

## Appendix 2.3 - Comments on the Environmental Sustainability section (DM25-45) of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

## Comments on DM25 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
410	DM277	North London Waste Authority	Balancing Employment and Nature Conservation	NLWA 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, where it would appear appropriate for Policy to explicitly note the need to strike a balance between the objectives of different designations. The Authority considers that this balance may be achieved in part through biodiversity offsetting, which is widely used in other countries and is not the subject of a Defra pilot programme.	<p>The balance between competing land use requirements is determined by the adopted spatial strategy, which the DM policies seek to give effect to, and by the presumption in favour of sustainable development, which requires that important or significant areas for nature conservation are not adversely impacted by development. The policy will be updated to make clear the priority for protection and enhancement of nature conservation sites. Biodiversity offsetting will be included as an example of a mitigation measure to the supporting text.</p> <p><b>Action: Amend policy to set clear the priority for protecting and enhancing nature conservation value of the site. Update supporting text to reflect mitigation measures.</b></p>
410	DM278	North London Waste Authority	Balancing Employment and Nature Conservation	NLWA considers that reference should be made within the supporting text for this policy to the relevance of nature conservation designations. In particular if the nature conservation designation evidence is out-of-date, e.g. where surveys have not been carried out in the past 2-3 years, then nature conservation sites should be re-surveyed and the designations reappraised for accuracy.	<p>Noted. A supporting paragraph will be added to briefly explain nature conservation designations. The resurveying of nature conservation designations is outside the scope of the development management policies.</p> <p><b>Action: Add supporting text to explain nature conservation designations.</b></p> <p><b>Action: Amend glossary to add a definition of SSSI</b></p>
422	DM279	Environment Agency	Access to nature	We feel part A. b of this policy could be misinterpreted. Is the aim of the policy to improve access to nature for humans/wildlife or both? Paragraph 4.2 states that the Council intends to facilitate linking of the borough's open and green spaces and to strengthen the network of green infrastructure for the benefit of the environment and local communities so we assume that the policy means for both.	The DM policies seek to improve access to nature for both wildlife and people.
422	DM280	Environment Agency	Enhancement	The focus of this policy appears to be on seeking mitigation for applications where a negative impact cannot be avoided. The policy would be improved by outlining that the first priority is for sites to be enhanced and protected in line with policy 7.19 of the London Plan and reflect supporting paragraph 4.8.	<p>Noted. The policy will be updated to make clear the priority for protection and enhancement of nature conservation sites, whilst making appropriate provision for mitigation measures where necessary.</p> <p><b>Action: Amend policy to set clear the priority for protecting and enhancing nature conservation value of the site.</b></p>
624	DM281	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.

## Comments on DM26 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
265	DM282	NHS Property Services (Savills)	Significant local open land	A definition of SLOL should be included in the emerging DPD, however this should be defined by LBH. Any land that is considered for designation as SLOL should be identified through evidenced assessment.	Council agrees and has included a definition of significant local open land. <b>Action: Amend glossary to include SLOL definition</b>
265	DM283	NHS Property Services (Savills)	Enhancement	Nowhere in DM26 is there mention of any consideration given to the replacement or enhancement of existing open space provision as part of a development scheme which is likely to provide for better quality and better used open space provision. Development proposals that enhance existing open space areas should be actively supported to include where small scale development is directly related to an existing land use provided it does not undermine the character or use of the open space.	Open space is protected from inappropriate development by Local Plan policy SP13. The Council considers there is scope to set further requirements having regard to Paragraph 74 of NPPF, which provides that existing open space should not be built on unless the loss from development would be replaced by equivalent or better provision in terms of quality and quantity. <b>Action: New policy criteria on reconfiguration of open space to allow greater flexibility for consideration for enhancing quality and amount of open space.</b>
265	DM284	NHS Property Services (Savills)	Enhancement – proposed change	<i>A. The Council will not grant planning permission for proposals for development that would result in the loss of <b>public</b> open space, unless an assessment has been undertaken which shows that the open space is surplus to all the functions that an open space can perform <b>or the development is directly related to an existing land use within the open space.</b></i>	Local Plan policy SP13 sets out the open space typologies that will be protected from inappropriate development by, which the DM policies will give effect to.
265	DM285	NHS Property Services (Savills)	Enhancement – proposed change	<i>B. The Council will require all residential development proposals in Areas of Open Space Deficiency (see map 4.1), and in wards which fall below the Borough-wide target of open space of 1.64ha per 1,000 population (see map 4.2) to provide new open space and/or make financial contributions to enable the provision of new open spaces or improvements to the accessibility and quality of existing open space <b>where viable.</b></i>	Noted. Viability considerations are implicit across the plan and it is therefore not considered necessary to signpost this in all individual policies.
265	DM286	NHS Property Services (Savills)	Enhancement – proposed change	<i>C. The Council will only grant planning permission for small-scale structures on Designated Public Open Space (Green Belt, Metropolitan Open Land, Significant Local Open Land or Lee Valley Regional Park as shown on the Proposals Map) where the development is directly related and ancillary to any recreational or <b>other existing</b> use of the land and the predominant open character of the open space is maintained.</i>	Noted. The policy will be updated to reflect that ancillary development is not exclusive to recreational uses, but uses that support the character and function of the open space. <b>Action: Amend policy to clarify the ancillary uses that may be acceptable on open space.</b>
265	DM287	NHS Property Services (Savills)	Open space assessment	DM26 is too restrictive in requiring open space assessments to justify the loss of undesignated open space due to the fact that 1) designated open space areas where LBH have undertaken an open space assessment and concluded they are areas of open space value would remain protected, and 2) undesignated open space with no public access is likely to be of limited open space value anyway and would have been discounted by LBH in previous assessment. The impact of the current wording could therefore unnecessarily delay or prevent development proposals from coming forward.	National Planning Policy Framework paragraph 74 requires that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space is surplus to requirements. This policy does not state that the assessment must be undertaken by the applicant. In situations where a council assessment has been undertaken and deemed the land surplus to requirements this would be considered sufficient.
265	DM288	NHS Property Services (Savills)	Significant local open land	First, there is not adequate definition or evidential justification supporting the draft designation of SLOL (to include the definition of its boundaries). Furthermore, SLOL is not a type of open space as identified within FALP Table 7.2. In particular there are small areas	A definition of SLOL will be included in the glossary to this policy. <b>Action: Addition of SLOL definition in glossary</b>

				(namely the walled garden area at THS, Highgate) which are included within this wider draft designation but which are not publicly accessible open spaces, nor have they been identified as having any local open space value in any recent evidence base documents. On this basis, and in connection with draft Allocation SA45, these representations have made suggested modifications to the boundaries of the SLOL designation.	
268	DM289	Colin Kerr and Simon Fedida	Significant local open land	The DM26 part C references Significant Local Open Land. It is not clear that this classification still exists: certainly there is no current listing of SLOLs in the Borough that has not been superseded. The Haringey Open Space and Biodiversity Study 2014 does not provide a list. Recommendation: The status quo list of SLOLs should be included as an Appendix to the DMP-DPD. The Appendix should also include for reference Historic Gardens, SLOLs, MOLs and so on. The Haringey UDP2006 Schedules 9, 10, 11, 13 are an excellent example to follow.	The Open Space and Biodiversity Study 2014 sets out that the lists of open space types are provided in the Community Infrastructure Study 2010 (paragraph 2.32). The infrastructure study lists 25 sites as SLOL (page 57).  <b>Action: Include a schedule of designated Open Land, including opportunities for projects to improve their quality and access will be included in the IDP.</b>
342	DM290	Janet Evans	Encroachment	There should be no encroachment on all parks as they will become even more essential to meeting needs of a growing population	Noted. DM26 E states that development adjacent to open space should protect and enhance the character of the open land. Council considers that the DM Policies will ensure developments do not adversely impact on the character and function of parks and open space.
376	DM291	Highgate School	Clarification	The latter section of the policy, i.e. “ <i>the open space is surplus to all the functions that an open space can perform</i> ” is ambiguous and needs clarification. This wording is not clear and does not identify any standards against which it can be measured. This part of the policy needs to either be re-worded to make clear what ‘ <i>all functions</i> ’ are, or needs to refer to adopted guidance such as the NPPF paragraph 74.	Noted. Policy text amended to bring it in line with NPPF.  <b>Action: Amend policy text to be consistent with NPPF paragraph 74.</b>
376	DM292	Highgate School	Educational facilities	DM26, section D does not currently acknowledge the role of open space for the purposes of education. Sport is a vital part of the National Curriculum and School’s may have requirements to create or improve small scale ancillary developments to enhance these facilities. To introduce flexibility and allow for improvements and enhancements to educational facilities, we request that policy DM26 section D should read as follows: “The Council supports the provision and improvement of outdoor open space and leisure facilities. Small scale ancillary developments which enhance the park and open space offer, such as refreshment facilities, public conveniences, <b>changing facilities and spectator facilities</b> , public art installations, <del>or</del> outdoor play and fitness equipment, <b>or to meet the special needs of education</b> , will be permitted, provided that they are ....”	It is considered that the policy is sufficiently flexible to allow new or enhanced ancillary uses for sport, irrespective of whether they are linked to education facilities.
408	DM293	Mario Petrou	Allotments	Reference should be made to allotments, their value and availability	The supporting text states that allotments are within the typologies of open space within the Strategic Policies.
413	DM294	Natural England	Special protection areas	We note the comment at page 46 that “open spaces (are) becoming more intensively used and (are) increasingly important to serve Haringey’s growing population in terms of leisure provision ..” and that the Lee Valley Regional Park is listed as one of the open spaces which can be used for this purpose. We would emphasise, however, that parts of the Lee Valley Regional Park are Special Protection Areas (SPAs) and as such are strictly protected sites under European legislation, classified for rare and vulnerable birds and for regularly occurring migratory species.	Noted. Council will work with Lee Valley Regional Park Authority on any proposals within or in the vicinity of Special Protection Areas to ensure development does not impact adversely on these sites. A habitat regulations assessment will be undertaken for this plan to assess the impact of the policies on SPAs.
418	DM295	Sport England	Ancillary	The wording of this policy may be unduly restrictive and may result in	Agreed. The policy will be revised to omit the term small

			activities	<p>essential supporting ancillary provision being refused planning permission. How does one define "small scale". Para 81 of the NPPF affords suitable protection to Greenbelt (including MOL) which allows greater flexibility than Policy DM26, C. Is states:</p> <p><i>Once Green Belts have been defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.</i></p> <p>Sport England would like to see this part of the policy altered to reflect a more positive approach.</p>	<p>scale, however recognising the key requirement remains for proposals to be ancillary to the use of open space and of an appropriate scale.</p> <p><b>Action: Remove term 'small scale' from policy wording.</b></p>
418	DM296	Sport England	Open space assessment	<p>Whilst Sport England is supportive of the protection afforded open space, the onus is placed upon the local planning authority to plan positively and undertake an assessment of open space and sporting need, such that this policy can be further strengthened to read:</p> <p><i>Planning permission resulting in the loss of open space will not be granted unless:</i></p> <p>a) <i>The loss results from a development allocation in a development plan</i></p> <p>In order to achieve the above strengthened wording, the Council will need to have undertaken a full open space strategy and Playing Pitch Strategy, in accordance with Sport England's Methodology, a copy of which can be found at <a href="https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/">https://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/</a></p> <p>It is understood that Haringey is undertaking this work and Sport England has been liaising with Andrea Keeble Sport and Physical Activity Commissioning Manager on this. This work should be allowed to be concluded and the outcomes fed into Policy, making it more robust, linking to the evidence base that sits behind it. There is little merit in undertaking an evidence base, if policy is not tailored to reflects its findings.</p>	<p>Noted. The Council considers the proposed policy is consistent with the NPPF. The Playing Pitch Strategy will be used as baseline evidence to inform the Council's Infrastructure Delivery Plan.</p>
418	DM297	Sport England	Playing fields	<p>It is understood that Haringey is undertaking a Playing Pitch Strategy and Sport England has been liaising with Andrea Keeble, Sport and Physical Activity Commissioning Manager on this. This work should be allowed to be concluded and the outcomes fed into Policy, making it more robust, linking to the evidence base that sits behind it. There is little merit in undertaking an evidence base, if policy is not tailored to reflects its findings. The use or arbitrary standards may be suitable for other typologies of open space, but should not be used for the provision of playing field land. Sport England would advocate that the Council identifies those housing allocation which are intended to provide playing field provision on site in kind and those where a financial contribution will be sought. The Policy needs to tailored depending on whether Haringey is or intends to adopt CIL or whether scaled back S106 contributions will be sought.</p>	<p>Noted. The Council considers the proposed policy is consistent with the NPPF. The Playing Pitch Strategy will be used as baseline evidence to inform the Council's Infrastructure Delivery Plan.</p>

