

**Appendix 2.2 - Comments Chapter 3 (DM14-DM24) of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

**Comments on Chapter 3 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Policy Ref	Council Response
818	DM176	Our Tottenham	Affordable housing	Return to 50% affordable housing target. It should be increased to the maximum possible	DM 3.2	The 40% affordable housing target is referred to in the introductory chapter of the DM Policies plan however this policy requirement is set out in the Alterations to the Strategic Policies Local Plan (Policy SP2 - Alteration 49). The borough's latest viability evidence suggests that the existing 50% target is not viable across the majority of site scenarios and that a reduction to 40% is appropriate to ensure that the provision of housing does not harm the delivery of housing.

**Comments on DM16 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
262	DM177	Safestore (Bilfinger GVA)	Density	The policy outlines the importance of optimising housing capacity on individual sites. We support this stance and agree that should residential development come forward on the Safestore site in the future, the site should be optimised to ensure the maximum level of residential units can be provided.	Council welcomes the support for this policy.

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265	DM178	NHS Property Services (Savills)	Windfall	DM16 pledges support for residential development on sites that are allocated within the SA DPD and on windfall sites, where this complies with all other relevant policies within the Local Plan. These representations are therefore in general support of DM16 in acknowledging both the role that allocated sites and windfall sites have in meeting and exceeding minimum housing targets, and therefore no amendments are required to this policy. This is in line with national and regional policy.	Council welcomes support for this policy.
372	DM179	Highgate Society	Loss of housing	Society supports the Council's commitment to resisting the loss of existing housing, but the exemption for equivalent floor space only does not take into account the loss of specific units, and if applied carelessly could lead to net losses of homes.	The Council welcomes support for this policy. The Council considers the approach taken will better address objectively assessed housing needs, by enabling a more flexible approach to housing provision.
525	DM180	Barton Willmore on behalf of Workspace	Support policy	The policy outlines the importance of optimising housing capacity on individual sites. We support this position and consider that should residential development come forward in the future, SA24 should be maximised to ensure an acceptable level of residential units can be provided. Furthermore, the Further Alterations to the London Plan (FLAP) were adopted in March 2015 and plan for a higher number of houses than under the 2011 London Plan. If LBH is to meet the targets outlined, it must optimise well located town centre centres.	The Council has sought to optimise the housing potential of all the sites in the site allocations document and the area action plan, in line with the London Plan. The Council welcomes support for this policy.
584	DM181	Rapleys on behalf of	Clarification needed	We support Policy DM16 (A) which supports and directs proposals for new housing to sites allocated for residential development, including mixed use	The Council believes by definition that mixed use implies a range of uses which in appropriate

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		Lasalle Investment Management, long leaseholders		residential development. However, as noted in our representations on the Site Allocations document, this policy would be ineffective unless the Site Allocations document specifically allocates mixed use development sites, namely the Sites SA23 and SA26, to include residential use	circumstances may include residential.
592	DM182	John Crompton, Chair, Muswell Hill CAAC n Crompton	Windfalls	Can what is meant by windfall here be explained?	<p>Council has added a definition of windfall development to the glossary.</p> <p><b>Amend glossary to add:</b>  Windfall development: is any residential development that is granted consent on land or buildings not specifically allocated for residential development in the Haringey Local Plan</p>
609	DM183	Apcar Smith Planning on behalf of Wedge Investments Ltd	Windfalls	<p>it is considered that Part D should be amended to read:</p> <p>Windfall development will be encouraged where this complies with all relevant policies of this Plan. This is in recognition of The London Plan's reference to not just meeting but exceeding housing targets. It is considered to be more consistent with the reference to "exceed" to specifically <b>encourage</b> windfall development where appropriate.</p> <p>Similarly it is considered that Para 3.3 should be amended to refer to the Borough's <b>minimum</b> strategic housing target within The London Plan.</p>	Windfall developments have been included in the plan as a statement of support for this source of housing.

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610	DM184	Turley on behalf of St. William	Support policy	We are generally supportive of the principles and comments set out in the Development Management Policies that are not highlighted below. Policy DM 2 'Design Standards and Quality of Life', DM 16 'Housing Supply' and DM 18 'Housing Design and Quality' are especially relevant and provide a good framework that is supportive of residential led developments, such as Clarendon Square	Council welcomes the support for this policy.
633	DM185	Anne Gray, Local Resident	Against single story retail	A ban on single storey retail development; all major retail buildings should have flats above and car parking underneath, like the Wood Green Shopping City which was a pioneer development of the 1970s in this regard. Existing single storey retail developments should be targeted for better re-use of their sites, as the Tottenham Regeneration proposals have done for Tottenham Hale retail park.	In line with London Plan policy 3.3, the Council will be seeking to realise the housing capacity through a number of different sources including opportunities for mixed developments in town centres.
644	DM186	Wards Corner Coalition	Loss of affordable housing	The housing policies within the draft Development Management DPD are not adequate and do not provide a sound basis for the Tottenham AAP. For instance, DM16 and paragraph 3.6 makes no mention of lifetime homes and do not distinguish between different kinds of 'floorspace' (DM16 C) – if existing council housing is knocked down and replaced with private housing, the Council's requirement that an equivalent floorspace must be re-provided is meaningless. This policy is highly likely to remove affordable housing and replace it with unaffordable housing at a time of housing crisis.	The Government's housing standards review (March 2015), the Building Regulations review (2015) have revoked lifetime home standards, superseding them with Part M of the new building regulations. The policy is consistent with the London Plan and the Haringey Local Plan: Strategic Policies (adopted March 2013).
694	DM187	Iceniprojects on behalf of Berkeley	Encourage windfalls	Support the Council's recognition that windfall sites will play a role in exceeding housing delivery targets. Windfall fall sites should be seen as a positive opportunity.	Council welcomes supports for this policy. Windfall developments have been included in the plan as a statement of support for this source

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		Homes		Berkeley Homes would support a revision to the policy to that the Council will look upon windfall opportunities positively, wherever possible.	of housing.
698	DM188	Savills on behalf of the London Diocesan Fund	Windfalls (pro)	Supports the role of windfall developments in meeting housing targets.	Council welcomes support for this policy.

