercourses are currently achieving 'moderate' status in the Thames River Basin Management Plan. One of the reasons for not reaching good status or potential is poor chemical water quality as a result of domestic misconnections (washing machines, sinks and toilets discharging into the surface water drainage network instead of foul network) and urban runoff. The presence of phosphates and limited fish populations in rivers (particularly in the River Lee) indicate a problem with sewerage discharges and domestic misconnections.	Noted.
Environment Agency	DMP 23	b) Do you agree with how we will address the issues in relation to Water Management and Flood Risk? There are positive elements in the draft policy. However, we think it should be reflective of the borough specific flood risk and water management issues and be more aspirational. Using the evidence and recommendations in the SWMP and level 2 SFRA to inform the policy approach and criteria will help you do this. We are not sure it is necessary to repeat the requirements of site specific Flood Risk Assessments and Sequential Test in the policy as they are laid out in the National Planning Policy Framework. However, once you have undertaken a sequential test of your site allocations and considered windfall development, it will be clearer what requirements will be necessary.	Flood water management issues are addressed.
Environment Agency	DMP 23	We think the positives are as follows: It supports compliance with London Plan policies and guidance and Haringey's strategic policies particularly SP5 Water Management and Flooding. Has a requirement for an 8 metre buffer zone specifically mentioned in the policy. It specifically mentions that all development should incorporate SuDs with reference to the London Plan drainage hierarchy and aim for Greenfield runoff rates.	Noted.

Consultee	Policy	Summary	Council Response
Environment Agency	DMP 23	<p>It is difficult to advise as to specific requirements for developments as a level 2 SFRA has not been undertaken. You should consider measures that will enable developments to mitigate and adapt to climate change. Measures such as protecting and providing flood storage areas, applying the sequential approach at site level (more vulnerable developments in the areas of the site at lowest risk) and flood resilience and resistance measures may be recommendations that come forward. We also stress that given evidence of water quality issues in the borough, there is wording in the policy that directs applicants to select SuDs measures that clean and treat the runoff through filtration systems e.g. wetlands, attenuation ponds, swales etc.</p>	<p>Noted, level 2 SFRA has been completed in consultation with the EA.</p>
Environment Agency	DMP 23	<p>Similarly for surface water flood risk you need to decide what standards will be required and how you will review and enforce those standards. Will you require flood risk assessments for specific developments in areas at risk of surface water flooding? This relates to your future role as a SuDs Approval Body. London Borough of Hackney has drafted a development management policy (DM44 Flooding and Flood Risk) using evidence from their SWMP and this may be a useful example to draw upon.</p> <p>The aim of the policy states that it seeks to manage water and reduce flood risk by locating new developments in appropriate places through sensitive flood resilient design and construction etc, yet there are no measures in the policy approach related to water management. We note there is support for the London Plan's requirement for residential development to achieve 105 litres or less per head per day. Non-households also consume significant amounts of water. In London non-households accounts for 29 percent of water consumption and is therefore an area where further water and carbon savings can be made. We therefore recommend you consider that new non-household development, including refurbishments, achieve a water efficiency standard, such as BREEAM (BRE Environmental Assessment Method) 'Excellent' with maximum number of 'water credits'. BREEAM (BRE Environmental Assessment Method) is the leading and most widely used environmental assessment method for buildings. BREEAM</p>	<p>Noted, level 2 SFRA has been completed in consultation with the EA.</p>

Consultee	Policy	Summary	Council Response
		<p>credits are awarded for water where water efficient appliances (e.g. low flush toilets), water metering, leak detection systems and water butts are in place.</p> <p>Alternatively buildings could meet the 'best practice' level of the AECB (Association for Environment Conscious Building) Water Standards. It is also worth considering whether these standards should change for the future.</p>	
Environment Agency	DMP 23	<p>We recommend the detailed policies include:</p> <p>1. Floodplain as an asset that needs to be protected for flood storage (which can have wider benefits such as enhancement of open green space/habitat/amenity and health) which is a recommendation of the Thames Catchment Flood Management Plan.</p>	Noted.
Environment Agency	DMP 23	<p>2. Developments are set back from river banks and flood defences, providing a buffer zone area (this means we can access the rivers/defences for maintenance/repair works and provide riverside habitat).</p>	Noted.
Environment Agency	DMP 23	<p>3. the sequential approach is applied at site level e.g. The layout of the site is designed to ensure the more vulnerable uses are located in the least risky parts of the site.</p>	Noted.

Consultee	Policy	Summary	Council Response
Environment Agency	DMP 23	4. Standards for the incorporation of sustainable drainage systems (referencing the Surface Water Management Plan and future move to SuDs Approval Bodies). SuDs should be designed into a site layout at the earliest stage to maximise their effectiveness. The London plan and associated supplementary planning guidance highlight the SuDs hierarchy - developers need to look at the most sustainable techniques first (such as attenuation ponds, rainwater harvesting, swales) that deliver multiple benefits before looking at the other measures. Also, Greenfield runoff rates should be the target.	Noted.
Environment Agency	DMP 23	5. water efficiency standards for residential (code level 4/105 litres) and non residential (BREEAM Excellent).	Noted.
Environment Agency	DMP 23	6. water quality is a key consideration with reference to the Thames River Basin Management Plan - developments should seek to improve water quality wherever possible through the use of appropriate drainage techniques e.g. SuDs, pollution prevention measures such as oil interceptors.	Noted.
Environment Agency	DMP 23	7. recognise the importance of climate change adaptation, and flood risk resistance and resilience measures in developments.	Noted.
Environment Agency	DMP 23	8. a policy detailing how developments can contribute to a network of green infrastructure, create new habitat, link to existing open spaces, green corridors along watercourses, green roofs and walls, SuDs. Wherever possible contribute to or deliver river restoration and naturalisation .	Noted.
Environment Agency	DMP 8	We welcome the approach that sustainability statements will be submitted with planning applications demonstrating how a planned development has dealt with the issues of sustainability and climate change. However, we are concerned that without some direction as to what design standards a development will be expected to achieve applicants will not understand what is expected of them. Will Haringey produce local guidance or will applicants be directed to other guidance? How many or what type of design measures will developments be	Noted.

Consultee	Policy	Summary	Council Response
		expected to incorporate?	
Environment Agency	DMP 8	You may be aware that the Mayor is revising the Sustainable Design and Construction Supplementary Planning Guidance (May 2006) to support implementation of the London Plan policies. We recently launched a Climate Ready service on our website which provides tools and information to help communities and businesses adapt to climate change impacts. This guidance will be useful to you in terms of developing the policy approach and also as signposts to development applicants.	Noted.
Environment Agency	DMP 8	b. Do you agree that a requirement to follow the Demolition Protocol (or similar waste auditing tool) should be introduced? Yes because where demolition is necessary this would encourage developments to re-use and recycle demolition materials on site which aligns with EU Waste Hierarchy and Mayor's waste management targets.	Noted.
Freehold Community Association	General	Consultation and community involvement. An essential part of the 2004 Act and the Localism Act is that there needs to be greater involvement of local people in planning for our areas. The current consultation has fallen far short of the aspirations expressed in Haringey's Statement of Community Involvement and Community Engagement Strategy.	The 2013 consultation exceeded the statutory requirements of the regulations regarding consultation and met or exceeded the requirements of the statement of community involvement. Please see the main report for the consultation techniques used for this.

Consultee	Policy	Summary	Council Response
Freehold Community Association	General	<p>Development Management Policies</p> <p>To achieve Haringey's ambition of "Getting the right development in the right place" their Development Management Policies must be based on strategic policies that have objectively assessed Haringey's social, economic and environmental needs.</p> <p>The absence of significant background papers, such as a local economic assessment or a surface water management plan, undermines the soundness of their strategic policies and hence the Development Management Policies.</p>	<p>The 2013 version of the document was, as stated in the accompanying cabinet report, a direction of travel document. The 2015 version of the document contains more detailed policies and there is a comprehensive evidence base which has informed the current policies.</p>
Freehold Community Association	General	<p>Duty to Cooperate</p> <p>There are a number of sites in Haringey that are now identifiable as strategic under the Localism Act and the production of evidence and their assessments must be carried out in cooperation with other Councils and bodies as specified in Local Development Regulations. The proposed DMP's and in particular the Sustainability Appraisal provide no evidence of any identification or recognition of Strategic sites and of compliance with Haringey's duty to cooperate and are therefore unsound.</p>	<p>The London Borough of Haringey has, and continues to, meet with neighbouring boroughs and other bodies to discuss things which may be relevant under the borough's duty to cooperate.</p>
Freehold Community Association	General	<p>Sustainability Appraisal.</p> <p>The absence of background assessment and cooperation evidence undermines the soundness of the Sustainability Appraisal. It should also contain evidence of the reasons for conclusions and decisions without the need for consultees to embark on a paper chase. EU Directives state that..... SA's should contain "an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information." The Sustainability Appraisal fails to meet the Public consultation requirements.</p>	<p>The 2013 version of the document was, as stated in the accompanying cabinet report, a direction of travel document. The 2015 version of the document contains more detailed policies and there is a comprehensive evidence base which has informed the current</p>

Consultee	Policy	Summary	Council Response
Friends of the Earth Tottenham and Wood Green	DMP 1	p10 Unfinished sentence “where the borough is.....”	Noted.
Friends of the Earth Tottenham and Wood Green	DMP 10	<p>b) we agree that BREEAM excellent should be the minimum for major domestic refurbishments.</p> <p>c) we think the carbon offset fund is worth investigating but that adequate safeguards need to be in place to prevent it being an easy let-out clause.</p> <p>d) yes we agree an energy assessment of the whole dwelling should be required for proposed extensions and that this can be an affective way to improve energy efficiency of existing buildings.</p> <p>e) yes we agree that solid wall insulation should be considered.</p>	Noted.
Friends of the Earth Tottenham and Wood Green	DMP 11	<p>b) we agree with the general approach</p> <p>c) we think that the need to improve energy efficiency should be given high priority, and that e.g. fitting solar panels to roofs that are not very visible from the street, fitting good solid wall insulation to facades that are not in themselves of great interest, and of internal insulation where internal character is not important, should all be encouraged.</p>	Noted.
Friends of the Earth Tottenham and Wood Green	DMP 12	Nature conservation is listed as an aim here but it is not clear how this is addressed in the policy, apart from possible impact of light pollution on nocturnal wildlife. Noise standards should be sufficiently rigorous that noise creep from a number of different developments is prevented.	Noted, updated nature conservation policy Dm34 contains more details than the 2013 version of the document.

Consultee	Policy	Summary	Council Response
Friends of the Earth Tottenham and Wood Green	DMP 13	The sentence beginning “In Haringey, we have said that....” seems to make no sense. Is there a superfluous “or”?	Noted, the 2015 version of the document is a comprehensive update.
Friends of the Earth Tottenham and Wood Green	DMP 17	The aims should include reducing CO2 emissions and emissions of air pollutants like NOx and PM10 as well as access. It should also prioritise walking and cycling for health and other reasons. Let’s have some joined up policy making here! We would like to see the restrictions on paving front gardens made stricter. All surfacing should be permeable, not just areas over 5m2. And there should be a maximum amount of paving. Otherwise we agree with the general approach.	Noted, some developments are permitted development rights and therefore the council does not have the power to make planning policies to manage them.
Friends of the Earth Tottenham and Wood Green	DMP 18	The list of infrastructure that can be progressed via CIL or s106 should include green space, especially in areas of open space or nature deficiency.	The list of infrastructure has been expanded.
Friends of the Earth Tottenham and Wood Green	DMP 19	In the box “How can this policy achieve its aim? – please note that criteria is a plural word, so it should read “the council will develop a criterion” or the council will develop criteria” not “a criteria.”	Noted.
Friends of the Earth Tottenham and Wood Green	DMP 21	This policy should in its justification refer to the growing body of evidence that it is not just sport and recreation that affect quality of life, but access to nature. More biodiverse open spaces improve mood, reduce stress etc more than less diverse spaces.	Noted.

Consultee	Policy	Summary	Council Response
Friends of the Earth Tottenham and Wood Green	DMP 21	As above in DMP18, we suggest that CIL/s106 be extended to include creating new areas of green open space especially in areas of deficiency; and that this is about creating quality, not just the land area. Otherwise we agree with the approach.	Noted, the Borough has undertaken an open space and biodiversity assessment. It is recognised that were additional land cannot be provided, improving access or quality of open space may go some distance toward addressing deficiency.
Friends of the Earth Tottenham and Wood Green	DMP 22	We would like to see gardens recognised individually and collectively as areas for biodiversity. We should encourage gardens to become corridors by requiring, in new or refurbished properties, fences/walls that are permeable to e.g. hedgehogs.	Noted, some developments are permitted development rights and therefore the council does not have the power to make planning policies to manage them.
Friends of the Earth Tottenham and Wood Green	DMP 22	The section should also reflect the importance and effectiveness of trees in climate adaptation. Well chosen and laid out trees can reduce temperature in adjacent buildings during summer heat waves by 2-4oC. We need to be planting now to minimise suffering and costs in future. We otherwise agree with the general approach.	Noted, the planting of trees is difficult to regulate under planning policy.
Friends of the Earth Tottenham and Wood Green	DMP 23	We agree with the approach and hope that SUDs will be more strongly required.	Noted.
Friends of the Earth Tottenham and Wood	DMP 6	p22 What is the definition of “easily accessible by public transport, cycling and walking” in this context? What parts of the borough are considered not easily accessible?	The Public Transport Accessibility Level (PTAL) is used to assess how parts of the borough are accessible or not. More information can be

Consultee	Policy	Summary	Council Response
Green			found on TFL's website.
Friends of the Earth Tottenham and Wood Green	DMP 7	p26. We propose that the views of Alexander Palace from Tottenham and the Lee Valley should be included in protected views.	An updated list of views is included in Appendix A, and a policy for managing them is contained in DM6.
Friends of the Earth Tottenham and Wood Green	DMP 7	We think public art should be formally protected. But difficult judgements might then be entailed about the quality of art. People in Tottenham Hale generally did not like the water feature (which didn't work) outside the tube station. We wouldn't want planning to then make it difficult to remove bad art.	Noted.
Friends of the Earth Tottenham and Wood Green	DMP 8	p27. We agree with the policy approach. We have some concerns about implementation. For example, the sustainability appraisal scoping document for the massive redevelopment of the St Ann's hospital site omitted mention of energy and climate change altogether until we pointed it out. Can we be reassured that energy and climate change will be mandatory parts of all sustainability appraisals in future?	Noted.
Friends of the Earth Tottenham and Wood Green	DMP 9	We agree that b) a requirement to follow the Demolition Protocol should be introduced, and that c) justification for demolition should be included in planning applications.	Noted.
GLA	DMP 1	The first paragraph of page 8 should refer to London Plan Policy 4.4 (which deals	Noted, the policies have been

Consultee	Policy	Summary	Council Response
		with the hierarchy of employment land), as well as Policy 2.17.	comprehensively re-written.
GLA	DMP 1	'Warehousing and logistics' ought to be added to the uses identified under Strategic Industrial Locations (SIL) on page 8.	Noted, the policies have been comprehensively re-written.
GLA	DMP 1	It is not clear how the criteria set out on pages 8 and 9 relate to the various types of industrial and employment land set out in the London Plan and the Local Plan: Strategic Policies. For example, will all the criteria be applied equally to all types of land? A more rigorous approach to determining whether land is surplus to requirements in SIL should be applied, having regard to the Mayor's Land for Industry SPG (paragraphs 4.14 to 4.16).	Noted, the policies have been comprehensively re-written. More detailed policies have been included on industrial land which his consistent with the London Plan position.
GLA	DMP 10	The acknowledgement of the London Plan's strategic carbon dioxide reduction targets for domestic and non-domestic buildings is strongly supported. However, the Council may wish to consider the wording of the second paragraph on page 31 which references a 'required' 20% carbon dioxide reduction through renewable energy technologies. Whilst it is acknowledged that London Plan paragraph 5.42 states that there is a presumption that major development proposals seek to reduce carbon dioxide emissions by at least 20% through on-site renewable energy generation - the savings delivered through energy strategies should be delivered in accordance with the principles of the London Plan energy hierarchy first and foremost. I.e. developments should first prioritise savings by efficiency means, and decentralised energy, before renewable energy technologies are considered.	Noted, the policies have been comprehensively re-written.
GLA	DMP 10	The intention to introduce a carbon dioxide off-set fund (in accordance with the aims of London Plan Policy 5.2, part E) is supported. In developing this approach the Council should have regard to the forthcoming SPG on Sustainable Design and Construction and, specifically, the guidance this contains on carbon dioxide off-setting funds.	Noted, the policies have been comprehensively re-written.