418	DM298	Sport England	Playing fields	Sport England supports the approach that neighbouring or adjacent development should not prejudice playing field. This is particularly relevant in the case of housing being located too close to cricket outfield boundaries.	The Council welcomes support of this policy.
418	DM299	Sport England	Playing fields	Sport England supports the recognition given in these paragraphs to the importance of open space and playing field land.	The Council welcomes support of this policy.
529	DM300	MBA Planning on behalf of Ormved International Ltd, owner of Southwood Nursery site, Highgate Bowl	London Plan	<p>The policy must also align with the <b>London Plan 2015</b>. Two policies are relevant: <b>Policy 2.18 Green Infrastructure: the Multi Functional Network of Green and Open Space</b>; and <b>Policy 7.18 Protecting Open Space and Addressing Deficiency</b>.</p> <p>The element of <b>Policy 2.18</b> relevant to this objection is: <i>F Boroughs should: a set out a strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure by producing green infrastructure strategies that cover all forms of green and open space and the interrelationship between these spaces. These should identify <b>priorities for addressing deficiencies</b> and should set out positive measures for the design and management of all forms of green and open space.</i></p> <p>The relevant element of <b>Policy 7.18</b> is:</p> <p><i>B The loss of <b>protected open spaces</b> must be resisted unless equivalent or better quality provision is made within the local catchment area. Replacement of one type of open space with another is unacceptable unless an up to date needs assessment shows that this would be appropriate. LDF preparation</i></p> <p><i>C When assessing local open space needs LDFs should:</i></p> <p><i>a include appropriate designations and policies for the protection open space <b>to address deficiencies</b></i></p> <p><i>b <b>identify areas of open space deficiency</b>, using the open space categorisation set out in Table 7.2 as a benchmark for all the different types of open space identified therein</i></p> <p><i>c ensure that future publically accessible open space needs are planned for in <b>areas with the potential for substantial change</b> such as opportunity areas, regeneration areas, intensification areas and other local areas.</i></p> <p><i>d ensure that open space needs are planned in accordance with green infrastructure strategies to deliver multiple benefits.</i></p>	The Strategic Policies Local Plan sets out the strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure, including open space. The DM Policies help give effect to the Strategic Policies. The Council considers that the proposed policy is in general conformity with the London Plan and consistent with the NPPF.
529	DM301	MBA Planning on behalf of Ormved International Ltd, owner of Southwood Nursery site, Highgate Bowl	Overly restrictive	<p>Objects to criterion A of the policy: <i>'the Council will not grant planning permission for development that would result in the loss of open space unless an assessment has been undertaken which shows that the open space is surplus to all functions that an open space can perform'</i></p> <p>When read in conjunction with the Local Plan glossary of Open Space, and in particular reference to "predominantly undeveloped" is overly restrictive, and not in compliance with NPPF.</p> <p>Its inclusion of the word 'predominantly' means that it can be read as applying to relatively open previously developed sites. NPPF Glossary defines previously developed land as: Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface</p>	The Strategic Policies Local Plan sets out the strategic approach to planning positively for the creation, protection, enhancement and management of networks of green infrastructure, including open space. The DM Policies help give effect to the Strategic Policies. The Council considers that the proposed policy is in general conformity with the London Plan and consistent with the NPPF.



				infrastructure. This 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; and 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.	
529	DM302	MBA Planning on behalf of Ormved International Ltd, owner of Southwood Nursery site, Highgate Bowl	Recommended change to policy	<p>To properly align Criterion A with national and strategic policy it should be replaced by:</p> <p><i>The Council will grant planning permission for development that would result in the loss of open space if the site;</i></p> <ul style="list-style-type: none"> <li><i>a. is previously developed land (it should not be assumed that the whole of the curtilage can be developed); or</i></li> <li><i>b. is not in an area identified by the Council as deficient in open space and will not lead to the area becoming deficient; or</i></li> <li><i>c. is not protected open space; or</i></li> <li><i>d. an assessment has been undertaken which shows that it is surplus to all functions that an open space can perform.</i></li> </ul>	The Council considers that the proposed policy is in general conformity with the London Plan and consistent with the NPPF.
579	DM303	Laura Harrison, resident	Open space sales	I am also particularly concerned by attempts to sell publically owned green spaces for development. Whilst redevelopment of brownfield sites is acceptable to provide new housing, if density is to be increased, defending existing green spaces and also providing new ones should be an important priority in planning policy.	The DM Policies do not provide that the Council intends to sell green space for development. Strategic Policy SP13 sets out that the Council will resist development that results in a net loss of open space. The DM Policies will give effect to this strategic policy.
584	DM304	Rapleys on behalf of Lasalle Investment Management, long leaseholders	CIL complement	Criterion B requires all residential developments in Areas of Open Space Deficiency and in wards which fall below the Borough-wide target of open space to provide new open space and/or make financial contributions to enable the provision of new open spaces or improvements to the accessibility and quality of existing open space. In this regard, it should be noted that the Government advises that the Community Infrastructure Levy should be the principal means of funding infrastructure. As such, contributions should only be sought relative to site specific mitigation and infrastructure requirements directly arising from the development. Therefore, Criterion B should be amended to make it in line with national policy and guidance	<p>Haringey's Planning Obligations Supplementary Planning Document sets out the types of contributions the Council will seek through by S106 agreements. Haringey's CIL Charging Schedule sets out strategic infrastructure to be CIL funded. On site public, communal, amenity and private open spaces will be required on new development sites in line with standards set out in the Mayor's Housing Design Guide SPG.</p> <p><b>Action: Amend DM26 to appropriately reflect requirements for planning contributions.</b></p>
624	DM305	Tottenham & Wood Green Friends of the Earth	Support Policy	Support the policy	The Council welcomes support of this policy.
648	DM306	Jennifer Williams, local resident	Loss of green space	<p>Apart from the 'Greenway' I cannot find any definite plans for new green spaces laid down, but do find evidence of some that I know being removed, namely Tottenham Leisure Centre Car Park, the wooded area behind Reynardson Court and the green strip behind the wall in between Monument Way and Fairbanks Road</p> <p>It is my experience that the local green spaces on the estates allow a refreshing touch of the natural world to everyday London life. It really</p>	Open space is protected from inappropriate development by Strategic Policy SP13. There are challenges to increasing the amount of open space in Haringey given its built up urban character, and therefore the Local Plan includes requirements to ensure new developments protect existing open spaces whilst also improving their quality and function, as well as enhancing access to them.

				<p>helps me to feel better hear, from my house, birds singing, and a mature tree and a perhaps little bit of grassed area with a flowering shrub or tree.</p> <p>I am not sure that high density housing will allow for this kind of 'on your doorstep' natural therapy to continue.</p>	
657	DM307	Canal & River Trust	Moorings	<p>The Trust considers policy DM26 part C to be unsound as it would preclude the installation of small serviced mooring bollards/posts along the River Lee Navigation. Serviced mooring posts allow a boat to connect to services such as water and electricity. These posts are typically less than a metre in height with a width and depth of 20cm and thus have a negligible impact in terms of the open character of the waterway. The Trust is concerned that the strictness of this policy would preclude the installation of these service posts in conjunction with an approved residential mooring scheme.</p> <p>The Trust considers that the policy could be made sound by indicating that small structures associated with the provision of moorings along the River Lee Navigation will be considered acceptable provided that they do not harm the open character of the waterway.</p>	The Lee Valley Regional Park Authority's Park Plan sets out proposals for future use and development within the park, which Haringey's Local Plan seeks to support. The proposed policy provides for appropriate ancillary uses on open space, which includes the Blue Ribbon network.
659	DM308	Haringey Federation of Residents Associations (HFRA)	Protection	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?	Open space is protected from inappropriate development by Strategic Policy SP13. The DM Policies give effect to the Strategic Policies. Community Infrastructure Levy (CIL) funding will be made available from new qualifying development, which can support provision of strategic infrastructure including green infrastructure. Planning contributions will be sought to manage site specific requirements arising from development, including for open space.
698	DM309	Savills on behalf of the London Diocesan Fund	Enhance existing facilities	Further, nowhere in draft Policy DM26 is there mention of any consideration given to the enhancement of existing community facilities linked to development on open space areas where the latter contributes to improvements of leisure and community related facilities overall which is an important consideration. Draft policy should acknowledge these types of proposals also.	The policy includes scope for all development on open space, including where this is associated with existing facilities. It is not considered necessary to make this distinction within the policy. The principles for protecting and enhancing the quality and use of open space are set out in the Strategic Policies Local Plan.
698	DM310	Savills on behalf of the London Diocesan Fund	Open space assessment	It is considered that draft Policy DM26 is too restrictive in requiring open space assessments (in support of planning applications) to justify the loss of undesignated open space due to the fact that 1) designated open space areas where LBH have undertaken an open space assessment and concluded they are areas of open space value would remain protected, and 2) undesignated open space with no public access is likely to be of limited open space value and would have been discounted by LBH in previous assessment. The impact of the current wording could therefore unnecessarily delay or prevent development proposals from coming forward.	National Planning Policy Framework paragraph 74 requires that existing open space should not be built on unless an assessment has been undertaken which has clearly shown the open space is surplus to requirements. This policy does not state that the assessment must be undertaken by the applicant. In situations where a council assessment has been undertaken and deemed the land surplus to requirements this would be considered sufficient.
698	DM311	Savills on behalf of the London Diocesan Fund	Open space strategy	It does not appear that LBH have undertaken any updated open space strategy (since November 2005) to support the currently drafted policy DM26 and therefore it is not in compliance with NPPF (73) requirements	The Council completed the updated Open Space and Biodiversity Study in 2014. Council therefore considers that DM26 is in compliance with paragraph 73 of the National Planning Policy Framework.
727	DM312	Friends of Queen's Wood - David Warren	Green Space; conservation	The area is clearly marked on the Local Plan map as not only a SINC of Metropolitan Importance, but also Metropolitan Open Land. Queens Wood is also listed as a Historic Park and a Local Nature Reserve. Reference made to section SP6: 6.3.3 & 6.3.11 & DM25 &	The Strategic Policies Local Plan provides for the protection of Queen's Wood appropriate to its designations. The DM Policies provide further details in this regard. The Council does not consider that the Site

				DM26 which they believe conflicts with SA46	Allocations requirements are in conflict with the Strategic Policies and proposed DM Policies. The allocation makes clear the relevant designations for consideration in future development proposals.
742	DM313	Friends of Alexandra Park – Gordon Hutchinson	Quality of open space	In maintaining and improving the existing open spaces in the borough, we believe that it is vitally important to consider the quality of the experience which the open space offers.	Noted. The Local Plan includes requirements to ensure new developments protect existing open spaces whilst also improving their quality and function, as well as enhancing access to them.