### Comments on DM17 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
249	DM189	Hornsey Action Group	Density matrix	Object to the attempts to undermine the clear existing policy commitment of the Strategic Policy for Housing: SP2(1) that new housing in Haringey will meet the density levels set out in the Density Matrix of the London Plan. For example Paragraph 3.9 of DM17 Housing Mix is a clear misrepresentation of this policy.	<p>The Council do not believe Paragraph 3.9 is a misrepresentation. SP2 (1) is written as a list of standards to be considered together rather than in isolation. They are not mutually exclusive.</p> <p>The London Plan density matrix has never been an absolute tool for determining an appropriate density for the development site. It is one tool in the policy armoury for assessing the optimum capacity of a development site.</p>

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262	DM190	Safestore (Bilfinger GVA)	Unit size	<p>We consider that the proposed policy is flawed and is contrary to the spirit of both the NPPF and London Plan. The policy is inflexible in nature and could result in policy burdens on the site which hamper the delivery of development as it does not consider a number of legitimate scenarios that could hamper the delivery of family housing, such as:</p> <ul style="list-style-type: none"> <li>• Taking into account areas where 1 or 2 bedroom units would be more suitable than family housing such as town centres or high density neighbourhoods;</li> <li>• Taking into account the viability of the scheme;</li> <li>• Taking into account the redevelopment of existing buildings which could not be readily converted into family housing.</li> </ul> <p>To ensure that residential or mixed use development sites are optimised, restrictions on the housing mix may prevent this from occurring As such, we consider that the definition of where developments of 1 and 2 units only would be acceptable should be expanded to include considerations such as viability, the appropriateness of family housing in the area and the optimisation of the development site.</p>	<p>The Council do not consider that the policy is flawed or contrary to the spirit of the NPPF and London Plan. The aim of the policy is to ensure mixed and balanced communities across the whole of Haringey and to meet housing needs and there is enough flexibility in the wording to take account of the considerations suggested.</p> <p>Viability is an implicit consideration across the whole Local Plan without explicitly mentioning it throughout.</p>
265	DM191	NHS Property Services (Savills)	Unit size	<p>These representations give general support within draft Policy DM17 to acknowledging and accounting for individual site circumstances and density ranges in line with the FALP, however restricting the development of blocks containing only 1 or 2 bedroom units is inconsistent with the national and regional policy noted above. In particular locations,</p>	<p>Noted. Supporting text has been included to provide further guidance and clarity on this issue.</p>

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				<p>local housing demand, scheme viability, site constraints and the character of the surroundings will mean that the residential development proposing only 1 or 2 bedroom units is the most appropriate and optimal use of the site, and should therefore be supported on the merits of the application proposals themselves rather than applying a perspective policy which might inhibit development coming forward.</p> <p><del>C. The Council will not support mono-tenure developments or proposals which contain a mix exclusively made up of 1 or 2 bedroom units unless they are part of larger developments or within neighbourhoods where such provision would help to address existing imbalances with regard to housing choice.</del></p>	
268	DM192	Colin Kerr and Simon Fedida	HUCS	<p>The policy states that the housing potential of a site 'should have regard to the findings of the Haringey Urban Characterisation Study (HUCS)'. The HUCS is factually incorrect in at least one location, that with which the authors are most familiar.</p>	<p>The Urban Characterisation Study will be reviewed to ensure accuracy of information.</p>
268	DM193	Colin Kerr and Simon Fedida	HUCS	<p>Recommendation: It is suggested that the Council conduct a review of the data in the HUCS Maps of Building Heights,</p>	<p>The Urban Characterisation Study will be reviewed to ensure accuracy of information however the study recommendations will not be revisited. The Council will prepare further technical evidence to support Local Plan policies for tall and large buildings.</p>
268	DM194	Colin Kerr and Simon Fedida	HUCS	<p>Recommendation: The Council should amend the error in the assessed building heights for Barratt Avenue N22 and Station Road (north) N22,</p>	<p>The Urban Characterisation Study will be reviewed to ensure accuracy of information however the study</p>

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					recommendations will not be revisited. The Council will prepare further technical evidence to support Local Plan policies for tall and large buildings.
268	DM195	Colin Kerr and Simon Fedida	HUCS	Recommendation: The Council should amend the 'Building Height General Recommendation' for Barratt Avenue N22 and Station Road	The Urban Characterisation Study will be reviewed to ensure accuracy of information however the study recommendations will not be revisited. The Council will prepare further technical evidence to support Local Plan policies for tall and large buildings.
372	DM196	Highgate Society	Housing mix	As highlighted in our comments on the Housing Strategy (1st February, 2015) we are concerned by the Council's determination that all developments be fully mixed in terms of tenure, size, occupancy profile, etc. This policy ignores the natural choices people make to live in areas of a particular demographic or which provide particular services.	Supporting text has been added to provide guidance and clarity on this issue. It states that proposals should seek to meet local needs and deliver more balance communities. The aim of this policy is to promote mixed and inclusive communities instead of areas of ghettoisation or gentrification.
372	DM197	Highgate Society	Housing mix, site specific consideration	We welcome the Council's pledge to have regard for "individual site circumstances" but urge that consideration of circumstances be placed at the forefront of planning for a housing mix, and not be merely auxiliary to a programme of establishing preordained groupings.	Supporting text has been added to provide guidance and clarity on this issue.
372	DM198	Highgate Society	Housing mix, affordable housing	Sceptical of the intention to seek "robustly" to provide affordable housing in areas where it is under-represented: the paramount objective should be to provide that housing where it is needed and in demand. Affordable housing is currently managed by	The policy aims to ensure that proposals seek to meet local needs and deliver more balance communities, in order to promote mixed and inclusive communities



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				RSLs but the time may come when buy-to-let owners and or investors provide it. Otherwise, such ventures are likely to attract absentee landlords for buy-to-let purposes – experience of the Highgate market, in particular, leaves us in no doubt that this would be a major issue here - and therefore defeat the underlying principles.	instead of areas of ghettoisation or gentrification.
372	DM199	Highgate Society	Housing mix, SHMA evidence	Society is not clear on why the decision has been taken to ignore the findings of the 2014 SHMA which identified the significant shortfall in Borough housing was of 1- and 2-bedroom dwellings. The Council's apparent resolve not to provide developments of this type of housing in favour of much larger houses is bound to lead to sub-letting / subdividing of existing housing units or a rash of HMOs.	Supporting text has been added to provide guidance and clarity on this issue. It states that proposals should seek to meet local needs and deliver more balance communities. The aim of this policy is to promote mixed and inclusive communities.
525	DM200	Barton Willmore on behalf of Workspace	NPPF compliance	Workspace considers that the policy as currently drafted does not meet the flexibility tests within the NPPF. To ensure that residential or mixed use development sites are optimised, there should not be restrictions on the housing mix as this could create deliver problems. The policy should therefore include a caveat related to viability.	The policy is sufficiently worded to allow all development sites to be optimised and does meet the flexibility tests within the NPPF. Consistent with the NPPF, viability is implicit across the whole plan, irrespective of whether it is mentioned in each policy.
566	DM201	Capita on behalf of Capital & Regional plc	Policy conflict	Part C of the policy indicates that the Council will not support mono-tenure developments or proposals that contain a mix exclusively made up of 1 or 2-bed units, unless they are part of larger developments or within neighbourhoods where such provision would help address existing imbalances with regard to housing choice. Part A (a) of the policy states that the suitability of a	In line with the London Plan, achieving mixed and balanced communities across all new developments in Haringey is a key priority of the plan. Communities are often not confined to single development sites, so the policy is wording sufficient to allow mono-