Consultee	Policy	Summary	Council Response
GLA	DMP 10	On page 32, the text related to the introduction of a carbon off-set fund, the word 'reductions' is missing from a sentence i.e. "The fund would compensate for the shortfall in carbon emissions reductions through a levy,..".	Noted, the policies have been comprehensively re-written.
GLA	DMP 13	The emerging approach to managing development that may include tall buildings is supported, and officers welcome the proposal to analyse the character and context of the borough through a character study. It is recommended that the study follows the approach set out in the Mayor's draft Shaping neighbourhoods: Character and Context SPG (refer to figure 2, page 37 and figure 6.1, page 70), and considers not only the physical elements of character, but also cultural, social, economic, perceptual components (see diagram on SPG page 53). The detail of the approach within policy DMP13 should be updated in response to the findings of the character study accordingly.	Noted, the policies have been comprehensively re-written.
GLA	DMP 15	The proposal to promote activity onto high streets through on-street dining is supported. It is also welcomed that the policy recognises that pavement seating should only be permitted where footways are sufficiently wide to allow for this. Whilst this should be assessed on a case by case basis, TfL recommends that a minimum clear width of two metres is retained for footways.	Noted.
GLA	DMP 16	The proposal to consult TfL on advertisement applications adjacent to its road network is supported.	Noted.
GLA	DMP 17	It is welcomed that this policy requires the submission of transport assessments and travel plans for developments above certain size thresholds. However, TfL recommends that overt reference is made within the supporting text to TfL's Transport Assessment Best Practice Guidance (2010) . The requirement of submitting construction logistics plans, and delivery and servicing plans - as well as a Travel Plan should also be emphasised, and TfL's guidance 'A New Way to Plan' should similarly be referenced.	Noted.

Consultee	Policy	Summary	Council Response
GLA	DMP 17	This policy states that development proposals will be assessed against the Council's car and cycle parking standards. Whilst the document is not explicit on what and where these standards are, it is assumed that this refers to the saved UDP policies on car and cycle parking, and car free development - as referenced in the Local Plan: Strategic Policies. However, as these standards were set in 2006 and do not now reflect those within the London Plan, the explanatory text also references outdated policy such as PPG13. As such, TfL recommends that car and cycle parking standards are reviewed, including those for Blue Badge parking and Electric Vehicle Charging Points (EVCPS) and, for the sake of clarity, included within the Development Management Policies document.	Noted.
GLA	DMP 2	Scale appears to be the only consideration in relation to town centre uses. The Council is encouraged to word this policy to ensure that the scale of retail, leisure and community development would be considered relative to the size, role and function of a town centre in line with London Plan Policy 4.7 B(a).	Noted.
GLA	DMP 2	The final paragraph of the policy box on page 12 states that "retail uses will generally not be permitted outside our District town centres". This statement should apply to all town centres, not only District centres. The paragraph should, therefore, be reworded to accord with the London Plan approach – town centres first, and if there are no town centre sites available, then accommodate development for town centre uses on well integrated edge of centre sites.	Noted, the policies have been comprehensively re-written.
GLA	DMP 2	The aspiration to manage issues with respect to betting shops and hot food takeaways is supported. The Council is advised to review and consider the Mayor's draft Town Centres Supplementary Planning Guidance, to help inform the detailed development of this policy.	Noted, there is a more detailed policy on this in the redrafted version of the document.
GLA	DMP 3	The Council's stated commitment to meet and exceed its annual monitoring housing target (820 units per year) is supported.	Noted, the housing target is expected to change after the adoption of the FALP.

Consultee	Policy	Summary	Council Response
GLA	DMP 3	Whilst the Council's aim to seek flexibility with respect to student accommodation is recognised, the rationale behind the intention to ensure that student housing is capable of being converted into self-contained residential units is questioned. The London Plan treats student housing differently to self-contained housing, both in terms of affordable housing contributions and space standards. Moreover, London Plan Paragraph 3.53 states that student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specific educational institutions- precisely so it cannot be turned into conventional housing.	Noted.
GLA	DMP 4	The second paragraph of the first policy box indicates a proposed housing provision of 70% social rent and 30% affordable rent or sale. This does not reflect the proposed affordable housing tenure split within the recently adopted Local Plan: Strategic Policies, or the strategic aims of London Plan Policy 3.11 (and the Mayor's draft Revised Early Minor Alterations to this policy). Following discussion with the Council it is understood that this is a result of a clerical error, and the proposed split within the affordable housing provision should be: 70% social rent/affordable rent and 30% intermediate. This would carry forward the locally specific approach established by the Local Plan: Strategic Policies, and the Council should revise this policy accordingly.	Noted, the policies have been comprehensively re-written.
GLA	DMP 4	In the final paragraph on page 16 the Council is acknowledging how the specific circumstances of individual sites will inform affordable housing negotiations. Whilst this is supported the Council should also include a reference to the impacts of the availability of affordable housing resources, viability, and maximisation as per London Plan Policy 3.12.	Noted, the policies have been comprehensively re-written.
GLA	DMP 7	The Council's intention to provide a single policy to promote an integrated response to urban design and quality of life is supported, however, GLA officers are of the view that this needs to be more comprehensive to ensure it provides	Noted, the policies have been comprehensively re-written, especially with regard to design.

Consultee	Policy	Summary	Council Response
		greater clarity and adequate coverage of issues.	
GLA	DMP 7	Leading on from the policies within the recently adopted Local Plan: Strategic Policies, the Council may wish to arrange this policy so it would start at the townscape/neighbourhood scale, and then work down to managing localised amenity issues.	Noted.
GLA	DMP 7	The opening paragraph should reference the Lifetime Neighbourhoods principles (refer to London Policy 7.1) and set out the desired approach for creating inclusive places and high quality environments. Principles within London Plan Policy 7.5 (public realm) and 7.6 (architecture) are also relevant for this section of the plan and should be incorporated accordingly.	Noted.
GLA	DMP 7	It is noted that the strategic view from Alexandra Palace to Central London and St. Pauls' Cathedral is referenced in the third paragraph of page 26. The Council should consider whether a specific development management policy to promote the managed local protection of this view should exist within this document.	Noted, there is an updated and more comprehensive policy on views.
GLA	DMP 7	The Council is advised that the design guidance within the Mayor's Housing SPG (2012) now replaces that within the Interim London Housing Design Guide.	Noted.
GLA	DMP 7	Whilst this policy does make reference to the need to promote development that encourages cycling and walking, TfL recommends this is reinforced with the mention of specific measures such as the Strategic Walking Network, Legible London and the Mayor's Cycling Vision.	Noted.

Consultee	Policy	Summary	Council Response
GLA	DMP 7	In developing policy DMP7 further, the Council should also seek to encourage designs that increase the permeability of sites, and establish a web of connections (making areas more pedestrian and cycle friendly), and increase access to strategic transport networks. This approach would also align with the intentions of the emerging Upper Lee Valley OAPF.	Noted, the policies have been comprehensively re-written.
GLA	DMP 8	Whilst it is noted that policies on minimising water use and incorporating sustainable urban drainage systems are picked up within Policy DMP23, the Council may wish to include a cross reference within this policy or its supporting text.	Noted, the policies have been comprehensively re-written.
GLA	DMP 8	The Council should also include a reference (either within this policy, or elsewhere in the document) to promoting urban greening and green roofs within major development proposals - to mitigate the urban heat island, and encourage a greater coverage of vegetated surface area.	Noted, the policies have been comprehensively re-written.
GLA	DMP 8	In continuing to refine the detail of this (and other policies) within this document, the Council is advised to expect the publication of the Mayor's draft revised Supplementary Planning Guidance on Sustainable Design and Construction, which will be available for public consultation between May and June 2013.	Noted.
GLA	DMP 9	Overall the objectives of this emerging policy are in line with the London Plan. GLA officers welcome the fact that the Council continues to develop the North London Waste Plan (NLWP) in partnership with other North London boroughs, and that existing waste sites will be safeguarded. The GLA looks forward to reviewing the NLWP in detail in due course.	Noted.
GLA	DMP 9	GLA officers welcome the recognition of the London Plan's targets on recycling and reuse of construction, excavation and demolition waste, and support the thrust of the emerging policies which are set out to achieve these targets	Noted, the detail of this will be contained in the North London Waste Plan.

Consultee	Policy	Summary	Council Response
GLA	DMP 9	<p>Little mention is made within this policy or other parts of the document with respect to freight. An approach to managing freight issues associated with development should be incorporated to ensure that new developments would minimise the impact of freight by ensuring that the design and layout of schemes make provision for delivery and servicing activity, and that construction logistics plans and delivery and servicing plans are produced in support of applications. The promotion of the Freight Operators Recognition Scheme and, where appropriate, the transfer of freight to rail and water is strongly encouraged. It is also important that cycle safety measures are enforced during construction, particularly in respect of construction vehicles being fitted with cycle specific safety equipment (including side-bars, blind spot mirrors and detection equipment to reduce the risk to cyclists on the capital's roads). The Council should encourage such measures to be secured in line with the London Freight Plan.</p>	Noted.
GLA	General	<p>7.20 In March 2012 the Mayor published his SPG on Geodiversity London's Foundations. Within this SPG (refer to pages 87 to 93) it is recommended that Haringey designates one Regionally Important Geological Site (Highgate and Queens Wood) and one Locally Important Geological Site (Coldfall Wood).</p>	Noted.
GLA	General	<p>7.20 Whist officers are of the view that the forthcoming Site Allocations document may be the most appropriate vehicle to deal with these designations, the Council should consider whether it would also be beneficial to have a development management policy to deal with any applications that may come forward at these two sites.</p>	Noted, the policies have been comprehensively re-written.
GLA	General	<p>7.23 In 2011 the Mayor undertook an update review on burial provision in London – this estimated that Haringey had less than ten years burial space left. As above, the Council is invited to consider associated designations within the forthcoming Site Allocations document, and whether an associated development management policy would be beneficial.</p>	Noted.

Consultee	Policy	Summary	Council Response
GLA	General	6.2 There is no mention in the document of providing public transport capacity and safeguarding land for transport. This can apply to transport infrastructure such as bus garages, transport interchanges and stations, as well protecting land for the future expansion of transport infrastructure. Whilst such uses and activities are protected by strategic policy, TfL would welcome a reference that the Council will have regard to the impact of development proposals in relation to the provision of transport facilities and infrastructure, and refuse proposals that conflict with London Plan policies regarding safeguarding land for transport. Reference could also be made to the need to protect land for schemes such as Crossrail 2.	Noted, land is safeguarded in the site allocations document.
GLA	General	6.7 As above, little reference is made to promoting the bus network, such as allocating road space, ensuring good access to stops, and implementing TfL's Accessible Bus Stop Design Guidance . The Council is encouraged to incorporate a reference to this accordingly.	Noted.
Haringey Cycling Campaign	DMP 17	HCC welcomes your intention to "encourage travel by public transport, cycling and walking" and generally to "promote sustainable methods of transport." A major requirement for cycling to be encouraged in the Borough, is safe easily accessible storage for bicycles. Many houses in Haringey have limited storage space and flat owners (and some house owners) have to contend with steps and stairs and have no access to a garden shed. Bicycle users, in particular younger and older users, need easy step free access. In view of this it is important that cycle storage in front gardens be allowed.	This is noted, and where appropriate and in keeping with amenity and other policies, cycle storage in front gardens would be permitted.

Consultee	Policy	Summary	Council Response
Haringey Cycling Campaign	DMP 17	The relevant section of the draft document is not helpful. It states:-"Cycle storage units within front gardens require planning permission and will also be required to be of a high quality design. Storage units should benefit from appropriate placement within the garden and screening to minimise the impact on the street scene." It is agreed that cycle storage (as any other front garden storage, such as bin stores, recycling containers, etc) should be of high quality design, however the requirement for planning permission is a major disincentive, as the cost and documentation is out of proportion to the scale of work needed. HCC propose that this section of the DMP be amended to read:- "In view of the contribution of cycling to sustainable travel, bike stores will be acceptable in front gardens, providing their design is of a high quality and complies with Council guidance, particularly in relation to appropriate placement within the garden and screening to minimise the impact on the street scene. The Council will not normally seek to enforce the legal requirement for planning permission to be obtained, except where a cycle store clearly does not comply with the Council's design guidance."	This is noted, and where appropriate and in keeping with amenity and other policies, cycle storage in front gardens would be permitted.
HFRA	DMP 10	Bearing in mind the need for urgent and drastic cuts in carbon emissions to avoid dangerous climate change, what comprehensive policies and practices need to be imposed on all housing development e.g. regarding energy usage and generation, materials, design, space, greenery and green space, recycling etc? Developers are rarely paying more than lip service to these critical issues. Policies need to be very carefully appraised and strengthened regarding environmental sustainability.	Policies are included on energy, materials, design, open space and recycling. There will be additional policies in these areas in the North London Waste Plan.
HFRA	DMP 18	How can we ensure that, in boroughs with serious land stress and competition, that all available land is earmarked for community needs - rather than for what developers can grab in order to make the most profit? Existing amenity land (e.g. for health services, education, and community facilities and services of all kinds) is being whittled away and sold off.	Land allocation is a delicate balance between many competing uses, the plan seeks to provide adequate community facilities through a multi-pronged policy approach.

Consultee	Policy	Summary	Council Response
HFRA	DMP 21	<p>In addition to the many omissions in this section, it should be noted that the reference in the Local Plan of a policy of reducing open space deficiency (6.3.20) has failed to translate in the draft DMP to any measures and criteria to achieve that, instead only referring to measures to 'prevent any further increase in open space deficiency'.</p> <p>The Consultation Question at the end is: Have we identified all the issues in relation to Open Space? Do you agree with how we are going to address the issues in relation to Open Space?</p> <p>Such questions are impossible to answer without an enormous effort to produce effectively a new and lengthy document.</p> <p>2.5 We request that Council planning officers check to ensure all the relevant policy points in the Local Plan are included in the draft DMP, and with the full details necessary to enable meaningful comment.</p>	The policies have been largely re-written, including more detailed policies on Open Space.
HFRA	DMP 3	Over-high housing densities – do they undermine the need to ensure sustainable communities? Current social and environmental infrastructure is inadequate to deal with the needs of current population levels, let alone greater/denser population levels. People are entitled to good quality living space and access to gardens etc. Do we really want to see a return to the failed tower blocks & estates of the past?	There is no policy supporting tower blocks. Housing densities are based on a number of factors, most notably the Housing Density Matrix in the London Plan.
HFRA	DMP 3	How do we ensure that every substantial residential development contributes effectively to improving public open spaces and recreational facilities of all kinds? How do we protect smaller, informal green spaces?	Some of the issues raised here are not planning policy problems. There are updated housing policies in the DM DPD.
HFRA	DMP 3	What can be done to respond to ever-increasing house prices, rents and insecurity? And could there be more effective action to prevent homes being left empty for long periods?	Some of the issues raised here are not planning policy problems. There are updated housing policies in the DM DPD.

Consultee	Policy	Summary	Council Response
HFRA	DMP 4	<p>'Affordable' and social housing: the failure to reach even the very modest % targets from new housing completions. Most so-called 'affordable' housing is well out of the reach of the vast majority of those who need it, and should be radically redefined. Social housing is currently the only genuinely affordable, permanent housing and should be the majority of new builds (it is only a tiny %). An additional point regarding Comments on DMP4 Balancing Housing Tenure, the terms used need to be clearly defined because in some recent developments such as Lawrence Road and Brook House they have been misleading: e.g.</p> <ul style="list-style-type: none"> - "Affordable" ?; - "Private" ?; - "Social rented" – does this mean "council and housing association rented homes for people on council waiting list"? - "Affordable rent or sale" – does this mean "shared ownership – half buy/half rent"? If not what does it mean? 	<p>Noted, definitions are contained in the relevant documents.</p>
HFRA	DMP 4	<p>Re Para 8: It is not "a high concentration of social rented housing" that leads to worklessness, poor educational attainment levels, crime and anti-social behaviour. Up until the 1980s Tottenham had high concentrations of council housing without these problems. The causes include the loss of jobs and increasing poverty due to deindustrialisation and national socio-economic policies. The tenor of this paragraph denigrates and discriminates against Council housing and those who live in it, and is arguably illegal under Equalities legislation (through indirect discrimination against people who are strongly represented among Council tenants e.g. those with disabilities and those from black and minority ethnic backgrounds).</p>	<p>Noted, much of this is relevant and has been included in the Tottenham Area Action Plan.</p>

Consultee	Policy	Summary	Council Response
HFRA	DMP 4	Re Para 12: In relation to redevelopments of existing homes the document says that there must not be a loss of housing and in particular no loss of family and affordable homes. Will this mean the same type of affordable homes? Why is there no Haringey policy to build council houses as some other local authorities are doing (see The Economist 27 April 2013)? http://www.economist.com/news/britain/21576674-social-housing-quietly-making-comeback-estate-mind	Noted.
HFRA	DMP 4	4.2.3 Do S106 agreements lead to actual planning gains? Community facilities and amenities of all kinds essential to sustainable communities (e.g. open spaces, children's' play areas, health, education, sports, leisure and meeting places, local shopping parades etc) are not only failing to be extended to address existing deficiencies, let alone the ever greater population pressures, but are under threat and being eroded on a daily basis in local neighbourhoods and town centres alike. No amount of S106 contributions (or contributions from the future Community Infrastructure Levy fund) can mitigate such real effects on the ground.	Community facilities are essential to sustainable communities, and are often secured through section 106, or CIL contributions.
HFRA	DMP 4	What can be done about the failure to ensure that new build housing contains enough family-sized housing, especially family-sized genuinely affordable and social housing? In Haringey policies recommend adequate 3-bed, and 4-bed units but only a tiny % gets built each year.	A family housing protection zone is introduced as part of a policy approach to provide family housing.
HFRA	DMP 4	How do we ensure that all new housing, including all 'affordable' and social housing, is designed to conform to accepted, good quality standards – and to the positive character and heritage of neighbourhoods? This relates to the interior and exterior of every home, including impact on and contribution to the street scene.	New design standards are included in the DM DPD.
HFRA	DMP 5	How do we halt the spread of Houses In Multiple Occupation? Homes are being divided into ever smaller units, causing not only loss of much-needed family	HMOs have specific policy guidance in the new version of the

Consultee	Policy	Summary	Council Response
		accommodation but also unacceptable over-crowding.	DM DPD.
HFRA	General	In the seminar the HFRA organised with LBH planning officers in April 2013, those (mostly experienced) community reps attending asked many searching questions - despite genuine and detailed responses from the officers present, there was still great confusion. How is this document further Guidance in most respects? What is the role of the highly-detailed SPDs? What if they are not mentioned in this document? Are we being expected to trawl through the Local Plan to identify all the issues which are not referred to in the draft DMP? Are we being expected to flesh out all the necessary details missing in the draft DMP?	Noted.
HFRA	General	We agree with the Our Tottenham network's submission to this consultation, that all plans, proposals, decision-making and developments should.... A. IMPROVE COMMUNITY FACILITIES: B. CONTRIBUTE TO DECENT AND AFFORDABLE HOUSING FOR ALL: C. PROTECT AND SUPPORT SMALL BUSINESSES: D. PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: E. IMPROVE THE STREET ENVIRONMENT: F. SUPPORT AND EXPAND YOUTH SERVICES AND FACILITIES: G. EMPOWER OUR COMMUNITIES: H. SUPPORT LOCAL COMMUNITY PLANS:	Noted, much of this is relevant and has been included in the Tottenham Area Action Plan.