**Comments on DM27 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
571	DM314	Matthew Bradby, Chair, Tottenham Civic Society	Access	The ambition to improve access from Wood Green to Alexandra Palace Park is noted. In our view this should be balanced with an ambition to improve access from Wood Green to Lordship Recreation Ground also, as this is only a few hundred metres from the edge of Wood Green, and offers at least as many recreational opportunities.	The Council is proposing a quietway from Wood Green to Tottenham Hale by way of Lordship Recreation Ground and Downhills Park which will help facilitate access in this area. The quietways will encourage cycling and walking across the borough including between Wood Green and Lordship Recreation Ground. A definition of quietways will be included in the glossary to highlight the role they play in improving access and enhancing recreational opportunities.  <b>Action: Amend glossary to add a quietways definition</b>
418	DM315	Sport England	CIL	Sport England supports this spatial approach and the need to remedy areas of identified deficiency. Again, if Haringey have or are adopting CIL then it will need to think about how this is reflected in the wording of policy which states financial contributions will be sought.	Noted. Details on contributions towards open space and green infrastructure are set out in the Council's Planning Obligations Guidance Supplementary Planning Document and CIL Charging schedule. A new overarching policy on the use of planning obligations will be created to avoid unnecessary repetition of requirements across the plan policies.  <b>Action: New overarching policy on the use of planning obligations.</b>
584	DM316	Rapleys on behalf of Lasalle Investment Management, long leaseholders	CIL	Criterion B seeks contributions towards the provision or improvement to pedestrian and cycle linkages between sites within the Green Grid and other open spaces. This requirement is not an on-site requirement. Developers should not be required to contribute to offsite pedestrian and cycle linkages, particularly development schemes facilitate a route through the site (by incorporating a route within the development scheme). This is a significant issue, as cumulative obligations would undermine development viability. Furthermore, the Council's current Regulations 123 list includes improved Greenway cycle and pedestrian routes. Therefore, the enhancement of the existing borough-wide pedestrian and cycle linkages and future aspirations to provide a new pedestrian and cycle network in the Haringey Heartland and Wood Green (as referred to in the draft Site Allocation) should be included in the Regulations 123 to facilitate the delivery and necessary funding. Criterion B should therefore be amended.	Details on contributions towards open space and green infrastructure are set out in the Council's Planning Obligations Guidance Supplementary Planning Document and CIL Charging schedule. A new overarching policy on the use of planning obligations will be created to avoid unnecessary repetition of requirements across the plan policies. The Council's planning obligations SPD sets out that any off site highways works required to mitigate the impact of a development within the vicinity of the site will be secured under a section 106 obligation. Contributions to pedestrian and cycling linkages could be required in this regard.  <b>Action: New overarching policy on the use of planning obligations.</b>
413	DM317	Natural England	Green Infrastructure	Haringey is within an area that Natural England considers could benefit from enhanced green infrastructure (GI) provision. As such,	The Council's approach to supporting the development of green infrastructure is set out in the Strategic Policies



				Natural England would encourage the incorporation of GI into developments in this area. GI can be designed to maximise the benefits needed for this area, for example it can be used to promote opportunities for recreation, improve links between communities and enhance flood-water management to protect surrounding homes and businesses. It can also be used to improve connectivity to other green spaces and to improve conservation and biodiversity.	Local Plan. The DM Policies help give effect to these policies.
413	DM318	Natural England	Map	We agree with your proposition at page 47 that Haringey's network of open spaces should be protected and enhanced wherever possible. We would however point out that we could not read the map or index of the Green Grid properly, as it was not clearly reproduced.	The Council recognises some maps are of a low quality and these will be amended in the final versions of the document to ensure they are clear and easy to read.  <b>Action: Amend green grid map to improve image quality.</b>
571	DM319	Matthew Bradby, Chair, Tottenham Civic Society	Open space loss	The 'green grid' approach would appear to be a good idea, if it acts to connect the green spaces across the borough with improved landscaping, traffic calming, footpaths and cycle ways. Green grid approach should not be used as a pretext for any loss of open green space, for example parts of Lordship Recreation Ground.	The Mayor's All London Green Grid Supplementary Planning Guidance sets out how the green grid should be implemented across London. It provides for the improvement of existing parks and greater connections between them. Open space is protected from inappropriate development by Strategic Policy SP13. The DM Policies give effect to the Strategic Policies.
413	DM320	Natural England	Special protection areas	We support the Green Grid approach to open space access outlined in this Draft DPD. However, as regards "the opening up of access to the Lee Valley Regional Park" (page 11), we would emphasise that parts of the Park are Special Protection Areas (SPAs) and as such are strictly protected sites under European legislation, classified for rare and vulnerable birds and for regularly occurring migratory species. The following link on our website provides access to details of individual Sites of Special Scientific Interest (SSSIs) - <a href="http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm">http://www.sssi.naturalengland.org.uk/Special/sssi/search.cfm</a> . The impacts of such green connections and links on the protected areas of the Park should be taken into account when considering such proposals.	Council welcomes the comments regarding the impact of access on Special Protection Areas within Lee Valley Regional Park. Council will work with Natural England and Lee Valley Regional Park Authority to ensure any proposals for access improvements will take into account these protected sites. A Habitats Regulations Assessment will be prepared alongside the plan to assess potential impacts.
624	DM321	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.
341	DM322	Jennie Pedley	Transport	The improved links between green areas for cyclists are very welcome.	The Council welcomes support of this policy.

## Comments on DM28 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	DM323	GLA	Allowable Solutions	It is suggested that the council consider alternative wording for the title of Policy DM28 (Allowable Solutions), for example 'Carbon offset fund', to avoid confusion with the government's national policy on allowable solutions. Under the currently proposed allowable solutions framework, developers will have free choice as to how they fulfil their allowable solutions requirements. Hence, the borough could encourage them to invest in local allowable solutions measures, but could not set policies requiring this.	Noted. This policy will be deleted to reflect changes to government policy.  <b>Action: Delete allowable solutions policy, but retain Council's intention to seek carbon offsetting where this is permitted by higher level policy.</b>

608	DM324	Home Builders Federation	NPPF compliance	<p>The local policy for allowable solutions does not conform to national policy. National policy as set out in the report entitled <i>Next Steps to Zero Carbon Homes – Allowable Solutions</i> (DCLG, July 2014) allows house builders four routes to achieve allowable solutions. It clarifies that these routes are not mutually exclusive and a house builder may want to mix and match, depending on their circumstances. The four routes set out in paragraph 8 are (and we quote):</p> <p><i>“i) the house builder could do more or all carbon abatement on site or through connected measures (e.g. a heat network);</i></p> <p><i>ii) the house builder could meet the remaining carbon abatement requirements themselves through their own off-site carbon abatement action (e.g. retrofitting existing buildings);</i></p> <p><i>iii) the house builder could contract with a third party to deliver the carbon abatement measures sufficient to meet the house builder’s zero carbon obligation;</i></p> <p><i>iv) the house builder could make a payment into a fund which then invests in carbon abatement projects sufficient to meet the house builder’s zero carbon obligation.”</i></p> <p>The report goes on to state in paragraph 11 that “ultimately it will be the house builders (sic) choice as to which route he chooses”.</p>	<p>Noted. This policy will be deleted to reflect changes to government policy.</p> <p><b>Action: Delete allowable solutions policy, but retain Council’s intention to seek carbon offsetting where this is permitted by higher level policy.</b></p>
624	DM325	Tottenham & Wood Green Friends of the Earth	Energy efficiency	<p>But we would like to see the minimum level of energy efficiency increased, and include at least some Passivhaus standards.</p>	<p>Noted. This policy will be deleted to reflect changes to government policy. Requirements for energy efficiency will be set in a revised policy on Sustainable Design, Layout and Construction.</p> <p><b>Action: Delete allowable solutions policy. Requirements for energy efficiency to be set in a revised policy on Sustainable Design, Layout and Construction.</b></p>
629	DM326	DP9 on behalf of undisclosed	Viability	<p>Requirement to provide financial contributions through a s106 in lieu of achieving the required on-site carbon reductions targets should be subject to a viability test, as affordable housing is in DM19.</p>	<p>Noted. This policy will be deleted to reflect changes to government policy.</p> <p><b>Action: Delete allowable solutions policy, but retain Council’s intention to seek carbon offsetting where this is permitted by higher level policy.</b></p>

## Comments on DM29 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
624	DM327	Tottenham & Wood Green Friends of the	Support Policy	N/A	The Council welcomes support of this policy.