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				proposed housing development would be considered, in part, on the basis of 'individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed'. There is an internal conflict between this part of the policy and Part C. The latter appears to apply an absolute requirement which fails to acknowledge that there may be individual site circumstances, as set out in Part A (a) that militate against such an approach. For example, family sized units may not always compatible with high density and/or high rise town centre schemes. Part C, should be amended to acknowledge this and to provide some consistency with Part A (a).	tenure development sites to come forward but 'individual site circumstances' in this instances means looking beyond the red line boundary of the development site and identifying imbalances in housing mix as part of larger development sites or neighbourhood.
609	DM202	Apcar Smith Planning on behalf of Wedge Investments Ltd	Allocated sites	It is considered that Policy DM17A(d) should be amended to delete the reference to allocated sites. Housing outputs should be optimised on all sites where residential development is proposed, whether or not these are allocated sites, to conform with The London Plan references to optimising housing potential.	Agreed.  <b>Action: Remove the words 'on allocated sites' in Policy DM17A(d).</b>
609	DM203	Apcar Smith Planning on behalf of Wedge Investments Ltd	Mono tenure	It is considered that Policy DM17C should be amended since "mono-tenure" developments should be acceptable on small sites and other sites where it is not feasible or practical to have a mix of tenures. This should be acknowledged in the policy.	The aim of the policy is to ensure mixed and balanced communities across the whole of Haringey and to meet housing needs. Whilst it may not be feasible or practical to achieve this policy on small sites, these are not necessarily justification for not meeting the Local Plan policy and the Council still require the applicant to justify the mix based on a wider

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					consideration of housing provision in the neighbourhood.
610	DM204	Turley on behalf of St. William	Mono tenure	<p>We acknowledge the general comments made in Policy DM 17: Housing Mix. We would like to highlight Part C of the policy which states that mono-tenure developments or proposals which contain a mix exclusively made up of 1 or 2 bedroom units is dependent on the size of the development proposal and the local context of the area. Mono-tenure developments should be welcomed in addressing existing housing imbalances in the area.</p> <p>Wood Green is a predominantly residential area comprising of family housing in the form of townhouses and traditional terraced housing. In areas such as this, mono-tenure developments would contribute to the housing mix within the area as a whole and provide a wider range for various residents. As stated in Part A of the Policy, housing mix is subject to 'individual site circumstances, including location, character of its surrounds, site constraints and scale of development proposed'. This should remain at the forefront of the Council's decision making and would provide sufficient flexibility and viability for developers.</p>	The aim of the policy is to ensure mixed and balanced communities across the whole of Haringey and to meet housing needs . The policy's flexibility will allow proposals to be determined on a case by case basis.
628	DM205	DP9 on behalf of Tottenham Hotspur	Supports smaller units	Supports recognition that residential schemes comprising only of 1 and 2 bedroom units can be acceptable if they are part of a larger development or within neighbourhoods where such provision would help to address existing imbalances with	The Council welcomes support for this policy.

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		Football Club		regards housing choice.	
629	DM206	DP9 on behalf of undisclosed	Density	Supports the principal that housing potential of sites be optimised with density justified through a rigorous design-led approach. It will be essential that developers maximise development potential on sites to maximise wider social and community benefits.	The Council welcomes support for this policy.
659	DM207	Haringey Federation of Residents Associations (HFRA)	Family sized houses	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.	<p>Policy DM19 sets out the Council's approach to affordable housing including the requirement to meet the Council's preferred housing size mix in the Haringey Housing Strategy. This will ensure that all new affordable housing will meet housing needs and the preferred mix can be easily amended to reflect changes in identified needs.</p> <p>The Plan is seeking to protect the existing stock of family housing through the introduction of a 'Family Housing Protection Zone' DM22. Although this is not a policy targeting new builds, protecting family housing will ensure increased housing choices for families in Haringey.</p>
694	DM208	Iceniprojects on behalf of Berkeley	Density	As outlined for Policy SP2, this approach to density is unsound, as it is not consistent with national policy. Although it is agreed that development proposals should be design-led, the key consideration for any	The Council believes Para 3.9 is not inconsistent with National Policy and adequately reflects the principle that the London Plan

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		Homes		<p>development should not be density, which is simply a calculation of the number of homes against the size of unit, but of the residential quality of the proposed development and the place it will create, in its context. The proposed policy notes that density will be applied in line with the London Plan Policies; however, Mayoral guidance (Mayor's Housing SPG) clearly states that the density policy and matrix set out in the London Plan should not be utilised in a prescriptive manner and that where appropriate, higher densities should be achieved.</p> <p>The Haringey Urban Characterisation Study 2014 is helpful but should only be used in practice as an indicative baseline guide to development and the policy should be updated to reflect this.</p> <p>An assessment should be made on a case-by-case basis having regard to the quality of the design, the mix of uses and the amount and quality of public realm and open space.</p> <p>Para 3.9 of the supporting text suggests an approach such as this but the wording of the Policy itself should be relaxed, to allow easy application.</p>	<p>density matrix is one policy tool to be used for assessing the appropriate density of a development site. The policy recognises and supports all the concerns raised in the representation, including recognition that the Urban Characterisation Study is guidance and not policy which is explained in para 2.9 in this document.</p>
698	DM209	Savills on behalf of the London Diocesan Fund	Mono-tenure	<p>It is considered that restricting mono-tenure developments is inconsistent with the national and regional policy. In particular locations, local housing demand, scheme viability, site constraints and the character of the surroundings will mean that the residential development proposing mono-tenure developments (e.g. all 4 bedroom units) is the most appropriate and optimal use of the site to meet market demand, and should therefore be supported on the merits of the application proposals themselves rather than applying a perspective policy</p>	<p>The policy has been amended to remove the term 'Mono tenure'. Supporting text has been added to provide further guidance and clarity on this issue.</p>