Consultee	Policy	Summary	Council Response
HFRA	General	<p>Most of the above points echo the HFRA's own submission during the drafting of the current Haringey Local Development Framework / Plan in 2011. It was, and still is, the HFRA's view that the key objectives and policies of the Local Plan documents (including the one subject of the current consultation) should...</p> <ul style="list-style-type: none"> a. protect heritage and conservation features & the distinctive character of neighbourhoods b. resist unwanted over-development imposed on communities c. oppose over-intense housing development - densities have risen massively in the last few years, and there is a systemic failure by Councils and the GLA to enforce maximum density limits d. support genuinely affordable housing – the vast majority of housing development is unaffordable to local people in need. A scandalously low % of new homes completed in Haringey and London were social housing (the only genuinely 'affordable' housing), despite housing need being used as 'justification' for otherwise unacceptable policies. [See below for more comments regarding housing issues] e. protect valued 'backlands' sites f. defend open green space from development, especially undesignated sites g. address the widespread deficiencies of green open space of all kinds h. defend and expand children's play facilities in our neighbourhoods l. oppose poor project design j. defend community facilities e.g.. healthcare sites, local shops, post offices, meeting places, community pubs. Publicly-owned land is continuing to be widely sold off for private development. k. campaign against the sell off of ever more publicly-owned land l. halt the loss of affordable offices & sites for voluntary groups & small businesses m. protect front gardens - concerns include the quality of street scene, pedestrian safety, flooding etc n. resist environmentally unsustainable development – e.g. energy use, materials, design etc. A comprehensive low/zero-carbon energy programme (insulation, 	<p>Noted, some of the issues raised here are not within the remit of the local plan, others have had additional policy written in the redrafted version of the DM DPD.</p>

Consultee	Policy	Summary	Council Response
		<p>alternative energy generation, 100% recycling etc) is needed for every home, building and workplace throughout London</p> <ul style="list-style-type: none"> o. criticise increasing pollution - visual, air and noise p. campaign against the ever more illegal advertising hoardings and billboards q. remove street clutter r. implement effective traffic calming, 'living' streets & affordable public transport s. call for greater (not less) resources for maintenance and improvement of public facilities, buildings & services <p>3.7 The policies should be amended to reflect the above points and achieve the relevant objectives.</p>	

Consultee	Policy	Summary	Council Response
HFRA	General	As we stated in the 2011 consultation, and with ever greater force and resonance today, housing issues are purported to be central to planning policies. However, we believe the draft consultation document fails to get to grips with most of the key issues.	Noted, an additional regulation 18 consultation will be undertaken.
Highgate CAAC	DMP 10	f. DMP 10 Energy and Carbon reduction. We feel that while carbon reduction targets are required it must be recognised that solar panels if placed insensitively can damage a conservation area. Similarly there are considerable disadvantages to external insulation applied to listed buildings or those making a positive contribution to a CA.	Noted. DM12 supports the concern highlighted in the following response
Highgate CAAC	DMP 11	g. DMP 11 Heritage and Conservation. The policies listed are admirable but they MUST be enforced. The requirement on developers to preserve and enhance the character of the CA must not be regarded as 'motherhood and apple pie' but a statement of principle binding on all.	Noted, the policies are binding and enforceable.
Highgate CAAC	DMP 14	h. DMP 14 Basement development. The Council's Basement Development Guidance Note needs to be strengthened. The issues around hydrological problems and the stability of adjoining properties are too important to be glossed over. All applications involving a new or extended basement should provide full hydrological and hydro geological statements along with a basement impact assessment which includes details of how the impact of construction will be minimised. There is a strong case for introducing a borough-wide Article 4 direction removing permitted development rights in this area.	Noted. The re-worded policy on Basements, DM24 lays out the criteria and safeguarding required for the approval of basement development, including the need to have regard to local geological conditions. The Article 4 was based on an evidence base which indicated the need was greatest and justifiable in the wards highlighted in map 3.2.

Consultee	Policy	Summary	Council Response
Highgate CAAC	DMP 17	I. Other matters which we feel must be addressed. There are issues regarding crossovers and front garden parking which are important; hard standing in a front garden can dramatically alter the character of an road and should not be automatically permitted. The issue of wheelie bins in front gardens is potentially very damaging to a CA. much more so than cycle storage and should be addressed.	DM46 supports the concern highlighted by requiring a minimum of 50% soft landscaping in front gardens. The Sustainable Design and Construction SPD 8.1 provides guidance on the secure storage of wheelie bins. Some of the matters raised here are covered by permitted development rights which the Council cannot control.
Highgate CAAC	DMP 2	a. DMP 2; retail and town centres; the excessive presence of estate agents and other non-retail uses are as damaging in local shopping centres as they are in larger centres. This class of use should be limited in these areas to no more than 15 %. Various forms of food businesses should also be restricted to prevent local shopping centres being denuded of useful retail outlets.	DM53 recognises the essential need for a diverse range of retail development to provide customer choice. DM56 places restrictions on Hot Food Takeaways across the borough to improve health and wellbeing.
Highgate CAAC	DMP 5	b. DMP5 managing housing conversions. Conversions must be to a high standard if an area is not to be degraded. Extensions need particular care.	Noted. DM22 states that conversions can only be permitted if the proposal follows the included criteria, this includes extensions. There are also other design and heritage policies which manage conversions.

Consultee	Policy	Summary	Council Response
Highgate CAAC	DMP 7	c. DMP 7 Good Design and Quality of Life. The principles proposed are admirable but must be enforced. The need to protect Conservation Areas such as Highgate at risk from overlarge and ostentatious development is a key requirement. The character of the area should not be subject to change in this way.	Noted. The Council undertook an Urban Characterisation Study, identifies how the Haringey Local Authority visualizes the character of each area of the borough. It forms part of the evidence base for the emerging policies.
Highgate CAAC	DMP 7	d. Similarly the preservation of local views is of great importance; more could be included in the list proposed. Equally the Design panel must be strengthened and its views routinely taken into account by case officers.	Noted. Refer to DM6 which ensures the protection of important views and vistas in the borough illustrated in Map 2.3, and also Appendix A which lists the views and vista.
Highgate CAAC	DMP 9	e. DMP 9 Waste Demolition and Construction. The draft states that existing buildings should be conserved rather than demolished 'where feasible and sustainable'. The CAAC heartily endorses this policy and the requirement to justify all demolition should be applied with vigour.	Noted. Policy DM29 outlines the boroughs promotion of refurbishment and retrofitting, which aims "to achieve a minimum 'excellent' rating of the BREEAM Non-Domestic Refurbishment"
Highgate CAAC	General	Finally we would like to re-iterate that this draft has much to recommend it but will only serve the purpose for which it is intended if developers, local residents and others concerned are made forcefully aware that the policies contained here will be followed consistently and enforced rigorously if ignored.	Noted, the policies are binding and enforceable.
Joint CAAC	General	Concern over the lack of resources to implement and enforce policies, and the quality of development management functions in Haringey.	Noted, the policies are binding and enforceable.

Consultee	Policy	Summary	Council Response
Joint CAAC	General	Phased consultation rather than all at once.	Consultation has exceeded statutory requirements, see the consultation report at the front of this document.
Joint CAAC	General	Suggestion – policy to address Satellite dishes.	Noted. DM9 supports the concern highlighted in the following reponse
Joint CAAC	DMP 11	A4D – lack of management of the A4D areas, more awareness is needed among residents to ensure that these areas are maintained appropriately.	Noted, the policies are binding and enforceable.
Joint CAAC	DMP 11	Improved cross service working to ensure consistency between services in implementing and enforcing policies.	Noted, the services work together to ensure consistency. This is not informed by a planning policy document.
Joint CAAC	DMP 11	Windows – details of materials, and improved enforcement.	Design policies DM1 and DM2 state that new development must 'relate positively to neighbouring structures, new or old, to create a harmonious whole', along with 'distinctive local architectural styles, detailing and materials'.
Joint CAAC	DMP 11	Heritage driven regenerations/Design driven renewal.	Noted. DM13 supports the concern highlighted in the following reponse. Heritage assets will be utilised and historic environment must inform proposals. Design policies DM2 state that new development must 'distinctive local architectural styles, detailing and

Consultee	Policy	Summary	Council Response
			materials'.
Joint CAAC	DMP 15	Need for clear guidance which is properly implemented and enforced. A lack of intervention results in poor shop fronts in conservation and non-conservation areas.	Noted. DM7 makes reference to this concern, along with outlining requirements shopfronts and signage must adhere to.
Joint CAAC	DMP 15	A Heritage Champion is needed to ensure these policies are enforced.	Noted. English Heritage are the council's champion consultee along with dedicated Conservation and Design officers.
Joint CAAC	DMP 15	There have been cases that observations from the public have not been considered in determining planning applications. These available resources (i.e. the public) should be used more effectively.	Noted, the statement of community involvement describes the procedures for notifying the wider public of planning applications, and how representations should be considered.
Joint CAAC	DMP 15	Development should be sensitive to context and style – refer to 1998 UDP, good detail and see Westminster Conservation City Plan. Better enforcement is needed to implement the policies.	Noted. DM7 (B) supports the concern highlighted in the following reponse.

Consultee	Policy	Summary	Council Response
Joint CAAC	DMP 17	Front gardens and walls – policy should address issue of parking (car and cycle) in front gardens and how this impacts on walls, cross overs,	Noted. Refer to DM44 and DM45 which supports the concern highlighted in the following reponse.
Joint CAAC	DMP 22	Assessment needed of trees – for TPO, talk with Alex Fraser and Ian Holt. Assessing the need for need for replacement; allowing change of tree, most suitable types of trees; succession of trees.	Protecting Haringey's environment is a key issue within the borough, DM34 Environmental Protection sets out Haringey's position. TPOs are generally not part of a DM DPD.
Joint CAAC	DMP 7	Alterations should respect period and style. This should be clearly stated in conservation policy and link to relevant guidance.	Noted. Refer to DM2, which comments that 'development proposals are required to be appropriate to their locality'
Joint CAAC	DMP 7	Advertisements on street furniture, including lamp posts. A clear corporate direction is needed, Haringey to clean up the location and type of advertisements used. The use of video screens will become more common.	Noted. DM8 outlines a general criteria required for approval of advertisements. Some development is permitted and as such cannot be controlled by Council Planning Policy.
Joint CAAC	DMP 7	Advertisements on sides of buildings – more control. Idea for more relaxed approach for temporary advertisements, e.g. festivals and special occasions.	Noted. DM8 (Ab) outlines the criteria required for approval of advertisements
Joint CAAC	DMP 7	De-clutter parking adverstisements/notices, e.g. on pavements. Example, introduce more RPZ, reduce the need for yellow lines.	Noted. DM8 (Ad) outlines the criteria required for approval of advertisements

Consultee	Policy	Summary	Council Response
Joint CAAC	DMP 7	Streetscape – pavements – paving and materials – ensure that historical environment is fit for purpose, this can be done through an appraisal.	Generally permitted development and therefore not controlled by planning policy. Design policies DM1 and DM2 state that new development must 'relate positively to neighbouring structures, new or old, to create a harmonious whole', along with 'distinctive local architectural styles, detailing and materials'.
Joint CAAC	DMP 7	Public Realm policy – historic origin to be kept. See CABE guidance for wording to be included in policy.	Generally permitted development and therefore not controlled by planning policy. Design policies DM1 and DM2 state that new development must 'relate positively to neighbouring structures, new or old, to create a harmonious whole', along with 'distinctive local architectural styles, detailing and materials'.
Joint CAAC	DMP 7	Ensure the right materials for streetscape which can be replaced and reinforced – cross overs, street lamps, paving.	Generally permitted development and therefore not controlled by planning policy. Design policies DM1 and DM2 state that new development must 'relate positively to neighbouring structures, new or old, to create a harmonious whole', along with 'distinctive local architectural styles, detailing and

Consultee	Policy	Summary	Council Response
			materials'.
Joyce Rosser Tottenham CAAC	DMP 4	Para 2: Welcome commitment to 50% affordable housing on large sites and 20% on small (5-9 units) sites. Welcome commitment that affordable housing will be 70% social rented and 30% affordable rent or sale.	Further changes have been proposed in the latest consultation draft.
Joyce Rosser Tottenham CAAC	DMP 4	Para 5: Welcome commitment to have more social rented accommodation in the west of the borough.	Noted. Refer to Site Allocations DPD which outlines specific locations.
Joyce Rosser Tottenham CAAC	DMP 4	Para 8: It is not “a high concentration of social rented housing” that leads to worklessness, poor educational attainment levels, crime and anti-social behaviour but rather the loss of jobs due to deindustrialisation. Up until the 1980s Tottenham had high concentrations of council housing without these problems.	Noted. A new Tottenham Area Action plan has been developed, exploring topics addressed in this response.
Joyce Rosser Tottenham CAAC	DMP 4	Para 12: In relation to redevelopments of existing homes the document says that there must not be a loss of housing and in particular no loss of family and affordable homes. Will this mean the same type of affordable homes?	Noted. Refer to DM16 (c) 'resist the loss of all existing housing, including affordable housing...unless the housing is replaced with at least equivalent floorspace.' The 'Family Housing Protection Zone' further supports

Consultee	Policy	Summary	Council Response
			this policy.
Joyce Rosser Tottenham CAAC	DMP 4	<p>Why is there no Haringey policy to build council houses as some other local authorities are doing (see The Economist 27th April 2013)? http://www.economist.com/news/britain/21576674-social-housing-quietly-making-comeback-estate-mind Is there any way that buy to let landlords can be prevented for buying up private homes?</p>	Council house building is not within the remit of development managment. Policies on affordable housing are... The Council is currently not considering a policy to stop buy to let landlords and it is not clear that this could be achieved through planning policy.
Mario Patrou	General	<p>The consultation on the DMP is pointless or almost pointless as consultation has to be able to change the proposed outcome. As the DMP must conform to the London Plan's housing targets for Haringey it renders this costly exercise meaningless. It adds insult to injury to claim the process is evidence based when the housing target can't be changed. Can we have our money back? For example, the Local Plan Strategic Policies put thousands of pounds of Haringey money into the deep pockets of the Planning Inspectorate, yet even though it was adopted in March 2013 it states at 1.4.2 the population is expected to reach over 260,000 when the census 2011 shows we have already exceeded that estimate. I denounce the Local Plan, the DMD and the planning system.</p>	Noted, the Mayor's London Plan, has been subject to public consultation since 9th February for a period of six weeks. Independent Examination is a requirement for the adoption of planning policies under the Planning and Compulsory Purchase Act.

Consultee	Policy	Summary	Council Response
Natural England	Appendix 1	Appendix 1: On page 69, as part of Appendix 1, you provide a list of documents that may be used as additional guidance for those seeking to provide an additional statement on design. The use of the existing natural signature of the borough can be used to help deliver these design objectives. Natural signature refers to the underlying landscape of an area, which if drawn out, can make a direct and powerful contribution to „sense of place“ and local distinctiveness. Natural England has recently produced the London Landscape Framework which gives further guidance on the „natural signatures“ . We recommend you consider adding this document as a means of helping applicants to meet the design criteria. The London Landscape Framework can be found at: http://www.naturalengland.org.uk/regions/london/ourwork/londonnaturalsignatures.aspx	Noted.
Natural England	DMP 12	DMP 12 Environmental Protection (p36) We welcome the acknowledgement of the potential impact of light pollution on wildlife.	Noted.
Natural England	DMP 14	DMP14 Basement Development (p41) We are pleased that the policy acknowledges that such development should be done in such a way as does not harm trees or damage the natural environment.	Noted.
Natural England	DMP 18	DMP 18 Managing Provision of Community Infrastructure (p51) We would like green infrastructure to be added to the list of examples of infrastructure that can be funded through CIL or S106 agreements on p52.	Noted, the Green Link has also been included.