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## Comments on DM30 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	DM328	GLA	Decentralised Energy	It is suggested that paragraph 4.39 be amended to include the following underlined text: '...Feasibility assessments should be prepared <u>on a whole life cost basis</u> , in line with the Mayor's relevant guidance...'. It should be noted that the 2014 Energy Planning Guidance is due to updated shortly.	The Council welcomes the suggested policy amendment and reference to updated guidance, which will be incorporated into the supporting text.  <b>Action: Update supporting text to reflect comment</b>
414	DM329	GLA	Decentralised Energy	It is also suggested that paragraph 4.40 be amended to include the following underlined text: '...For planned future networks, a short term 'grace period' of five years may be permitted in which the development would be exempt from providing on- site renewable energy <u>or CHP</u> , along with a potential relaxation of relevant requirements...' And that the final sentence is replaced with the following underlined text: <u>Should the planned future DE network not come forward, applicants will be expected to implement an alternative energy strategy to meet the target in place at the time of planning approval.</u>	The Council welcomes the suggested policy amendment which will be incorporated into the supporting text.  <b>Action: Update supporting text to reflect comment</b>
525	DM330	Barton Willmore on behalf of Workspace	Flexibility	At present the policy is not sufficiently flexible to ensure that development comes forward in a timely and viable manner	The Council considers that the policy is sufficiently flexible to enable development to come forward. In line with NPPF paragraph 96, it sets out that applications will be considered having regard to technical feasibility and financial viability. Policy DM30.C will be revised to provide further flexibility, however continuing to reflect findings of the Council's technical evidence - e.g. Council will expect proposals to secure connection rather than require, having regard to technical feasibility and financial viability.  <b>Action: Revise DM30.C to provide more flexibility</b>
608	DM331	Home Builders Federation	Too prescriptive	This policy is not in conformity with national policy. It is far too prescriptive. The Government has set out in its consultation report entitled <i>Next Steps to Zero Carbon Homes – Allowable Solutions</i> (DCLG, July 2014) that applicants will be able to choose which route they take to meet the allowable solutions element of the energy efficiency (Part L) targets of the Building Regulations. The Council cannot require applicants to justify which route they choose to take.  The Council cannot require that all major development located near a DE network must be designed to connect to the DE network.	Since the publication of the Regulation 18 stage document, the Government has announced that it does not intend to proceed with the allowable solutions framework. The Council considers that the proposed policy is in line with adopted London Plan Policy 5.6 (Decentralised Energy in Development Proposals) which sets out that proposals should be designed to connect to networks where opportunities are identified. The DM Policy adds further local specificity in this regard. Policy DM30.C will be revised to provide further flexibility, however continuing to reflect findings of the Council's technical evidence - e.g. Council will expect proposals to secure connection rather than require, having regard to technical feasibility and financial viability.  <b>Action: Revise DM30.C to provide more flexibility</b>

624	DM332	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.
694	DM333	Iceniprojects on behalf of Berkeley Homes	NPPF consistency	This draft policy is unsound as it is not fully consistent with national policy, in particular Paragraph 96, which requires planning application to <i>'comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it is can demonstrated by the applicant, having regard to the type of development involved its design, that it is not feasible or viable'</i> . References are made at points through the policy to viability and feasibility, which is supported; however this is not applied consistently and the draft policy should be updated to reflect this	The Council considers that the policy is sufficiently flexible to enable development to come forward. In line with NPPF paragraph 96, it sets out that applications will be assessed having regard to technical feasibility and financial viability. However, the policy will be revised in order to clarify this.  <b>Action: Revise policy and supporting text clarify considerations for technical feasibility and financial viability.</b>

**Comments on DM31 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
414	DM334	GLA	Overheating & Cooling	Although it is recognised that Policy DM31 is focused on local application of the London Plan Policy 5.9, consideration should be given to broadening the policy to apply to major development as well as minor development in terms of the council's requirements. The council should also not that the Chartered Institution of Building Services Engineers guidance referred to in paragraph 4.52 (TM49 Design Summer Years for London) is now available and it is recommend that developers use this London specific weather data when modelling overheating risk. The council may also wish to change the reference to the Code for Sustainable Homes in 4.53 as this is due to be wound down, for example it may wish applicants to provide the relevant Building Regulations Part L data to demonstrate the overheating risk for a development.	The Council welcomes information which will ensure the supporting text appropriately refers relevant guidance and technical standards. As noted, London Plan policy 5.9 will apply to major development and it is not considered necessary to duplicate this policy in the Local Plan.  <b>Action: Amend policy and supporting text to reference guidance and building regulations data.</b>
624	DM335	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.

**Comments on DM32 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
624	DM336	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.
413	DM337	Natural	Green Roofs	We are pleased to see reference to the provision of green and brown roofs and green walls where possible in developments at page 56.	The Council welcomes support of this policy. The supporting text refers to the Mayor's Sustainable Design

		England		One way of providing enhanced green infrastructure and biodiversity in an urban environment can be through the provision of green roofs. Natural England is supportive of the inclusion of green roofs in all appropriate development. Research indicates that the benefits of green roofs include reducing run-off and thereby the risk of surface water flooding, reducing the requirement for heating and air-conditioning and providing habitat for wildlife. Natural England would encourage you to consider the use of bespoke solutions based on the needs of the wildlife specific to the site and adjacent area. I would refer you to <a href="http://livingroofs.org/">http://livingroofs.org/</a> for a range of innovative solutions and <a href="http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf">http://www.london.gov.uk/sites/default/files/uploads/living-roofs.pdf</a> (London GLA 2008) regarding the fit with the London Plan policy.	and Construction SPG, which signposts further information and technical standards on green roofs.
422	DM338	Environment Agency	Green Roofs	We are supportive of this policy and in particular the reference to the GRO Green Roof Code (2014). We agree with paragraph 23.15.5 of the Sustainability Appraisal and suggest the policy also highlight the benefits in terms of improving water quality.	The Council welcomes support of this policy.  <b>Action: Amend supporting text to highlight benefits in terms of improving water quality.</b>

**Comments on DM33 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
589	DM339	Anonymous	Conservation	Don't demolish period buildings	Requirements pertaining to the demolition of heritage assets are covered by the DM Policy on managing the historic environment.
592	DM340	John Crompton, Chair, Muswell Hill CAAC	Windows	F it needs to be amended so that it states that this applies to all the windows and not just those visible from the public domain.	Noted. Considerations for the sustainable retrofitting of heritage assets and their setting are set out in the DM Policy on managing the historic environment.
592	DM341	John Crompton, Chair, Muswell Hill CAAC	Windows	@ Para 4.72 We suggest there needs to be specific reference to old glass which has a decorative pattern which may be a characteristic feature in a CA.	Noted. Considerations for the sustainable retrofitting of heritage assets and their setting are set out in the DM Policy on managing the historic environment.

**Comments on DM34 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
408	DM342	Mario Petrou	Air quality monitoring	A reference must be made to the aspiration to greatly increase the number and types of air quality meters, in particular to digital displays in problematic areas.	Air quality monitoring is carried out to ensure compliance with the Government's air quality objectives. The number and types of equipment used for air quality monitoring are outside the scope of the Local Plan.
408	DM343	Mario Petrou	Noise and vibration	A reference for the need of the noise team to be very significantly resourced needs to be added. Neighbour noise can harm the health of adjacent and contiguous occupiers.	Concern with neighbour noise is noted. Impact on amenity is considered to be sufficiently addressed by the environmental protection policy in addition to DM1 and DM2. Council staff resourcing is outside the scope of the Local Plan.
422	DM344	Environment Agency	Air Quality	We have a strategic duty for air quality and we do not have a statutory duty to comment on a site by site basis. However we do advocate measures such as enclosure (use of a building) for waste sites to	The Environment Agency's strategic duty in respect of air quality is noted. The proposed DM policy on new waste facilities is considered to sufficiently cover considerations



				control particulate emissions, which you may wish to consider when seeking air quality assessments. We will also be seeking the requirement for enclosure in the consultation on the North London Waste Plan.	for air quality on proposals where relevant. Further detailed requirements will be set out in the North London Waste Plan.
422	DM345	Environment Agency	Lighting pollution	We are pleased to see the requirements for mitigation of adverse impacts resulting from external lighting and encourage the inclusion of watercourses as a sensitive receptor. Artificial lighting disrupts the natural diurnal rhythms of a range of wildlife using and inhabiting the river and its corridor habitat. Minimising light spill to the river and within 8 metres of the top of the bank will reduce this disruption.	The Council welcomes support of this policy.
422	DM346	Environment Agency	Contaminated Land	We support parts F and G of the policy. The supporting text in paragraph 4.90 would benefit from a slight alteration to make it clear that the Environment Agency's responsibilities in terms of land contamination are in respect of controlled waters.	The Council welcomes support of this policy.  <b>Action: Amend supporting text to make clear that Environment Agency's responsibilities in terms of land contamination are in respect of controlled waters.</b>
592	DM347	John Crompton, Chair, Muswell Hill CAAC	Light pollution	@ Point E Need another bullet point about it only being on when necessary –e.g. a time switch or sensor is to be used in order to reduce light pollution etc.	Noted. The suggested policy criterion is considered to be sufficiently covered by the proposed policy and guidance signposted.
624	DM348	Tottenham & Wood Green Friends of the Action Earth	Support Policy	N/A	The Council welcomes support of this policy.
659	DM349	Haringey Federation of Residents Associations (HFRA)	Environmentally friendly development	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 eg 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.	Haringey's Local Plan includes a suite of policies addressing environmental sustainability as well as climate change adaptation and mitigation. Proposals for new development will only be granted permission where it is demonstrated that the policy requirements will be met. All Local Plan policies are subject to Sustainability Appraisal, which includes considerations for environmental sustainability.

**Comments on DM35 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	DM350	Environment Agency	Flood Risk	We are pleased to see that many of our previous comments have been taken on board. We have commented on these policies under one heading as we recommend consolidating them to form one stronger and more concise policy. As the National Planning Policy Framework sets out when a Flood Risk Assessment will be required we do not consider policy DM36 is an essential policy to have in its own right.	Noted. The Council welcomes the Environment Agency's continued feedback and policy advice. The suggested revisions will assist with setting a more concise policy framework on flood risk management.  <b>Action: Consolidate policies DM 35 and DM36 as recommended.</b>
422	DM351	Environment Agency	Flood Risk	It is positive that the policy outlines the requirement for sites to carry out the sequential test and our preference would be to have this in the early part of the policy to reflect the fact that it is one of the first stages in site selection. This will also prevent applicants carrying out FRAs unnecessarily prior to determining whether the sequential test is passed.	The Council welcomes the support for this policy and suggested revisions for improving its interpretation.  <b>Action: Revise policy criteria ordering as recommended.</b>

422	DM352	Environment Agency	Flood Risk	We suggest you split DM35 part B into two parts focusing on fluvial and surface water flood risk requirements. We have suggested the wording below which also strengthens the requirements for developers to aim to provide adequate flood plain compensation on site in the first instance and only offsite if this cannot be achieved.	Noted. The Council welcomes the suggested policy wording.  <b>Action: Revise DM35 policy formatting and wording as recommended.</b>
422	DM353	Environment Agency	Flood Risk	Suggested wording for Policy DM35 and deletion of DM36: <i>A. The Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants, and do not increase the risk of flooding.</i> <i>B. All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test (where required), have been satisfied. Proposals must be informed by a site specific Flood Risk Assessment (FRA) taking account of all potential sources of flooding and should:</i> <i>a. demonstrate the application of a sequential approach for the development of individual sites, to ensure that the most vulnerable land uses are located in areas of the site that are at lowest risk of flooding;</i> <i>b. preserve overland flood and flow routes and ensure there is no net loss of flood storage. Adequate flood storage compensation should be provided on site or if this is not possible provided off site where circumstances allow;</i> <i>c. where appropriate set out the mitigation measures that will be incorporated on site to manage residual flood risk including</i> <i>i. Finished floor levels set no lower than 300mm above the 1 in 100 chance in any given year, including an allowance for climate change, flood level.</i> <i>ii. Ensure safe access and egress for future users of the development or an appropriate emergency evacuation plan.</i>  <i>d. further contribute to naturalising watercourses where opportunities arise, in line with Policy DM40 (Watercourses &amp; Flood Defences).</i> <i>C. All proposals for new development will be required to:</i> <i>a. Manage and reduce surface water run-off, in line with Policy DM37 (Sustainable Drainage Systems) and Policy DM38 Critical Drainage Areas);</i> <i>b. Manage water and waste water discharges, in line with Policy DM41 (Managing Drainage Connections and Waste Water).</i> <i>D. With the exception of water compatible and essential infrastructure, development in areas designated in the Haringey's SFRA as being within Flood Zone 3b will not be permitted.</i>	The Council welcomes the suggested policy wording which will be incorporated into the Local Plan.  <b>Action: Consolidate policies DM 36 and DM35 and revise policy wording as recommended.</b>
624	DM354	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.