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				which might inhibit development coming forward.	
799	DM210	Bob Lindsay-Smith	Social housing; affordability	<p>What does 'better mix of social housing' in Section 3.15 mean? If it means that the total number of social housing units would be reduced, that is a kick in the teeth for people who have been waiting for a place for years. Intermediate housing is promised, but NO social housing is mentioned in Policy AAP2 Housing, paragraph B subsection b. Maybe it contains a misprint: It says 'the affordable tenure split (DM17 A(c)) which in the case of development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% affordable rented accommodation.' Perhaps it should read '... development in the Tottenham AAP area will result in an overall tenure mix of 60% intermediate accommodation and 40% social rented accommodation.' That would make social housing 40% of 50% of the total - ie 20% of all housing.</p>	<p>The aim of the policy and the Tottenham AAP is to ensure mixed and balanced communities across all housing tenures in Tottenham. A better mix of social housing is a mix which provides the opportunity to improve the quality of life of neighbourhoods and improve housing conditions, and one which increases the housing choice and capacity for a range of household sizes, including re-housing families into suitably sized accommodation.</p> <p>Affordable rented accommodation is by definition (NPPF and London Plan), a social housing product, albeit, charged at rents up to 80% of market rents. In accordance with national policy and the London plan, all new affordable housing will be charged at affordable rents rather than social rents, to be determined on a site by site basis. The priority of intermediate housing is aimed at achieving a better mix of tenures across Tottenham.</p>

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799	DM211	Bob Lindsay-Smith	Social housing	Having less social housing in the East implies a reversal of the current East-West poverty/prosperity trend. No-one has been asked whether that is desirable, or if so, achievable.	This draft document is seeking the views of communities and stakeholders on the policies proposed. The Plan is intended to address the current East-West trend and balance tenures across the whole borough.
818	DM212	Our Tottenham	Social housing	Reword to guarantee NO NET LOSS of social housing units and no displacement of existing tenants as part of any plan for an estate. The word 'affordable' is misleading, as it cannot be equated with 'social'. Social housing units which may be demolished should only be replaced with social housing units, like-for-like, and not by other forms of 'affordable' housing which are not social renting.	In order to improve the condition, quality and choice of social housing on individual housing estates, re-provision on a habitable room basis will ensure the re-provision of social housing better addresses housing needs in particular, the need to re-house families in suitably sized properties.
818	DM213	Our Tottenham	Regeneration principles	<p>The following principles need to be CLEARLY embedded in the sections and policies on housing estate renewal:</p> <ul style="list-style-type: none"> <li>- No estate regeneration programme should go ahead without a meaningful and fair process of consultation, involvement and empowerment of the existing residents as the drivers of all the decision-making related to their homes.</li> <li>- Such programmes should prioritize improvements to the existing housing estates and their amenities (e.g. finish the Decent Homes Works, concierges, landscaping, community facilities), for the benefit of the current occupants.</li> <li>- There should be no demolition of structurally</li> </ul>	Consultations on estate regeneration programmes and prioritising improvement programmes are outside the scope of this Local Plan. However, all planning applications, in accordance with Paragraph 2.7 of this Plan, are required to engage with the local community as an important part of the design proposal.

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				sound homes, absolutely NO NET LOSS of social housing unit and no displacement of existing tenants as part of any plan for an estate.	
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## Comments on DM18 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
268	DM214	Colin Kerr and Simon Fedida	Housing	The policy requires that new housing 'meet or exceed the minimum internal and external space standards of the London Plan'. Concerning external space, Haringey has particular issues concerning a deficiency of Open Space, documented in the Haringey Open Space and Biodiversity Study Final Report. The London Plan and Mayor's Shaping Neighbourhoods: Play and Informal Recreation SPG 2012, offers Boroughs the opportunity to insert locally agreed benchmarks for play space requirements that reflect boroughs' own specific circumstances (Shaping Neighbourhoods: Play and Informal Recreation SPG, paragraph 4.24 page 57 and space calculator page 49).	The Mayor's Shaping Neighbourhoods SPG includes a standard for children's play space which the Council considers is appropriate for Haringey.
268	DM215	Colin Kerr and Simon Fedida	Housing	Recommendation: The Borough should consider developing locally appropriate standards for play space to reflect its local priorities, as recommended by the London Plan Shaping Neighbourhoods SPG paragraph 4.24.	The Mayor's Shaping Neighbourhoods SPG includes a standard for children's play space which the Council considers is appropriate for Haringey.
372	DM216	Highgate Society	Policy implementation	Support the drive for quality of design in all new housing developments. However, definition of "high quality", particularly in terms of exterior design, is highly subjective, requiring detailed knowledge of the character of an area. There should be a	Policy DM1 sets out the principles of the Haringey Development Charter and the Council's expectations for high quality design. The supporting text signposts that early



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				commitment to meaningful pre-application discussion with the local community on design issues.	engagement with the local community is an important part of the design process.
372	DM217	Highgate Society	Residential extensions, support	Support proposal to control the design of extensions, especially with regard to historic buildings and heritage environments	The Council welcomes support for this policy.
372	DM218	Highgate Society	Residential extensions, objection	Do not agree with the intention outlined in paragraph 3.11 to support generally the adaptation of homes by enlargement or extension to meet changing needs of the residents.	The Council considers that the approach is in conformity with the London Plan in seeking to ensure that housing developments are able to meeting the changing needs of residents over their lifetimes.
372	DM219	Highgate Society	Residential extensions, objection	Particularly in Highgate, DM18 and 3.11 will lead to the erosion of the supply of smaller family homes, and their replacement by increasingly larger ones, to the point that the standard property stock within a neighbourhood is permanently distorted beyond the requirements of new buyers or tenants. These larger houses will eventually then only be suitable or viable for conversion to HMOs or subdivision, which is contradictory to the Council's stated aims in DM 20.	The policy sets out standards for proposals for residential extensions to ensure design and space standards are met. Any other development or change of use will be subject to all relevant policies. Additional wording to be added to policy to set out standards and guidance for extensions.
372	DM220	Highgate Society	Residential extensions, loss of garden land, NPPF consistency	Policy DM18 and 3.11 will also lead to the disappearance of garden land, contrary to national policy	The NPPF does not include a presumption against garden development however it provides that local planning authorities should consider the case for setting out policies to resist inappropriate development of residential gardens. A new policy on backland development will be included in the DM policies to ensure appropriate consideration of gardens on

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					development proposals.  <b>Action: Addition of a new policy on backland development.</b>
408	DM221	Mario Petrou	Wheelchair accessible homes	20% of the total new homes should be accessible, raised from 10%	The 10% target is consistent with London Plan policy.
419	DM222	Haringey Liberal Democrat Group	Housing Mix	Haringey Liberal Democrats believe that more homes need to be built in the borough. However that home need to include a mix of different types of housing, including family homes and affordable homes, built to lifetime standards, not just dense high-rise buildings.	The Local Plan seeks to ensure that London's and Haringey's identified housing needs are met through the provision of a range of housing types and sizes. The proposed DM policies will help give effect to these objectives, for example, through the setting of requirements on housing mix and tenure, protecting family housing and ensuring development densities are appropriate to individual site circumstances.
419	DM223	Haringey Liberal Democrat Group	Housing Quality	The council needs to give more thought not just to the number of homes delivered, but their size and quality, and the impact on their surrounding area.	The Local Plan sets policies to ensure that Haringey can meets its strategic housing delivery targets whilst ensuring the provision of a range of housing types and sizes to meet local need. The DM Policies include policy requirements to ensure new development is of high quality design and positively responds to local character.
426	DM224	Thames Water	Housing Design	Thames Water request that the following informative be incorporated in the Policy or supporting text: <b><i>"There may be existing public sewers crossing the</i></b>	The policy to be amended to include reference to the requirement of applicants to consult with relevant bodies as part of the proposals.

