

Place and Sustainability
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My Ref : SP/LBH/Cons2/GA

Your Ref :

Date : 24th March 2014

Dear Sir/Madam

Public Consultation on LBH Site Allocations Development Plan Document and Tottenham Area Action Plans

Thank you for the opportunity to comment on Haringey's draft Tottenham Area Action Plans and Site Allocations DPD. Overall the emerging policy approaches are supported in principle. I would welcome continued discussion on the evolution of these documents and the Local Plan as a whole as they progress towards adoption. In the meantime office comments on the documents are set out below.

1. Tottenham Area Action Plans

I note that the consultation introduces the principle of two Area Action Plans (AAPs) in Tottenham - Northumberland Park and South Tottenham.

General Comments

The emerging policy approach is supported in principle and will contribute to meeting the development aims of the Upper Lee Valley Opportunity area. However, it is suggested that the draft AAPs should also reference the potential for supporting the regeneration objectives of the wider London-Stansted-Cambridge corridor. It would also be helpful to make specific reference to both the Meridian Water Masterplan and to the Central Leaside Area Action Plan in the context of wider regeneration that will complement growth in Tottenham.

The planned measures to increase capacity of existing transport services and improve connectivity are supported. These should in due course be referenced in an Infrastructure Delivery Plan to show availability of investment and phased provision that supports growth in a sustainable way.

As you know both our Councils have been working together over the last few years on the potential for a city-scale decentralised energy network within the Upper Lee Valley

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area. Known as the Lee Valley Heat Network, research undertaken to date has confirmed that the resultant network can deliver heat to sites across the Lee Valley, including sites in Enfield, Haringey and Waltham Forest.

The Lee Valley Heat Network could deliver significant economic, environmental and social benefits - greater than would otherwise be achieved by individual developments. This should be recognised as a key theme of the emerging Area Action Plans.

It is understood the proposed review of employment land designations will be informed by a forthcoming Employment Land Review. The Council would wish to be included in any engagement on this to ensure a coordinated approach that supports the spatial planning objectives of both Councils – particularly with regard to the concentration of employment activity in the Lee Valley corridor.

Opportunities to improve visitor facilities and recreational uses in the Lee Valley Regional Park in order to increase local and wider London usage are supported. Again, the Council would wish to work collaboratively with Haringey and key partners in shaping these proposals.

The development of a leisure quarter in the High Road West area is of interest. It is important that any future leisure development respects the town centre hierarchy set out in the London Plan. Any planning application should be supported by a robust impact assessment which takes account of the effect on nearby town centres including those within Enfield borough.

The proposed development of 10,000 new high quality homes is a very significant level of growth and it is important that its full implications are considered. The Site Allocations document indicates that a high concentration of this development would take place on sites around Tottenham Hale Station and there would be substantial housing estate renewal within other parts of the Tottenham area. Given the potential scale of development I would be interested in seeing the findings of research indicating the potential physical, social and economic impacts. The principles of estate renewal and moving away from mono-tenure that dominates some parts of the area are supported. I understand the figures reported in the document are net additional units. It will be of interest to see the analysis that underpins this.

Northumberland Park Area Action Plan

The Northumberland Park AAP's northern boundary adjoins the southern boundary of Enfield from the A1010 in the west to the River Lee in the east. The AAP will need to consider contextual factors related to the Meridian Water Masterplan area where around 5,000 new homes and 3,000 jobs are planned. Such matters will include connections, flood mitigation, built form, infrastructure network (including open space)

and land use.

The Council considers that it is important that the draft AAP provides justification for additional town centre uses in Northumberland Park. These must be supported by evidence to show that this growth can be accommodated within capacity estimates and ensure it would not have negative impact on existing town centres. It is vital that the planned additional capacity for Meridian Water set out in Enfield's Core Strategy is not compromised. You may be aware that the Council is currently conducting a Town Centre and Retail Study for Enfield which is expected to include the revision of retail growth forecasts for the borough.