## Comments on DM36 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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422	DM355	Environment Agency	Flood Risk	We are pleased to see that many of our previous comments have been taken on board. We have commented on these policies under one heading as we recommend consolidating them to form one stronger and more concise policy. As the National Planning Policy Framework sets out when a Flood Risk Assessment will be required we do not consider policy DM36 is an essential policy to have in its own right.	Noted.  <b>Action: Consolidate policies DM 35 and DM36 as recommended.</b>
422	DM356	Environment Agency	Flood Risk	It is positive that the policy outlines the requirement for sites to carry out the sequential test and our preference would be to have this in the early part of the policy to reflect the fact that it is one of the first stages in site selection. This will also prevent applicants carrying out FRAs unnecessarily prior to determining whether the sequential test is passed.	Noted.  <b>Action: Revise policy criteria ordering to set sequential test requirement in first part of policy.</b>
422	DM357	Environment Agency	Flood Risk	We suggest you split DM35 part B into two parts focusing on fluvial and surface water flood risk requirements. We have suggested the wording below which also strengthens the requirements for developers to aim to provide adequate flood plain compensation on site in the first instance and only offsite if this cannot be achieved.	Noted.  <b>Action: Revise DM35 policy formatting in line with suggested revisions and strengthen policy requirements on flood plain compensation.</b>
422	DM358	Environment Agency	Flood Risk	<p>Suggested wording for Policy DM35 and deletion of DM36:</p> <p><i>A. The Council will ensure that all proposals for new development avoid and reduce the risk of flooding to future occupants, and do not increase the risk of flooding.</i></p> <p><i>B. All proposals for new development within Flood Zone 2 and 3a will be required to provide sufficient evidence for the Council to assess whether the requirements of the Sequential Test and Exception Test (where required), have been satisfied. Proposals must be informed by a site specific Flood Risk Assessment (FRA) taking account of all potential sources of flooding and should:</i></p> <p><i>a. demonstrate the application of a sequential approach for the development of individual sites, to ensure that the most vulnerable land uses are located in areas of the site that are at lowest risk of flooding;</i></p> <p><i>b. preserve overland flood and flow routes and ensure there is no net loss of flood storage. Adequate flood storage compensation should be provided on site or if this is not possible provided off site where circumstances allow;</i></p> <p><i>c. where appropriate set out the mitigation measures that will be incorporated on site to manage residual flood risk including</i></p> <p><i>i. Finished floor levels set no lower than 300mm above the 1 in 100 chance in any given year, including an allowance for climate change, flood level.</i></p> <p><i>ii. Ensure safe access and egress for future users of the development or an appropriate emergency evacuation plan.</i></p> <p><i>d. further contribute to naturalising watercourses where opportunities arise, in line with Policy DM40 (Watercourses &amp; Flood Defences).</i></p> <p><i>C. All proposals for new development will be required to:</i></p> <p><i>a. Manage and reduce surface water run-off, in line with Policy DM37 (Sustainable Drainage Systems) and Policy DM38 Critical DrainageAreas);</i></p> <p><i>b. Manage water and waste water discharges, in line with Policy DM41 (Managing Drainage Connections and Waste Water).</i></p> <p><i>D. With the exception of water compatible and essential infrastructure,</i></p>	Noted.  <b>Action: Consolidate policies DM 36 and DM35 and revise policy wording in line with suggested revisions.</b>

				<i>development in areas designated in the Haringey's SFRA as being within Flood Zone 3b will not be permitted.</i>	
422	DM359	Environment Agency	Evidence Base / SFRA	We commented in August 2014 on your then adopted Level 2 SFRA (dated March 2013). The SFRA (dated Feb 2015) has now been updated following these comments but we note its status is now draft, rather than adopted. As this is an updated document we have concentrated on commenting on the recommendations for specific site allocations and how the SFRA supports the allocated sites. Your Level 1 SFRA and Surface Water Management Plan (SWMP) was not available on your website and we ask that they are added.	Strategic Flood Risk Assessment Level 1 and 2, Surface Water Management Plan and Thames River Basin Management Plan will be included on the Council's Local Plan evidence base webpage.  <b>Action: Add above noted documents to evidence base page.</b>
422	DM360	Environment Agency	Evidence Base / SFRA	Our comments on the SFRA should be read in conjunction with our comments on the Draft Site Allocations (DPD) and Draft Tottenham Area Action Plan to ensure that all documents are supported by the best possible information.	Noted.
422	DM361	Environment Agency	Evidence Base / SFRA	We have noticed that many of the sites' summary tables contain the wrong site outlines or different site names to the site allocations documents including the following sites: <ul style="list-style-type: none"> <li>• NT2, Northumberland Park</li> <li>• NT5, Tottenham Hotspur Stadium</li> <li>• SS2, Gourley Triangle</li> <li>• TH1, Station Square West</li> <li>• TH5, Tottenham Hale Retail Park</li> <li>• TH7, Hale Wharf</li> <li>• TH8, Welbourne Centre</li> <li>• SA52, Pinkham Way</li> <li>• SA26, Clarendon Square Gateway</li> </ul>	Noted. The Council will ensure the next published version of the document is appropriately formatted.  <b>Action: Amend document to ensure site summary tables correspond with relevant site allocations.</b>
422	DM362	Environment Agency	Evidence Base / SFRA	There are some allocated sites are not included in the SFRA. The SFRA should provide guidance on the preparation of Flood Risk Assessments for allocated development sites. This is particularly important where site allocations include or are bordered by a culverted Main River. This is because if the culvert fails these sites may be at increased flood risk even though they are in Flood Zone 1. This scenario is not covered by the main SFRA document (Section 9.1 Over-Arching Principles). In order to be satisfactory the SFRA's Appendix A should include the following sites: <ul style="list-style-type: none"> <li>• NT4, North of White Hart Lane</li> <li>• TH3, Ashley Road North and Hale Slither (area a)</li> <li>• TH6, Hale Village Tower</li> <li>• TH9, Fountayne and Markfield Road</li> <li>• TH10, Herbert Road and Constable Road</li> <li>• SA14, Mecca Bingo</li> <li>• SA17, The Mall</li> <li>• SA62, Barber Wilson</li> <li>• SA66, Leabank and Lemsford Close</li> </ul>	The SFRA will be updated to include these sites.  <b>Action: Update SFRA as suggested.</b>
422	DM363	Environment Agency	Evidence Base / SFRA	We are pleased to see that our previous comments have been considered and that a sequential test has now been carried out. It is positive that the majority of the sites are located in Flood Zone 1. There are some sites located in Flood Zone 2 and one site has some Flood Zone 3. We have some suggestions below to improve the robustness of the sequential test. Once the Sequential Test has been finalised it is imperative that it is available on your website and can be	Noted.  <b>Action: Add Sequential Test to evidence base page.</b>

				viewed alongside other evidence base documents.	
422	DM364	Environment Agency	Evidence Base / SFRA	We are pleased to see that all site allocations in Flood Zones 2 and 3 are included in the sequential test. It would be beneficial to provide clarity on the criteria which have been used in selecting all of the sites to be sequentially tested; for example sites in Flood Zone 1. We encourage you to sequentially test sites which are also identified as Critical Drainage Areas to provide further transparency.	All sites have been included for consideration within the sequential test.
422	DM365	Environment Agency	Evidence Base / SFRA	Site SA52 (Pinkham Way) has an area of Flood Zone 3 which, although is recognised in the site allocation, is not reflected in the sequential test. We recommend the sequential test is revisited to show that there is some Flood Zone 3 within the red line boundary.	Sequential test will be revisited to reflect that part of Site SA52 is located within Flood Zone 3. This will also be signposted in the development guidelines.  <b>Action: Revisit sequential test to reflect that part of SA52 falls within Flood Zone3. Amend development guidelines to signpost this.</b>
422	DM366	Environment Agency	Evidence Base / SFRA	We request that the wording in the final column (Sequential Test passed?) is altered for sites in Flood Zone 2 to simply state that a Flood Risk Assessment (FRA) will need to be submitted with a planning application. By stating that a <i>Surface</i> Water (FRA) is required implies that you only require consideration of the impacts of the development on surface water flood risk and not fluvial flood risk or other sources of flooding. This would be contrary to the National Planning Practice Guidance.	Wording in sequential test will be amended as suggested to ensure compliance with national planning policy and guidance.  <b>Action: Amend sequential test text as suggested.</b>
422	DM367	Environment Agency	Evidence Base / SFRA	At present the document is very difficult to cross reference with the Site Allocations and Area Action Plan documents as the site ID and names are different. Please ensure that the Site ID matches across all of the published documents.	Noted. The Council will ensure the next published version of the document is appropriately formatted.  <b>Action: Amend document to ensure site summary tables correspond with relevant site allocations.</b>
422	DM368	Environment Agency	Evidence Base / SFRA	The Sequential Test does not consider any of the allocated sites in Flood Zone 2 for highly vulnerable uses, which must be cross-referenced to the development guidelines for the site specific allocations.	Noted. For all relevant site allocations, the Development Guidelines will be updated to signpost where sites are located in Flood Zone 2 and state that highly vulnerable uses will not be permitted.  <b>Action: Amend Site Allocation development guidelines as above.</b>
422	DM369	Environment Agency	Evidence Base / SFRA	Although the Sequential test mentions windfall sites, it does not consider the approach of applying the sequential test to windfall sites. For clarity we suggest you refer to your Development Management Policy DM36 and supporting text 4.105 for the approach on considering windfall sites.	Council considers that policy requirements are covered by NPPF and London Plan.
422	DM370	Environment Agency	Flood Risk	We are also supportive of paragraphs 4.108 and 4.109 and are pleased to see reference made to the SFRA.	The Council welcomes support of this policy.
624	DM371	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.



Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	DM372	Environment Agency	SuDs	<p>We are supportive of this policy and the supporting text and have some minor suggestions to strengthen the wording.</p> <p>B. The Council will require Sustainable Drainage Systems (SuDS) to be sensitively incorporated into new development by way of site layout and design, having regard to the following requirements:</p> <p>a. All major development proposals will be required to reduce surface water flows to a greenfield <u>run-off</u> rate of <del>run-off</del> for a 1 in 100 year <u>critical</u> storm event;</p> <p>b. All minor development proposals should aim to achieve a Greenfield rate of run-off and, at a minimum, achieve a 50 per cent reduction on existing site run-off rates; and</p> <p>c. All other development should seek to achieve a greenfield rate of run-off and include at least one 'at source' SuDS measure resulting in a net improvement in water quantity or quality discharging to a sewer.</p> <p><u>d. For all development where a Greenfield run-off rate cannot be achieved justification must be provided to demonstrate that the rate has been reduced as much as possible.</u></p>	<p>The Council welcomes support of this policy and agrees with the suggested changes.</p> <p><b>Action: Amend policy as suggested.</b></p>
422	DM373	Environment Agency	SuDS	<p>C. In addition, where Sustainable Drainage Systems are implemented they will be expected to:</p> <p>a. Meet the requirements set out in the Council's guidance until such time National Standards are in place;</p> <p>b. Incorporate measures identified in the Surface Water Management Plan;</p> <p>c. Be designed to maximise biodiversity and local amenity benefits, and where appropriate, ensure that SuDS techniques provide for clean and safe water at the surface; and</p> <p>d. Function effectively over the lifespan of the development.</p> <p>e. Improve water quality</p>	<p>Council agrees with the change and has amended the policy to reflect this.</p> <p><b>Action: Amend policy to include a reference to water quality.</b></p>
422	DM374	Environment Agency	SuDS	<p>D. Where SuDS cannot be implemented due to site constraints (such as land contamination or space limitations), robust justification must be provided along with proposed alternative sustainable approaches to surface water management.</p>	<p>Council agrees with the change and has amended the policy to reflect this.</p> <p><b>Action: Amend policy as suggested.</b></p>
422	DM375	Environment Agency	SuDS	<p>Urban Diffuse Pollution is a key issue within this catchment to which the use of SuDS provides an opportunity to improve water quality. Any improvements will not only provide benefits in the immediate locality but will also further down the catchment. Developers should be encouraged to incorporate SuDS in any development, which is also supported by strategic policy SP5 of Haringey's Local Plan. SuDS can be used for both new development and retrofitting/refurbishment of existing stock.</p>	<p>Council welcomes support of this policy and agrees that SUDS provide an opportunity to improve water quality. Policy amended to reflect this.</p> <p><b>Action: Amend policy in line with other changes suggested to the policy.</b></p>
426	DM376	Thames Water	SuDS	<p>Thames Water supports the London Plan drainage hierarchy and Policy DM37 and welcomes the Mayor's emerging London Sustainable Drainage Action Plan. Urbanisation, climate change, population growth and modern lifestyles are putting sewers under increasing pressure. While the fabric of Thames Water's sewerage system is largely in good condition, many sewers now handle much larger volumes than they were designed to.</p>	<p>The Council welcomes support of this policy.</p>
608	DM377	Home Builders Federation	NPPG Compliance	<p>The policy may need to be amended to reflect the new national planning guidance. The PPG in paragraph ID 7-079 states:</p> <p>Whether a sustainable drainage system should be considered will</p>	<p>The guidance outlines that whether a sustainable drainage system should be considered will depend on the proposed development. It expands on major developments but does not state that only major development should provide</p>

				<p>depend on the proposed development and its location, for example whether there are concerns about flooding. Sustainable drainage systems may not be practicable for some forms of development (for example, mineral extraction). New development should only be considered appropriate in areas at risk of flooding if priority has been given to the use of sustainable drainage systems. Additionally, and more widely, when considering major development, sustainable drainage systems should be provided unless demonstrated to be inappropriate.</p> <p>This advises that only major development should provide SUDs. Therefore insisting that all schemes provide SUDs in all circumstances would not accord with the national practice guidance.</p>	SuDS. Council has set policy to provide further guidance on the type of SuDS which should be provided for both minor and major development proposals. Council considers this policy is in line with the updated national planning guidance.
624	DM378	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.

**Comments on DM38 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	DM379	Environment Agency	Drainage	We are supportive of this policy. We have not notified you of any Critical Drainage Areas and it is clear that the policy is referring to Critical Drainage Areas identified in your Surface Water Management Plan.	The Council welcomes support of this policy.

**Comments on DM39 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
624	DM380	Tottenham & Wood Green Friends of the Earth	Fracking	We welcome Policy DM39 Protecting and Improving Groundwater Quality and Quantity – but it should be amended to include policies to stop fracking, in line with the commitment given by the Cabinet member in the Full Council meeting in March 2014.	Support for policy on protecting and improving groundwater quality and quantity is welcomed. The NPPF along with published technical guidance set out policies and guidance relevant to minerals development. NPPF paragraph 144 requires that when determining planning applications, the Council should ensure there are no unacceptable adverse impacts on natural environment or human health. The Council does not propose to include further local policy requirements.
426	DM381	Thames Water	Groundwater	There are a large number of groundwater and surface water assets within the Borough and Thames Water therefore support Policy DM39 which aims to protect these.	The Council welcomes support of this policy.

**Comments on DM40 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	DM382	Environment Agency	Water Quality	We suggest part A is reworded to say ' <i>where the site boundary is within 8m of a main river or 5m of an ordinary watercourse new development will be required to....</i> '. This prevents the possibility of a red line boundary being drawn to exclude the watercourse to avoid fulfilling the requirements of the condition. It is positive that the River Basin Management Plan has been referred to in the policy and in the supporting text.	Noted. Agree with recommended revision to policy.  <b>Action: Amend policy as suggested.</b>
422	DM383	Environment Agency	Watercourse	We are supportive of the presumption against culverting in part B. We suggest a change in wording of part C to improve the robustness of its implementation " <i>On sites with culverted watercourses, proposals for new development will be expected to investigate and secure the implementation of measures to restore sections of the watercourse, with clear and robust justification provided if considered unachievable.</i> "	Support for policy is noted. Agree with recommended revision to policy DM40(C).  <b>Action: Amend supporting text to state that clear and robust justification will need to be provided if deculverting is not possible.</b>
422	DM384	Environment Agency	Watercourse	Part D is positively worded and we are pleased to see that a set-back distance of 8m and 5m has been specified, and a requirement for a condition survey of existing flood defences. For further clarity you may wish to note either in the policy or in the supporting text that culverts are also considered flood defences.	The Council welcomes support for this policy and suggestion to clarify that culverts are considered flood defences.  <b>Action: Amend supporting text to clarify that culverts are considered flood defences.</b>
422	DM385	Environment Agency	Watercourse	Providing a definition of main watercourses and ordinary watercourses in supporting paragraph 4.127 is helpful. As it is currently written it may be slightly misleading as there are examples such as the Havering New Sewer which are classified as main watercourses. We recommend the following alternative text to avoid any confusion: " <i>Main rivers are all watercourses shown on the statutory main river maps held by the Environment Agency and the Department of Environment, Food and Rural Affairs. Ordinary watercourses are all other watercourses.</i> "	Noted. The Council welcomes the clarification on terminology.  <b>Action: Amend supporting text to reflect comments and add definitions to glossary.</b>
422	DM386	Environment Agency	Watercourse	Whilst we are supportive of this policy and are satisfied that it covers flood risk adequately, we feel that the focus on improving watercourses in terms of ecology and WFD is somewhat hidden in supporting paragraphs 4.130 -4.133. You could either add to DM40 or have an additional policy to cover the Blue Ribbon Network in its own right, building on the requirements set out policy SP5 to restore and enhance the Blue Ribbon Network. The policy should make it clear to applicants how the Council will expect protection and enhancement of all watercourses, culverted or otherwise. For a good example where this has been achieved and implemented well we refer you to Harrow's Policy DM11	The Council welcomes support for this policy. This section of the DM document will be amended to set out further details and requirements in respect of water quality and ecology, particularly in view of the WFD.  <b>Action: Amend policy to set clearer expectations and requirements in respect of protection and enhancement of watercourses and water quality.</b>
624	DM387	Tottenham & Wood Green Friends of the Earth	Deculverting	We welcome Policy DM40 Watercourses and Flood Defences – but we want to see it fully incorporated into eg the TAAP where Moselle could be deculverted	Support for this policy is noted. The DM policies are borough-wide policies that will be applied to the AAP area. The Council does not consider it necessary to duplicate policies in the AAP where borough wide policies apply. The supporting text to the proposed policy DM40 sets out opportunities for deculverting within Tottenham and refers relevant guidance to assist with implementation.

## Comments on DM41 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
422	DM388	Environment Agency	Drainage	This policy would be a good place to have a requirement for developers to investigate and rectify any misconnections on site to improve water quality in the borough. The Lower Lee river system has historically suffered from poor water quality as a result of significant modifications. Many tributaries are confined to concrete open channels or in some cases hidden underground in culverts or pipes. This led to widespread pollution from sewage misconnections that went undetected.	The Council considers that the suggested requirement is addressed within the proposed policy with criterion DM41(A)(b). The additional reasoned justification is welcomed and this will be considered for inclusion in the plan.
426	DM389	Thames Water	Drainage, water supply	Thames Water support Policy DM41 in principle, but consider that it needs to be improved, particularly in relation to water supply. A key sustainability objective for the preparation of the DPD/Local Plan should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure, in accordance with Paragraphs 156 & 162 of the NPPF, its guidance and Policies 5.14 & 5.15 of the London Plan. Thames Water consider that the Local Plan should include a specific reference to the key issue of the provision of water supply and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water /sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). Such a policy is required to ensure the infrastructure is provided in time to service development to avoid unacceptable impacts on the environment such as sewage flooding of residential and commercial property, pollution of land and watercourses plus water shortages with associated low pressure water supply problems. It is also important that the satisfactory provision of water and sewerage infrastructure is covered to meet the test of "soundness" for Local Plans. Policy DM41 is generally very good in relation to waste water/sewerage, but there needs to be similar policy covering water supply.	The Council welcomes support for this policy. The policy will be amended to set clearer requirements for on-site management of waste water and water supply, including a new point requiring proposals to be designed to meet London Plan target for mains water consumption. It is noted that water supply and waste water infrastructure are included in the Council's Infrastructure Delivery Plan. This will be regularly updated to take account of Thames Water rolling programme of Asset Management Plans.  <b>Action: Add requirements for on-site management of waste water and water supply. Supporting text to set out that applicants must consult Thames Water where it has raised concerns regarding sewerage network capacity.</b>
426	DM390	Thames Water	Drainage	Parts B&C of Policy DM41 also require some clarification regarding the separation between foul and surface water along the lines of the following:  "B. The Council will give preference to mains <u>foul</u> drainage and will seek to restrict the use of non-mains drainage <u>for foul water disposal</u> , particularly in Source Protection Zones, in line with Environment Agency guidance.  <u>All proposals for new development must seek to manage surface water as close to its source as possible, in line with the London Plan drainage hierarchy.</u>  C. Where non-mains drainage is proposed <u>for the disposal of foul water</u> , a foul drainage assessment will be required to ensure the most sustainable drainage option will be implemented."	The Council welcomes the clarification regarding foul water and mains foul drainage and will amend policy taking account of suggested revisions. The reference to surface water management and the London Plan drainage hierarchy is considered to be sufficiently covered by other DM policies, including (Managing and Reducing Flood Risk) and (Sustainable Drainage Systems).  <b>Action: Amend policy to reflect comments regarding foul water disposal.</b>
624	DM391	Tottenham & Wood Green	Support Policy	N/A	The Council welcomes support of this policy.