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				<b><i>site. If building over or close to a public sewer is agreed to by Thames Water it will need to be regulated by a 'Build over or near to' Agreement in order to protect the public sewer and/or apparatus in question. It may be possible for public sewers to be moved at a developer's request so as to accommodate development in accordance with Section 185 of the Water Act 1989."</i></b>	
589	DM225	Anonymous	Space standards	Space standards in new developments are too small. Can lead to mental illness.	The Council proposes to apply the London Plan internal space standards, which have been tested and found sound through the examination process.
592	DM226	John Crompton, Chair, Muswell Hill CAAC	Rewording	Substitute "must" for "should". <i>(Surely an extension must by definition be smaller than the original building?)</i>	The suggested wording is not considered to change the key policy principle, that residential extensions will be expected to be subordinate in scale to the original building.
592	DM227	John Crompton, Chair, Muswell Hill CAAC	Restricting extensions	Suggest there needs to be something here about the very limited scope for extending flats especially those created through conversion. I.e. Extensions restricted mainly just to the improvement of living conditions in the ground floor flat (ie not adding additional bedrooms etc)	The policy is considered sufficiently robust and flexible. Suggested changes would lead to an overly restrictive policy. No change.
608	DM228	Home Builders Federation	Housing Standards Review	As stated above the Council will need to monitor developments with regard to the alterations to the London Plan. The Council may have to consider whether the Mayor's internal space standards are applicable in Haringey after considering the necessary tests. It is uncertain whether the Mayor or the Council will be allowed to adopt external space	The Council will continue to monitor changes in national and regional policy. Development standards will be subject to outcomes of the Housing Standards Review and any subsequent changes to national policy and Building Regulations as

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				standards. The <i>Housing Standards Review</i> does not allow any other standards other than those covered by the Building Regulations and the optional standards for internal space and water.	well as alterations to the London Plan.
610	DM229	Turley on behalf of St. William	Support policy	We are generally supportive of the principles and comments set out in the Development Management Policies that are not highlighted below. Policy DM 2 'Design Standards and Quality of Life', DM 16 'Housing Supply' and DM 18 'Housing Design and Quality' are especially relevant and provide a good framework that is supportive of residential led developments, such as Clarendon Square	The Council welcomes support for this policy.
633	DM230	Anne Gray, Local Resident	Dormers	Easing of the rules on creating bedrooms in roof spaces; where larger and wider dormers are permitted, a two-bedroom flat or house can often be changed to 3 bed and a 3 bed house to 4 bed, making it easier for existing owner occupiers to accommodate student lodgers or additional family members (newly born children, elders, youth who wish to stay with parents, or youth returning to parents who have been priced out of independent living). This makes for stable communities because it helps people who would otherwise have to move to larger accommodation. Financial incentives could be offered to owners willing to create extra bedrooms in this way, perhaps conditional on simultaneous re-insulation of the roof space and installation of solar power, to contribute to carbon reduction objectives, reduction of fuel poverty and future energy security.	Comments noted. The policy sets out the requirements for extensions including roof extensions. Additional wording to be included to set out the specific design and space standards. The aim of the policy is to ensure high quality extensions where appropriate.
698	DM231	Savills on behalf of the	Separation distances	20m separation between facing windows too restrictive	Noted. This standard to be removed from policy to ensure a more

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		London Diocesan Fund			flexible and robust policy.
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## Comments on DM19 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
372	DM232	Highgate Society	Affordable housing, planning contributions	Concern about phrase “negotiating the level of affordable housing” in paragraph D as it implies the ability of developments to avoid their obligations through manipulating viability assessments and valuations.	The terminology is in line with that used in the London Plan policy on affordable housing contributions. Policy DM19 sets out that the Council will seek the maximum reasonable amount of affordable housing on qualifying development schemes subject to viability considerations. This approach is consistent with the NPPF in ensuring viability and deliverability of development. DM19 sets requirements to ensure a standardised approach to viability assessments is undertaken for all proposals.
564	DM233	Savills on behalf of Archway Apartments	Viability testing	Believes the current wording is not in compliance with NPPF or RICS guidance, specifically that the developer’s return model should not be excluded from the policy as a potential approach.	In line with the London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark approach for determining the level of affordable housing scheme can viably deliver. This approach is well established, accepted through the planning

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					appeal process and is considered to be easily definable based on the current planning land use designation.
584	DM234	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Viability	6.13 Criterion D requires that in negotiating the level of affordable housing provision, viability assessments must be based on a standard residual valuation approach with the benchmark land value taken as the existing/alternative use value. We consider that it is too prescriptive to define the methodology of viability assessments, as it should be considered on a case by case basis, based on RICS Professional Guidance on “Financial Viability in Planning.” This criterion should therefore be amended.	In line with the London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark approach for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land use designation. The RICS guidance is not national policy or guidance.
584	DM235	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Viability	Criterion A refers to the borough-wide target of 40% affordable housing provision. We consider that for development proposals within Haringey Heartland, a lower affordable housing target should be set, to ensure the deliverability of redevelopment schemes to facilitate regeneration of the area.	The Council’s technical evidence indicates that the 40% target is appropriate to ensure that provision of affordable housing does not harm overall housing delivery.
608	DM236	Home Builders Federation	Small Site affordable housing contributions	We note the amendment. The new national policy actually allows schemes of <u>10 and fewer</u> dwellings to be exempted from affordable housing obligations. The text should be re-worded to read “with the capacity to provide 11 or more...”.  We also draw attention to the Written Ministerial	Noted. Policy SP2 will be amended to bring it in line with national planning policy.  <b>Action: Amend policy to clarify this change.</b>

