

Tottenham Area Action Plan – response from Tottenham & Wood Green Friends of the Earth

Item (policy or paragraph)	Why there is a problem	Proposed change
Flood risk	<p>Much of the proposed development will be in the River Lee floodplain, and only 10m above sea level. The floods of 2015/16 have shown previous assessments re “1 in 100 years” etc to be no longer valid. The world is on course for 3.7°C warming. So where will sea level be in 100 or 200 years (when on current trends the buildings we put up now may still be required)?</p>	<p>So there should be a new point recognising that –a new assessment should be carried out looking at global warming up to 3.7°C.</p>
2.65 Green space	<p>“New public spaces need to be added and existing spaces significantly improved... opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged”. (but 2.66 goes on “increasing the quantity of open space is difficult in an urban borough”. The Plan does not acknowledge that green open space is already at risk (eg due to railway works, potential housing development at Plevna Crescent, and proposed housing along Monument Way), and that more will be lost if its vision comes to be. Some will be created – we welcome for example the Green Grid across Tottenham Hale and the proposed Bruce Grove Wood SLOL (though we seek clarification on how the latter will be created). But there seems to be no overall assessment of space being lost; so it isn’t clear if there will be a net gain or loss; and the rising population means we do need a net increase.</p> <p>At the same time we know that many – and probably most - of our wildlife species are in decline and we need to do much better at</p>	<p>So in terms of wording, we suggest amending 2.65 to read <i>“Some development will lead to loss of green open space and natural habitat, for example the three-tracking and Crossrail 2 works at Tottenham Hale. New public spaces need to be added and existing spaces significantly improved including access improvements so that each part of Tottenham has a quality network of green and accessible space that supports a diversity of nature. The Council will monitor gains and losses and ensure a net gain. Opportunities to provide open space as part of major development schemes or master plans developed in Tottenham will be encouraged including opportunities at Ermine Road and Plevna Crescent”.</i></p>

	<p>providing quality joined-up habitat. So, the Council needs to:</p> <ul style="list-style-type: none"> • work with the local community to look at opportunities, including working with TfL and Network Rail to take Ermine Road and Plevna Crescent open land back into public ownership, so that the remaining open land can be managed for nature and amenity for when Crossrail 2 is built and Gourley Triangle developed (the developer has not started work at Plevna Crescent despite getting planning permission on appeal last year). • Ensure that green corridors do provide high quality natural habitat. • Make new developments really green – on their roofs (where not suitable for PV panels), walls and open spaces, with bird- and bat boxes integrated into structures and with appropriate mix of native species. • Actively conserve species we do have – for example the small colonies of House Sparrows in South and North Tottenham. Sparrows depend on access to roof space, which means they do best in older streets. Building renovation often blocks such access so we need to ensure it is replaced when renovation occurs. 	
Spatial vision	The plan needs to provide the backing for a big increase in cycling and walking – for health and environmental (air quality and climate change) reasons.	
Housing 3.9	We welcome the fact that the vision includes “much needed higher quality council housing” but not clear if this means more such	Change text to make it clear we need more council housing as well as better quality

	housing or just improving quality of existing numbers. We need both.	
Housing 3.15	It is not clear what is meant by “affordable” – we need really affordable housing for low income people, not just “affordable” by government definition.	Set out affordability definition.
Climate change AAP1	We welcome the reference in D to “reduce carbon emissions and adapt to climate change”. We welcome proposals regarding decentralised energy grids and hope this will be given due priority in subsequent negotiations and planning conditions.	We propose that all such mentions in the individual site sections should be in Site Requirements not Site Guidelines.
Housing policy AAP3	The plan needs to deliver better housing for existing people, including more, affordable homes as well as bigger homes to ease overcrowding.	Set this out in the text.
AAP6	tall buildings. We do not consider the Hale Wharf site suitable for tall buildings. This is in line with the wording elsewhere in 4.26 - DM6 – building heights should “respond to existing street hierarchy” and “decrease into the quieter hinterland areas”. “Where elements that are considerably taller than this consistent height such as at Seven Sisters station in the Apex House site allocation or at Northumberland Park station... they should mark something or somewhere and have a reason for being taller. These by their very nature should be few in number”. Hale Wharf is not itself Green belt land but it has Green Belt land to the west, north and east (and a bit further to the south as well). So tall buildings here will severely impinge on the sense of openness that the plan says it seeks to preserve.	Para F – “Ferry Lane” – should differentiate between those bits of Ferry Lane in DCF and those next to river/Green Belt. And make it clear that hale Wharf is not suitable for tall buildings.
Transport 4.29	Managing and improving the capacity of the road network”. But we know that increasing the	We suggested changing the text by deleting “ <i>and improving the capacity of</i> ”.