The plans for Northumberland Park area should recognise the demand that growth will place on social infrastructure. The Council recognises that demand for school places remains high, with demand consistently outstripping supply of places (Haringey School Place Planning Report, 2012). It is important for the draft AAP to identify proposals for the provision of additional school places and other supporting community infrastructure in this location to ensure that proposals in Northumberland Park meet the needs of that area.

South Tottenham Area Action Plan

The South Tottenham AAP includes plans to transform Tottenham Hale into a district centre by 2025. It is not clear what research this is based on and further information will be needed to determine the likely impacts, whether they are positive or negative, on Enfield's centres including Edmonton Green and Angel Edmonton.

2. Site Allocations

With reference to Site NT2-Tottenham Hotspur Stadium Redevelopment, the level of town centre provision associated with the Tottenham Hotspur stadium scheme exceeds 35,000 sq.m – substantially more than the food store included in the Tottenham Hotspur FC planning consent. It is recognised that the site will build on the international presence of Tottenham Hotspur Football Club as a sporting and leisure destination in the wider regeneration of the area. Whilst this is supported in principle it is vital it is done in a way that complements and indeed benefits the High Street corridor including Angel Edmonton and Edmonton Green within Enfield. The Council would expect to be involved in future discussions on this relationship.

The recognition that both sites (NT2) Tottenham Hotspur Stadium Development and (NT3) High Road West could act as hubs for the decentralised energy network is fully supported. However, this should be closely aligned to the outcomes of the work undertaken to date on the Upper Lee Valley Decentralised Energy Network (2011 and 2012) and on further work that relates to this scheme. This may include, where

appropriate, more detailed policy measures and site proposals to safeguard energy centre site(s) and way-leaves for pipe networks and should address the links through Northumberland Park to Meridian Water.

The future need for, and mix of, town centre uses at High Road West (NT3) should be correctly defined and further developed, so that the retail approach is proportionate to local needs and does not adversely impact upon the existing retail centre network.

The Council is concerned that a number of the proposed site allocations (NT3, TH4, TH5, TH8, HO1) cover areas which accommodate existing waste treatment sites or sites which have been considered as part of the North London Waste Plan. In line with the requirements under the London Plan (Policy 5.17) and the North London boroughs' responsibilities in preparing the North London Waste Plan, the proposed allocations must make clear that the re-provision of waste sites will be prioritised within the redevelopment proposals or cross reference to other allocations which provide compensatory provision to ensure that there is no net loss in waste capacity.

Industrial and employment land provide major opportunities for locating waste uses. Significant reductions in the amount of designated industrial land may compromise opportunities for new waste development to come forward. It is noted that an Employment Land Review will be used to inform development options, however, the Council requests that this Employment Land Review takes into account any requirements identified through the North London Waste Plan.

The currently vacant Friern Barnet former sewage works (MH3) appears to present opportunities and the emergence of option proposals are awaited. Haringey Council should ensure first that this does not prejudice waste site provision in relation to the North London Waste Plan. The site partially adjoins the New Southgate Masterplan area and in this regard it may be appropriate to look at connections and improvement to areas within Enfield. These could include measures to overcoming severance of the North Circular Road and upgrading access and facilities to New Southgate Railway Station. It is understood that development of options will be reliant on studies which include the Open Space and Biodiversity Review, Employment Land Review, and North London Waste Plan.

Sites WG2 Wood Green Bus Depot and THR4 Tottenham Green Bus Garage are identified for redevelopment. Wood Green is indicated to include a replacement bus garage with other residential and town centre uses in a tower. Tottenham Green is indicated as being capable of accommodating residential, town centre and community uses subject to the replacement of the bus garage. Further details are needed on the impacts of such development on the continued functioning of these essential sites for bus services and the adequacy of proposed replacement facilities.

I really do suggest that you give consideration to the above points. We look forward to

a continued discussion on your options and proposals as they develop. As such I would welcome a meeting with you to discuss proposals on both sides of the borough boundary and to maximise the benefits of partnership working and to satisfy the requirements of the Duty to Cooperate.

Yours faithfully

A handwritten signature in blue ink, consisting of a large, stylized capital letter 'P' followed by the name 'Paul Walker' in a cursive script.

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Assistant Director of Regeneration, Planning and Economic Development