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				Statement dated 25 March 2015 exempting schemes of 10 units and fewer from the allowable solutions element of zero carbon homes. The Council may need to reflect this in the relevant policy.	
610	DM237	Turley on behalf of St. William	Support policy	We note the general comments in Policy DM 19 on Affordable Housing provision for residential developments. We agree and support Part C and Part F of the Policy which states that the Council will seek the maximum reasonable amount of affordable housing provision on sites that can achieve 10 or more dwellings having regard to ' <i>the individual circumstances of the site</i> ' and ' <i>development viability</i> '. We acknowledge the importance of reviewing proposals on a case by case basis and support this approach. Furthermore, this policy is in accordance with The London Plan which recognises that the provision of affordable housing on site is subject to viability. This provides sufficient flexibility to both developers and the Council.	The Council welcomes support for this policy.
694	DM238	Iceniprojects on behalf of Berkeley Homes	Flexible approach	Strongly support the Council's approach to seeking the maximum reasonable amount of affordable housing on a site by site basis and support the reduction in affordable housing to 40%. Suggest it is important that there is flexibility on affordable housing requirements to ensure new housing can be delivered, and be of a tenure which will really encourage long term change.	The Council welcomes support for this policy.
694	DM239	Iceniprojects on behalf of Berkeley	EUV	The RICS guidance is clear that in a planning context, the EUV approach is unsuitable for financial viability assessments. The guidance explains that the method	In line with the London Plan approach, the Council considers that existing / alternative use value is the

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		Homes		<p>is: <i>‘an accounting definition of value for business use and, as such, hypothetical in a market context. Property does not transact on an EUV basis’</i>. The draft Policy should be revised to allow for other methods of accounting for land value, such as the market value approach.</p>	<p>appropriate benchmark approach for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land use designation. The RICS guidance is not national policy or guidance.</p>
694	DM240	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	<p>Object with DM19d). The Policy is unsound and is not consistent with national policy. Viability and deliverability are key to securing national policy’s aspiration of sustainable development, as outlined in Paragraph 173 of the National Planning Policy Framework (NPPF). Land or site value is central to the consideration of viability and the most appropriate way to assess this value can vary. The National Planning Policy Framework is clear that in all cases estimated land or site value should: reflect emerging policy requirements and planning obligations and, where applicable, any Community Infrastructure Levy charge; provide a competitive return to willing developers and land owners; and be informed by comparable, market-based evidence wherever possible. The CLG guidance on section 106 and affordable housing requirement states: ‘Any purchase price used should be benchmarked against both market values and sales prices of comparable sites in the locality’ (Annex A page 7).</p>	<p>In line with the London Plan approach, the Council considers that existing / alternative use value is the appropriate benchmark approach for determining the level of affordable housing a scheme can viably deliver. This approach is well established, accepted through the planning appeal process and is considered to be easily definable based the current planning land use designation.</p>



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698	DM241	Savills on behalf of the London Diocesan Fund	Pro flexibility	Supports flexibility for negotiation contained within this policy	The Council welcomes support for this policy.
818	DM242	Our Tottenham	Affordable housing	We strongly oppose the reduction in the affordable housing requirement for development above 10 units from 50% to 40%. It should be increased to the maximum possible.	The Council's technical evidence strongly indicates that the existing 50% borough-wide target is not viable across the majority of site scenarios tested, and that a reduction to 40% is appropriate to ensure that provision of affordable housing does not harm overall housing delivery.
818	DM243	Our Tottenham	Affordable housing	We question the affordable housing tenure split being proposed (60% affordable rent including social rent and 40% intermediate housing). It is not acceptable to meet affordable accommodation targets only with shared ownership or intermediate rent housing, both of which are out of the price range of low income families. With Government cuts and caps to benefits affecting thousands of local residents, and almost no private tenancies available at LHA rates or below, the desperate need for genuinely affordable housing and social housing generally is of even greater urgency. An affordable home is one that is affordable to any tenant earning the London Living Wage. This means that the only truly affordable form of housing for many low-income Haringey residents is social rented. Affordable' is not	The Council considers that the approach to affordable housing is consistent with national and regional policy by definition. The proposed Local Plan policy reflects the tenure split advocated in the London Plan and is consistent with the Strategic Housing Market Assessment findings as well as the wider objectives of the Local Plan to deliver more balanced communities. The Council has tested the viability of the affordable housing target.

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				80% of a market rent, which is unaffordable to the vast majority of Tottenham residents. We therefore demand that a separate and clear percentage for social rented housing be set in the affordable housing provision target; and 70% of that affordable housing target should be social rented housing.	
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### Comments on DM20 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
372	DM244	Highgate Society	Self-build housing definition	The Council should adopt and enforce a strict definition of “self-build” housing, such that it does not include large scale demolition and rebuilding projects for private ownership. These are highly detrimental to infrastructure, the streetscape integrity and the local amenity of nearby residents, and they bear no relation to the type of schemes originally envisaged by those authorities seeking to offer alternative routes to affordable home ownership.	Self-build housing is defined in the Community Infrastructure Regulations (Amendment) 2014. A definition will be included in the glossary.  <b>Action: Include self-build housing in glossary.</b>
372	DM245	Highgate Society	Self-build housing definition	The term “self-build” and all of its attendant subsidies and support systems should only apply to the construction of entirely new housing stock on agreed sites, and realised by the owner/occupier.	A definition of self-build housing will be included in the glossary.

### Comments on DM21 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
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372	DM246	Highgate Society	Identifying specialist housing need	It is unclear from this policy how an “established need” for new special needs housing will be identified, as the term implies the pre-existence of such housing, and therefore allows little manoeuvring room for provision of new projects in new areas	Need will be identified in different ways according to the type of need and facility proposed. The Council will require the applicant to demonstrate a need through evidence. It is not considered that the policy will not allow for new projects.
372	DM247	Highgate Society	Secured accommodation, safeguarding neighbourhoods	Regarding secured accommodation, we highlight the fact that stated pledges to safeguard neighbourhoods from consequent adverse impacts on local amenities, etc., can in fact only be ensured through the Social Services, parole organisations, the Judiciary, police, etc., all of which bodies are all well outside the control and management of the planning department.	Agreed. The issues outlined in the comments are outside the remit of this Plan. The Policy does not attempt to address these issues, but rather aims to ensure proposals are in appropriate locations and meet design and space standards.
414	DM248	GLA	Special Needs Housing	It is noted that the council will have regard to the London Plan’s monitoring benchmarks for the provision of specialist housing for older people, this is welcomed. However, the 2015 London Plan is clear that boroughs should identify and address the need for specialist older person’s accommodation, including through targets and performance indicators. In addition, para 3.50C states that Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites. It is suggested that Policy DM21 and supporting text should be updated to address this.	Agreed. Supporting text amended to include suggested wording.
414	DM249	GLA	Student Accommodation	Paragraph 3.25 states, ‘whilst the Council supports the need to provide a choice of housing, student accommodation does not currently form part of Haringey housing needs.’ This statement is surprising	Policy amended as suggested. Supporting text to be amended to include reference to London’s

