

Haringey Local Plan Pre-submission Response Form

Pre-Submission Consultation 8th January – 4th March 2016

The Council is consulting on four Development Plan Documents (DPDs).

These are the:

- Alterations to the Strategic Policies;
- Development Management DPD;
- Site Allocations DPD; and
- Tottenham Area Action Plan.

They will be submitted to the Secretary of State for Examination in Public later this year. This is your final chance to make comments on the documents.

How to Make Comments

This form is designed for postal comments, if you wish to respond by email, please use the Word compatible version of this form which is available for downloading from the Council's website www.haringey.gov.uk/localplan.

Please note that you need to use a separate Part B form for each comment that you make. Your comments will be considered by a Planning Inspector, therefore they should only relate to the 'tests of soundness' and legal compliance (see guidance note at the back of this form, in the DPDs appendices and on our website for more information).

Complete the form overleaf and return to:

Local Plan team
Level 6, River Park
House,
Wood Green
London
N22 8HQ

Or by email to:

ldf@haringey.gov.uk

Or complete it online at:


www.haringey.gov.uk/localplan

To ensure your comments are considered, please ensure we receive them by 5pm on Friday 4th March 2016.

Next Steps

In the summer of 2016 the Planning Inspector will hold an "Examination in Public" to consider the DPDs and comments made to them. The timetable for the Examination in Public will be advertised when it has been confirmed.

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| | | |
|-------------------------------------|--|--|
| Ref: (for official use only) | Local Plan Publication Stage Response Form |  |
|-------------------------------------|--|--|

Name of the DPD to which this representation relates:

| |
|---|
| Development Management DPD Pre-Submission Version January 2016 |
|---|

Please return to London Borough of Haringey by 5pm on Friday 4th March 2016

This form has two parts:
Part A – Personal Details
Part B – Your representation(s). Please fill in a separate Part B for each representation you wish to make.

Part A

| 1. Personal Details ¹ | 2. Agent's Details | |
|----------------------------------|------------------------------|--|
| Title | Mr | |
| First Name | Andrew | |
| Last Name | Lappage | |
| Job Title (where relevant) | Head of Operations | |
| Organisation (where relevant) | North London Waste Authority | |
| Address Line 1 | Unit 1B, Berol House | |
| Address Line 2 | Ashley Road | |
| Address Line 3 | Tottenham | |
| Post Code | N17 9LJ | |
| Telephone Number | 020 8489 5730 | |
| Email address | Barbara.herridge@nlwa.gov.uk | |

¹ If an agent is appointed, please complete only the Personal Details Title, Name and Organisation boxes, but complete the full contact details for the Agent.

Part B – Please use a separate sheet for each response

Name or Organisation:

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

Paragraph Policy Policies Map
DM30

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

4.(1) Legally compliant Yes No

4.(2) Sound Yes No

4.(3) Complies with the Duty to co-operate Yes No

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty-to-cooperate. Please be as detailed as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

POLICY DM30: NEW WASTE FACILITIES

The Authority considers that there is a lack of clarity regarding what the phrase “to achieve levels” means. As waste facilities will be permitted (or exempt from environmental permitting) by the Environment Agency, the permit will set the prescribed levels for compliance on a range of environmental criteria. The reference to ‘achieving levels’ is unclear in terms of what levels it is referring to and adds confusion given the permitting requirements which will also apply.

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

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at question 5 above where this relates to soundness. (NB please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as detailed as possible.

The Authority suggests that the following changes are made to this policy (the proposed changes are listed in bold italics):

“..... that any impacts caused by the operation of the facility can be controlled to ~~achieve levels that~~ ***such that the facility*** will not have a significant adverse effect on human health and the environment ***in line with regulatory requirements.***”

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

Please note your representation should cover concisely all the information, evidence, and supporting information necessary to support/ justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination

Yes, I wish to participate at the oral examination

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

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in the oral examination.

9. Signature



Date:

15/2/16

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POLICY DM1: DELIVERING HIGH QUALITY DESIGN

Broadly NLWA considers that this policy is sound and the Authority notes the positive changes to this policy since the previous draft which make it more explicit. However, NLWA considers that the policy should recognise that design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development. Paragraph A is not explicit in terms of recognising that the design requirements may be usefully reflective of the nature of the development. For instance, NLWA 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 applied flexibly and should not be used to impose onerous and costly requirements on such developments.

Specifically the design of a new local waste facility should not be subject to the same design requirements as for example the redevelopment of an iconic building in the borough. 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.

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

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The Authority considers that paragraph A should be amended to make this policy workable in practice, as follows, (with the proposed amendments in bold italics):

Haringey Development Charter

A All new development and changes of use must achieve a high standard of design and contribute to the distinctive character and amenity of the local area, ***however design quality expectations should be proportionate, reasonable and appropriate for the setting and context of each development.*** The Council will support design-led development proposals which meet the following criteria:

- a Relate positively to neighbouring structures, new or old, to create a harmonious whole;
- b Make a positive contribution to a place, improving the character and quality of an area ***but additionally reflecting the nature of the development,***
- c Confidently address feedback from local consultation;
- d Demonstrate how the quality of the development will be secured when it is built; and
- e Are inclusive and incorporate sustainable design and construction principles.

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

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