		Friends of the Earth			
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**Comments on DM42 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
589	DM392	Anonymous Local resident	Transport	Improve accessibility, particularly for older people	The Strategic Policies Local Plan seeks to improve accessibility for all residents and visitors to the borough, including older people. The DM Policies give effect to the Strategic Policies.
592	DM393	John Crompton, Chair, Muswell Hill CAAC	Parking	@ Para 4.142 Does this take into account the real world: it is all very well saying you have restricted car parking provision but aren't people just going to have a car anyway?	The policies are intended to support sustainable transport modes as alternatives to private car use. Car free development will be supported in areas where there are high levels of public transport accessibility.
610	DM394	Turley on behalf of St. William	Additional flexibility	Policy DM 42 seeks to encourage sustainable transport through transit oriented developments and the provision of pedestrian and cycle facilities. Part A of the policy currently states that 'the Council will require that developments with high trip generating characteristics locate where public transport accessibility is high and car parking is minimised to mitigate generated car travel'. We consider that the phrase 'where feasible' should be added as site location is subject to numerous matters and may not benefit high public transport accessibility levels.	The Council considers it is preferable to locate high trip generating uses in areas of high public transport accessibility as this supports sustainable development by providing options to the private car. The Council will consider such developments in other areas depending on individual circumstances.
624	DM395	Tottenham & Wood Green Friends of the Earth	Parking	We welcome Policy DM42 Sustainable Transport and Policy DM43 Parking –but it needs to be strengthened to make car-free the norm (and associated CPZs)	The policy can only operate with effective controls on on-street parking and access to public transport as described in paragraph 4.149 (now 5.8). It is not considered appropriate to have a policy which cannot be effectively implemented.
659	DM396	Haringey Federation of Residents Associations (HFRA)	Our Tottenham Charter	IMPROVE THE STREET ENVIRONMENT Ensure safer, friendlier, traffic-calmed, 'living' streets with less clutter and more greenery - All planning policies must ensure that: Tottenham's air quality is as good as in the West of Haringey; Maximise the spread of 20mph zones, car-sharing schemes, on-street cycle lock-ups, and pedestrian and cycling connections/networks across the borough; Promote options for street improvements, including Streets In Bloom, DIY Streets, Home Zones, Play Streets, improvements to front gardens, more benches and community-run notice-boards; ensure High Streets are re-designed more for people and less for cars	Noted. The Council is pursuing sustainable transport policies and projects outside of the planning process. Our Local Implementation Plan (Transport Strategy) sets these out in detail. We will seek to implement projects and programmes to support the LIP through the planning process such as cycle facilities, traffic calming, car sharing schemes, walking improvements, support for electric vehicles and cycle parking.
660	DM397	Anonymous local resident	Traffic	The principal concern is that there will be a major increase in traffic pollution (hence ill health) and jams in the Green Lanes, Wightman Road, Endymion Rd area due to the residential developments proposed for Harringay Ward and surrounding areas including Wood Green and South Tottenham. Also that the transport suggestions do not begin to take account of this. The result will be an area that is	The Local Plan policies seek to mitigate the traffic impact of all developments, including housing, by supporting sustainable transport modes and alternatives, such as requiring car clubs, cycle parking, and supporting car free or low car parking developments.



				unpleasant due to air quality, unhealthy due to traffic fumes and dysfunctional due to traffic jams. It is already the case that some with respiratory conditions avoid Green Lanes and others are planning to move away from the area because of the proposed developments. We cannot allow the air to get any worse	
660	DM398	Anonymous local resident	Mode shift unlikely	Cross Rail 1 and 2, upgraded tube and overground rail services, footways, cycling etc offer no solution to many people : self-employed residents whose work involves transporting equipment, who must visit far distant destinations where they would have to walk a long way at the other end; the disabled, semi-disabled, the elderly and the very young (with two or three children and shopping); those who make deliveries of groceries and other heavy goods; service providers like plumbers etc; care assistants who visit the sick, disabled and elderly who are now cared for in their own homes rather than in care homes; the mobility-impaired who want to go out. For all these an individual vehicle must be used. Then there will be the family parties, funerals, weddings etc. All of these journeys will greatly increase traffic in this area if the developments go through	The Council considers car clubs can provide an effective means of providing access to cars for specific journeys without the need for people to own a car. We are seeking to minimise traffic impact of new developments by seeking the provision of car clubs, supporting car free or low car parking developments, seeking provision of cycle parking standards and locating large generators of traffic within areas of high public transport accessibility which can provide alternatives to owning a private car.
660	DM399	Anonymous local resident	Unsuitable cycle routes	When more cycling only routes are introduced into narrow roads – and all roads around Harringay Ward are narrow - then that makes worse traffic jams for vehicles. As air pollution worsens, asthmatics and those with COPD and cardiovascular disease are advised to stop cycling and walking	The Council has not introduced cycle only routes on local roads. Cyclists can share road space with other road users with designs allowing for all road users to move freely.

**Comments on DM43 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
265	DM400	NHS Property Services (Savills)	Support	These representations support the principle of providing less than the maximum car parking standards as set out by the London Plan and also support the aspiration to encourage contributions towards car club schemes in lieu of on-site car parking. Accordingly, no proposed amendments are suggested for this policy.	The Council welcomes support of this policy.
415	DM401	Transport for London	Parking	The principle of this policy to help to restrain car use is welcomed.	The Council welcomes support of this policy.
610	DM402	Turley on behalf of St. William	Additional flexibility	We generally agree with the Policy in principle as it supports the standards set out in the London Plan. However, we consider that an aspect of Saved UDP Policy M10 and Paragraph 4.152 of the DMP be integrated into DM 43 to include: 'For larger developments the parking requirement will be assessed on an individual basis as part of the Transport Assessment or Statement'. Whilst we acknowledge the sustainable approach to limiting car parking provision for new developments, we consider this to have significant impacts on development viability, particularly in Haringey. Car ownership outside zone 1 and 2 is common and this has been acknowledged in the recently adopted version of the London Plan and the provision for this should be incorporated in all developments. The provision of higher provision of car parking on site will aid and reduce on-street parking stress and any associated congestion problems caused as a result of this. For mixed use developments, it is important to consider the	The Council welcomes support in principle for this policy. Paragraph 4.152 provides guidance on the application of this policy and therefore is the most appropriate place for this statement. Car parking may be common outside zones 1 and 2 but this can vary greatly between boroughs. In Haringey in 2011 45% of households did not own a car. The construction of residential developments in areas with high levels of access to public transport will contribute to reducing parking stress and associated congestion problems as people are encouraged to use alternative forms of transport. All applications for planning permission are, and will continue to be, assessed on an individual basis to determine parking requirements.

				various trips this will stimulate and the car parking impacts this will have. Therefore, we support the need for the council to assess the parking requirements for large developments on an individual basis so as to provide developers with sufficient flexibility to respond to site specific demands and circumstances.	
613	DM403	Colin Marr, local resident	Garages	<p>There is pressure on car parking spaces throughout Haringey and off-street parking provision is scarce. In some instances garage courts and parking provision, often established as part of an earlier housing development, have been underused because of dilapidation or size constraints. Nevertheless, these sites are valuable to the community for parking and should not be used for other purposes.</p> <p>Recommendation:</p> <p>Insert Additional point D after existing point C – to read:</p> <p>D The Council will not support development on existing sites currently used for garaging or car parking. Where a group of garages exists in the form of a garage court or other grouping and is not within the curtilage of a building, and the garages and/ or the site on which they are built can continue to be used, with or without adaptation, for parking of cars, planning permission will not normally be granted for the change of use of the land.</p>	Garages are frequently used for storage and, as acknowledged by the respondent, are sometimes not of a size suitable for modern cars. Their loss therefore is not likely to make a notable difference to on-street parking pressure in Haringey.
624	DM404	Tottenham & Wood Green Friends of the Earth	Parking	We would add that, to be effective, areas containing car-free housing must be CPZs. Otherwise residents will find somewhere to park. This has happened on Ferry Lane Estate where residents of the supposedly car-free Shian housing development (and possibly from Hale Village where parking spaces are charged for) park on Jarrow Road, which is not a controlled parking street.	This policy provides for the provision of controlled parking zones prior to occupation of the development. This will help to ensure that neighbouring areas are not congested as a result of new development with limited or no onsite parking.
633	DM405	Anne Gray, Local Resident	Parking	There should be a presumption that land should not be used just for car parking; car parking should be underneath a commercial or residential building and all major car parks should be targeted as suitable for more intensive use of land, creating useful buildings with parking at ground or basement level.	Noted. The Local Plan policies seek to optimise the use of land having regard to the London Plan parking standards. Proposals for basement car parking provision could be supported subject to other policy requirements.
694	DM406	Iceniprojects on behalf of Berkeley Homes	Support	Support the assessment of parking for larger developments on a case-by-case basis. Research undertaken by WSP on behalf of Berkeley Group demonstrates that the provision of car parking does not necessarily lead to a proportionate increase in car ownership and trips.	Council welcomes support for the supporting text.

## Comments on DM44 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
415	DM407	Transport for London	Crossovers and Vehicular Accesses	TfL would suggest including new wording “Any proposals for crossovers on the Transport for London Road Network will require approval TfL as well as by the borough. Any proposals here should be in line with TfL’s Crossover Guidance.” This guidance is available here <a href="http://www.tfl.gov.uk/cdn/static/cms/documents/vehiclecrossovers-guidance-for-applicants.pdf">http://www.tfl.gov.uk/cdn/static/cms/documents/vehiclecrossovers-guidance-for-applicants.pdf</a> which, as well as other requirements and	<p>Agreed.</p> <p><b>Action: Amend supporting text to include suggested wording.</b></p>

				regulations, does not allow any entering or exiting of the TLRN other than in forward gear.	
571	DM408	Matthew Bradby, Chair, Tottenham Civic Society	Vehicle crossovers	There should be a strong ambition to reduce the damage to gardens and streetscapes caused by parking, in the number of crossovers that are granted and also the number of illegal parking spaces created in the east of the borough. We have seen the response of Muswell Hill and Fortis Green Association and agree with it.	Policies DM44 and Policy DM45 recognise the potential damage to gardens arising from vehicle accesses and front garden parking and these policies seek to minimise this. Management of illegal off street parking can be managed through the Highways Act.
593	DM409	John Crompton, local resident	Trees	Add two new bullet points about no loss of characteristic features such as front garden walls and also loss of trees –both street trees and trees subject to TPO within the garden itself.	The issue of impact on trees in general and street trees in particular are considered as part of planning applications. The loss of front garden walls can be considered as part of planning applications in Conservation Areas.
607	DM410	Muswell Hill & Fortis Green Association	Conservation	<p>The Association regards these policies as two aspects of the same issue. It is opposed to the creation of vehicular accesses and crossovers and the use of the whole or part of front gardens for parking purposes because :</p> <p>A. They degrade the built environment by:</p> <ul style="list-style-type: none"> <li>i. reducing the amount of planting on or near a highway causing loss of visual cohesion to the street scene,</li> <li>ii reducing the ameliorating affect of vegetation on pollution.</li> <li>iii. cause the loss of architectural harmony on a highway by removing either wholly or partially front garden walls and or hedges and</li> <li>iv. creating a visually " hard" intrusive element to a street scene.</li> </ul> <p>B. Reduce the amount of natural drainage and contribute to run-off</p> <p>C. Are a danger to pedestrians not only when a cross-over / vehicular access is in use but also when the parked vehicle overhangs the pavement.</p> <p>D. Are a danger to other road users particularly when vehicle accesses the highway by backing onto it.</p> <p>E. Reduce the amount of parking available in the public realm.</p> <p>Consequently the Association would wish policies DM43 and DM44 to be made one policy to read as follows:</p> <p>" The Council will not support any proposal for a new crossover or new vehicular access from a highway to an existing or proposed private dwelling and will not support any proposal for parking on front gardens.</p> <p>In the exceptional event of consent being granted for parking on a front garden it will be a condition that no less than 50% of the garden is soft landscaping and any hard standing should seek to improve drainage and reduce flooding of the public highway and/or adjacent</p>	Policies DM 44 and DM45 relate to different situations and seeking to address different issues hence separate policies have been included. DM44 primarily relates to highway impacts whilst DM45 is a design and environmental issue.