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				<p>given that Haringey's Strategic Housing Market Assessment (SHMA) 2014 states in para 4.29 that 'the 2011 Census recorded 551 student households within Haringey'. It is noted that Haringey's SHMA contains no further assessment of student housing in the borough.</p> <p>The London SHMA 2013 recognises that 'it is neither appropriate nor feasible to identify the housing requirements of students with the same methodology as employed for the population as a whole'. It therefore uses the projections of the growth in full-time students in London developed by Mayor's Academic Forum to assess student housing requirements. Based on the Mayor's Academic Forum's projections the London Plan 2015 sets a strategic requirement for London of 20,000 – 31,000 student accommodation places over the 10 years to 2025.</p> <p>London Plan Policy 3.8 B(h) requires boroughs to meet strategic and local requirements for student housing, and this should be reflected in the borough's Local Plan policy. Therefore, it is suggested that the council add the following underlined text to Policy DM21 part C: 'Where further student accommodation is required <b>to meet local and strategic need</b>, it will be supported as...'. </p>	strategic requirement for student accommodation.
584	DM250	Rapleys on behalf of Lasalle Investment Management, long	Support policy	<p>Criterion C supports student accommodation to be delivered as part of new major development schemes in Haringey Growth Areas and Areas of Change, if a requirement for further student accommodation is identified in the future. We support this aspect of the policy, as student accommodation could be delivered on long term</p>	The Council welcomes support for the policy.

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		leaseholders		redevelopment opportunity sites in Haringey Heartland such as our client's sites.	
584	DM251	Rapleys on behalf of Lasalle Investment Management, long leaseholders	Link to education institutions	Criterion D sets out criteria based assessment for proposals for student accommodation. We object to criterion e as it is considered onerous to require all student accommodation proposals to be made available for occupation by members of a specified educational institution(s). We therefore request that this criterion is removed.	Disagree. This criteria is in line with London Plan and is considered appropriate for the borough.
586	DM252	Tina Nicos, resident	Elderly people accommodation	Concerned about the provision of elderly accommodation in the borough, that there might not be enough.	Noted. The aim of this policy is to support new housing for older people and other groups with specialist housing needs where a need is identified. It will also ensure good quality housing, which is safe and accessible.
633	DM253	Anne Gray, Local Resident	Elderly housing	A higher proportion of new dwellings should be specialist accommodation for the elderly, made available as attractive leasehold flats to encourage elderly owners of large homes to sell and downsize. special financial, brokerage and advice measures could be put in place to encourage social landlords to offer to purchase large owner-occupied homes from elderly owners whose accommodation is too large for their needs and offer them opportunities to move to smaller leasehold properties, possibly out of London	Issues of ownership and management of housing is beyond the remit of this Plan and the planning process sand will be dealt with by the Housing providers.

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Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
258	DM254	Ladder Community Safety Partnership	Family Housing Protection Zone	LCSP members familiar with overdevelopment problems due to excessive conversion, subdivisions and HMOs in Ladder roads. It would be a pity to replicate these problems in new developments. Welcome proposed Family Housing Protection zone. Hope it will be more effective than current Ladder Restricted Conversion zone (UDP, HSG11c) which has all too often failed to prevent conversion of family houses into smaller units.	The Council welcomes support for this policy.
268	DM255	Colin Kerr and Simon Fedida	Family Housing Protection Zone	The thrust of part B is that conversions in the 'Family Housing Protection Zone' will only be acceptable if one of the resulting units is a 3-bed unit. Outside the FHPZ the conversion will only be acceptable if the 'original floor space' exceeds 120m2. The effect of this policy is to remove the 'original floor space' constraint for candidate conversion buildings in the FHPZ. This potentially allows smaller family homes to be converted inside the FHPZ than outside the FHPZ. This is surely the opposite effect to that intended. An 'original floor space' standard is needed in the FHPZ.	Noted. The policy has been amended to reflect that the floorspace requirement is a consideration within the Family Housing Protection Zone.
268	DM256	Colin Kerr and Simon Fedida	Family Housing Protection Zone	Recommendation: The Borough should consider whether the policy as currently constructed will protect family housing in the FHPZ as intended or not, and amend the text accordingly. It should consider an 'original floor space' standard in the FHPZ.	The proposed policy includes an original floorspace standard as set out in DM22.A.b
372	DM257	Highgate Society	Residential conversions	The Council's resistance to permitting residential conversions is not in keeping with its policies of a) allowing continued extension and enlargement of smaller family homes and b) opposition to the	Please note the reference to 'the gross original floorspace' in DM22A(b).

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				building or development of 1 and 2 bedroom dwellings. These two latter policies will inevitably lead to a diminishing of smaller dwellings with a resultant increase in exactly the type of property that is most likely to be sub-divided and converted	
372	DM258	Highgate Society	Garden land, open space	Unclear on how the existing garden of a converted property can be available to all residents, as the Council ideal is to have it completely parcelled out, which ultimately would degrade it as a green or open space.	Noted. Policy 22.C will be amended to provide further clarity on the matter of amenity / garden space in residential conversions.
589	DM259	Anonymous	Supports policy	Please do stop houses being converted into flats, especially very small terraced homes, one because many properties are simply too small and therefore not desirable for those forced to live in them, and also the streets become an eyesore with too many bins overflowing and lining the street.	Policies DM22 and DM23 set out requirements to manage conversions in order to help maintain a supply of family dwellings. The policies include floorspace thresholds to ensure that converted dwellings are of an appropriate size.
592	DM260	John Crompton, Chair, Muswell Hill CAAC	Subdivision of gardens	Not sure that physical sub division of gardens is the best solution; it could be very unsightly and this might mean it made a negative contribution to a CA.	Where residential conversions are proposed the Council will seek to optimise the total amount of private amenity space and access to this space for residents, having regard to site circumstances. DM22 will not be considered in isolation of other policies on the historic environment.
592	DM261	John Crompton, Chair, Muswell Hill	Support Para	Specifically 2.29	The Council welcomes support for this policy.

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		CAAC			
597	DM262	Mary White, local resident	Support Policies	Policy DM22 Residential conversions and DM23 Houses in Multiple Occupation as these have had a negative effect on the community in Woodside Ward where I live. Residents have been detrimentally affected by conversions of relatively small houses which have been within permitted development, but then converted into flats or houses in multiple occupation which has led to the overpopulation of neighbourhoods with resulting lack of privacy and amenity to some homes, rubbish dumping, noise and other nuisance as well as parking problems. Many of the houses in multiple occupation are not registered as such, and some have brick buildings in the back gardens which are also used as housing and this adds to the problems and leads to changes in the neighbourhood from single family homes to those housing large numbers of residents	The Council welcomes support for this policy.
730	DM263	Parkside Malvern – Marcus Ballard	housing	The LDF should bring forward policies to ensure existing smaller single family dwellings are not converted, to ensure, overall the area (and the wider area encompassing development sites adjacent to our area) has a substantial number of family dwellings with gardens.	Policies DM22 and DM23 set out requirements to manage conversions in order to help maintain a supply of family dwellings.