	capacity will encourage more traffic, and an aim of the gyratory works was to reduce capacity to discourage through-traffic. So why now do we want to increase it?	
AAP8	AAP8 and elsewhere – we welcome proposals for car-free development but stress that car-free policies are nullified unless there is comprehensive CPZs in all surrounding streets – otherwise residents will “cheat” by parking on nearby public highway (or estate roads) There is evidence that this already happens (people from car-free developments parking on Jarrow Road, and people from Hale Village parking here to avoid parking charges).	Set out policy aim to have comprehensive CPZs in development areas where car-free or car-capped housing is proposed.
4.35	4.35 “delivering new open spaces of a significant scale is not considered”. Considering the growth in population and the existing deficiencies this betrays a lack of ambition. It also possibly contradicts 2.65. See our comments above on the need for more open space.	We suggest re-wording 4.35 to say <i>“Due to the significant projected increase in housing and employment in Haringey and Tottenham, the Council will seek to establish new open space where opportunities arise, and to create linkages between them for people and wildlife. Tottenham does have a range of excellent open spaces within it, but some are being lost and others are under pressure from growing population. Development contributions have the potential to be collected and spent on adding to, improving and improving access to existing open spaces. Together, these will form a green grid of networked, high quality open spaces”</i> .
4.36	The sentence beginning “The more built up character” is unintelligible. Can we have a translation? Should it be “eradication” not “education”?	
AAP11 – B	– should this be “tertiary education operators” not “tertiary employment operators”?	
5.23	This makes reference to new	Explain proposals for Lawrence

	improved SLOL at Lawrence Road but does not explain what they are. We would very much welcome such a step. What are the plans?	Road SLOL
SS2	Last bullet point – should this refer to West Green Road not Seven Sisters Road?	
SS3	The current estate has a lot of open space but it may be of poor quality both ecologically and amenity-wise.	The policy should require this to be improved in any redevelopment, for example restoring some of the trees.
SS4 – 4 th bullet	. It would be desirable to improve and extend the SINC and ecological corridor, especially if housing development goes ahead on Plevna Crescent site. But much better would be to re-secure Plevna Crescent as public open space and connect it to Gourley Triangle as envisaged in 5 th bullet of development guidelines. See comments above on 2.65. We welcome the requirement to deculvert the Stone Bridge Brook on this site.	
TG2	is it possible to create an east-west green corridor connecting to the ecological corridor of the railway track?	Insert a Guideline accordingly
5.70	New improved SLOL at Bruce Grove Wood. We strongly welcome this, what are the plans? A mini-park at the rear of the heritage buildings would give them an improved setting.	Set out the plans for this SLOL.
5.94	creation of high-quality public space network.	This should include good habitat (trees, hedgerows etc) connecting the Lee Valley and Bruce Castle etc.
NT5 last bullet	The Moselle. Can this be deculverted?	Insert guideline accordingly
Northumberland Park	The large-scale redevelopment opens up the opportunity to create some east-west ecological corridors.	Include requirement for east-west ecological corridors.
TH3, 4, 5, 6 –	We agree that parking should be minimised. But see comments re need for CPZ above.	
TH3	“Opportunities to green the existing SINC adjoining the railway	

	line” – we agree. This should be partly to recompense for losses elsewhere.	
TH7	“subject to the reprovision of the licensed waste capacity at the Ashley Road depot site” and last bullet point. But has any such reprovision been planned? The TAAP does not name a site, and surely it should.	Designate a site for new civic amenity site in Tottenham Hale
TH8	The tower at Hale Village – no justification has been produced for a building over 18 storeys and it isn’t needed for housing target,	Set firm limit of 18 storeys
TH9 Hale Wharf. Site Requirements – penultimate bullet	The environmental impacts could include lighting – the water channel between the wharf and the Paddock is unlit	The new development must have suitably adapted street lighting, of a light wavelength, location, angling and timing to ensure that no disturbance is caused to bats, moths and other nocturnal wildlife. But the requirement must also apply to lighting from homes – through a ban on security or other external lighting, and measures to control spillage of light from indoors. And this must be conditioned in such a way as to ensure continuing long-term compliance with enforcement measures.
TH9	Development guidelines – we support second bullet, ie the development must not adversely impact on ecological assets	
TH9 5 th bullet	we agree it must respond to proximity and openness of Green Belt. The site is not <i>adjacent to</i> but <i>within</i> the river corridor and Green Belt, with the river to one side and the Paddock and reservoirs to the other, The sense of openness should be preserved from Ferry Lane northwards, including around the lock. High buildings at this point would create the reverse of openness, and create a canyon feel, with Hale Village at 12 storeys on one side and new high buildings on the other.	Set limit of 6 storeys for this site.
TH9 6 th bullet	support. The development must be responsive to the natural environment. This should include	

	green walls/roofs facing river on both sides, and incorporate bird and bat boxes etc.	
TH9 Last bullet point	we agree. See earlier point about need for revised flood risk assessment for the whole area.	
TH10 Welbourne Centre	We are concerned about the loss of open green space from the proposed housing development. The Plan must ensure that the Green Link at least compensates for this in terms of area, and improves on it in terms of habitat quality. The last bullet point of D Guidelines notes that the wall currently provides a noise barrier. If this is removed then the new development needs to provide at least as good an acoustic barrier from traffic noise. How will the new homes be protected from noise and air pollution?	Specify how new homes will be protected
TH11	This area includes part of the O'Donovans site. The other part of their site will be affected by Crossrail 2. The operation is a blight on residents of Ferry Lane estate through its noise and, sometimes, dust. The operation is also a blight on Markfield Road – danger, dirt and mud, and an appalling road surface. If the operation will have to move at some time, then the Council should be working to secure the greatest benefit by working with the company to move them earlier rather than later – when land to relocate them in NE Tottenham industrial estates is still available and affordable	

Please note that I wish to speak at the examination in public. I am a resident of Tottenham Hale and live very close to many of the proposed developments

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