Consultee	Policy	Summary	Council Response
Natural England	DMP 21	<p>DMP21 Open Space</p> <p>Whilst we welcome the importance given to safeguarding open space in this policy, we do have a number of suggested improvements to the policy as follows:</p> <ul style="list-style-type: none"> · we recommend you add wording asking for developers to ensure that there is open space available in accordance with the ANGSt Standards for accessible natural greenspace. More information about these standards can be found at http://www.naturalengland.org.uk/regions/east_of_england/ourwork/gi/accessible_naturalgreen_spacestandardangst.aspx 	<p>The London Borough of Haringey has since completed an Open Space and Biodiversity Study, which sets an open space standard for the borough.</p>
Natural England	DMP 21	<p>The policy should also include a direct reference to the importance of new developments contributing towards green infrastructure provision. It would also be helpful if the glossary included a definition of “Significant Local Open Land” as it is unclear what this category of land includes.</p>	<p>Noted, this has been included in the Policy. The Glossary has been updated.</p>
Natural England	DMP 22	<p>DMP22 Nature Conservation</p> <p>Natural England welcomes the following aspects of this policy: the promotion of biodiversity as part of development proposals is to be welcomed, in accordance with paragraph 118 of the NPPF. However, we would like to see this policy strengthened as follows:</p> <p>We would like to see a slightly amended version of the alternative policy wording, as considered in the Interim Sustainability Appraisal, included in this policy as follows, “Development will not be permitted on or adjacent to designated sites for nature conservation, other than in exceptional circumstances”.</p>	<p>The entire policy on Nature Conservation has been re-written, the new wording more closely aligns the position put forward in this submission.</p>

Consultee	Policy	Summary	Council Response
Natural England	DMP 22	<p>We are concerned that as currently written the policy does not outline the criteria which would need to be met to allow development on designated sites. The suggested wording above would in our view ensure the proposal was compliant with the NPPF from both an environmental and economic perspective. If the wording is kept as it is the policy will need to ensure adequate mitigation measures are provided where an adverse effect on a designated site is likely. Also the criteria which would need to be met to allow development on designated sites would need to be outlined in the policy. We would like to see a stronger reference in this section to the role of development in establishing coherent ecological networks within the blue box section entitled “How can this policy achieve its aim”, in accordance with paragraphs 109 and 117 of the NPPF, which state: 109 The planning system should contribute to and enhance the natural and local environment by... minimising impacts on biodiversity and providing net gains in biodiversity where possible..., contributing to the Government’s commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and 117. To minimise impacts on biodiversity and geodiversity, planning policies should: ... promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets.</p>	<p>The entire policy on Nature Conservation has been re-written, the new wording more closely aligns the position put forward in this submission.</p>
Natural England	DMP 7	<p>DPM7 Good Design and Quality of Life (page 24) We welcome the proposed protection for local views and vistas, as they can form an important part of townscape and landscape character.</p>	<p>noted, the policy DM6 now has more guidance on local views and vistas, and the Appendix A lists these views.</p>
Natural England	DMP 8	<p>DPM8 Sustainable Development and Climate Change (p 27) We welcome the requirement for a sustainability statement to be submitted with all planning applications except “householder development”.</p>	<p>Noted.</p>

Consultee	Policy	Summary	Council Response
Natural England	SA	<p>Natural England's comments on the Interim Sustainability Appraisal (March 2013). Page 3 of 3</p> <p>As outlined in our previous response dated 03 August 2012, Natural England broadly supports the approach adopted by the Council. However we do have a number of concerns as follows:</p> <p>We do not agree with the recommendation in the report which deals with the alternative policy of not permitting development on or adjacent to designated sites for nature conservation. It is our view that the proposed wording could be changed as outlined in our response above to ensure it is compliant with the NPPF from both an economic and environmental perspective.</p>	Noted.
Natural England	SA	<p>It would be helpful if the Section on Sustainability Issues and Objectives (Section 5.1) highlighted some of the environmental issues facing the borough with respect to biodiversity and landscape in a little more detail. As currently written the section is more heavily weighted to objectives rather than existing environmental issues which need to be addressed.</p>	Noted, additional detail has been included on sustainability issues.
NLWA	DMP 1	<p>The Authority supports the Council's proposals to safeguard land for employment/ business use, to facilitate local job opportunities and to ensure new local employment and skills generation will be generated as a result of development. The Authority considers that some aspects of this policy should be strengthened to give further protection to employment land. There is significant residential development identified in the Haringey Local Plan. Given the increasing need for local employment in Haringey, in particular as the population of the area increases and given the pressures on employment land for other uses, the Authority supports the retention of employment land for employment uses but considers that this DMP needs to be strengthened and thereby increase the protection for employment land. In particular, the Authority considers that the policy should be clarified to ensure that DEA sites may, subject to local assessment of potential environmental and community impacts, be used for a full range of employment uses, including industrial activities (B1c / B2 and equivalent</p>	<p>Support for the proposal to safeguard land for employment and business uses is noted. The updated employment policies provide greater certainty and policy detail on employment land uses, and DM49 provides clarity around maximising the use of employment land sites. DM50 provides clarity on facilitating site regeneration and renewal for employment sites.</p>

Consultee	Policy	Summary	Council Response
		sui generis uses).	
NLWA	DMP 1	<p>The Authority wishes to emphasise the importance of clarifying the policy so that sui generis uses which are equivalent to B class uses are explicitly supported within employment areas. Many waste operations can operate within enclosed buildings in a way which present no greater or different risks of impacts to the local environment and community than conventional B1c or B2 uses. Since waste uses are essential community infrastructure, the Authority considers that no artificial barriers should be erected to prevent or frustrate waste and other similar sui generis developments of an appropriate scale and design.</p>	<p>Sui generis uses, are by definition, unique. Development proposals for sui generis uses will be required to demonstrate the likely impact on the local environment and community, and the planning application will determine the appropriateness of any sui generis use on a relevant site. Haringey's comprehensive Local Plan presents sound and clear planning policy and does not propose any barriers to appropriate developments within the borough.</p>
NLWA	DMP 10	The Authority considers that the Council has identified all the issues in relation to energy and carbon reduction.	Noted.

Consultee	Policy	Summary	Council Response
NLWA	DMP 10	<p>The Authority is concerned that any requirement for carbon emissions reduction is achieved in the most economically efficient manner possible, subject to there being evidence that a solution is verifiable and additional. Therefore the Authority considers that where on-site provision is not feasible or would be uneconomic, the policy should support consideration of the widest possible variety of offsetting options. This could include measures such as reductions in unregulated energy use, net reductions across a portfolio of sites, or “contracting out” to a third party to deliver equivalent carbon emissions reductions. Where such options are economically more efficient (i.e. have a lower £/tonne CO2 saved) than the carbon price which might be set by the Council for its Carbon Offset Fund, and where the developer can provide evidence of verifiability and additionality, these options should be supported and readily agreed by the Council.</p>	<p>The Authority's position on carbon is noted. The 2015 version of the DM DPD presents Policy DM28 which provides for allowable solutions to meet required CO2 reductions either near or off site, and/or a financial contribution to be secured through a section 106 agreement.</p>
NLWA	DMP 13	<p>The Authority considers that issues affecting tall and large buildings within employment and industrial areas have not been considered or addressed in the consultation document. The document instead appears to be focused only on tall residential schemes or developments within residential and mixed use neighbourhoods. The document also simplistically divides all tall and large buildings into “landmarks” and “eyesores” when in practice many tall and large buildings are neither, but instead are either out of view or to blend into the backdrop of a streetscape.</p>	<p>The 2015 version of the DM DPD has a more sophisticated approach to tall and large buildings, which has been informed by an Urban Characterisation Study. Locations appropriate for tall and large buildings have been identified. Tall buildings are defined as those which are "substantially taller than their neighbours, have a significant impact on the skyline, and are of 11 storeys and over". Buildings which are out of view or blend into the backdrop of a streetscape are unlikely to be considered tall or large by this refined definition.</p>

Consultee	Policy	Summary	Council Response
NLWA	DMP 13	The Authority is concerned that the way the issue has been framed will lead to unreasonable and disproportionate design quality requirements on tall and large employment and industrial buildings irrespective of their purpose or setting.	The 2015 version of the DM DPD has a more sophisticated approach to tall and large buildings, which has been informed by an Urban Characterisation Study. Locations appropriate for tall and large buildings have been identified. Tall buildings are defined as those which are "substantially taller than their neighbours, have a significant impact on the skyline, and are of 11 storeys and over". This definition, and the reasoned justification for policy DM5 reframes the discussion on taller buildings, and illustrates the clear relationship between buildings and their purpose and setting.

Consultee	Policy	Summary	Council Response
NLWA	DMP 13	<p>The Authority does not agree with the policy approach in relation to tall/large buildings so far as they concern development within employment and industrial areas. The Authority proposes that restrictions on tall buildings in employment areas should be by exception and only where there is clear evidence of harm to adjacent areas or defined longer distance views. The policy should be flexible, such that it allows the use of “shoulders” within employment areas to allow higher buildings within such areas which step down towards the edges. Unreasonable and/or disproportionate requirements on the form of buildings in employment areas, could significantly compromise the Borough’s ability to generate more local employment, leading to conflict between the implementation of draft policy DMP13 and policies DMP1 and DMP20.</p>	<p>The 2015 version of the DM DPD has a more sophisticated approach to tall and large buildings, defining tall buildings as those which are “substantially taller than their neighbours, have a significant impact on the skyline, and are of 11 storeys and over”. The borough has undertaken an employment land review to identify likely needs for employment uses in the borough, and has not identified a conflict between the policies for taller buildings and delivering employment land.</p>

Consultee	Policy	Summary	Council Response
NLWA	DMP 13	<p>All designated industrial and employment areas should be considered generally suitable for tall and large buildings, with specific exceptions to this general presumption being identified on a site by site basis and only where evidence can justify an exception. Exceptions would include where residential or other sensitive uses are immediately adjacent to such sites. The Authority notes that its comments above relating to policies DMP21 Open Space.</p>	<p>The 2015 version of the DM DPD has a more sophisticated approach to tall and large buildings, and has identified locations for buildings which are "substantially taller than their neighbours, have a significant impact on the skyline, and are of 11 storeys and over" through the use of an Urban Characterisation Study, which forms part of the evidence base for the DM DPD. The borough has undertaken an employment land review to identify likely needs for employment uses in the borough, and has not identified a conflict between the policies for taller buildings and delivering employment land. The borough also recognises that development on sites adjacent to open space can have an impact on the open space.</p>
NLWA	DMP 18	<p>The Authority notes that the Council's Community Infrastructure (CIL) Charging Schedule is currently being developed and that as part of this process, the Council will set out the infrastructure projects that can be funded from CIL revenues. However, the Authority proposes that DMP18 is amended to recognise that waste developments are community infrastructure and therefore CIL receipts may be able to be used to fund investments in such infrastructure and that investments in waste developments should be offset against CIL obligations in new development.</p>	<p>Haringey's CIL Charging Schedule was adopted after public examination by an independent inspector. Representations were invited on the the development of that document, and that is the appropriate forum for representations and discussions</p>

Consultee	Policy	Summary	Council Response
			regarding CIL.
NLWA	DMP 18	<p>The Authority considers that waste facilities provide a community benefit as they are essential for the sustainability, health and amenity of a local area. Waste facilities are therefore essential community infrastructure and there is a demonstrable need for new facilities in north London. Therefore, such facilities should be recognised as a valid recipient of CIL receipts.</p>	<p>Haringey's CIL Charging Schedule was adopted after public examination by an independent inspector. Representations were invited on the the development of that document, and that is the appropriate forum for representations and discussions regarding CIL.</p>
NLWA	DMP 18	<p>The other point to the Authority would make is that if CIL includes a decentralised energy network, then the additional payment which might be levied in relation to carbon reduction targets under draft DMP10 should be credited against any CIL payment. Otherwise, then the Council may inadvertently double-charge for carbon offset payments.</p>	<p>Haringey's CIL Charging Schedule was adopted after public examination by an independent inspector. Representations were invited on the the development of that document, and that is the appropriate forum for representations and discussions regarding CIL.</p>

Consultee	Policy	Summary	Council Response
NLWA	DMP 20	The Authority supports the objective of ensuring access to local residents and business of local employment opportunities. However, any policy requirement must be framed in a way which does not fetter the legal requirement of employers to provide access for all candidates to employment opportunities. It is also concerned that policy is not used to impose additional burdens on employers which are not consistent with the nature of the activity. Therefore the Authority supports requirements for actions such as local advertising or local job fairs. The Authority does not support requirements related to securing places for trainees or making financial contributions in lieu, which reach into matters which are internal to the operation of business and other employment uses.	Noted, requirements for matters which are internal to the operation of business, which are not related to planning, have not been included in the 2015 version.
NLWA	DMP 21	The Authority has identified three points which it believes should be addressed within the final policy and/or supporting text: - First, the Authority is concerned to ensure that employment uses within designated industrial and employment areas are not normally brought within the requirement to provide open space to overcome existing deficiencies. Such areas should be preserved as far as possible for their primary purpose.	Noted, in situations where multiple designations occur on a site, a balanced approach to development would be expected.
NLWA	DMP 21	Second, the policy should be clear on the scale of development to which a requirement for open space provision will be applied and it should be clear on how the reservation of land for open space relates to CIL payments which would be used to provide green infrastructure for the borough.	The 2015 policies, in combination with the CIL charging schedule, provide clarity on how payments for infrastructure within the borough are made.

Consultee	Policy	Summary	Council Response
NLWA	DMP 21	<p>Third, the Authority is concerned that where MOL and other designated open space is located adjacent to employment land (as occurs in a number of locations within the borough), the policy is reasonable and proportionate in how it seeks to protect the amenity and openness of such adjacent land. In many cases large or tall buildings can be located adjacent to open space in a way which has no material impact on the open space, and can even enhance the quality of such open space by framing views into and across such space. The Authority would be concerned if the policy were applied to impose a blanket restriction on the height or massing of industrial or employment developments simply because they were located adjacent to open space.</p>	<p>Development is generally required to demonstrate the impact it will have on the surrounding amenity, and this includes buildings adjacent to open space. A blanket ban on particular buildings adjacent to open space has not been including in the 2015 version of the document.</p>
NLWA	DMP 22	<p>The Authority notes that the evidence base for nature conservation designations is out of date for many sites across the borough. Where surveys have not been carried out in the past 2-3 years, nature conservation sites should be re-surveyed and the designations reappraised for accuracy.</p>	<p>In 2014 the Borough completed the Open Space and Biodiversity Assessment which surveyed many sites within the borough for their biodiversity or open space value. This document forms part of the evidence base for the policy documents and is publicly available.</p>

Consultee	Policy	Summary	Council Response
NLWA	DMP 22	<p>The Authority supports the policy intention but would draw attention to situations where a balance between appropriate development and nature conservation may need to be struck. This particularly applies to sites which have multiple designations covering both employment and nature conservation objectives. The Authority considers that biodiversity offsetting can provide a rigorous and fair means of enabling this balance to be struck and therefore its use should be supported in the policy. Biodiversity offsetting is widely used in other countries and is now the subject of a Defra pilot programme (see https://www.gov.uk/biodiversity-offsetting). Defra, Natural England and local councils in 6 pilot areas are working together to test the biodiversity offsetting approach and guidance is available about the approach on the Defra website at the link above.</p>	<p>There are many instances when a balance needs to be found between nature conservation and appropriate development. The London Borough of Haringey currently favours an approach of mitigation of the effects of development rather than offsetting, and notes that the current biodiversity offsetting pilots and schemes (Devon, Doncaster, Essex, Greater Norwich, Nottinghamshire, Warwickshire, Coventry and Solihull) have vastly different characteristics to a London Borough such as Haringey.</p>
NLWA	DMP 7	<p>Broadly the Authority considers that the supporting text for this policy identifies all the issues in relation to the principles of good design and quality of life. However, the Authority considers the supporting text and the policy itself should recognise that design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development. For instance, the Authority considers that for industrial employment facilities set within designated employment and industrial areas greater emphasis should be placed on supporting their potential to generate employment and ensuring that they do not give rise to adverse local environmental impacts. Good functional design will be appropriate in such locations and the policy should be applied flexibly and should not be used to impose onerous and costly requirements on such developments.</p>	<p>The 2015 version of the document introduces a Haringey Development Charter, against which planning applications will be assessed. This includes making a positive contribution to a place, relating positively to neighbouring structures, and incorporating sustainable design and construction principles. Appropriately this applies to employment facilities in industrial areas, where both good functional design, and the principles above,</p>

Consultee	Policy	Summary	Council Response
			are necessary.
NLWA	DMP 7	Waste facilities in particular should be recognised as essential community infrastructure ultimately funded by local taxpayers, where the emphasis should in most cases be on a functional design which protects amenity and the local environment rather than on “iconic” but typically more costly schemes.	Appropriately, all planning applications will be required to address the Haringey Development Charter, as set out in DM1. Early engagement with the Council is an important part of the design process. The reasoned justification of policy DM1 outlines this process and this process would inform the appropriate design standards for all facilities including those for waste.