## Comments on DM23 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
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372	DM264	Highgate Society		While the Council recognises the potential of HMOs to lead to a deterioration of amenity and local character, Society suggest it is better <i>not</i> to allow the overdevelopment of sites in the way of enlargement and extension, which could easily lead to a growth of large properties, ill-suited to their neighbourhoods, and consequently only fit for subdivision.	Policy DM1 seeks to ensure that development proposals positively respond to local character. The proposed DM policies on residential extensions and conversions set further detailed requirements in this regard.
408	DM265	Mario Petrou	Management of HMOs	Policy should require owners to produce management plans including contacts if the occupants are causing nuisance or anti social behaviour or the building is in disrepair.	This is outside the scope of the Local Plan.
564	DM266	Savills on behalf of Archway Apartments	Unduly restrictive	We consider that the policy should also consider site specific constraints. It should allow for greater consideration of the benefits of regeneration and should balance the benefits of the provision of high quality residential or mixed use redevelopment against the loss of poor quality HMOs. In its present wording, the policy is considered to be unduly restrictive and does not allow for the proper consideration of regeneration benefits within the wider borough that may be brought about through the redevelopment of poor quality HMOs. We therefore consider that the policy should be reworded to acknowledge the benefits that redevelopment of these sites could bring, including the delivery of high quality market and affordable housing.	The policy is intended to protect and encourage good quality HMO accommodation to support a specific and small but important part of the housing market, which is essential for ensuring labour market flexibility and meeting housing need in Haringey. The Council considers that the policy provides sufficient flexibility to enable redevelopment in particular circumstances.
597	DM267	Mary White, local resident	Support Policies	Policy DM22 Residential conversions and DM23 Houses in Multiple Occupation as these have had a negative effect on the community in Woodside Ward where I live. Residents have been detrimentally affected by conversions of relatively	The Council welcomes support for these policies. Woodside Ward is proposed to be included in the Family Housing Protection Zone associated with DM22 and is within

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				small houses which have been within permitted development, but then converted into flats or houses in multiple occupation which has led to the overpopulation of neighbourhoods with resulting lack of privacy and amenity to some homes, rubbish dumping, noise and other nuisance as well as parking problems. Many of the houses in multiple occupation are not registered as such, and some have brick buildings in the back gardens which are also used as housing and this adds to the problems and leads to changes in the neighbourhood from single family homes to those housing large numbers of residents	the Article 4 Direction area for Houses in Multiple Occupation. Unauthorised development is a planning enforcement matter and outside the scope of the Local Plan.
659	DM268	Haringey Federation of Residents Associations (HFRA)	Object to HMOs	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 accommodation but also unacceptable over-crowding.	In order to better manage the development of Houses in Multiple Occupation, the Council introduced an Article 4 Direction in November 2013 which removed permitted development rights for conversion to small HMOs within the east of the borough. Policy DM23 sets out requirements for HMOs of six or more people across Haringey as well as proposals for smaller HMO within the east of the borough.

### Comments on DM24 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
372	DM269	Highgate Society	Support for a basement	Welcome proposal for borough wide basement policy.	The Council welcomes support for this policy.

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			policy		
372	DM270	Highgate Society	Consultation	Would like to be involved at all stages of policy development in order to present findings experiences.	The Council invites the public to comment on its Local Plan consultations, which are carried out in line with the Council's adopted Statement of Community Involvement and the Town and Country Planning (Local Planning) (England) Regulations 2012.
372	DM271	Highgate Society	Basement development criteria	Question how a basement could safeguard the structural stability of the property, and therefore be permitted, as outlined in paragraph A.a. Furthermore, no basement construction can be carried out <i>without</i> flood risk, adverse impact on amenity of neighbours, damage to townscape trees and significant increase in traffic congestion during construction. Therefore, we can only presume that these parameters are fully flexible, and urge the Council to lay down specific and unfringeable restrictions on basement excavations.	<p>The Council considers that policy will provide sufficient control over basement development whilst not being unnecessarily prescriptive, having regard to local circumstances. The Council agrees that aspects of the policy should be amended to better clarify expectations for relevant proposals.</p> <p><b>Amend DM24A(a) as follows:</b>  <del>Is designed to safeguard</del> <u>Will not adversely affect</u> the structural stability of the application building, neighbouring buildings and other infrastructure, including adjoining highway, having regard to local geological conditions.</p> <p><b>Amend DM24A(h) as follows:</b>            Will not cause <u>unacceptable</u> harm <u>to</u> pedestrian, cycle, vehicular and road safety, <u>adversely</u> affect bus or other</p>

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					transport operations, significantly increase traffic congestion, nor place unreasonable inconvenience on the day to day life of those living, working or visiting nearby.
372	DM272	Highgate Society	Other local authority basement policies	Camden Council is currently in the process of accepting strong basement rules modelled on those now in force in Kensington and Chelsea, and we would strongly urge that Haringey adopt a policy modelled on that	The Council considers that the proposed basement policy is sufficiently robust and appropriate to local circumstances.
421	DM273	Historic England	Basements	We would seek to ensure that the policy makes reference to the significance of heritage assets as part of the test criteria.	Noted. The Council considers that heritage assets are covered by criterion H of the proposed policy, which makes reference to the historic environment. The policy will also be considered in conjunction with Policy DM12 (Management of the Historic Environment). <b>No change.</b>
426	DM274	Thames Water	Basements	Thames Water consider the risk of flooding as a result of basement development should be made clearer and require mitigation to overcome this along the lines of the following: <b><i>“Thames Water requests that all basement development incorporates a positive pumped device or other suitable flood prevention device to avoid the risk of sewage backflow causing sewer flooding. This is because the wastewater network may surcharge to ground level during storm conditions. Such measures are required in order to comply with paragraph 103 of the NPPF which</i></b>	The policy includes requirements for managing flood risk, which must be considered along with other relevant DM policies. The policy sets out applicants will need to demonstrate that proposals do not increase flood risk to the application property and nearby properties.  Supporting text amended to provide further guidance.

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				<i>highlights the need to avoid flooding and also in the interests of good building practise as recognised in Part H of the Building Regulations.”</i>	
592	DM275	John Crompton, Chair, Muswell Hill CAAC	Rewording	A -insert the word “only” after “will” C- does it need something about safety –ie designed so that a child or visitor could not accidentally fall into a light well.	<p>Agree. Point A will be amended as suggested. The Council considers that principles of safe design are covered by Policy DM2.</p> <p><b>Amend DM24 as follows</b>  A. Householder extensions to existing basements or the construction of new basements in existing dwelling will <u>only</u> be permitted where it can be demonstrated that the proposal:</p>