				<p>properties through the use of a permeable paving material.</p> <p>The Council will encourage the reverting of crossovers, accesses and front garden parking to pavement and / or garden as appropriate and reinstatement of architectural and street features that may have been removed either in whole or part by the creation of a crossover and/ or vehicular access and/ or parking."</p>	
614	DM411	Colin Marr on behalf of the Crossover Group	Support for SPG1b	<p>Both draft policies should be replaced by a single DM. Replace the existing Draft DM44 and DM45 with a new DM44:</p> <p>Policy DM44 Parking in Front Gardens and Vehicular Access</p> <p>Parking in front gardens and on driveways is generally unacceptable and will not normally receive permission. In exceptional circumstances where permission is granted, it will be conditional on approximately 50% of the area being soft landscaped as garden.</p> <p>Parking in front gardens is visually intrusive, especially in conservation areas, and constitutes a loss of amenity space. Vehicles crossing the public footway to access parking spaces are a safety hazard to pedestrians, cyclists and other road users. Front garden parking often leads to an unacceptable loss of on-road parking spaces available for residents generally</p> <p>The Council will not normally support a proposal for a new crossover or new vehicular access, unless in exceptional circumstances it can be demonstrated that the proposal will not result in:</p> <ul style="list-style-type: none"> <li>a. A reduction in pedestrian or highway safety;</li> <li>b. Increased surface water runoff due to impermeable hard standing</li> <li>c. A reduction of on-street parking capacity, particularly within a Controlled Parking Zone</li> <li>d. Demolition of a boundary wall that makes a positive contribution to the street scene; and</li> <li>e. A visual intrusion to the street scene.</li> </ul>	<p>Policies DM 44 and DM45 relate to different situations and seeking to address different issues hence separate policies have been included. DM44 primarily relates to highway impacts whilst DM45 is a design and environmental issue.</p>
614	DM412	Colin Marr on behalf of the Crossover Group	Support for SPG1b	<p>The council's intention is that policies DM44 and DM45 will replace SPG1b, which has been in existence for many years. The Crossover Group (see footnote about the group) is concerned that as drafted these two policies are inadequate to address the scale of the problem and would not be an effective substitute for SPG1b. The Group's concerns are set out below:</p> <ol style="list-style-type: none"> <li>1. Parking in front gardens and the associated provision of vehicle crossovers has cumulatively blighted the street-scene in many parts of Haringey and with consequential damage to the environment. This is evident in some of the through-roads (e.g Lordship Lane N17, Muswell Hill Road N10 and Durnsford Road N11) and in residential roads including some in conservation areas (e.g Wellfield Avenue N10).</li> <li>2. Although never formally adopted, SPG1b was introduced to combat this practice – it states unequivocally: "... <i>parking in front</i></li> </ol>	<p>SPG1b as unadopted guidance has been replaced by permitted development rights. However policy DM45 still supports retaining at least 50% of front gardens as landscaping where planning permissions is required.</p>

				<p><i>gardens is generally unacceptable <b>and will not normally receive planning permission.</b> Where planning permission is granted, it will be conditional on approximately 50% of the area being soft landscaped as garden. Parking in front gardens is visually intrusive, especially in conservation areas, and constitutes a loss of amenity space ... and also prove a safety hazard to pedestrians ..."</i></p> <p>3. DM44 and DM45, as drafted are feeble in comparison to the intention of SPG1b and need to be rewritten to strengthen the determination to resist further losses of front gardens.</p> <p>4. The Crossover Group acknowledges that the GPDO and the Highways Acts give property owners rights to impose their will in certain circumstances, but it is incumbent on the council to protect the interests of the community and residents generally, and to refuse applications wherever possible.</p> <p>5. This subject was reviewed fully by the council at Cabinet level in November 2007. This resulted in the adoption of more stringent criteria on crossover applications and revalidation and reissue of SPG1b in 2008. The council has not reviewed its policy in this area since 2008 and there are no grounds now to dilute policy as currently drafted. On the contrary, there is every reason to strengthen it. <u>Our recommendation below is entirely consistent with the agreed views of the Cabinet, which needs to be reflected in the relevant DM statements of policy.</u></p>	
624	DM413	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	The Council welcomes support of this policy.

## Comments on DM45 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
607	DM414	Muswell Hill & Fortis Green Association	Conservation	<p>The Association regards these policies as two aspects of the same issue. It is opposed to the creation of vehicular accesses and crossovers and the use of the whole or part of front gardens for parking purposes because :</p> <p>A. They degrade the built environment by:</p> <ul style="list-style-type: none"> <li>i. reducing the amount of planting on or near a highway causing loss of visual cohesion to the street scene,</li> <li>ii reducing the ameliorating affect of vegetation on pollution.</li> <li>iii. cause the loss of architectural harmony on a highway by removing either wholly or partially front garden walls and or hedges and</li> <li>iv. creating a visually " hard" intrusive element to a street scene.</li> </ul> <p>B. Reduce the amount of natural drainage and contribute to run-off</p> <p>C. Are a danger to pedestrians not only when a cross-over / vehicular</p>	Policies DM 44 and DM45 relate to different situations and seek to address different issues hence separate policies have been included. DM44 primarily relates to highway impacts whilst DM45 is a design and environmental issue.



				<p>access is in use but also when the parked vehicle overhangs the pavement.</p> <p>D. Are a danger to other road users particularly when vehicle accesses the highway by backing onto it.</p> <p>E. Reduce the amount of parking available in the public realm.</p> <p>Consequently the Association would wish policies DM43 and DM44 to be made one policy to read as follows:</p> <p>“The Council will not support any proposal for a new crossover or new vehicular access from a highway to an existing or proposed private dwelling and will not support any proposal for parking on front gardens.</p> <p>In the exceptional event of consent being granted for parking on a front garden it will be a condition that no less than 50% of the garden is soft landscaping and any hard standing should seek to improve drainage and reduce flooding of the public highway and/or adjacent properties through the use of a permeable paving material.</p> <p>The Council will encourage the reverting of crossovers, accesses and front garden parking to pavement and / or garden as appropriate and reinstatement of architectural and street features that may have been removed either in whole or part by the creation of a crossover and/ or vehicular access and/ or parking.”</p>	
614	DM415	Colin Marr on behalf of the Crossover Group	Support for SPG1b	<p>Both draft policies should be replaced by a single DM. Replace the existing Draft DM44 and DM45 with a new DM44:</p> <p>Policy DM44 Parking in Front Gardens and Vehicular Access</p> <p>Parking in front gardens and on driveways is generally unacceptable and will not normally receive permission. In exceptional circumstances where permission is granted, it will be conditional on approximately 50% of the area being soft landscaped as garden.</p> <p>Parking in front gardens is visually intrusive, especially in conservation areas, and constitutes a loss of amenity space. Vehicles crossing the public footway to access parking spaces are a safety hazard to pedestrians, cyclists and other road users. Front garden parking often leads to an unacceptable loss of on-road parking spaces available for residents generally</p> <p>The Council will not normally support a proposal for a new crossover or new vehicular access, unless in exceptional circumstances it can be demonstrated that the proposal will not result in:</p> <p>a. A reduction in pedestrian or highway safety;</p> <p>b. Increased surface water runoff due to impermeable hard standing</p>	<p>Policies DM 44 and DM45 relate to different situations and seek to address different issues hence separate policies have been included. DM44 primarily relates to highway impacts whilst DM45 is a design and environmental issue.</p>

				<p>c. A reduction of on-street parking capacity, particularly within a Controlled Parking Zone</p> <p>d. Demolition of a boundary wall that makes a positive contribution to the street scene; and</p> <p>e. A visual intrusion to the street scene.</p>	
614	DM416	Colin Marr on behalf of the Crossover Group	Support for SPG1b	<p>The council's intention is that policies DM44 and DM45 will replace SPG1b, which has been in existence for many years. The Crossover Group (see footnote about the group) is concerned that as drafted these two policies are inadequate to address the scale of the problem and would not be an effective substitute for SPG1b. The Group's concerns are set out below:</p> <p>6. Parking in front gardens and the associated provision of vehicle crossovers has cumulatively blighted the street-scene in many parts of Haringey and with consequential damage to the environment. This is evident in some of the through-roads (e.g Lordship Lane N17, Muswell Hill Road N10 and Durnsford Road N11) and in residential roads including some in conservation areas (e.g Wellfield Avenue N10).</p> <p>7. Although never formally adopted, SPG1b was introduced to combat this practice – it states unequivocally: “... <i>parking in front gardens is generally unacceptable and will not normally receive planning permission. Where planning permission is granted, it will be conditional on approximately 50% of the area being soft landscaped as garden. Parking in front gardens is visually intrusive, especially in conservation areas, and constitutes a loss of amenity space ... and also prove a safety hazard to pedestrians</i> ...”</p> <p>8. DM44 and DM45, as drafted are feeble in comparison to the intention of SPG1b and need to be rewritten to strengthen the determination to resist further losses of front gardens.</p> <p>9. The Crossover Group acknowledges that the GPDO and the Highways Acts give property owners rights to impose their will in certain circumstances, but it is incumbent on the council to protect the interests of the community and residents generally, and to refuse applications wherever possible.</p> <p>10. This subject was reviewed fully by the council at Cabinet level in November 2007. This resulted in the adoption of more stringent criteria on crossover applications and revalidation and reissue of SPG1b in 2008. The council has not reviewed its policy in this area since 2008 and there are no grounds now to dilute policy as currently drafted. On the contrary, there is every reason to strengthen it. <u>Our recommendation below is entirely consistent with the agreed views of the Cabinet, which needs to be reflected in the relevant DM statements of policy.</u></p>	Policies DM 44 and DM45 relate to different situations and seek to address different issues hence separate policies have been included. DM44 primarily relates to highway impacts whilst DM45 is a design and environmental issue.
624	DM417	Tottenham & Wood Green Friends of the Earth	Support Policy	N/A	Council welcomes support of this policy.

740	DM418	Hornsey Historical Society – David Frith	Wording	Policy is worded “the Council will only support..” instead of “will only permit..” This wording is misleading and implies positive action, possibly initiated, on the part of the Council.	The Council agrees and has amended DM45 accordingly. <b>Action: Amend policy as suggested</b>
740	DM419	Hornsey Historical Society – David Frith	Garden walls	Mention should be made of the desirability of preserving garden walls as far as possible with particular reference to Conservation Areas. This issue should also be dealt with in DM 12.	The loss of front garden walls can be considered as part of planning applications in Conservation Areas.

**Comments on DM46 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

Respondent ID	Comment ID	Respondent	Topic	Summary of Response	Council Response
593	DM420	John Crompton, local resident	Text change	Replace “should” with “must”.	It is considered the policy as worded will achieve the objectives.

**Comments on DM47 of the Local Plan: Development Management Policies Regulation 18 consultation Feb-Mar 2015**

No comments