Consultee	Policy	Summary	Council Response
NLWA	DMP 7	<p>The Authority is concerned that the very broad proposal to protect views within the Lee Valley could lead to restrictions on the height and massing of industrial buildings within this very important industrial and employment corridor, or could lead to onerous design quality requirements which are not proportionate or reasonable in the context of a designated employment area. Accordingly the Authority recommends that such a policy be made more precise as to the particular views to be protected and that such protection does not seek to fetter the reasonable requirements for tall and large buildings within existing designated employment and industrial areas.</p>	<p>The 2015 version of the DM DPD contains more detailed design policies and policy DM6 on Locally important views and vistas. This, when read in conjunction with Appendix A of the DM PD is quite precise as to the particular views which are required to be protected. Any potential development would only be affected by the existence of a view corridor if the development was tall enough to impinge upon the corridor, in many circumstances the particular land use (eg industrial or employment) does not affect the importance of the view.</p>
NLWA	DMP 9	<p>The Authority is supportive of this draft policy and supports the retention of existing waste sites in particular. However, on a point of accuracy the London Plan apportionment figures for Haringey total 239,000 tonnes by 2031, not the 237,000 tonnes quoted, so more waste needs to be managed in Haringey than the consultation draft development management policies consultation document suggests. This figure is 9% higher than the 2011 apportionment and therefore relies upon additional capacity being created.</p>	<p>This is noted, the more appropriate place for the discussion of waste apportionment is the London Plan and the North London Waste Plan.</p>
NLWA	DMP 9	<p>The Authority supports measures which help to reduce waste arisings and to encourage reuse and recycling. The Authority therefore supports this policy approach, subject to it being applied flexibly so that reporting requirements for each development are proportionate and reasonable.</p>	<p>This is noted, the more appropriate place for the discussion of waste is the London Plan and the North London Waste Plan.</p>

Consultee	Policy	Summary	Council Response
NLWA	DMP 9	<p>The Authority notes that most demolition is permitted development under Part 31 of the General Permitted Development Order (GDPO) and therefore policy should not seek to fetter or undermine the rights provided in the GDPO. Furthermore, the Authority considers that if an existing building is not protected (e.g. is not a 'listed' building) and if a proposed new development is appropriate and well designed, a requirement to justify demolition which is necessary to enable such development would not be reasonable. The Authority therefore considers that policy should focus on ensuring that material arising from demolition is reused or recycled as far as possible.</p>	<p>The 2015 version of the DM DPD does not have a requirement for the demolition of non listed buildings outside of conservation areas to provide justification. The re-use of a building is usually a more sustainable option, however there are often other factors requiring consideration and the 2015 version of the document is therefore mostly silent on this issue.</p>
Our Tottenham	General	<p>4. Specifically, all plans, proposals, decision-making and developments in Tottenham should...</p> <p>A. IMPROVE COMMUNITY FACILITIES: B. CONTRIBUTE TO DECENT AND AFFORDABLE HOUSING FOR ALL: C. PROTECT AND SUPPORT SMALL BUSINESSES: D. PROMOTE QUALITY DESIGN AND RESPECT FOR HERITAGE: E. IMPROVE THE STREET ENVIRONMENT: F. SUPPORT AND EXPAND YOUTH SERVICES AND FACILITIES: G. EMPOWER OUR COMMUNITIES: H. SUPPORT LOCAL COMMUNITY PLANS:</p>	<p>The DM DPD broadly contains policies for community facilities, affordable housing, business, design and heritage and community facilities. The Tottenham Area Action Plan, specifically contains policies which are relevant to realising the aspirations of the community of Tottenham, including area wide policies and site allocations.</p>
Outdoor Media Centre	DMP 16	<p>The last sentence of the first para, 'Advertisements that are well constructed...' has no main verb and makes no sense. In the 'How can we address these issues' box, why have the council picked on 'hoardings, illumination of hoardings..' as examples of advertisements (and why not petrol station signs, bus stop signs, supermarket signs' etc)? It makes no sense, since the para properly refers to all advertisements. Everything in brackets should be</p>	<p>Noted, the 2015 version of the DM DPD has been updated to provide more coherent and detailed policy on advertisements.</p>

Consultee	Policy	Summary	Council Response
		deleted.	
Outdoor Media Centre	DMP 16	There is an error in the para beginning 'The display of most advertisements...'. The current regulations are the Town and Country Planning (Control of Advertisements) (England) Regulations 2007. It is also a fact that all advertisements require consent under these Regulations, although most are excepted from control or granted deemed consent.	Noted, the 2015 version of the DM DPD has been updated to provide more coherent and detailed policy on advertisements.
Outdoor Media Centre	DMP 16	Part of the first paragraph of the section headed 'Amenity' makes unfounded assumptions which do not accord with Government policy advice. We would draw your attention to para 11 in Appendix E to the Annex to DCLG Circular 03/2007. This makes clear that not all poster panels on building flank walls 'tend to distort the scale and architectural unity of buildings', as implied in this para. We therefore consider that this sentence should be amended to reflect more closely the advice in the DCLG circular. The final sentence of this paragraph makes no sense and is, anyway, unnecessary since it states the obvious.	Noted, the 2015 version of the DM DPD has been updated to provide more coherent and detailed policy on advertisements.
Outdoor Media Centre	DMP 16	The last sentence of the 'Public safety' paragraph is incorrect. The Highways Authority (whether Haringey or TFL) should be consulted on the impact of any advertisement which might create public safety problems, not just 'hoardings'.	Noted, the 2015 version of the DM DPD has been updated to provide more coherent and detailed policy on advertisements.

Consultee	Policy	Summary	Council Response
PWA	DMP 1	The hierarchy of Defined Employment Areas lists 'recycling facilities' among protected B uses for Strategic Industrial Land. Since the London Plan 2011 states at Section 5.82 that "It is envisaged that land in strategic industrial locations will provide the major opportunities for locating waste treatment facilities", PWA suggests that SIL be expanded to include 'and other waste' after 'recycling' and before 'facilities'.	The policy wording and order has been significantly altered since the 2013 version of the policies were consulted on, so it is not possible to include this suggested change verbatim. This hierarchy is a summary reflecting the Strategic Policy document.
PWA	DMP 1	On page 10, the end of the first paragraph, 'where the borough is', has been left hanging. This sentence needs to be completed. PWA does not understand the relevance of the last paragraph in the policy "We also need to make provision for employments opportunities related to new development in the borough. Policy DMP 21 sets out our approach to this." DMP 21 deals with Open Space, and PWA cannot see the connection.	Noted, the policies have been comprehensively updated since 2013.
PWA	DMP 10	DMP 10 – Energy and Carbon Reduction PWA draws the Council's attention to the comment on p 27 of the LBH Carbon Commission 40:20 report 2012: "The current North London Waste Authority procurement is moving in the wrong direction. The focus is on energy from waste and co-mingling and should be switched to increasing re-use and up-cycling so as to maximize resource recovery and job creation" Perhaps it might be helpful to make some reference to the existence of the LBH Carbon Commission 40:20 Report in this section of the DMP.	Noted, the 2013 version of the document has been significantly updated, and the policies relating to Carbon are much more detailed. Chapter four of the 2015 version of the DM DPD contains more information.
PWA	DMP 12	PWA feels that the policy aim to 'include appropriate environmental protection' is nebulous, and too subject to equivocation. It feels that 'appropriate' should be substituted by a concept that is firmer and simpler, such as 'the highest quality/calibre'.	The 2015 version of the DM DPD contains much more stringent and detailed policies on environmental protection.

Consultee	Policy	Summary	Council Response
PWA	DMP 12	<p>In answer to the first question – ‘Have we identified all the issues?’ - PWA feels that it is important to clarify a) what is meant by ‘mitigation’, a central issue in environmental protection and b) the limits of what ‘mitigation’ can achieve. Too often ‘mitigation’, the lessening of environmental impact, is used when the speaker actually means ‘compensation’, which PWA takes to mean such things as the planting of new young trees to replace mature trees that have been destroyed, or the moving of protected species elsewhere – in other words the profound disruption of an existing habitat which has evolved over time as a result of a very specific combination of factors and a wholly uncertain attempt to recreate it elsewhere. This does not mean a zero loss of habitat. In one case, the proposal for ‘preservation by record’ of ancient hedgerows that were to be uprooted was actually described by the developer as ‘mitigation’!</p>	<p>This is noted, there are several approaches to "mitigation", which could include on site and potentially off site, and the current version of the document contains more detail than the 2013 version, however it is difficult to be too prescriptive given the wide range of situations which may require mitigation.</p>
PWA	DMP 12	<p>In PWA’s view, if a nature conservation site is lost, the physical acreage is sacrificed; it may or may not be possible to replace that – in Haringey more likely the latter. What is irreplaceable is the fact that the site, taken as a whole, is greater than the sum of its parts, since their interdependence adds an extra and indefinable layer which is very difficult or impossible to recreate elsewhere. An additional point is that, the longer a nature conservation site has taken to develop, the harder it is to mitigate any damage to it and the longer any mitigation exercise elsewhere will take to make any meaningful balancing contribution once the site has been lost. This is especially so in the case of the loss of trees, in relation to which PWA notes the emphasis given in DMP22.</p>	<p>This is noted, the environment protection policy DM25 in the 2015 version of the DM DPD provides some detail around mitigation, further details would be the subject of planning applications and approvals.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 12	<p>PWA trusts that the Council's Project Officer (Nature Conservation) would be fully involved in assessing mitigation proposals in any development. The Council's assurance on this point would be appreciated.</p> <p>In relation to 'impacts', the Council should clarify whether or not it includes 'odour' within its definition of 'air quality'.</p>	<p>Haringey doesn't have specialist definition for "air quality" but notes that the Mayor's Air Quality Strategy defines air pollution as "Air pollution refers to substances in the air which directly affect human health, welfare, plant or animal life. Air quality is measured in terms of concentrations – the amount of a pollutant that is present in the air". Comments on planning applications are requested from all relevant officers.</p>
PWA	DMP 13	<p>DMP 13 – Tall and Large Buildings</p> <p>PWA suggests that wording should be added that 'Sites adjacent to MOL are unsuitable for tall or large buildings', and refers the Council to its comments about protection of views.</p>	<p>The 2015 version of the DM DPD includes a much more nuanced approach to taller buildings, this has been informed from the Urban Characterisation Study which now forms part of the evidence base.</p>
PWA	DMP 14-20	<p>DMP 14-20</p> <p>PWA supports the general approach but reserves comments until it has seen the final policy wording.</p>	<p>Noted.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 21	In the purple box the Council refers to “Significant Open Land or any other valuable open land”, and later in the same box refers to Significant Local Open Land. In the Fact Box later in the policy, it gives no definition of any of these terms, but simply defines Open Space. Planning is confusing for the public at the best of times, and for better public accessibility to this document, PWA suggests that SOL and SLOL be defined. It is also concerned that the term ‘valuable open land’ is too subjective to be used as a properly definable term, and should be deleted.	Noted, a definitions page has been included in the 2015 version of the DM DPD. The Open Space and Biodiversity Study 2014, which is used as part of the evidence base, contains additional information on the different types of open space.
PWA	DMP 21	PWA is concerned that this policy only addresses the future of open space that is designated. Thus some parks, ancillary open space, even back gardens are left in a planning limbo.	The open space policies in the 2015 version of the document have greater clarity around open spaces.
PWA	DMP 21	The purple box states the criteria to be met if development is contemplated on SLOL. However, the following Policy, DMP22, says simply that development ‘should be avoided’ on SINC’s, which by definition on p57 count as SLOL. This is a significant weakening of protection, and means that these two policies are contradictory. The Inspector amended SP13 to read: “The Council will not permit development on SINC’s and LNRs unless there are exceptional circumstances and where the importance of any development coming forward outweighs the nature conservation value of the site and appropriate mitigation measures are provided. In such circumstances, or where a site has more than one designation, appropriate mitigation measures must be taken, and, where practicable and reasonable, additional nature conservation space must be provided. Each case will be looked at on its merits, having regard to all material considerations” It is stated on p 57 that ‘It is important that open space is accessible to all those in the immediate locality’. However, in the final para of p 57, two of the qualities needed for something to be described as Significant Local Open Land, ‘biodiversity’ and ‘landscape’, are not predicated on accessibility, in contrast to the other two, ‘amenity’ and ‘recreational’, which plainly are. This again seems	The lack of clarity on this issue is noted. The 2015 version of the document contains a more refined policy approach to open spaces.

Consultee	Policy	Summary	Council Response
		contradictory.	
PWA	DMP 21	<p>PWA makes the following further suggestions:</p> <p>a) that the very first wording in the purple box, “Development that is adjacent to..” should be amended to read “Development that is adjacent to, or on...”</p> <p>b) in the Fact Box, the definition of Green Chain/ Link should be amended to include ‘railway land’, which after all goes a significant distance through the borough.</p>	<p>The policy wording and order has been significantly altered since the 2013 version of the policies were consulted on, so it is not possible to include this suggested change verbatim. A definition for Ggreen Chain is included in the 2015 version of the document.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 22	<p>DMP 22 – Nature Conservation</p> <p>In his report on the Local Plan: Strategic Policies, the Inspector for Haringey amended the policy in SP13 to read that development would not be permitted on SINC's unless there were 'exceptional circumstances' - see comments in DMP 21 above. DMP 22 says simply that development 'should be avoided', which is a significant weakening. Development Management Policies are not permitted to establish policies which are not already in the Local Plan: Strategic Policies, nor are they intended to weaken or remove policies in the Local Plan: Strategic Policies. It is therefore suggested that the words 'should be avoided' be deleted, and replaced by 'will not be permitted'.</p>	<p>The policy wording and order has been significantly altered since the 2013 version of the policies were consulted on. The policy guidance on nature conservation and open space in the 2015 version of the document is consistent with the hierarchy of open space and the National Planning Policy Framework.</p>
PWA	DMP 22	<p>The Council should remember that weakening protection on SINC's weakens protection for all 60 SINC's in Haringey. It draws the Council's attention to Section 1.7 of the Interim Sustainability appraisal, March 2013, 'Proposed Mitigation Measures':</p> <p>"Whilst the need for appropriate mitigation measures is identified in several of the Development Management Policies, for example DMP12 Environmental Protection, the appraisal did identify some policies where the requirements for mitigation could be strengthened and more clearly identified, in particular DMP21 Open Space and DMP22 Nature Conservation. The proposed mitigation measures will therefore be reviewed in the next iteration of the SA."</p>	<p>The policy guidance on nature conservation and open space in the 2015 version of the document is consistent with the hierarchy of open space and the National Planning Policy Framework.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 22	<p>PWA makes the following suggestions:</p> <ul style="list-style-type: none"> • P60, para 1, 1st sentence – after ‘circumstances’, insert ‘and the benefits of the proposed development outweigh any disbenefits’ (Inspector’s Report, 6.3.23) • P60, para 1, line 5 – after ‘measures will need to be identified’, insert ‘and evidence of proposed alternative provision, its deliverability and long term compensatory benefits must be provided as part of any planning application.’ • P60, para 2, Line 2 – delete ‘appropriate’, insert ‘full’. 	<p>The policy wording and order has been significantly altered since the 2013 version of the policies were consulted on. The policy guidance on nature conservation and open space in the 2015 version of the document is consistent with the heirarchy of open space and the National Planning Poilcy Framework, however additional comment on the current wording is welcomed through future consultation exercises.</p>
PWA	DMP 22	<p>At the end of p 60, para 1, the statement ‘submission of evidence to show that compensation has been implemented successfully’ is confusing. Does the Council mean solely that a developer needs to show that that a scheme accepted as compensation has simply been implemented, or to provide evidence that the scheme, once implemented, has provided the benefits that were anticipated? PWA would assume that the Project Officer (Nature Conservation) would be a significant participant in any assessment of this kind, and would welcome an assurance from the Council that this will be the case.</p>	<p>The policy wording and order has been significantly altered since the 2013 version of the policies were consulted on. The policy guidance on nature conservation and open space in the 2015 version of the document is consistent with the heirarchy of open space and the National Planning Poilcy Framework, however additional comment on the current wording is welcomed through future consultation exercises.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 22	<p>PWA notes the policy’s emphasis on trees. However, it notes that, in the past, young trees planted with the best of intentions, either by the Council or developers, have simply not survived. This was notable in the children’s play area in Albert Road Recreation a few years ago. For tree planting to have long term value for residents, there must be some assurance that young trees will be maintained whilst they establish themselves. PWA therefore suggests that, if a tree planted as part of mitigation does not survive two years after planting, the Council reserve the power to oblige the developer to replace it. (This proposal follows naturally from the comments about ‘successful implementation’ above.) Consideration should be given to creating a standard condition on replacement trees to the effect that “any replacement tree that does not survive in a healthy condition for two years must be replaced within one planting season of its demise”.</p>	<p>The borough appropriately recognises the importance on trees and seeks to ensure that replacement trees are of adequate quality and have sufficient chances of making it through the first few seasons of transplanting. The detail proposed in this particular comment would be difficult to enforce. However, additional policies, and policy guidance on landscaping is now contained within the design policies.</p>
PWA	DMP 7	<p>DMP 7 – Good Design and Quality of Life PWA supports the general policy, but considers that:</p> <ul style="list-style-type: none"> • while the demands for sympathetic housing development are paramount, the Council should make it plain that the title of this policy extends to all forms of development 	<p>The design policies in the 2015 document are clearly specific to the forms of development to which they relate.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 7	<ul style="list-style-type: none"> • more emphasis should be placed on access to open space. While DMP21 deals specifically with open space, an overall policy on Quality of Life should inform residents and developers alike of the raft of studies showing how general well-being is enhanced by proximity to quality open space. 	<p>The Open Space and Biodiversity Study has informed more comprehensive approach to open space for the 2015 version of the DM DPD. This includes an approach to improve access to open space where there is deficiency and where that need cannot be reduced by provision of new open space. The design policies and reasoned justification also give evidence for the importance of design, including open space, as a factor of health.</p>
PWA	DMP 7	<ul style="list-style-type: none"> • As an example of this, in April 2013 the University of Exeter published the results of a survey which followed the well-being of several thousand people over a period of 18 years, during which time they might have moved from a very urban into a greener environment or vice versa. Dr Mathew White of the University of Exeter, who conducted the survey, said: "...green space both reduces mental distress and increases wellbeing through different mechanisms." http://www.scienceomega.com/article/1044/greener-cities-improve-residents-wellbeing In a separate survey in Philadelphia, USA, it was found that the presence in urban surroundings of well-maintained areas of trees and shrubs seemed to reduce certain categories of crime, such as robbery and assault. Professor Jeremy Mennis said: "Wild vegetation in a vacant lot suggests there is very little social control over an area, and that may encourage criminal activity. It is suggestive of a place where people aren't paying attention; where neighbours are not coming together or looking out for their environment or each other. The direct opposite is conveyed when there is a very well-maintained vegetated landscape."(PWA 	<p>Noted, the Open Space and Biodiversity Study has informed more comprehensive approach to open space for the 2015 version of the DM DPD. This includes an approach to improve access to open space where there is deficiency and where that need cannot be reduced by provision of new open space. The design policies and reasoned justification also give evidence for the importance of design, including open space, as a factor of health.</p>

Consultee	Policy	Summary	Council Response
		<p>underlining) http://www.scienceomega.com/article/991/combating-crime-with-urban-greenery#ixzz2SmGsPDc3</p>	
PWA	DMP 7	<ul style="list-style-type: none"> • the Council needs to include more explicit wording on the need for quality hard and soft landscaping schemes to be prepared for major developments, and is referred to the two surveys mentioned above. 	<p>The design policies have specific landscaping policies which will ensure, for major developments, appropriate quality landscaping will be delivered on site.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 7	<p>Protection of Views: As regards the protection of views, PWA suggests that the view from the Friern Bridge Retail Park over the Pinkham Way site up towards Alexandra Palace is a welcome relief from the harsh urban impact of the A406, as well as being an intrinsically fine view, and should be protected. Two photographs are sent as attachments.</p>	<p>The locally important views and vista are protected by the proposed policy in DM6, and the schedule of views is contained in Appendix A. The views and vista proposed in the DM DPD go well beyond the requirement for view protection as required by the London Plan. It is unclear how the borough could protect the view suggested in this comment, because the viewing place or assessment point is outside the borough, therefore development is outside the control of LB Haringey, any future development on this site would not be required to heed the view protection corridor.</p>
PWA	DMP 8	<p>DMP 8 – Sustainable Development and Climate Change PWA supports the approach but will need to see the final wording before making specific comments. It refers the Council to the remarks about sustainability on page 1 of this submission and suggests that, if the Council agrees that a form of words should be drafted, it should be included in this policy.</p>	<p>Noted. The 2015 version of the DM DPD contains a much more updated and well drafted policies on sustainable development and climate change. Additional comments on this policy will be invited in the next regulation 18 consultation.</p>

Consultee	Policy	Summary	Council Response
PWA	DMP 9	<p>While PWA is aware that the final paragraph of DMP9 deals with the new NLWP and allocation of waste sites in general, it feels that this policy should show much stronger emphasis on the Council's own criteria. Thus it should extend the specific principle of the above statement to the allocation of any site in the borough for waste. The final paragraph on p 30 mentions a number of environmental impacts that should be assessed in judging a site's suitability for waste. For PWA, it is essential that the Council is explicit that these impacts, including odour, will be assessed individually, as PPS10 states plainly that they should be.</p>	<p>The DM11 policy deals with new waste facilities, however the appropriate place for this criteria is the North London Waste Plan which will ensure a consistent approach to waste management, and the assessment of planning applications for waste facilities, is adhered to by all North London Boroughs.</p>
PWA	DMP 9-11	<p>DMP 9-11 PWA supports the general approach but will need to see the final wording before making specific comments.</p>	<p>Noted.</p>
PWA	General	<p>PWA feels that there is insufficient detail, either in the document or on the Council's Planning website, about the next steps in the document's progress. It would welcome clarification on the following points:</p> <ul style="list-style-type: none"> • It feels strongly, and proposes, that there should be a further opportunity to comment on the submission document which will be presented for independent examination in public, and • Would welcome an indication of when such an opportunity will be offered, and the likely date of the document's submission to the Planning Inspectorate. • In the event of there not being a second consultation, PWA would welcome opportunities for continuing discussion with the Council about policy development. 	<p>The significant changes to the document which have come about since the 2013 version have meant that another round of regulation 18 consultation is appropriate, and PWA will be invited to make comment on the document through this process.</p>

Consultee	Policy	Summary	Council Response
PWA	Glossary	<p>Glossary - Brownfield land - PWA considers that the definition given in the London Plan 2011 should be substituted for the current partial definition given here. The full London Plan definition is as follows:</p> <p>“Brownfield land - Both land and premises are included in this term, which refers to a site that has previously been used or developed and is not currently fully in use, although it may be partially occupied or utilised. It may also be vacant, derelict or contaminated. This excludes open spaces and land where the remains of previous use have blended into the landscape, or have been overtaken by nature conservation value or amenity use and cannot be regarded as requiring development.“</p>	<p>The definition for brownfield land is included in the glossary of the 2015 version of the document. For the purposes of consistency, this is identical to the version included in the Strategic Policies Local Plan for the borough.</p>
PWA	Glossary	<p>We also suggest that for completeness there should be a definition of previously developed land included in the Glossary since it is used in the NPPF and the London Plan. The London Plan definition is as follows:</p> <p>“Previously developed land - is that which is or was occupied by a permanent structure, including the curtilage of the developed land and any associated fixed surface infrastructure. The definition includes defence buildings, but excludes: Land that is or has been occupied by agricultural or forestry buildings. Land that has been developed for minerals extraction or waste disposal by landfill purposes where provision for restoration has been made through development control procedures. Land in built-up areas such as private residential gardens, parks, recreation grounds and allotments, which, although it may feature paths, pavilions and other buildings, has not been previously developed. Land that was previously-developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape in the process of time (to the extent that it can reasonably be considered as part of the natural surroundings). There is no presumption that land that is previously-developed is necessarily suitable for housing development nor that the whole of the curtilage should be developed”.</p>	<p>The borough's policies must be consistent with the London Plan and the NPPF and there is no need for repetition of policy in the Local Plan.</p>

Consultee	Policy	Summary	Council Response
PWA	Glossary	<p>The words 'sustainable' and 'sustainability' are used constantly in describing developments or policies. PWA feels that it would help public understanding of this aspect of planning, and enhance this document's accessibility, if the Council could include their own working definition of these terms, which in PWA's experience, can be used cheaply and inappropriately by developers and politicians, simply because 'sustainability' is now a central thread of planning policy. The public can actually be left confused.</p> <p>PWA suggests that a form of words, perhaps based on the Foreword to the NPPF, and/ or the website https://www.gov.uk/sustainable-development-impact-test, might be appropriate. It could be quoted in the preamble to this document and repeated in DMP 8.</p>	<p>The NPPF contains adequate reference to the word "sustainable" and there is no need to repeat National Policy Guidance in the borough's Local Plan.</p>
RPS for Costco	DMP 1	<p>Costco requests the following amendment to the definition of Locally Significant Industrial Sites (LSIS) on page 8 of the Development Management Policies DPD. This amendment will ensure that the definition in the emerging DPD reflects the description of uses recognised as suitable for LSIS within the adopted Haringey's Local Plan: Strategic Policies.</p> <p>Locally Significant Industrial Sites (LSIS) are a local Haringey designation. These are well established industrial areas and the Council's aim is to retain these areas solely for uses that fall within the B uses classes e.g. warehousing, offices and logistics or uses that share strong similarities to this use class, for example, policing and other community safety infrastructure or closely related uses not falling within a use class, sui generis uses (such as cash and carry businesses and builders merchants) but which are commonly found in industrial estates.</p>	<p>The policy wording has been significantly altered since the 2013 version of the policies were consulted on, so it is not possible to include this suggested change verbatim. This hierarchy is a summary reflecting the Strategic Policy document.</p>

Consultee	Policy	Summary	Council Response
Savills for Thames Water	DMP 14	<p>DMP14 Basements – All basement developments should be required to install protection against the risk of surcharge flooding from the sewers as recommended in part H of the building regulations.</p> <p>Basement development in areas at risk of surface water flooding should be required to investigate appropriate mitigation to reduce the risk of overland surface water flooding.</p>	<p>Policy DM 24 (Residential Basement Development and Light Wells) seeks to ensure that proposals for basement development do not increase flood risk. In addition, Policy DM 35 (Managing and Reducing Flood Risk), DM 37 (Sustainable Drainage Systems), DM38 (Critical Drainage Areas) and DM41 (Managing Drainage Connections and Wastewater) are considered to appropriately address the matter raised. The Council will ensure that all development meets the standard required in relevant Building Regulations.</p>
Savills for Thames Water	DMP 23	<p>It is therefore important that Policy DMP23 is amended to specifically refer to water and wastewater/sewerage infrastructure or there should be a new Policy along the lines of:</p> <p>Proposed Addition to Infrastructure Policy DMP23 or Text for new Water/Wastewater Infrastructure Policy</p> <p>The Council will take account of the capacity of existing off site water supply and wastewater/sewerage infrastructure and the impact of development proposals on them. Where necessary the Council will seek improvements to water supply and/or wastewater/sewerage infrastructure related and appropriate to the development so that the improvements are completed prior to occupation of the development.</p> <p>Planning permission will be granted for new water supply and wastewater/sewerage infrastructure improvements necessary to meet existing or</p>	<p>These matters have been addressed by Policy DM35 (Managing and Reducing Flood Risk) and in particular DM41 (Managing Drainage Connections and Wastewater).</p>

Consultee	Policy	Summary	Council Response
		<p>future demand, or in the interests of long term water supply or waste water management, where the proposals are consistent with, or do not materially conflict with, other development plan policies”.</p>	

Consultee	Policy	Summary	Council Response
Savills for Thames Water	DMP 23	<p>Text along the following lines should be added to the DPD to support the above proposed Policy:</p> <p>“The Council will seek to ensure that there is adequate water and sewerage capacity to serve all new developments. The developer will be required to demonstrate that there is adequate infrastructure both on and off the site to serve the development and that it would not lead to problems for existing users or future occupiers.</p> <p>In some circumstances a water supply and / or drainage strategy will need to be produced by the developer in liaison with water and/or sewerage undertaker to ensure the appropriate upgrades are in place ahead of occupation of the development.</p> <p>Where there is a capacity problem and no improvements are programmed by the water and/or sewerage undertaker, then the developer needs to contact the water company to agree what improvements are required and how they will be funded prior to any occupation of the development.</p> <p>Further information for Developers on water/sewerage infrastructure can be found on Thames Water’s website at: http://www.thameswater.co.uk/cps/rde/xchg/corp/hs.xsl/558.htm Or contact can be made with Thames Water Developer Services By post at: Thames Water Developer Services, Reading Mailroom, Rose Kiln Court, Rose Kiln Lane, Reading RG2 0BY; By telephone on: 0845 850 2777; Or by email: developer.services@thameswater.co.uk</p> <p>A major upgrade is being planned by Thames Water for the Deephams Sewage Works during the plan period, to meet new environmental standards and to accommodate growth within the catchment (including Haringey). The principal of the upgrade is supported as being necessary to deliver infrastructure to meet existing and future wastewater demands.”</p> <p>Such a policy and supporting text is important as water and sewerage undertakers have limited powers under the water industry act to prevent connection ahead of infrastructure upgrades and therefore rely heavily on the</p>	<p>These comments have been taken into account in preparation of Policy DM41 (Managing Drainage Connections and Wastewater), which addresses the matters raised. Further, some of the suggested text has been included in the policy reasoned justification. The supporting text also signposts the importance of liaising with Thames Water, as appropriate.</p>

Consultee	Policy	Summary	Council Response
		planning system to ensure infrastructure is provided ahead of development either through phasing or the use of Grampian style conditions.	

Consultee	Policy	Summary	Council Response
Savills for Thames Water	DMP 8	<p>Water conservation and climate change is a vitally important issue for the water industry. Not only is it expected to have an impact on the availability of raw water for treatment but also the demand from customers for potable (drinking) water. Therefore, Thames Water support water conservation and the efficient use of water and this should be covered in Policy DMP8 in line with Policy 5.15 of the London Plan.</p>	<p>The Council recognises the need to take account of climate change adaptation and mitigation measures, including in respect of water conservation. The Strategic Policies Local Plan SP5 sets out the Council's policy approach and requirements on minimising water use and promoting water efficiency, including paragraph 4.2.3 on 'Water Demand', which includes a reference to the London Plan water consumption target.</p>
Savills for THFC	DMP 1	<p>The Council had sought to re-allocate some of the DEAs, however, the inspector considered that this has not been properly justified with a robust evidence base. As such, it is particularly important that the Development Management Policies document takes this into account as there are clear aspirations from the Council to release some of the employment land for alternative uses. Accordingly, more flexibility should be built into this policy and its supporting text. This would ensure consistency with the NPPF.</p>	<p>The Council has commissioned an employment land review which looks specifically at the points raised. The re-allocation of the relevant DEAs is set out in the current draft Tottenham AAP and the Site Allocations DPD. The alterations to the Strategic Policies Local Plan has also taken account of these changes. Please see these documents</p>

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 1	<p>In order to maintain sufficient flexibility for changes in circumstances applicants should be required to meet at least one of the criteria and not all of them, i.e. the word '<u>or</u>' should be added after each criterion.</p> <p>Furthermore, in order to ensure consistency with the NPPF, we suggest that the council add or amalgamate the following criteria.</p> <p>1. it can be demonstrated through the submission of a Viability Assessment that it is no longer financially viable to maintain an employment use on the site; <u>Or</u></p> <p>2. it can be demonstrated through a Market Report that has been prepared by a suitably qualified person that there is no demand for the continued use of the site for B use classes.</p>	Please see policy DM52 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 1	<p>Where a potential change of use is to occur within a Locally Significant Industrial Site (LSIS) or Local Employment Area (LEA), the council states that it would require the following: (see hard copy rep).</p> <p>Accordingly, we believe that this part of the Development Management Policies Document would not be 'effective'. As such, it should be deleted and no such requirements should be imposed on proposed development.</p>	This point is covered by SP9 of the Strategic Policies Local Plan document. Please refer to that policy.
Savills for THFC	DMP 1	<p>The council states that it could also request that all developments explore the provision and/or integration of alternative employment uses, such as creative and cultural business, or providing a space for small, medium or micro business. It is important that their provision should be subject to considerations of need and viability, for example, the locality may not be suitable for such uses or there may already be an oversupply of these types of uses in the locality or their provision may not impact on the overall viability of the development.</p>	Please see policy DM52 of the current draft Development Management Policies DPD.

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 1	We also wish to make the following representations on the supporting text following the policy: Generally, the policy and supporting text make inconsistent references to both 'employment land' and 'employment generating' uses. However, the latter is correctly defined as referring to all non-residential uses that generate employment. the council should consistently adopt the term 'employment generating uses' and apply its tests accordingly....such an approach would better enable the council to capture job creation in whatever industries may emerge in response to regeneration efforts.	This text and policy have been replaced by policy DM52 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 1	Fourth paragraph: In order to ensure that the policies can rapidly adjust to changes in circumstances, it is important that the council does not apply a strict 18 month marketing period rigidly. Instead, if the applicant seeks to reply upon this criterion and can demonstrate an intense marketing campaign over a shorter timescale, this should be disregarded. clarification on this point should be included within the supporting text of the policy.	This text and policy have been replaced by policy DM52 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 1	Have we identified all the issues in relation to Employment and Business uses? NO. The draft policy, as it stands, is not justified or effective. It is also inconsistent with the NPPF.	This text and policy have been replaced by policy DM52 of the current draft Development Management Policies DPD, the Tottenham AAP and the Site Allocations DPD.
Savills for THFC	DMP 1	Do you agree with linking new employment opportunities with local job creation? No. For the reasons explained above, requiring all developments where there is a loss of employment uses to provide alternative employment uses would not be effective, particularly where sites have been demonstrated to be surplus to requirements.	This text and policy have been replaced by policy DM52 of the current draft Development Management Policies DPD, the Tottenham AAP and the Site Allocations DPD.

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 1	<p>What do you think are the likely outcomes of the Government's proposals to allow a change of use from offices to housing without planning permission and what does it mean for the future of our employment areas?</p> <p>We support the government's efforts to deliver more housing. We do not think it will impact on the future of employment areas as exemptions will be granted where there would be a loss of nationally significant areas of economic activity or substantial adverse economic consequences at the local authority level.</p>	Noted.
Savills for THFC	DMP 10	<p>It is important that feasibility and viability are key consideration when assessing the ability of schemes to comply with sustainability, energy and carbon reduction standards. There may also be other site specific circumstances which mean that the standards set by the London Plan and Local Plan cannot be adhered to...The policy should therefore be drafted to take account of site specific circumstances, viability and feasibility.</p>	Agreed. Please see policy DM28 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 10	<p>Any proposal to include a carbon offset fund should also be subject to viability testing. If it can be demonstrated that a contribution towards this fund to render a scheme unviable or if it would affect the ability of a scheme to deliver affordable housing, the developer should not be required to agree to such a contribution. The impact of Community Infrastructure Levy (CIL) should also be factored into these considerations.</p>	Noted.
Savills for THFC	DMP 10	<p>With regard to the option to request energy assessments for residential building where an extension is proposed to see if low cost energy efficient improvements can be made to the existing property, this would be contrary to the NPPF which states at paragraph 193 that the requirements for applications 'should be proportionate to the nature and scale of development proposals...local planning authorities should only request supporting information that is relevant, necessary and material to the application in question'.</p>	Please see policy DM28 of the current draft Development Management Policies DPD

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 10	Do you agree that a policy should require a minimum of BREEAM 'Excellent' for major domestic refurbishment projects? No. Site specific circumstances, feasibility and viability should be taken into account when assessing schemes against standards set by the council	Please see policy DM28 of the current draft Development Management Policies DPD
Savills for THFC	DMP 10	Do you agree that off site provision of renewable energy or an off set payment (should a carbon offset fund be a viable option) be used where on-site provision is not feasible? No. This should be subject to further viability testing, taking account of other policy requirements in relation to affordable housing and also the impact of the community infrastructure Levy. The NPPF requires that careful attention is given to viability (para 173).	Please see policy DM28 of the current draft Development Management Policies DPD
Savills for THFC	DMP 10	Do you agree that retrofitting of solid wall insulation should be considered? No comment, although the council should not impose specific standards when there may be other innovative solutions that could be used to achieve the same objectives	Please see policy DM28 of the current draft Development Management Policies DPD
Savills for THFC	DMP 11	We request that the first statement is amended as follows: Development that harms the heritage of the borough will not <u>NORMALLY</u> be permitted	Please see policy DM12 and policy DM13 of the current draft Development Management Policies DPD
Savills for THFC	DMP 13	We believe the council should acknowledge that there may be sites where tall buildings would be appropriate, and that individual applications should be considered against the criteria set out in the London plan.	Please see both the current draft Tottenham AAP and the Site Allocation DPD
Savills for THFC	DMP 13	The council only identifies Haringey Hartlands and Tottenham Hale as being potentially suitable locations for tall buildings. The council should add Northumberland Park Area of change as a location that is potentially suitable for tall buildings.	Please see the current draft Tottenham AAP

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 18	The council states that it will aim to ensure that new facilities deliver infrastructure to meet the needs of population using the CIL and through section 106 agreements. This would appear to conflict with regulations 122 and 123 of the Community infrastructure levy regulations 2010, which constrain the use of S106 planning obligations.	please see the Council's adopted Planning Obligations SPD which sets out the relationship between CIL and S106 in Haringey.
Savills for THFC	DMP 2	In order to ensure that development is consistent with NPPF, it is important that the policy for retail uses and town centres is flexible so that it can respond to rapid changes in circumstances.	Please see policy DM53 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 2	Furthermore the policy should be made consistent with Local Plan policy SP10 which states that 'It is possible to identify future changes to the borough's town centres over the life of the local plan, including potential new centres'.policy DMP 2 therefore needs to reflect this potential change more explicitly and set out the criteria for the designation of new town centres (such as the one centred on NDP in north Tottenham) to give effect to local plan policy SP10.	Please see policy DM53 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 2	The policy should not completely preclude the loss of retail uses from Town centres. The provision of retail uses outside of existing town centres should be more appropriately justified through retail impact assessment (and sequential assessment, if required). The policy should also outline the threshold at which impact and sequential assessments would be required, as it would not be reasonable to expect these to be submitted for smaller retail developments that form part of larger mixed use regeneration proposals.	Please see policy DM53 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 2	Have we identified all the issues in relation to Retail and town centres? NO. Please see comments above. Particularly in relation to Local Plan Policy SP10.	Please see policy DM53 of the current draft Development Management Policies DPD.
Savills for THFC	DMP 2	Do you agree on how we are going to address issues in relation to retail and town centres?	Please see policy DM53 of the current draft Development

Consultee	Policy	Summary	Council Response
		No. Please see comments above.	Management Policies DPD.
Savills for THFC	DMP 2	What other uses should we encourage in our Metropolitan and District Centres? Residential uses as part of mixed use redevelopment proposals should be encouraged, as these centres comprise sustainable locations where higher density development would normally be acceptable.	Please see policy DM53 of the current draft Development Management Policies DPD and Policy AAP3 of the Tottenham AAP
Savills for THFC	DMP 2	How should we encourage a variety of uses in centres so that there is activity out of normal working hours? A variety of uses should be encouraged as centres provide a sustainable location for development. Uses should not be discouraged unless overconcentration would result in harmful impact.	Please see policy DM53 of the current draft Development Management Policies DPD and Policy AAP3 of the Tottenham AAP and the individual site allocations
Savills for THFC	DMP 20	No comments but note that it overlaps significantly with policy/chapter DMP1 and appears duplicative. We suggest the two are amalgamated or consolidated.	noted
Savills for THFC	DMP 3	This document (Housing SPD 2008) was adopted nearly 5 years ago, and given the local plan period until 2026, it is now relatively dated and will only become more obsolete. It is therefore increasingly important that account is taken of site specific circumstances when assessing whether the dwelling types and sizes are appropriate. Consideration should be given to local housing types and sizes; identified needs, site constraints; and also to viability issues. These factors should be noted as being material considerations in the policy or within its supporting text.	Please see policies DM16-19 of the current draft Development Management DPD

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 3	Have we identified all the issues in relation to meeting future housing need? No. As noted above, in focussing development in growth areas, it should be recognised that there will be other sites which are also suitable for housing development and that these sites would help to meet and exceed the housing targets in accordance with strategic policy requirements. In addition, requirements on housing mix should take account of the specific circumstances of the site.	Please see policies DM16-19 of the current draft Development Management DPD
Savills for THFC	DMP 3	Are there any areas where it would be appropriate to promote additional housing in response to new regeneration challenges? Yes, north Tottenham and in particular, the Northumberland Park Area of Change should be more explicitly identified in line with local planning policy SP1(managing growth), the various NDP permissions and non-statutory documents such as A Plan for Tottenham and It Took Another Riot.	Please see policies DM16-19 of the current draft Development Management DPD and Policy AAP 1 of the Tottenham Area Action Plan.
Savills for THFC	DMP 3	Do you agree on how we are going to address issues in relation to meeting future housing needs? Yes, but as noted above, in focussing development in growth areas, it should be recognised that there will be other sites which are also suitable for housing development and that these would help to meet and exceed the housing targets, which is encouraged by the Local Plan and the London Plan.	Please see policies DM16-19 of the current draft Development Management DPD
Savills for THFC	DMP 4	It is important that each proposal is considered on its own merits taking account of site specific circumstances and the policy should be drafted to take this into account. The NPPF requires that careful attention is given to viability (para 173) and this would be an important consideration when negotiating the tenure mix on individual sites.	Agree
Savills for THFC	DMP 8	We have no specific representations at this stage on the content of DMP 8, but note that it overlaps significantly with policy/chapter DMP10 and appears duplicative. We suggest that the two are amalgamated or consolidated.	Noted

Consultee	Policy	Summary	Council Response
Savills for THFC	DMP 9	Although developers would normally seek to retain and reuse existing buildings where possible, there is no statutory or policy basis for enshrining the need to justify the demolition of a building that is not a heritage asset. The requirement should be removed.	Please see chapter 2 of the current draft Development Management DPD
Sport England	DMP 18	The Sports Facility Calculator can be viewed on this link: http://www.sportengland.org/facilities__planning/planning_tools_and_guidance/sports_facility_calculator.aspx Sport England would suggest that the policy makes reference to the Calculator so that it can assist in providing an evidence base for contributions to sport from developments.	Noted.
Sport England	DMP 19	Sport England has a range of design guidance covering issues such as developing new playing field to the design of sports halls and playing field pavilions. These design guidance notes have been developed in consultation with National Governing Bodies for Sport in order to ensure that they are fit for purpose. Sport England would suggest that the policy makes reference to the design guidance available on the Sport England website, which can be viewed on this link: http://www.sportengland.org/facilities__planning/design_and_cost_guidance.aspx	Noted.
Sport England	DMP 21	Sport England's Playing Fields Policy can be viewed in more detail on this link: http://www.sportengland.org/facilities__planning/planning_applications/playing_field_land.aspx We would suggest that the policy reflects the exceptions in Sport England's Playing Fields Policy as this does allow developments that will support open space, such as changing rooms, club houses etc.	Noted.

Consultee	Policy	Summary	Council Response
Stroud Green CAAC	DMP 11	<p>Conservation Areas are only briefly referred to in the DMP (DMP11 - page 34). There is no adequate analysis of why an area should be designated as a Conservation Area (CA) and what special characteristics in the area need to be conserved. DMP11 states (para 3) that SP12 'identifies the borough's 29 Conservation Areas' but this does not in fact appear to be the case.</p>	<p>The 2013 version of the document, was, as mentioned in the accompanying cabinet report, was a direction of travel document. This 2015 version, includes additional clarity and content, and contains specific policies including DM12, DM13, DM14 and DM15 which are about managing development in the historic environment.</p>
Stroud Green CAAC	DMP 11	<p>DMP11 refers to Local Plan policy SP12 'Conservation' which is a historical overview of the whole of the borough of Haringey, with several detailed paragraphs on Highgate and Tottenham and views from Alexandra Palace. There is no specific reference to any of the other CAs in Haringey. We believe that there should be an analysis, even if only briefly, of every CA in Haringey.</p>	<p>The 2013 version of the document, was, as mentioned in the accompanying cabinet report, was a direction of travel document. This 2015 version, includes additional clarity and content, and contains specific policies including DM12, DM13, DM14 and DM15 whi</p>
Stroud Green CAAC	DMP 11	<p>DMP11 (Heritage & Conservation): there is no reference to soft landscaping or external areas, and we would like to see clearer policy on this, particularly relating to front gardens and hard-standings, and the continuing problem of unsightly refuse bins</p>	<p>The 2013 version of the document, was, as mentioned in the accompanying cabinet report, was a direction of travel document. This 2015 version, includes additional clarity and content, and contains specific policies including DM12, DM13, DM14 and DM15 whi</p>

Consultee	Policy	Summary	Council Response
Stroud Green CAAC	DMP 11	The red box 'what is the aim...' states that the policy will ensure that any new proposals...do not have a negative impact...'. We would prefer a change of emphasis to require the developer to state how a development will have a positive impact (the NPPF stresses that a development should not cause harm to heritage assets – which includes CAs)	The design policies, and design charter as proposed in the 2015 version of the document, do take this more positive approach to justifying planning applications.
Stroud Green CAAC	DMP 11	The purple box 'How can this policy...' mentions the borough's heritage assets, but these all need to be suitably listed, described and protected.	Noted.
Stroud Green CAAC	DMP 11	The 'Fact Box' needs to include a note about conservation areas, in addition to comments about listed buildings and local views.	Noted, fact boxes have been withdrawn from the 2015 version of the document.
Stroud Green CAAC	DMP 11	There is no reference in the DMP to Conservation Area Advisory Committees, which can play such a valuable part in commenting on planning applications, and whose members often put in considerable commitment.	The commitment and value of CAACs is well known and recognition has been given to this in the reasoned justification in DM12.
Stroud Green CAAC	DMP 11	SP12 para 6.2.21 refers to regular monitoring in appendix 3, but this is not mentioned in DMP11. Appendix 3 is very imprecise and needs more detail. For instance, the statement that 'The Council will protect and enhance buildings and areas of historical interest and importance and their settings' must be backed-up with a suitable enforcement policy.	The 2013 version of the document, was, as mentioned in the accompanying cabinet report, was a direction of travel document. This 2015 version, includes additional clarity and content, and contains specific policies including DM12, DM13, DM14 and DM15 whi

Consultee	Policy	Summary	Council Response
Stroud Green CAAC	DMP 5	DMP5 (HMOs): we believe that the proposed Article 4 Direction should cover the whole of the borough (not just the eastern wards, as currently proposed).	The approach to controlling HMO's has changed focus slightly and the current approach is consistent with the evidence.
Stroud Green CAAC	DMP 7	DMP7 (page 24) refers to Local Plan policy SP11 'Design' and the need for high quality design in new development. There does not appear to be any attempt to clarify what is meant by 'good design' which can be particularly contentious in CAs, where the existing character, rhythm and materials need to be enhanced.	Design is a notoriously contentious issue however the Council has attempted to clarify what is required in design terms in the numerous design policies.
Theatres Trust	DMP 17	DMP17 Parking and Transport Impacts Theatres and evening entertainment arts venues are unlike other forms of the night time economy – they attract families, young people, disabled patrons, and older people who can be discouraged to attend a performance if the costs of travelling and parking at the theatre make the price tag of the evening out too high. Where restrictive regimes do occur we would urge the planning authority to allow for special conditions that can provide free parking to theatre patrons. For car parking standards we recommend the following for theatres (sui generis not D2): 1 cycle stand per 20 seats – 1 parking space per 5 fixed seats – 3 disabled bays or 6% of total capacity - adequate turning and loading facilities inc. space for one coach or 16.5 m lorry.	Adequate parking facilities for theatres, as a sui generis use, would be determined in detail, if necessary, through planning application and proper transport assessment.

Consultee	Policy	Summary	Council Response
Theatres Trust	DMP 18	<p>However your list of infrastructure on page 52 does not include the work 'cultural'. We suggest the fourth bullet point is amended to read Leisure and cultural facilities.</p> <p>There is a duplication in the Glossary regarding the descriptions for Community Facilities and Social Infrastructure. We suggest that as these descriptions refer to Policy DM18 that one is deleted and the other made more clear. Policy DM18 refers to community facilities and the term 'social infrastructure' is not used anywhere in the document and therefore requires no explanation and should be deleted.</p>	<p>Theatres are considered as a suitable use for town centres. Policies DM58 and DM59 deal with the provision of community infrastructure, these have been clarified and enhanced since the 2013 version of the document.</p>
Theatres Trust	DMP 18	<p>A succinct description for the term 'community facilities' that includes all types of infrastructure could be - The function of community facilities is to provide services and access to venues for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community.</p>	<p>The term for community facilities is similar to the definition used in the National Planning Policy Framework.</p>

Consultee	Policy	Summary	Council Response
Tottenham Civic Society	DMP 11	<p>We do not have any particularly strong views on the policies outlined in the document (which is clearly more a set of general policy statements than detailed guidance, setting down the broad outlines of what the council expects to see and/or promote beneath each of the broad general headings into which the policies are sub-divided.) We instead consider that the real issue is not what development management policies the council adopts but their actual enforcement, day-to-day and on the ground -- the very area in which, in the past, the council has repeatedly failed to follow through. It is all very well to say in (for instance) DMP 11, Heritage and Conservation, that "We want to ensure that in determining planning applications the significance of the Conservation Area, historic buildings and setting are fully considered" -- but what is to be made of this statement when set against the recent acceptance of a proposal for a giant garish fascia advertisement for a betting shop in Bruce Grove, nodded through by a planning officer apparently unaware that Bruce Grove is a conservation area? Or (for another example) there is the statement in DMP 7, Good Design and Quality of Life, which avers that "Thoughtful design is particular (sic) key in sensitive areas such as where there is an impact on heritage assets such as Conservation Areas and adjacent to Metropolitan Open Land" -- but against this there is a current proposal for market stalls to re-colonise the Bruce Grove station forecourt, in which the Tottenham regeneration team is named in support: if this is so, one can only suppose that the team is unaware of the eviction of the stalls from the forecourt by planning enforcement officers a mere three months ago. And so on, and so on -- examples could be multiplied ad infinitum. It seems to us, therefore, that the best response to the consultation is not to comment directly on the content of the document but to ask the council to spell out what steps it will take to ensure that these development management policies are embedded in its planning and enforcement processes -- how it will bring the policies to the attention of all relevant staff (planning, enforcement, environmental health, regeneration teams, et al); what workshops or other training sessions it will organise to ensure that all relevant staff internalise the scope, nature and intended outcomes of these policies; how the adherence of all relevant staff to</p>	<p>Noted, the 2013 version of the document, as outlined in the accompanying cabinet report, is a "direction of travel" document and as such the policies outlined were not as detailed as what would be expected for the purposes of development management. Enforcement matters are an important part of the Council's activities.</p>

Consultee	Policy	Summary	Council Response
		<p>these policies will be monitored; and how often that adherence will be reviewed. We would also like to ask the council what action it will take to ensure these development management policies are brought to the attention of prospective applicants and their agents -- not just whether the eventually adopted policies will be published on the council's website, but whether reference to the policies will be included in an information pack to be sent to all applicants; whether applicants will be provided with bespoke advice to help them align their applications with the policies; and whether applications which are not so aligned will be rejected at an early stage, thus saving the time and energy of not just all relevant council staff but also the planning committee, councillors and of course members of the public who have an interest in such matters.</p> <p>Without this, it seems to us, there is a strong risk that the borough could end up with a set of fine-sounding development management policies which in practice are ignored or overlooked more often than not.</p>	

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	General	The document there is a lack of urban design policy, particularly in the area of the public realm. The NPPF enshrines good design as a core principle, but there is inadequate support for this in the document.	The revised version of the document contains more detailed policies on design and town centres to address this.
Highgate Society/Highgate Neighbourhood Forum	General	In specific terms, we would like to see the revision and adoption/re-adoption of the following SPG's: - SPG.4.1 (Archway Road Neighbourhood Plan, 1995) and the two versions of the Archway Road Regeneration Plan subsequently produced by Haringey in 2000 and 2006, none of which appear to have been observed or implemented. - SPG 3.5 (1999) The Highgate Bowl, dropped from the subsequent UDP because it was asserted that other existing policies in the UDP provided adequate protection, as assertion which subsequently proved flawed.	The Site Allocations DPD, has a site allocation for most of these sites and provides greater planning weight for
Highgate Society/Highgate Neighbourhood Forum	DMP 1	Ensure any development involving existing employment use, particularly those operating from existing small scale and low rent premises, retains these, possibly with small, low cost "incubator units"	The 2015 version of the DM policies provides greater clarity and detail on employment, and has been informed by a recently created Employment Land Review. Details on incubator units, or affordable work spaces are contained within the Employment policies in chapter 7.
Highgate Society/Highgate Neighbourhood Forum	DMP 1	Examine borough procurement policies to investigate whether local businesses can be appointed to contracts. Current public sector procurement practices favour the large supplier with the result that small local providers are excluded	Noted, however borough procurement policies are not the subject of the DM DPD consultation.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 1	The requirement to create extra employment floor space is welcomed but it is unclear how and where this will be provided	The 2015 version of the DM policies provides greater clarity and detail on employment, and has been informed by a recently created Employment Land Review.
Highgate Society/Highgate Neighbourhood Forum	DMP 2	Concentrates on Town centres at expense of Local centres. These need to be included	The updated town centre policies relate to Local centres.
Highgate Society/Highgate Neighbourhood Forum	DMP 2	Concentrates on retail and does not acknowledge that there is likely to be a reduction in retail units through changing patterns of shopping such as the growth of internet shopping.	The growth of internet shopping is a significant factor in considering management of Town Centres. As part of the evidence base the Council commissioned a retail study which recognised the growing population which would require an increase in comparison and
Highgate Society/Highgate Neighbourhood Forum	DMP 2	Alternative uses should be recognised as providing employment and avoiding voids particularly in secondary parade.	The policies recognise the need to ensure vibrant centres and propose a sequential approach to alternative uses in centres.
Highgate Society/Highgate Neighbourhood Forum	DMP 2	Retention of essential produce shopping such as foodstuffs should be ensured	Policies for centres have a strong preference for retail, however there are no specific planning powers which can retain certain produce is

Consultee	Policy	Summary	Council Response
d Forum			sold.
Highgate Society/Highgate Neighbourhood Forum	DMP 3	Whilst the provision of social housing is to be welcomed, the council should be aware of possible unforeseen consequences in terms of development through the lowering of the threshold for social housing provision to 5 units. This is too small for RSL's to be able to manage and commuted sums on top of London Plan, CIL and increased standards could render small scale developments unviable	The matter of affordable housing has been considered at length and lowering the threshold is no longer considered to be a viable option for policy.
Highgate Society/Highgate Neighbourhood Forum	DMP 4	Special planning measures in the whole of the east of the borough are proposed because of poor educational attainment in local schools and other problems. The applications of these in only half of the borough will impact on the west of the borough and other local boroughs. The only thorough and equitable approach is to apply an A4D and CMA across the whole borough to avoid any poor standards of accommodation in the west of the borough. Rackmanism has been noted in the Archway Road so evidently special measures are required in the west of the borough as well.	There is an aspiration for the educational attainments of the entire borough and these are not limited to just the east or west.
Highgate Society/Highgate Neighbourhood Forum	DMP 5	There is inadequate protection for change of use from HMO's to self contained dwelling resulting in environmentally substandard and unsafe dwellings. Many of these are going through under Certificates of Lawfulness on the basis of Established Use. Any CoL for buildings of this type should be conditional on meeting standards on areas such as Mean of Escape, Daylighting, Ventilation etc.	Protection for change of use to HMOs has been enacted in the 2015 version of the document by introducing a "Family Housing Protection Zone".
Highgate Society/Highgate Neighbourhood Forum	DMP 5	Special protections are proposed for HMOs and conversions in only half of the borough with the likely impact those policies would have on the west of the borough and other local boroughs. The only thorough and equitable approach is to apply an A4D and CMA across the whole borough to avoid poor standards of accommodation in the west of the borough and social cohesion problems.	The "Family Housing Protection Zone" does not apply to the entire borough because the evidence base does not currently support setting the zone for the entire

Consultee	Policy	Summary	Council Response
			borough.
Highgate Society/Highgate Neighbourhood Forum	DMP 6	The Certificate of Lawfulness needs to be addressed (see also above) to prevent the provision of substandard dwellings.	The issuing of certificates of lawfulness is not an matter for consultation on the DM DPD.
Highgate Society/Highgate Neighbourhood Forum	DMP 6	HSG11 needs looking at to ensure it is not too rigidly applied	The housing policies have been updated, clarified and enhanced to ensure a balanced approach to delivering housing in the borough.
Highgate Society/Highgate Neighbourhood Forum	DMP 6	We consider all family accommodation should be provided with adequate amenity space rather than <i>"where appropriate"</i> .	The housing policies have been updated, clarified and enhanced to ensure a balanced approach to delivering housing in the borough.
Highgate Society/Highgate Neighbourhood Forum	DMP 6	The intent in the statement in DMP6 about a blanket ban on conversions is unclear and so would be unenforceable. It is therefore difficult to make a comment on this proposal.	Noted.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 7	This needs considerably strengthening to cover the overall street scene and the public realm through a stronger urban design policy. Possibly an Article 4 Directive would cover this.	Design Policies DM1, DM2, DM3, DM5 and DM6 set out policies on amenity through design. These are much more detailed than the policies contained in the 2013 version of the DM DPD and address the issues raised here.
Highgate Society/Highgate Neighbourhood Forum	DMP 7	Too many applications, such as those in the Bishop's area of Highgate and basement applications are judged on an individual basis without assessing the cumulative affect on the neighbourhood. The policy needs to address this by means of Conservation Area Appraisals and an Urban Design Policy	There is a new basement policy which has been updated in light of the previous consultations. In terms of the matters that can be controlled and are relevant for planning, these are reflected in policy DM24 Residential basement Development and light wells.
Highgate Society/Highgate Neighbourhood Forum	DMP 7	Currently the public realm is being degraded and this Policy does not cover this. The guardians of the public realm appear to be Highway's Department with support from the Refuse Department and little notice is taken of the quality of the environment created by their actions. This should be remedied.	Design Policies DM1, DM2, DM3, DM5 and DM6 set out policies on amenity through design. These are much more detailed than the policies contained in the 2013 version of the DM DPD and address the issues raised here.
Highgate Society/Highgate Neighbourhood Forum	DMP 7	No private refuse should be permitted to be stored on the public highway or pavement. This is a design and quality of life issue as well as public health and obstruction. Where there is not adequate off street accommodation within gardens or where the provision of bins adversely affects those occupying basement and ground floor flats (outlook onto bin storage) , Haringey should make provision for alternative arrangements for refuse collection.	New policies on the management of waste, including storage within new residential buildings, are contained in the 2015 version of the DM Document.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 7	Bins stores which were a planning requirement for conversions are now too small for the new bins. The new bins are considerably larger and two per household, regardless of size or number the households, are now required. We can see little or no mention of any requirement to provide bin storage. All applications should require a review of the adequacy of refuse storage and its impact on the street scene.	New policies on the management of waste, including storage within new residential buildings, are contained in the 2015 version of the DM Document.
Highgate Society/Highgate Neighbourhood Forum	DMP 7	A policy for the rationalisation and coordination of street furniture should be adopted	Design Policies DM1, DM2, DM3, DM5 and DM6 set out policies on amenity through design. These are much more detailed than the policies contained in the 2013 version of the DM DPD and address the issues raised here. Many of the work undertaken in highways are not subject to planning permission.
Highgate Society/Highgate Neighbourhood Forum	DMP 7	The Government has proposed a relaxation of the current planning regulations with regard to house extensions; however it is important that protection is still offered to residents' quality of life It will therefore be necessary to ensure that any potential loss of daylight and sunlight is considered in the design process alongside the issues of overlooking and privacy. This should be achieved by the application of an Article 4 Directive	Sunlight, daylight, privacy and overlooking have been included in the design policies.
Highgate Society/Highgate Neighbourhood Forum	DMP 7	Future development in the borough should not make the quality of life worse for those living, visiting and working in Haringey.	Noted.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 7	View protection is welcomed, but this needs to extend to the protection of views from out of open spaces.	This is noted. Detailed guidance, including from Open Spaces has been included in Policy DM6 and Appendix A.
Highgate Society/Highgate Neighbourhood Forum	DMP 8	All new developments, town centres, district and neighbourhood centres should be provided with recharge points for electric vehicles.	The London Plan has policies on charging points and Haringey is consistent with these policies.
Highgate Society/Highgate Neighbourhood Forum	DMP 8	Applications for extensions to properties that already have parking spaces should be required to provide recharging points.	The London Plan has policies on charging points and Haringey is consistent with these policies.
Highgate Society/Highgate Neighbourhood Forum	DMP 9	<i>"Where feasible"</i> needs to be carefully defined such that it is 'barrister-proof'.	The protection of buildings with conservation or heritage value is addressed by policies DM12 and DM13. Demolition of other buildings is not always a consideration of policy.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 9	38% of the total energy used in manufacture of materials of the building is 'embodied' and 62% of the energy used during the life of the building is 'energy in use' assuming a life for the building of 120 years (NHBC research). If an applicant proposes to demolish a building in order to build another on the site, a further 38% of embodied energy is lost from the existing building (unless 95% of materials are reused which in most circumstances would prove to be impractical) needs to be taken into account. Thus the percentages change to: Demolition of existing building together with demolition of proposed building at the end of its life is now 55% Energy in use during the lifetime of the building is now 45%	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 9	The last figure is based on a building built to 2010 Building Regulations and includes heating, ventilation but excludes variables such as lighting, appliances, computers, etc.. A zero carbon building would be 100% embodied energy on the same basis.	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 10	Adopt BREEAM 'Excellent' for Major Domestic Refurbishment for retrofit to existing housing and define major refurbishment in this connection. Buildings Regs Part L1B 2013 has a definition which could be used	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 10	Retain SPD Sustainable Design & Construction's timeline for introducing better CO2 reduction targets than Bldg Regs	Noted.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 10	Require electric car points in all Shopping Centres; and in front gardens (you have already covered this)	The London Plan has policy (specifically Policy 6.13Da) on charging points and Haringey is consistent with these policies.
Highgate Society/Highgate Neighbourhood Forum	DMP 10	Recognise that demolition of buildings results in a loss of 55% embodied energy. This loss should be taken into account when considering planning applications to demolish existing buildings	The protection of buildings with conservation or heritage value is addressed by policies DM12 and DM13. Demolition of other buildings is not always a consideration of policy.
Highgate Society/Highgate Neighbourhood Forum	DMP 10	Require statements about use of recycled materials in the Design and Access Statements and condition planning applications to ensure they achieve stated aims	Design and Access Statements refer to the access of buildings and not the use of recycled materials.
Highgate Society/Highgate Neighbourhood Forum	DMP 11	This policy deals well with listed buildings but the Conservation Area section is weak. We feel this is an area where there is inadequate protection and this should be strengthened.	The protection of buildings with conservation or heritage value is addressed by policies DM12 and DM13. Demolition of other buildings is not always a consideration of policy.
Highgate Society/Highgate Neighbourhood Forum	DMP 11	We would like to see the Conservation Area Appraisal for Highgate adopted at the same time as the DMPD so there is no policy gap and to ensure that this is properly enforced.	Noted.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 13	The statement is welcomed but limiting this to 9 storeys does not address the varying locations and impact on streetscape and views where damage can be caused by considerably lower buildings.	Taller buildings impact on communities and a range of factors, including views, wayfinding, public transport accessibility levels and other urban characteristics should be taken into consideration for taller buildings. These are set out in design policies and DM5 deals with the siting and design of tall buildings.
Highgate Society/Highgate Neighbourhood Forum	DMP 13	The Fringes of the Heath Policy, now abandoned, dealt with the impact of tall buildings on open spaces. This should be resurrected and applied to all areas of significant open spaces.	Taller buildings impact on communities and a range of factors, including views, wayfinding, public transport accessibility levels and other urban characteristics should be taken into consideration for taller buildings. These are set out in design policies
Highgate Society/Highgate Neighbourhood Forum	DMP 14	This document is still marked as draft. This should be a fully adopted guideline for inclusion in this policy document.	Basement development is set out in the DM24. The 2015 version of the document is the "Preferred Option".
Highgate Society/Highgate Neighbourhood Forum	DMP 14	One of the major problems encountered is the lack of specialist knowledge within the Council for assessment of specialist reports submitted with basement applications, in particular relating to hydrology. A mechanism, whereby independent assessment of the reports can be carried out and paid for by the applicant needs to be adopted. Until this is in place, the Council is putting itself at	Basement development is set out in the DM24. The 2015 version of the document is the "Preferred Option".

Consultee	Policy	Summary	Council Response
		risk by approving reports with inadequate knowledge.	
Highgate Society/Highgate Neighbourhood Forum	DMP 14	All basement developments should ensure that there are no adverse effects to the water table, flow of underground water, surface water run off, surface water drainage.	Basement development is set out in the DM24. The 2015 version of the document is the "Preferred Option".
Highgate Society/Highgate Neighbourhood Forum	DMP 14	No basement should be constructed which relies on constant pumping of ground water into the drainage system.	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 15	Although sketches of replacement shop fronts this is limited to Listed Buildings. This should be extended to all period buildings within conservation areas.	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	Front gardens have deteriorated severely over recent years. Off street parking preceded the introduction of CPZs and it continues to be provided. These measures have destroyed front gardens and the street scene and many trees and shrubs have been lost along the way. The character of every street in the borough has been changed by the combination of off street parking and larger bins.	Noted.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 17	Impermeable surfaces and loss of vegetation add to water run-off problems	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	The use of front gardens for parking has in the past been deemed to provide some relief on the pressure for parking spaces but this assumption is flawed in so far as the loss of kerb parking space needed to provide access to a front garden is in many case greater than the additional space gained by the additional space(s) in the front garden. It is also not a flexible provision allowing for multiple use, thus further lowering the pool of available parking.	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	The width of the frontage of the houses should also be taken into consideration to avoid situation whereby the extensive provision of off street parking in results in the removal of the majority of on street parking provision.	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	Hwever, there are occasions on main roads with heavy through traffic and continuous parking restrictions, where on street car parking cannot be provided (eg Archway Road and Muswell Hill Road) and in these circumstances, crossovers should be looked at on their merits.	Noted, there are policies which provide detail on this, specifically, DM42, DM43, DM44, DM45 and DM46.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	The other circumstance whereby cross would be permissible is where there is a driveway which allows for multiple parking spaces, though the cross over should be restricted to the width of one car.	Noted, there are policies which provide detail on this, specifically, DM42, DM43, DM44, DM45 and DM46.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 17	The third exception would be in cases of identifiable need such as disability.	Noted, there are policies which provide detail on this, specifically, DM42, DM43, DM44, DM45 and DM46.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	In all cases any applications for crossovers should be subject to consultation and this consultation should include all residents of the street. In addition, the following conditions should be applied: The off street parking is on grade The hardstanding is permeable An electric recharge point for a vehicle or wheelchair is provided No significant planting is removed The opportunity to enhance refuse and cycle storage should be considered at the same time Conservation Areas could be excluded from this exemption	Noted, there are policies which provide detail on this, specifically, DM42, DM43, DM44, DM45 and DM46.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	Other than under the above circumstances we suggest there should be a moratorium on the provision of any other crossovers to provide access to front garden parking	Noted.
Highgate Society/Highgate Neighbourhood Forum	DMP 17	Whilst cycle storage and parking are encouraged, care must be taken over the design of storage visible from the public highway, particularly in Conservation Areas.	Noted, there are policies which provide detail on this, specifically, DM42, DM43, DM44, DM45 and DM46.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	DMP 17	Cycle storage units within front gardens require planning permission and will also be required to be of a high quality design. Storage units should benefit from appropriate placement and screening to minimise the impact on the street scene.	Noted, there are policies which provide detail on this, specifically, DM42, DM43, DM44, DM45 and DM46.
Highgate Society/Highgate Neighbourhood Forum	DMP 20	DMP20 states that employment land is safeguarded but we cannot find policy which adequately supports that statement.	Updated policies safeguard employment land in the DM DPD and the Site Allocations DPD.
Highgate Society/Highgate Neighbourhood Forum	DMP 23	Any loss of green permeable surface should be resisted.	Noted, however covering green permeable surfaces in many instances is permitted development and as such not an area where the DM DPD can provide policy.
Highgate Society/Highgate Neighbourhood Forum	DMP 23	If this does involve building on green space, such as rear gardens, green roofs could be adopted	Green roofs are addressed in Dm31 and DM32, most work undertaken in rear gardens is done under permitted development rights and as such the Council is not able to make policies which influence this.
Highgate Society/Highgate Neighbourhood Forum	DMP 23	All basement development should meet the criteria set down in this section of the Policy	Basement development is set out in the DM24. The 2015 version of the document is the "Preferred Option".

Consultee	Policy	Summary	Council Response
d Forum			
Highgate Society/Highgate Neighbourhood Forum	Section 4	Enforcement is key to the implementation of Policy and without it, the policies are meaningless.	Noted.
Highgate Society/Highgate Neighbourhood Forum	Section 4	Development Control through the planning process needs to be more robust. There is a view that fear of Appeal, particularly by wealthy applicants who are able to marshal considerable resources for an Appeal, lead to inappropriate approvals	Noted.
Highgate Society/Highgate Neighbourhood Forum	Section 4	Planning applications should be determined within the due period. We are seeing too many Appeals on grounds of non determination	Noted.
Highgate Society/Highgate Neighbourhood Forum	Section 4	Where damage to neighbouring properties and/or their amenity has occurred as a result of basement development enforcement action should be taken	Noted.

Consultee	Policy	Summary	Council Response
Highgate Society/Highgate Neighbourhood Forum	Section 4	Amend the clause to allow for the Council to take action where breach....affects <i>public or private</i> amenity.	Noted.